

## **Appendix 1: Summary of Comments Received on ‘Leading Change in Partnership to 2026 and Beyond’ Core Strategy Review Consultation**

### **Whole Document (106 Comments)**

In total 106 comments were received against the whole document and as might be expected, these were a mixture of support, objections and observations. This summary will focus on comments relating to the whole Core Strategy document rather than those relating to specific strategic sites or spatial options as these will be covered elsewhere.

There were 7 comments made in support of the document, generally supporting the overall principles and objectives of the Core Strategy, particularly in relation to prioritising brownfield land for development, small-scale development in smaller settlements and villages, local character being preserved, and the emphasis on more sustainable development. Support was also received for building on the provisions of the existing Core Strategy rather than reworking it.

63 General observations on the Core Strategy were received including suggestions that;

- An objective for preserving biodiversity should be included;
- Green Infrastructure should be a main principle of development;
- There should be more focus on what supporting infrastructure will actually be required as it is too subjective at present;
- Some of the Strategic Sites cannot be described as urban extensions due to their scale and they will consume large areas of valued countryside;
- Because of the ever increasing demand for housing in Horsham District, it is not appropriate to develop more and more urban extensions. A new town or village (Spatial Strategy 3) is the most sensible option;
- The figures in the Core Strategy for housing targets cover a different time period to those in the South East Plan and many have found it difficult to understand where Horsham District is in terms of meeting targets, and what further numbers are required;
- In addition to the above point, the most recent AMR was in early 2007 adding to this difficulty;
- There should be a reference to the South Downs National Park within the document. Having such a valuable natural environment in the District requires at least some small mention;
- The Core Strategy should prioritise a site for a new hospital with a 24hour emergency department as it is a major need of both current and future populations in the District; and
- Whilst it is appreciated that the document needs to be flexible, it was suggested the document would be improved if definitions of the principles and policies were provided in order to provide more certainty to readers over what is intended.

There were 37 general objections made in relation to the whole document; specifically it was felt that;

- The document was too complex;
- The positives and negatives for each spatial and site option were not adequately covered;
- There should have been some indication to the strategies and sites that are more favoured;
- There should have been a longer consultation period due to the considerable importance of the document;
- The Core Strategy Review should have been delayed until a time of more stable economic and political conditions, to enable Horsham District Council (HDC) and the public have more certainty over the content;
- The document advocates an unsustainable pattern of development, particularly by indicating that category 2 settlements are suitable places for significant quantities of housing;
- The document is based on unfounded housing targets by the South East Plan (SEP) and no development on this scale could possibly be sustainable; and
- Many of the Strategic Sites appear to contradict previous aims, objectives and policies of HDC, notably sites in 'strategic gaps' and the large scale greenfield land proposed for development.

## **Chapter 1: Introduction and Background (0 comments)**

### **The Adopted Core Strategy (2 Comments)**

Two comments were received on the sub-heading 'The Adopted Core Strategy' and both suggested improvements. The first comment suggested that more flexibility at every level of the Core Strategy would allow a better response to future challenges, while the other recommended that housing targets needed to be more up-to-date including; those already completed and; those due to be completed such as the West of Bewbush and West of Horsham developments.

### **Issue 1: Approach to Core Strategy Review (11 Comments)**

**Is this approach appropriate for the Core Strategy Review bearing in mind what has been established to date but also what has changed?**

This issue received 11 comments, the majority of which were objections over the timing of the Core Strategy Review. These objections generally stated that the likelihood of political change and its impact on the planning system (namely the scrapping of regional planning by the Conservatives) and the tough economic climate in which the document was produced meant it would be more relevant and applicable to produce the document after the general elections in 2010. It was suggested that after this time, there was likely to be an improvement in the economic climate and greater political certainty. Postponing the CS review by just under 12 months was therefore seen as the more sensible option.

### **The South East Plan (9 Comments)**

Similar to comments made on Issue 1, comments received on the South East Plan raised an objection to the fact that Regional planning may be scrapped in 6 months time if the Conservatives come into power following the next general election. This would then invalidate the SEP. There were also a number of objections raised in relation to the SEP's housing target for the Horsham District, with many believing it to be excessive and questioning the need for housing development on the scale the SEP requires. Furthermore, a few comments related to the Annual Monitoring Reports (AMR) stating that one has not been published since March 2007 leaving the public guessing as to how many houses have actually already been completed.

## **The Purpose of this Consultation (1 Comment)**

One observational comment was made stating that HDC should be flexible with its strategies for housing development and that if the Conservatives are elected, and regional plans are abolished, the District should considerably lower its housing targets.

## **Chapter 2: 'A Vision for Horsham District to 2026 and beyond' (7 Comments)**

A total of 7 comments were received on the chapter as a whole, with a further 5 commenting on the section on the 'Visioning Horsham' consultation and 1 comment each on the sections relating to the 'All Our Futures' consultation; the Horsham District Sustainable Community Strategy; and the 4 Goals to achieve the desired community. 9 further comments addressed the issue raised in the highlighted Issue 2 set out at the end of the chapter.

Of the total comments received on the general content of the chapter, the majority were a mixture of observations and support, although several comments were objections to elements of the vision or the Sustainable Community Strategy (SCS). Generally there was some support for taking a proactive stance towards economic development as part of the vision, provided the requirements of current and potential future businesses are met as a priority. Using the knowledge and expertise of local business leaders was also seen as crucial in setting the vision. One representation queried the opportunities for economic growth given the limited transport facilities, except close to the Gatwick area, whilst another agreed with the identification of transport as a key concern in the SCS. It was also suggested that excessive development would substantially damage the quality of life enjoyed by existing residents, contrary to the expressed vision statement.

The objections centred around the basis on which the employment and related housing needs had been estimated and the trigger for growth and jobs, given that it was considered by some parties that the area is more likely to become even more of a commuter belt. In this context it was suggested that, rather than a further increase in housing, it would be preferable to build up the infrastructure first, particularly transport and hospital provision. One respondent challenged the goals and objectives established by the SCS and did not feel that they adequately provided the basis for determining the spatial planning objectives of the Core Strategy Review. It was suggested that they did not take account of the pressure from the increased population on services and infrastructure and that they were too generalised, omitted essential detail, and did not adequately reflect the principles of Government planning policies, particularly on biodiversity, or the South East Plan. However, a counter view was expressed by another respondent who considered that the vision, goals and aims of the SCS appeared sound and more than adequate, requiring no further elaboration at present. A further representation considered that the needs of faith groups and the voluntary (or third) sector was not sufficiently recognised and must be incorporated into the stated goals to achieve the 'community' desired by the SCS and later Core Strategy Review.

A different objection focussed on Horsham town centre considering that the strategy at present would not help and that a fundamental change is required, based on residential development as a means to stimulate regeneration and the local economy.

## Issue 2: Sustainable Community Strategy (9 Comments)

**Do you agree that the vision and goals/objectives established by the Sustainable Community Strategy adequately provide the basis for determining the spatial planning objectives of the Core Strategy Review? How could they be elaborated further?**

Of the 9 comments in response to this issue, 7 were observations and two objections. The comments made were quite wide-ranging but focussed on the need to remain flexible enough in order to represent properly the needs of all groups in society; the need to widen accessibility which is vital to small and medium businesses in the District; the need to carry the aim of meeting the needs of business growth and job creation strongly through the policy framework; and the need to put greater emphasis on the protection and enhancement of the natural and built environment. In this latter context it was suggested that the current housing requirements are excessive and, in going way beyond what is required, will do substantial harm to the environment and quality of life. A similar view was that economic development does not always equate to an improvement in the quality of life, and there may be conflicts between the desire for economic development and the aim of protecting and improving the natural and built environments. It was also suggested that there should be added a stated goal/aim to reduce and foster the rural economy within the District which is also of prime importance to maximise and safeguard food production for an increasing population.

