



Horsham Local Plan Regulation 19 Publication Plan Consultation Response

Spatial Strategy Review

Land West of Ifield

Save West of Ifield

Contents

1.	Part 1 SWOI Executive Summary	3
2.	Part 2 Regulation 19 Publication Plan Policy Review	5
3	Part 3 Regulation 19 Publication Plan Spatial Strategy Review	41



SWOI Executive Summary

Save West of Ifield (SWOI) have been campaigning against the Homes England proposals to develop land west of Ifield for 10,000 new homes for over three years. The loss of valued landscape and recreational land to local communities would be significant and exacerbates existing issues of poor air quality, insufficient highway capacity and infrastructure, would contribute to existing water supply issues and would increase the deficit already experienced by local communities who lack sufficient parks and recreational land as well as causing a significant loss of biodiversity.

The regulation 19 consultation for the Horsham Local Plan and accompanying evidence has demonstrated that no progress has been made between Crawley and Horsham to address residents' previous concerns about this potential allocation. The significant issues raised now either form a set of policy requirements or are not addressed at all, and instead of solutions we have a promise that Homes England will address the issues further along the process, away from formal consultation.

The fundamental issue of this plan, a thread running through all of the issues raised by SWOI is demonstrated through the lack of evidence of any co-operation between Horsham and Crawley. Each Authority has been developing its own evidence to identify its needs and this attempt to address it within its own boundaries, without taking account of the relationship and connections between settlements on the edge of Horsham and Crawley.

Land West of Ifield will have a close connection with Ifield, much of which is in Crawley, as well as wider Crawley itself. The evidence which supports the allocation takes little account of the needs of Ifield or wider Crawley. Evidence for open space is not cross boundary, there are no cross-boundary strategies for sustainable travel, addressing employment need or open space. There is no statement of common ground between Horsham and Crawley which agrees a strategy which could deliver HA2 without resulting in significant harm to existing residents much of whom reside in Crawley.

The regulation 19 version of the Horsham plan, in particular the allocation HA2 fails to plan for sustainable development.

The **economic** objective of sustainable development is not met. The HA2 allocation will not support growth, innovation or improved productivity, because it delivers too much housing and too little employment in an area which already needs significant additional employment land.

The **social** objective of sustainable development is not met. The HA2 allocation significantly compromises existing communities access to open spaces and recreation and will require people in Crawley to have to travel greater distance to find it. The allocation fails in its aim to provide effective secondary school places for residents in Crawley because it is remote to those who need it most.



Vesey House

5-7 High Street

Sutton Coldfield, B72 1XH

office@cerda-planning.co.uk

0121 748 1620

The **environmental** objective of sustainable development is not met. The HA2 allocation will result in the loss of significant natural landscape and biodiversity networks. The allocation will through the lack of suitable, joined up transport proposals, the location of new schools, employment and retail and loss of accessible open space and recreational facilities increases the need for residents of Crawley to travel which will significantly contribute to the existing poor air quality of the area.

The allocation of HA2 will result in a development plan which **does not pass the tests of soundness** at Examination and this consultation represents the last opportunity for the Council to change direction, remove land West of Ifield from the emerging Development Plan so to avoid ongoing significant costs and delays which will result from not producing a sound Development Plan which can serve the residents of Horsham and directs the right development to the right places.



Horsham Local Plan Regulation 19 Publication Plan Policy Review

Review of Policies Relevant to:

Land West of Ifield

Save West of Ifield

Contents

1.	Introduction	1
2.	Duty to Cooperate	2
3.	Strategic Objectives & Core Policies	6
4.	Review of other Relevant Strategic Policies	11
5.	Strategic Policy HA2: Land West of Ifield	25
6.	Conclusion	32

Document Reference:

23.047

Version 3.6

Date of Issue:

28 February

2024

Prepared by:

Stuart Crossen

BA (Hons)

PgCert

PgDip

MA

MRTPI

1. Introduction

- 1.1 Cerda Planning Ltd has been instructed by Save West of Ifield (SWOI) to make representations to the Horsham Regulation 19 Publication Plan Consultation 2024.
- 1.2 SWOI welcome the production of the Horsham Local Plan and wish to support the Council in its preparation. In doing so we would like to raise concern about the strategic allocation policy for Land West of Ifield, reference HA2. Modifications will be required to the plan to address certain issues this policy raises to ensure it meets the “Soundness” tests in the Framework. In particular to express why Strategic Policy HA2 is not positively prepared, justified, effective or consistent with National Policy.
- 1.3 The new Horsham District Local Plan sets out a vision, objectives and framework for Horsham for the period from 2023 to 2040, addressing housing needs and other economic, social, and environmental priorities, assess the future levels of need, and a basis, for new homes (including market, affordable, and specialist housing), employment land, and infrastructure provision over that period.
- 1.4 The current timeline for the plan review is as follows:

Date	Local Plan Timetable
April-May 2018	Publish Issues and Options
May 2019-January 2020	Evidence Gathering
February-March 2020	Regulation 18: Public Consultation on Draft Plan
April 2020-December 2023	Regulation 19 Preparation
19 January-1 March 2024	Regulation 19 Proposed Submission and Period of Representation
June 2024	Submission
July-October 2024	Examination (Hearings to be held October 2024)
November-December 2024	Main Modifications Consultation
March 2025	Receipt of Inspector's Report

- 1.5 Before submitting a local plan to the Secretary of State under section 20¹ of the Act, the local planning authority must
- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
 - (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).
- 1.6 The next stage in the process following this consultation will be to submit the document and information to the Secretary of State.

2. Duty to Cooperate

- 2.1 Section 33A of the Planning and Compulsory Purchase Act 2004 (“the 2004 Act”) which requires Local Planning Authorities to undertake a “duty to cooperate” in relation to the planning of sustainable development. The guidance given under section 33A of the 2004 Act is also contained in the National Planning Policy Framework (the Framework) *“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic*

¹ Planning and Compulsory Purchase Act 2004

matters that cross administrative boundaries" (paragraphs 24 – 27) and further guidance is contained in the Planning Practice Guidance (PPG)².

- 2.2 The plan will not meet Horsham's housing need as calculated using the standard method in the PPG. Therefore, updated existing and new bilateral Statement of Common Ground (SoCG) agreements are required to explore the possibility of assistance from others to addressing their unmet need.
- 2.3 The North West Sussex Housing Market Area (NWSHMA) Authorities agreed and published a SoCG³ in relation to housing need in July 2023. Crawley Borough Council published their Local Plan for Examination which included a housing shortfall of 7,050. Consequently, updated SoCG's are needed to agree where the unmet need will be accommodated. This SoCG is due to be updated when examinations in public test whether in relation to local housing supply their conclusions are appropriate.
- 2.4 A statement of common ground between Horsham and the West Sussex and Greater Brighton sub-region is required to agree an approach to Horsham's unmet housing need.
- 2.5 The SoCG between Horsham District and Crawley Borough Council⁴ includes a joint position in relation to the HA2 allocation:
- Delivery of landscape led development to maintain and enhance separation between settlements and negative impacts on the setting of Crawley;

² In particular the paragraphs found under the section *"Maintaining effective cooperation"*.

³ Northern West Sussex Housing Market Area Statement of Common Ground: Housing Need July 2023

⁴ Horsham / Crawley Statement of Common Ground Horsham Local Plan Crawley Local Plan Review: Regulation 19

-
- Being of a comprehensive and strategic design to ensure infrastructure needs are provided for;
 - Should seek to achieve a level of sustainability and deliver net zero carbon emissions;
 - Working together (including with West Sussex County Council) to ensure the delivery of a comprehensive transport strategy that includes commitment to the delivery of the Crawley Western multi-modal corridor from the A264 to the A23;
 - Provide for educational needs arising from the development and for wider unmet educational needs;
 - Provide for health provision and to ensure that the design encourages healthy lifestyles; and
 - Open space, sport and recreation provision is provided to meet needs.

2.6 A SoCG is required with other authorities to set out an agreed approach to meeting Horsham District Councils unmet Gypsy and Traveller need. From the Duty to Cooperate Statement dated January 2024 it is not clear if Horsham District Council has agreed SoCG with all of the relevant Authorities, however it expects to have these in time for the examination.

2.7 A Statement of Common Ground exists with Brighton & Hove City Council which identifies their unmet employment needs and seeks support from Horsham District should a future plan be able to identify opportunities to meet Brighton & Hove City Councils unmet need. The plan has no provision to meet unmet employment need elsewhere.

2.8 A SoCG⁵ exists between Horsham District and West Sussex County Council, dealing with Local Plan periods and governance, Housing need, Gypsy and

⁵ Mid Sussex District Council: Site Allocations Development Plan Document February 2020

Traveller Accommodation, Employment – strategy and sites, Settlement hierarchy, Strategic growth West of Crawley, Gatwick Airport, Education. With respect to the HA2 allocation there is joint working with Homes England on a masterplan to ensure appropriate provision and upfront phasing of infrastructure prior to occupancy, an appropriate housing mix, bio-diversity net gain and a sustainable transport strategy and delivery plan. It also seeks continued working together on the future provision of a possible new western link road, that would provide a multi-modal transport corridor link equipped with sustainable transport infrastructure.

- 2.9 A SoCG has been signed with neighbouring authorities and endorsed by Natural England, The Environment Agency and Southern Water with regard to Water Neutrality which requires “The focus of future water neutrality work is the establishment and deployment of a joint water neutrality offsetting scheme within the WRZ which can be accessed by developers to demonstrate that their proposals are water neutral and enable them to come forward. Developers will still be able to utilise other offsetting measures, should they choose to do so.”⁶ Strategic Policy 9 Water Neutrality requires that new residential development is restricted to 85 litres of mains supplied water per person per day and that there is no net increase in mains-supplied water use than compared with pre-development levels.
- 2.10 These representations identify several conflicts within the Plan both in terms of legal and procedural requirements which combined with a lack of up to date SoCG's with all relevant Local Authorities should be judged to render that the duty to co-operate has not been complied with and that the Plan is 'unsound'. Consequently this is a strategy which is not positively prepared or justified. We

⁶ Sussex North WRZ Statement of Common Ground July 2023

have outlined numerous SoCG's which are acknowledged to be required or updated, thus deferring several issues.

