

**HORSHAM DISTRICT COUNCIL (HDC)
HORSHAM DISTRICT PLANNING FRAMEWORK PREFERRED STRATEGY
PUTTING THE ECONOMY FIRST AUGUST 2013**

PUBLIC CONSULTATION 16 AUGUST TO 11 OCTOBER 2013

CPRE Sussex – Horsham District commented on the parts of the 'Horsham District Planning Framework (HDPF) Preferred Strategy Putting the economy first, listed in the table below. Submission was made via Horsham District Council's 'consultation portal'.

Foreword		Objection
Chapter 1: Introduction	Paras 1.1, 1.2, 1.3, 1.4	Objection
Chapter 3: Vision	Objectives para 3.11	Objection
Chapter 4: Policies for Growth & Change	Draft Policy 2: f re use of previously developed land	Objection
	Draft Policy 2:j re 'Green Infrastructure'	Objection
	Draft policy 2: l re 'delivery of the strategy and associated infrastructure'.	Objection
	Draft Policy 3 re 'Development Hierarchy'	Objection
Chapter 5: Economic Development	Economic Growth paragraph 5.9	Objection
	Draft Policy 6a 'Land North of Horsham'	Objections
Chapter 6: Housing	'demand for housing' para 6.1	Objection
	Draft Policy 13 provision for 'the development of 11,500 homes and infrastructure'	Objection
	Draft Policy 13: 'East of Billingshurst'	Objection
	Draft Policy 13: 'West of Southwater'	Objection
	Draft Policy 14 'North of Horsham'	Objection
	Draft Policy 15 provision of 'affordable homes'	
Chapter 8: Preserving the Environment and Character of the District	Page 59 'issues' identified that would need to be addressed'.	Objection
	High Quality Environment': para 8.1	Objection
	'Landscape': paragraph 8.4	Objection
	'Biodiversity' para 8.7	Objection
	Draft Policy 23 'The Natural Environment and District Character'	Objection
	'Countryside Protection': paras 8.15, 8.16:	Objection
	Draft Policy 32: Biodiversity	Objection
Chapter 9: Climate Change	Draft Policy 37, paras 3 and 4 re SUDS	Objection
Chapter 10: Infrastructure and Transport	Draft Policy 38: Infrastructure	Objection
Chapter 11: Healthy Communities	Draft Policy 41 re 'provision of new or improved community facilities or services'	Objection

Our comments, concerns and objections are given below.

‘FOREWORD’

CPRE Sussex – Horsham District considers that the Horsham District Planning Framework (HDPF) Preferred Strategy Putting the economy first (hereafter referred to as the HDPF Preferred Strategy) is NOT sustainable for the reasons summarised below.

1. CPRE Sussex – Horsham District refutes HDC’s key presumption, which is that a pre-determined level of economic growth and job creation can be engineered and attained by building a specific number of houses. Tellingly, neither HDC nor the property consultants that have advised HDC have provided evidence to substantiate their extraordinary presumption and neither is their presumption substantiated by the Employment Land Review, which also informs the HDPF Preferred Strategy.

1.2. It is delusional to presume as does HDC and its consultants that the economy will grow unabated at a pre-determined rate over the period to 2031.

1.3. As is recognised, demonstrated and clearly stated by the Office for Budget Responsibility (OBR) in its ‘Economic and fiscal outlook’ (March 2013) “There is considerable uncertainty around any economic forecast”.

1.4. That economic forecasting is most certainly not an exact science and economic forecasters are not infallible is made clear by the OBR, in its ‘Forecast evaluation report’ (October 2012) where it advises that “Following the Coalition’s first Budget in June 2010 we forecast that the recovery would be slower than its predecessors, but nowhere near as slow as it has been. We forecast that GDP would rise by 5.7 per cent from the first quarter of 2010 to the second quarter of 2012, but the latest data suggest it has grown by only 0.9 per cent”.

1.5. Justifiable uncertainty about future economic growth is NOT recognised either in the various GL Hearn Studies or in the Employment Land Review that informs and underpins HDC’s proposed house-building target and presumptions about future economic growth.

1.6. That the prolonged recession was not foreseen by the architects of the South East Plan should be a salutary lesson for Horsham District Council, central Government and its ministers.

1.7. We consider that the huge and unprecedented number of houses, which HDC is seeking to have built and the consequent substantial increase in the District’s population, cannot be accommodated sustainably.

1.8. This essential fact was acknowledged by Horsham District Council, 7 June 2006, C0/24 The South East Plan – draft Plan for Submission to Government: Resolved (i) (a) *“the level of housing development proposed in Horsham District over the period to 2026 (Policy H1) is high and at the upper limit of what can sustainably be accommodated”* .. *‘Indeed, the Council has severe reservations about what is now proposed and the implications for the future of the Development’*.

1.9. This concern is restated in the Draft SE Plan Panel Report: August 2007:

para 24.58 *“The Council regards this level as very demanding for environmental and infrastructure reasons and it argues that any higher level would be likely to have unacceptable environmental impacts and could not be realistically delivered within the Plan period”* – AND the huge target set for Horsham District by the South East Plan has not been achieved because it was EXCESSIVE and UNACHIEVABLE.

1.10. Please see our response to HDPF Preferred Strategy paragraph 5.9, 6.1 and Draft Policy 13.

2. HDC has reduced its requirement for affordable homes on sites providing 15 or more dwellings from 40% to 35% - and anticipates that it's intended 'mixed-use' development north of Horsham would provide only 20% to 30% affordable housing.

2.1. Please see our response to Draft Policy 15.

3. The HDPF Preferred Strategy neither identifies previously developed land/'brownfield' sites that have the potential to be developed and contribute to meeting Horsham district's housing needs nor sets as it should in compliance with NPPF Paragraph 17 a target for the use of 'brownfield' land.

3.1. Please see our response to Draft Policy 2.

4. The requirement for and cost of the essential infrastructure needed in consequence of HDC's preferred development strategy has yet to be determined and properly assessed and made public – as was made clear at the Council Meeting held 25 July 2013, when Councillors debated the draft Horsham District Planning Framework (HDPF) Preferred Strategy Consultation document.

4.1. Please see our response to Draft Policies 6, 14, 38 and 41.

5. The HDPF Preferred Strategy neither addresses nor recognises the need to provide either additional GPs or hospital facilities, including accident and emergency ambulance cover, for an substantially increased population.

5.1. Please see our response to Draft Policy 41.

6. The HDPF Preferred Strategy in the wording of draft policies relating to the natural environment, biodiversity, priority habitats and ecological networks does NOT comply fully with requirements and obligations placed on local planning authorities by the NPPF and the Acts and Regulations that inform and underpin the NPPF.

6.1. Please see our responses to HDPF Preferred Strategy paragraphs 2.5, 8.7, Draft Policies 23 and 32.

7. HDC should be mindful that as is explained in the Ministerial foreword to the NPPF: "Sustainable " means "ensuring that better lives for ourselves don't mean worse lives for future generations". Inadequate provision of essential infrastructure for an increasing population and failure to protect the District's countryside and natural environment will mean worse lives not only for future generations but also for communities in the present.

CHAPTER 1: INTRODUCTION

Paragraphs 1.1, 1.2, 1.3 and 1.4

CPRE Sussex – Horsham District considers that the Horsham District Planning Framework (HDPF) Preferred Strategy Putting the economy first (hereafter referred to as the HDPF Preferred Strategy) is NOT sustainable for the reasons summarised below.

1. CPRE Sussex – Horsham District refutes HDC's key presumption, which is that a pre-determined level of economic growth and job creation can be engineered and attained by building a specific number of houses. Tellingly, neither HDC nor the property consultants that have advised HDC have provided evidence to substantiate their extraordinary presumption and neither is their presumption substantiated by the Employment Land Review, which also informs the HDPF Preferred Strategy.

1.2. It is delusional to presume as does HDC and its consultants that the economy will grow unabated at a pre-determined rate over the period to 2031.

1.3. As is recognised, demonstrated and clearly stated by the Office for Budget Responsibility (OBR) in its 'Economic and fiscal outlook' (March 2013) "There is considerable uncertainty around any economic forecast".

1.4. That economic forecasting is most certainly not an exact science and economic forecasters are not infallible is made clear by the OBR, in its 'Forecast evaluation report' (October 2012) where it advises that "Following the Coalition's first Budget in June 2010 we forecast that the recovery would be slower than its predecessors, but nowhere near as slow as it has been. We forecast that GDP would rise by 5.7 per cent from the first quarter of 2010 to the second quarter of 2012, but the latest data suggest it has grown by only 0.9 per cent".

1.5. Justifiable uncertainty about future economic growth is NOT recognised either in the various GL Hearn Studies or in the Employment Land Review that informs and underpins HDC's proposed house-building target and presumptions about future economic growth.

1.6. That the prolonged recession was not foreseen by the architects of the South East Plan should be a salutary lesson for Horsham District Council, central Government and its ministers.

1.7. We consider that the huge and unprecedented number of houses, which HDC is seeking to have built and the consequent substantial increase in the District's population, cannot be accommodated sustainably.

1.8. This essential fact was acknowledged by Horsham District Council, 7 June 2006, C0/24 The South East Plan – draft Plan for Submission to Government: Resolved (i) (a) *"the level of housing development proposed in Horsham District over the period to 2026 (Policy H1) is high and at the upper limit of what can sustainably be accommodated"* .. *'Indeed, the Council has severe reservations about what is now proposed and the implications for the future of the Development'*.

1.9. This concern is restated in the Draft SE Plan Panel Report: August 2007:

para 24.58 *“The Council regards this level as very demanding for environmental and infrastructure reasons and it argues that any higher level would be likely to have unacceptable environmental impacts and could not be realistically delivered within the Plan period”* – AND the huge target set for Horsham District by the South East Plan has not been achieved because it was EXCESSIVE and UNACHIEVABLE.

1.10. HDC’s proposed housing target of 575 houses per year, (11,500 in 20 year period to 2031), is 75 houses per year less than the 650 houses per year imposed by the South East Plan. We note, however, that in the period 2006-07 to 2011-12 the maximum number of houses built in any of the 12 month periods was 434, which is 75.5% of HDC’s proposed target. The average over the 6 years is 307.5 new houses, which is 53.5% of HDC’s proposed annual target of 575 new houses per year. (Source: Horsham District Council – Annual Monitoring Report 2011/12)

1.11. We note also that in 2011/12, which is the first year of the plan period to 2031, only 285 houses were built – 49.6% of HDC’s proposed build rate of 575 houses per year. (Source: Horsham District Council – Annual Monitoring Report 2011/12)

1.12. In light of past and present performance, we do not believe that the proposed average annual build of 575 houses per year over the 20 years to 2031 is either sustainable or achievable.

