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SUPPORTING STATEMENT FOR MATTER 5

Strategic Location West of Horsham (Policy CP7)

Guidance for reading this statement:

Each bullet point answer corresponds to the following questions given as guidance in the 'Notes of the Pre-Examination Meeting':

- a. What part of the DPD is unsound?
- b. Which test(s), set out in paragraphs 4.23 and 4.24 of PPS12, does it fail?
- c. Why does it fail?
- d. How can the DPD be made sound?
- e. What is the precise change/wording that you are seeking?

1.0 Whether it should be allocated as an Area of Study for a Strategic Development Location.

1.1 Ref: HDC/Matter 5 – CP7

- a. CP7 states that 'Development within the area west of Horshambe defined further in a comprehensive masterplan (Development Brief) for the development.'
- b. 4.
- c. Creating Local Development Frameworks states in para 3.4 that '*Specific land allocations should not be set out in the core strategy. Instead, the core strategy should set out the broad locations for land use, which can then be outlined in detail in site specific allocations in other development plan documents. It can also use criteria to identify locations and priorities for preparing area action plans.*' Additionally, PPS12 states in para 2.10, 'The Core Strategy.....It should set out broad locations for delivering the housing and other strategic development needs such as employment, retail, leisure, community, essential public services and transport development' and in para 2.12, 'The core strategy should contain clear and concise policies for delivering the strategy which will apply to the whole of the local planning authority's area or to locations within it, but should not identify individual sites.'
- d. It is our view that it cannot be made sound.
- e. PPS12 advises in para 2.12 that '*These should be dealt with under site specific allocations development plan documents or area action development plan documents.*' Thus, west of Horsham should be dealt with in Site Specific Allocations of Land DPD and resulting Area Action Plan.

2.0 Whether an Area Action Plan should be programmed.

2.1 Ref: HDC/Matter 5 – CP7

- a. CP7 states that ‘Development within the area west of Horshambe defined further in a comprehensive masterplan (Development Brief) for the development.’
- b. 7
- c. HDC’s Position Statement for Matter 5 states in para 3.2 that ‘*There is no possibility that within this area a significant part can be excluded entirely from accommodating development as part of a comprehensive development scheme...*’ This Council argues that constraints mentioned in items 3.2 and 4.2 of this report will exclude areas of land for development.
- d. It is our view that the document cannot be made sound.
- e. The strategic location should be removed from the Core Strategy and dealt with separately in the Site Specific Allocations of Land, enabling allocation of land west of Horsham as an Area of Study for a Strategic Development Location and thus further consultation via an Area Action Plan.

3.0 The extent of the identified Area.

3.1 Ref: HDC/Matter 5 - Core Strategy Page 52 Bullet Point 4.42

- a. 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*’.
- b. 7.
- c. There has not been a rigorous comparison of this land versus that proposed at Broadbridge Heath, and PPS12 states in para 4.2 that ‘*The preparation process should include consideration of all the alternative options derived from the development of the evidence base...*’
- d. It is our view that it cannot be made sound.
- e. HDC should undertake a Sustainability Appraisal for both locations to enable a clear comparison to be made.

3.2 Ref: HDC/ Matter 5 - CP7

- a. 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.*’
- b. 3.
- c. 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 in para 6.39 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*’ .
- d. This policy can be made sound by reducing the number of houses allocated to west of Horsham to 1,000 to be easier to plan around the sewage and floodplain constraints.

- e. Reduce the number of houses proposed for land west of Horsham to 1,000, in policies CP4 part v & CP7.

4.0 The numbers of proposed dwellings within the identified Area.

4.1 Ref: HDC/Matter 5 - CP7

- a. 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.'*
- b. 4.
- c. The Panel Report on the adopted West Sussex Structure Plan in para 6.54 stated that *'It may be possible to accommodate greater numbers than 1,000 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.'* It is noted that bullet point A4.3.4 of HDC's Position Statement for matter 2, now suggests that the developers predict that 2,300 dwellings can be provided within the plan period.
- d. It is our view that it cannot be made sound.
- e. HDC should reduce the number of houses proposed for land west of Horsham to 1,000, in policies CP4 part v & CP7.

4.2 Ref: HDC/ Matter 5 - CP7

- a. 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.'*
- b. 3.
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- d. This policy can be made sound by reducing the number of houses allocated to west of Horsham to 1,000 to be easier to plan around the sewage and floodplain constraints.
- e. Reduce the number of houses proposed for land west of Horsham to 1,000, in policies CP4 part v & CP7.

5.0 Infrastructure provision, including health, schools, water and sewerage treatment.

5.1 Ref: HDC/Matter 5 - Core Strategy Page 27 Bullet Point 4.10

- a. 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...'*
- b. 9.
- c. 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. The discussion paper, 'Creating an NHS Fit for Future' seeks to further downgrade acute facilities at Chichester and Worthing, adding further stress to the workload at East Surrey Hospital.
- d. It is our view that it cannot be made sound.
- e. 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.

5.2 Ref: HDC/Matter 5 - Core Strategy Page 27 Bullet Point 4.10

- a. This point states that *'... 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.'*
- b. 9.
- c. This Council OBJECTS to this 'wait and see' approach to education. HDC 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. HDC had a real opportunity to master plan the future development at Southwater with the recent opening 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.
- d. It is our view that it cannot be made sound.
- e. Provision for secondary education must be made in the Core Strategy to meet the demand from the strategic location west of Horsham.

