



Report to Horsham District Council

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REPORT ON THE EXAMINATION INTO THE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

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Abbreviations used in this Report

¶	paragraph
§	section
p	page
2004 Act	Planning and Compulsory Purchase Act 2004
AAP	Action Area Plan
AONB	Area of Outstanding Natural Beauty
BUAB	Built-up Area Boundary
CP	Core Policy
CS	Core Strategy
DC Policies	General Development Control Policies (DPD)
DPD	Development Plan Document
GOSE	Government Office for the South East
LDF	Local Development Framework
LDS	Local Development Scheme
ODPM	Office of the Deputy Prime Minister
PDL	Previously-developed land
PPG	Planning Policy Guidance Note 3 – <i>Housing, 2000 (cancelled November 2006)</i> 4 – <i>Industrial and Commercial Development and Small Firms, 1992</i> 8 – <i>Telecommunications, 2001</i> 9 – <i>Nature Conservation, 1994</i> 13 – <i>Transport, 2001</i> 15 – <i>Planning and the Historic Environment, 1994</i> 16 – <i>Planning and Archaeology, 1990</i> 17 – <i>Sport and Recreation, 1991</i> 22 – <i>Renewable Energy, 1993</i> 23 – <i>Planning and pollution Control</i> 24 – <i>Planning and Noise</i> 25 – <i>Development and Flood Risk, 2001</i>
PPS	Planning Policy Statement 1 – <i>Delivering Sustainable Development, 2005</i> 3 – <i>Housing, 2006</i> 6 – <i>Planning for Town Centres, 2005</i> 7 – <i>Sustainable Development in Rural Areas, 2004</i> 12 – <i>Local Development Frameworks, 2004</i>
RD	Reference Document (Core Document)
Regulations	Town and Country Planning (Local Development) (England) Regulations 2004
RPG9	Regional Planning Guidance for the South East, 2001
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SEERA	South East England Regional Assembly
SEP	South East Plan
Site	
Allocations	Site Specific Allocations of Land (DPD)
SoS	Secretary of State
SP	West Sussex Structure Plan
SPD	Supplementary Planning Document

Test	Test of soundness (PPS12 ¶ 4.24)
	Procedural
	1 – <i>it has been prepared in accordance with the local development scheme</i>
	2 – <i>it has been prepared in compliance with the statement of community involvement</i>
	3 – <i>the plan and its policies have been subjected to sustainability appraisal</i>
	Conformity
	4 – <i>it is a spatial plan which is consistent with national planning policy and in general conformity with the regional spatial strategy for the region . . . and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas</i>
	5 – <i>it has had regard to the authority's community strategy;</i>
	Coherence, consistency and effectiveness
	6 – <i>the strategies/policies/allocations in the plan are coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant</i>
	7 – <i>the strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base</i>
	8 – <i>there are clear mechanisms for implementation and monitoring</i>
	9 – <i>the plan is reasonably flexible to enable it to deal with changing circumstances</i>

Introduction

1. We have carried out an independent Examination into the statutory compliance and soundness of Horsham District Council’s Core Strategy Development Plan Document (DPD). The Examination¹ was conducted by way of written representations and by hearing sessions held at Park North, Horsham. We have had regard to the issues raised in all the representations duly made on the DPD in the 6 week period following its submission to the Secretary of State (SoS), although they may not be specifically referred to in our Report. Essentially, we have concentrated on the issues that go to the heart of whether the Core Strategy (CS) is sound or not.
2. This Core Strategy (CS) is amongst the first dozen or so DPDs to have reached this stage under the provisions of the 2004 Act. Thus the Council has had to undertake pioneering work to interpret the legislation, taking into account Government and other advice. It has been a challenging learning process for everyone. As discussed during the Examination hearings, if the strategy were to be written now in the light of all the experience gained, it would look somewhat different to the one we have before us. This first CS is a lengthy document and whilst this in itself does not make it unsound, if the LDF process is to work efficiently with documents produced and reviewed in line with demanding timetables, documents must be much shorter in future. Background documents should be relied on to provide detailed explanations. Thus this CS should be viewed as part of the evolutionary process of interpreting the 2004 Act and not as a template for other councils to follow.
3. It also has to be acknowledged that it is over a year since the CS was submitted, setting out decisions made perhaps nearly 18 months ago following an extensive consultation period of “front loading” effectively commenced in 2002. Since the CS was submitted, the Draft Regional Spatial Strategy for the South East – The South East Plan (SEP) – has also been put before the SoS and both a consultation draft and the final version of a new PPS3, Housing, have been published. Whilst these are now material considerations they clearly cannot have been taken into account in decisions on this CS and our conclusions reflect this. In particular the final version of PPS3 was published very near the end of the Examination process, well after the close of the hearing sessions, so its guidance has not been taken into account in our recommendations. However, it will now be for the Council to consider what action² it needs to take in response to PPS3, including what should be included in its next Local Development Scheme (LDS).

Review of the Core Strategy

4. The Council is fully committed to undertaking a review of the CS once the SEP has been finally published by the SoS, which is expected to be in 2008. The Council’s 2006 LDS confirms this commitment (RDHor26). This will also be the opportunity, if not previously taken, to update the CS to reflect changed circumstances such as the publication of new Government policy that could not be taken into account in the current DPD.

Our Overall Conclusion

5. **The CS is sound, subject to the document being changed in accordance with our recommendations set out in Annex A: Schedule of Changes.** The adopted CS will set out a satisfactory spatial vision for the District and will provide a suitable framework for subsequent DPDs.
6. In summary, the key changes we recommend are:
 - Inclusion of the opportunity to allocate reserve housing sites in a subsequent DPD for release should annual monitoring demonstrate the need;
 - The recategorisation of Broadbridge Heath as a Category 1 settlement;

¹ A Pre-Examination meeting was held on 22nd May 2006 to discuss procedural matters.

² This is requested in the letter dated 29th November to all Heads of Planning Services from Mrs Joan Bailey, Department of Communities and Local Government.

- The deletion of Brinsbury College and Warnham Brickworks as strategic employment locations, the sites to be considered in a subsequent DPD;
- The introduction of the opportunity to allocate sites solely for affordable housing in rural settlements; and
- The deletion of CP 17 Gypsy and Traveller Sites, the subject to be considered in a subsequent DPD.

Our Approach

7. Our starting point, in accordance with Government policy, is that the CS is presumed sound unless it is shown to be otherwise as a result of the evidence considered at the Examination (PPS12 ¶ 4.24). The term “Examination” refers to the whole period from the submission of the DPD to the dispatch of this binding Report to the Council. In the light of all the circumstances here, we have striven in our Report to achieve efficient and pragmatic ways of delivering the aims of the new system and the aspirations of those involved. We have considered carefully our recommended changes to ensure that the aims of the strategy are not changed to the extent that the interests of any party would be prejudiced. Where representations suggest minor alternative wording which, in our view, does not go the fundamental soundness of the CS, we have not necessarily referred to it in this Report.
8. It must be stressed that the CS is but one document in the emerging Local Development Framework “folder”, which will be supplemented by other Local Development Documents. It is essentially a *strategy*, from which more detailed policies will flow. Thus we agree with the Council that the Core Policies should be as focused, spatial and as succinct as possible, devoid of the clutter which sometimes surrounds policies aimed at the day-to-day control and management of development.
9. Our Report firstly deals (in Section 1) with the statutory requirements under s20 of the 2004 Act, including the procedural tests of soundness (1 to 3) set out in PPS12 ¶ 4.24. The Report goes on to consider the soundness of the Spatial Vision and Objectives, the issues raised by the CPs and the monitoring framework, which coincidentally generally follow the sequence set out in CS Chapters 4 and 5, having regard to the remaining 6 Tests described in PPS12. Our recommendations take account of the reasoned justification and refer back to earlier chapters in the CS, where necessary, in the interests of consistency.
10. Whilst an outline of our recommendations is given at the end of each Section, full details of the required changes are set out for ease of reference in Annex A: Schedule of Changes. In some cases, in the interests of simplicity, we have recommended the deletion and replacement of substantial blocks of text, even though the changes are relatively modest and much of the existing text is retained. Annex A also contains changes put forward by the Council to delete text which was relevant when the DPD was submitted to the SoS, but now requires updating in anticipation of adoption. In addition, the Annex contains such changes as “signposting”, e.g. directing the reader to where the monitoring indicators can be found.
11. During the course of the Examination the Council put forward a number of suggested changes to the CS based on the representations made by various parties. These were in turn sent to all those present at the hearing sessions for their comments, and were also published on the Council's web site. Nearly all of the Council's suggested changes are either minor changes of policy wording, additions or deletions of text, or are otherwise editorial in nature - and all reflect comments previously made in representations. They do not alter the spatial vision or the aims and objectives of the CS, and so we are satisfied that a fresh SA is not required.
12. The CS is a long and complex document. Whilst we have attempted to identify as many consequential amendments as possible that may follow from our recommendations, issues of consistency may arise. In the event of any doubt, we are content for such matters, plus any minor spelling, grammatical or factual matters, to be amended by the Council so long as the underlying meaning of the Plan is not altered.

1. Procedural Matters

- 1.1 We deal here with statutory matters and procedural tests of soundness (1 to 3 and 4c) set out in PPS12 ¶ 4.24, and the content or scope of a CS. On the statutory matters, with the changes we recommend, we consider that the CS satisfies the requirements of s20(5)(a) and (b) of the 2004 Act and the associated Regulations.

Test 1 – Consistency with the Local Development Scheme

- 1.2 The CS is properly identified in the Council’s approved LDS (RDHor26). The CS has been prepared in accordance with the principles and profile set out in the LDS. Therefore, we conclude that this test is satisfied.

Test 2 - Compliance with the Statement of Community Involvement and Regulations

- 1.3 The relevant SCI (albeit in pre-adopted form) during the course of the preparation of the CS and the SA was that dated February 2006 (RDHor24). We have two concerns that we address below. Firstly, the Council did not consult all adjoining parish councils as required under Regulations 25/26. However, the Council subsequently consulted these parish councils at the submission stage under Regulation 28, and none replied. Given this, we agree with the Council that there was no substantial prejudice to these councils.
- 1.4 Secondly, the Council changed the details of the West of Horsham proposal (CP 7) throughout the various stages of the progress of the CS, and this led to many claiming that there had been inadequate consultation. At the Issues and Options stage the main parts of the site were to be for 1000 homes and a new specialised campus for the University of Sussex. In the CS Preferred Options the central parts of the site either side of the A24 were instead to be for a mixed use development of 1250 homes, with the extreme western and south-eastern parts shown in the Site Allocations DPD Preferred Options as being for future requirements beyond 2016. In the Submission CS, all of that site and a small western addition have been shown for 2000 homes (CP 4 and CP 7) up to 2018, with various development principles which included other facilities, e.g. for the football clubs.
- 1.5 We agree with the Council that the strict test of soundness in this case is whether the CS has been prepared in compliance with the SCI. We are in no doubt that it has, and that the various steps set out in the SCI’s Appendix 1 have been followed by the Council.
- 1.6 We appreciate, however, that many were concerned that the Council had not followed the spirit of the new LDF system by giving the community and stakeholders adequate consultation about, and involvement in, the changes – especially those changes between the CS Preferred Options and the CS Submission. It was said that influencing and negotiating the changes was therefore difficult and/or came too late, and that this was not genuine involvement. However, we note that the Council carried out an additional consultation exercise in August and September 2005 on the CS Submission proposal, including meetings with the parish and neighbourhood councils and other stakeholders.
- 1.7 We consider that the Council made a considerable and commendable effort to involve people in the proposed changes after the CS Preferred Options. It went beyond what was required of it in the legislation or in its own SCI. Given that many of the representations object in principle to CP 7, the Council did not have an easy task and it could not realistically have been expected to achieve consensus. We are satisfied that it was pro-active in involving people in the CP 7 proposal and so, as a result, everyone understood each others’ position and the issues involved. Community involvement on CP 7 has been amply demonstrated (¶ 4.3 PPS12), and we have dealt with the resulting representations. Overall, therefore, we are satisfied that the CS and SA were prepared in accordance with the SCI and the Regulations. We conclude that they meet Test 2.

Test 3 - Sustainability Appraisal

- 1.8 The SA (RDHor17) should be seen in the light of the SP, which thoroughly investigated alternative development locations around Horsham and Crawley. The SA is required to do no more than assess reasonable options.

- 1.9 The SA confirms that a comprehensive SA process has been undertaken. Baseline data identified sustainability issues, which led to the objectives and indicators which were used to judge the sustainability of the various options. Mitigation measures were suggested for proposals. Whilst this methodology was sound, we found the selected alternative options to be a little simplistic. We appreciate that more detailed advice on SAs is now available. Overall, however, there were sufficient alternatives to provide reasonable, realistic and relevant options. Consequently, we are satisfied that this test is also met.

Test 4c - General Conformity with the RSS

- 1.10 By letter dated 16th December 2005, SEERA confirmed the CS’s general conformity with the adopted RSS (RPG9) as required by section 24(5) (Appendix 1, RDHor36). We are satisfied that the statutory requirements have been met in that regard and that the CS meets test 4c.

CS Content/Scope: CP 7 – Strategic Location versus Allocation

- 1.11 CP 7 identifies a specific location in the CS for residential development. PPS12 at ¶ 2.12 (and the Companion Guide at ¶ 3.4) advises that a CS should contain policies for locations, but that it should not identify individual sites as these will be dealt with in other DPDs (also ¶ 2.16). However, ¶ A2 in PPS12 indicates that key policy areas in CS’s, such as allocations of land for major development (e.g. urban extensions), may be shown on the Proposals Map, and ¶ 2.13 in PPS12 reflects this.
- 1.12 In this case we note that CP 7 arises from a commitment in the SP, is a major residential proposal in the CS, and is a key part of the strategy which has been examined and tested in the SA. It is, in our view, a sustainable major urban extension to both Horsham and Broadbridge Heath. We therefore regard it as a strategic proposal which is vital to the overall strategy of the CS, and thus it should exceptionally be included. The Council has undertaken a great deal of work to identify the exact area of a site required to accommodate the development, and these have recognisable and understandable boundaries. We see no reason to depart from them (see Section 7). Thus this is not a situation where it is appropriate only to identify the broad location of a development area on a key diagram (¶ A1 of PPS12).
- 1.13 The advice in PPS12 is not prescriptive, and it can be taken as exceptionally providing for a strategic allocation in the case of a major urban extension. More importantly, the new LDF system is intended to allow flexibility both in terms of policy approach and in terms of policy delivery. In this unique case, as the CS contains such a major site we see no reason why it should not specifically allocate it, leaving the details to be realised through a SPD masterplan. We believe this to be a reasonable and pragmatic solution given the large size of the site, its urban location, its importance to the CS housing objectives, and the detailed work undertaken to fix the boundaries by the Council.
- 1.14 We conclude that allocating this major urban extension site in the CS and dealing with the resulting further details in a SPD is sound under Test 4.