1.13. Please see our response to HDPF Preferred Strategy paragraph 5.9, 6.1 and Draft Policy 13.

2. HDC has reduced its requirement for affordable homes on sites providing 15 or more dwellings from 40% to 35% - and anticipates that it’s intended ‘mixed-use’ development north of Horsham would provide only 20% to 30% affordable housing.

2.1. Please see our response to Draft Policy 15.

3. The HDPF Preferred Strategy neither identifies previously developed land/‘brownfield’ sites that have the potential to be developed and contribute to meeting Horsham district’s housing needs nor sets as it should in compliance with NPPF Paragraph 17 a target for the use of ‘brownfield’ land.

3.1. Please see our response to Draft Policy 2.

4. The requirement for and cost of the essential infrastructure needed in consequence of HDC’s preferred development strategy has yet to be determined and properly assessed and made public – as was made clear at the Council Meeting held 25 July 2013, when Councillors debated the draft Horsham District Planning Framework (HDPF) Preferred Strategy Consultation document.

4.1. Please see our response to Draft Policies 6, 14, 38 and 41.

5. The HDPF Preferred Strategy neither addresses nor recognises the need to provide either additional GPs or hospital facilities, including accident and emergency ambulance cover, for an substantially increased population.

5.1. Please see our response to Draft Policy 41.

6. The HDPF Preferred Strategy in the wording of draft policies relating to the natural environment, biodiversity, priority habitats and ecological networks does NOT comply fully with requirements and obligations placed on local planning authorities by the NPPF and the Acts and Regulations that inform and underpin the NPPF.

6.1. Please see our responses to HDPF Preferred Strategy paragraphs 2.5, 8.7, Draft Policies 23 and 32.

7. HDC should be mindful that as is explained in the Ministerial foreword to the NPPF: “Sustainable “ means “ensuring that better lives for ourselves don’t mean worse lives for future generations”. Inadequate provision of essential infrastructure for an increasing population and failure to protect the District’s countryside and natural environment will mean worse lives not only for future generations but also for communities in the present.

CHAPTER 3: VISION

Spatial Objectives: paragraph 3.11

1. CPRE Sussex – Horsham District is very concerned that the ‘key objectives’ identified by HDC and listed in the HDPF Preferred Strategy do not recognise the intrinsic character and beauty of the countryside in Horsham District.

1.1. NPPF Paragraph 17 stipulates that planning should “recognise the intrinsic character and beauty of the countryside”.

1.2. HDC should be mindful that “Many people value our countryside for quiet enjoyment – be it walking, wildlife watching or cycling-for spiritual refreshment and well-being. Direct enjoyment of biodiversity is a major reason for these countryside visits: survey evidence suggests that birds and wildlife were the primary reason influencing the decision of 59% of visitors to the countryside” (A Biodiversity Strategy for England, DEFRA 2002)

1.3. We ask that that the NPPF requirement for planning to recognise “the intrinsic character and beauty of the countryside” be explicitly recognised by and written in to the HDPF Preferred Strategy’s key objectives. It could be incorporated in Objective 10, and recognised in HDC’s policies; likewise recognition of the value and benefits of the District’s countryside and biodiversity.

2. CPRE Sussex-Horsham District is very concerned that the importance of ‘biodiversity’, ecosystems services and the natural environment are not properly recognised by the HDPF Preferred Strategy’s key objectives. Reference to ‘biodiversity’ is made in Objective 10 where it is lumped together with air, soil, water quality and the risk of flooding - e.g. “minimise impacts on biodiversity” is woefully inadequate and falls far short of the requirements of the NPPF.

2.1. NPPF Paragraph 9 requires the planning system and therefore local plans not just to minimise impacts on biodiversity but also to provide net gains in biodiversity, in order to contribute to and enhance the natural and local environment. This requirement should be recognised and stated as a key objective.

2.2. Similarly, the requirement stipulated by NPPF Paragraph 117, that planning policies should “promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan”; should also be recognised and explicitly stated as a key objective.

2.3. We ask that this clearly expressed requirement of NPPF Paragraph 117 be included as a key objective.

3. CPRE Sussex-Horsham District is very concerned that the HDPF Preferred Strategy's key objectives neither recognises nor mentions the importance of ecosystems and the services they provide to society, contra The Natural Environment White Paper and NPPF Paragraphs 109,, 113,117 and 165.

3.1. The importance of ecosystems and the services they provide to society underpinned The Natural Environment White Paper (NEWP) and resulted in the government commitment:

“to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks with more and better places for nature for the benefit of wildlife and people” (Page 17 of NEWP).

3.2. The NPPF recognises the important role played by ecosystem services, which it defines as being “The benefits people obtain from ecosystems such as, food, water, flood and disease control and recreation”. NPPF Paragraph 109 stipulates that “The planning system should contribute to and enhance the natural and local environment by: “recognising the wider benefits of ecosystem services”. HDC should be mindful that:

“Economic and environmental performance must go hand in hand. The natural environment is central to economic activity and growth, providing the resources we need to produce goods and services, and absorbing and processing unwanted by-products in the form of pollution and waste”.

“Environmental assets contribute to managing risks to economic and social activity, helping to regulate flood risks, regulating the local climate (both air quality and temperature), and maintaining the supply of clean water and other resources. This underpins economic activity and wellbeing, and so maintaining the condition of natural assets is a key factor in sustaining growth for the longer term.” (Defra Evidence and Analysis Series Paper 2 Economic Growth and the Environment, 2010)

3.3. We ask that the HDPF Preferred Strategy's key objectives recognise explicitly the wider benefits of ecosystems services and the natural environment.

4. CPRE Sussex-Horsham District is very concerned that whilst the HDPF Preferred Strategy's key objectives include in the explanatory text for Objective 7 an aspiration to “to encourage the appropriate re-use of brownfield sites in sustainable locations”, the aspiration is not explicitly stated as a Spatial Objective, as it should be.

4.1. We ask that this be clearly stated as a key objective with the important caveat stipulated by NPPF Paragraph 17: “provided that it is not of high environmental value”; ‘it’ here refers to ‘previously developed land’/‘brown field land’.

CHAPTER 4: POLICIES FOR GROWTH AND CHANGE

Policies for Growth and Change:- Draft Policy 2

Draft Policy 2:f.: ‘use of previously developed land.

1. CPRE Sussex-Horsham District is concerned that although HDPF Preferred Strategy Draft Policy 2 includes the requirement to “Give priority to the use of previously developed land’ (Draft Policy 2:f), and Draft Policy 26 includes the requirement to “prioritise the use of previously developed land”, and this requirement is seemingly recognised at HDPF Preferred Strategy paragraph 3.17, the HDPF Preferred Strategy does not identify specific ‘brownfield’ sites for future development.

2.1. Moreover, whilst HDPF Preferred Strategy paragraph 3.17 states that “Within the context of the sustainable development principles, in providing for the necessary new development within the District the strategy is based on giving priority to locating new homes, jobs, facilities and services within Horsham town and where appropriate, the smaller towns and villages, particularly through the re-use of previously-developed land”, HDC’s actual preferred strategy is based almost entirely on the development of countryside – ‘greenfield’ land, NOT the re-use of previously developed land. HDC’s three preferred strategic sites, Billingshurst, North Horsham and Southwater are ‘greenfield’, not ‘brownfield’ sites.

3. Contrary to NPPF Paragraph 17, the HDPF Preferred Strategy does not set a locally appropriate target for the use of brownfield land.

3.1. Whilst HDPF Preferred Strategy’s Spatial Objectives include in the explanatory text for Spatial Objective 7 an aspiration “to encourage the appropriate re-use of brownfield sites in sustainable locations” that aspiration is not explicitly stated as a Spatial Objective.

4. We ask that the requirement “to encourage the appropriate re-use of brownfield sites in sustainable locations” with the addition of the essential caveat – “provided that it is not of high environmental value”, as stipulated by NPPF Paragraph 17, be stated as a Spatial Objective.

4.1. We also ask that HDC to set a target for the use of brownfield – in compliance with NPPF Paragraph 17, and identify and list brownfield sites that have the potential to be developed and contribute to meeting the District’s housing needs.

Draft policy 2: j. re ‘Green Infrastructure’.

5. CPRE Sussex-Horsham District is very concerned that:

- a. What constitutes ‘green infrastructure’ is neither explained nor defined in the HDPF Preferred Strategy and is omitted from that document’s glossary. We

ask that 'Green Infrastructure' be defined and its purpose and importance explained in the HDPF Preferred Strategy document.

b. The HDPF apparently conflates and confuses 'green infrastructure' with 'ecological networks', (which are not explicitly mentioned in the HDPF Preferred Strategy document), treating them as if they are one and the same, which as is made clear by the NPPF they are not.

5.1. The NPPF defines 'Green Infrastructure' as: "A network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities"

AND states that 'Ecological Networks' "link sites of biodiversity importance".

5.2. The importance of 'Ecological Networks' for biodiversity and the natural environment is explicitly emphasised by the NPPF '11 Conserving and enhancing the natural environment' Paragraphs 109, 113, 117 and 165.

a. NPPF Paragraph 109 stipulates that "The planning system should contribute to and enhance the natural and local environment by:
"minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent **ecological networks** that are more resilient to current and future pressures";

b. NPPF Paragraph 113. "Local planning authorities should set **criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged**. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and **the contribution that they make to wider ecological networks**".

c. NPPF Paragraph 117 stipulates that "To minimise impacts on biodiversity and geodiversity, planning policies should:

"•plan for biodiversity at a landscape-scale across local authority boundaries";
"•identify and map components of **the local ecological networks**, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;"

"•promote the preservation, restoration and re-creation of priority habitats, **ecological networks** and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan";

d. NPPF Paragraph 165 stipulates that "Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate,

this should include **an assessment of existing and potential components of ecological networks**. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors”.

5.3. In addition to the NPPF Paragraphs quoted above, we refer HDC to Article 10 of the Habitats Directive, which requires “Member States to endeavour to encourage the management of features of the landscape that are of major importance for wild flora and fauna. These features are those that, because of their linear and continuous structure or their function as stepping-stones, are essential for migration, dispersal and genetic exchange. Examples given in the Directive are rivers with their banks, traditional field boundary systems (such as hedgerows), ponds and small woods. Suitable planning conditions and obligations may serve to promote such management”.

