



Slinfold Parish Council

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If objecting, please indicate what change(s) would you like to see made to the Development Plan Documents also indicating why you want this change having regard to the tests of soundness listed above. Please be as precise as possible, mentioning sections of the document to aid interpretation of Changes to the Documents.

Test of Soundness

2. It has NOT been prepared in compliance with the Statement of Community Involvement, or with the minimum requirements set out in the Regulations where no statement of community involvement exists.

Core Strategy Policy CP4

CP4 states that *'provision is made for the development of at least 10,575 homes and associated infrastructure in the District within the period 2001 – 2018.'*

The Council OBJECTS to this policy, as both the Issues and Options and Preferred Options consultations were based on the period 2001 – 2016 making comparison of the housing numbers extremely difficult.

Changes to the Document: That Horsham District Council re-consult on the new time scale.

Core Strategy Policy CP4

CP4 states *'the development of land west of Horsham for 2,000 homes'*.

The Council OBJECTS to this policy, as both the Issues and Options and Preferred Options consultations were based on a development of 1,250 homes on land west of Horsham.

Changes to the Document: That Horsham District Council either reduce the number of houses in accordance with the latest expression of the Regional Spatial Strategy – the West Sussex Structure Plan to 1,000 houses, or re-consult on the increased number of houses.

Page 24, bullet 3.9

Bullet 3.9 states that *'for Broadbridge Heath, in particular, further change is inevitable'*.

The Council OBJECTS to this statement as Horsham District Council have no substantiating evidence to confirm this statement.

Changes to the Document: Horsham District Council to substantiate this statement.

Page 31, bullet 4.6

Bullet 4.6 states *'The scale of proposed development west of Horsham up to 2018 is a reflection of the relationship between the physical characteristics of the area involved and the need for specific infrastructure, including community facilities, as an integral part of the development process.'*

The Council OBJECTS to this statement, as there is no supporting evidence to justify the scale of the development to pay for the supporting infrastructure required.

Changes to the Document: Horsham District Council to provide the evidence that 2,000 houses are required to provide the necessary infrastructure.

Page 51, bullet 4.41

Bullet 4.41 states *'enabling the opportunity for a new park and ride Facility'*

The Council OBJECTS to this statement, as there is no supporting evidence to justify the need for additional park and ride site on the periphery of Horsham. Indeed, the current Park and Ride at Hop Oast is only working at 40% capacity – Horsham Town Park & Ride Study 2005, para 2.1.

Changes to the Document: Removal of the Park and Ride facility for land west of Horsham.

Page 51, bullet 4.41

Bullet 4.41 states *'and including enhancement to the Leisure Centre facilities and the potential for specific provision to meet the needs of both Broadbridge Heath and Horsham Football Clubs'*.

The Council OBJECTS to this statement, as the Issues and Options and Preferred Options consultations consulted on the Horsham Football Club being located on the eastern side of Horsham.

Changes to the Document: Removal of the allocation of land for the Horsham Football Club at land west of Horsham.

Proposals Map 17

Area G at Gatefield Cottages

The Council OBJECTS to this change to the built up area boundary, as it is a developer led change. The Parish Council did not object to the boundary at the Issues and Options and Preferred Options consultation stages. In fact, at the Issues and Options consultation stage, Horsham District Council stated, *'Include the curtilage of Gatefield Cottages. The land to the rear should not be included as it opens out into wider countryside.'* This land forms part of the central fields of the parish, formed from common land circa 16th and 17th centuries and is a unique and valued characteristic of this parish, recorded in the Slinfold Parish Design Statement pages 5, 17 and 21. This boundary also follows the natural watercourse.

Changes to the Document: Return the boundary at Area G to that shown in the Issues and Options and Preferred Options consultations so that it does not include the curtilage of Gatefield Cottages.

Proposals Map 17

Area N at Spring Lane

The Council OBJECTS to this change to the built up area boundary. This land also forms part of the central fields of the parish, formed from common land circa 16th and 17th centuries and is a unique and valued characteristic of this parish, recorded in the Slinfold Parish Design Statement pages 5, 17 and 21.