3. Strategic Objectives & Core Policies

Background

- 3.1 The Framework, which underpins every local authority's Development Plan, maintains that the planning system is plan led.
- 3.2 The policies in the original National Planning Policy Framework published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019.
- 3.3 Plans submitted after this date, but which reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage before 20 March 2024, will be examined under the September 2023 version of the Framework. The Horsham Local Plan is subject to this transitional arrangements as set out in the appendices of the December 2024 version of the Framework.
- 3.4 Where plans or strategies are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan or strategy produced for the area concerned.
- 3.5 In the *Reforms to national planning policy report: government response* Published 29 November 2023 prior to the revised Framework, it was stated that plan-makers have until 30 June 2025 to submit their local plans and all existing legal duties and requirements, including the duty to cooperate, will still apply.

-
- 3.6 In terms of plan preparation, the Framework and the PPG set out robust guidance for local planning authorities to follow, the most relevant set out in the subsequent paragraphs.
- 3.7 Paragraph 15 of the Framework states that succinct and up-to-date plans should provide a positive vision for the future of each area and serve as a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 3.8 Paragraph 17 sets out that the Development Plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area.
- 3.9 Paragraph 31 maintains that a plan should be underpinned by relevant and up-to-date evidence, including a Sustainability Appraisal that meets the relevant legal requirements. The key steps are establishing a baseline of facts and trends about an area, scoring against potential impacts from the plans policies and noting mitigation and assessing alternative strategies.
- 3.10 The PPG puts forward that a local planning authority must complete a review of the plan document every 5 years from the date of its adoption.⁷
- 3.11 In relation to the examination of plans, paragraph 35 states that they are found 'sound' if they are:

⁷ Paragraph: 062 Reference ID: 61-062-20190315, Revision date: 15 03 2019

Positively prepared - providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- a) Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- b) Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- c) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

3.12 The Framework stresses that authorities should objectively identify the housing, business and other development needs of an area responding positively to opportunities for growth within an area taking account of market signals such as land prices and housing affordability. It goes on to advise that this information should advise Local Plans by setting out a clear strategy for allocating land for such development.

3.13 In relation to plan-making the Framework is clear that the plan is the key to delivering sustainable development and all planning decisions must accord with the adopted Plan. Plans should identify and set out the strategic priorities for an area by planning positively to provide housing, retail, leisure and

commercial development. This is encouraged through the allocation of land being identified as suitable for such development.

3.14 These allocations should be based on an adequate, up-to-date and appropriate evidence base including relevant market and economic signals which assess the role and function of each settlement and the capacity of these to accommodate new housing and employment growth.

3.15 In relation to housing, the Framework sets out that local authorities should have a clear understanding of the housing needs within their area. The Framework goes on to state that local authorities should prepare a Strategic Housing and Land Availability Assessment to fully understand the housing needs for the area and, where necessary, work across administrative boundaries to identify the scale and mix of housing that is required to meet the needs of the local population over the Plan period. The standard method is a starting point, and the Framework allows for alternative assessments of need, subject to justification and exceptional circumstances.

3.16 Such assessments should ensure that the housing needs of all different groups of society are catered for and that the scale and supply of housing is necessary to meet this demand during the plan period.

Strategic Policy 1: Sustainable Development

3.17 This is a model policy which sets out the principles of sustainable development and is similarly used in many development plans.

Strategic Policy 2: Development Hierarchy

3.18 Ifield is listed here as a secondary settlement “Very small villages and hamlets that generally have some limited local employment, services or facilities (which may include primary schools, allotments, village halls, playing fields, or a

church) and/or evidence of a defined local community. Proximity and access to other services, facilities and employment is also taken into account. Additionally, settlement character is material, for example form, density, age and historic character of dwellings, and the overall sense that one has left the open countryside and entered a defined village community." This is an accurate description of Ifield and highlights how unsuitable a large allocation here would be and contrary to the sustainable principles set out in Strategic Policy 1. This hierarchy is a guide for developers to understand which are the most accessible areas and where development is prioritised. *"Within built-up area boundaries and secondary settlement boundaries ('SSB'), development is accepted in principle, whereas land outside these boundaries is considered to be in the countryside and development will be more strictly controlled."* On the contrary this demonstrates that the plan is allocating sites in less accessible areas and in the Countryside where there are more strict controls.

Strategic Policy 3: Settlement Expansion

- 3.19 The policy recognises that there will be settlement growth through allocation in the local plan, such as Land West of Ifield.
- 3.20 Part 2 of the policy "The level of expansion is appropriate to the scale and function of the settlement type;" appears to conflict with the allocation HA2 Land West of Ifield. 3000 new homes in an area with a population of 10,000 would not be appropriate in scale, contrary to the existing settlement character in terms of form, density, age and historic character of dwellings, and would result in the loss of any existing overall sense that "one has left the open countryside and entered a defined village community".

4. Review of other Relevant Strategic Policies

Strategic Policy 6: Climate Change

- 4.1 Part 1 e) states “Using patterns of development and providing sustainable transport infrastructure which reduce the need to travel, encourage walking and cycling and include good accessibility to public transport and other forms of sustainable transport and ensure residents have access to services and facilities that are within walking distance” and is contrary to the justification for policy HA2 which is expected to provide schools to serve Crawleys educational needs which will encourage travel to and from the allocation area. The first phase includes no highway improvements. It is recognised that by providing services and facilities within the allocation you can reduce the need to travel for those occupying the new properties, but the location of services and facilities in a remote area to serve Crawley residents will increase the need for people to travel who live and have children in Crawley.

Strategic Policy 9: Water Neutrality

- 4.2 All development in the Sussex North Water Resource Zone, which includes HA2, under this policy will be required to demonstrate water neutrality. “New residential development is designed to utilise no more than 85 litres of mains supplied water per person per day”. To achieve this, it is likely that water reuse would be required. The Eddington development near Cambridge achieves about 80 mains supplied water per person per day based on use of a community scale rainwater harvesting system coupled with a dual pipe supply network.
- 4.3 The Independent review of the costs and benefits of rainwater harvesting and grey water recycling options in the UK Final Report for Waterwise states that *“The costs of installing a rainwater harvesting system are relatively constant and vary between £10,000 and £60,000 depending on the size of the tank and*

system required, this includes both the upfront costs and ongoing maintenance costs (over a 20 year lifetime).”⁸

- 4.4 The policy needs to ensure that water neutrality is secured for as long as it is required. The policy should require that landowners will need to enter a legal agreement to install and retain the measures in perpetuity.
- 4.5 The viability study has calculated water efficiency costs per unit to be £2000, stating that this is relatively minor and can be easily absorbed across all sites. This might be a reasonable estimate in other Authorities, but water neutrality is a significant issue for the Horsham Plan and the viability study has not taken account of this.

Strategic Policy 10: Flooding

- 4.6 “The River Mole flows in a north-westerly direction through Reigate and Banstead in the north portion of the study area. The River Mole discharges into the River Thames between East Molesey and Thames Ditton.”⁹ A watercourse from the River Mole flows through the HA2 allocation and is identified in the study as being poor quality and is already subject to flood zone 3 designation.
- 4.7 The British Geological Survey Observatory SuDs research and they make clear that SuDs only alleviates issues and the effectiveness is reliant on geology which for HA2 the area is predominantly clay. “For infiltration-based SuDS to drain effectively, the topsoil and the underlying geology need to be free draining. Sands and gravels, for example, are generally more permeable than silts and clays. Free-draining superficial or bedrock deposits generally have higher porosities and hence more space to provide storage capacity. Percolating water from SuDS schemes can cause a temporary rise in groundwater level as

⁸ Independent review of the costs and benefits of rainwater harvesting and grey water recycling options in the UK Final Report for Waterwise.

⁹ Gatwick Sub-Region Water Cycle Study Final Report August 2020

pore space fills with water. The unsaturated zone (the zone above the groundwater table) must be thick enough to accommodate this groundwater level rise."¹⁰

- 4.8 Development to deliver HA2 is significant, it not only includes the proposed housing development but also other services and facilities and transport infrastructure. Maintaining water quality is unlikely to be achieved contrary to the requirements of this policy due to the geology, the amount of hard surfacing and vehicular traffic which will result in at least some surface water discharge (notwithstanding use of Sustainable Urban Drainage, SuDS) into watercourses lowering the quality.

Strategic Policy 11: Environmental Protection

- 4.9 Section 6 of this policy states "Minimise air pollution and greenhouse gas emissions in order to protect human health and the natural environment" and section 7 "Contribute to the implementation of local Air Quality Action Plans and do not conflict with their objectives." The Strategic allocation HA2 is likely to conflict with these elements because of the traffic it is likely to generate between the allocation and Crawley, in particular where the development will contribute to services and facilities required for Crawley residents.

Strategic Policy 12: Air Quality

- 4.10 For development of strategic allocations such as HA2 to accord with this policy highway infrastructure improvements are required.
- 4.11 "Minimise traffic generation and congestion through access to sustainable transport modes, maximising the provision for cycling and pedestrian facilities;"

¹⁰

<https://www.bgs.ac.uk/geologyprojects/suds/#:~:text=By%20mimicking%20natural%20drainage%20regimes,pollution%20to%20the%20water%20environment.>

Because of the scale of the allocation, access, provision and facilities are required outside of the allocation site and specifically within Crawley, existing connections are poor with narrow roads such as Rusper Road, Ifield Green and Ifield Wood, additionally one of the wider highway routes between Crawley and the allocation would be Ifield Avenue, but even this road only has a footpath on one side. With the increased traffic of up to 3000 new houses, it is hard to imagine occupiers will be encouraged to cycle or walk on any of these roads.