5.4. Clearly, ‘ecological networks’ are of major importance for biodiversity, habitats and the natural environment. We are very concerned that HDC has conflated and confused ‘green infrastructure’ with ‘ecological networks’ and has not recognised the importance and vital function of ecological networks in its HDPF Preferred Strategy, Spatial objectives and policies.

5.5. We ask that the importance and vital function of ecological networks be properly recognised by HDC in its HDPF Preferred Strategy, Spatial Objectives and policies – and where appropriate the words ‘green infrastructure’ be replaced with the ‘ecological networks’. For example, as is made clear by the NPPF and Article 10 of the Habitats Directive, ecological networks are vital for the well being of biodiversity, habitats, ecology and the natural environment.

Draft Policy 2: I. ‘Monitor delivery of the Strategy and associated infrastructure’

6. CPRE Sussex-Horsham District is concerned that although HDPF Draft Policy 2.j. includes the requirement to “Monitor delivery of the Strategy and associated infrastructure in conjunction with partner organisations, developers and landowners”, no tangible outcome is specified. We ask that this ‘statement of intent’ be rewritten to read as follows: “Monitor delivery of the Strategy and associated infrastructure in conjunction with partner organisations, developers and landowners in order to ensure that appropriate infrastructure is provided in time to serve the development or the relevant phase of the development” in accordance with NPPF 177.

7. NPPF Paragraph 177 stipulates that “It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review”.

7.1. CPRE Sussex-Horsham District is very concerned that contrary to NPPF 177, the requirement for and cost of the essential infrastructure needed in consequence of HDC’s preferred development strategy has yet to be determined and properly assessed – and made public. That this essential work had not been completed was made clear at the

Council Meeting held 25 July 2013, when Councillors debated the draft Horsham District Planning Framework (HDPF) – Preferred Strategy Consultation document.

7.2.. This significant omission is surprising given that HDC has previously highlighted

Draft Policy 3: Development Hierarchy

1. CPRE Sussex – Horsham District considers that there is insufficient detail on what development is appropriate for each of the settlement types identified and listed in HDPF Preferred Strategy Draft Policy 3.

1.1. Draft Policy 3 is only for development WITHIN settlement boundaries; apparently there is no policy for edge-of-settlement development.

1.2. We suggest that the wording of HDPF Preferred Strategy Draft Policy 3 be changed so as to read:

“Development will be permitted within the settlements which have defined built-up areas. Any expansion, infilling and redevelopment within the built up area will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement accordance with the settlement hierarchy below. Adjoining the built up area of Horsham Town and the Larger Towns and Villages, development will also be required to demonstrate that it is of an appropriate nature and scale to maintain the characteristics and function of the existing settlement. For land adjoining the remaining settlements and for the rest of the district, development will only be permitted outside the built-up area boundary in the exceptional circumstances as defined by policies contained within the rest of the Plan. The limits of development may only be altered through community-led planning policy documents including neighbourhood plans or a subsequent development plan document which identifies specific sites for development”

CHAPTER 5: ECONOMIC DEVELOPMENT

Paragraph 5.9: ‘Economic Growth’

1. CPRE Sussex – Horsham District refutes HDC’s key presumption, which is that a pre-determined level of economic growth and job creation can be engineered and attained by building a specific number of houses. Tellingly, neither HDC nor the property consultants that have advised HDC have provided evidence to substantiate their extraordinary presumption and neither is their presumption substantiated by the Employment Land Review, which also informs the HDPF Preferred Strategy.

2. It is delusional to presume as does HDC and its consultants that the economy will grow unabated at a pre-determined rate over the period to 2031.

2.2. As is recognised, demonstrated and clearly stated by the Office for Budget Responsibility (OBR) in its ‘Economic and fiscal outlook’ (March 2013) “There is considerable uncertainty around any economic forecast”.

2.3. That economic forecasting is most certainly not an exact science and economic forecasters are not infallible is made clear by the OBR, in its 'Forecast evaluation report' (October 2012) where it advises that "Following the Coalition's first Budget in June 2010 we forecast that the recovery would be slower than its predecessors, but nowhere near as slow as it has been. We forecast that GDP would rise by 5.7 per cent from the first quarter of 2010 to the second quarter of 2012, but the latest data suggest it has grown by only 0.9 per cent".

3. Justifiable uncertainty about future economic growth is NOT recognised either in the various GL Hearn Studies or in the Employment Land Review that informs and underpins HDC's proposed house-building target and presumptions about future economic growth.

4. That the prolonged recession was not foreseen by the architects of the South East Plan should be a salutary lesson for Horsham District Council, central Government and its ministers.

5. We consider that the huge and unprecedented number of houses, which HDC is seeking to have built and the consequent substantial increase in the District's population, cannot be accommodated sustainably.

5.1. This essential fact was acknowledged by Horsham District Council, 7 June 2006, C0/24 The South East Plan – draft Plan for Submission to Government: Resolved (i) (a) *"the level of housing development proposed in Horsham District over the period to 2026 (Policy H1) is high and at the upper limit of what can sustainably be accommodated"* .. *"Indeed, the Council has severe reservations about what is now proposed and the implications for the future of the Development"*.

5.2. This concern is restated in the Draft SE Plan Panel Report: August 2007: para 24.58 *"The Council regards this level as very demanding for environmental and infrastructure reasons and it argues that any higher level would be likely to have unacceptable environmental impacts and could not be realistically delivered within the Plan period"* – AND the huge target set for Horsham District has not been achieved because it was EXCESSIVE and UNACHIEVABLE.

Draft Policy 6a: 'Allocating land for a high quality business park at Land North of Horsham'

1. Draft Policy 6a "Allocating land for a high quality business park at Land North of Horsham" is integral to HDC's concept and aspiration for a 'strategic mixed use development' on countryside north of Horsham (Draft Policy 14) – a concept that CPRE Sussex – Horsham District considers to be flawed and should be abandoned.

2. At the Council meeting held 25 July 2013, leading Councillors promoted the intended 'north of Horsham' development as the future growth engine for Horsham District, which it was explained would provide 'high quality well paid jobs' for Horsham's young people on their 'doorstep', and obviate the need for residents to work outside of the District. It was envisaged that 'young people' employed at the business park would reside in the adjoining residential development – even though the number of affordable homes expected from this development could be as low as 20%.

2.1. This concept is flawed because HDC can neither compel businesses to confine their recruitment to Horsham's 'young people', nor developers the sale of new houses to same. Added to which a new railway station 'north of Horsham', if sufficient funds could be found to pay for it, would facilitate commuting to London and other locations outside of the District. 'North of Horsham' would become another dormitory settlement, serving the needs of Gatwick/Crawley and London – not Horsham.

3. HDPF Preferred Strategy acknowledges at paragraph 5.72 that "The North West Sussex Employment Land Review indicates that there is sufficient provision of employment land in the District, but existing sites may need to evolve in the future in order to meet modern needs".

3.1. We note that the potential impacts of the intended business park on existing employment sites is not explained either in the HDPF Preferred Strategy or by the HDPF Interim Sustainability Appraisal. For example, would the creation of a business park north of Horsham result in redundancy of existing employment sites? These are fundamental issues that should be identified and addressed by the HDPF Preferred Strategy.

4. HDPF Preferred Strategy, paragraph 5.79 rightly acknowledges that "Transport access, and ease of movement is a key factor in the performance of the local economy, enabling residents to travel to their place of work, and also allow the movement of goods and services. One key transport characteristic for Horsham District is its high levels of car ownership and car use". The vast business park and residential development would have a huge and detrimental impact on the District's already congested road network, with resultant costs and a need for substantial funding.

5. HDC has previously indicated that this enormous strategic development would facilitate and enable a new hospital to be built. We note that the hospital has now been transmogrified to a 'medical centre', essentially to meet the needs of the development's residents rather than the wider community.

5.1. According to a report in the West Sussex County Times (26 Sep 13) the chief executive of Surrey and Sussex Healthcare NHS Trust that runs East Surrey Hospital told Horsham District Councillors that "There's a tremendous pressure on acute providers because of the way in which demography is changing" and "We have not prepared for the demographic changes that we are having to face. That's the problem".

5.2. Building 2500 new houses north of Horsham can only exacerbate the existing and worsening 'problem'.

6. Draft Policy 14 states that "alongside the business park a parkway station shall be provided that includes a park and ride type facility including sustainable transport links to Horsham town and Horsham train station". Presumably, the 'parkway station' is a 'train' station (railway station), in which case why would a 'transport link' be needed to 'Horsham train station'? Whether a railway station will be provided 'north of Horsham' seems to be in doubt as was made clear at the Council Meeting held 25 July 2013, when Councillors debated the draft Horsham District Planning Framework (HDPF) – Preferred Strategy Consultation document.

6.1. The HDPF Preferred Strategy omits to mention not only that there are railway stations at Faygate, Ifield and Littlehaven but that a large proportion of trains do not stop at them.

7. At this same meeting it was made clear that the level and cost of the infrastructure that would be required for the intended huge housing estate and extensive business park to be viable had yet to be assessed; likewise its impact on the local and wider road networks.

8. Information in public view and the debate by Councillors at the Council Meeting held 25 July 2013 seems to indicate that this 'proposed mixed-use development' would be, if permitted, speculative and a gamble by Horsham District Council because the supposed 'benefits for Horsham' appear to be possibilities, not certainties, notably:

- a. It may or may not attract wealth generating businesses into the District.
- b. it may or may not create a substantial number of new 'quality' jobs.
- c. It may or may not be provided with its own railway station.
- d. it may or may not be provided with new Secondary and Primary Schools.
- e. It may or may not provide 30% or significantly fewer affordable homes.

8.1. It would certainly create an enormous requirement for new infrastructure and expanded essential services with resultant costs and a need for substantial funding.

8.2. It would certainly have a huge and detrimental impact on the District's already congested road network, with resultant need for major upgrades with resultant costs and a need for substantial funding.

8.3. It would certainly result in the loss of around 800 acres of irreplaceable countryside, and productive farmland.

CHAPTER 6: HOUSING

Paragraph 6.1: 'demand for housing'

1. It is CPRE Sussex-Horsham District's position that the average annual build of 575 houses per year over the 20 year period to 2031 proposed by Horsham District Council (HDC), is excessive and is unlikely to be deliverable for the reasons explained below.

2. The South East Plan (SEP) targets were set before the prolonged economic down turn, which the architects of the SEP did not foresee.

2.2. The SEP set a target of for Horsham District of 13,000 new houses to be built over a twenty year period to 2026.

2.3. That target has not been met. This is because the SEP targets were set before the prolonged economic down turn, which the architects of the SEP did not foresee. The target set for Horsham District has proved to be excessive and unachievable.