A further view was that the goals and aims set out are laudable but that outcomes are not supported by recent experience; there is therefore a need to restore credibility by understanding each community and unlocking the needs where they are not immediately obvious. It was suggested that sustainable development should consequently deal with economic stability, environmental impact and, most importantly, the need for education and behaviour/social change. A different representation viewed sustainable development and economic diversification as being related to high quality housing development which would help attract and retain existing and future economically active residents and thereby help reduce the demand to travel by road.

One of the objections related to the issue of what makes and enhances a community, particularly in terms of a shared sense of place and identity. It was considered that communities have a natural limit on their size beyond which they cease to provide residents and others with that sense of belonging that is necessary to deliver the Strategy's goals. In many cases the options considered seemed to fundamentally alter existing community relationships. The second objection considered that policies should specifically tailor house types and needs to that of the local community or settlement, rather than be more broadly based.

### **Chapter 3: Planning for Future Change in Horsham District (47 Comments)**

Of the 47 comments received, three comments were supportive, 12 were observations and 32 objections. Most comments largely relate to the Strategic Sites and Spatial Options proposed.

In general, the supportive comments related to the following issues;

- Support for housing need analysis;
- Support for the Strategic Spatial Option 4 because it will allow for the most appropriate choice of development for the district and is the most sensible option; and
- Support for the Strategic Spatial Option 2, means that the smaller settlements retain their green spaces and character and locates development in the larger settlements that can better cope with it due to better infrastructure.

General Observations included:

- Would Strategic Sites 8 and 9 involve housing development on the Toat Site? Whilst Horsham District Council has discussed reasons for not developing this site, the proposed Strategic Sites 8 and 9 provide an opportunity to reconsider this site;
- Development in 'strategic gaps' between Horsham and Crawley will lead to the eventual coalescence of the two towns and should not be permitted;
- Strategic Spatial Option 3 would be cheaper and less damaging than the other spatial options. A new town or village would eradicate the problem of ruining the character of existing settlements, and would be a more sustainable option as all the necessary infrastructure can be planned for adequately;
- The housing targets set for the district are so large and almost incomprehensible, it would be more beneficial for a proportionate strategy for achieving targets, the larger settlements providing the larger number of housing;
- The Core Strategy vision is of creating sustainable places to live and work, there should however be more consideration of leisure facilities so that sustainable places to live, work and play are created.

The comments which objected to this section of the document raised the following objections relating specifically to the various site options;

- Strategic Site option two includes an AONB and will undermine the policy of a 'strategic gap' between Horsham and Crawley;
- Strategic Site options 3 and 4 involve the loss of valued greenfield land and would take development further toward Crawley from Horsham;
- Strategic Site option 5 proposes the destruction of highly valued open space including a wealth of wildlife and an area for informal recreation. It is location where countryside can be enjoyed within an otherwise urban settlement;
- Strategic Site option 6 would significantly alter the character of Southwater by destroying valued countryside. The A24 can not support the proposed development and the lack of a secondary school in Southwater is not currently a major issue and should not justify development here;
- Strategic Site option 7 would add more problems to Billingshurst, including straining the infrastructure and ruining the character of the village. The capacity of the Weald School is not sufficient to support an increased population;
- Strategic Site option 8 is one of many greenfield and conservation areas that should not be destroyed. There is also a lack of infrastructure to support large housing development, particularly in terms of the road networks and development would ruin the character of West Chiltington; and
- Strategic Site option 9 lacks the necessary transport infrastructure for development.

### Issue 3: Spatial Objectives (20 Comments)

Do these spatial objectives adequately articulate the intended approach derived from the vision? Do they provide an appropriate basis for examining alternative development and policy options?

In total, 20 comments were received in relation to this issue, the majority of which were observations and recommendations on how to improve the key objectives listed under paragraph 3.7. 9 objections were also received and these comments are summarised below. No comments were made in support of the issue, however a number of the 'observational' comments were supportive of the overall vision and objectives.

Of the 9 objections received, four were against the inclusion of SEP housing targets as it was felt that they were too high and may be abolished following the next election if the Conservatives came into power. There was also a request that HDC challenge the existing allocation. A further objection stated that not enough evidence had been provided to explain why the stated spatial objectives has been chosen and that further information was needed to demonstrate each options ability to deliver the necessary infrastructure. There was also a suggestion that HDC had not complied with the principles of South East Plan policies: Policy C4: Landscape and Countryside Management; Policy CC8, Policy NRM4: Sustainable Flood Risk Management; Policy NRM5: Conservation and Improvement of Biodiversity, Policy NRM7: Woodlands, Policy H6: Making Better Use of the Existing Stock, Policy T2: Mobility Management, Policy T4: Parking, Policy T5: Travel Plans and Advice.

The remaining objections were objections to further development at Billingshurst. More detailed comments on this issue are included later in this summary.

Where observational comments were received, they were made specifically in relation to the key objectives listed under paragraph 3.7. These comments are summarised below;

- Bullet 1: *Deliver planned growth in housing* – No Comments;
- Bullet 2: *Ensure development is based on sustainable development principles* – No Comments;
- Bullet 3: *Meet the needs of communities, particularly for affordable housing* – Request that wording of this objective be changed to 'meet needs of all communities' to best represent all communities and groups often excluded by plan making process;
- Bullet 4: *Foster significant economic development and employment growth*: Two comments supporting this, one stating that an alternative approach to settlement policies is vital in facilitating sustainable development in small towns and villages. There was also one comment against this objective stating HDC should aim to create a highly skilled, flexible workforce to sustain economic development, rather than grow. The rationale behind this was that too fast a rate of economic growth would simply inflate the demand for more housing and that what is needed is more gradual, sustained and largely organic growth in economic activity and prosperity;
- Bullet 5: *Encourage rural villages to become more sustainable* – This objective was queried in that the respondent was unclear whether it referred to the need of residents and businesses to do more themselves to embrace sustainability (i.e we should all cycle more, increase recycling efforts) or if it was an indication of what development should aim to achieve in these locations;
- Bullet 6: *Achieve high quality design*: One comment received stating this has so far proved to be unattainable because it is not grounded on any accepted understanding of what it means, or how to measure progress. The respondent called for a commitment to the positive encouragement of good, bold, innovative design underpinned by the availability of top class independent advice;
- Bullet 7: *Ensure development is accessible*: 1 supporting comment received;

- Bullet 8: *Provide delivery mechanism for infrastructure*: Request that objective is extended to include railways, water, drainage, hospitals health centres and medical facilities;
- Bullet 9: *Ensure new development minimises carbon emissions*; No Comments
- Bullet 10: *provide guidance on where long term future growth should occur*. Objective considered essential.

It was also suggested that the following key objectives be added:

- *protection and enhancement of our natural environment, landscape and townscape and biodiversity*; (2 comments in support of this)
- *protect and foster the rural economy in the district*;
- *protect places of worship, independent education facilities and burial ground*; and
- *Support the redevelopment of previously developed land as a priority*.