Changes to the Document: Remove the gardens of the properties in Spring Lane from the built up area boundary.

Test of Soundness

3. The plan and its policies have NOT been subjected to sustainability appraisal.

Sustainability Appraisal, page 35 bullet point 4.11

The Sustainability Appraisal states *'The document also sets out the requirement for the District to accommodate 190,000m² of employment floorspace and 9,335 dwellings, of which 2,500 are to be accommodated west of Crawley and 1,000 west of Horsham.'*

The Council OBJECTS to the Sustainability Appraisal for the strategic location west of Horsham as it is based on a development of 1,000 houses, yet the submission stage documents plan for a development of 2,000 houses on land west of Horsham.

Changes to the Document: The Sustainability Appraisal should be done again on 2,000 houses at the strategic location west of Horsham and there should be a re-consultation on the submission stage documents.

Core Strategy Policy CP2

This policy states that *'...careful appraisal of development proposals to ensure that they provide for enhancement by...having no adverse effects on water quality, reduce water consumption and minimise flooding'*.

The Council OBJECTS to the development of 2,000 houses at the strategic location west of Horsham as the greater number of houses will be built close to the floodplain. The 1,000 houses identified in the West Sussex Structure Plan could be accommodated more easily to avoid putting pressure on the floodplain. This area is already very prone to flooding, a considerable problem in the parish of Slinfold. This Council suggests that building 2,000 houses so close to the floodplain is a high risk and may make these properties unsaleable if insurers and mortgage companies identify them as a high risk.

Changes to the Document: Horsham District Council should consult extensively with the Environment Agency on the floodplain and potential flood risk, in line with draft Planning Policy Statement 25.

Core Strategy Policy CP7

Policy CP7 states that *'the impact of the new development on the existing transport network should be minimised.'*

The Panel Report on the adopted West Sussex Structure Plan states *'One constraint on [the development] is the timing of improvements to the single carriageway A24 between Warnham and Capel. ... There is general acceptance that strategic scale development at Horsham should not proceed until this is complete ...'* (West Sussex Structure Panel Report - para 6.56).

This Council asks how the Sustainability Appraisal can account for this road network when the timescale for the improvements to the A24 Warnham to Capel improvements is, at best, sketchy. The A24 was given a priority of 4 out of 9 by the Regional Transport Board (para 9.2, minutes of 07 October 2005), with priorities 1 and 2 to be completed before 2010/11.

The Regional Transport Board stated *'It was recommended that all identified priority 1 and 2 items should be included in the forward programme to 2010/11. However, from 2010/11 there would be a need to think about priorities. In doing so there is a need to work through sub regional strategies and their infrastructure requirements. The recommendation is that a forward working programme is agreed for 2010/11 as a starting point to feed into the debate.'*

Changes to the Document: This Sustainability Appraisal is flawed without a specific timescale for the improvements to the A24, particularly since the West Sussex Structure Plan Panel Report said that the strategic scale development at Horsham should not proceed until the improvements to the A24 are complete.

Core Strategy Policy CP7

The area for development for the strategic location west of Horsham is identified as *'within the area west of Horsham bounded by the A264 to the north west, the River Arun to the south west and the railway to the south east.'*

Southern Water objected to this development at the Preferred Options stage because it is too close to the sewage works. The Panel Report on the adopted West Sussex Structure Plan stated that *'Staying with the sewage works, it is cited by local groups as a major constraint because of smells. We agree that development would need to be kept well away from the facility but floodplains may dictate this in any event'* (West Sussex Structure Plan Panel Report - para 6.39).

Changes to the Document: Reduce the number of houses at this strategic location to 1,000 as stated in the latest expression of the Regional Spatial Strategy, the West Sussex Structure Plan, so that the development does not need to be in such close proximity to the sewage works.

Core Strategy Policy CP3

This policy states that *'development will be expected to...complement the character and heritage of the District'*.

Core Strategy Policy CP7

This policy states that *'the development should be integrated with Horsham and Broadbridge Heath.'*

The Council OBJECTS to the development of 2,000 houses at the strategic location west of Horsham as it will spoil the special character of Horsham as an historic market town, surrounded by character villages. A development of 2,000 houses will lead to the convergence of Broadbridge Heath into Horsham, creating an urban sprawl that will spoil the shape of this historic market town.