2.4. This is true also for councils throughout South East England as is made clear by. DCLG data presented in Milton Keynes 'Response to Inspector's document ID/9 Updated Housing Technical Paper – Submission Document B126' April 2012, paragraphs 3.24 to 3.30.

3. HDC's proposed housing target of 575 houses per year, (11,500 in 20 year period to 2031), is 75 houses per year less than the 650 houses per year imposed by the South East Plan. We note, however, that in the period 2006-07 to 2011-12 the maximum number of houses built in any of the 12 month periods was 434, which is 75.5% of HDC's proposed target. The average over the 6 years is 307.5 new houses, which is 53.5% of HDC's proposed annual target of 575 new houses per year. (Source: Horsham District Council – Annual Monitoring Report 2011/12)

3.1. We note also that in 2011/12, which is the first year of the plan period to 2031, only 285 houses were built – 49.6% of HDC's proposed build rate of 575 houses per year. (Source: Horsham District Council – Annual Monitoring Report 2011/12)

3.2. In light of past and present performance, we do not believe that the proposed average annual build of 575 houses per year over the 20 years to 2031 is either sustainable or achievable.

4. We are concerned that should this high target be adopted and should it not be achieved the District would continue to be subject to opportunistic applications from developers to build on countryside in inappropriate locations in expectation that the justifiable concerns of communities would probably be overridden by the Planning Inspectorate.

Future unabated and enduring Economic Growth is not assured.

5. Although it would appear that the economy is showing signs of recovery some economists and politicians do not share the Chancellor's optimistic view that apparently positive economic data heralds a resumption of sustained and enduring strong economic growth. For example, The Institute of Economic Affairs (IEA), reports that the United Kingdom is experiencing its slowest recovery for 170 years, – and that the economy will 'flat line' for decades with GDP growing by just 1 per cent a year, compared to a trend rate since the 1980s of about 2.5% (IEA Discussion Paper No.47 'Will flat-lining become normal? An analysis of Britain's worst period of peacetime growth since the Industrial Revolution', September 2013).

5.1. We note also that a significant factor in the fall in the rate of unemployment, reported September 2013, is the creation of 25,000 estate agent jobs in the three months to June 2013. These new jobs are a direct result of the Government's controversial 'Help to Buy' scheme, which is intended as a short term measure. Moreover some commentators fear that this exceptional measure is a political artifice that encourages the assumption of high levels of personal debt (underwritten by the tax payer) and thereby risks a return to the debt-fuelled 'boom' conditions that gave rise to the subsequent prolonged economic downturn.

5.2. Rising electricity prices are a potential constraint on future economic growth. Commenting on the publication of the latest assessment by DECC of the impact of UK government climate change policies on energy prices, the Policy Director at EEF, the manufacturers' organisation, warned that "Policies are already adding 30% to business electricity prices, and this will rise to 50% by 2020 and 70% by 2030. Measures to shield the most energy intensive industries from a portion of the costs will make a difference but, unless we get a grip on spiralling policy costs, steeply rising electricity prices for the rest of the sector risk making the UK an increasingly unattractive location for industrial investment and undermining efforts to rebalance the economy (EEF comment on DECC analysis of UK climate change policies on energy costs 1 Sep 13).

5.3. Another constraint on economic growth is the marked reduction in the spending power of households. A report produced by ASDA with the Centre of Economics and Business Research (CEBR) found that "while economists believe we may well be at the beginning of what will be a long path to recovery, over the last five months the Income Tracker has steadily declined. Any green shoots have yet to translate into more money in people's pockets or greater consumer confidence until we see a more sustained improvement, we remain only cautiously optimistic" ('ASDA Income Tracker A Special Report An in-depth look at the real cost of the financial crisis: 2008-2018' Asda CEBR September 2013).

6. Justifiable uncertainty about future economic growth is not properly acknowledged either in the various GL Hearn Studies or in the Employment Land Review that informs and underpins Horsham District Council's proposed house-building target and presumptions about future economic growth.

6.1. The GL Hearn assessment of 'housing need' to 2031 is dependent on an interwoven mix of statistics, which are not infallible, and questionable and unverifiable assumptions and presumptions. Statistics and data sets should be the servants not the masters of decision makers. Unfortunately it would seem that statistics and data sets are the masters of strategic planners and Government Ministers.

7. CPRE Sussex – Horsham District refutes GL Hearn's and HDC's key presumption, which is that a pre-determined level of economic growth and job creation can be engineered and attained by building a specific number of houses. Tellingly, neither GL Hearn nor HDC have provided evidence to substantiate their extraordinary presumption and neither is the presumption substantiated by the Employment Land Review, which also informs the HDPF Preferred Strategy.

7.1. Furthermore, it is delusional to presume as does HDC and its consultants that the economy will grow unabated at a pre-determined rate over the period to 2031.

7.2. As is recognised, demonstrated and clearly stated by the Office for Budget Responsibility (OBR) in its 'Economic and fiscal outlook' (March 2013) "There is considerable uncertainty around any economic forecast".

7.3. In this report, too, the OBR advises that "The situation in the euro area also remains a major risk to our forecast, with the underlying situation still fragile and the completion of long-term structural and institutional reforms a long way off".

7.4. That economic forecasting is most certainly not an exact science and economic forecasters are not infallible is made clear by the OBR, in its 'Forecast evaluation report' (October 2012) where it advises that "Following the Coalition's first Budget in June 2010 we forecast that the recovery would be slower than its predecessors, but nowhere near as slow as it has been. We forecast that GDP would rise by 5.7 per cent from the first quarter of 2010 to the second quarter of 2012, but the latest data suggest it has grown by only 0.9 per cent".

8. That the current prolonged recession was not foreseen by the architects of the South East Plan should be a salutary lesson for Horsham District Council, central Government and its ministers. Unfortunately, lessons have not been learnt and communities in Horsham District are suffering the inequitable consequences as developers continue to submit opportunistic applications in anticipation that they will probably be permitted on Appeal by the Planning Inspectorate should HDC refuse them.

9. In conclusion, we do not believe that the proposed average annual build of 575 houses per year over 20 years is either sustainable or achievable over the 20 year period to 2031.

Draft Policy 13 'provision for 'the development of 11,500 homes and infrastructure''

1. It is CPRE Sussex-Horsham District's position that the average annual build of 575 houses per year over the 20 year period to 2031 proposed by Horsham District Council (HDC), is excessive and is unlikely to be deliverable for the reasons explained below.

2. The South East Plan (SEP) targets were set before the prolonged economic down turn, which the architects of the SEP did not foresee.

2.2. The SEP set a target of for Horsham District of 13,000 new houses to be built over a twenty year period to 2026.

2.3. That target has not been met. This is because the SEP targets were set before the prolonged economic down turn, which the architects of the SEP did not foresee. The target set for Horsham District has proved to be excessive and unachievable.

2.4. This is true also for councils throughout South East England as is made clear by DCLG data presented in Milton Keynes 'Response to Inspector's document ID/9 Updated Housing Technical Paper – Submission Document B126' April 2012, paragraphs 3.24 to 3.30.

3. HDC's proposed housing target of 575 houses per year, (11,500 in 20 year period to 2031), is 75 houses per year less than the 650 houses per year imposed by the South East Plan. We note, however, that in the period 2006-07 to 2011-12 the maximum number of houses built in any of the 12 month periods was 434, which is 75.5% of HDC's proposed target. The average over the 6 years is 307.5 new houses, which is 53.5% of HDC's proposed annual target of 575 new houses per year. (Source: Horsham District Council – Annual Monitoring Report 2011/12)

3.1. We note also that in 2011/12, which is the first year of the plan period to 2031, only 285 houses were built – 49.6% of HDC's proposed build rate of 575 houses per year. (Source: Horsham District Council – Annual Monitoring Report 2011/12)

3.2. In light of past and present performance, we do not believe that the proposed average annual build of 575 houses per year over the 20 years to 2031 is either sustainable or achievable.

4. We are concerned that should this high target be adopted and should it not be achieved the District would continue to be subject to opportunistic applications from developers to build on countryside in inappropriate locations in expectation that the justifiable concerns of communities would probably be overridden by the Planning Inspectorate.

Future unabated and enduring Economic Growth is not assured.

5. Although it would appear that the economy is showing signs of recovery some economists and politicians do not share the Chancellor's optimistic view that apparently positive economic data heralds a resumption of sustained and enduring strong economic growth. For example, The Institute of Economic Affairs (IEA), reports that the United Kingdom is experiencing its slowest recovery for 170 years, – and that the economy will 'flat line' for decades with GDP growing by just 1 per cent a year, compared to a trend rate since the 1980s of about 2.5% (IEA Discussion Paper No.47 'Will flat-lining become normal? An analysis of Britain's worst period of peacetime growth since the Industrial Revolution', September 2013).

5.1. We note also that a significant factor in the fall in the rate of unemployment, reported September 2013, is the creation of 25,000 estate agent jobs in the three months to June 2013. These new jobs are a direct result of the Government's controversial 'Help to Buy' scheme, which is intended as a short term measure. Moreover some commentators fear that this exceptional measure is a political artifice that encourages the assumption of high levels of personal debt (underwritten by the tax payer) and thereby risks a return to the debt-fuelled 'boom' conditions that gave rise to the subsequent prolonged economic downturn.

5.2. Rising electricity prices are a potential constraint on future economic growth. Commenting on the publication of the latest assessment by DECC of the impact of UK government climate change policies on energy prices, the Policy Director at EEF, the manufacturers' organisation, warned that "Policies are already adding 30% to business electricity prices, and this will rise to 50% by 2020 and 70% by 2030. Measures to shield the most energy intensive industries from a portion of the costs will make a difference but, unless we get a grip on spiralling policy costs, steeply rising electricity prices for the rest of the sector risk making the UK an increasingly unattractive location for industrial investment and undermining efforts to rebalance the economy" (EEF comment on DECC analysis of UK climate change policies on energy costs 1 Sep 13).

5.3. Another constraint on economic growth is the marked reduction in the spending power of households. A report produced by ASDA with the Centre of Economics and Business Research (CEBR) found that "while economists believe we may well be at the beginning of what will be a long path to recovery, over the last five months the Income Tracker has steadily declined. Any green shoots have yet to translate into more money

in people's pockets or greater consumer confidence until we see a more sustained improvement, we remain only cautiously optimistic" ('ASDA Income Tracker A Special Report An in-depth look at the real cost of the financial crisis: 2008-2018' Asda CEBR September 2013).

6. Justifiable uncertainty about future economic growth is not properly acknowledged either in the various GL Hearn Studies or in the Employment Land Review that informs and underpins Horsham District Council's proposed house-building target and presumptions about future economic growth.

