

Rusper Parish Council

Response to DC/25/1312

Homes England West of Ifield Hybrid Planning Application

Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.

Land West of Ifield Charlwood Road Ifield West Sussex

Summary

Rusper Parish Council strongly opposes this application.

It fails to meet critical sustainability requirements of national and local planning policy, especially in relation to transport and landscape. It proposes a new stretch of dual carriageway to service the site, but this only connects to narrow country lanes at either end and does not join to any A or B roads as expected under national planning policy guidance.

This hybrid planning application clearly fails the Spatial policy of both the current Horsham District Planning Framework [HDPF] and the proposed Horsham Local Plan. It fails all considerations of the current and proposed Spatial policies. It is not attached to any existing settlement within the Horsham District and is clearly seen as an extension to Crawley, but forms no part of Crawley's Local Plan and has been rejected by Crawley Borough Council as failing to meet any of their requirements.

It is an entirely green field development that removes an important sporting and recreation area that is Ifield Golf Course in addition to arable farm land that acts as a flood plain as well as contributing to local food production.

It fails national and local biodiversity requirements. The area proposed for development provides one of the most diverse range of wildlife habitats to be found anywhere in the country. Individual studies fail to recognise the diversity of habitats all interconnected by ancient hedgerows and water courses.

It is being put forward with no understanding of the consequences to local services. The current Thames Water waste water management for the area is at capacity with no plan for how it will be expanded to cope with this extra burden. The Southern Water water supply is also over capacity with critical environmental impact on the Arun Valley.

There has been no long term planning for what the impact of this development will be or how it will fit with other now agreed developments such as Gatwick expansion. There is no clear plan as to what form or route the proposed Crawley Western Relief Road will take or how or where it will join the existing major road network.

All in all this is a proposal just targeted at meeting a housing requirement imposed by central government and encouraged by Homes England to see a maximum return on land they own. It is not plan led as this site has been repeatedly rejected by local planners, until Homes England presented them with an easy option. The final selection process to include this site in the draft local plan was spurious. More suitable proposals are available elsewhere that do not face the same water supply and waste water issues, that connect directly to the major road network and that do not over intensify strategic development in one area of the district.

We wish all of our previous submissions in relation to the inclusion of this site into the currently suspended Horsham Local Plan to be taken into consideration. These are included as Appendices to this submission. Note that specific details of policies and key evidence documents are referenced in the detail below. This is Rusper Parish Council's [RPC] initial response, given the scale of documents presented and the inability to access the documents due to failings of Horsham District Council's [HDC] planning portal, other submissions are likely to be required.

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Planning Policy

Fails the National Planning Policy Framework [NPPF] :

- NPPF (para 175-177) states that, in relation to flood risk, if there are reasonably available alternative sites the development should not be permitted. Clearly, from HDC's own assessments, there are a number of alternative sites that do not incur this limitation.
- The absence of any connection to an A or B road fails the transport sustainability aspects of the NPPF (para 109 and 117).
- As a large scale development this should either have been planned as a new settlement, or a significant extension to an existing settlement (NPPF para 77). This proposal is neither, it isn't supported by Crawley as an extension to that settlement, nor does it incorporate all of the design features of a new settlement.
- Without mitigation, not currently included, the proposals fail NPPF (paras 208, 212, 213, 215 and 219) in relation to conserving and enhancing the historic environment.
- It is clear that adequate mitigation and compensation have not been provided for the severe loss of biodiversity that would occur should this development be permitted, contrary to the NPPF (para 193). It is clear that alternative sites with much lower environmental impacts exist within the sites put forward for the Horsham Local Plan.
- It fails NPPF, para 187 and 198 which deal with conserving and enhancing the natural local environment. It is clear from evidence below that the important natural environment will be lost along with its amenity value and key recreational facilities.

Fails Planning Policy Guidance

With regard to water neutrality, the West of Ifield proposal falls a long way short of good practice. The Planning Practice Guidance states that 'an appropriate assessment must contain complete, precise and definitive findings and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed plan or project' (PPG para 003).

Fails the The Water Environment Regulations

There has been no proper evaluation of the impacts of ground water extraction, or alterations to existing water courses as required by Part 5 of The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017¹.

Fails the Horsham District Planning Framework [HDPF]:

This application fails to meet key policies within the Horsham District Planning Framework [HDPF] (and the defunct Horsham Local Plan):

- Critically, the Spatial Policy – it is not part of, or attached to any existing development and has been rejected by CBC as an extension of Crawley. HDC seem to be treating this as a stand alone development, but this is not supported by their own spatial policies. The Planning Inspector raised this key point at the start of his examination of the proposed Horsham Local Plan.
- Traffic modelling indicates that the surrounding road network is already at or near capacity, and the development would be contrary to national planning guidance and local policies

¹See Water Environment Regulations.

(HDPF Policies 2, 39 and 40).

- It fails Policy 2 “To maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services and local employment.”
- It fails Policy 25 “The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development.”
- It fails Policy 26 “Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development.”
- It fails Policy 31 on supporting Green Infrastructure and Biodiversity.