European Sites

- 1.15 Article 6 (3) of Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) requires “Appropriate Assessment” to be carried out of plans that could affect Special Protection Areas for birds and Special Areas of Conservation for habitats. During 2006 the Council commissioned consultants to carry out this Assessment (RDHor58) including consultations with (now) Natural England, the Environment Agency and Southern Water. There are European Sites within and beyond the District boundary, but the latter are generally too far away to be significantly impacted by proposals arising from this CS.
- 1.16 Regarding the Arun Valley SPA, the Council considers that the CS is unlikely to significantly affect water quality and CP 2 safeguards this situation. The issue of air pollution is also covered by CP 2. We find no convincing reasons to disagree with the Council’s judgement.

2. Spatial Vision and Objectives

2.1 The District is essentially a rural one (in a south-east England context) dominated by a single large town, Horsham, and within the influences of the buoyant Crawley / Gatwick sub-region. With attractive countryside and villages, and in part within two AONBs (one being a potential National Park), it offers its residents and workforce a high quality of life. However, the District is subject to significant development pressures.

2.2 Derived from its Community Strategy and the large range of other relevant documents, the Council has set out its vision in this CS of the *place* it wishes to see in 10 or more years time and the spatial strategy to achieve it. In summary this is to:-

- conserve, enhance and use efficiently the best of the resources it has now, both built and “natural”;
- achieve better design;
- provide for regional and local housing needs and for a healthy urban and rural economy;
- promote sustainable development by prioritising the use of well located PDL followed by two urban extensions;
- achieve the infrastructure and facilities needed to support this growth;
- provide for the needs of all sections of the community; and
- improve travel choice.

We believe the Council’s fundamental approach to be sound against Test 4 and Test 5 in that it is spatial and has had proper regard to other plans, policies and strategies relating to its area and to those adjoining, including its own Community Strategy.

2.3 The Council states that it wishes to manage the inevitable changes over the next 10 years in a constructive and proactive way. The very specific guidance in the up-to-date SP (2001 – 2016) limits the relevant alternatives for the future development strategy for the District. Within this context we consider that the nine core strategy spatial objectives are coherent and set the framework for positive conservation and enhancement policies and a sequential approach to the provision of land to meet future development needs, satisfying Test 6 and Test 7. Test 8 and Test 9 are not addressed here but dealt with later in the CS as an inevitable consequence of regular annual monitoring. We are satisfied that the strategy is deliverable, given the will and resources from all partners, and favourable market conditions.

2.4 It may be inevitable with high level objectives, but the core strategy spatial objectives are not overtly specific to this District and, with some editing, could equally apply to many other areas. Notwithstanding guidance in PPS12 and its Companion Guide, when the CS is reviewed the Council may wish to consider a simpler and shorter approach to progressing from its vision to the action necessary to achieve coordinated outcomes on the ground. Similarly the context set out in Chapter 2 of the CS might be better summarised, with the detail available in a background document. As discussed in our Introduction, we freely acknowledge the evolutionary process that the new LDF system will inevitably have to embrace. Once the CS, the Site Allocations and the DC Policies DPDs are in place, the Council will no doubt take an analytical view of how the process can be improved to meet demanding time scales for subsequent revisions, and to make the best use of the scarce resources at its disposal.

3. Sustainable Development Principles

Policy CP 1: Landscape and Townscape Character

Policy CP 2: Environmental Quality

Policy CP 3: Improving the Quality of New Development

3.1 In these three initial CPs the Council seeks to set out the broad policy basis against which the use and development of land will be considered. They flow from the Community Strategy and the CS Spatial Objectives and positively seek to promote the District’s local

distinctiveness. This is to be achieved by conserving and enhancing landscape and townscape character; supporting high quality management of the environment; and requiring high quality design. We find no convincing evidence that these policies are too restrictive or unsound under Test 7.

- 3.2 These are high level policies which set the framework – the essential “hooks” – for more detailed allocations and development control (including design) policies in subsequent DPDs. Thus we support the Council’s intention to focus on essential elements and reduce the clutter of detail in the CPs, the reasoned justification and Chapters 1 to 3 of the CS. Highlighting conservation and enhancement of habitats sets the scene for later DPDs. References in the CPs to “settlement separation” and “protected landscapes” encompass strategic gaps and AONBs, including the possibility of the future designation of a National Park. Such terms provide a degree of flexibility sought by Test 9 in the event of changing circumstances. Similarly, “minimising the emission of pollutants” and “minimising . . . the consumption of . . . fossil fuels” includes reducing the need to travel sought in PPG13. We find no compelling evidence that such an approach fails either Tests 4 or 7.
- 3.3 These initial CPs do not refer to the maintenance of a sustainable local economy as such, although CPs 10, 11 and 15, emerging from Spatial Objectives 5 and 6 (to provide for business and employment development and other needs), have this intent. However, the CS should be read as a whole. When the Council reviews the CS, it may wish to reconsider this essentially presentational issue and its relationship with the statement in the Community Strategy concerning access to a sustainable economy (¶ 3.1 of the CS) and ¶ 23 of PPS1. But we do not consider the present expression of policies to be unsound under either Tests 6 or 7.

Changes

- 3.4 Arising from the representations on the submitted CS, we agree with the Council that some rephrasing of CP 2 and ¶ 4.14 would add clarity to the CS and we recommend accordingly. We also recommend a cartographic correction to the Key Diagram.

RECOMMENDATIONS:

- 3.5 *Changes are required to sub paragraphs 2a. and 2b. of Policy CP 2, paragraph 4.14 of the reasoned justification and a notation on the Key Diagram as detailed in Annex A: Schedule of Changes.***

4. Development Strategy and Level of Housing Provision

Policy CP 4: Housing Provision

Policy CP 9: Managing the Release of Housing Land

Annex: Horsham District Housing Trajectory

- 4.1 Originating from the very broad vision of the Community Strategy, Spatial Objective 4 is to provide for a sufficient number of dwellings to meet the requirements of regional planning policy to 2018, including that specified by the SP 2001-2016. CP 4 thus sets out the total housing requirement for the plan period, itemising the contributions to be made by the constituent sources of supply. A small element of double counting was identified during the Examination and the necessary change is recommended, together with updated data, making this aspect sound under Tests 4 and 7. The Annex to the CS illustrates the Trajectory for the 1999 to 2018 period.
- 4.2 CP 9 commits the Council to monitoring and managing the housing land supply. We agree that the review of the CS, following final publication on the SEP programmed for 2008, will be the occasion to carefully and comprehensively examine the land supply position. As the draft SEP proposes a similar annual house building rate to the adopted SP (but expressed in net rather than gross terms), we find no serious flaw in extrapolating this SP figure to 2018

to provide at least a 10 year horizon for the CS as sought by PPS12, thus satisfying Tests 4 and 7. That said, it is highly likely that the draft SEP figure will change before final approval, so whilst giving an indication, it provides no firm basis for refining the SP figure at this stage. The implications for this District of the agreed SEP are matters for the review.

- 4.3 The relationship between future gross and net housing figures will depend on the assumptions made about losses in the existing stock, e.g. demolitions. Whilst these assumptions can be based on past trends, well thought-out variations are likely to be more reliable where more detailed site knowledge is available. We are not convinced that the Council’s assumptions about future demolitions have been shown to be unreasonable (Test 7). Even if this judgement is wrong, we believe that annual monitoring is the proper vehicle to promote action to manage the situation (Tests 8 and 9). Monitoring will also highlight other changes, e.g. significant windfall sites which could render assumptions about losses less significant in the wider picture. The same is true of other assumptions such as the increase, or not, in the number of units per site as a result of the delay in the PPG3 density policy working through the timescale from the grant of planning permission to the completion of homes.
- 4.4 We find no serious fault with the Council’s Urban Housing Potential Study (RDHor10) (Test 7). A cautious approach has been adopted but the Study may still contain sites which landowners are currently unwilling to see developed for housing. However, the Council is aware of these and, as a last resort, has powers to acquire. On the other hand, there are known potential windfall sites which have not been included in this edition of the Study and may well come forward if and when circumstances become more certain.
- 4.5 With a current figure of 45% of the housing provision to be provided on brownfield sites, there may well be opportunities to increase this proportion which is some 15% below the regional ‘norm’ set out in the emerging SEP. Evidence on current performance from surrounding Authorities indicate an annual provision of housing on brownfield land well above the 60% threshold, adding credence to the view that the Council’s forecast may be too conservative. However, past performance is not necessarily a sound basis for predictions, and again we consider annual monitoring is the proper basis for any necessary corrective action (Tests 8 and 9).
- 4.6 As set out in Sections 6 and 7 of this Report, we are satisfied that the urban extensions to Crawley and Horsham together are capable of accommodating at least 4,500 homes. Sufficient studies have been carried out to demonstrate that there are no insurmountable technical difficulties over the provision of infrastructure, and that other site constraints can be properly addressed. However, the main question is the deliverability of the housing numbers within the time scale of the CS. As these sites are to provide homes in the mid and later periods of the plan, there will be the opportunity to revisit the assumptions about annual build-out rates as part of the early review of this CS to which the Council is committed. Delivery can then be assessed in the light of the sub-regional role this District will need to play in the period to 2026 and beyond. Thorough annual monitoring will clearly be vital, followed by decisive action if necessary (Tests 8 and 9).
- 4.7 The CS clearly states that any shortfall in the delivery of housing at West of Crawley should not be made up elsewhere in Horsham District. Crawley Borough Council takes a similar view in its submitted CS. This urban extension is identified in the SP as associated primarily with supporting economic growth in the north east of the County in the Crawley / Gatwick area as part of the Western Policy Area defined in RPG9 (Policy LOC1(b)(2) and ¶ 82). Thus to pursue another strategy, e.g. dispersing housing to other towns, or to one town some distance from Crawley / Gatwick, would be contrary to Regional and SP strategy. Such an approach would be likely to increase the need to travel greater distances, particularly by private car, contrary to PPG13 guidance and fail to achieve sustainable development. If the delivery of homes West of Crawley falters, then there will be a need for action on the part of all those authorities in the Crawley / Gatwick Area sub region to resolve the shortage, not just this District in isolation.
- 4.8 The Housing Trajectory in the Annex to the submitted CS specifically omitted reference to 2,500 homes West of Crawley consistent with the approach outlined in ¶ 4.7 above. This demonstrated that cumulative house completions for the full plan period would run ahead of the annualised strategic requirement until about 2015/16. This was revised during the Examination to take account of the double counting mentioned above, updated data, and to

express the information in net as well as gross terms. The revised Trajectory demonstrates that on this basis there is neither a significant housing shortfall nor an overall contingency allowance of any consequence when West of Crawley is considered as a separate project.

- 4.9 Also submitted during the Examination was a Trajectory for the District as a whole. This demonstrated the effect of the West of Crawley Strategic Location not contributing new homes until 2010/11, which is the likely earliest start date. Consequently, although the overall 10 year housing requirement would be met, there would be significant shortfalls in the middle years of the plan period as measured against the annualised requirement. Whilst we consider it would be right to include both Trajectories in the CS, and carefully monitor both, we consider an exceptional approach is necessary here in the particular and unusual circumstances relating to the role of the West of Crawley Strategic Location.
- 4.10 Three factors lead us to conclude that the West of Crawley Strategic Location should be considered separately, and is a sound approach under Test 7. Firstly, as explained in ¶ 4.7 above, there is the strategic economic role of this proposed urban extension. It is in part a consequence of historic administrative boundaries that this essentially Crawley-related new neighbourhood is to be in the adjoining Council’s area.
- 4.11 Secondly, to identify additional sites for a significant number of new homes for development over the next 5 years could put at risk the successful delivery of both the Crawley and Horsham urban extensions and dilute the priority for using PDL, creating a different strategy to that in the adopted SP and carried through to this CS.
- 4.12 Thirdly, the approved SEP, expected in 2008, will look to 2026. Depending on the role this District will need to play in South-East England, short term allocations now may not form part of, and could severely prejudice, the long term proper planning of this part of West Sussex. Whilst growth at both Southwater and Billingshurst are mentioned in the CS as possible locations post 2018, these will need to be properly assessed with other options in a strategy for 2026 and beyond. Such options may include alternatives currently considered unacceptable or rejected on previous occasions.
- 4.13 Even considering the West of Crawley urban extension as a separate project and monitoring build-out rates against the relevant Trajectory, CP 4 provides little in the way of reasonable flexibility in the event of faltering housing delivery, thus failing Test 9. Although the review of this CS would be underway in 2008, deferring action until then would add two years to the identification and adoption of any necessary reserve sites. So we explored during the Examination whether a suitable “hook” could be provided within CP 4 to enable reserve sites to be included in a subsequent DPD without undermining the Council’s fundamentally sound strategy. This would provide the Council with flexibility to meet ¶ 34 of PPG3 which seeks sufficient sites to be shown on the Proposals Map to accommodate at least the first five years of housing development.
- 4.14 The recommended changes in Annex A to this report are intended to achieve this, leaving it open for the Council to determine whether reserve sites in Category 1 settlements should be identified in the Site Allocations DPD or in a separate DPD. The Council will need to consider this issue in the light of the recently published final version of PPS3, particularly the need for a rolling 5 year housing land programme.