Changes to the Document: Take note of policy CP3 and alter policy CP7 to reduce the number of houses at the strategic location to 1,000 as specified in the West Sussex Structure Plan. Take particular note of the West Sussex Structure Plan Panel Report which stated *'It may be possible to accommodate greater numbers than 1000 but we are not recommending this. There is no need or justification at present and in any event further assessments would be required to test its feasibility.'* (West Sussex Structure Plan Panel Report - para 6.54).

Core Strategy Policy CP13

Policy CP13 states *‘The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development or suitable arrangements having been put in place for the improvement of the infrastructure, services and community facilities made necessary by the development.’*

The Panel Report on the adopted West Sussex Structure Plan stated that ‘We note that the sewage works is at capacity ...EA points out that improvements are proposed in the period 2005-10. This would relate well to the possible timing of development here given other requirements.’(West Sussex Structure Plan Panel Report - para 6.38).

Changes to the Document: The Sustainability Appraisal was carried out on the basis of 1,000 houses at the strategic location west of Horsham. The West Sussex Structure Plan Panel Report says that improvements to the sewage works were proposed for 2005 –10. However the West Sussex Structure Plan is based on 1,000 houses at the strategic location west of Horsham. Horsham District Council are proposing 2,000 houses at the strategic location west of Horsham, thus the Sustainability Appraisal relating to sewage capacity might be flawed. The Sustainability Appraisal should be done again for 2,000 houses at the strategic location west of Horsham, and there should be a re-consultation on the submission stage documents.

Test of Soundness

4. It is NOT 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.

Policy CP7

Policy CP7 states that *'Development will be programmed in order to enable the completion of 2,000 homes and other uses within the defined area by 2018.'*

The Panel Report on the adopted West Sussex Structure Plan stated that *'It may be possible to accommodate greater numbers than 1000 but we are not recommending this. There is no need or justification at present and in any event further assessments would be required to test its feasibility.'* (West Sussex Structure Plan Panel Report - para 6.54). The adopted West Sussex Structure Plan is the latest expression of the regional spatial strategy, and it calls for 1,000 houses at the strategic location west of Horsham, not 2,000 homes as identified in CP7, thus this Council strongly OBJECTS to this policy.

Changes to the Document: Alter policy CP7 to follow the latest expression of the regional spatial strategy, the West Sussex Structure Plan and plan for 1,000 houses at the strategic location west of Horsham.

Core Strategy Policy CP7

Policy CP7 states that *'the impact of the new development on the existing transport network should be minimised'*.

The Council OBJECTS to the road network as the development should not go ahead until the improvements to the A24 Warnham to Capel are complete, as per the Panel Report on the adopted West Sussex Structure Plan *'One constraint on [the development] is the timing of improvements to the single carriageway A24 between Warnham and Capel. ... There is general acceptance that strategic scale development at Horsham should not proceed until this is complete ...'* (West Sussex Structure Plan Panel Report - para 6.56)

Changes to the Document: Horsham District Council should be aware of central government policy on major road improvements and take note of the priority allocated to the Warnham to Capel A24 improvements by the Regional Transport Board. The A24 was given a priority of 4 out of 9 by the Regional Transport Board (para 9.2, minutes of 07 October 2005), with priorities 1 and 2 to be completed before 2010. The Regional Transport Board stated *'It was recommended that all identified priority 1 and 2 items should be included in the forward programme to 2010/11. However, from 2010/11 there would be a need to think about priorities. In doing so there is a need to work through sub regional strategies and their infrastructure requirements. The recommendation is that a forward working programme is agreed for 2010/11 as a starting point to feed into the debate.'*

Test of Soundness

5. It does NOT have regard to the authority's community strategy.

Community Strategy for Horsham District Page 20

The Community Strategy for Horsham District states '*Promote improvements to the network of footpaths, cycle routes and rights of way in general.*'

This COUNCIL STRONGLY SUPPORTS the promotion of improvements to the network of footpaths, cycle routes and rights of way.