Fails the Rusper Neighbourhood Plan [RNP]:

Rusper Neighbourhood Plan is a 'made' plan having been adopted by HDC on 23 June 2021, however there has been little or no engagement with RPC by either Homes England or HDC in relation to policies and important supporting documents within the RNP. There has been no discussion with the RPC of mitigation in relation to the many negative aspects of the proposal.

- This site was assessed as part of the RNP² and failed on a range of criteria.
- The landscape assessments³ established the value of this area for flood protection, farmland, natural habitats and recreational use. Development in this area would lead to the coalescence of Ifield West with Lambs Green and Rusper. This is an especially important consideration given the recent developments along the A264 at Kilnwood Vale.

Failure to provide adequate documentation:

A general point on the application documents, particularly the Environmental Statement.

It is proving impossible to navigate the documents due to:

- The sheer volume;
- The total lack of correspondence between the filenames on the HDC portal and the Appendices they contain. For example for chapter 8 there are files for Parts 1 – 12, with no indication of what each contains. For example, the document ENVIRONMENTAL STATEMENT CHAPTER 8 APPENDICES PART 12 has file name WOI-HPA-DOC-ESV1-01, REV 1, with no mapping or list provided to help the reader locate a particular Appendix when it’s referenced in the main Chapter 8 report; and
- Once in the Part 1 – 12 files, many do not even contain reference to which Appendices the material relates. So again, it is impossible to follow the references in the Chapter 8 report through to the actual Appendix to which it refers.

This renders the consultation process unfit for purpose as the timescale and volume of documents alongside the inability to identify the relevant files makes timely and informed response impossible.

Alongside this, there are a number of misleading statements, factual and quantitative errors that serve to undermine the integrity of the proposal. For example, the claimed Natural England endorsement and in the executive summary there is double counting of water savings from allotments and podiums.

²See RNP Evidence base, Site Assessments.

³See RNP Appendix H.

Key Impacts on Rusper Parish

Transport

This proposal, for what is a small town, lacks any connection to either an A or B road. All of the exists feed into narrow country lanes that are already stressed by rat running traffic.

Critically, the Charlwood Road / Ifield Avenue junction will become a major bottleneck. The other exit onto Rusper Road will channel traffic into the rural road network, creating significant highway safety and capacity issues for Rusper, Lambs Green, Faygate and Newdigate. This fragmented strategy fails to provide a coherent, resilient access solution for a development of strategic scale.

The Rusper Road exit will encourage back routes via Rusper and Faygate to the A264, or via Newdigate to the A24 at Beare Green. These patterns would spread significant levels of development traffic across small rural settlements and unsuitable roads, with cumulative impacts on highway safety, residential amenity and the character of the countryside. Development of the site would create unnecessary pressures on the highway network contrary to paragraphs 109 and 117 of the NPPF.

This development is effectively a new neighbourhood for Crawley. As such it will be the only neighbourhood that does not have a direct exit onto an A road. All of the proposed exits from this development will be onto narrow country lanes and necessitate driving out onto the country lanes, or through existing neighbourhoods to reach any main road. The key impacts of this will be: increased congestion and pollution; poorer road safety, especially along Rusper Road between Hyde Drive & Tangmere Road; and increased rat running through the narrow country lanes.

The Stantec model, used for the Horsham Transport Study, Local Plan 2039 Transport Assessment⁴ submitted as evidence for the proposed new Horsham Local Plan, concluded that a number of mitigations were required, but this report is fundamentally flawed. It assumed that the growth in housing numbers around the area during the plan period would be only 6,489 dwellings and even over the extended period taking into account all allocations this figure is only 8,249 and for West of Ifield this figure is only 2,500 at most. However, the Local Plan itself assumed 777 homes per year or 13,212 total and the governments standard method housing need for Horsham is 917 homes per year, totalling 15,487. This suggests that the increased impact is almost double that assumed in the transport study.

The same Stantec model was used by Homes England to undertake its modelling of the area in their Steer report and therefore suffers the same fundamental flaws.

HDC has failed in its duty to assess the cumulative impact on the road network of all of the proposed developments in the vicinity. Each proposal has been considered in isolation and modelled accordingly, with no understanding of what the true impact of each will be. The absence of any data for the impact of other major developments, all focused around Rusper, mean that any modelling is speculative at best. Without substantial upgrades to the road network and a more comprehensive transport strategy, the development risks undermining both local mobility and environmental quality.

The Transport Policy Statement (Point 2.35), has an aspiration for 50% of all journeys to be walked or cycled. This is highly questionable. How realistic is this goal, especially during winter months or for families with children? Government guidance states “*A proportionate Monitoring & Evaluation plan should be developed for all active travel interventions*”⁵, but there is no indication that this will happen.