RECOMMENDATIONS:

- 4.15 *Changes are required to make sound the Policy and the reasoned justification by updating and correcting the data to the latest available; introducing the opportunity to include reserve housing sites; including a District wide Housing Trajectory for information purposes, and minor editing as detailed in Annex A: Schedule of Changes.***

5. Built-Up Areas and Previously Developed Land

Policy CP 5

- 5.1 Many of the representations on this policy relate to sites which owners and agents consider should be within defined BUABs. These will be considered at the Examination into Site Specific Allocations of Land DPD and have not been referred to in this Report.
- 5.2 The Council’s fundamental development strategy, in accord with the adopted West Sussex SP and with guidance in PPG3, is to give priority to the reuse of PDL in sustainable locations, followed by the creation of new communities in two urban extensions. Support for the smaller villages will be provided by opportunities, normally within the BUABs of these settlements, for development to meet identified local needs.
- 5.3 This CP thus identifies Horsham, together with the six other smaller towns and larger villages, as the most sustainable locations for the development of PDL – Category 1 settlements. It then goes on to define twenty smaller villages – Category 2 settlements – that have limited services which should accommodate only small-scale development that *addresses specific local needs*. All these identified settlements have BUABs.
- 5.4 This additional criterion for development within Category 2 settlements is a departure from the customary policy basis that development within BUABs is acceptable in principle. However, it seems to us a sound mechanism for achieving sustainable development in its broadest sense, where local need is demonstrated, and directing most new homes to areas with better accessibility to services, facilities and employment. We do not find this approach over-restrictive, but consistent with the statutory aim of seeking to achieve sustainable development, and thus sound under Tests 4 and 7.
- 5.5 The Council’s categorisation of settlements has been subject to independent review by nationally recognised consultants (RDHor15). They reached the view (p53 chapter 6) that the hierarchy serves the required purpose and there is no compelling reason to re-categorise any of the settlements. The consultants nonetheless highlighted that the basis upon which the hierarchy was developed – the *existence* of services and employment rather than their *use* by local residents – has significant shortcomings.
- 5.6 Within both categories there are considerable differences in the size of the settlements and in the level of services and employment available. Horsham town clearly heads any list and Billingshurst and Pulborough have the advantage of a main line rail service. However, this should be seen in the context of an objective in PPG13 to reduce the need to travel and public transport nodes being the final locational criterion in the search sequence in ¶ 30 of PPG3. The level of services in the other four settlements in Category 1 seem to us to justify a recognition of a level of sustainability capable of supporting modest future growth, mainly by infilling and redevelopment within the BUABs.
- 5.7 Whilst recognising that Horsham town is dominant within the District, we believe little would be gained in the delivery of policy by giving it a separate status to the other Category 1 settlements. When and if necessary it can be mentioned specifically by name to differentiate its role from the other larger settlements. Overall we find no convincing evidence that challenges the consultants’ findings about Category 1 settlements, with one exception.
- 5.8 Broadbridge Heath is listed as a Category 2 settlement, rightfully reflecting its current role. However, in accordance with this CS, over the next 10 years it will accommodate major new housing growth and provide significantly improved facilities. We appreciate the Council’s approach of delaying a re-categorisation at least until the review of the CS, by which time the masterplanning process will have provided more certainty. But we believe this to be overcautious and does not satisfy Test 7. Proposals under CP 7 would be incompatible with Category 2 status and thus unsound under Test 6. As a matter of clarification of Broadbridge Heath’s future role, we recommend that it should be listed now as a Category 1 settlement. Development within the BUAB would not then be subject to the “local needs” criterion.
- 5.9 Turning to Partridge Green, there seems to us to be a considerable difference in both size and the level of services and facilities available when compared with the seven Category 1

settlements. Its level of trip containment is lower than all Category 1 settlements, save Southwater. On the information available we see no sensible justification for moving Partridge Green to Category 1.

- 5.10 The consultants also emphasised the need for development in Category 2 settlements to be strongly justified by both sustainability and need criteria. As a consequence, the Council added a “local needs” definition to CP 5 which we consider helpful to decision making. We do not consider this to be too restrictive if genuine sustainable development is to be achieved.
- 5.11 We strongly support the view that development in Category 2 settlements must be supported by robust evidence of local need and proper analysis that the proposed development would actually achieve the desired outcomes. We accept that Parish Plans prepared by the local community have an important role to play. Nevertheless the links between new housing and how it would support local services, and the extent to which new enterprises will employ local people need to be properly justified and thoroughly tested.
- 5.12 The consultants draw attention to the dearth of research into whether new development actually improves or maintains the sustainability of rural settlements, a matter highlighted in work by the University of the West of England³. Nonetheless we find the underlying aim to improve the sustainability of rural areas to be sound under Tests 4, 6 and 7.
- 5.13 Monks Gate, Coolham and Five Oaks are small rural settlements with very limited services and facilities. We agree with the Council and their consultants that these should not be included in the list of Category 2 settlements: they are intrinsically unsustainable.
- 5.14 The criteria referred to in the bullet points listed in this CP duplicate matters found elsewhere in the document e.g. CPs 1, 3 and 13, so failing Test 7. Whilst recognising their importance, the Council’s stated intention is to achieve focused, spatial and succinct CPs, devoid of clutter. We therefore recommend their deletion, not in any way to devalue their worth, but to remove unnecessary duplication in a *strategy* which should be read as a whole.
- 5.15 The text which follows “Category 1 Settlements” and “Category 2 Settlements” refers to “some expansion” and “or minor extensions”. Although this may appear at first sight to be inconsistent with the title of this CP, which refers specifically to built-up areas and PDL, it leaves open the opportunity for greenfield sites to be included within BUABs of Category 1 settlements when justified, for example West of Horsham. It also recognises that there may be occasions – rarely in our view – where minor extensions on to greenfield sites would be acceptable within the BUABs of Category 2 settlements, when properly justified by demonstrated local need. This links to Policy CP 8, “Small Scale ‘Greenfield’ Sites” but its inclusion in CP 5 in our view rightly expresses the intentions of this CP. It provides flexibility under Test 9 and would fail to openly express the Council’s intentions if omitted. We consider the approach sound.

RECOMMENDATIONS:

- 5.16 *Changes are required to make sound the Policy and the reasoned justification by re-categorising Broadbridge Heath, removing duplicated criteria and other minor editing as detailed in Annex A: Schedule of Changes.***

³ Are Villages Sustainable? A Review of the Literature: Countryside Agency 2001

6. Strategic Location – West of Crawley

Policy CP 6

- 6.1 This CP provides for the strategic location of some 2,500 homes on an area of land to the west of Crawley, the exact details of which are to be examined in a separate DPD – the Joint Action Area Plan for Land West and North West of Crawley.

Location, numbers and delivery

- 6.2 The CP location shown on the Key Diagram and the Proposals Map reflects the SP [policy LOC1(b)(2)(i)] and the draft SEP (policy GAT2) for a residential development primarily associated with growth in the Crawley/Gatwick area. We agree with its broad location as the study area for the AAP forms a broad logical location defined by recognisable physical boundaries. However, it was said that certain parts of the land, such as the golf course or the land south of the railway line, should be excluded from the study area. We, however, agree with the Council that it would be premature to remove these or any other specific areas of land from the AAP study area in the CS. That is a matter for detailed consideration in the AAP, and we do not have sufficient information at this stage to justify their exclusion.
- 6.3 The evidence indicates that the study area would be capable of accommodating 2,500 homes, or perhaps even more. Some investigative work has already been undertaken by the responsible authorities and potential developers into the infrastructure and other constraints that might affect development within the study area. All of this evidence suggests that, even with the admitted constraints (such as flood areas and airport noise), the projected housing numbers would be capable of being achieved. No conclusive contrary evidence was submitted. This aspect would meet Test 7.
- 6.4 The main question is the deliverability of the housing numbers within the time scale of the CS. This is a large site with many land ownership, landscape and infrastructure problems and concerns. All of the constraints have been sufficiently assessed to satisfy the broad strategic principle of development at this stage in a CS. It will require further study in the AAP before any planning applications can be submitted. Consequently, it will take time for development to come “on stream”, and over time the conditions for house sales (e.g. the economy and competitive sites) may change. In addition, this is a large site and it is not certain that the Council’s suggested build rate (some 312 homes per annum or 12.5% per annum) would be achievable. Figures given in evidence of possible shortfalls appear to us to be conjectural and not soundly based. Even so, we accept that it is difficult at this stage to predict with confidence whether or not the Council’s Housing Trajectory is correct.
- 6.5 However, there are three factors which indicate to us that this CP is basically sound under Test 7 despite these doubts. Firstly, figures produced show that past nearby private sector housing developments have had good rates of build, such as those at North Horsham and Maidenbower in Crawley, achieving sales close in annual percentage terms to this site (10% and 9% respectively). Secondly, these previous sites (Maidenbower was cited as an example) were primarily for private homes, whereas 40% of the homes on this site would be for affordable housing which would be far less reliant on the private housing market. Thirdly, the CS’s monitoring provision and the fact that it will shortly be reviewed under the LDS means that any changes can be quickly seen and so corrective action can be taken.
- 6.6 For reasons that we explain in Section 4, we accept the CP’s stipulation that development here is to solely meet the growth and development needs of Crawley. Therefore, there is no need to bring forward an early phase of development in order to try to establish some sort of priority over other development proposed to the West of Horsham.

Development Principles

- 6.7 The second bullet point of the CP is clear in setting out the neighbourhood principle and the sort of mixed uses which might be found within one. It does not, in our view, imply or mean that only one neighbourhood should be constructed. That is for the AAP to determine.

Defensible Boundary

- 6.8 We believe that the Council is right to require a firm western edge boundary which can be defended against further development and so set long term limits for the westward expansion of Crawley. No convincing case has been made to us for keeping this boundary open, such as possible future housing need. Moreover, there are very good landscape reasons for having such a requirement, such as preventing incursion into and damage to the rural area. We welcome the clarification that the Council has suggested be made to the third bullet point on how the sense of separation between Horsham and Crawley should be maintained, but we see no reason to delete the reference to the Strategic Gap as it is shown diagrammatically on the Key Diagram and is referred to in CP 1 (Tests 7 and 9). The exact boundaries of the Strategic Gap should be decided in the DC Policies DPD.

Transport

- 6.9 The SP requires the construction of a western relief road as part of this proposal (NE17), but we agree with those who said that Government policy has significantly changed since its preparation so that there is now an increasing emphasis on sustainable transport measures to encourage a modal shift away from the private car. And strict conformity with the SP on this point is not required. Therefore the Council is right to say that the need for a western relief road should be re-examined as part of the AAP. It may or may not now be necessary (Tests 4 and 7). But the CP fails Test 7 as it should specifically state this principle.
- 6.10 In general, the transport requirements are proportionate to the proposal, clear, and would reflect national planning policy for sustainable travel, satisfying Tests 4 and 7. The SP also requires an interchange station here [NE21(b)(5)]. We agree with the Council that there may now be other options of achieving sustainable transport provision, and that the proposal should not be limited to just one main option. Moreover, the implications of an interchange station should be thoroughly investigated, especially on the stations of Faygate and Ifield. Therefore, in order to make the CP sound under Tests 4 and 7, we support its suggested change to indicate that the AAP should provide transport infrastructure that maximises sustainable travel, which might include a new interchange station.

Employment

- 6.11 The CP makes reference to Crawley, and we are satisfied that this also includes Gatwick (as in the SP) as it lies within the Borough. The SP makes reference to employment here (NE7 and ¶ 176) that meets the strategic requirements of Crawley/Gatwick, and so we welcome the Council’s suggestion to clarify this matter in the 6th bullet point of the CP. However, the CP can only deal with possible employment allocations within the study area of the AAP, and not outside or related to it, as otherwise it would cause uncertainty and would not fall within the remit of the AAP (Tests 6 and 7). The word “strategic” in the SP does not necessarily mean the same as in the CS sense (PPS12). We believe that these are all matters for the AAP to consider, including whether such employment should be of “high quality”. It is possible that employment might be primarily located near to the airport (in Crawley Borough) where noise levels preclude residential development, but we leave that to the AAP.

Affordable Housing

- 6.12 The affordable housing requirement in the CP for 25% to be socially rented is not justified by any evidence and so fails Test 7. We agree, therefore, with the Council’s suggested change that the amount of affordable housing should be 40% (as set out in CP 12, Chapter 10), but that the tenure should be determined in the AAP taking account of the local housing needs of both Crawley Borough and Horsham District.

Other Matters

- 6.13 There is no need for specific mention in this CP of the need for environmental enhancements or for infrastructure provision. These are covered by CPs 2 and 13 respectively, and the CS should be read as a whole.
- 6.14 The Council explained that its noise threshold level of 60dBA Leq relates to the desirable upper limit for major new noise sensitive development, and that it would not preclude less

noise sensitive development, such as employment, in noisier areas above this limit. This is supported by ¶ 8 of Annex 3 to PPG24, and we do not believe that the submitted evidence overrules that advice. Once this is explained in the bullet point, and also that regard will be paid to Government advice on the subject in deciding development locations, then this aspect of the CP would be sound against Tests 4 and 7.

- 6.15 The principles of development in the CP are repeated in ¶ 4.39. There is no need for this duplication and it adds unnecessarily to the CS, so failing Test 7. Therefore these duplicate bullet points should be deleted.

RECOMMENDATIONS:

- 6.16 *Changes are required to make sound the Policy and reasoned justification concerning the separation between Horsham and Crawley; the investigation of the need for a relief road, the investigation of a new interchange station; the opportunity for employment within the study area; 40% affordable housing with the details to be decided in the Joint AAP; the clarification of the noise contour threshold; and the deletion of duplicated bullet points in ¶ 4.39 – all as detailed in Annex A: Schedule of Changes.***

7. Strategic Location – West of Horsham

Policy CP 7

- 7.1 This CP provides for the strategic location of some 2,000 homes on an area of land to the west of Horsham. It includes some development principles, but leaves the exact details to be defined further in a separate SPD.
- 7.2 We have previously dealt with three matters concerning this CP – overall housing land supply and strategy (with which we broadly agree with the Council – see Section 4); consultation about the proposal (which we concluded satisfied Test 2); and whether it should be a strategic location or allocation (these last two in Section 1). On the last matter, we concluded that it could be a strategic allocation with a subsequent SPD master plan, and so we agree with the Council and others who suggested that that should be specifically mentioned. A SPD is part of the LDF process with its own extensive community involvement requirements. The lack of an independent examination does not make the process unsound. We consider that a separate DPD is not required as this would only be necessary for a broader strategic location, which is not what is proposed here.

Location and boundaries

- 7.3 The CP location shown on the Proposals Map roughly reflects the SP [policy LOC1(b)(2)(ii)] and its Key Diagram for residential development and other uses to the west and/or south-west of Horsham. The Council set out good reasons (RDHor22) for excluding other locations around the north, east and south of Horsham that we accept are valid in the context of this CS. Thus, we agree with the Council that this general location is the right one for such development. However, it was said that other nearby areas of land were better suited.
- 7.4 We have examined carefully the evidence put forward by representors and the Council concerning other possible sites to the west, south-west and south of Horsham and around Broadbridge Heath. None of them have the advantages that the CP 7 site would have in terms of cohesiveness; integration and good relationships with the existing urban areas; linkages to the existing settlements (sustainability); accessibility; and (in comparative terms) a lower landscape and built environment impact. In particular, development on land to the north of Broadbridge Heath would reduce the gap between it and Warnham, and development of this size on land to the south of Horsham would unacceptably reduce the important narrow gap between Horsham and Southwater (presently a Strategic Gap).

- 7.5 As we have said in Section 1, the proposed outer boundaries to the CP site are clear and recognisable physical ones (roads, railway and river). In order to satisfy Test 7, we agree with the Council that these should be regarded as long term boundaries that will not be breached, and so the relevant reference in ¶ 4.43 should be included within the CP.