6.1. The GL Hearn assessment of 'housing need' to 2031 is dependent on an interwoven mix of statistics, which are not infallible, and questionable and unverifiable assumptions and presumptions. Statistics and data sets should be the servants not the masters of decision makers. Unfortunately it would seem that statistics and data sets are the masters of strategic planners and Government Ministers.

7. CPRE Sussex – Horsham District refutes GL Hearn's and HDC's key presumption, which is that a pre-determined level of economic growth and job creation can be engineered and attained by building a specific number of houses. Tellingly, neither GL Hearn nor HDC have provided evidence to substantiate their extraordinary presumption and neither is the presumption substantiated by the Employment Land Review, which also informs the HDPF Preferred Strategy.

7.1. Furthermore, it is delusional to presume as does HDC and its consultants that the economy will grow unabated at a pre-determined rate over the period to 2031.

7.2. As is recognised, demonstrated and clearly stated by the Office for Budget Responsibility (OBR) in its 'Economic and fiscal outlook' (March 2013) "There is considerable uncertainty around any economic forecast".

7.3. In this report, too, the OBR advises that "The situation in the euro area also remains a major risk to our forecast, with the underlying situation still fragile and the completion of long-term structural and institutional reforms a long way off".

7.4. That economic forecasting is most certainly not an exact science and economic forecasters are not infallible is made clear by the OBR, in its 'Forecast evaluation report' (October 2012) where it advises that "Following the Coalition's first Budget in June 2010 we forecast that the recovery would be slower than its predecessors, but nowhere near as slow as it has been. We forecast that GDP would rise by 5.7 per cent from the first quarter of 2010 to the second quarter of 2012, but the latest data suggest it has grown by only 0.9 per cent".

8. That the current prolonged recession was not foreseen by the architects of the South East Plan should be a salutary lesson for Horsham District Council, central Government and its ministers. Unfortunately, lessons have not been learnt and communities in Horsham District are suffering the inequitable consequences as developers continue to submit opportunistic applications in anticipation that they will probably be permitted on Appeal by the Planning Inspectorate should HDC refuse them.

9. In conclusion, we do not believe that the proposed average annual build of 575 houses per year over 20 years is either sustainable or achievable over the 20 year period to 2031.

Draft Policy 13: 'East of Billingshurst'

1. CPRE Sussex-Horsham District considers that 'East of Billingshurst' is not a suitable and sustainable location for large-scale housing development.

2. HDC approved an application to build 475 houses on countryside east of Billingshurst on 20 August 2013 - less than a week after the start of the public consultation on HDC's 'HDPF Preferred Strategy Putting the economy first'. CPRE Sussex-Horsham District's considers that this decision was premature and has allowed the developer to pre-empt and therefore undermine the public consultation.

3. We are very concerned that HDC has decided that Billingshurst is a suitable site for strategic development in spite of considerable negative impacts notably on countryside and landscape and despite the objections of the Parish Council and Billingshurst residents.

3.1. The negative impacts on countryside and landscape is recognised by HDC in the 'HDPF Interim Sustainability Appraisal' where it states that "All sites will need sensitive landscaping – the westward extent of development at Southwater, northward at North Horsham and for the whole site at Billingshurst need to be clearly understood, and development will need to be designed to take into account landscape features and mitigate adverse impacts as much as possible". Quite so - nevertheless, the application to build 475 houses east of Billingshurst was permitted even though it was acknowledged by District Councillors at the Hearing that the development would be detrimental to countryside and landscape.

3.2. The considerable negative impacts of this development were identified and clearly explained by an HDC Officer in a response to the planning application in question –DC/13/0735. The Officer advised that he maintained "a very strong landscape objection to the proposed development", which would "result in significant material landscape and visual harm, even taking into consideration the proposed landscape mitigation measures (many of which have involved lengthy negotiation and even now are not fully supported by clear unambiguous plans)". "As a result the development is considered to be contrary to the National Planning Framework in respect of :Para 7- an environmental role in achieving sustainable development, Para 9- positive improvements in the quality of the built and natural environment, Para 17-take account of the different roles and character of different areas, Para 61- planning decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment" (Email: M. Bright to H.Corke, 7 Aug 13).

4. The supposed 'benefits' of this development are in reality essential mitigation measures made necessary by the scale of the development and the consequent substantial increase in the village's population.

4.1. The supposed 'benefits' will be of little or no benefit to the existing community, which has already had development imposed on it by developers and the Planning Inspectorate– by Appeal.

5. The development will be a dormitory for commuters who will be employed at locations outside of the village to which the majority will probably travel, as now, by car.

6. Moreover, the application, which HDC has approved, was developer driven and contrary to the NPPF's Ministerial Foreword, which stipulates that planning "should be a collective enterprise", which should "include, people and communities". This application was most certainly not a collective enterprise and the decision to permit was contrary to the wishes of the Parish Council and residents.

7. It is our position that that the HDPF Preferred Strategy allocation of c. 500 houses has now been met - and that Billingshurst is not a suitable and sustainable location for further large-scale housing development.

7.1. The village's community should decide Billingshurst's actual housing need and expedite required development through Neighbourhood Planning.

Draft Policy 13: 'West of Southwater'

1. 'West of Southwater' comprises countryside – land which is actively farmed and contributes to the wider economy.

1.1. It is our considered view that Southwater is not a suitable and sustainable location for large-scale housing development. Our objection to the current planning application (currently on-hold) to build on this countryside still stands.

2.. The supposed 'public benefits' arising from the development proposed by the application, include contributions towards the cost of infrastructure and community facilities made necessary by and in consequence of the scale of the development and consequent huge increase in the size of Southwater's population. The supposed 'public benefits' will be of little or no benefit to the existing community

3. Contrary to the applicant's Design and Access Statement (DAS) – land west of Worthing Road (e.g. west of Southwater) is not a 'sustainable location' for 'housing growth'.

4. Southwater does not have good public transport accessibility. This was the view of the South East Plan Panel (2007), since when there has been no improvement. New residents who commute to places of work outside of Southwater will be car dependent, as the majority are now.

5. It is apparent that the development is intended to accommodate people who work elsewhere. Despite the obligatory 'Green Travel Plan' the development would be a car-dependent-commuter dormitory, which would have an adverse impact on the local and wider and already-congested-road network – congestion that will be made much worse by the cumulative impacts of the 2,000 plus houses now under construction west of Horsham. Neither the HDPF Preferred Strategy nor the HDPF Interim Sustainability Appraisal takes into account the close proximity and cumulative impact of the intended development west of Southwater and the huge west of Horsham development now being built.

6. The Environment Agency's comments and concerns expressed in its submission (HA/2011/111972/04-L01), dated 15 May 12, indicate that the proposed development would have considerable adverse environmental impacts should the Agency's requirements not be met by the developer.

7. We consider that the negative impact on landscape and countryside of building 500 houses west of Southwater is understated in the HDPF Preferred Strategy and HDPF Interim Sustainability Appraisal.

8. The substantial negative impacts of development on landscape and countryside were identified and clearly explained in 'Horsham District Council Landscape Consultation Response 3' (June 2012). In the opening 'Summary' section of this document, it is stated that:

"Whilst an important application amendment has been made in respect of the land south of Greathouse Farm and some further supporting illustrative landscape masterplan information has been submitted a number of serious concerns remain with this application".

"These relate to significant cumulative adverse landscape character resulting from the extent, density, height/scale and suburban character of the proposed development within parts of the application area and insufficient retention of/certainty about retention of trees and hedgerows. These impacts particularly, but not exclusively, occur where the development extends out westwards into attractive, unspoilt countryside of high sensitivity and low landscape capacity in the vicinity of College Farm and along the Downs Link. In addition there is likely to be significant material visual amenity harm to residents of a large number of existing properties on the boundary with the application site, south of Church Lane, where no structural landscape buffer is currently shown to be provided to mitigate the impact on their visual amenity."

"Furthermore whilst there is not a fundamental objection in principle to some carefully sited and well designed development within the West of Southwater application site area and there is potential for some positive benefits from the scheme, taking account of some good landscape design principles established for parts of the development and for its open spaces, it is not considered these will outweigh the negative impacts identified from the specific parameters of the development. Hence my landscape objection to the development is maintained".

"The application is considered on balance to be contrary or does not demonstrate sufficient account has been taken of various planning principles and policies of the National Planning Policy Framework ":

9. The results of public consultation - Draft Interim Statement: Managing Development in Horsham District Non Statutory Planning Guidance Document (January 2011) showed that the great majority of Southwater's residents who participated in the consultation were opposed to building 500 houses on countryside west of Worthing Road, Southwater. HDC and the applicant are therefore seeking to impose a major development on Southwater that is contrary to the wishes of the community.

10. It is our considered view that Southwater is not a suitable and sustainable location for large-scale housing development.

11. The village's community, NOT developers, should decide Southwater's actual housing need and expedite required development through Neighbourhood Planning.

Draft Policy 14: 'North of Horsham'

1. CPRE Sussex-Horsham District considers HDC's concept and aspiration for a 'strategic mixed use development' on countryside north of Horsham to be flawed.

2. At the Council meeting held 25 July 2013, leading Councillors promoted the intended 'north of Horsham' development as the future growth engine for Horsham District, which it was explained would provide 'high quality well paid jobs' for Horsham's young people on their 'doorstep', and obviate the need for residents to work outside of the District. It was envisaged that 'young people' employed at the business park would reside in the adjoining residential development. This concept is flawed because HDC can neither compel businesses to confine their recruitment to Horsham's 'young people', nor developers the sale of new houses to same. Added to which a new railway station 'north of Horsham', if sufficient funds could be found to pay for it, would facilitate commuting to London and other locations outside of the District. 'North of Horsham' would become another dormitory settlement, serving the needs of Gatwick/Crawley and London – not Horsham.

3. HDPF Preferred Strategy acknowledges at paragraph 5.72 that "The North West Sussex Employment Land Review indicates that there is sufficient provision of employment land in the District, but existing sites may need to evolve in the future in order to meet modern needs".

3.1. We note that the potential impacts of the intended business park on existing employment sites is not explained either in the HDPF Preferred Strategy or by the HDPF Interim Sustainability Appraisal. For example, would the creation of a business park north of Horsham result in redundancy of existing employment sites? These are fundamental issues that should be identified and addressed by the HDPF Preferred Strategy.