#### **Issue 4: Spatial Options (2 Comments)**

**Do these summary options reflect the possible future strategic spatial options for the District, or are there other possible alternatives which should be examined?**

***N.B 'Do Nothing' has not been included as a reasonable option because it would not accord with national and regional planning policies***

A total of 21 comments were submitted in relation to Issue 4, 10 making observations, 6 objections and 5 comments in support. The response to the issue raised is, therefore, mixed; of those who responded directly to the question posed, 9 generally agreed that the summary options reflected the possible future strategic spatial options (albeit with caveats) and only two took the view that they did not. The qualification to the acceptance of the summary options was essentially a matter either of the description of the option itself, such as the need in Strategic Spatial Option 3 to be considering a new market town which would be planned from the outset to reach a final size considerably larger size than 10,000 or within Option 4 to state clearly that one of options 1 - 3 could be employed early in the plan period and then an alternative later in the plan period, or the view that the information in the consultation was insufficient fully to assess the options at this stage. It was also suggested that the four options were not fully reflected in the Locational/Site Options, particularly as none were identified in the south and south east of the District. Those who disagreed with the question posed did so largely on the basis that the Council should challenge the number of houses imposed by the South East Plan, which could itself be affected by a change of Government and the revision of existing national and regional planning policies, or that a 'Do Nothing' option should be included because the national and regional planning policies are wrong.

There was a further view, whether the question posed was generally accepted or not, that one Strategic Spatial Option should not be considered to be a 'one size fits all' solution. The Gatwick Sub-Region and the 'Rest of the District' area were considered to be markedly different in terms of character, infrastructure need and settlement nature and distribution and should resultantly be considered as separate entities when selecting the most appropriate Strategic Spatial Option to be applied to each. The comments also expressed some views about the nature of the options identified in this initial summary, with particularly polarised views on whether Strategic Spatial Option 3 was appropriate or not. There was also some concern about considering potential development requirements beyond 2026 because it was considered that additional development beyond 2026 would be very unlikely to be sustainable given the specific characteristics of the District and the environmental constraints on development already acknowledged.

## **Issue 5: Strategic Spatial Option 1 – Spread Development throughout the District (16 Comments)**

**Does this option express appropriately the realistic approach towards future development within the District without major concentrations in particular locations?**

A total of 16 comments were submitted in relation to Issue 5, comprising 7 making observations, 3 objections and 6 comments in support. The comments were largely framed in terms of support, sometimes qualified, or opposition to the concept of spreading development throughout the District, rather than as a direct answer to the question posed in the Issue itself. The main objection was that the opportunities under this option, which it was considered were greatly exaggerated, and constraints, which it was considered did not adequately reflect their seriousness or impact, meant that it was not a realistic approach. The option was not supported by developers making comments on the basis that it is unsustainable and unlikely to deliver major community benefits or infrastructure and that it potentially conflicts with the spatial strategy encouraged by the South East Plan.

The support for the option focussed on the principle that it was the most appropriate approach for the 'Rest of the District', with recognition that the two sub-areas within the District are different and a single option may not be appropriate for both. In the Rest of the District, it was considered that spreading the development would encourage smaller towns and villages to develop and evolve. There was also a view that it would be better to spread out the development rather than overload one location but that, whatever the option, appropriate facilities should come first. There was some support for a hybrid of Options 1 and 2 as it would allow flexibility to target development in the most sustainable locations or where it was needed to meet local needs and can be accommodated without unacceptable detriment. One qualification of support for the Option was based on it not being at the expense of many villages and settlements losing their uniqueness and character or ignoring established planning policies.

## **Issue 6: Strategic Spatial Option 2 – Focus Development on the Main/Most Sustainable Existing Settlements (12 Comments)**

**Does this option express appropriately the realistic approach towards future development within the District involving major concentrations in particular locations on the edge of towns or villages?**

A total of 12 comments were submitted in relation to Issue 6, comprising 4 objections and 8 comments in support. The main objection was that the opportunities under this option do not support further development in key locations adjoining Horsham town because such development could not have sufficient regard to the landscape impact and infrastructure aspects and would not offer any potential for a comprehensive approach to the future planning of the town. In addition, it was considered that the constraints should reflect the fact that this option is undeliverable without arousing significant public opposition. A further objection suggested that it must be combined with a more limited dispersal of development in the more sustainable Category 1 settlements to be genuinely sustainable. It was also suggested that the option would lead to large, soulless conurbations without any sense of village or community.

The support for the option focussed on it being the most appropriate in terms of meeting the South East Plan requirements as well as the benefits of concentrating development on key locations close to the main towns in the Gatwick Sub-Region in order to reinforce their role in providing key services and facilities with the potential to upgrade these to meet identified need. It was considered, however, that there was no clear evidence as to why some locations in the rest of the District had been selected under this approach. There was some support for prioritising development within or adjacent to Category 1 settlements ahead of a new settlement but also ensuring that each development must enhance the community and built environment. It was also

pointed out that a development strategy should be mindful of the need to achieve the appropriate level of redevelopment of previously developed land.

### **Issue 7: Strategic Spatial Option 3 – Concentrate Development in Each Sub-Region within a New Settlement (19 Comments)**

**Does this option express appropriately the realistic approach towards future development within the District involving new settlements in locations within each of the component parts of the District?**

A total of 19 comments were submitted in relation to Issue 7, comprising 5 making observations, 10 objections and 4 comments in support. The main objections were that the option contradicts most of the objectives set out in the Core Strategy Review, particularly in the part of the District outside the Gatwick Sub-Region, given the environmental damage involved with little tangible benefits; the lack of any demonstration of the ability to fund the necessary infrastructure at the appropriate stage; the absence of any evidence that it would offer sustainable models of living and working; and problems of social integration/cohesion. It was considered by some that the option is one 'for disappointment and failure', particularly as the District does not have the infrastructure to support large scale development. It was also considered that the option would not deliver the required housing numbers over the plan period and the significant investment required in the early stages could lead to reduced affordable housing provision in those early stages. In addition, there was some overlap between the concept of new settlements in the District and the specific locational proposal at Adversane/North Heath, which generated objection in detail and in principle.

In terms of support, there was backing for development being concentrated on a single large new settlement, particularly if such a settlement was to be located in the A23 corridor in an area of low agricultural value. It was considered by some to be the only option which expresses a realistic and deliverable approach towards future development in the period 2018-2026 and beyond and that the constraints to such an approach had been over stressed. It was suggested that further exploration of the option would be a significant challenge on resources and, if favoured, should evolve through the continued work in relation to an integrated strategy for the Gatwick Diamond/Sub-region.

### **Issue 8: Strategic Spatial Option 4 – A combination of any or all of the above options (Hybrid Option) (6 Comments)**

**Does this option express appropriately the realistic approach towards future development within the District involving a mix of forms of development in both locational and timing of delivery terms?**

A total of 6 comments were submitted in relation to Issue 8, comprising 3 objections and 3 comments in support. The objections centred on the option being the 'worst of all worlds' and a 'recipe for fudge and expediency' which would amount to abandoning any pretence of a truly strategic approach. It was considered that it would inevitably lead to one of the other options coming to the fore by default and would be less likely to address the infrastructure requirements associated with new development. It was suggested that the option could actually hamper the ability to meet the housing land supply requirements in the longer term.

The support was largely based on previous views about the combination of earlier options, principally Options 1 and 2, and on the basis that a review should be undertaken to ascertain what development could be supported over the District without affecting existing infrastructure.

### **Strategic Site Option 1: West of Ifield Summary of Comments (27 Comments)**

In total 27 comments were received in relation to Site Option 1. The majority of comments were objections and only one comment supported the proposal.

The majority of the comments referred to the lack of existing infrastructure in the area to sustain a large development. The road network around Ifield was considered a main obstacle as any further development would exacerbate the already problematic congestion issues.

A large number of comments stated that part of the option being considered is within the Crawley Borough administrative boundary, particularly Ifield Brook Meadows that comments identify as being part of the Crawley Millennium Greenway that is widely used by local people for recreational purposes and is rich in wildlife. Therefore it is considered that development at this site would not count towards Horsham's housing numbers, would have a detrimental impact on a well used and enjoyed area, and should be part of Crawley's long term development strategy rather than Horsham's.