Strategic Policy 13: The Natural Environment and Landscape Character

- 4.12 The Horsham District Landscape Capacity Assessment in respect of Ifield Golf Course states that "Enclosure within the area is provided by woodland and hedgerows, but housing and particularly employment development could, if extended onto higher land in the centre of the golf course be visually prominent from the surrounding countryside to the north". With respect to Land West of Ifield Brook it states "Overall there is an open character, visible from the wooded ridge to the west but the area is partly enclosed by belts of woodland and thick hedgerows along Ifield Brook giving moderate visual sensitivity to housing development".
- 4.13 The assessment for Ifield Golf Course does not take full account of public footpaths and incorrectly states that "The golf course is privately run which limits public access to the land but there is a public footpath that runs adjacent to the north and eastern boundaries" Footpath 1549_2 actually runs partly through the Golf Club.
- 4.14 The assessment for Land West of Ifield Brook makes no mention of footpath 1541 which runs through the assessment parcel.

-
- 4.15 These omissions are important when considering Landscape Value because these routes are used by existing residents of Ifield and provide the Countryside character which defines the area and which contributes more than a “Low to Moderate” Landscape value.
- 4.16 The definition of “Low to Moderate” landscape value is set out in table 1 of the assessment “The majority of the landscape characteristics/features are less likely to be sensitive to this development type. Although development can potentially be more easily accommodated care would still be needed in locating and designing development in the landscape.” It is hard to imagine that housing development and retail would not conflict with the existing character and features of the area, defined by open leisure uses, agriculture and open countryside.
- 4.17 The assessment recognises in the methodology “that in some local landscape areas, certain landscape features/qualities will be more important than others in different areas, for example as a result of the contribution they make to the specific character of an area”. Leisure uses are often found on the edge of the urban area because they are accessible and are in demand by residents. These uses are generally more open with a low density of built development which provides the transition between the urban and open countryside. These are some of the most sensitive areas to development because there are experienced by many people. Both the Golf Club and the footpaths combined with its edge of urban area location are significant factors for consideration, which the Landscape Assessment has not given sufficient weight to.
- 4.18 In relation to this Policy, HA2 would conflict with the requirement for development to “Protect, conserve and enhance the landscape and townscape character, taking into account features / areas identified as being

of landscape importance and the individual settlement characteristics, and maintain settlement separation”.

Strategic Policy 14: Countryside Protection

- 4.19 “Outside built-up area boundaries and secondary settlements, the rural character and undeveloped nature of the countryside will be protected against inappropriate development.” Most of the HA2 allocation is outside of the secondary settlement. The policy includes a list of exceptions:
- a) Support the needs of agriculture or forestry
 - b) Enable the extraction of minerals or the disposal of waste;
 - c) Provide for quiet informal recreational use; or
 - d) Enable the sustainable development of rural areas.
- 4.20 The allocation would not meet any of the exceptions. Furthermore, the policy requires that “all proposals must be appropriately integrated within the landscape and be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, conserves, and seeks to enhance, the key features and characteristics of the landscape character area in which it is located”.

Strategic Policy 17: Green Infrastructure and Biodiversity

- 4.21 This policy has the potential to severely restrict development at HA2 especially where the Golf Club currently is. The policy will require the retention or replacement of any lost trees. Development of the allocation is unlikely to result in any net gain to green infrastructure or biodiversity.
- 4.22 This concern is confirmed in the viability study for allocation HA2 which states that “this site may require offsetting of biodiversity enhancements to achieve

the Council's policy requirement of 12% net gain." There are no details for where Biodiversity Net Gain would be off-set to, in particular if the loss of the Golf Course could be justified this area would be a optimal location for biodiversity credits with a high potential biodiversity uplift, without resulting in the loss of important agricultural land.

Strategic Policy 23: Infrastructure Provision

- 4.23 The Save West of Ifield group have previously made representations against the allocation of Land West of Ifield for housing, amongst other things with respect to issues of traffic, inadequate public transport and its resulting pollution. Policy HA2: Land West of Ifield proposes 1600 homes over the plan period, 3000 allocated with the future potential to deliver 10,000 homes.
- 4.24 The district falls within The Northern West Sussex Housing Market area which includes Crawley Borough and Mid Sussex District. Within the Horsham boundary there are few services and facilities which would serve the proposed allocation which is why policy HA2 seeks to provide all of the services and facilities which may be required by future residents.
- 4.25 In addition to new housing, other development is proposed: a community, employment and transport hub to include a library, community centre, and potentially café and/or public house and indoor sports facilities, 3,300 sqm of retail space, 2.0 ha of employment floorspace to incorporate an enterprise and innovation centre, two 2-form entry primary schools, an 8-form entry secondary school, to incorporate support centres for special educational needs (SEND) and meet existing education needs in Crawley; two new full-day care nurseries, an education, skills and innovation facility, and the appropriate provision of land, buildings and/or financial contributions for NHS provision.

-
- 4.26 This significant level of development is supported in the policy by the requirement for a comprehensive transport strategy to be submitted as part of a masterplan and that no development shall occur within a safeguarded area of search as shown on the Policies Map that may prejudice a full Crawley Western multi-modal corridor from the A264 near Faygate to the A23 south of Gatwick, north of County Oak. The policy recognises that a proposal for 3000 homes is unlikely to be able to deliver a full Crawley Western multi-modal corridor that connect the A264 at Faygate to the A23 south of Gatwick Airport, north of County Oak.
- 4.27 For the plan to be effective it must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 4.28 With regard to transport infrastructure needs, the Northern West Sussex Statement of Common Ground: May 2020 stated that "The Northern West Sussex Authorities are in agreement that transport infrastructure required to deliver development in the north of the area is a significant constraint over the lifetime of the respective plans. The three councils will continue to share information as transport studies are updated and will work together where necessary to resolve any cross-boundary issues alongside the LEP, West Sussex County Council or the Highways Agency." Specifically with regard to Transport they agreed "Transport, including with reference to maximising opportunities for sustainable and active travel: Public Transport – rail station, Metrobus extensions, cycling, walking, equestrian, public rights of way; and exploring further the need for, and, if so, opportunities to secure the implementation of, a Crawley Western Link Road. Transport studies are currently under way to identify transport mitigation strategies for Horsham and Crawley Local Plans and for the Mid Sussex Development Plan Document."

-
- 4.29 Page 49 of the Crawley Infrastructure Plan May 2023 (CIP) reports “The Study includes sensitivity testing for the impact of a Crawley Western Link Road / Multi-modal Transport Link between the A264 and A23. This finds that the Link would provide some relief at most locations under Scenario 3, with the western minor roads being the main beneficiaries. This testing does not take into account development to the west of Crawley exceeding that considered in Scenario 3 (i.e. West of Ifield (3,750 Dwellings) and West of Kilnwood Vale (1,546 dwellings).” It also recognises that “Existing capacity issues on roads within Crawley will potentially be exacerbated due to the cumulative impact of additional major development which is being promoted to the west of Crawley, and the significant growth in passenger numbers which is anticipated in Gatwick Airport’s draft Master Plan.”
- 4.30 The CIP identified future studies and plans which includes “The updated Local Plan identifies an area of search within Crawley to potentially form part of a full Western Link Multi-Modal Transport Corridor connecting the A23 with the A264 in Horsham District to the west, to address existing congestion and additional anticipated growth. This is supported by an initial options study. Further feasibility studies will be needed to identify and progress a specific route.”
- 4.31 With regard to funding the CIP suggests that development will contribute to the infrastructure necessary to support them via S106 planning obligations as set out by CIL.
- 4.32 Having recognised that there are existing capacity issues, this document does not make clear how CIL contributions to highway infrastructure would ensure that developers would be contributing to solutions to address existing infrastructure issues.

4.33 Since the 2020 SoCG there has been no conclusion to the question of joint highway infrastructure requirements. The Transport Study¹¹ prepared for the Crawley Local Plan considered a modelled scenario (scenario 3) which included 3750 houses West of Ifield and concluded:

“In Scenario 3 flow increases are predicted on the minor roads to the west of Crawley, including Rusper Road, Ifield Green, Ifield Avenue and Ifield Drive, reflecting the proposed West of Ifield and Kilnwood Vale developments located in Horsham District. Capacity constraints on Crawley Avenue are likely explain the use of the minor roads. Increases in flows are also evident in Scenario 3 on Ifield Avenue on the approach to Crawley Avenue, mainly due to the proposed West of Ifield development. This would be expected to put pressure on junctions along Ifield Avenue particularly at its junction with Crawley Avenue. A sensitivity test that considers the potential network impacts of a Crawley Western Link Road (CWLR) as part of mitigation for Scenario 3, is reported in Section 9”.

Section 9 concludes “The overall conclusion is that the scheme provides relief to the minor roads to the west of Crawley such as Faygate Lane and Rusper Road, but it does not relieve traffic flows in Crawley sufficiently to mitigate the impacts of Scenario 3 Local Plan to levels similar to or better than the Reference Case.” The reference case was as follows:

“The Reference Case has been defined to include the following:

- Completions (2015 – 2020).
- Unbuilt consented development on allocated sites.
- Unbuilt consented development on other sites.