Changes to the Document: The proposed road network for the strategic location west of Horsham should include the completion of the link from the Downs Link at Slinfold to Christ's Hospital in the south east and Horsham in north east for the safe passage of pedestrians, cyclists and equestrians. The road network should take into account the continuing need for access from Baystone Bridge to the Horsham cycle network at Tesco.

Community Strategy for Horsham District Page 22

The Community Strategy for Horsham District states '*Promote sustainable construction, refurbishment and maintenance of building and reduce green land take.*'

This Council OBJECTS to the development of 2,000 houses at Broadbridge Heath as this is in direct contravention of the Community Strategy which promotes the reduction of green land take.

Changes to the Document: Reduce the number of houses at the strategic location west of Horsham to 1,000 as stated in the latest expression of the Regional Spatial Strategy, the West Sussex Structure Plan, so that less green land is taken.

Test of Soundness

7. The strategies/policies/allocations do NOT represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.

Core Strategy - The Local Transport Plan for West Sussex Page 13

The Local Transport Plan for West Sussex states *'It is also acknowledged that much of the traffic travelling east and west through Horsham on the A264, A281 and the B2139 through Storrington is avoiding the traffic congestion on the A27 at Arundel. The Highways Agency is carrying out further investigation to find an environmentally acceptable way of providing a bypass around Arundel. It will report to the Secretary of State when this work is complete.'*

This Council argues that, given it has been suggested that traffic travelling east and west through Horsham is avoiding the traffic congestion on the A27 at Arundel, a new road network cannot be designed when the report from the Secretary of State on the A27 bypass has not been published.

Changes to the Document: Horsham District Council should wait until the evidence is available from the Secretary of State on the A27 bypass before designing the new road network.

Core Strategy Page 27 Bullet Point 4.7

This point states that *'Whilst much of the development appropriate to meet local needs can be identified in advance and the strategy assumes that this will be the case, it is considered appropriate for the strategy to incorporate some flexibility to respond to changing local circumstances, including where the opportunity arises to achieve substantial environmental enhancement. The potential for an improved interchange at Pulborough Station with redevelopment of land in the vicinity is one possible such case.'*

This Council asks why further work has not been done to research dispersal of the extra 1,000 houses allocated for the strategic location west of Horsham throughout the larger villages of the District. In particular, there seems to have been a missed opportunity at Billingshurst, Pulborough and Southwater.

Changes to the Document: Horsham District Council should investigate thoroughly the possibility of dispersing the extra 1,000 houses allocated for the strategic location west of Horsham throughout the larger villages of this District. Slinfold Parish Council is extremely disappointed that Horsham District Council did not do more work at the appropriate time to highlight the potential for a new town in the A23 corridor with its good transport links and potential to help boost the coastal economy.

Core Strategy Page 44 Bullet Point 4.43

This point states that *‘It should also be clear that it is not anticipated that the long term boundaries to development in this area as indicated (the railway line south-west of Horsham and the River Arun and its floodplain south of Broadbridge Heath) will be breached. Similarly, it is considered that the existing A281 and A264 roads provide a firm boundary to development to the west of Broadbridge Heath..’*

This Council STRONGLY SUPPORTS this point.

Core Strategy Page 52 Bullet Point 4.42

This point states that the re-development of the Rookwood Golf Course as an alternative is not considered appropriate on the basis of the Background Paper *‘Land West of Horsham: Strategic Development’*.

This Council OBJECTS to the exclusion of Rookwood Golf Course, as they consider there has not been a rigorous comparison of this land versus that proposed at Broadbridge Heath.

Changes to the Document: Horsham District Council should undertake an in-depth study of the two locations to make a clear comparison.

Core Strategy Page 52, Bullet Point 4.42

Bullet point 4.42 states *‘The potential role of further development at Billingshurst and Southwater has been examined but it has been concluded that they should not be considered as strategic locations for development at this stage, given the opportunities which exist for a sustainable ‘urban extension’ at the main town of Horsham’.*

The Council OBJECTS to the exclusion of Billingshurst and Southwater, especially since Southwater has a £20 million plus new village centre being opened this month.