The potential allocation area was considered by many comments as an area of ecological and environmental significance that has had problems with flooding over recent years, particularly in the north eastern section. There were also concerns that further development in the area would have an adverse impact on the character of Ifield as well as potentially the character of Crawley and Horsham, as the strategic gap between the two settlements would be reduced further.

Other comments were surprised that the site is being considered so soon after the decision to allocate West of Bewbush. They argue that the site has already been considered and rejected by both Councils and that it is unfair that Crawley residents should bear the burden of Horsham District Council's housing requirements.

The one supporting comment considered the West of Ifield offered the best option for delivering strategic growth in Horsham District for the long term. It argued that the site would be suitable and available to form a sustainable new neighbourhood if a western relief road could be provided as part of the project.

### **Strategic Site Option 2: Faygate Summary of Comments (30 Comments)**

Of the 30 comments on this Strategic Site Option, 29 were objections and 1 was in support of this site.

The 29 objections provide similar reasoning including;

- A need to retain the 'strategic gap' between Crawley and Horsham
- The character of Faygate will be lost due to the scale of the proposed development
- The High Weald AONB would be destroyed
- The A264 already congested at peak times, West of Bewbush development will add congestion and this site will take the road network beyond capacity
- Other infrastructure is not sufficient including sewerage capacity and education provision as well as the road network making the site an unviable option for development

The 1 comment of support suggests the infrastructure is already in place for development of this site and that Faygate would benefit from improvements to services and facilities such as local shops.

### **Site Options 3 and 4: North Horsham Summary of Comments (26 Comments)**

In total 26 comments were received in relation to Site Options 3 and 4. The majority of these comments were objection, however there were also a small percentage who supported the site options.

A large proportion of the objectors raised serious concerns about the potential erosion of the strategic gap between Horsham and Crawley. There was an overall view that the gap is an important landscape buffer that maintains the individual identities of the two settlements and also contributes to the setting of the nearby AONB and so must be retained. Other main concerns centred on the negative impact of any new development on the environment and character of the landscape. This is portrayed both directly, through building on countryside and greenfield land, and indirectly, through an increase in noise and air pollution from the A264 and negative impact on the character of Rusper village and its setting. There was also a particular emphasis placed on the whole area's potential for flooding.

Another common theme of the comments was that the current infrastructure would not be able to cope with such an increase in population and that there is a lack of services in the area already, without the potential population increase. Emphasis is made in the comments received on the potential huge increase of traffic on the already well used A264; the insufficient local amenities and services, such as convenience shops, schools and medical facilities, and the additional pressure that would be put on utility services, particularly water and sewerage.

Other concerns related to the position of the proposed sites stating that they would be cut off from the main Horsham urban area by the A264 and that development should be on disused land within urban areas, on land that has empty buildings and all available brownfield sites rather than on greenfield land.

The small percentage of supporting comments argued that the site is well situated as it sits within the Gatwick Sub-Region; is highly accessible to Crawley, Gatwick and the wider infrastructure network, and is not subject to any environmental or landscape designations. Comments also indicated that the sites had the potential for a sustainable mixed use development with particular opportunity for commercial and employment space due to its location. The advent of a station was widely mentioned and it's potential for expansion and increased parking capacity to promote a sustainable development. It was also suggested that the site could be delivered quickly due to support from a large percentage of landowners.

There was a general theme across all of the supporting statements that the site is well screened, has logical boundaries and has the potential to deliver what was considered to be a much needed boost to services and amenities in the area.

### **Site Option 5: Chesworth Farm Summary of Comments (115 Comments)**

In total 115 comments were made against Site Option 5, all were strong objections to the inclusion of the site in the Core Strategy Review.

The large majority of comments focused on several key issues of objection. The main concern was that the site is currently a valuable asset for the area providing an accessible resource for recreation for the enjoyment and well being of the existing community. Many of the respondents stated that they use it weekly, twice weekly or even daily for walking, cycling, dog walking and horse riding, making use of the many footpaths, cycle tracks and bridleways. Another main issue raised was that the site is a haven for the environment with a large variety of flora and fauna set within a beautiful part of the Sussex countryside that is advantageously easily accessible from Horsham town. The comments were unanimous in that they considered development on the site

would destroy an important well used greenspace that harbours a large variety of wildlife that once gone could never be replaced.

Another issue raised in many of the comments was that by allocating Chesworth Farm for development the Council would be going against its initial remit when it purchased the site to preserve it for wildlife and recreation. It was considered by respondents that this would destroy all of the good work the Council has done over the years to maintain and enhance it, particularly through the Chesworth Farm Management Plan. Some comments also referred to the fact that the site was previously put forward for allocation in the local plan, but was dismissed by an independent inspector.

The issue of infrastructure was mentioned frequently in the comments. There was a general concern that the existing infrastructure in the area would not support the increase in population that a new development in this location would bring. The concerns particularly focused on the inadequacy of access routes into the site and the resultant effect of traffic on the already well used Brighton Road. The lack of medical facilities and a local hospital was also a major concern.

Other common issues raised by respondents included the potential for flooding at the site from the nearby River Arun and the negative impact development would have on the character and setting of the listed building Chesworth House and the overall character of the town.

#### **Strategic Site Option 6: West of Southwater Summary of Comments (40 Comments)**

There were 40 comments received on Strategic Site Option 6: West of Southwater. The majority were objections, but there were also 5 support and a few general observations.

Many of the objections related to the size of the proposal, with thoughts that it was too many houses for Southwater. A proposal of this size would create an urbanising effect and turn the village into a town with the resulting loss of identity. It was considered that Southwater had already experienced significant recent development and that further development will stretch existing facilities, including the new village centre. If a new centre were to be included as part of the development respondents commented that it would split Southwater into two communities and the village would lose its focal point. Whilst respondents acknowledged that Southwater is a Category 1 settlement, it was stated that it does not have the same infrastructure provisions as Horsham and Crawley and, therefore, would not be able to support a development of this size. Respondents commented that a similar proposal was rejected by an Inspector in 2002 at an Examination in Public and they considered the basic objections to remain the same.

Another theme of objection was the potential impact of the development upon services and infrastructure, especially water and sewage capacity. With an increase in population (not just in Southwater, but including the surrounding area and Horsham) respondents commented that a new A&E hospital should be provided in the area and that the police force would also need to be expanded. Objectors also considered that the road network would not be able to cope with the additional traffic as they considered that many would need to commute to work due to the lack of jobs within the proposal. Comments were also received relating to education and specifically that Southwater does not need a new school.

Many of the other objections related to the environmental impact and the negative effect on wildlife in the area. Respondants stated that development should be concentrated on brownfield sites and should not be on farms and the countryside, which would also increase the flood risk within Southwater. It was considered that the development would lead to an increase in light pollution and affect the overall quality of life. The point was also raised as to why this development is required if there is going to be a change in Government and the whole system will change.

The comments in support of the option looked at the opportunities to increase the reliability of existing services, particularly water and sewage, but also telecommunications and broadband provision. Respondants considered that the development would also offer the opportunity to provide additional sport and education facilities and to improve the links to Christ's Hospital. Respondants suggested that the development and architectural style should be similar to existing Southwater developments and that there should be a range of affordable housing provided (1 and 2 bed, single parent, elderly, disabled, short term homeless).

Supporters of the option said that it would allow the housing numbers to contribute to either 'Gatwick' or 'the rest of the District', or both and that the close location to the main road network would help with the additional traffic generated.