¹¹ Crawley Transport Study Transport Study of Strategic Development Options and Sustainable Transport Measures Draft Crawley Local Plan 2021 - 2037

-
- Strategic consented development in neighbouring areas, such as remaining build out for Kilnwood Vale (Horsham District Council) and Land West of Copthorne (Mid Sussex District Council).
 - Allocation sites in neighbouring planning authorities, such as Horley Business Park (Reigate & Banstead Borough Council)"
- 4.34 The 3750 housing figure which was modelled was slightly higher than the 3000 proposed in this plan, however policy HA2 will not deliver the full Crawley Western multi-modal corridor which the Crawley Transport Study indicates would not fully mitigate traffic impacts.
- 4.35 The Planning Practice Guidance sets out that "strategic policy-making authorities are expected to document the activities undertaken when in the process of addressing strategic cross-boundary matters whilst cooperating, and that effective cooperation enables strategic policy-making authorities and infrastructure providers to establish whether additional strategic cross-boundary infrastructure is required". Furthermore, the guidance states "Authorities which agree to take additional housing from other areas may in turn require investment in infrastructure provision to support this. Where effective cross-boundary working can be demonstrated in the statement of common ground, this could be used as evidence when trying to secure grants for infrastructure where effective joint working forms part of the assessment criteria."
- 4.36 In support of the regulation 19 version of the plan there is a new Statement of Common Ground between Horsham and Crawley. Particularly relevant to the West of Ifield allocation is paragraph 7.3 (f):

“Given potential cross-boundary impacts, the parties agree that the following key objectives would be pursued in any policy formulation should HDC decide to allocate the site, and in any discussions with the site promoter:

f) The parties will work together, with the Highways authority to ensure that any masterplan prepared by the site promoter secures an effective transport strategy to serve the development.

This will deliver a multi-modal sustainable transport route that delivers active travel options and mitigates adverse impacts of traffic flow into Crawley. The new route must not be an obstacle to the delivery of a comprehensive new corridor link to the west of Crawley, that would connect the A264 near to Faygate to the A23 north of County Oak.

Both HDC and CBC will continue to work jointly to seek a clear commitment from Homes England or other appropriate government bodies to the full delivery of the sustainable transport corridor link to support the scale of development proposed in any allocation. To support such a commitment this will include any necessary safeguarding of land within respective Local Plans, and consideration of funding models including developer contributions. The parties are engaging with WSCC and Gatwick Airport regarding the boundaries of safeguarding, especially in the vicinity of the multi-modal sustainable transport corridor link along the southern boundary of the airport.”

- 4.37 There is no agreement of investment from Crawley to support any infrastructure provision and the Regulation 19 version of the plan states in paragraphs 10.12 and 10.13 that Horsham cannot contribute to meeting Crawley's housing needs, only that through the delivery of development at Land to the West of Ifield a new school can be provided to support economic growth. As a paper exercise it can be stated that this allocation only contributes to Horsham's

housing supply, which, as set out by the Standard Method Horsham is unable to meet. However, if we consider the relationship of this housing allocation and Crawley it is undeniable that they are geographically linked and that they will be dependent on one another for shared facilities, services, and employment and as such the allocation contributes to the housing needs of Crawley more than any existing need within the existing settlements of Horsham in particular Ifield. More significant will be the relationship between Land West of Ifield and the existing transport Infrastructure much of which is in Crawley is already unable to support existing urban development in Crawley.

- 4.38 The plan does not address the necessary transport infrastructure needs of the allocation Land West of Ifield. Duty to Co-Operate has not provided any significant joint solutions for managing transport infrastructure impacts cross boundary. The plan denies that the West of Ifield allocation meets the need for housing in Crawley. The houses in the allocation are not all deliverable during the plan period and highway mitigation such as the Crawley Western multi-modal corridor that connect the A264 at Faygate to the A23 south of Gatwick Airport, north of County Oak is not dealt with and has been deferred. As such the plan is not Effective and fails one of the tests of soundness.

Strategic Policy 24: Sustainable Transport

- 4.39 Section 1a) to 1d) of this policy would all relate to connectivity and sustainable transport within the allocation HA2. One of the key issues with the allocation is how inaccessible the allocation is in relation to the main urban area of Crawley. Section 1e)" All opportunities have been explored to maximise access to passenger rail services, primarily by walking, cycling and bus, but if appropriate by private car including the enhancement of rail station car parking where feasible" is particularly ineffective and will not address the concerns with HA2.

4.40 Section 1f) is similarly ineffective because it only requires innovative approaches to sustainable development to be “considered” so developers could explain why approaches were considered but discounted.

5. Strategic Policy HA2: Land West of Ifield

- 5.1 Already from the review of other policies in the plan, allocation HA2 has many issues and policy conflicts to navigate. The geographic location appears to be sustainably located near to Crawley. However, the existing highway infrastructure is not sufficient to serve expansion which means the allocation will be isolated from services and any travel will have impacts on the highway network and air quality. The allocation is largely undeveloped with a Golf Course taking a significant proportion, having an effect on existing significant planting and ecosystems. There are water neutrality constraints, surface water risk, a lack of sewage capacity, healthcare provision and no existing remaining education provision which could accommodate new development here.
- 5.2 As a result of this long list of constraints and issues policy HA2 spans 4 pages, the longest list of requirements of any of the Strategic allocations in this plan. Although the allocation is for a total of 3000 houses only 1600 can be delivered initially because of the prohibitive costs of required junction improvements outside of the allocation. This is a risk to delivery because the viability study has not taken account of all of the costs (as covered elsewhere in this report). The delivery of infrastructure is referred to in the viability study as onerous cash flow requirements which will be managed by Homes England, thus deferring the issue and allowing a favourable viability study outcome which risks only 1600 houses being delivered.
- 5.3 Plans should “be prepared positively, in a way that is aspirational but deliverable”. The Framework also provides guidance as to the definition of deliverable as follows “Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development

now, and be achievable with a realistic prospect that housing will be delivered on the site within five years”

- 5.4 A gateway constraint to allocating sites that are deliverable in any development plan is whether there are willing landowners. In paragraph 8.120 of the Horsham Local Plan Viability Assessment November 2023 it is stated that “During our consultation, the promoter confirmed that parcels have since been acquired, taking the total proportion of land under control XXXX (redacted) Negotiations with smaller land parcels are said to be ongoing but the promotion team are confident that these will be completed by the time of the Local Plan examination.” The promoter does not or did not have control of all of the land in the draft allocation at the time of the viability study and at the time of this consultation the proposal is not deliverable. Although Homes England do have compulsory purchase powers since 2017 a Freedom of Information request in 2023 by Inside Housing¹² revealed that these powers had never been used.
- 5.5 Furthermore, the viability testing for this site has been done without knowing the final costs of land acquisition which casts some doubt as to the findings of the viability study.
- 5.6 A key justification for the draft allocation is the delivery of the Crawley West Multi-modal Corridor. The viability study has identified that to deliver this upfront, raises potential cash flow issues. “The promoter states that there is an opportunity to manage these through unique delivery models with service providers and Homes England role as master developer. Evidence can be provided where onerous cashflow requirements are being managed by Homes England in its capacity as master developer.” Homes England have reported

¹² <https://www.insidehousing.co.uk/news/homes-england-has-never-used-the-cpo-powers-it-was-granted-six-years-ago-81492>

a number of missed targets this year which are relevant to their role as master developer. Homes England said it completed just 40% of the homes it intended to deliver through activity to unlock housing capacity linked to infrastructure projects. It said the agency's 'unlocking of housing capacity' is heavily reliant on a small number of large-scale infrastructure projects. It said: "The inherent uncertainties facing infrastructure projects have been exacerbated by elevated levels of inflation, supply chain issues and local authority capacity constraints." In addition, Homes England were criticised last summer in a BBC article regarding their development at Northstowe which lacked services and facilities and where it was reported that 76% of residents were fairly or very dissatisfied¹³, much of these issues were around phasing which is a key consideration of this policy, at what point are services and facilities required?.

- 5.7 The viability study took account of the following provisions: *Up to 3,000 homes including 35% affordable housing (40% in policy HA2); Promoter has identified land area for 15 Gypsy and Traveller pitches; Development will deliver workspaces for start-up and intermediate businesses and land for employment which complements existing offer at Gatwick Airport; Intention to deliver an enterprise/innovation centre; Proposals would seek to ensure there is access to high levels of public transport, including an expansion of the Crawley Fastway system; This element of the scheme would provide the first phase of a wider western link road from the A264 to the A23; A new primary school and land for a secondary school. Schools would provide for SEND and nursery / pre-school provision (Policy seeks 2 Primary schools); Neighbourhood centre would provide a hub for the community, including retail space, community space and leisure; 85 hectares of open space; The Promoter has indicated the development would reduce its carbon footprint and ensure homes are designed to zero carbon ready to meet climate change targets.*

¹³ <https://www.bbc.co.uk/news/uk-england-cambridgeshire-66156561>

-
- 5.8 Policy HA2 also requires the delivery of local healthcare facilities which as a minimum, meet the needs of the new occupants of the development. This may include the appropriate provision of land, buildings and/or financial contributions. This is not accounted for in the viability study.
- 5.9 The policy also requires “the provision of appropriate mitigation for loss of Ifield Golf facilities will be required in the absence of site-specific evidence demonstrating the surrounding area has capacity to accommodate its loss.” The costs for the requirement are not accounted for in the viability study and could be a significant barrier to development.
- 5.10 The allocation is not proved to be deliverable, not all of the land is in the ownership of the land promoter and the viability study did not take account of the provision of an additional Primary School, the provision of healthcare facilities or the mitigation requirements for the loss of Ifield Golf facilities. There is no evidence or information to provide assurance that the upfront requirements of the Crawley West Multi-modal Corridor can be delivered.

Provision of a Secondary School and delivering the education needs of Crawley

- 5.11 The allocation introduction for HA2 explains that education issues have been identified. It later explains, “Once completed, development to the West of Ifield will form part of the wider urban form of Crawley. Therefore, any development which takes place in this location will require close and ongoing discussions with Crawley Borough Council. There are strong opportunities to support economic growth in the area and deliver education needs arising in Crawley as well as from the new development.”