4. HDPF Preferred Strategy, paragraph 5.79 rightly acknowledges that "Transport access, and ease of movement is a key factor in the performance of the local economy, enabling residents to travel to their place of work, and also allow the movement of goods and services. One key transport characteristic for Horsham District is its high levels of car ownership and car use". The vast business park and residential development would have a huge and detrimental impact on the District's already congested road network, with resultant costs and a need for substantial funding.

5. HDC has previously indicated that this enormous strategic development would facilitate and enable a new hospital to be built. We note that the hospital has now been transmogrified to a 'medical centre', essentially to meet the needs of the development's residents rather than the wider community.

5.1. According to a report in the West Sussex County Times (26 Sep 13) the chief executive of Surrey and Sussex Healthcare NHS Trust that runs East Surrey Hospital

told Horsham District Councillors that “There’s a tremendous pressure on acute providers because of the way in which demography is changing” and “We have not prepared for the demographic changes that we are having to face. That’s the problem”.

5.2. Building 2500 new houses north of Horsham can only exacerbate the existing and worsening ‘problem’.

6. Draft Policy 14 states that “alongside the business park a parkway station shall be provided that includes a park and ride type facility including sustainable transport links to Horsham town and Horsham train station”. Presumably, the ‘parkway station’ is a ‘train’ station (railway station), in which case why would a ‘transport link’ be needed to ‘Horsham train station’? Whether a railway station will be provided ‘north of Horsham’ seems to be in doubt as was made clear at the Council Meeting held 25 July 2013, when Councillors debated the draft Horsham District Planning Framework (HDPF) – Preferred Strategy Consultation document.

6.1. The HDPF Preferred Strategy omits to mention not only that there are railway stations at Faygate, Ifield and Littlehaven but that a large proportion of trains do not stop at them.

7. At this same meeting it was made clear that the level and cost of the infrastructure that would be required for the intended huge housing estate and extensive business park to be viable had yet to be assessed; likewise its impact on the local and wider road networks.

8. Information in public view and the debate by Councillors at the Council Meeting held 25 July 2013 seems to indicate that this ‘proposed mixed-use development’ would be, if permitted, speculative and a gamble by Horsham District Council because the supposed ‘benefits for Horsham’ appear to be possibilities, not certainties, notably:

- a. It may or may not attract wealth generating businesses into the District.
- b. it may or may not create a substantial number of new ‘quality’ jobs.
- c. It may or may not be provided with its own railway station.
- d. it may or may not be provided with new Secondary and Primary Schools.
- e. It may or may not provide 30% or significantly fewer affordable homes.

8.1. It would certainly create an enormous requirement for new infrastructure and expanded essential services with resultant costs and a need for substantial funding.

8.2. It would certainly have a huge and detrimental impact on the District’s already congested road network, with resultant need for major upgrades with resultant costs and a need for substantial funding.

8.3. It would certainly result in the loss of around 800 acres of irreplaceable countryside, and productive farmland.

Draft Policy 15: provision of ‘affordable homes’

1. HDC rightly highlights in the HDPF (e.g. paragraph 6.2) the urgent need for affordable housing in Horsham District. However, CPRE Sussex-Horsham District is very concerned that HDC has reduced its requirement for affordable homes on sites providing 15 or more dwellings from 40% to 35%.

1.1. We are also concerned that the provision of affordable homes in Horsham District, as expressed in Draft Policy 15, is dependent entirely on the sale of new market housing. This is a high-risk-of-failure strategy because NPPF Paragraph 173 seeks to maximise developer profits by limiting developer and site owner contributions not only towards the provision of essential infrastructure but also affordable homes. NPPF Paragraph 173 stipulates that *“To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable*

1.2. The other key limiting factor to the provision of affordable homes is that the HDC's proposed house-building target is dependent on the presumption of unabated economic growth over the period to 2031. This is an unrealistic and flawed presumption, as we have explained in our response to HDPF Draft Policy 13.

2. There is an urgent need for HDC to identify alternative sources of funding that are not dependant on the sale of market housing - in order to ensure the provision of affordable homes to meet actual local need throughout the plan period.

2.1. We are pleased that HDC has explicitly recognised this essential need in its 'Note: Alternative Methods'. However, this 'Note' is presented in a separate stand-alone box beneath Draft Policy 15. This apparent afterthought should be integral to not separate from Draft Policy 15.

3. In the 'Note: Alternative Methods' box, HDC rightly stipulates that “ There is an urgent need to bring forward as much affordable housing as possible particularly for local people who are trying to get on the housing ladder”. We ask that this requirement be written in to Draft Policy 15 together with the caveat that

The people expressing a need to live in the settlement will need to show that they:

a. Are unable to afford open market housing which is for rent or sale within the settlement.

b. Are closely connected or have previously been closely connected to the settlement through work or residence;

c. Have immediate family (parents, grandparents adult, children or siblings) who live in the settlement;

d. Need to move to a particular settlement where failure to meet that need would cause hardship to themselves or to others; or

e. Have a real need to live in the settlement to support or be supported by a member of family ordinarily resident in the settlement. AND

In the South Downs National Park affordable housing provision should meet the needs local communities in the National Park area.

CHAPTER 8: PRESERVING THE ENVIRONMENT AND CHARACTER OF THE DISTRICT

Page 59

1. At page 59, HDC lists 'issues' that "have been identified that would need to be addressed" is inadequate because it understates and omits significant issues relating to the natural environment, including biodiversity, habitats and ecology, as follows:

- a. That the District's natural environment is at significant risk of being damaged through increasing human pressure.
- b. The NPPF requirement at Paragraph 117 to "promote the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring in the plan".
- c. The NPPF requirement at Paragraph 109 that "The planning system should contribute to and enhance the natural and local environment by:
 - minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"

1.1. The list at page 59 stipulates that "Any proposals for development should consider the impact on the historic evolution of the District". It is our view that the page 59 list should also stipulate that "Any proposals for development will consider the impact on biodiversity, habitats, ecology and ecological networks".

Contrary to HDC's understanding, 'Green Infrastructure' and 'Ecological Networks' are not one and the same.

2. The list at page 59 of issues that "have been identified that would need to be addressed", stipulates that "In addition to protecting designated sites, other habitats and species should be protected and enhanced, for example through the provision of green infrastructure"

2.1. CPRE Sussex-Horsham District is very concerned that:

- a. What constitutes 'green infrastructure' is neither explained nor defined in the HDPF Preferred Strategy and is omitted from that document's glossary. We ask that 'Green Infrastructure' be defined and its purpose and importance explained in the HDPF Preferred Strategy document.
- b. The HDPF apparently conflates and confuses 'green infrastructure' with 'ecological networks', (which are not explicitly mentioned in the HDPF Preferred Strategy document), treating them as if they are one and the same, which as is made clear by the NPPF they are not.

2.2. The NPPF defines 'Green Infrastructure' as: "A network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities"

AND states that 'Ecological Networks' "link sites of biodiversity importance".

2.3. The importance of 'Ecological Networks' for biodiversity and the natural environment is explicitly emphasised by the NPPF '11 Conserving and enhancing the natural environment' Paragraphs 109, 113, 117 and 165.

a. NPPF Paragraph 109 stipulates that "The planning system should contribute to and enhance the natural and local environment by:

"minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent **ecological networks** that are more resilient to current and future pressures";

b. NPPF Paragraph 113. "Local planning authorities should set **criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged**. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and **the contribution that they make to wider ecological networks**".

c. NPPF Paragraph 117 stipulates that "To minimise impacts on biodiversity and geodiversity, planning policies should:

"•plan for biodiversity at a landscape-scale across local authority boundaries";
"•identify and map components of **the local ecological networks**, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;"

"•promote the preservation, restoration and re-creation of priority habitats, **ecological networks** and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan";

d. NPPF Paragraph 165 stipulates that "Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include **an assessment of existing and potential components of ecological networks**. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors".

2.4. In addition to the NPPF Paragraphs quoted above, we refer HDC to Article 10 of the Habitats Directive, which requires “Member States to endeavour to encourage the management of features of the landscape that are of major importance for wild flora and fauna. These features are those that, because of their linear and continuous structure or their function as stepping-stones, are essential for migration, dispersal and genetic exchange. Examples given in the Directive are rivers with their banks, traditional field boundary systems (such as hedgerows), ponds and small woods. Suitable planning conditions and obligations may serve to promote such management”.

2.5. Clearly, ‘ecological networks’ are of major importance for biodiversity, habitats and the natural environment. We are very concerned that HDC has conflated and confused ‘green infrastructure’ with ‘ecological networks’ and has not recognised the importance and vital function of ecological networks in its HDPF Preferred Strategy, Spatial objectives and policies.

2.6. We ask that the importance and vital function of ecological networks be properly recognised by HDC in its HDPF Preferred Strategy, Spatial Objectives and policies – and where appropriate the words ‘green infrastructure’ be replaced with the ‘ecological networks’. For example, as is made clear by the NPPF and Article 10 of the Habitats Directive, ecological networks are vital for the well being of biodiversity, habitats, ecology and the natural environment.

2.7. Accordingly, HDC’s issue that “would need to be addressed” (HDPF Preferred Strategy page 59) should be rewritten to read “In addition to protecting designated sites, other habitats and species should be protected and enhanced, for example through the provision of ecological networks” – ‘ecological networks’ in place of ‘green infrastructure’.

1. CPRE Sussex-Horsham District asks that the issues listed at page 59 relating to the natural environment, including biodiversity, habitats and ecology, that would need to be addressed include the following:

- a. That the District’s natural environment is at significant risk of being damaged through increasing human pressure.
- b. The requirement that “Any proposals for development will consider the impact on biodiversity, habitats, ecology and ecological networks”.
- c. The NPPF requirement at Paragraph 117 to “promote the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring in the plan”.
- d. The NPPF requirement at Paragraph 109 that “The planning system should contribute to and enhance the natural and local environment by:
 - minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”

2. HDC's issue that "In addition to protecting designated sites, other habitats and species should protected and enhanced" be rewritten to read "In addition to protecting designated sites, other habitats and species should be protected and enhanced, for example through the provision of ecological networks" – 'ecological networks' in place of 'green infrastructure'

3. The importance and vital function of 'ecological networks' be decoupled from 'Green Infrastructure' and be properly recognised by HDC in its HDPF Preferred Strategy, Spatial Objectives and policies (as it is by the NPPF).

High Quality Environment, paragraph 8.1

1. At paragraph 8.1, HDC rightly acknowledges that Horsham District "has a very high quality environment" and recognises that this high quality environment "is an essential part of what makes the area an attractive place to live and work and in this respect has an important role to play in contributing to the wider economy". HDC also advises at paragraph 8.1 that "The environment also has a vital role to play in maintaining systems, and provides 'services' such as flood attenuation and providing space for food production".