Observations made regarding Southwater were similar to points made either objecting or supporting to option. These included improving links to Christ's Hospital station and improving public transport links, including cycling. Other observations included improving green spaces and that the housing numbers should contribute to the 'Rest of the District' and not the Gatwick Sub-Region.

### **Issue 9: Appropriateness of Site Options (15 Comments)**

**Do you agree that these are the appropriate site options to be considered within the Gatwick Sub-Region and that the summary of opportunities and constraints in each case is an accurate reflection of the issues at this stage?**

There were a total of 15 comments received on Issue 9. Of these comments 4 were of observation, 9 were of objection and 2 were of support. The observations were mixed between the site options being generally appropriate, although concerns about the opportunities and constraints assigned to each site option, and that they should not be at the expense of an appropriate spread of development throughout the District; and the site options being inappropriate and the opportunities and constraints being an inaccurate reflection of the issues at this stage. One observation was that the assessment of the West of Ifield site option is correct and that the South of Horsham site option could provide a significant amount of additional housing, employment and community facilities for the District, although for both site options, the needs of the entire community would need to be and there would need to be significant improvements to the transport network in the Gatwick Sub-Region. It was flagged, however, that the transport network of the Gatwick Sub-Region cannot be provably assessed until the West of Horsham and West of Bewbush development are complete. Investigations for a new market town should be further investigated with adjoining authorities and the West of Southwater site option should be included within the Rest of the District and not the Gatwick Sub-Region because of its location outside the Gatwick Sub-Region boundary drawn by the South East Plan.

The comments of objection concentrated around the matter that the 6 site options are not appropriate site options for the Gatwick Sub-Region as the constraints significantly outweigh the opportunities and the summary of opportunities and constraints are not an accurate reflection of the issues at this stage as they are far too simplistic and there are many other constraints that have not been identified. Most of the objections focussed around the West of Southwater site option and how, in the Site Appraisal released with the Core Strategy Review Consultation Document, it was identified that the site option could either contribute wholly to the Gatwick Sub-Region, Rest of District or both, but in the Core Strategy Review Consultation Document itself it is only identified as contributing to the Gatwick Sub-Region alone. Further clarification of this boundary should be sought. The general feeling was that the West of Southwater site option should contribute towards the Rest of The District housing requirement and that any development at Southwater should be of a smaller scale to meet specific local needs. The site option appears, at the moment, to be driven by the provision of a new secondary school but this should stand outside Council policy as it is a West Sussex County Council responsibility. Another objection was that there has not been enough exploration into what opportunities exist to deliver the identified housing provision requirements with adjoining local authorities and that any further Greenfield development should be restricted to the creation of new communities (Strategic Spatial Option 3).

The comments of support were that the site options identified for the Gatwick Sub-Region are appropriate as they are concentrated around the 2 towns (Horsham and Crawley) that are best able to cope with development of this scale. It was noted, however, that the West of Southwater site option should be included within the Rest of the District and not the Gatwick Sub-Region

### **Site Option 7: East of Billingshurst Summary of Comments (817 Comments)**

There were 817 comments received on Site Option 7. Most were comments of objection, but there were a small number of supportive comments. A large majority of the comments received were standard in nature.

The objections focused generally on three key areas; the detrimental impact of development on the existing countryside, the inability for the existing infrastructure to cope with such an increase in population, and the fact that an almost identical plan was rejected by the Council in 2006.

#### **Detrimental impact on the existing countryside**

On the whole most of the objections referred to the potential detrimental impact new development would have on the countryside in the area. Overall respondents considered that development would override the natural boundaries of the village and would be highly intrusive to the character and quality of the current landscape.

It was argued that Daux and Rosier woods and fields within the potential development area are of high quality landscape quality harnessing a wide variety of flora and fauna that should be protected. Comments referred to a planning application for development on the south side of Rosier Wood in 2007 that was rejected by Horsham District Council due to its proximity to the wood and the potential for damage. Therefore comments were made that if this was the case previously, the potential site should be considered unacceptable.

It was also considered that developing on greenfield land would not only generate significant CO<sub>2</sub> emissions, but would also take away the fields and woods that help to absorb it. Many comments referred to the huge detrimental and irreversible effect the development would have on the nearby Sites of Nature Conservation Importance and the potential for surface water flooding across the whole site.

Another common theme was that the current land is and has been enjoyed by local residents for many years providing a natural and rural environment for recreational activities.

### **Infrastructure**

A large amount of objections concerned the existing infrastructure in the area which is considered inadequate to cope with the demands of a development of the size proposed. There were particular concerns about the increase in traffic that would be generated on the already busy road system in the area and the existing railway station which respondents commented was already at capacity at peak times.

Many comments referred to the current oversubscription at the village schools commenting that they have minimum room for expansion and would certainly not be able to accommodate an increase in population. There were also major concerns about the dramatic increase in anti social behaviour that has resulted from the previous western extension of the village and respondents feared that a development of the size under consideration would only exacerbate the existing problem.

Another issue frequently raised by respondents was the lack of employment opportunities that the new population would have in the local area. There was subsequently concern over the need for the majority of the new population to commute out of the area, thereby intensifying the use of the road and rail networks.

### **Previous plans**

A large proportion of comments suggested that Billingshurst had yet to absorb the recent significant development on the western side of the village. Many comments also referred to the almost identical proposal for new development in Billingshurst by the Council in 2006 that was rejected by an independently appointed Inspector at an examination in public. Therefore respondents considered that the same grounds for rejection still exist.

A small number of supporting comments were made which argued that the delays in the delivery of the West of Horsham and West of Bewbush allocations mean that the Council is under increasing pressure to meet housing numbers. It was also suggested that Billingshurst is well placed to meet the housing needs of both the Rest of the District area and the Gatwick Sub-Regional area.

Other comments argued that a new development would help to facilitate the provision of new infrastructure and would be a positive move to reinvigorate the current high street shopping offer.

### **Strategic Site Option 8: Adversane/ North Heath Summary of Comments (559 Comments)**

In total there were 559 comments made against Site Option 8. The majority of which were objections, however there were also four general observations. A summary of the main reasons for objection to this strategic site option are summarised below;

#### **Summary of Objections**

Generally speaking the 555 comments of objection focused on similar reasons why a strategic development in the North Heath/ Adversane area would not be suitable. Specifically consultees were concerned about the following points:

##### **Wildlife & Biodiversity**

- The potential impact on wildlife, flora and fauna on the greenfield site.

### **Services**

- The impact on essential services in the area which already appear to be at capacity, specifically this relates to schools, hospitals (including A&E department) dentists and GPs surgeries.
- The lack of suitable leisure facilities in the area.
- The lack of local shops to support 4,000 new homes.

### **Transport & Climate Change**

- The fact that a development of this nature would promote private car use, therefore there would be a resulting impact on the local transport network which is already at capacity. It was highlighted that delays and congestion are experienced almost daily in the vicinity of Brinsbury College and the junction between the A283 at Pulborough and the A29. There was also concern that the extra traffic on the roads, would require a widening of certain roads, including the A29, causing additional damage to local wildlife and tranquillity.
- The impact of climate change resulting from the potential rise in congestion.
- The already poor service on the Arun Valley rail line and the impact a new station would have, given the fact there would then be three railway stations within three miles of each other.
- The loss of footpaths and bridle ways through the countryside.

### **Infrastructure**

- Electricity supply capacity; a number of consultees highlighted that power companies predicted power-cuts last winter as they were unable to meet demand.
- Clean water supply and sewage treatment capacity; many consultees pointed out that there have been droughts and hose pipe bans in recent years.
- Broadband speed is limited and would need a significant upgrade to support such a large population.