Deliverability and Numbers

- 7.6 As with CP 6 (Section 6) the evidence indicates that the CP 7 site would be capable of accommodating the required number of homes (2,000) or perhaps even more. There is no requirement to limit the numbers to that in the reasoned justification of the SP, which is non-specific in location and has an earlier end date, especially as further assessment work has since been undertaken. The investigative work already undertaken suggests that, even with the constraints (such as flood areas, access, gas main and sewerage works), the projected housing numbers would be capable of being achieved. We are convinced that the infrastructure problems are all capable of resolution. The evidence indicates that wildlife, environmental, habitat and landscape concerns can be resolved.
- 7.7 The main question is the deliverability of the housing numbers within the time scale of the CS, and the five year requirement in PPG3 (¶ 34). Although doubts were expressed, there was no persuasive evidence which showed that the Council’s figures were not achievable. We recognise that this is a large site with many infrastructure challenges, not least of which will be the transportation/access arrangements. But, as we have said in previous Sections (particularly Section 4), our recommendation for a reserve land flexibility, the CS’s monitoring provision, and the fact that the CS will shortly be reviewed under the LDS means that any possible shortfalls can be assessed and corrective action taken quickly.
- 7.8 Whilst it is possible that more than 2,000 homes could be accommodated here, we do not think that a possible increase should be catered for in the CP, nor is there any justification for stipulating higher than normal densities. The CP should set out only the amount of homes necessary to meet requirements to 2018, and any changes should be dealt with by the monitoring process or in the forthcoming review of the CS.
- 7.9 There were concerns about flooding, mains water, road noise, former landfill contamination off-site, sewerage smells, and aircraft flight paths (Wellcross Farm), but all of these are capable of resolution without any need for special measures. There was no evidence from the responsible authorities that specific allocations for health facilities or schools, beyond those needed for this proposal, should be made in the CS.

Employment

- 7.10 As we remark in Section 9, we were not persuaded that the CP 7 site should have a significant or defined amount of employment land. The CP fails Test 7 as any employment land there should, as the Council’s change suggested, merely provide the opportunity of working locally (and not provide more generally for the District’s economy), with the exact details being resolved through the forthcoming SPD master planning exercise.

Access and Transportation

- 7.11 A new junction would be needed onto the A24 to serve the CP 7 site on both sides of this road. We agree with the suggested change by the Council and others to the supporting text to say that some additional land outside the site may be necessary. Test 9 is not met as there is a possibility (disputed by the Council) that the junction will not need to be grade separated, and so this requirement should be removed and the matter resolved in the SPD. We appreciate that the changed access arrangements will involve a longer route for some, but that does not make it unsustainable or unsound. There is flexibility in the CP to either close or retain (“downgrade”) the by-pass.
- 7.12 We are satisfied that the appropriate traffic modelling technique has been used in assessing the traffic implications of this proposal. Hill Farm Lane would be capable of taking the limited additional access requirements demanded of it. We are also satisfied that multi-modal transport measures can be provided to ensure sustainable transport, and that adequate infrastructure will result in an acceptable traffic impact, including that on the motorway and trunk network. On the former point, the SP requires a rail interchange

(NE21) but we accept that subsequent work by the Council and others showed that this would not be achievable due to its closeness to the Christ’s Hospital station and its lack of financial viability. So we agree with the suggested change that a high quality bus link to the town centre and Horsham station should be provided.

- 7.13 In the Council’s study on the subject (RDHor13), a Park and Ride facility here is stated not to be urgent or needed within time period of the CS. As the evidence base does not support its inclusion within the CS it should be deleted (Test 7).

Other Matters

- 7.14 The principles of development in the CP are repeated in ¶ 4.41. There is no need for this duplication and it adds unnecessarily to the CS. Therefore, as in Section 6, in order to meet Test 7 these duplicate bullet points should be deleted. Similarly, affordable housing is dealt with in CP 12, and its repetition here is therefore not needed.
- 7.15 The CP makes provision for Broadbridge Heath and Horsham Football Clubs, which would need to have two separate grounds. Unlike Broadbridge, the need for the Horsham ground is not directly related to the CP 7 development – it arises from the Horsham club having sold its ground for other development. The CP should make this clear under Test 7.
- 7.16 We welcome the Council’s suggested change to make it clear that there will be improved shopping facilities to meet the additional needs of the expanded communities (Test 7).
- 7.17 There is no need for specific mention in this CP of the need for environmental enhancements, infrastructure provision, or for avoiding flood risk areas. These are covered by CPs 2 and 13 respectively (and in national guidance), and the CS should be read as a whole.
- 7.18 The CP already recognises the need to take account of the separate identities of the Horsham and Broadbridge Heath communities. We are satisfied from this, and the physical relationships of the different parts of the allocation, that positive measures to prevent coalescence can be set out in the SPD Master Plan.

RECOMMENDATIONS:

- 7.19 *Changes are required to make sound the Policy and reasoned justification concerning; the specific mention of a SPD; bringing into the Policy boundary requirements from ¶ 4.43; minor changes to the A24 junction requirements; the deletion of the Park and Ride facility; clarifying that employment is for local purposes; the deletion of duplicated bullet points in ¶ 4.41; the deletion of duplicated affordable housing ; clarification about the Horsham Football Club ground; an additional point about retail facilities; and minor editing changes – all as detailed in Annex A: Schedule of Changes.***

8. Small Scale ‘Greenfield’ Sites

Policy CP 8

- 8.1 The SP allows for limited small-scale gradual growth in some villages and small towns to meet identified needs and support local facilities and services (Policy LOC1(c) and ¶s 93 and 94). This CP, together with CP 5 dealing with PDL, applies this principle at the local level, supported by PPS7 (particularly ¶ 4) although this must be seen as advice in the national context of “rural” which may not be wholly applicable in South-East England (Test 4). Most parts of this District are within 4 miles of a Category 1 settlement with its range of services. We discuss earlier in ¶s 5.10 and 5.11 of this Report that development in Category 2 settlements needs to be properly justified. To this end ¶ 2 of PPS7 draws attention to the need to consider commissioning surveys and assessments of rural economic and social conditions and needs.

- 8.2 Both ¶ 4.46 and CP 8 were drafted in the context of the CS and Site Allocations DPDs being submitted at the same time. As the latter will now be considered later, and as a result of the discussion at the hearing session, the Council prepared an edited version of both the reasoned justification and the CP, deleting reference to matters which are properly the province of the Site Allocations DPD, overcoming the inherent unsoundness under Tests 6 and 7. We broadly agree with these changes which do not change the strategy and recommend accordingly, subject to the points below.
- 8.3 As discussed earlier in ¶ 5.10 regarding Policy CP 5, we agree with the Council’s consultants’ strong advice that “local needs” should be defined, and thus we recommend the suggested addition by the Council of a similar definition under CP 8. However, we consider the reasoned justification should be strengthened to underline the need for proper evidence, which may involve new studies, to justify proposals which aim to support local services or provide jobs for local people. Important decisions on sustainable development should not be based on assertions. We accept that each settlement will need to be considered individually as “one size” will not “fit all”. But the criterion in the local needs definition “. . . will not reinforce unsustainable patterns” is vitally important.
- 8.4 The second sentence of the CP was criticised as representing a loophole in the stated intent of the policy. However, the revised version of CP 8 makes it clear that small scale greenfield sites will normally be specified in the Site Allocations DPD. But to provide flexibility the second sentence allows, exceptionally, for the positive consideration of beneficial proposals which arise outside the context of the DPD. We consider this a satisfactory way to achieve the reasonable flexibility sought under Test 9, and read in the context of the CS as a whole it cannot be regarded as a loophole.
- 8.5 There is variation in the popular dictionary definitions of “environment”, and we agree with the Council that to narrow this to referring only to the natural world could be misleading. We prefer the wider, simpler and well understood definition – “surroundings”. As discussed in ¶ 12.3, we do not consider the use of “environmental” in this CS will lead to unpredictable and harmful decisions: the policy aim is clear.
- 8.6 Subject to the changes we recommend, we consider this CP, together with its reasoned justification, satisfies all the relevant Tests.

RECOMMENDATIONS:

- 8.7 *Changes are required to make sound the reasoned justification and Policy by deleting details which should be in subsequent Development Plan Documents, defining ‘local need’, emphasising the necessity for adequate evidence and minor editing as detailed in Annex A: Schedule of Changes.***

9. Employment Provision including Sites and Premises

Policy CP 10: Employment Provision

Policy CP 11: Employment Sites and Premises

- 9.1 These two policies set out the basic approach to the location and provision of employment land, the types and sizes of future employment premises and sites, and the protection of existing employment sites and premises. The basis for the amount of employment floorspace provision is derived from two main sources – SP policy NE1 and the Council’s Employment Land Review (RDSx5). We are satisfied that the Review has been carried out in accordance with Government advice in Employment Land Reviews: Guidance Note (RDNat25). We have seen no evidence that would cause us to doubt the main thrust of the Review’s conclusions, and we are satisfied that the Review has been competently carried out with regard to various technical matters such as supply, vacancy and qualitative assessment.

9.2 However, we are concerned that the two CPs do not identify the requirements of the principal market segments or sectors (or any other specialised requirements). Only a “global total” is indicated in CP 10, and it is not broken down into segment needs (e.g. offices). A partial solution is arrived at by assessing provision against the Employment Land Review and monitoring the needs of the local economy (CP 11), and by further detailed assessment in SPDs and DPDs (CP 10). Given the early review of the CS in the LDS, we are satisfied that this is a reasonable short term solution which can be reassessed in that review.

CP 10

9.3 The Review’s conclusion was that the quantitative employment floorspace figure should be 210,000 square metres and not the 215,000 square metres stated in the CP, and so we agree with the Council’s suggestion to alter this figure accordingly. This is not a target but a broad guide or yardstick, as stated in the reasoned justification. And we agree with the Council that the Government’s preferred method of expressing future quantitative employment needs is by floorspace and not by job numbers.

9.4 It is clear from the Review that the total potential employment land within the District would greatly exceed the identified employment land requirement, and that a couple of the larger sites would meet that need (¶s 8.60 and 8.61). We agree with the Review that it is not desirable to rely on a few large sites as this would restrict choice and mix, prevent the upgrading or redevelopment of existing sites, and prevent the achievement of other objectives, such as regeneration and restoration. However, it is clear that the Council will need to carefully consider in future DPDs and SPDs how to balance these conflicting priorities whilst not unacceptably exceeding the stated employment floorspace level and/or not compromising other strategic CS objectives, particularly Spatial Objective 9 of reducing car based travel.

9.5 In the light of the above and the evidence in the Review, we were not persuaded that the West of Horsham site should have a significant or defined amount of employment land. Any employment land there should, as the Council clarified in its suggested change, merely provide the opportunity of working locally (and not provide more generally for the District’s economy), with the exact details being resolved through the forthcoming SPD master planning exercise (see Section 7).

9.6 On the West of Crawley site there will be a balance to be struck in terms of the location of any employment land (which may well be mainly in Crawley Borough) and in the proportions designed to serve either of the two Council areas, the Crawley/Gatwick area, or the needs of the site itself (¶ 119 of the SP). So, bearing in mind that the West of Crawley site will be the subject of a separate DPD (the Joint Action Area Plan - see Section 6), we do not believe it to be the place of this CS to define the exact amount or location of employment land there. These detailed matters should be left to that DPD, which would have to take account of the CPs and objectives in this CS.

9.7 The SP makes reference to *high quality* employment uses on the West of Crawley site, although this is not in the actual policy itself (NE7), but in the reasoned justification (¶s 82 & 176). We are not convinced that the evidence, especially that contained in the Review, justifies placing this restriction on employment land there. Rather, we believe that the type and nature of the employment land on this site should be resolved through its separate DPD. However, in order for the CP to meet Test 7, we agree with the thrust of the Council’s proposed change to the CP that this site and that of West of Horsham should be separated and that the above points should be explained. Similarly, the use of the words “related to” are imprecise and so should be deleted.

9.8 The CP makes reference to three specific sites – Brinsbury, Warnham and Wealden Brickworks, and Shoreham Cement Works. The Council’s evidence was that the CP was not identifying strategic employment locations in a PPS12 sense, but that these were opportunity sites of employment significance for the Council due to site specific special circumstances. In the case of Brinsbury, the specific circumstance was the need for training and educational related private enterprises consistent with the land based educational uses currently provided by Chichester College on the campus, in support of the educational function there. For Warnham and Wealden it was the need to make use of the PDL associated with the brickworks. For Shoreham, it was the need to ensure the landscape restoration of this large

redundant industrial facility within the Sussex Downs AONB and to help the economic regeneration of the Sussex Coast area (see policy NE6 and ¶s 169 to 173 of the SP).

- 9.9 Brinsbury was not considered or assessed in the Employment Land Review. The SA (RDHor17) reveals damaging impacts on the landscape, increased car travel and freight traffic use, and other adverse impacts. Balanced against this is the Council’s desire to secure Brinsbury’s long term financial viability and future by updating and expanding its facilities, curriculum and resources. Links with external partners providing additional employment uses are seen as the key to achieving this objective, but the evidence for this was thin and unsubstantiated. The extent of the desired objective was itself undefined – there was no information as to how much updating and expansion would be required, nor (as a consequence) any evidence on the necessary amount, location, size and impact of the partner employment uses to achieve that objective. We do not know the importance of Brinsbury to the District or the significance of its role within the District, sub-region or region. Without this information we find it impossible to judge whether the Council has made the right decision to include this site in the CS. Given the above, this part of the CP fails Tests 4 and 7.
- 9.10 In addition, we are not convinced that what would seem (from the available evidence) to be a fairly limited employment proposal would have sufficient strategic significance for it to be specifically mentioned in the CS. We believe that the proper place for this proposal is within the Site Allocations DPD (it is included at AL 14 in the Submission Document of that DPD), back up by a proper evidence base. So it should be deleted from the CP.
- 9.11 Warnham and Wealden Brickworks was assessed in the Employment Land Review, but the area of land considered for employment was relatively small (under 4 hectares). The site would, according to the SA, perpetuate unsustainable travel patterns and harm the landscape, but balanced against that would be the clearance of contamination (along with a waste recycling facility benefit) and the PDL nature of the site. There was no evidence from the Council as to the extent of the contamination to be cleared away, the amount of land (if any) that could properly be regarded as PDL, the approximate size of any likely employment allocation here, or the amount of traffic likely to be generated by any proposal on the site compared to existing or historic traffic levels.
- 9.12 In short, there is a distinct lack of any evidence base to justify the strategic allocation of the site in the CS given the harmful effects identified in the SA. We are not convinced that the site should be specifically mentioned in the CS given this lack. Again, we believe that the proper place for this proposal is in the Site Allocations DPD where the evidence we have noted above (and more) would have to be provided to justify its inclusion. Therefore this part of the CP fails Tests 4 and 7 and so it should be deleted from the CP.
- 9.13 Shoreham Cement Works is, as noted above, a commitment in the SP. Such sites should be “unlocked” under the provisions of policy SCT3 in the draft SEP. It is a very large site as assessed in the Employment Land Review and proposed to be allocated in the Site Allocations DPD at AL 15. We agree with the assessment in the SA. The site is of strategic employment significance due to its location and size, and also its importance in AONB landscape restoration and South Coast regeneration terms, and so it should remain in the CS. We agree with the Council’s suggestion to explain these points in the CP, and to include the possibility of leisure uses (see Section 16). It may well be that the Council should consider a SPD for this site (and also for the Brinsbury & Warnham and Wealden sites) but this is a matter for the Site Allocations DPD.
- 9.14 Given that some employment provision will include sites which are to be allocated in the Site Allocations DPD, this should be made a separate point in the CP so that it meets Test 7.
- 9.15 We agree with the Council’s suggested change to point ii. to make the meaning of “extensions” clearer, although it needs further alteration to make it clear that such extensions are either to existing buildings or to sites within the boundaries of an existing industrial estate. On point vii. we are satisfied that retaining the word “agricultural” in the overall context would comply with PPS7 advice and so no consequential change is required to paragraph 4.49. Affordable housing is dealt with in Section 10, but we are not convinced from the evidence that employment development is normally directly related to housing – employment is usually provided for local residents.