2.1. Unfortunately, no explanation is given either in paragraph 8.1 or in the HDPF Preferred Strategy's glossary of what is here meant by 'systems'. Presumably 'systems' in the context of 'high quality environment' means 'ecosystems' – given the juxtaposition of 'systems' with 'services' - and the planning requirement stipulated by NPPF Paragraph 109 that "The planning system should contribute to and enhance the natural and local environment by (among other actions) "recognising the wider benefits of ecosystems services".

2.2. The importance of ecosystems and the services they provide to society underpinned 'The Natural Environment White Paper (NEWP) and the Government's commitment "to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks with more and better places for nature for the benefit of wildlife and people" (NEWP, page 17).

2.3. HDC is therefore required to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks with more and better places for nature for the benefit of wildlife and nature". It has also to comply with the explicit requirements of the NPPF as follows:

a. NPPF Paragraph 109: "The planning system should contribute to and enhance the natural and local environment by: "minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent **ecological networks** that are more resilient to current and future pressures".

b. NPPF Paragraph 113: "Local planning authorities should set **criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged**. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with

their status and gives appropriate weight to their importance and **the contribution that they make to wider ecological networks**".

c. NPPF Paragraph 114 stipulates that "local planning authorities should: "set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;"

d. NPPF Paragraph 117: "To minimise impacts on biodiversity and geodiversity, planning policies should:
"•plan for biodiversity at a landscape-scale across local authority boundaries";

"•identify and map components of **the local ecological networks**, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation";

"•promote the preservation, restoration and re-creation of priority habitats, **ecological networks** and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan";

e. NPPF Paragraph 165: "Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors".

2.4. CPRE Sussex-Horsham District is very concerned that:

a. The HDPF Preferred Strategy omits networks of biodiversity and the NPPF Preferred Strategy requirement to plan positively for their creation, protection, enhancement and management – as it should in compliance NPPF Paragraph 114.

b. The HDPF Preferred Strategy misleadingly conflates and confuses 'green infrastructure' with 'ecological networks', (which are not explicitly mentioned in the HDPF Preferred Strategy document), treating them as if they are one and the same, which as is made clear by the NPPF they are not.

c. Contrary to NPPF Paragraph 117 the HDPF Preferred Strategy does not promote the preservation, restoration and recreation of ecological networks in Horsham District – as it should in compliance with the NPPF

d. There is no indication in the HDPF Preferred Strategy that components of the local ecological networks have been identified and mapped as required by NPPF Paragraph 117.

e. There is no indication in the HDPF Preferred Strategy that HDC has either assessed existing and potential components of ecological networks, as opposed to 'Green Infrastructure' or worked with or consulted the Local Nature Partnership – as it should in compliance with NPPF Paragraph 165.

We ask that HDC re-write its draft policies or provide an additional draft policy to comply fully with the NPPF Paragraphs cited above.

Landscape:- paragraph 8.4

1 CPRE Sussex-Horsham District recommend that the following addition be made to paragraph 8.4: "Landscape areas classified as being either having low/no capacity or low/moderate capacity should only be built upon in exceptional circumstances when no other suitable location for the required development can be determined. For the medium villages and smaller villages, any perceived exceptional circumstances would also need to be thoroughly tested in relation to local needs, detailed landscape assessments and, if present, Neighbourhood Plans".

2. We are very concerned that "the recent Landscape Capacity Assessment", referred to at paragraph 8.4, which apparently informs sections of the HDPF Interim Sustainability Appraisal Environmental Report of the Preferred Strategy and should also inform the HDPF Preferred Strategy document, has not been made available on-line for public scrutiny.

Biodiversity:- paragraph 8.7

1. HDC should be mindful that "Many people value our countryside for quiet enjoyment – be it walking, wildlife watching or cycling-for spiritual refreshment and well-being. Direct enjoyment of biodiversity is a major reason for these countryside visits: survey evidence suggests that birds and wildlife were the primary reason influencing the decision of 59% of visitors to the countryside" (A Biodiversity Strategy for England, DEFRA 2002)

1.1. CPRE Sussex-Horsham District is very concerned that the value and benefits of biodiversity are not adequately recognised either by the HDPF Preferred Strategy or by its draft policies. It is our view that the value and benefits of biodiversity should be explicitly recognised by the HDPF Preferred Strategy; after all:

"Environmental assets contribute to managing risks to economic and social activity, helping to regulate flood risks, regulating the local climate (both air quality and temperature), and maintaining the supply of clean water and other resources. This underpins economic activity and wellbeing, and so maintaining the condition of natural assets is a key factor in sustaining growth for the longer term" (Defra Evidence and Analysis Series Paper 2 Economic Growth and the Environment, 2010).

2. CPRE Sussex-Horsham District is very concerned that whilst the Interim Sustainable Appraisal Environmental Report of the Preferred Strategy paragraph 5.38 identifies the need to protect Biodiversity Opportunity Areas (BOAs) in Horsham District as an 'Emerging Issue for the Horsham District Planning Framework', BOAs are neither mentioned nor recognised in the HDPF Preferred Strategy and its draft policies.

2.1. We ask that BOAs be recognised in the HDPF Preferred Strategy and its policies – and explained in the document's glossary.

Draft Policy 23

1. CPRE Sussex – Horsham District is very concerned that contrary to the requirements of the NPPF Draft Policy 23 does NOT:

- a. Recognise or explicitly state the requirement for the planning system and therefore local plans not just to minimise impacts on biodiversity but also to provide net gains in biodiversity, in order "to contribute to and enhance the natural and local environment" as stipulated by NPPF Paragraph 109.
 - b. Explicitly state the requirement "to establish coherent ecological networks that are more resilient to current and future pressures" – as stipulated by NPPF Paragraph 109
 - c. Explicitly state the requirement to "promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan"; as stipulated by NPPF Paragraph 117.
2. HDC should be mindful that the Natural Environment and Rural Communities (NERC) Act 2006 imposes a statutory obligation on every local authority to conserve, restore and enhance biodiversity. Specifically (NERC) Act 2006 Section 40(1) Imposes a duty to conserve biodiversity: "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity" and Section 40(3) stipulates that "Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat". This duty applies to all local authorities and extends beyond just conserving what is already there to carrying out, supporting and requiring actions that may also restore or enhance biodiversity
3. The vital duty to conserve, restore and enhance biodiversity must be acknowledged in the HDPF and included and explicitly stated in Draft Policy 23.

1. Draft Policy 23 should be rewritten so as to comply fully with the requirements of NPPF Paragraphs 109 and 117 and NERC Act 2006 Sections 40(1) and 40(3):

- a. to provide net gains in biodiversity, in order to contribute to and enhance the natural and local environment".
- b. to establish coherent ecological networks that are more resilient to current and future pressures

c. to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local target

2. We suggest Draft Policy 23 sub para c is rewritten to include the following:

“Contribute to and enhance the natural and local environment by providing net gains in biodiversity, promote the preservation, restoration and re-creation of priority habitats and existing ecological networks and the protection and recovery of priority species populations”.

‘Countryside Protection’: paragraphs 8.15 and 8.16

1. NPPF Paragraph 117 stipulates the requirement for planning as a Core Planning Principle to recognise “the intrinsic character and beauty of the countryside”.

1.1. CPRE Sussex-Horsham District considers that this Core Planning Principle is not explicitly recognised by paragraphs 8.15 and 8.16 and Draft Policy 27. Neither do these paragraphs and policy explicitly recognise that: “Many people value our countryside for quiet enjoyment – be it walking, wildlife watching or cycling-for spiritual refreshment and well-being. Direct enjoyment of biodiversity is a major reason for these countryside visits: survey evidence suggests that birds and wildlife were the primary reason influencing the decision of 59% of visitors to the countryside” (A Biodiversity Strategy for England, DEFRA 2002). We are also concerned that Draft Policy 27 lacks clearly stated objectives.

1.2. Accordingly It is our view that paragraphs 8.15 and 8.16 should be rewritten and Draft Policy 27 revised so as to comply with NPPF Paragraph 117 – and to recognise that “Many people value our countryside for quiet enjoyment – be it walking, wildlife watching or cycling-for spiritual refreshment and well-being. Direct enjoyment of biodiversity is a major reason for these countryside visits”.

2. NPPF Paragraph 112 states that “Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality” (The NPPF defines the ‘best and most versatile agricultural land as land in grades 1,2 and 3a of the Agricultural Land Classification).

2.1. CPRE Sussex-Horsham District are very concerned that the HDPF Preferred Strategy does not recognise this requirement – as it should. We ask that the requirement stipulated by NPPF Paragraph 112 be recognised and included in the new policies

HDPF Preferred Strategy: Draft Policy 32

1. CPRE Sussex is very concerned that in marked contrast to the ‘HDPF Interim Sustainability Appraisal Environmental Report of the Preferred Strategy August 2013’ the importance of the District’s biodiversity, flora and fauna is not adequately recognised in the HDPF itself.

1.1. CPRE Sussex-Horsham District is very concerned that the wording of HDPF Draft Policy 32 policy does not carry the same weight as that of the relevant NPPF Paragraphs and the Statutory Regulations that should inform and underpin Draft Policy 32.

1.2. We ask that Draft Policy 32 paragraph 1 be rewritten to include a specific commitment, not only to 'Minimising impacts on biodiversity' but also to providing net gains in biodiversity where possible and to promoting the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets – in compliance with NPPF Paragraphs 109 and 117.

AND The requirement in Draft Policy 32 paragraph 2 to "explore opportunities to create and manage new areas where appropriate" is replaced with the requirement "to provide and enable opportunities to create and manage new areas where appropriate". In this context, to 'provide and enable' requires a tangible outcome unlike the requirement 'to explore', which does not.

2. Draft Policy 32 paragraph 2 states that "The Council will encourage new development to make a positive contribution to biodiversity through the creation of green spaces, and linkages between sites to create a local and regional network of wildlife corridors and green infrastructure".

2.1. CPRE Sussex-Horsham District considers that the use of 'encourage' in this context is inappropriate and does not carry sufficient weight. We propose instead the unambiguous requirement that: "Development proposals must maintain, enhance and protect the District's biodiversity and its surrounding environment". "New development will be required to: " and specify in terms what new development will be required to do in order to maintain, enhance and protect district wide biodiversity and habitats, including those outside of sites and areas without designated protection.

2.2. Presumably "wildlife corridors" in Draft Policy 32 paragraph 2 equates to the NPPF's "ecological networks" and "networks of biodiversity" (NPPF Paragraphs 109, 113, 114, 117 and 165).