### **Local Landfill**

- The fact that there is already limited landfill capacity in West Sussex, therefore increased development will only add to this.

### **Flood risk**

- Flood risk resulting from increased run-off from the rise in total area of hard-standing.

### **Landscape Character & Archaeology**

- The potential coalescence of Billingshurst and West Chiltington.
- Further development pressure to the north and south of the development area, leading to a Pulborough/Adversane/Billingshurst conurbation.
- The impact new development would have on the existing tranquillity, rural character and natural beauty of the area.
- The loss of agricultural land.
- The site adjoins one of the oldest neolithic sites recently excavated at Beedings Castle and one of the most anciently inhabited part of the Sussex countryside, if not in the U.K. It is also adjacent to the Roman remains at Borough Farm and one of the most ancient of roads, Stane Street.

### **Social Impacts**

- The potential rise in crime levels from the expanded population, exacerbated by the fact that there is no police station within the local area which has a public reception.
- The lack of facilities for young people, causing a potential increase in crime.
- The potential for the new town to be a dormitory settlement for London commuters, and therefore lack of community cohesion.

### **Economy and Employment**

- The availability of employment opportunities for the new residents.
- Lack of parking in the village.
- The impact a new village centre would have on the existing businesses in Pulborough and Billingshurst.

A vast majority also stated that development should be focused on brownfield sites and at the edge of existing settlements rather than greenfield locations.

There was also a comment that the suggestion that the Adversane site would benefit from being adjacent to the Brinsbury Campus was a tenuous one, as the campus currently only employs 150 staff, it was considered unlikely by respondents therefore that, even in a decade, the centre would provide employment opportunities for the significant numbers of population arising from a new development. Respondants quoted from Brinsbury Centre of Rural Excellence SPD which does not support strategic development in this area. "Development should reflect the rural location of the Brinsbury Campus and be related to the objectives of the Centre of Rural Excellence with regard to land-based education and training and the linkages with rural enterprises. Development should not detract from the rural environment, and should include provision for landscape enhancement"

[http://www.horsham.gov.uk/strategic\\_planning/brinsbury/](http://www.horsham.gov.uk/strategic_planning/brinsbury/)

It was considered by respondents that the proposed development was not consistent with a variety of South East Plan policies, including CC1 and CC6.

### **Other General Comments**

In addition to the 555 objections received, there were also four recorded as observations although these also provided reasons why development in this area may not be suitable; in particular they highlighted that the area is greenfield land which is prone to flooding and congestion. There was also concern that development would destroy essential habitats, biodiversity and the landscape character of the villages of Pulborough, West Chiltington and Billingshurst and that the area has limited infrastructure to support a new development; schools are full, hospitals are overloaded and reservoirs are struggling to cope with supply.

### **Site Option 9: Pulborough Expansion Summary of Comments (85 Comments)**

85 comments were submitted against Site Option 9. The vast majority of comments were objections and 2 supported the proposal.

Most of the objections received referred to the potential development of the West Glebe field. Comments stated that it is an extremely important site to Pulborough and of ancient and historic significance that should not be developed, particularly as it is protected by the Conservation Area. Respondants set out that it is considered a green lung in the village with a rich natural habitat. They considered that development would have a significant detrimental impact on the character of not only the adjacent ancient church but the village as a whole. Many comments also pointed out that it is accessed via a small overused road that would not have the sufficient capacity to provide for any new development.

Many comments suggested that any development in the Pulborough area would result in the destruction of the beautiful Sussex countryside and the village would lose its identity. There is also a general consensus that the community is already overcrowded and any further development would result in the reduction of the quality of life for local people.

A large proportion of the comments also raised concerns over the ability of the existing infrastructure, services and facilities to cope with further development. It was generally felt that local facilities are at capacity and an increase in the population would put an intolerable additional demand on health provision, schooling, and transport infrastructure, particularly on the A29. Comments also suggested that there is a lack of local employment opportunities for the potential new residents and before any new development can be built parking facilities at the station would need to be addressed so that it could accommodate more commuters.

Other comments considered that the railway line provides a good natural boundary for development and there are sufficient brownfield sites in the District for development without having to build on greenfield. It was also suggested by a number of consultees that the new developments that have been built in Pulborough over the last few years have not sold thereby showing that further development in the village is not needed.

Two supporting comments were received against this site option. They stated that Pulborough is the most sustainable option in response to the provision of 3800 dwellings in the Rest of the District as specified in the South East Plan. It is argued that if development is carried out in a sensitive manner and brings benefits to the local community then it can be seen as a positive thing. Comments suggested that there is a need for some development in Pulborough in order to allow the village to grow to meet local needs and encourage increased shopping provision.

#### **Issue 10: Appropriateness of Site Options (21 Comments)**

**Do you agree that these are the appropriate site options to be considered within the Rest of the District and that the summary of opportunities and constraints in each case is an accurate reflection of the issues at this stage?**

There were a total of 21 comments received on Issue 10. Of these 21 comments 3 were observations, 18 were objections and none were of support. The comments of observation concentrated on the matter that additional land needs to be identified in / around Billingshurst and Pulborough, although it was considered that Billingshurst could accommodate more than Pulborough, due to its constraints. It was considered that Billingshurst should accommodate the housing land supply shortfall rather than the strategic site option of Adversane / North Heath. It was flagged that due to the scale of Adversane / North Heath, the development might not be accommodated within the plan period therefore offsetting the housing land supply requirements to elsewhere in the 'Rest of the District'. The point was also raised that if insufficient appropriate sites could be found then a smaller village extension in this location might be more feasible.

The majority of the objections thought that the summary of opportunities and constraints was neither an accurate nor adequate reflection of the issues at this stage as the constraints for the Rest of the District site options outweigh the opportunities. It is also felt that not all the site options which are available within the Rest of the District had been identified / explored and development should be considered at the larger Category 1 rural villages where there are a large number of locations where small / medium scale development could take place, as the 3,800 new homes by 2016 target will be met best by infill's to existing communities. There is also the general feeling that targeting the villages along the transport corridor for development is not the most sustainable option due to the rural nature of the District and that brownfield sites in marginal areas around Horsham and Crawley are more supportable options or to spread development around appropriately and build the housing where it is needed. Although there was 1 comment about the merits of a new village and new town, as this would remove the need for large ad-hoc extensions to existing communities, objections were made against all 3 site options in the Rest of the District (Billingshurst, Adversane / North and Pulborough), on the grounds of the environmental impacts they

would have on the District and the lack of infrastructure in place. It was felt that Southwater should be included in the Rest of the District to help address the shortfall.

### **Issue 11: Combinations of Locational/Site options (13 Comments)**

**Do you agree that these are the appropriate combinations of locational/site options to be considered further at this stage or are there other approaches/combinations that should be explored in more detail?**

There were a total of 13 comments received on Issue 11. Of these comments 3 were observations, 9 were objections and 1 was of support. The comments of observation focussed around the matter that all possible combinations and approaches should be explored in more detail. There is a focus on the expansion of the Billingshurst and Pulborough site options and in particular that the Billingshurst expansion could perhaps be increased. It was noted that there is additional capacity for small scale growth in some of the other villages and that part, if not all, of the West of Southwater site option should be included within the Rest of the District to help address the shortfall.