- 9.16 We agree with the Council’s suggestion to delete the last sentence of the following reasoned justification as the Plan should be read as a whole. Also, as the Council has recognised, consequential changes to the reasoned justification flowing from all of the above recommendations will be required. The forthcoming review of the CS will also provide an opportunity to re-examine this CP, but it does not need to be specifically mentioned.

CP 11

- 9.17 Whether sites are sufficiently sustainable to achieve allocation or permission, the types of employment uses, and their precise distribution (apart from Shoreham) are all matters for other DPDs which will use this CP and CP 10 as the basis for assessment. We had no evidence that land for particular types of employment uses, such as so-called “dirty businesses”, needs to be resolved in this CS.
- 9.18 This CP is the source for Employment Protection Zones which are to be individually defined in another DPD, but it fails Test 9 as it does not set out any selection criteria for them. We therefore welcome the Council’s suggested changes to the CP and the reasoned justification which together rectify that failure.
- 9.19 Many of the representations on these CPs concerned specific sites at locations such as Pulborough, Sullington, Henfield, Parsonage Farm (Horsham) and Billingshurst. We agree with the Council that these matters are best addressed in the Site Allocations DPD Examination, and that they are not of strategic significance for inclusion in this CS.
- 9.20 The monitoring chapter will need to be altered as a result of the above – the target of no loss of floorspace in Employment Protection Zones and the 300 square metre unit increase are not reflected in the Policies or reasoned justification, and so should be deleted.

RECOMMENDATIONS:

- 9.21 *Changes are required to make sound the Policies reasoned justifications and monitoring table by altering the development floorspace to 210,000 square metres; clarifying “extensions”; examining West of Crawley employment needs (including for Crawley/Gatwick) in the Joint AAP; examining West of Horsham local employment needs in the SPD masterplan; clarifying the details of the Shoreham Cement works development; deleting the Brinsbury College and the Warnham Brickworks sites; indicating that employment development will be allocated in the Site Allocations DPD; indicating how Employment Protection Zones will be defined; and deleting the reference to environmental matters in the reasoned justification – all as set out in Annex A: Schedule of Changes.***

10. Meeting Housing Need

Policy CP 12

- 10.1 The opportunity for everyone to have a secure, affordable and pleasant home is an aim of the Community Strategy, an aspiration shared in numerous Government policy statements. Spatial Objective 6 in the CS is “To meet the diverse needs of communities . . . in the District.”
- 10.2 Circular 5/2005 at ¶ B13 (and draft PPS3 at ¶ 28) make it clear that affordable housing policies should be included in LDFs, but without specifying in which type of Document. It is thus for the Council to decide how best to communicate its policies. We find no fault in CP 12 setting out the fundamental thresholds and delegating the delivery details to either a subsequent DPD or SPD. We accept the latter would not be subject to independent examination but it would be an unwise Council that adopted policies and procedures that were unreasonable or in clear conflict with up-to-date national guidance.

- 10.3 The Council commissioned nationally recognised consultants to undertake a Housing Needs Survey in 2003 (RDHor9), and this was updated in 2006 (RDHor33). We have seen no evidence that circumstances have changed so radically since 2003 to undermine the validity of this survey or that the update in 2006 was inadequate in any material way. We agree that assessments of this type have a typical life expectancy of about 5 years, with a mid point review able to monitor the credibility of the conclusions. There was no authoritative national guidance on Housing Market Assessments prior to the submission of this CS, or available during the hearing sessions, and this more recent type of Assessment will be therefore a matter for the review of the CS to which the Council is committed.
- 10.4 The fundamental point arising from the 2003 Survey and 2006 update is that the need for affordable housing in this District significantly outstrips the number of such homes that could realistically be provided. We have seen no evidence of substance that challenges this fundamental point. Thus esoteric arguments about assessment techniques are irrelevant.
- 10.5 CP 12 follows the 2003 consultant’s report which recommended a target of 40% for the provision of affordable homes on sites of 15 or more dwellings, a position reaffirmed in the 2006 update. Such thresholds are now commonplace in south-east England and elsewhere, and the desperate need for affordable homes here is clear from the evidence. The SP indicates that the proportion of subsidised housing should be in the order of 30-40% of *total* dwellings, which implies a requirement at or above the upper figure for qualifying sites.
- 10.6 To assess the possible implications for these thresholds on land values and delivery, the Council commissioned local consultants to examine the potential deterrent effect on owners bringing land forward for housing development (RDHor16). The consultants concluded that there could be a reduction of up to 60% in residual land values but nonetheless, given the high development values in this District, the proposed thresholds should be workable and deliver the sought increase in affordable homes. But given the need for an adjustment period, we agree that this increase in affordable homes may not be immediate.
- 10.7 However, the consultants cautioned that delivery was dependant upon the Council adopting and practising a genuinely adaptable and practical negotiating approach with developers. That in turn requires open discussions on all sides and ¶s 4.52 to 4.55 of the written justification sets out an encouraging degree of flexibility that should ensure sensible and sound procedures in the adopted SPD dealing with affordable housing. All sites are different and CP 12 and the reasoned justification clearly recognise this but nonetheless sets *targets* as essential baselines.
- 10.8 Notwithstanding Circular 6/98 (now withdrawn by PPS3), we have no convincing reasons to find these aspects of the CP unsound under any of the appropriate Tests. The Government’s current intentions are evident from ¶ 23ff of draft PPS3.
- 10.9 The draft SEP at Policy H4 seeks a regional target that 25% of *all* new housing should be socially rented accommodation and 10% other forms of affordable housing, subject to confirmation by local need and market assessments. The overall target for the Gatwick Area Sub-region is 5% higher at 40%. These proportions have still to be subject to independent Examination, but give an indication of SEERA’s approach. We agree with the Council that having set out a 40% target for affordable housing on qualifying sites in the CP, any detailed division about tenure could be included in the reasoned justification. However, this is currently expressed as a target (which could be within the policy itself) without suitable caveats about the need to examine current local need on a site-by-site basis. To overcome conflict with Tests 4 and 7, we thus recommend the addition of suitable text to the reasoned justification.
- 10.10 We find an inconsistency between CP 12 and CPs 5 and 8 in the policy approach to housing in villages below 3,000 population – essentially Category 2 settlements (Test 6). CPs 5 and 8 expressly limit development in these villages to that which addresses local needs, whilst CP 12 implies a more liberal approach to small schemes for market housing, from which an affordable component will be required. The most common local need is likely to be for affordable housing, for example to enable local family cohesion to continue into the next generation. Thus it is probable that the Council will be faced with proposals for affordable housing as part of mixed tenure schemes in settlements with very limited facilities and inherently unsustainable in terms of the guidance in PPG13. This may be satisfactory where

schemes can demonstrate that other local needs would be met, but otherwise could give rise to a dilemma for decision makers.

- 10.11 The 2005 update to PPG3 paved the way for the allocation of sites in small rural communities solely for affordable housing. We appreciate the Council’s experience to date has not been encouraging with the potential delivery of these ‘rural exception sites’, but this is not to be unexpected in the early days of a radical departure from previous national guidance. To overcome the lack of soundness under Test 6, we recommend changes to CP 12 to reflect current national guidance and make it crystal clear that the need for affordable housing in rural areas should be met by schemes solely for this type of housing, unless a mixed use or tenure development can be demonstrated to meet other identified local needs. It may be necessary for the Council to consider using its compulsory purchase powers to ensure local delivery if the expectations of landowners, based on historic land valuations, remain unrealistically high.
- 10.12 The widely distributed letter of 13th March 2006 from the Regional Director, GOSE, confirmed that the Government sees no distinction between proposals for open market sheltered accommodation and any other open market housing in terms of assessing such schemes against affordable housing policies in development plans. We consider Continuing Care Retirement Communities as falling within the broad definition of sheltered housing, although exception would need to be made for accommodation clearly falling within use class C2. Thus there is no conflict on this point with Test 4.
- 10.13 The reasoned justification says that proposals for employment provision or other commercial uses, as well as operations such as nursing homes or large education establishments, will be encouraged to make appropriate contributions towards affordable housing needs, particularly for key workers. There are no national policies supporting or discouraging this approach, which is purely aspirational at this stage. But given the wider mandate for spatial planning under the 2004 Act we consider it inevitable that some policies will be of this type. If broader awareness and coordination is to be achieved, departing from the traditional local plan approach is necessary. Given the relationship between earnings and house prices in this District, we find no evidence that encouraging employers to consider the wider implication of recruitment and retention of their workforces to be unsound under any of the appropriate Tests.

RECOMMENDATIONS:

- 10.14** *Changes are required to make sound the Policy and the reasoned justification by seeking schemes solely for affordable housing in villages, setting out the need for local information to inform decisions on tenure split and other minor editing as detailed in Annex A: Schedule of Changes.*

11. Infrastructure and Community Facilities/Services

Policy CP 13: Infrastructure Requirements

Policy CP 14: Protection and Enhancement of Community Facilities and Services

- 11.1 These two CPs flow from Spatial Objective 6 and seek to secure the improvement and retention of infrastructure, services and community facilities. Unfortunately, it is not clear what is meant by these terms and therefore what exactly each CP is seeking to improve or retain (Test 7). So we agree with the Council’s suggestion that both CPs should refer to revised respective definitions in the Glossary of Infrastructure (CP 13) and Community Services and Facilities (CP 14). These revised definitions seem to us to cover the topics dealt with by these two CPs, and the CS deals with other public infrastructure or service needs elsewhere (e.g. transport in CP 20).

- 11.2 We agree with the Council that in a spatial planning system the CS cannot allocate sites for new hospitals or deal with regional infrastructure, such as water provision, when there is no evidence from the responsible authorities (or from other authoritative sources) that they are actually required. On another point, the CS is not the place to deal with localised, specific infrastructure concerns, such as traffic calming.
- 11.3 We think it right (see ¶ B26 of Circular 05/2005, and ¶s 2.43 and 2.44 of PPS12) that the detailed nature of any financial or other contributions towards necessary infrastructure etc. (CP 13) should not be in the CS but in a separate SPD. Under Test 7, the CP should refer to this. And the SPD would be subject to a rigorous procedure of community involvement (¶ 2.42 of PPS12). CP 13 fails Test 7 in not referring to the provision of utility services, and so we agree with the Council that an additional sentence on this should be added to the end of the CP, subject to such provision meeting the requirements of other relevant policies.
- 11.4 CP 13 deals with all sites, whether allocated or “windfall”, and that is the correct approach. However, it fails Test 7 by not making clear that the Council should work with developers to secure the necessary infrastructure; that such infrastructure should be appropriately programmed (by condition or otherwise); and that infrastructure should be provided prior to the occupation of the relevant phase of the development. With these changes, the CP would also pass Test 4 by being consistent with Government advice, especially that in Circular 05/2005. We are satisfied that the CP adequately covers the protection of local residents’ amenities, and that “contributes” in the first sentence of the reasoned justification is not meant to refer to *financial* contributions.
- 11.5 The CP 14 Glossary redefinition includes open space, sport and recreation facilities, the precise nature and availability of which can be left to Government advice in, for example, PPG17. The last sentences of the two ¶s of the reasoned justification to CP 14 include development control criteria which would be better set out in the CP itself, as the Council suggested (Test 4 – see ¶ 2.31 of PPS12).
- 11.6 The Council suggested a number of acceptable minor changes to the reasoned justification of CP 14 to make it clearer with regard to recreation provision, appropriateness and alternative uses. The Council also suggested inserting the words “where appropriate” in the end of the second paragraph of the CP in order to deal with the situation where an alternative facility is not possible, or perhaps not even needed, e.g. the loss of a public house. But this would still be vague and imprecise. Open space, sports and recreation facilities have a well known and defined methodology for assessment as set out in PPG17 and its Companion Guide. So, instead of “where appropriate”, the CP needs only a slight alteration and re-ordering to clearly apply these principles to other circumstances and so meet Test 7. We are concerned that the various criteria in the CP are probably too detailed to be included within a CS (Tests 6 and 7), but we have decided not to delete them because there will be an early review of the CS, and so this can be resolved by the Council in the near future.

RECOMMENDATIONS:

- 11.7 *Changes are required to make sound the Policies and reasoned justifications by defining the terms; referring to infrastructure contributions in CP 13; complying in CP 13 with Government advice in Circular 05/2005; including reasoned justification criteria in CP 14 itself; clarifying recreation provision, appropriateness and alternative uses in CP 14; and other minor clarification changes, as detailed in Annex A: Schedule of Changes.***

12. Rural Strategy

Policy CP 15:

- 12.1 The delivery of economic, social and environmental benefits to local communities in this predominantly rural District (in a South East England context) is encouraged by the first paragraph of this CP. It then goes on to define broad criteria for development in the

countryside outside defined settlements. The spatial intent of this CP accords with advice in PPS7 and carries forward SP and Regional policies, both extant and emerging. The Countryside Agency’s work entitled Planning for Sustainable Rural Economic Development has also informed this CP. Thus we find no material conflict with Test 4.