Changes to the Document: Horsham District Council should examine the potential to disperse the additional 1,000 houses allocated for the strategic location west of Horsham amongst the larger villages in the District.

Core Strategy Policy CP12

Policy CP12 states *‘Development should provide a mix of housing sizes, types and tenures to meet the needs of the District’s communities.’*

This Council OBJECTS to the development of 2,000 houses at the strategic location at the west of Horsham because there is no evidence that these houses are required to meet the needs of the District. Only a few of the parishes of the Horsham District have conducted Housing Needs surveys.

Changes to the Document: Horsham District Council should provide evidence in the form of a Housing Needs Survey to substantiate the need for 2,000 houses at this specific location. This Council suggests that Horsham District Council might better meet the District’s housing needs if it investigated the Housing Needs Surveys carried out in some of the parishes in the Horsham District and dispersed the additional 1,000

houses that it has designated for the west of Horsham, throughout the larger villages of the District.

Core Strategy Policy CP13

Policy CP13 states *‘The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development or suitable arrangements having been put in place for the improvement of the infrastructure, services and community facilities made necessary by the development.’*

The Panel Report on the adopted West Sussex Structure Plan stated that ‘We note that the sewage works is at capacity ...EA points out that improvements are proposed in the period 2005-10. This would relate well to the possible timing of development here given other requirements.’(West Sussex Structure Plan Panel Report - para 6.38)

Changes to the Document: Horsham District Council should provide evidence that the proposed improvements to the sewage works, as discussed in the Panel Report of the West Sussex Structure Plan will extend to serve the 2,000 houses now proposed, rather than the 1,000 houses proposed in the adopted West Sussex Structure Plan, the latest expression of the Regional Spatial Strategy.

Test of Soundness

9. The plan is NOT necessarily flexible to enable it to deal with changing circumstances.

Core Strategy - The Local Transport Plan for West Sussex Page 13

The Local Transport Plan for West Sussex states *'It is also acknowledged that much of the traffic travelling east and west through Horsham on the A264, A281 and the B2139 through Storrington is avoiding the traffic congestion on the A27 at Arundel. The Highways Agency is carrying out further investigation to find an environmentally acceptable way of providing a bypass around Arundel. It will report to the Secretary of State when this work is complete.'*

This Council OBJECTS that the new road network has already been designed, yet the report from the Secretary of State on the A27 bypass has not been published. Given that it has been suggested that traffic travelling east and west through Horsham is avoiding the traffic congestion on the A27 at Arundel, the implications of the report on the A27 bypass might have a profound effect on the road network to the west of Horsham.

Changes to the Document: Horsham District Council should wait until the evidence is available from the Secretary of State on the A27 bypass before designing the new road network.

Core Strategy Page 27 Bullet Point 4.10

This point states that *'It is recognised that, in some cases, such as in relation to acute healthcare provision, the responsibility and basis for action lies beyond the direct influence of this strategy; however, in other cases, such as with regard to education, we can facilitate provision and follow up opportunities which arise to meet needs. The strategy is not based on working in isolation but rather drawing together partners and facilitating joined up working.'*

This Council STRONGLY OBJECTS to the development of 2,000 houses at the strategic location west of Horsham, as acute healthcare facilities are currently poor for this area. The nearest acute healthcare facility is based at the East Surrey Hospital, a 40 minute ambulance journey away. This hospital has no stars, is at operating capacity and is well known for extensive delays. Whilst Slinfold Parish Council accepts that this is not within the control of Horsham District Council, this is hardly a good example of joined up working.

Changes to the Document: The development at the strategic location west of Horsham should not be implemented until the capital funding for a new acute healthcare facility at Pease Pottage has been secured as referred to in The Bagnall Report of 2002. This recommended a 776- bed hospital at Pease Pottage.

Core Strategy Page 27 Bullet Point 4.10

This point states that 'It is recognised that, in some cases, such as in relation to acute healthcare provision, the responsibility and basis for action lies beyond the direct influence of this strategy; however, in other cases, such as with regard to education, we can facilitate provision and follow up opportunities which arise to meet needs. The strategy is not based on working in isolation but rather drawing together partners and facilitating joined up working.'