The majority of the objections felt that focussing development on the most sustainable existing settlements was the most sensible approach and that the expansion of Billingshurst, Adversane / North Heath and Pulborough does not provide sustainable solutions to fulfilling the requirement of the Rest of the District, as none of these sites have good road / rail links. Comments stated that the approach is inflexible and assumes that Strategic Spatial Option 1 is the favoured option, as there is little inclusion of the combinations available should Strategic Spatial Option 1, 3 or 4 be chosen. It was felt that further investigation is needed into smaller scale development throughout the District and the opportunities for bringing forward development within Category 2 settlements, as there appears to be flaws in distributing the required housing provision to large scale strategic sites (as can be seen by the delay of the West of Horsham / West of Bewbush strategic sites). Concentrating affordable housing in limited locations was also a concern as it would mean that the shortages of affordable housing in the Rest of the District will not be addressed and that there is a need to look to support the provision of affordable housing in every settlement. A couple of the comments mentioned that the combinations are not appropriate as they do not take account of the potential for creating new settlements and until further work to examine the new settlement options is done, it is inappropriate to give further consideration to the current options, however a new settlement in the A23 corridor may best meet the Districts housing requirements.

The 1 comment received of support considered that these were the principle options and thought that the West of Southwater site option should be included within the Rest of the District.

## Issue12: Landscape and Townscape Character (11 Comments)

Do you agree that these are the appropriate considerations relating to the issue of Strategic Gaps or are there other factors that should be explored in considering the way forward?

In total eleven comments were received against Issue 12 and the majority of these were found to be supportive (although a mixture of support, object and observation was recorded).

Of the eleven comments received, four expressed a strong desire for the retention of the term 'strategic gap' on the basis that it is now widely understood by a range of parties. It was recognised that the term 'Strategic Recreation Area' has been used to refer to the gap between Horsham and Southwater, and whilst one respondent accepts this as a reasonable alternative, there was general concern over what the term would actually mean, as it is not qualified in national law or the South East Plan (SEP). The cause for concern identified relates to the type of uses which may be considered appropriate for inclusion within such a location as there has been no debate on this. In light of this, one respondent highlights the fact that while a golf course with low level ancillary buildings may be appropriate, a football stadium would not.

A further two comments recognised the need to reconsider the use of the term 'strategic gap' due to its lack of recognition in the SEP and suggested that instead the emphasis be placed on the retention of the individual character of the settlements. This idea was supported by three further comments which suggested that any replacement policy should pro-actively encourage uses which are appropriate in the sensitive countryside and urban fringe locations which were previously identified as 'strategic gaps'. In overall terms, the general consensus of all seven comments was that the overall character and distinctiveness of the urban areas within the District is maintained, including the surrounding countryside locations which contributes towards that character.

The two comments which posed a clear objection to the issue did so because they felt that the term 'strategic gap' could be removed all together. The rationale behind this was that national countryside policy should be enough to control development. One respondent also recorded that major development between Horsham, Christ's Hospital and Southwater seemed sensible given the fact that Horsham is no longer the market town it once was.

## Issue 13: Environmental Quality (7 Comments)

Do you agree that these are the appropriate considerations relating to the issue of sustainable construction and renewable energy or are there other factors that should be explored in considering the way forward?

Seven comments were received in relation to this issue and of these 3 were supportive and 4 placed objections. Of the four respondents which placed objections, one was done so on the basis that they saw no point in setting local targets which go beyond national planning policy, a second felt that further research was required to identify the cost implications of enforcing sustainable design standards, whilst the remaining two felt that the considerations identified in the '*Leading Change in Partnership...*' document did not go far enough in addressing the full range of environmental issues identified in the SEP. It was felt that other SEP policies not fully considered in the document included; NRM1 Sustainable water resources & groundwater quality, NRM2 Water quality, NRM5 Conservation & improvement of biodiversity, NRM7 Woodlands, NRM9 Air quality and NRM11 Renewable energy. There was also concern over the lack of commitment to set effective sustainable construction, renewable energy and waste and water recycling targets and the lack of acknowledgement that a key environmental factor which should be considered is the effect of travel between homes and places of work and that this could be minimised by targeting development in those locations.

## **Issue 14: Improving the Quality of New Development (6 Comments)**

**Do you agree that these are the appropriate considerations relating to the issue of sustainable construction (zero carbon homes) and local character/distinctiveness or are there other factors that should be explored in considering the way forward?**

Six responses were received in relation to Issue 14. Of these comments, 2 were supportive, 2 objected and 2 were general observations.

The general theme of the comments received was that more control was needed over the quality of building design. There was support for the point that too many buildings in the District have a 'could be anywhere quality', however it was felt that this could be avoided through the use of first class urban designers and architects. With this in mind there was a recommendation that policies should include a commitment requiring developers of larger schemes to sponsor design competitions and use professional design advice from design panels

There was also support for additional small scale, windfall development within villages, rather than opting for new 'faceless' estates within the countryside. As this is the 'natural way in which villages have been formed and sustained, therefore further development of this nature would help assist the sustainability of the services within these areas without having a noticeable impact.

Additionally, there was a general agreement that zero carbon homes would require different designs to those which have been built in recent years, however it was felt that no evidence was available suggesting this would mean incompatibility with local character. It was recommended that the Council become the 'thought leader' on the kind of communities and build designs which are acceptable in the District rather than passively reviewing plans submitted to it.

There was also a suggestion that the considerations did not meet the requirements of SEP policies CC4; Sustainable Design and Construction of NRM11 Natural Resource Management which encourage LPA's to promote best practice in sustainable construction.

## **Issue15: Built-up area Boundaries/Category 1 & 2 Settlements (92 Comments)**

**Do you agree that these are the appropriate considerations relating to the issue of the designation of Category 1 & 2 settlements or are there other factors that should be explored in considering the way forward?**

A total of 92 comments were submitted in response to Issue 15, 7 making observations, 76 objections and 9 comments in support. The response to this Issue in the main did not focus on the actual question of whether the appropriate considerations relating to the designation of Category 1 and 2 settlements had been put forward or whether there were other factors to explore, but rather they commented on the potential outcome of the review process, i.e. whether or not the categorisation should be changed.

The vast majority of the objections submitted related to the views of residents of West Chiltington who felt strongly that the village should not be re-categorised from its current designation as a Category 2 settlement because of the impacts of any development beyond that related to local needs on the character of the village. Some parties who felt that there should be some re-categorisation also lodged their comments as objections; the view was taken that appropriate development of smaller settlements can improve sustainability and be shown to be capable of enhancing the role the settlement provides in the surrounding rural area. There was also a feeling that the current designations lack logic and consistency, and that the application of the policy has not offered protection from strategic level development to Category 2

settlements because of the re-categorisation of Broadbridge Heath to a Category 1 settlement. There was concern that the 'clearer flexibility' mentioned in relation to the current policy would simply involve allowing development which is not currently permitted in order to make it easier for developers and that this would be done without further consultation. Whilst some parties recognised that clarification of the policy approach would generally be good, there was concern that this should not be used to allow development wherever it is promoted and that the basis of the policy must be properly applied and enforced. It was also considered that the policy is quite clear in its intent and restricts market housing coming forward; it needs to be reviewed to allow small scale infilling within Category 2 settlements in order to support local services.

The support expressed in the context of this issue was largely for the review of the current approach of the re-categorisation of settlements, primarily in order to improve the sustainability of smaller villages on the basis that no change means shackling economic growth and sustainability, with some specific suggestions for re-categorisation from Category 2 to Category 1. A clear distinction between Category 1 and 2 settlements was supported in view of the different sustainability considerations applying and the need to facilitate the managed release of housing sites in Category 1 settlements. A view expressed was that all defined settlements are capable of accommodating either strategic level development if appropriate or development which is directly related to local needs. It was suggested that the categorisation should be used alongside an assessment of local needs and landscape capacity in considering locations for new development. It was considered that all defined built-up areas should be kept in order to secure a sustainable pattern of development and to limit the spread of settlements.