2.3. We consider that the term 'wildlife corridor' in Draft Policy 32 could result in some confusion. Hedgerows, for example, provide important links and routes and therefore 'ecological networks' for mobile species – flora as well as fauna, using blocks of ancient woodland in the wider landscape. This should be clearly explained in the HDPF Preferred Strategy and its glossary. Alternatively, HDC could align its wording to that of the NPPF by using the descriptors 'ecological networks' and 'networks of biodiversity'.

3. We are very concerned that paragraph 2 of Draft Policy 32 does NOT recognise that an extensive network of "wildlife corridors" (ecological networks and networks of biodiversity) already exist in Horsham District. NPPF Paragraph NPPF Paragraph 114, stipulates that "local planning authorities should:

- “● set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”

3.1. The requirement “to plan positively for the protection, enhancement and management of networks of biodiversity and green infrastructure, as well as creating such networks where they do not exist”, should be clearly stated in draft Policy 32.

3.2. We refer HDC to Article 10 of the Habitats Directive, which requires “Member States to endeavour to encourage the management of features of the landscape that are of major importance for wild flora and fauna. These features are those that, because of their linear and continuous structure or their function as stepping-stones, are essential for migration, dispersal and genetic exchange. Examples given in the Directive are rivers with their banks, traditional field boundary systems (such as hedgerows), ponds and small woods. Suitable planning conditions and obligations may serve to promote such management”.

3.3. We ask that “habitats that are of principal importance for the conservation of biodiversity in England” be added to HDPF Draft Policy 32 paragraph 4, sub paragraph c of Paragraph 4 of Policy 32: Sub-paragraph c to read “Sites of nature conservation importance, local nature reserves and areas of Ancient woodland and other habitats that are of principal importance for the conservation of biodiversity in England not identified in 1 & 2 above”. Ancient woodland is an irreplaceable habitat of principal importance in England, hence it is logical to include all designated habitats of principal importance.

4. Draft Policy 32, paragraph 5 stipulates that: “Where development is anticipated to have a direct or indirect adverse impact on sites or features for biodiversity, development will be refused unless it can be demonstrated that:

- a. the reason for the development clearly outweighs the need to protect the value of the site; and
- b. that mitigation and compensation measures are provided”.

4.1. CPRE Sussex-Horsham District considers that the wording of paragraph 5 does not comply in the detail as it should with NPPF Paragraph 152 sub para b. NPPF Paragraph 152 stipulates that:

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate”.

4.2. We are very concerned that Draft Policy 32 paragraph 5 omits the obligation to pursue, wherever possible, “alternative options which reduce or eliminate significant adverse impacts” and also that “where adequate mitigation measures are not possible compensatory measures may be appropriate”. We ask that these essential requirements be written into Draft Policy 32.

4.3. CPRE Sussex-Horsham District considers that Draft Policy 32 should also recognise and state the requirement stipulated by NPPF Paragraph 176 that:

“Where safeguards are necessary to make a particular development acceptable in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements. The need for such safeguards should be clearly justified through discussions with the applicant, and the options for keeping such costs to a minimum fully explored, so that development is not inhibited unnecessarily”.

CHAPTER 9: CLIMATE CHANGE

Draft Policy 37, paragraphs 3 and 4: ‘SUDS’

1. CPRE Sussex-Horsham District note that HDPF Draft Policy 37 paragraph 3 stipulates that: “Where technically feasible, all developments will be expected to incorporate water management measures which reduce the risk of flooding and ensure flood risk is not increased elsewhere. This should include the use of sustainable drainage systems (SuDS)”.

1.1. The use of ‘should’ seems to indicate that the requirement is tentative and optional when in the context of Draft Policy 37 paragraph 3 the stipulated action is an essential requisite.

1.2. We therefore ask that paragraph 3 be changed to: “Where technically feasible, all developments will be expected to incorporate water management measures, including the use of sustainable drainage systems (SuDS), which reduce the risk of flooding and ensure flood risk is not increased elsewhere”.

2. We note that HDPF Draft Policy 37 paragraph 4 stipulates that: “The vulnerability and importance of local ecological resources such as water quality and biodiversity should be considered when determining the suitability of SuDS. New developments should undertake more detailed assessments to consider the most appropriate SuDS methods for each site. Consideration should also be given to amenity value and green infrastructure”.

2.1. The use of ‘should’ instead of ‘will’ seems to indicate that the requirement is tentative and optional when in the context of Draft Policy 37 paragraph 4 the stipulated actions are essential requisites.

2.2. We therefore consider that ‘should’ be replaced with ‘will’.

3. CPRE Sussex-Horsham District is concerned that the need to maintain sustainable drainage systems where provided, post their installation, is neither recognised nor addressed in HDPF Draft Policy 37 nor in any other HDPF’s draft policies. This essential requirement should be recognised and explicitly stated in HDPF Draft Policy 37.

CHAPTER 10: INFRASTRUCTURE AND TRANSPORT

Draft Policy 38: ‘Infrastructure’

1. CPRE Sussex-Horsham District note that HDPF Draft Policy 38 includes the requirement that: “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. Where there is a need for extra capacity this will need to be provided in time to serve the development or the relevant phase of the development, in order to ensure that the environment and amenities of local residents are not adversely affected”.

1.1. We ask that this requirement be reinforced by the essential stipulation that “development should not be approved if the measures required cannot be secured through appropriate conditions or agreements” – as required by NPPF Paragraph 176, and “the provision of infrastructure should be in advance of the relevant new developments being occupied” – as required by NPPF Paragraph 177.

2. NPPF Paragraph 177 stipulates that: “It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review”.

2.1. CPRE Sussex-Horsham District is very concerned that contrary to NPPF 177, the requirement for and cost of the essential infrastructure needed in consequence of HDC’s preferred development strategy has yet to be determined and properly assessed – and made public. That this essential work had not been completed was made clear at the Council Meeting held 25 July 2013, when Councillors debated the draft Horsham District Planning Framework (HDPF) – Preferred Strategy Consultation document.

2.2.. This significant omission is surprising given that HDC has previously highlighted in its ‘Horsham District Planning Framework How much housing does Horsham District need?’ (2012, paragraph 5.11, citing Horsham District Infrastructure Study Main Report May 2010) *“that there are clear delivery risks; particularly around the availability of funding. This is difficult to forecast as costs vary across different areas and types of development, in addition there are infrastructure efficiencies that could be exploited. This is emphasised by the report, as the distribution of development across the District will influence infrastructure costs and delivery timescales. There will need to be consideration given to the phasing of development and the prioritisation of infrastructure provision.”*

2.3. HDC officials at the HDC exhibition to promote strategic development east of Billingshurst, held in Billingshurst village hall on 29 January 2010, conceded that provision of ‘facilities’ by the developer to meet community aspirations and needs was not assured, even if “Option 3” development were permitted. Likewise the developers at their exhibition, 15 January 2010, advised that the provision of community facilities by them was subject to negotiation and their having sufficient funds to pay for them. Significantly, too, the developers advised that the provision of affordable homes would be subject to negotiation.

2.4.. HDC in its 'Draft Interim Statement: Managing development in Horsham District Non-Statutory Planning Guidance Document, January 2011 conceded at Appendix 2 paragraph 2.7 that "there are clear delivery risks for infrastructure particularly around the availability of funding", whilst at Appendix 3 paragraph 3.2, HDC cautioned that "it cannot guarantee to deliver all of these aspirations through development". Apparently, the risks remain the same, though they are not explicitly acknowledged in the HDPF Preferred Strategy document.

2.5.. Infrastructure and the availability of funding sufficient to pay for it are key issues, not least because in order to facilitate development the Government has sought to reduce developer contributions by stipulating at NPPF Paragraph 173 that "*Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable*".

3. We consider that the huge and unprecedented number of houses, which HDC is seeking to have built and the consequent substantial increase in the District's population, cannot be accommodated sustainably.

3.1. This essential fact was acknowledged by Horsham District Council, 7 June 2006, C0/24 The South East Plan – draft Plan for Submission to Government: Resolved (i) (a) "*the level of housing development proposed in Horsham District over the period to 2026 (Policy H1) is high and at the upper limit of what can sustainably be accommodated*" .. . "*Indeed, the Council has severe reservations about what is now proposed and the implications for the future of the Development*".

3.2. This concern is restated in the Draft SE Plan Panel Report: August 2007: para 24.58 "*The Council regards this level as very demanding for environmental and infrastructure reasons and it argues that any higher level would be likely to have unacceptable environmental impacts and could not be realistically delivered within the Plan period*" – AND the huge target set for Horsham District has not been achieved because it was EXCESSIVE and UNACHIEVABLE.

CHAPTER 11: HEALTHY COMMUNITIES

Draft Policy 41: re 'provision of new or improved community facilities or services'

1. According to a report in the West Sussex County Times (26 Sep 13) the chief executive of Surrey and Sussex Healthcare NHS Trust that runs East Surrey Hospital told Horsham District Councillors that "There's a tremendous pressure on acute providers because the way in which demography is changing" and "We have not prepared for the demographic changes that we are having to face. That's the problem"..

1.1. HDPF Preferred Strategy Draft Policy 2 states that strategic development “immediately to the north of Horsham town of 2,500 dwellings to meet the strategic requirement for new homes and to provide access to new employment, health, educational and recreational opportunities”. Previously HDC has indicated that this huge development would include a new hospital. However, it was made clear at the Council Meeting held 25 July 2013, when Councillors debated the draft Horsham District ‘Planning Framework (HDPF) – Preferred Strategy Consultation document’ that a hospital would not be provided by this development.

1.2. CPRE Sussex-Horsham District is very concerned that the ‘issues’ identified by HDC “that would need to be addressed”, listed on page 87 of the HDPF Preferred Strategy makes no mention of the need to provide either additional GPs or hospital facilities, including accident and emergency ambulance cover, for the substantially increased population. This key issue is neither addressed by Draft Policy 41 nor by any other draft policy in the HDPF Preferred Strategy.

1.3 CPRE Sussex – Horsham District considers that HDC is therefore failing to fulfil the ‘social role’ of the planning system stipulated by NPPF Paragraph 7, which includes the requirement to provide “accessible local services that reflect the community’s needs and support its health, social and cultural well-being”

2. HDC should be mindful that as is explained in the Ministerial foreword to the NPPF: “Sustainable “ means “ensuring that better lives for ourselves don’t mean worse lives for future generations”. Inadequate provision for medical and health care for an increasing population will mean worse lives not only for future generations but also for communities in the present.

Dr R F Smith

Chairman CPRE Sussex – Horsham District

11 October 2013