5.12 Paragraph 3.15 of the Duty to Cooperate Statement January 2024 also states "A key element of the current 3,000-home proposal is inclusion of land for a new secondary school which is needed to meet pressing unmet school places demand from Crawley Borough (which has committed funding from the Department for Education)."

5.13 Crawley has 6 existing secondary schools:

Name	Location	Distance from Ifield Golf Club	Number of Pupils	Capacity
Hazelwick School	51°7'30.51"N 0°9'54.11"W	3.3 miles	1879	1886
Holy Trinity Church of England	51°6'20"N 0°12'35.02"W	1.8 miles	1320	1308
Ifield Community College	51°7'3.55"N 0°12'36.25"W	1.8 miles	1202	1250
Oriel High School	51°6'21.22"N 0°9'30.78"W	4.8 miles	1469	1450
St Wilfrid's Roman Catholic School	51°6'37.41"N 0°12'14.86"W	2.2 miles	1061	949
Thomas Bennet Community College	51°5'56.82"N 0°11'25.11"W	2.7 miles	1257	1450
Total			8188	8293

-
- 5.14 Overall Crawley Schools have capacity to serve the current need of Crawley, and those schools with the least capacity are location furthest away from the Land West of Ifield. A school located at Land West of Ifield would not deliver the education needs of Crawley because it is located too far away from the areas which need additional provision.
- 5.15 Based on DfE's national average pupil yields and 2022/23 average school sizes for England, the typical demand generated by new homes is equivalent to one average sized primary school per 1,104 new homes and one average sized secondary school per 8,107 new homes.
- 5.16 The Education Act 1996 sets out statutory the "walking distance" to a school, in relation to a child who is under the age of eight, means 3.218688 kilometres (two miles), and in relation to a child who has attained the age of eight, means 4.828032 kilometres (three miles).
- 5.17 The allocation of just 1600 houses in the plan does not justify the proposed provision of schools and certainly a new secondary school cannot be justified for 3000 houses. Furthermore, due to their location, they would be too remote to serve any of Crawley's education needs, including those as a result of new housing development which has predominantly taken place in the North East of Crawley, some distance from Land West of Ifield with few options for using public transport. As a consequence, these new schools would encourage travel between Crawley and Land West of Ifield which is likely to be significant at certain times of the day. The result would mean that any Air Quality Impact Assessment and comprehensive Air Quality Strategy as part of a proposal would be likely to conclude that such an impact could not be mitigated for. The very limited proposed travel improvements proposed in HA2 are also

unlikely to mitigate the level of additional traffic these facilities could generate and, in particular, for the first 1600 houses there would be no road improvements at all.

6. Conclusion

- 6.1 The Framework requires that local plans are examined to assess whether they have been prepared in accordance with the legal and procedural requirement. Plan must meet the tests of soundness which are:
- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 6.2 Duty to cooperate is not met contrary to the tests of soundness with too few SoCG agreements in place, or are underdeveloped, ensuring that unmet need from Horsham and other surrounding authorities are not accommodated.

-
- 6.3 The allocation is contrary to the policies within the plan for Secondary settlements.
- 6.4 The decision to allocate HA2 is based on a Landscape Assessment which does not account for all the associated parcel features relevant to the assessment.
- 6.5 The allocation is not proved to be deliverable, not all of the land is in the ownership of the land promoter and the viability study did not take account of the provision of an additional Primary School, the provision of healthcare facilities or the mitigation requirements for the loss of Ifield Golf facilities. There is no evidence or information to provide assurance that the upfront requirements of the Crawley West Multi-modal Corridor can be delivered, which in any case may not mitigate for the increase in traffic.
- 6.6 The allocation of just 1600 houses in the plan does not justify the proposed provision of schools and certainly a new secondary school cannot be justified for 3000 houses, and they would be too remote to serve any of Crawley's education needs.
- 6.7 New schools, delivered by the allocation would encourage travel between Crawley and Land West of Ifield which is likely to be significant at certain times of the day. The result would mean that any Air Quality Impact Assessment and comprehensive Air Quality Strategy as part of a proposal is likely to conclude that such an impact could not be mitigated for.
- 6.8 The very limited travel improvements proposed in HA2 are also unlikely to mitigate the level of additional traffic as a result of the allocation.
- 6.9 For these reasons the regulation 19 version of this plan is not considered would lead to a sound plan for examination and a revised strategy is required to

locate housing development in more sustainable locations than proposed in this plan and where existing unmet housing need exist outside Horsham and as proposed by this plan within Horsham, statement of common ground should be agreed and signed between relevant Local Planning Authorities.



Horsham Local Plan Regulation 19 Publication
Plan Spatial Strategy Review

Spatial Strategy Review

Land West of Ifield

Save West of Ifield

Contents

1.	The Vision	1
2.	Housing Strategy	4
3.	Spatial Objectives	7
4.	Sustainability Appraisal	18
5.	Conclusion	27

Document Reference:

23.047

Version 2

Date of Issue:

14 February

2024

Prepared by:

Stuart Crossen

BA (Hons)

PgCert

PgDip

MA

MRTPI

1. The Vision

1.1 The Spatial Vision is described as follows:

"A place where people from all backgrounds can choose to live and work, in a high-quality natural environment and low carbon economy with access to high quality jobs, services and facilities and green spaces that are close to home."

1.2 For Land West of Ifield, significant existing greenspace and high-quality natural environment close to the home of existing residents in Ifield and Crawley would be lost and the very limited phased infrastructure improvements proposed, would limit access to high quality jobs, services and facilities.

1.3 This Vision includes a reference to a low carbon economy, but this is secondary to the emphasis placed on providing a high quality natural environment. The vision does not prioritise the Climate Emergency.

1.4 At a Horsham District Council meeting in June 2023, councillors voted to declare a climate and ecological emergency for the Horsham District.

1.5 The Council reported that the declaration of a Climate and Ecological Emergency will strengthen and further enable the Council to move forward with its carbon neutral agenda, enabling it to achieve its own carbon neutral target for 2030 and the Horsham District carbon neutral target for 2050. Furthermore, that the Climate and Ecological Emergency status in particular would add robust support to a number of planning policies within the Council's Local Plan development.

The aims included:

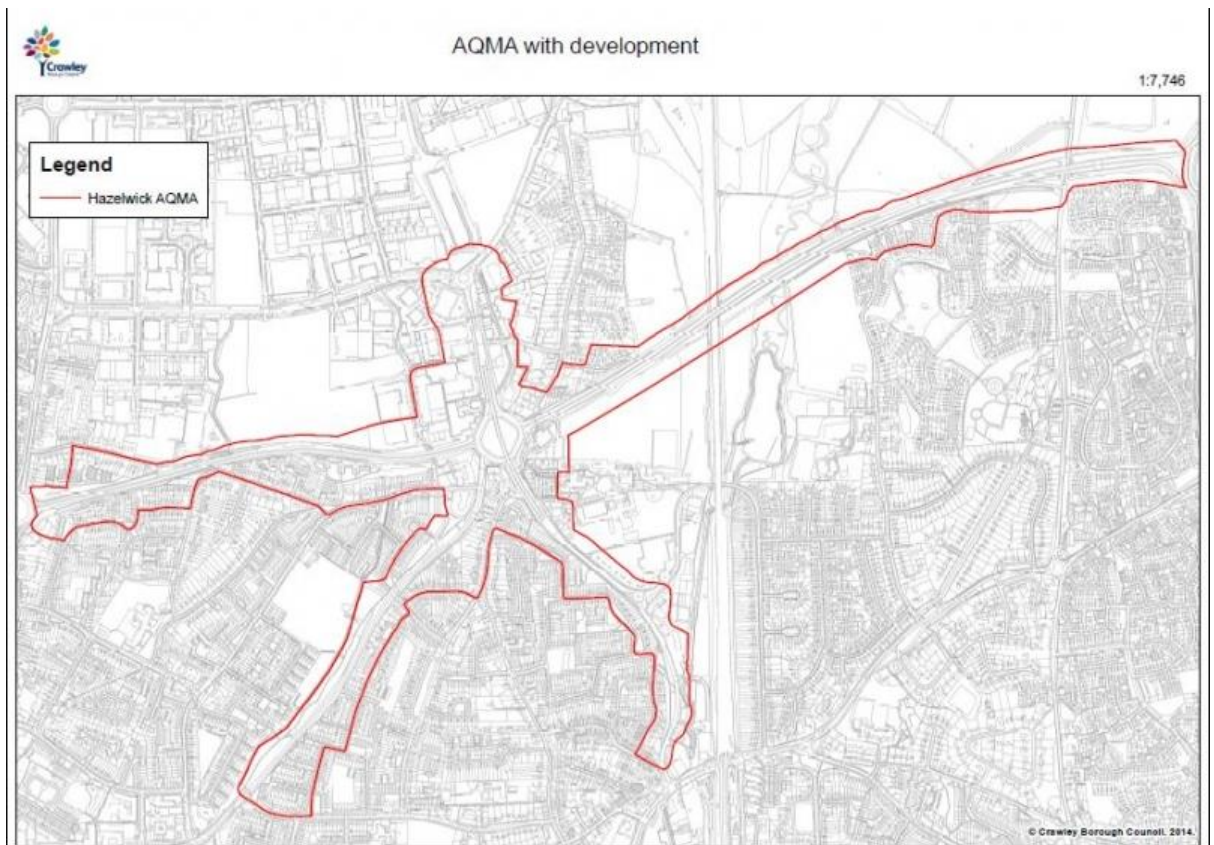
- Minimise carbon emissions by ensuring new developments are designed and constructed in such a way that helps achieve net zero carbon emissions.
- Deliver more substantial climate change mitigation and adaptation, taking into account increased flood risk events.
- Provide better connected habitats and more green spaces to improve the environment and help residents and businesses adapt to climate change.