5.3 Ref: HDC/Matter 5 - CP13

- a. 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.’*
- b. 3 & 7.
- c. The Panel Report on the adopted West Sussex Structure Plan stated in para 6.38 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.’*
- d. The West Sussex Structure Plan Panel Report says that improvements to the sewage works are proposed for 2005 –10. However the West Sussex Structure Plan is based on 1,000 houses at the strategic location west of Horsham, not 2,000 as HDC are proposing. Thus the Sustainability Appraisal relating to sewage capacity is flawed and cannot in our view be made sound.
- e. HDC should either provide evidence in the form of a Sustainability Appraisal for 2,000 houses on land west of Horsham 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 or reduce the number of houses proposed for land west of Horsham to 1,000, in policy CP4 part v & CP7.

6.0 Flood risk, due to the River Arun and other rivers and streams.

6.1 Ref: HDC/Matter 5 - CP2

- a. 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’.*
- b. 3 & 9.
- c. The 1,000 houses identified in the West Sussex Structure Plan could be accommodated more easily than the 2,000 houses suggested in the submissions stage to avoid putting pressure on the floodplain.
- d. It is our view that it cannot be made sound.
- e. HDC should either abandon the submissions stage Core Strategy Sustainability Appraisal document and re-consult from the Issues and Options stage on 2,000 houses to enable extensive consultation with the Environment Agency on the floodplain and potential flood risk, in line with draft Planning Policy Statement 25 or reduce the number of houses proposed for land west of Horsham to 1,000, in policy CP4 part v & CP7.

7.0 The need for employment allocations.

7.1 Ref: HDC/Matter 5 - CP10

- a. Policy CP10 states that *‘Provision is made for the development of some 15,000 square metres of employment floorspace within the period 2001-2018.’*
- b. 9.
- c. 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 urban extension of Horsham, heavily reliant on Crawley and Gatwick for employment, and adding to the already congested Horsham to Crawley/Gatwick commuter traffic. Para 9.17 of the Sustainability Appraisal says that *‘Development around Horsham was generally considered positive in terms of the economy as it will contribute towards providing a larger skill base, although there may be negative aspects in terms of ensuring that sufficient employment opportunities are available.’* Thus HDC have recognised that providing sufficient employment opportunities may be a problem, yet they seem to have failed to plan properly for such provision and the policy takes no account of the potential risk of Horsham losing one of its major employers.
- d. It is our view that it cannot be made sound.
- e. HDC should reduce the number of houses proposed for land west of Horsham to 1,000, in policy CP4 part v & CP7 and ensure that sufficient employment space is generated to support the strategic location.

8.0 Impact on the highway network, including on the A264, M23 and the A24 (new junction and other improvements).

8.1 Ref: HDC/Matter 5 - Core Strategy - The Local Transport Plan for West Sussex Page 13

- a. 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.'*
- b. 7 & 9.
- c. 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.
- d. It is our view that it cannot be made sound.
- e. HDC should re-consult on the submission stage Core Strategy, once the Secretary for State has published the report on the A27 bypass.

8.2 Ref: HDC/Matter 5 - CP7

- a. Policy CP7 states that *'the impact of the new development on the existing transport network should be minimised.'*
- b. 3 & 4.
- c. The Panel Report on the adopted West Sussex Structure Plan states in para 6.56 *'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 ...'* Rt. Hon. Douglas Alexander MP, Secretary of State for Transport, wrote to the Leader of SEERA on 06 July 2006 and confirmed that the A24 Horsham to Capel improvement scheme will not be funded in the first five years of the Regional Funding Allocations.
- d. Until the A24 improvement is confirmed, the Core Strategy and Sustainability Appraisal cannot be made sound.
- e. HDC should re-consult on the submission stage Core Strategy and Sustainability Appraisal, once central government has confirmed the timescale for improvements to the A24.

9.0 The need for a park and ride facility.**9.1 Ref: HDC/Matter 5 - Page 51, bullet 4.41**

- a. Bullet 4.41 states '*enabling the opportunity for a new park and ride Facility*'
- b. 2.
- c. 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. Para 4.6.8 states that '*the cost of running a Park and Ride Service may outweigh the benefits of reduction in congestion in the town centre.*'
- d. Removal of the Park and Ride facility for land west of Horsham.
- e. Removal of the Park and Ride facility for land west of Horsham from policy CP7.

10.0 The need for facilities for Horsham Football Club

10.1 Ref: HDC/Matter 5 - Page 51, bullet 4.41

- a. 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*'.
- b. 2.
- c. The Preferred Options stage had Horsham Football Club on the eastern side of Horsham. Guidance from the Planning Inspectorate entitled, 'Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents' on page 31, bullet 2.4.5 states that raising issues at the submissions stage which have not been raised previously at the issues and options or at the preferred options stage may present problems for the Inspector. This Council therefore feels it has been denied its right to properly oppose the proposal to site Horsham Football Club on land west of Horsham, as we are effectively precluded from making any comments that we have not made at the issues and options or preferred options stage. The guide also states that the Inspector may decide to give limited consideration to proposals that have not been subject to proper procedures of community involvement. The failure by HDC to specify the possible siting of Horsham Football Club on land west of Horsham in the issues and options and preferred options stages makes the community involvement procedures for the Core Strategy deeply flawed.
- d. Removal of the proposal for the Horsham Football Club at land west of Horsham.
- e. Removal of the proposal for the Horsham Football Club at land west of Horsham from policy CP7.

11.0 The adequacy of the Sustainability Appraisal.

Please refer to items 3.2, 5.3, 6.1 and 8.2.

12.0 Public consultation.

Please refer to item 10.1.