#### **Issue 16 - Employment Provision (7 Comments)**

**Do you agree that these are the appropriate considerations relating to the issue of employment provision and the local economy or are there other factors that should be explored in considering the way forward?**

Seven comments were received on this Issue, 5 of which were observations and 2 were objections. Generally the comments agreed with the opportunity that the Review provides in revisiting the current employment provision and allocations. The comments widely considered that employment opportunities should be concentrated on existing centres and within or adjacent to the proposed strategic allocations and should therefore be included within the Strategic Site Options rather than set out as a separate issue. It was further considered that employment provision is not sufficiently addressed in the Review and that the proposed provision is disproportionate to the amount of housing being considered. It was suggested that a comprehensive strategy is required to address employment needs for such a large population increase with sufficient detail for it to be implemented.

#### **Issue 17: Meeting Housing Needs (15 Comments)**

**Do you agree that these are the appropriate considerations relating to the issue of meeting housing needs and affordable housing or are there other factors that should be explored in considering the way forward?**

Fifteen comments were received – 4 in support, 6 objecting and 5 observations. It should be noted that in some cases those who were objecting were making the same comments as those who categorised their comment as an observation or a support.

Six respondents, including the South Downs Joint Committee, the Campaign for the Protection of Rural England (CPRE), Southwater Community Partnership, West Grinstead Parish Council and A+New Homes (a Housing Association) specifically stated that the 40% target for affordable housing should be maintained, as there is a

continuing and increasing need for affordable housing. A+New Homes qualified this by recommending that each site should be assessed regarding viability. One respondent felt that 40% was too high on Brownfield sites, and suggested a reduction to 20%.

There was overall agreement that affordable housing should be provided in developments of between 5 and 14 dwellings, and that flexibility should be built in. If local need is great, then the proportion could be higher than 20%.

Respondants generally agreed there was a need for affordable housing in villages – CPRE emphatically stated that affordable rural housing is of paramount importance in supporting the countryside in terms of local communities and businesses. There was a difference of opinion on whether open market housing should be allowed, particularly on infill or Brownfield sites, with two respondents taking the latter view.

The Horsham Society recommends that work should be done on establishing clear affordable housing need throughout the District and that affordable homes should be built to the same standards as open market dwellings.

Respondants underlined the need to provide information on the level and type of housing need, with a particular view to providing suitable accommodation for younger and older people. The point was also made that housing need should not just equate to affordable housing – there are other forms of housing need to address, such as specialised housing to meet older people’s needs across a range of tenures.

One respondent asked whether the new Community Infrastructure Levy would provide benefit for existing residents, or only refer to new development.

### **Issue 18: Infrastructure Requirements (9 Comments)**

**Do you agree that these are the appropriate considerations relating to the issue of addressing infrastructure requirements and the possible introduction of the Community Infrastructure Levy in the District or are there other factors that should be explored in considering the way forward?**

There were 9 comments made against Issue 18: Infrastructure Requirements. Of the 9 comments received, 2 were in support, 4 objected and there were 3 observations.

The Community Infrastructure Levy (CIL) received support from respondents, as it seems a good way forward, and there was general support for the continuation of the basic principles (new development to be accompanied by the infrastructure and facilities that are required to support it) established in the adopted Core Strategy 2007.

Concerns were raised that CIL was too wide in scope and that it should to be linked to the local communities directly affected by any new development. It was also highlighted that the necessary improvements to infrastructure should be identified first, before any approval for new development. Respondents stated that in cases where planning gain cannot meet all the necessary infrastructure requirements, alternative sources of funding should be investigated and identified. Further comments relating to CIL noted that it should not be set too high as to harm the economy and the infrastructure plan should not only consider deliverability but also sustainability. This should also include the rural economy, the environment and the countryside.

Observations were made regarding the overall balance of planning obligations / levies and ensuring that projects are not delivered without infrastructure because of viability. There were further observations made regarding other sources of funding and that infrastructure provision relating to commercial companies should be covered by commercial opportunities and regulatory control, whereas planning obligations should help to meet the needs of transport, health and education. To help ensure delivery, comments were made that the Council should liaise with developers and infrastructure providers throughout the process to ensure that developers are aware of what is

required. It was considered by respondents that CIL should not be used in addition to S106 as this would reduce viability.

### **Issue 19: Inclusive Communities (6 Comments)**

**Do you agree that these are the appropriate considerations relating to the issues of addressing the needs of an ageing population and the gypsy and traveller communities in the District, or are there other factors that should be explored in considering the way forward?**

There were 6 comments received on Issue 19, all of which were observations. Comments generally agreed with the Review's considerations for the ageing population but widely suggested that development should be driven by local community requirements, needs and age profiles. Reference to travelling show people was also welcomed and support was given to the concept of a flexible approach, based on continued local dialogue, to identify sites and meet the needs of the travelling community. However, it was also considered that a generic policy on social inclusion would not be sufficient to meet the varying needs of the specific groups.

### **Issue 20: Vitality and Viability of Existing Centres (4 Comments)**

**Do you agree that these are the appropriate considerations relating to the issues of addressing the opportunities to maintain the role of the town and village centres in the District, or are there other factors that should be explored in considering the way forward?**

There were 4 comments received on this particular issue that focused on the need for more retail in existing centres to ensure vitality and viability and the need to encourage more tourism and recreational activities such as hotel accommodation. It was suggested that focusing development on existing settlements was the best way to ensure the vitality and viability of existing centres is maintained. Comments also stated that consideration should be given to ensuring any new development outside centres is not left without any facilities, and policy criteria should require the same high standard of design as everything else.

### **Issue 21: General Comments (5 Comments)**

**Do you have any suggestions as to which development management issues or current policies need to be incorporated in the Core Strategy Review document?**

There were 5 general comments on development management issues. Three of which were concerned about issues such as the recession and suggested that policies need to be more flexible to respond to changing circumstances, for example, by enabling the relaxation of S106 contributions during such times to encourage development. It was also recommended that the release of land for housing development be linked to the demand for housing and the provision and take up of employment space so as to ensure that housing is not delivered unnecessarily, eating into the Districts Greenfield space contrary to the Countryside and Landscape Management provisions of the SEP (Page 145, para 11.2).

There was also a suggestion that the topics do not adequately reflect the requirements of SEP Policy C4 which requires LPAs to develop criteria-based policies ensuring all development respects and enhances local landscape character, secures appropriate mitigation where damage to local landscape character cannot be avoided and ensures early consideration is given to landscape and biodiversity enhancement, woodland management, recreation provision and access routes.

## **Chapter 4: Delivering the Spatial Strategy for Horsham District (0 Comments)**

### **The Importance of Partnership Working (1 Comment)**

Only one comment was made against this section stating that the content of this section lacks any firm commitments and questions how willing Horsham District Council are to work in partnership with other parish councils and relevant bodies.

### **Securing infrastructure, services and facilities (0 Comments)**

No comments were made against this section

### **Sustainability Appraisal/Strategic Environmental Assessment (1 Comment)**

One objection to paragraph 4.7 received stating that Environmental Impact Assessments are an inexact science meaning there can be; 'a temptation to use the results selectively to support a policy already decided upon'. The objector calls for an assurance that 'these assessments will be undertaken by independent qualified Environmental Auditors and made public.

### **Next Steps (1 Comment)**

An objection against paragraph 4.12. This paragraph states the next steps in producing the Preferred Strategy document and the consultation processes. The objection suggests that the process should be delayed with an impending general election. The argument is that if a Conservative government was to come to power, regional planning would be abolished, and so the validity of the South East Plan and the housing targets would be questionable perhaps meaning development of housing on the scale currently proposed in the Horsham District would not be required.