1.6 The Council has produced a draft Climate Action Strategy (CAS) which outlines a recommended pathway to become a net zero and climate resilient District by 2050. The CAS recognises that the Local Plan is at Regulation 19 stage (R19) and was finalised before the CAS had got beyond consultation, it acknowledges that the R19 plan includes low carbon requirement policies but then goes on to state *"It is expected that future iterations of the Local Plan and its supporting documents will continue to tighten these requirements for new development."*, the next iteration of the Local Plan, if subject to an early review could be at least 5 or 6 years away and the spatial strategy of the plan include the allocation at Land West of Ifield (HA2) which is contrary to the short term aims of the CAS which seeks to *"update and strengthen the Council's Green Infrastructure Strategy and Greenspaces Strategy"* and *"develop a local nature recovery strategy."*

1.7 Other aims within the CAS which should be informing this strategy includes *"collaborate with the Highway Authority to improve local public transport"* and *"Implement the Horsham LCWIP, support the County Council's Cycling and Walking Strategy and maximise funding opportunities to improve cycling and walking infrastructure across the whole district."* Because the CAS has not

informed the plan there has been no opportunity for joined up policies to tackle the climate emergency and the allocation of Land West of Ifield for housing between 3000 and 10,000 with the infrastructure proposed will hinder delivery of any of the Councils Climate Emergency aims and objectives. Almost all new development increases net greenhouse gas emissions. The current policies in the Draft Plan will do little to alter that.

- 1.8 The increase in carbon emissions from the HA2 allocation will also be felt by those living in Crawley, the adjacent Local Authority (of which there exists a Statement of Common Ground) which is subject to an area designated for air quality management (Hazelwick Air Quality Management Area).



2. Housing Strategy

- 2.1 Horsham District falls within two main housing market areas. The Northern West Sussex Housing Market area covers the District as a whole, which also includes Crawley Borough and Mid Sussex District. A small area in the south-east of the District also falls within the Sussex coast housing market area. The latter housing market area primarily covers the south coast authorities of Worthing, Adur and Brighton and Hove.
- 2.2 Paragraph 10.4 of the Reg19 plan states *“It is a requirement of the NPPF that the Council provides a strategy which, as a minimum, seeks to meet the District's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. The standard methodology calculation for Horsham District in 2023 is calculated as 911 dwellings per annum. This is equivalent to providing a minimum of 15,487 homes in the 17-year period between 2023 and 2040”*
- 2.3 Paragraph 10.21 clarifies that *“The Council's evidence base work has identified a total of 13,212 homes which are considered to be deliverable in the Plan period.”*
- 2.4 The plan suggests that it will meet the unmet housing needs from other areas and, at the same time, proposes not to provide sufficient supply to meet its own needs. Paragraph 66 of the Framework states *“strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”*

-
- 2.5 It is not clear from the Spatial Strategy whether the housing supply figure is providing Horsham's identified housing need or Crawley's. Geographically, the land west of Ifield allocated for development in HA2, expands the existing settlement Ifield which is in Crawley.
- 2.6 The Northern West Sussex authorities agreed that, subject to meeting individual housing needs and establishing that there is potential to assist other authorities with unmet need, assistance will be prioritised as follows: Priority 1: Northern West Sussex HMA; Priority 2: Coastal West Sussex HMA; Priority 3: Other adjacent and nearby HMAs where it is justified by each individual authority.
- 2.7 Crawley is located within the Northern West Sussex HMA, however as the Horsham Regulation 19 plan does not meet Horsham's needs there is no need for them to assist another Authority.
- 2.8 The Spatial Strategy concludes that larger settlements "*generally have more ability to accommodate larger scale growth*". Strategic Policy 2 sets out the following hierarchy:
- Main Town
 - Small Towns and Larger Villages
 - Medium Villages
 - Smaller Villages
 - Secondary Settlements
 - Unclassified Settlement
- 2.9 Ifield is a secondary settlement. Ifield itself is in Crawley and is separated from the boundary to Horsham District by Ifield Brook and open space. On the Horsham District Planning Framework Plan there are only green infrastructure policies, there is no centre or existing services and facilities of any note.

2.10 If Land West of Ifield was not subject to a strategic allocation, then the Spatial Strategy of the plan would not support development there. Consequently, Policy HA2 is at odds with the Spatial Strategy.

2.11 Crawley does not support the Land West of Ifield allocation which they objected to at Regulation 18 stage, which would essentially expand Ifield. Without the joint agreement with Crawley there is no common ground for ensuring that development in allocation HA2 is joined up. The only joint agreement seems to be about the provision of a new school to benefit Crawley, however as indicated in our review of the plan, there is no current need for a school in the West part of Crawley.

3 Spatial Objectives

3.1 There are 10 spatial objectives which are set out in bold below:

Ensure that future development in the District is based on sustainable development principles that strike the correct balance between environmental, social and economic priorities and deliver thriving communities with a strong sense of place.

3.2 The National Planning Policy Framework September 2023 (the Framework) sets out the three sustainability principles:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low

carbon economy.

3.3 To meet this objective the plan should allocate land for housing and employment in areas which are close to existing services and facilities, and which are well connected to existing transport infrastructure. In the case of allocation HA2 the economic objective of the Framework is not met, and the allocation will not improve biodiversity. The proposed housing in this allocation, if taken in isolation might appear to be a positive step as they can be built with modern materials and would achieve zero carbon, but when you take account of the need for transport infrastructure between the allocation and Crawley, take account of the impact the development will have on the traffic and air quality in Crawley, the Environmental objectives of the Framework are also unlikely to be achieved.

3.4 The Framework states that the three overarching objectives are interdependent and need to be pursued in mutually supportive ways to secure net gains across each objective. HA2 fails to achieve these objectives and does not represent sustainable development.

Ensure that new development minimises carbon emissions and contributes to local and national net zero targets of 2030 and 2050 respectively. There will be adaptation to the changes to the climate, and reductions in climate emissions including through measures such as renewable, low carbon and decentralised energy.

3.5 As already covered in chapter 1, the plan is not fully aligned with the Council's Climate Emergency status and unfortunately the CAS does not inform the development of this plan. By building housing in the wrong place this objective is not likely to be met.

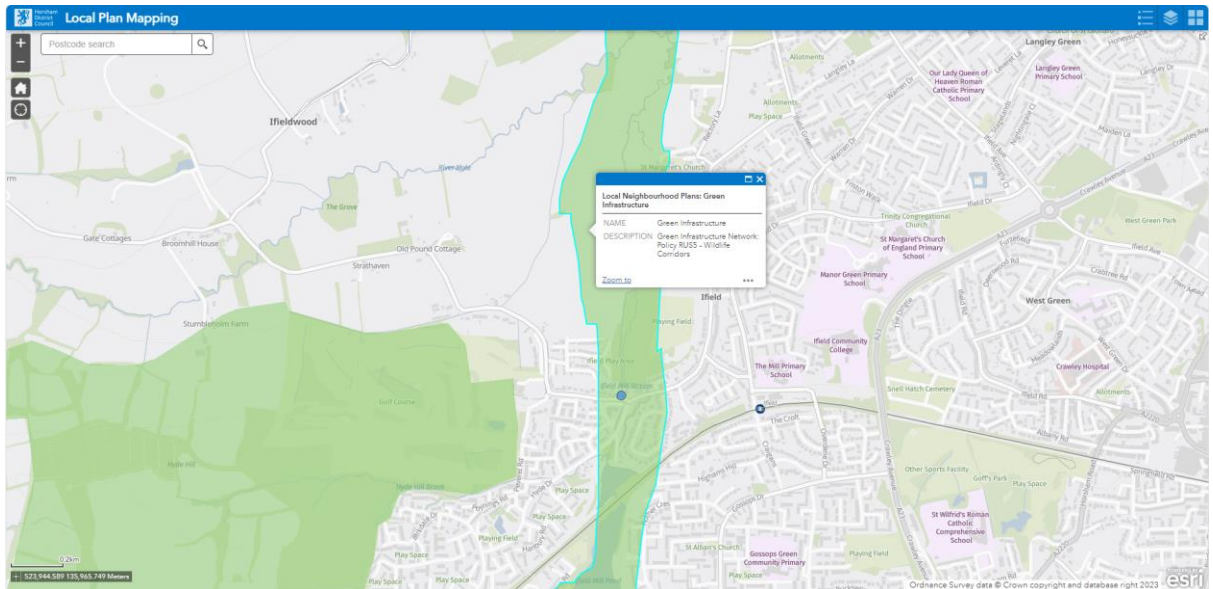
Identify and preserve the unique landscape character and the contribution that this makes to the setting of rural villages and towns in and adjoining the District whilst ensuring that new development minimises the impact on the countryside.

3.6 The plan has been developed without the benefit of a Landscape Visual Impact Assessment. Ruser Parish Council have commissioned an Independent Landscape Report which concluded that an “*appropriate and proportionate evidence on the landscape implications of the proposed development has not been provided; and given the strong likelihood that the proposed allocation would be the first step towards the development of circa 10,000 homes across a wider area that would adversely affect the High Weald National Landscape (AONB) and its setting*”.

3.7 In preparation of the plan, the Council failed to ensure that it identified the unique landscape character of land West of Ifield. Consequently, the allocation cannot preserve it. Furthermore, the location next to the urban area with several well used public footpaths will ensure that any visual landscape impact would be experienced by many members of the local community so would be significant.