This Council OBJECTS to this 'wait and see' approach to education. Horsham District Council has already missed the opportunity to build a new secondary school at Southwater, as included in the Preferred Options Stage, and disperse the additional 1,000 houses above the Structure Plan requirements through the larger villages in the District. Horsham District Council had a real opportunity to master plan the future development at Southwater with the opening this month of the new village centre. Southwater already has a new health centre; a new secondary school and additional development could have been master planned for this very large village on the southern outskirts of Horsham, separated from Horsham by a strategic gap.

Changes to the Document: Horsham District Council should examine the potential to disperse the additional 1,000 houses allocated for the strategic location west of Horsham amongst the larger villages in the District.

Core Strategy Policy CP2

This policy states that '...careful appraisal of development proposals to ensure that they provide for enhancement by...having no adverse effects on water quality, reduce water consumption and minimise flooding'.

The Council OBJECTS to the development of 2,000 houses at the strategic location west of Horsham as the larger scale of development makes the area for development less flexible and the greater likelihood of houses being built close to the floodplain. The 1,000 houses identified in the West Sussex Structure Plan could be accommodated more easily to avoid putting pressure on the floodplain. This area is already very prone to flooding, a considerable problem in the parish of Slinfold. This Council suggests that building 2,000 houses so close to the floodplain is a high risk and may make these properties unsaleable if insurers and mortgage companies identify them as a high risk.

Changes to the Document: Reduce the number of houses at this strategic location to 1,000 as stated in the latest expression of the Regional Spatial Strategy, the West Sussex Structure Plan, so that development can be located as far away as possible from the floodplain. Horsham District Council should consult extensively with the Environment Agency on the floodplain and potential flood risk, in line with draft Planning Policy Statement 25.

Core Strategy Policy CP7

Policy CP7 states that *'Development will be programmed in order to enable the completion of 2,000 homes and other uses within the defined area by 2018.'*

This Council OBJECTS to the strategic location west of Horsham. The location is too rigid to cope with the unknown timescale for the improvements to the A24 Warnham to Capel, as the development should not proceed before the improvements have taken place. (West Sussex Structure Plan Panel Report - para 6.56)

Changes to the Document: Horsham District Council should be aware of central government policy on major road improvements and take note of the priority allocated to the Warnham to Capel A24 improvements by the Regional Transport Board. The A24 was given a priority of 4 out of 9 by the Regional Transport Board (para 9.2, minutes of 07 October 2005), with priorities 1 and 2 to be completed before 2010. The Regional Transport Board stated *'It was recommended that all identified priority 1 and 2 items should be included in the forward programme to 2010/11. However, from 2010/11 there would be a need to think about priorities. In doing so there is a need to work through sub regional strategies and their infrastructure requirements. The recommendation is that a forward working programme is agreed for 2010/11 as a starting point to feed into the debate.'*

Core Strategy Policy CP10

Policy CP10 states that *'Provision is made for the development of some 15,000 square metres of employment floorspace within the period 2001-2018.'*

This Council OBJECTS to this policy as it is far too vague. The proposed development of 2,000 houses to the west of Horsham will create a large dormitory village, heavily reliant on Crawley and Gatwick for employment, and adding to the already congested Horsham to Crawley/Gatwick commuter traffic. This Council feels that whilst Horsham District Council have spent time on allocating 2,000 houses to the west of Horsham, they have neglected the very real need for local employment to cut down commuter traffic in this already congested area. This Council is also concerned that the policy takes no account of the potential risk of Horsham losing one of its major employers. Employment generated within the strategic location is likely to be in the service industry, and certainly not sufficiently recompensed to enable those employees to purchase even an affordable house in this property hotspot.

Changes to the Document: Horsham District Council should concur with the allocation of 1,000 houses as stated in the latest expression of the Regional Spatial Strategy, the West Sussex Structure Plan, and concentrate on ensuring that sufficient employment space is generated to support the strategic location, and thus reduce the need for residents to commute elsewhere to work.