- 12.2 We agree with the Council’s suggested changes which clarify to which settlements the policy applies, and to qualify the general phrase “Any development”. To avoid any doubt, we also consider it desirable to add “either” at the end of criterion a. to emphasise that criteria b. or c. must apply in association with a.
- 12.3 We agree in principle with the point that policies should be as clear and as unambiguous as possible in their meaning and that words should be chosen with care. However, policies are not statutes or statutory instruments and should not be subjected to word by word forensic examination for its own sake. It is essential for policies to be read in context and interpreted in a commonsense manner in relation to what is intended to be *achieved*, i.e. the outcome of the policy. On this basis we find no compelling case that the use by the Council of the term “environmental” will lead to the acceptance of proposals that would either unacceptably harm the countryside or conflict with the aim of achieving sustainable development. Again, the CS must be read as a whole and must be seen as the *strategy* from which other policies flow, as required. We also comment on this matter in ¶ 8.5.
- 12.4 There is no basis for adding “quiet” before “recreation” in this CP. PPS7 does not use the term and there are various traditional countryside sports which are anything but “quiet”. We look to the General Development Control Policies DPD to deal with this sort of detail. Similarly, to limit the future use of rural industrial estates to the footprint of existing buildings as a matter of *strategy* we consider would be over-restrictive and inflexible: site specific proposals would need to be assessed against sound development management policies. The same applies to the reuse of “appropriate” rural buildings.
- 12.5 Overall we find this CP sound under Tests 4, 7 and 9, although minor changes would aid its understanding.

RECOMMENDATIONS:

- 12.6 Changes are required to the Policy by defining “smaller towns and villages” and minor editing as detailed in Annex A: Schedule of Changes.**

13. Inclusive Communities

Policy CP 16

- 13.1 With foundations in the Community Strategy and thence the first part of Spatial Objective 6 – “To meet the diverse needs of the community . . .” – this essentially spatial CP draws the attention of decision-makers to these diverse needs so that they are taken into account or, when necessary, promoted. This accords with the guidance in PPS1 and satisfies Test 4.
- 13.2 It is again important to acknowledge that this high level policy sets the scene – the necessary “hooks” – from which more detailed policies, when required, will follow. Taken in context within this CP, we see no difficulty in understanding the term “inclusive” or any commonsense reason why it should result in undesirable change within the District.
- 13.3 It is also essential that the CS is read as a whole and proposals for change will need to satisfy, or be balanced with, all the relevant policies. We agree with the Council that “rural workers”, as a generic term, rightly avoids the need to specify individual occupations. Equally, the needs of an ageing population are adequately covered in this CP without going into excessive detail in a DPD that sets out to be a *strategy*.
- 13.4 The lack of reference to Travelling Showpeople does not mean they have been omitted from consideration. Criterion v. says “, including Gypsies and Travellers” and we understand that

the General Development Control Policies DPD will include reference to the needs of Travelling Showpeople, reinforcing the points in ¶s 13.2 and 13.3 above. Overall we find this CP also satisfies Test 7.

RECOMMENDATION:

- 13.5** *No changes are required to make the Policy and reasoned justification sound, but for consistency with our recommendations in Section 14, delete "(see Policy CP 17 below)" from criterion v.*

14. Gypsy and Traveller Sites

Policy CP 17

- 14.1 This CP makes provision for sites for gypsies and travellers. It is, however, a very vague policy which primarily looks forward to future DPDs.
- 14.2 The Council has stated in its LDS (RDHor26) that it intends to produce a specific Gypsy and Travellers DPD to allocate specific sites, including the provision of a transition site or sites. We note that consultation on the Issues and Options for this DPD is about to be completed. The CP explanatory text also refers to the DC Policies DPD (RDHor59) which contains draft policies on gypsy, traveller, and travelling showpeople proposals (DC 37 and DC 38).
- 14.3 Section 225 of The Housing Act 2004 includes a statutory requirement for all local authorities to undertake an assessment of the accommodation needs of gypsies and travellers residing in or resorting to their district. ODPM Circular 1/2006 (¶ 20) (and the previous Circular 1/94) contain similar requirements. No such needs assessment has been carried out, and so the CP fails Tests 4 and 7.
- 14.4 Circular 1/2006 indicates (¶ 31) that the CS should contain criteria for the location of sites which will be used to guide site allocation in the relevant DPD (the previous Circular 1/94 had similar provisions). The CP does not do this and so fails Test 4. Given this, and the fact that there will be a specific DPD on this topic, the most pragmatic course of action would be to delete the CP so that the needs assessment and site location criteria are set out together in one DPD. Although a separate DPD is not recommended, this method of dealing with the topic would not prejudice the development and implementation of these policies.
- 14.5 As we have noted above, CP 17 is vague, and it does not set any coherent basis for consistency within the future DPDs on this topic, and so it fails Test 6. For this, and all of the above reasons, the CP should be deleted.

RECOMMENDATIONS:

- 14.6** *Changes are required to make the CS sound by deleting CP 17 and references to it, as detailed in Annex A: Schedule of Changes.*

15. Vitality and Viability of Existing Centres

Policy CP 18

- 15.1 This CP essentially deals with retailing and other town centre uses.

- 15.2 Criterion b. of the CP fails Tests 4 and 7, but it can be simply clarified so as to make it sound. Firstly, it does not comply with advice in PPS6 in that, whilst an appropriate upper limit for the scale of development should be set (as done here from evidence in RDHor11), there are a number of other criteria that must be satisfied, not just quantitative need. Criterion b. should say that. It should also make clear that the measurements are gross floorspace, as advised in PPS6. Secondly, it is clear from the context that b. applies to existing town centres, and so it should say that.
- 15.3 Criterion c. also fails Tests 4 and 7 for the same basic reasons.
- 15.4 Criterion d. is related to, and duplicates, changes we have recommended to CP 7 concerning the shopping needs of the West of Horsham area. It should therefore be deleted.
- 15.5 We have seen no evidence, apart from that specifically concerning retail needs in CP 7 West of Horsham (and dealt with there), that would justify the allocation in the CS of any further shopping development in the District. References to maintaining village character and transport accessibility are not needed as they are covered here and elsewhere in the CS.

RECOMMENDATIONS:

- 15.6 *Changes are required to make the Policy sound by altering criteria b. and c. to comply with PPS6; and deleting criteria d. due to duplication, as detailed in Annex A: Schedule of Changes.***

16. Tourism and Cultural Facilities

Policy CP 19

- 16.1 This CP, as it says, deals with tourism and cultural facilities, and so we see no reason to alter its title (or wording) to include “recreation”, especially as this would create confusion with the similar matters covered by CP 14. It fails Test 7 because it is unclear exactly what these facilities are, and so we welcome the Council’s suggestion to add a new definition to the Glossary, and to refer to it in the CP. Likewise, we also welcome the Council’s suggestion of including “business visitors” in the first ¶ of the CP.
- 16.2 It is unclear what is meant by “rural diversification”. So, again, we agree with the Council’s suggestion of a Glossary definition. All of these suggestions are minor clarifications.
- 16.3 We have seen no evidence that would justify the allocation of, or the creation of favourable criteria for, any hotel development outside Horsham town centre. Therefore, the reference in ¶ 4.63 to a possible hotel on the West of Horsham land should be deleted as it fails Test 7. There is uncertainty as to whether the Kings Head Hotel will remain as a hotel, and so the reference to it in that same ¶ and in criterion b. of the CP should also be deleted (Test 7).
- 16.4 It is clear from the evidence that the hotel part of the CP is primarily aimed at Horsham town centre for major (business) hotel proposals, in accordance with PPS6 and the Good Practice Guide on Planning for Tourism, but that other new build accommodation could be envisaged elsewhere in line with ¶ 37 of PPS7 and the Good Practice Guide. Although the CP does not meet Test 4 as it is not clear that this is, in fact, its objective, minor changes to it and to ¶ 4.63 would resolve this.
- 16.5 Criteria e. and f. are, bar one point, duplicates of matters dealt with elsewhere in the CS (which should be read as a whole) and also in Government policy. So they should be deleted. The one exception is the loss of a cultural resource.
- 16.6 The evidence given in relation to Matter 7 and CP 10 was that the Shoreham Cement Works development site will have a major leisure and tourism element. That being the case, in order to meet Test 6 the CP should (as the Council suggested) include a reference to it.

RECOMMENDATIONS:

- 16.7** *Changes are required to make sound the Policy and reasoned justification by defining the terms; deleting references to hotels outside Horsham and retaining the Kings Head Hotel in that town; altering the hotel accommodation criteria to comply with PPG6; removing duplication; and referring to leisure development at Shoreham, as detailed in Annex A: Schedule of Changes.*

17. Managing Travel Demand and Widening Choice of Transport

Policy CP 20

- 17.1 This is a spatial policy which seeks to integrate planning and transport strategies to achieve sustainable development that, amongst other things, reduces reliance on the private car. Such an approach is encouraged by advice in, for example, ¶s 27 and 30 of PPS1 and ¶ 2 of PPG13, and follows from Spatial Objective 9 and the Community Strategy. It also links with Regional and SP policies, The West Sussex Transport Plan and the Horsham Area Transport Plan.
- 17.2 The Council is the car parking authority, is actively involved in rural public transport initiatives, coordinates planning obligations with developers and is thus an important player in the wider transportation function. Thus we agree with the Council that the CS could be viewed as unsound under Test 4 without such a CP.
- 17.3 CP 20 provides for future initiatives such as park-and-ride schemes, but we have seen no convincing current evidence to substantiate a site to the east of Horsham.
- 17.4 Although the Community Strategy refers to “affordable travel choices”, we have considerable doubts about whether anything meaningful would be achieved by adding the relative term “affordable” before “public transport” in criterion d. of this CP. When related specifically to public transport it begs the question “affordable by whom?” The individual or the public purse? Thus we do not recommend this change.
- 17.5 It is right that transport proposals which are supported by the Council, even if controversial, should be included in a strategy covering 10 years or more. We do not believe that exclusion from a current shorter term implementation programme is sound justification for omitting them from the strategy. Such an approach would lack the necessary transparency about the Council’s position for the long term.
- 17.6 There are criticisms that the approach in CP 20 and its reasoned justification could lead either to beneficial proposals being rejected solely because of lack of alternative transport choices or schemes being permitted purely to finance such choices. PPG13 at ¶ 41 makes it clear that development of PDL in rural areas must take account of various criteria including access considerations. Thus this remains a fundamental criterion and could rightly be a sole determinant. Equally Circular 05/2005 on planning obligations makes it clear that contributions to necessary but absent facilities, such as public transport, are usually reasonable. We find no clear evidence to find this CP unsound.

RECOMMENDATION:

- 17.7** *No changes are required to make the Policy and reasoned justification sound.*

18. Monitoring and Implementation Framework

Chapter 5 and the SA

- 18.1 The success of the new development plan system, involving “plan, monitor and manage”, relies partly on an appropriate monitoring and implementation framework, which ¶ 4.45 of PPS 12 says is crucial to successful delivery. Monitoring should adopt a positive, future orientated approach. In particular, it requires the identification and monitoring of a set of key indicators and targets, such as the delivery of new housing. It also depends on the means of implementation being clearly established (¶ 1.8 of PPS 12) and the identification of possible ways forward for revising and adjusting policies if delivery problems are identified by the Annual Monitoring Report.
- 18.2 On this latter point, the Chapter fails to meet Tests 8 and 9 as it does not state that the CS is expected to be reviewed in 2008 under the LDS scheme (¶ 5.1), mainly in order to take account of the final version of the SEP, but also as an opportunity to correct any significant deviations from the targets. The Chapter also does not say that reserve housing sites will be identified in a separate DPD (see Section 4 of this Report) which would be activated should monitoring reveal that it was necessary. It should be changed accordingly.
- 18.3 Most of this CS Chapter consists of a table which sets out the topic (relating the CS’s policies) together with targets and indicators. It also has to be read with the housing trajectory and the SA objectives, indicators and targets – the latter being distinct from (although related to) the CS (see SA Chapters 7 and 12 and Appendix 4). Targets should allow for direct effects to be measured and should be SMART (Specific; Measurable; Achievable; Realistic; Timed). Not all of the targets fit these requirements as some of them, and some indicators, presently have no means of measurement or are vague.
- 18.4 The early review of the CS will give the Council time to refine its indicators, targets and data collection in line with Government guidance, as set out in the relevant LDF Monitoring Good Practice Guide and its updates. As we have said previously, a pragmatic approach is required - always providing that, as we find in this case, the monitoring mechanisms and flexibility of the CS is not seriously compromised in the short-term pending its review. We also consider that the indicators and targets meet the key test – namely that they will provide sufficient information to assess CS policy implementation and its significant effects, having regard to the Council’s available resources (see ¶ 4.28 of the Good Practice Guide).
- 18.5 The indicator and target for CP 3 (improving development quality) are restrictive and do not give a representative measurement of the CP and its objective, failing Tests 8 and 9. They do not appear in the CP or its reasoned justification. Detailed indicators and targets for this subject can be better dealt with in the DC Policies DPD. They should therefore be deleted.

Other Matters

- 18.6 Chapter 6 (Conclusions and Next Steps) of the CS primarily concerns the submission stage and is now irrelevant (Test 9). Therefore, as the Council suggested, it should be replaced with a more relevant conclusion setting out the place of the CS in the Council’s strategic vision, the future review of the CS, and a contact point for further information.

RECOMMENDATIONS:

- 18.7 *Changes are required to make sound the CS Chapter by referring to the CS review and housing reserve sites, deleting the development quality indicator and target, replacing Chapter 6, and minor consequential changes, all as set out in Annex A: Schedule of Changes.***

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Annex A: Schedule of Changes

The following Schedule sets out the changes that are necessary to make sound and clarify the CS. It includes all our recommendations described earlier in this Report together with changes put forward by the Council to aid clarity and update the document in preparation for adoption. The changes are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text or by specifying the change. In some instances we have made minor alterations to the changes proposed by the Council to achieve greater clarity or correct facts. Where the changes are uncontroversial they have not necessarily been referred to earlier in this Report. Page numbers (especially for monitoring) refer to the submission CS and will have to be altered to reflect the final page numbers in the adopted version of the CS.