To safeguard and enhance the environmental quality of the District, maintaining and enhancing ecosystem services, and delivering biodiversity net gain and building the nature recovery and green infrastructure networks. Development will minimise any impact on, and where appropriate, enhance environmental quality including air, soil, water quality and the risk of flooding.

3.8 The area in green below covers much of the HA2 allocation and is subject to policy RUS5 – Wildlife Corridors of the Ruser Neighbourhood Plan 2018 – 2031 made November 2020, and part of the designated green network:



- 3.9 The site is also identified as a Biodiversity Opportunity Area. Sussex Biodiversity Partnership describe it as follows *“Rusper Ridge has been recognised as a Biodiversity Opportunity Area (BOA) as it represents a priority area for the delivery of Biodiversity Action Plan (BAP) targets. It is one of 75 such areas across Sussex. The BOA covers approximately 1250 hectares.”*
- 3.10 The loss of a large part of Rusper Ridge will not safeguard the environmental quality of the district, maintain or enhance ecosystems or deliver biodiversity, furthermore it will likely result in poorer air, soil and water quality.

Brings forward well designed inclusive development that takes account of community feedback and is supported by the timely provision of necessary infrastructure (in advance of or concurrent with new development) that prioritises walking, cycling and public transport, provides accessible community services and open spaces that meet local and wider District requirements and contributes to healthy lifestyles.

-
- 3.11 Save West of Ifield (SWOI) were formed in summer 2021 and have since engaged with every step of the plan consultations, they have engaged with their MP's, Councillor's, have publicised their concerns in local papers and on the radio. The regulation 19 version of the allocation does not take account of the feedback they have previously provided.
- 3.12 The Spatial Strategy recognises in paragraph 3.4 that there is an existing transport infrastructure deficit, and that wider infrastructure investment is required to reduce unresolved and ongoing congestions issues. It states that *"60% of the residents of Horsham District live and work within the District"* and that there is a strategic road, the A264 and a railway which links Crawley to Horsham. This is a key link between Crawley and Horsham which bypasses Land West of Ifield which is located further North. The spatial strategy recognises some key constraints which is at odds with the allocation policy HA2.
- 3.13 The proposed transport infrastructure is limited to take place within the allocation, yet the evidence already suggests that measures are required outside of the allocation provide necessary capacity between this area and Crawley now, which are currently not sufficient to support the development proposed in the HA2 allocation.
- 3.14 The comprehensive transport strategy is a requirement of policy HA2 to be submitted as part of the masterplan. However, this delivers no new infrastructure outside of the allocation which is necessary to mitigate the impact of a significant release of housing, retail and employment. There are no agreements or funding in place between other Authorities to ensure that the allocation can be delivered with the remaining infrastructure and so will not make a positive contribution to wider district requirements.

To safeguard and enhance the character and built heritage of the settlements in and adjoining the District and ensure that the distinct characters of these settlements are retained and enhanced, and amenity is protected.

3.15 The land allocated in HA2 provides a transition from the urban area to an open countryside character, existing leisure uses which have little built form would be lost and as already highlighted the existing landscape visual amenity will not be protected.

3.16 With regard to built heritage a *Cultural Heritage Desk Based Assessment – Sites Identified for Potential Allocation for Housing Development* is part of the supporting evidence for the Reg19 plan and makes the following recommendations “as a minimum the following issues should be considered as part of any detailed site assessment to mitigate any harm to the significance of the identified assets;

- *The quantum of development particularly around Pound Cottage, and towards to the edges of the site.*
- *Height of development and site lines/views.*
- *Consideration of the rural character of the area, which also forms a part of the significance of the setting of the listed buildings.*
- *Interaction between the existing settlement and the proposed development including walking routes including the possible inclusion of twittens.*
- *Creation of a sense of place using traditional materials and reflecting the scale of traditional dwellings.*
- *Consideration would need to be given to the cumulative impact of development on the overall landscape and historic character of the locality.”*

3.17 With respect to heritage policy HA2 only refers to the pattern of development, stating it should enhance heritage features. Section 3c) states that particular attention is given to *“Preserving and enhancing all designated and non-designated heritage assets and their settings, including the Ifield Conservation Area (which includes the Grade I Listed St Margaret’s Church), and Ifield Court (Scheduled Ancient Monument) and as far as possible historic field patterns.”*

3.18 The requirements of HA2 fall very short of the minimum required by the Heritage Assessment and will not safeguard or enhance existing built heritage features. The minimum requirements are also likely to have an impact on delivery and there is a risk that predicted housing numbers cannot be fully realised.

To meet employment needs and create opportunities to foster economic growth and regeneration, including a low carbon economy. Employment growth will provide high-quality local jobs that maintain high employment levels in the District, help reduce commuting distances and facilitate and promote innovation in business with support for technological upgrades and change, including full-fibre broadband.

3.19 The justification for Policy HA2 states that Crawley *“plays a key economic role within Northern West Sussex and is at the centre of the Gatwick Diamond”* and goes on to state *“It will link to and support the economic hubs of Crawley and Horsham, located at the epicentre of the Gatwick Diamond, and significantly boost employment opportunities, skills and prosperity in the area, whilst addressing local housing needs”*. The Economic Growth Assessment¹ states *“it would be important for HDC to work closely with other local planning*

¹ Northern West Sussex, Economic Growth Assessment, Focused Update for Horsham, Horsham District Council, November 2020

authorities in the wider housing market area to ensure appropriate provision of any associated employment land, and to avoid 'double counting' of supply".

- 3.20 In the most recent Economic Growth Assessment² for Crawley in its conclusions finds that *"the Council should seek to accommodate the requirements related to labour demand (scenario 1) of 113,390 sq.m (26.2ha)"* This indicates that existing labour supply is driving employment need, there is no indication that there is a shortage of labour which housing on land West of Ifield would address. It goes on to conclude that Scenario 4 would generate *"a higher scale of requirements for all employment land uses, reflecting the relatively significant scale of housing delivery planned to take close to the Borough's boundary (i.e. at the West of Crawley allocation) which if delivered in full, could support a greater uplift in local labour supply, economic activity and associated employment land requirements over and above the 26.2 – 32.0 ha identified by the first two scenarios which provides measures of economic demand and market need."*
- 3.21 The 2021 version of Crawley's Reg19 Local Plan reported an employment need of 38.7ha as a minimum and makes provision in the plan for 17.6ha allocation of employment sites, reporting a shortfall of 24.1ha. This may now need to be amended in light of the findings of the recent Economic Growth Assessment for Crawley, but even this report suggests that in the event HA2 is fully realised Crawley's employment need will grow.
- 3.22 Strategic Policy 29: New Employment is proposing just 17ha of new Employment Land and only 2ha of it would be at HA2. The need for employment land is driven by housing supply, yet in relation to existing employment needs for Crawley, which directly relate to the HA2 allocation there is no evidence of any

² Northern West Sussex Economic Growth Assessment Supplementary Update for Crawley Final Report January 2023

current labour shortage, only an employment land shortage. Furthermore, the predicted employment need in the recent Crawley Economic Growth Assessment for Crawley, as a consequence of HA2, is likely to be much greater than the 2ha of employment land allocated in policy HA2.

- 3.23 For these reasons it cannot be concluded that the allocation HA2 will meet employment needs to foster economic growth and regeneration, only worsen an existing demand for employment land in the area. Consequently, with a potential imbalance of housing in the area, new households may need to travel further to work which would increase commuting distances.

To recognise and promote the role of Horsham Town as the primary focus for the community and business whilst preserving the unique ambience that contributes to the District's attractiveness. The smaller market towns will be recognised as secondary hubs and encouraged to meet local needs and act as a focus for a range of activities, including employment, retail, leisure and recreation.

- 3.24 The key allocations for strategic scale growth are Land West of Ifield (Crawley), Land North West of Southwater, and Land East of Billingshurst. None are in the urban area of Horsham Town itself and whilst it is understood that other uses are important for the Town Centre it should also be recognised that a higher level of housing can help to increase footfall, vibrancy and increase levels of expenditure to the benefit of other Town Centre uses.

- 3.25 In respect of Town Centres, paragraph 92 of the Framework, states that planning policies “*should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation*” and “*define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to*

grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing)”

Provide a range of housing developments across the District that: deliver the target number of new homes; respect the scale of existing places; and deliver a range of housing sizes and types to meet the needs of young people, families and older people and provide of a range of affordable housing.

- 3.26 A key issue with the allocation HA2 is with delivery. The allocation is not proved to be deliverable, at present not all of the land is in the ownership of the land promoter and the viability study did not take account of the provision of an additional Primary School, the provision of healthcare facilities or the mitigation requirements for the loss of Ifield Golf facilities. There is no evidence or information to provide assurance that the upfront requirements of the Crawley West Multi-modal Corridor can be delivered, which in any case may not mitigate for the increase in traffic.
- 3.27 The evidence suggests that HA2 cannot be delivered during the plan period and the plan will be unable to deliver the target number of new homes.
- 3.28 In paragraph 4.15 of the Reg19 plan it states that *“The level of growth that is required to help meet housing needs within the District requires the strategic scale expansion of existing settlements”* The strategic site HA2 expands Ifield in Crawley and does not necessarily meet the need of those within the district. The plan does not make clear whether HA2 is meeting Horsham or Crawley’s needs. *“The standard methodology calculation for Horsham District in 2023 is calculated as 911 dwellings per annum. This is equivalent to providing a minimum of 15,487 homes in the 17-year period between 2023 and 2040”*. The Council’s Strategic Policy 37: Housing Provision states *“The Council’s evidence base work has identified a total of 13,212 homes which are considered to be*

deliverable in the Plan period." 3000 of these homes are allocated at HA2 which may mean the Council target is a third below the housing needs of Horsham.