Page	Policy / Para	Change	Report Ref
1	1.1	In the case of this District, the Core Strategy ‘Submission’ document has been prepared in parallel with the Site Specific Allocations of Land development plan document, in order to provide as much clarity on the intended way forward as possible.	Intro 10
1	1.2	The Local Development Framework will also includes the Council’s...	Intro 10
1	1.3	The Core Strategy aims to set out...	Intro 10
2	1.4	Delete ¶s and replace with: <u>The policies set out in the Core Strategy do not, for the most part, include cross-reference to other policies. This is because all the policies are inter-related to one another and the document should be read as a whole, including the vision, spatial objectives and spatial strategy.</u>	Intro 10
3	1.9-1.12	Delete ¶s and replace with: 1.8 <u>The response to the consultation on the ‘Preferred Options’ was extensive. A total of some 2,330 comments was received on the four documents published (not solely the Core Strategy), from over 1,350 individuals and organisations. These responses were analysed and considered carefully as part of the process for agreeing the content of the Submission Core Strategy. A number of the issues raised resulted in further studies being undertaken and led to amendments or additions to the strategy. A Statement of Compliance (Response to Representations) Report indicating the response to the objections or issues raised has been prepared, as reflected in the content of the Submission Core Strategy.</u> 1.9 <u>The Council agreed to submit the revised Core Strategy in September 2005. As part of this process, the decision was taken to cover the period to 31st March 2018 in the provisions of the Core Strategy, but with a view to the longer term time horizon in the evolving South East Plan. The Submission Core Strategy was sent to the Secretary of State for independent examination on 4th November 2005. Representations were invited within the specified six week period by 16th December 2005. All the representations received during this period were summarised and the summaries made available on the Council’s website.</u>	Intro 10

Page	Policy / Para	Change	Report Ref
		<p>Examination Stage and Adoption</p> <p>1.10 <u>The Submission Core Strategy has been subject to scrutiny by independent Inspectors, including at Hearing Sessions held in September 2006, in order to test its soundness and to consider the representations made on the basis of whether its approach and proposals were sound. The Inspectors appointed by the Secretary of State to conduct the examination produced a report with recommendations which are binding on the Council in January 2007. As a result, the Council has incorporated the changes required by the Inspectors and has adopted the Core Strategy as the formal development plan document, which is part of the Local Development Framework for the District.</u></p>	
7	2.7 line 13	...(Planning Policy Guidance Statement 3 ‘Housing’, as amended)...	Intro 10
7	2.9	We have already explored these issues through out studies....	Intro 10
11	¶ 1	Consultation on the ‘district’ allocations has been undertaken just prior to the submission of this Core Strategy and advice will be <u>was</u> submitted to the Assembly by <u>in</u> December 2005.	Intro 10
11	¶ 3	SEERA aims to agree to The full final draft of the Plan for <u>was</u> submitted to the Government in March 2006. The Government will then allow This was followed by a further period of consultation, followed by <u>and</u> a public examination of the Plan’s content programmed from November 2006 to March 2007. Once this process is complete it It is expected that the final plan will receive Government approval in 2008.	Intro 10
14	¶ 2	4th sentence:..community <u>infrastructure facilities and services</u> ...	11.1
24	3.11	We see a particular opportunity to be proactive by encouraging the developing role of Brinsbury College as a ‘Centre of Rural Excellence’ with the appropriate expansion of its facilities and links with rural enterprise.	9.10
25	3.13	We believe that there are specific opportunities for development at the Warnham and Wealdon Brick Works site and at the former Shoreham Cement Works site, the latter being part of a broader regeneration initiative in the Sussex Coast Sub-region, which also secures <u>securing the satisfactory restoration of the site with major environmental and landscape improvements compatible with its sensitive location within the AONB, which also is part of a broader regeneration initiative within the Sussex Coast Sub-region.</u>	9.12 & 9.13
34	Under Policy CP 1	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on pages 86-88</u>	Intro 10
35	CP 2	<ul style="list-style-type: none"> a. minimise the emissions of pollutants, including noise, <u>odour</u> and light pollution, b. reduce water consumption, <u>and minimise flooding reducing flood risk to new development and ensuring that flood risk to existing development is not increased;</u> 	3.5
35	Under Policy CP 2	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on pages 89-90</u>	Intro 10
36	¶ 2	Development can increase <u>add to</u> the area of impermeable land which can exacerbate the probability and impact of flooding	3.5

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		<u>then increase the risk and impact of flooding. Surface water must be managed to ensure no increased flood risk on site, or elsewhere.</u>	
39	4.17 lines 4, 6 and 9	...within the District by mid-20045... ...These categories account for some 3,205 <u>3,590</u> homes by 31 st March 20045 (the last date... ...data to for 31 st March 20056 will be published shortly). Deducting this provision from the total requirement to 2018 leaves 7,370 <u>6,985</u> dwellings still to be identified from 1 st April 20045.	4.15
42	4.25	...non-strategic proposals are <u>will be</u> set out in the...	Intro 10
43	4.26 last line	...(which is <u>will be</u> explained in detail in the...	Intro 10
44	4.27	Delete ¶ and replace with: <u>The settlements that are considered appropriate to have a defined built-up area are set out in Policy CP 5. They are identified in two categories as a reflection of their relative position in a 'settlement sustainability hierarchy' by virtue of their potential ability to accommodate differing levels of additional development.</u>	5.16
49	4.39	Delete the last sentence beginning "The principles involved..." and its following bullet points through onto page 50.	6.15
51	4.41	Delete the following part of the last sentence and its following bullet points through onto page 52: development_ in accordance with the following principles: • provision for....	7.14
53	4.43	After the 2 nd sentence add the following: <u>Detailed investigations are continuing into the most appropriate form of the new A24 junction and, whilst it is expected to be contained within the boundary shown, it may be necessary to utilise some additional land. As long as this is purely to accommodate infrastructure works, such small variations shall not be seen as inconsistent with the overall development proposals.</u> In the 3 rd sentence: ... detailed Development Brief Supplementary Planning Document (including a comprehensive Master Plan) to be prepared...	7.11 7.2
53	iv)	Smaller Scale 'Greenfield' Sites	Editing
54	4.45 line 8	...The identified <u>appropriate</u> small scale Greenfield sites (<u>to be</u> set out...	Editing
54	4.46	Delete ¶ and replace with: <u>The intended provision for small scale 'greenfield' allocations to meet identified local needs will be established from consultations and studies undertaken at the local community level and will be set out in the Site Specific Allocations of Land Development Plan Document. The principle is that development will not be appropriate in areas where it is considered that the local infrastructure and facilities would be unable to cope with</u>	5.16 & editing

Page	Policy / Para	Change	Report Ref
		<u>the additional strain that would be placed upon them by new development. Similarly, development will not be appropriate, even in relatively sustainable locations, where it is considered that the environmental impact is too great or that the scale of development would be too extensive in relation to the size of the existing settlement. Parish Plans and Village or Parish Design Statements will be used as a basis for the consideration of needs or opportunities wherever possible. It may also be necessary to commission specific studies to demonstrate that the development will achieve the desired intentions. Some sites may be capable of being brought forward, purely to meet identified affordable housing needs, under the terms of the ‘exceptions’ policy which will be set out in the General Development Control Policies Development Plan Document.</u>	
55	4.46 (cont)	Ashington Billingshurst Henfield Lower Beeding Rudgwick Storrington Sullington. Some sites elsewhere ... Policies document.	5.16 & editing
56	CP 4	This includes: i. 1,810 <u>2,200</u> completions between 2001-04 <u>05</u> ; ii. 1,395 <u>1,390</u> homes already permitted or agreed for release; iii. at least a further 2,740 <u>2,250</u> homes on previously developed land from 200 <u>4</u> 5 – 2018; vi. up to 314 <u>255</u> homes as the small scale gradual growth of smaller towns and villages in the District.”	4.15
56	CP 4	Add after vi: <u>To ensure that the strategic requirements for the District are met, additional land in the most sustainable locations will be identified through the Site Specific Allocations DPD, or a contingency DPD, to be held in reserve and for its release to be managed through Policy CP 9.</u>	4.13 to 4.15
56	Under Policy CP 4	<u><i>Details of the monitoring targets and implementation responsibilities for this policy are set out on pages 90-91</i></u>	Intro 10
56	CP 4 Reasoned Justification	“The proposed delivery...in the form of a Housing trajectory Trajectories. This Trajectory A indicates that...” New ¶s: <u>The District wide Trajectory B includes development West of Crawley and will be used to monitor the progress of housing delivery in this Strategic Location.</u> <u>In order to accommodate any potential shortfall in the forecast supply arising from the sources identified in CP 4 (i) to (vi), additional land may be identified through a separate DPD at one or more Category 1 settlements to be held in reserve with any release managed under the terms of CP 9.</u>	4.7 to 4.9
57	CP 5	Insert Broadbridge Heath below Billingshurst as a Category 1 Settlement	5.8
57	CP 5	Delete Broadbridge Heath as a Category 2 Settlement	5.8
58	CP 5	Category 1 Settlements (towns and villages with a good range of services and facilities as well as some access to public transport – capable of sustaining some expansion, infilling and redevelopment)	Editing

Page	Policy / Para	Change	Report Ref
		<p><u>including a comprehensive Master Plan.</u></p> <p>In the 2nd bullet point: ...will require a new grade-separated junction...</p> <p>In the 4th bullet point: ...providing high quality passenger transport links <u>to the town centre and Horsham rail station</u> from the outset, enabling the opportunity for a new park and ride facility, and ensuring...</p>	<p>7.11</p> <p>7.12 & 7.13</p>
62	CP 7	<p>In the 5th bullet point add at the end: ...Horsham Football Clubs <u>(although a Horsham facility is only a desirable objective, not related to the development).</u></p> <p>Delete the 6th bullet point: • development should ensure...social rented).</p> <p>Delete the 8th bullet point and replace with: • <u>the provision as part of a mixed-use development of appropriate employment and business uses, in order to enable the opportunity of working locally and to reflect the needs of the local economy;</u></p> <p>At the end of the 9th bullet point substitute a semi-colon for the full stop: ...period-;</p> <p>Add a new bullet point: • <u>the provision of improved shopping facilities to meet the additional needs of the expanded communities, subject to the nature and scale of development being justified by the need and there being no materially adverse impact on existing centres; and</u></p> <p>Add a new bullet point: • <u>the outer boundaries to the development formed by the railway line south-west of Horsham, the River Arun and its floodplain south of Broadbridge Heath, and the existing A281 and A264 roads should provide a long term, firm boundary which can be defended against further development.</u></p>	<p>7.15</p> <p>7.14</p> <p>7.10</p> <p>7.16</p> <p>7.5</p>
62	Under Policy CP 7	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on page 92</u>	Intro 10
62	CP 8	<p>Delete Policy below the heading “Small Scale ‘Greenfield’ Sites” and replace with: <u>Limited provision may be made in the Site Specific Allocations of Land Development Plan Document for small scale extensions to the smaller towns and villages to meet identified local needs* and assist in the gradual evolution of these communities by enabling development which meets their needs but does not fundamentally undermine the qualities which make them or their countryside setting unique and special. Beyond this provision, permission will only exceptionally be granted where additional local, social or economic needs arise or where development would result in substantial environmental enhancement compatible with the character of the location.</u></p>	8.2 & 8.3

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		* <u>‘Local needs’ will be assessed on the basis of the contribution to meeting identified local requirements for housing or other development, including affordable housing, the retention or enhancement of community facilities and services, and the extent to which the addition of new development will not reinforce unsustainable patterns.</u>	
62	Under Policy CP 8	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on page 92</u>	Intro 10
63	CP 9 2 nd ¶	However, this is unlikely to be necessary in the short term.....at that stage. <u>Through a separate DPD, additional land may be identified to be held in reserve, and any release to be managed in accordance with specified criteria.</u>	4.13
63	Under Policy CP 9	Add reasoned justification: <u>The primary objective is to secure a sustainable pattern of development. Accordingly, the emphasis will be upon maximising the contribution to the District’s housing needs from previously developed land and secondly, on securing the comprehensive development of the two strategic allocations. However, in order to ensure that sufficient land is identified to meet the annualised housing requirements in the short term and to accommodate any shortfall in the forecast rates of supply, land may be identified under Policy CP4 and held in reserve. Mechanisms will be set out for monitoring and managing the release of land, including identifying the circumstances under which such reserve land would be released.</u>	4.13
63	4.49	Line 5: ...215,000 <u>210,000</u> square metres...	9.3
64	4.49	Provision is made for the expansion and enhancement of Chichester College Brinsbury Campus as a Centre of Rural Excellence. Employment ... and also in the reuse of land at the Warnham and Wealden Brickworks site. Add to the end of the ¶ after the reference to Employment Protection Zones the following: <u>These areas will be identified on the Proposals Map after evaluating a selection of criteria which assess their suitability for continued employment use, based on qualitative and quantitative measures such as location, accessibility, the condition of sites and premises as well as the scope for change and management, and marketing conditions. The suitability of these sites for continued employment use must also take account of how well they are likely to respond to forecast future requirements for employment land or floorspace.</u>	9.10 & 9.12 9.18
65	CP 10	In the first sentence: ...215,000 <u>210,000</u> square metres... In point ii.: ..., including extensions to existing buildings and/or to sites within the boundaries of an existing industrial estate,... Delete and replace point iii. words with: <u>employment development within the West of Crawley Strategic Location, to also meet the additional needs of Crawley/Gatwick, which will be examined in the Joint Area Action Plan for Land West and North West of Crawley;</u> Delete point iv. words and replace with: <u>employment development within the West of Horsham Strategic Allocation, in recognition of the intended mixed-use nature of</u>	9.3 9.15 9.6 & 9.7 9.5

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		<p><u>the development and the potential contribution to the needs of the local (not District) economy, the details of which will be determined through the Supplementary Planning Document Master Plan exercise;</u></p> <p>Delete point v. words and replace with:</p> <p><u>employment development as part of the restoration of the former Shoreham Cement Works site in a manner compatible with its sensitive location within an AONB, and as part of a package potentially including leisure provision which will thereby contribute to the regeneration and economic needs of the Sussex Coast Sub-region, the details of which will be examined in the Site Specific Allocations of Land Development Plan Document;</u></p> <p>Delete point vi. words and replace with:</p> <p><u>employment development as allocated in the Site Specific Allocations of Land Development Plan Document;</u></p>	<p>9.13</p> <p>9.14</p>
65	Under CP 10	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on page 93</u>	Intro 10
66	CP 10 Reasoned justification	New employment provision will also need to take account of the environmental objectives set out in this Core Strategy.	9.16
66	CP 11	<p>Insert a new paragraph before the last sentence and then insert before that sentence:</p> <p><u>Employment Protection Zones will be identified using a qualitative and quantitative assessment of need and the suitability of existing employment sites and premises for continued employment use.</u></p>	9.18
66	Under Policy CP 11	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on page 93</u>	Intro 10
67	4.52	<p>Last sentence:</p> <p>We propose to adopt this approach and also to seek. However, in settlements of less than 3,000 population where a local need is demonstrated for affordable housing, only schemes that provide solely for affordable housing will be permitted unless a local need for additional market housing is also clearly demonstrated. In such circumstances the 40% target will apply with a lower threshold of 5 units (0.16 hectare), in villages of less than 3,000 population as This is a reflection of the limited opportunities for, and desirability of, anything other than small scale development in these locations, <u>consistant with the aim of achieving sustainable development.</u></p>	10.11
67	4.53 line 4	...We will place the emphasis on the developer to deliver the affordable housing; where possible, the obligation will be placed on the developer to provide built affordable units on-site, to be...	Editing
68	4.56 line 15	...sites these are <u>will be</u> set out in the relevant...	Editing
70	CP 12	<p>Last sentence:</p> <p>In settlements with a population of less than 3,000, this permission will only be granted for schemes providing 100% affordable housing unless it is demonstrated that market</p>	10.11