4. Sustainability Appraisal

- 4.1 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a plan must do so “*with the objective of contributing to the achievement of sustainable development*”.
- 4.2 The Submission Plan consultation also provides an opportunity to review and comment on the Sustainability Appraisal which underpins the Local Plan. The Sustainability Appraisal is an iterative process which must be carried out during the preparation of a Local Plan. Its purpose is to promote sustainable development by assessing the extent to which the emerging plan, when considered against alternatives, will help to achieve relevant environmental, economic and social objectives.
- 4.3 In accordance with Article 5(1) of the Strategic Environmental Assessment (SEA) A Directive and regulation 12(2) of the SEA Regulations, the environmental report must identify, describe and evaluate the likely significant effects of the reasonable alternatives to the plan taking into account the objectives and geographical scope of the plan.
- 4.4 'Suitable Alternatives' is the SEA/SA stage that has been most consistently challenged at examination/inquiry and in the courts. Three sets of information are needed for each set of alternatives:
- What reasonable alternatives have been identified and on what basis?
 - How they have been assessed and compared (including how sustainability issues have been considered)?

-
- What are the preferred alternatives and why they are they preferred over other alternatives?
- 4.5 National Planning Practice Guidance sets out that a Sustainability Appraisal is a systematic process that must be carried out during the preparation of a Local Plan. The appraisal must set out how sustainable development is achieved, in doing so assessing reasonable alternatives, achieving environment, economic and social objectives.
- 4.6 The Sustainability Appraisal offers an opportunity to ensure that proposals within the Local Plan are the most appropriate and suitable having assessed reasonable alternatives. The Sustainability Appraisal underpins the Local Plan and as such its lawfulness is a requirement in the plan making process. Importantly guidance sets out that Sustainability Appraisal should be an iterative process informing the Local Plan prior to the completion. Since the regulation 18 version of the plan the study has been updated to take account of the impacts of water neutrality. For example, there has been consideration of the impact of a policy setting a water efficiency standard which for this version of the plan is reduced to 85 litres per person per day, compared with the previous requirement of 110 litres per person per day.
- 4.7 The Sustainability Appraisal considered six spatial options for employment and housing development:
1. Existing settlement hierarchy strategy: Focus growth in and around the key settlement of Horsham and allow for growth in the rest of the District according to the size of the town or village.
 2. Proportionate growth strategy: Growth is apportioned to all towns and villages according to their current population.

3. New Garden Towns: 90% of growth at new garden towns, and 10% at small sites.

4. New Urban Extensions: Like Option 3, but with most of the growth at new urban extensions instead of at new garden towns.

5. Employment Strategy: Focus growth in the district where much employment growth is expected (some of this could be close to the District boundary to respond to the areas which are of economic importance outside of Horsham).

6. Sustainable transport strategy: Growth focused at towns and villages with existing rail links, high frequency bus services, and to a lesser extent good access to A roads.

4.8 Options 1 and 4 were considered to perform the best and the Council considered 10 large site options including Land West of Ifield. These 10 sites were appraised in more detail than smaller site options. There is little clear explanation of why this was decided as many of these sites might also fall within option 1. It is likely that smaller site options would have less need for infrastructure and have less effect on the environment so would have scored well in the Sustainability Assessment, this approach should be reconsidered.

4.9 One of the 10 sites through the SA has been dropped from consideration for allocation. This site is The Horsham Golf & Fitness Club Site (SA754) *"This site had been deemed in the Regulation 18 Site Assessment Report to be not suitable for development by the Council, the main reason being that it would have a very negative landscape impact partly as the site is predominantly rural in character, and development would lead to coalescence of Horsham and Southwater. As such it was recognised as having strategic implications."* Notwithstanding this exclusion, this site was appraised to the same level of detail as the other large site options because it was being promoted for a significant number of homes.

4.10 The following table illustrates the key for the colour coded charts which set out the positives and negatives for each site:

Table 3.4: Key to symbols and colour coding used in SA

++	Significant positive effect likely	--/+	Mixed significant negative and minor positive effects likely
++/-	Mixed significant positive and minor negative effects likely	--	Significant negative effect likely
+	Minor positive effect likely	0	Negligible effect likely
+/- or ++/--	Mixed minor or significant effects likely		Likely effect uncertain
-	Minor negative effect likely		

4.11 The following table is an extract from the SA which includes Land West of Ifield (SA101) alongside Horsham Golf and Fitness Club (SA754) which the Council has chosen to remove from the Regulation 19 version of the plan.

SA Objective	Urban extension or 'satellite settlement' sites	
	SA101: West of Ifield	SA754: Horsham Golf & Fitness Club
1: Housing	++	++
2: Access to services /	++?	+/-?
3: Inclusive	+?	0
4: Crime	0?	0
5: Health and	++/--?	--/+?
6: Biodiversity	--?	-?
7: Landscape	--?	--?
8: Historic	--?	--?
9: Soil quality	-	-
10: Mineral	--?	--?
11: Water	-?	0
12: Flooding	-?	-?
13: Transport	++/-?	++/-?
14: Air pollution	++/--?	++/-?
15: Climate	+/-	+/-?
16: Economic	++	+
17: Access to employment	++	+/-?

4.12 There are anomalies with the scoring which are apparent through a comparison between SA101 and SA754.

-
- 4.13 SA754 is located 1.46km from a train station and is adjacent the A24 a strategic Highway, it is also 2km from the centre of Horsham so it is difficult to understand how SA101 could be considered to perform better. The lack of existing suitable highway infrastructure and proposed need for phased highway improvements for SA101 means a conclusion that there would be significant positive effects cannot be reasoned, certainly it should not score the same as SA754. With regard to air pollution and climate change with respect to SA101, the significant building and infrastructure requirements, the need for the allocation to make provision for a school place deficit in the East of Crawley, the centre of which is designated as the Hazelwick Air Quality Management Area, must surely score negatively for both of these objectives on the sustainability appraisal.
- 4.14 The reappraisal of SA101 as considered above, also does not take account of the issues raised elsewhere in this report about unmet employment need which is a significant issue for Crawley and which affects SA101 more than SA754, and would surely justify a reduced score for both Economic and Access to Employment objectives for SA101. The evidence for this employment position post dates the evidence produced for the SA. The Council in considering these concerns should re-appraise SA101 and feed the information back into the next SA as part of the iterative process.
- 4.15 Once taking account of these necessary corrective measures the table should be amended as follows:

SA Objective	Urban extension or 'satellite settlement' sites	
	SA101: West of Ifield	SA754: Horsham Golf & Fitness Club
1: Housing	++	++
2: Access to services /	--?	+/-?
3: Inclusive	+?	0
4: Crime	0?	0
5: Health and	++/--?	--/+?
6: Biodiversity	--?	-?
7: Landscape	--?	--?
8: Historic	--?	--?
9: Soil quality	-	-
10: Mineral	--?	--?
11: Water	-?	0
12: Flooding	-?	-?
13: Transport	--/+?	++/-?
14: Air pollution	--?	++/-?
15: Climate	--?	+/-?
16: Economic	++	+
17: Access to employment	++	+/-?

4.16 SA101 should therefore should also have been removed from the Regulation 19 version of the plan. It performs poorly in the Sustainability Assessment which is only useful if the information it considers is accurate which in the case of SA101 this does not appear to be so.

-
- 4.17 The non-technical summary of the SA states that SA754 did not score favourably due to increased adverse impacts “on SA13 Transport, SA14 Air Quality and SA17: Access to Employment due to the proposed increased level of development not being located close to any significant community facilities, and therefore again potentially increasing reliance on private car use”. This is an allocation which would be walking distance to Oakhurst Business Park, the train station and the centre of Horsham and would be an allocation large enough to provide additional community facilities if the Council required.
- 4.18 Appendix 1: Summary of Sustainability Assessment changes for proposed strategic allocations provides further clarification for the removal of SA754 “the site is not of a scale or in a location where it would provide significant new community facilities to meet day to day needs (e.g. education / retail) rather than the proposed sporting facilities, this would increase the number of people travelling to other services and facilities – increasing adverse impacts against sustainability criterion SA13 Transport, SA14 Air Quality and SA17: Access to Employment”.
- 4.19 SA754 is 55 hectares and is large enough to provide a school and shops, it is already alongside a strategic highway and is sustainably located near to Horsham and Southwater.
- 4.20 Overall, the Sustainability Appraisal concluded that the Local Plan sets out a positive approach to achieving sustainable development which will contribute towards meeting the needs of the local community up to 2040 within the constraints of water neutrality. The Sustainability Appraisal identifies that many of the sites proposed for allocation are on greenfield sites which without mitigation has the potential to give rise to adverse environmental impacts. However, the policy safeguards that have been incorporated into the Local

Plan will mean that the potential adverse effects that would otherwise arise can be mitigated. Unfortunately, a review of the Sustainability Appraisal highlights that some of the information used is not accurate and consequently the outcomes do not reflect the aim and objectives of the plan.

5. Conclusion

- 5.1 The Spatial Strategy builds upon previous development hierarchies to ensure that future housing and employment is located in the most sustainable places.
- 5.2 The Spatial Strategy is at odds with the Strategic Allocation HA2 which would expand a secondary settlement which has little existing services or facilities.
- 5.3 A review of the Sustainability Appraisal has highlighted that the Council's original assessment of SA101 is missing key issues which would affect the score and does not consider the current position regarding employment research. The original conclusions have resulted in a more favourable SA score than SA101 should have attained. Consequently, this has resulted in a scenario where another site, SA754, which is in a more sustainable location, being near to services, facilities and employment, is well connected to transport infrastructure, has been rejected from allocation in the Regulation 19 version of the plan.
- 5.4 The conclusions of the Sustainability Appraisal cannot be relied upon and the retention of SA101 and exclusion of SA754 for the Regulation 19 version of the plan is not justified and is an example of how a Sustainability Appraisal is only as accurate as the information it considers.