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		<u>housing is required under Policies CP 5 or CP 8. In such cases the target of 40% provision will apply to developments of five dwellings or more (or on sites of 0.16 hectare and above).</u>	
70	Under Policy CP 12	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on pages 92-93</u>	Intro 10
70	Under Policy CP 12	Second sentence onwards: The <u>overall</u> target is to provide 25% of the total as social rented properties with other forms, including shared ownership, <u>shared equity</u> and sub-market rent, comprising the rest of the affordable housing (15%). <u>However, the tenure split on each site will be determined in the light of up-to-date information, particularly on local need and supply.</u> Affordable housing should be provided as built units on-site <u>normally</u> in conjunction with Registered Social Landlords; ...	10.9
71	CP 13	Add a * at the end of the “Infrastructure” title and underneath the CP insert: <u>*See Glossary for definition</u> 2nd sentence: “...development <u>or the relevant phase of the development,</u> ... At the end of the last sentence: <u>...,or the relevant phase of the development.</u> Add the following end ¶: <u>Proposals by service providers for the delivery of physical infrastructure to meet the needs generated by new development and by existing communities will be permitted, subject to other relevant policies.</u>	11.1 11.4 11.4 11.3
71	Under Policy CP 13	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on pages 93-94</u>	Intro 10
71	CP 13 Reasoned justification	2 nd sentence: <u>Developers, working in conjunction with the Council,</u> ... Last sentence: ...relevant parties on the total funding and ... and off-site improvements, <u>or such improvements have been secured by other means such as a condition. The Council’s approach to planning obligations and this topic will be set out in more detail in an SPD.</u>	11.4 11.3
72	CP 14	Delete and replace with: <u>Protection and Enhancement of Community Facilities and Services*</u> <u>New or improved community facilities or services will be encouraged in order to enrich the overall quality of life within the District and, particularly, where they meet the identified needs of local communities. These facilities or services should preferably be within defined built-up areas but exceptionally may be located outside such areas where this is the only practicable option and where a suitable site well-related to an existing settlement exists.</u> <u>Development proposals that would result in the loss of sites and</u>	11.1, 11.5 & 11.6

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		<p><u>premises currently or last used for the provision of community facilities or services, leisure or cultural activities for the community will be resisted.</u></p> <p><u>The loss of open space, sport and recreation facilities is dealt with in national planning policies (PPG17). For other circumstances, as a minimum it will be necessary to demonstrate that continued use as a community facility or service is no longer feasible having regard to appropriate marketing, the demand for the use of the site or premises, its usability, and the identification of a potential future occupier. Where it cannot be shown by these or other means that the community facility or service is surplus to requirements, such a loss may be considered acceptable provided that:</u></p> <p><u>a. an alternative facility of equivalent or better quality and scale to meet community needs is available, or will be provided at an equally accessible location within the vicinity; or</u></p> <p><u>b. a significant enhancement to the nature and quality of an existing facility will result from the redevelopment for alternative uses of an appropriate proportion of the site.</u></p> <p><u>*See Glossary for definition</u></p> <p><u>Details of the monitoring targets and implementation responsibilities for this policy are set out on page 95</u></p>	Intro 10
72	CP 14 Reasoned Justification	<p>Delete and replace with:</p> <p><u>New or improved services and facilities for communities in the District, including recreational provision (see the definition of community facilities and services in the Glossary), will be required and they should be planned for and suitable land provided for them in appropriate and accessible locations.</u></p> <p><u>It is equally important to protect community facilities and services that play an important role in the social infrastructure of the area. Prospective applicants for any proposals that involve alternative uses of sites and premises are advised to consider the qualitative, quantitative and accessibility requirements, including the possibility of a financial test, at the earliest opportunity.</u></p>	11.1, 11.5 & 11.6
73	CP 15	<p>Divide ¶ 1 into two separate paragraphs:</p> <p>Sustainable rural economic development within the District will be encouraged in order to deliver economic, social and environmental benefits for local communities.</p> <p>Appropriate development within the smaller towns and villages* will be considered positively where it can be shown to support their role in acting as a focus for meeting rural community needs.</p> <p>In the countryside, development which.....</p> <p>a. contribute to.....the countryside; and <u>either</u>.... new or replacement buildings are involved.</p> <p>Any development in accordance with this strategy should not harm the rural character of the area by virtue of the nature and level of activity involved and the type and amount of traffic generated (or by other effects such as noise and pollution).</p> <p><u>* The smaller towns and villages in the District are all those</u></p>	12.2

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		<u>listed in Categories 1 & 2 in Policy CP 5, with the exception of Horsham town.</u>	
73	Under Policy CP 15	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on page 95</u>	Intro 10
74	CP 16	i. ii. iii. iv. v. <u>a. b. c. d. e. . . . and travellers_ (see Policy CP 17 below).</u>	14.5
74	Under Policy CP 16	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on page 95</u>	Intro 10
75	CP 17	Delete CP 17 and its following reasoned justification entirely, and renumber the following CPs accordingly.	14.5
78	CP 18	Delete criterion b. words and replace with: <u>limiting proposals within existing town centres to under 2,500 square metres gross floorspace unless the relevant criteria in PPS6 are met;</u> Delete criterion c. words and replace with: <u>restricting retail development, except extensions under 200 square metres gross floorspace, outside the defined centres unless the relevant criteria in PPS6 are met;</u> Delete criterion d., and renumber criteria e. and f. accordingly.	15.2 15.3 15.4
78	Under Policy CP 18	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on pages 95-96</u>	Intro 10
79	4.63	Delete and replace with: <u>Within this overall philosophy, the approach towards the encouragement of tourism will vary across the District according to the characteristics of the different parts of the area. The emphasis is on focusing appropriate facilities in the towns and larger villages as far as possible. Within Horsham town in particular, there is scope to enhance the attraction provided, through the encouragement of additional hotel accommodation, including in recognition of the identification in the Horsham District Tourism Strategy and Action Plan for 2005-2015 of the potential benefit of a new ‘business’ hotel. At the former Shoreham Cement Works there may be potential for tourism or major leisure uses in conjunction with employment provision, as part of the restoration package for the site identified in Policy CP 10 and set out in more detail in the Site Specific Allocations of Land DPD. In the rural areas we will support initiatives which seek to develop the tourism opportunities associated with rural diversification, including recreation-based farm diversification, provided that they are of a scale and type appropriate to their location. It will, however, need to be clear that within the Areas of Outstanding Natural Beauty any tourism development will also need to conserve and enhance their natural beauty and so may need more critical assessment. In all cases where tourism development is involved consideration will need to be given to the impact on existing centres, the effect on the environmental or historic character of the area, and the means to increase access by sustainable transport modes.</u>	16.3, 16.4 & 16.6
80	CP 19	Add a * to the end of the CP title and underneath the CP insert:	16.1

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		<p><u>*See Glossary for definition</u></p> <p>line 2: ...rural diversification*...</p> <p>line 6: ..., day visitors, <u>business visitors</u>,...</p> <p>Delete criterion b. words and replace with:</p> <p><u>focuses major new hotel accommodation in Horsham town centre, particularly with a view to improving the range and type of hotel accommodation within it; and focuses other new build tourist accommodation in, or adjacent to, existing towns and villages;</u></p> <p>Delete criterion e. words and replace with:</p> <p><u>do not result in the loss of a cultural resource; and</u></p> <p>Delete criterion f. words and replace with:</p> <p><u>support the restoration of the Shoreham Cement Works site as part of the comprehensive package involving employment and leisure uses, aimed at securing major environmental and landscape improvements compatible with its sensitive location within an AONB.</u></p>	<p>16.2</p> <p>16.1</p> <p>16.3 & 16.4</p> <p>16.5</p> <p>16.5 & 16.6</p>
80	Under Policy CP 19	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on page 96</u>	Intro 10
82/83	Under Policy CP 20	<u>Details of the monitoring targets and implementation responsibilities for this policy are set out on page 96</u>	Intro 10
85	Sub-heading	MONITORING AND IMPLEMENTATION FRAMEWORK	Editing
85	5.1	<p>Delete all from the 5th sentence onwards: The extent to which... and insert instead:</p> <p><u>Should annual monitoring of the indicators reveal any significant failure(s) to meet targets, the Council will take action to rectify the situation as soon as possible. In particular, a separate DPD will identify additional housing land which will be held in reserve, and it will also set out mechanisms for monitoring and managing the release of such land. In addition, the Council will undertake a review of the Core Strategy where steps can be taken, if necessary, to correct matters. The review is expected to commence in 2008 (as set out in the Local Development Scheme), and will take account of the then published South East Plan.</u></p>	18.2
85	5.2	<p>In the 2nd sentence:</p> <p>...derived from the twenty <u>nineteen</u> core policies...</p>	Editing
85	5.3	...by a formal Sustainability Appraisal / <u>Strategic Environment Assessment</u> report...	Editing
88	Line 2	Initially period of monitoring	Editing
89	Line 2	Topic Indicator/Proposed Action Targets & Dates Responsible Agency Reference/Comments	Editing
89	Line 3	District Council/ Environment Agency- Private Sector	Editing
89	Line 5	Water quality not <u>attributable</u> to development alone...	Editing

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90	Line 10	Delete entire row starting: Improving the Quality of New Development...	18.5
91	Line 5	2,740 <u>2,250</u> homes from 2004 <u>5</u> -2018	4.15
92	Line 2	Topic Indicator/Proposed Action Targets & Dates Responsible Agency Reference/Comments	Editing
92	Line 5	Site Specific a Allocations of Land DPD.	Editing
93	Line 1	215,000 <u>210,000</u> sq m...	9.3
93	Line 8	Delete entire row starting: Provision of range of types...	9.20
95	Line 2	Topic Indicator/Proposed Action Targets & Dates Responsible Agency Reference/Comments	Editing
95	3 rd row	Delete entire row starting: Inclusive Communities/Gypsy & Travellers...	14.5
97/98	Chapter 6	Delete the ¶s in Chapter 6 and replace with: 6.1 <u>This document is a key component within the process of preparing the full ‘portfolio’ of documents which will comprise the Local Development Framework. This Core Strategy development plan document represents the Council’s agreed vision, spatial objectives, policies and monitoring and implementation framework for the District. All other development plan documents must be in conformity with the Core Strategy. More detailed provisions for particular sites or for controlling development within the District are set out in other development plan or supplementary planning documents, in accordance with the Council’s agreed Local Development Scheme. The core policies in this document provide the strategic framework necessary to deliver the intended spatial strategy.</u> 6.2 <u>Having defined the vision as an extension of that agreed by the Horsham District Community Partnership, specified spatial objectives, and articulated these through the spatial strategy and core policies, we have reflected the discussions and comments made by the community, stakeholders and other interests during the formative stages of this document, as far as possible.</u> 6.3 <u>We will continue to discuss the implementation of the provisions made in the Core Strategy and to consider any issues arising from the indicated approach with relevant parties, as appropriate. We will feed the outcome of any such discussions into the process for reviewing formally the Core Strategy, which we expect to commence in 2008, in parallel with the final published version of the South East Plan. The programme for this review is set out in the Council’s Local Development Scheme.</u> 6.4 <u>In the meantime, if any further information is required about this Core Strategy or the Local Development Framework process as a whole, you should contact the Strategic and Community Planning Department at this Council on (01403) 215398 or e-mail: strategic.planning@horsham.gov.uk</u>	18.6
99	Heading Line 3	TRAJECTORY TRAJECTORIES Annex: Horsham District Housing Trajectory This trajectory has Trajectories have...within this Submitted Core Strategy...	4.8 & 4.9

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	¶ 2 ¶ 3 Last line	...the attached tables shows completion... ...the completions for 1999 <u>2000</u> – 2001 are included... Add new penultimate sentence: Trajectory B included projected completions for the West of Crawley Strategic Development. This Trajectory <u>A</u> for Horsham District... ...included in the Trajectory <u>A</u> .	
99	Table	Estimated Losses 414 <u>409</u> Total requirement (excluding Crawley) 7,661 <u>7,666</u> (Net) The trajectory shows 7,846 <u>7,686</u> anticipated net completions...	Update
100	1 st line 2 nd line	...accompanying tables has... These graphs Trajectory <u>A</u> helps to demonstrate...	4.8 & 4.9
101-3	Tables and graphs	Replace tables and graphs with Housing Trajectory A and B from HDC/Matter2 – CP4 and CP9: Hearing Session Agenda Point 4 Response by HDC, September 2006 (A); and HDC/Matter 2 – CP4 and CP9: Response Statement by HDC August 2006 (B).	4.8 & 4.9
106	Glossary	Deleted “Community Infrastructure” and its definition.	11.1
106	Glossary	Community Facilities and Service <u>Facilities or services for the community, including open space, sport and recreational facilities, community halls or buildings, doctor’s surgeries, libraries, pubs, churches, and children’s play areas.</u>	11.1
110	Glossary	Under heading Infrastructure replace text with: <u>A collective term for services such as roads, electricity, sewerage, water, children’s services, health facilities and recycling and refuse facilities.</u>	11.1
113	Glossary	Rural Diversification <u>A term relating to improving and sustaining the quality, range and occupational mix of employment in rural areas in order to provide wide and varied work opportunities for rural people, including those formerly or currently employed in agriculture and related sectors.</u>	16.1
117	Glossary	Tourism and Cultural Facilities <u>Uses or activities which relate to the arts, culture or tourism including hotels, guest and bed & breakfast accommodation, theatres and concert halls, museums, galleries and conference facilities.</u>	16.1
Key Diagram		Move symbol for Horsham Crawley Strategic Gap to exclude the West of Crawley area of study.	3.4
Key Diagram		Change Broadbridge Heath to a Category 1 settlement.	5.8
Key Diagram		Delete “Warnham Brickworks” and “Brinsbury College” as “Employment Locations”.	9.10 & 9.12