⁴Horsham Transport Study

⁵Active Travel Fund monitoring and evaluation

All of the active travel references in the application treat the proposal as an extension of Crawley, but the entire development has very poor connections to Crawley and is entirely within the countryside of the low weald, with its winding roads and small villages such as Rusper. A development of this size therefore has implications for two very different environments. Given that the only access to the development is via C roads, that is residential roads or country lanes, the proposals case that all of these issues can be mitigated by the new residents walking, cycling, and using buses, rather than using cars (a modal shift) is misjudged. The assumption of a high take-up rate of active travel is key to the viability of the application and much of how this will be facilitated on site is called into question. Even if active travel were achieved within the site, its continuation beyond the site is much more difficult and unlikely.

In relation to the evidence for a modal shift and its impact on active travel and the overarching traffic modelling, the Highways Agency's response to the application states that "It is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability, and operational efficiency of the SRN" due to insufficient evidence for the assumptions underlying the traffic modelling. The Highways Agency demands justification/evidence for the "very ambitious modal split 'vision'" (active travel), and bus usage assumptions. More information is also demanded on trip generation and distribution, how information from GAL has been incorporated, explanation of how the legacy and interim parking ratios have influenced the modal split assumptions later used in the trip generation and highway modelling, and explanation of how assessment affected if other sections of CWMMC are not delivered as modelled.

HDC's own Sustainability Appraisal for the draft Local Plan stated for WOI that:

"Commuting patterns for the area based on 2011 census data indicate that, despite the railway station, few people commute to work using the train. The majority of people in the area commute via private car and new development at this location has the potential to result in new residents adopting similar travel habits." [At Reg 18 and 19 2021 App D]

And "Furthermore, the delivery of the middle section of a new relief road will not address existing private vehicle congestion, and is proposed to be used for public transport access. Possible eventual delivery of the Crawley Western Relief Road may help to alleviate congestion in the area but is likely to reduce the potential for the achievement of modal shift."

It is clear that for a significant modal shift to match the assumptions several factors would need to be in place:

1. Cycle routes which are safe and lead to popular destinations outside the site. Whereas in reality the on-site planned cycle routes will join busy narrow roads with limited or no pavements and without their own safe cycle lanes. Additionally, the increase in traffic encouraging rat-running through neighbourhoods and surrounding areas, would discourage walking and cycling for safety reasons.
2. Safe pedestrian routes. In reality, counterflows of pedestrian traffic on narrow pavements, especially at school start and end times, when parents with young children and pushchairs will be vying for space with older students and the general public.
3. The availability of good rail and bus connections which can be accessed within a reasonable walking distance. In reality, any additional bus routes will use roads which are too narrow and where there is limited space for improvement. Ifield station has a short platform with limited space for improvement, zero parking and low performance related to cancellations, (actually the lowest in the country⁶).

⁶Ifield railway station in Crawley has the highest percentage of cancellations in the country, according to new figures seen by the BBC - Sept. 2025.

“Delivering a mixed-use development so that people can go about their day to day routines, without having to leave the site” would obviously reduce car journeys. If all of this infrastructure is not available from the initial build, it is not an effective solution. Even with all of this we must still expect an extra 3,600 cars exiting this site onto country lanes at Rusper Road and Charlwood Road.

Including “a multi modal corridor with high quality bus infrastructure, including bus lanes, and well designed, segregated pedestrian and cycle facilities between local centres to allow people to move safely and conveniently around the development, without having to use a car”, is a laudable aspiration. However, the multi model corridor exits onto rural roads, not A or B roads, with no pavements or cycle ways meaning that the design is fatally flawed. Moving around the development without a car is not guaranteed and discriminates against the elderly and disabled.

Future proposals to connect this multi modal corridor to the major road network to create a full western relief road for Crawley remain an aspirational target with no clear plan or any safeguarding for a proposed route for this to occur.

Given the high cost of use and absence of proposed bus routes, and the lack of any funding model for the bus services this proposal carries no weight.

The proposals state: “A car parking strategy which acknowledges current and future demand, which is expected to decline, given peoples attitude to travel, especially within the younger age groups”. No data is provided to support this statement. In fact the governments latest study for the Department of Transport, the “Car Ownership: Evidence Review”⁷, predicts the opposite. This study found a 50% increase in cars per household over the previous 50 years and despite a small decrease in 2021 and 2022, attributed to Covid, the upward trend now continues. Notably, according to the report, “in 2023 car sales appear to be on the rise again, with evidence showing that new car registrations in the UK increased by 17.9% in 2023 compared to 2022 and the used car market grew by 5.1% over this period”.

In addition to all of the transport issues above, the development lacks any thought to horse riders or carriage drivers.

In a recent survey over 30 equestrians reported having near misses with cars or vans and a couple of horses have been injured. One rider reported that she had an incident with a car almost every time she goes out for a ride. As highlighted, the existing roads are very dangerous for horse riders, even before this development adds to the problem.

There are over 350 horses in the area some of these are at livery yards whose businesses will be adversely affected by this development.

Should this development go ahead we would strongly ask that equestrians be given proper consideration. This should at least include footpath upgrades to FP150 and 1517 and within the development, the cycle routes that are proposed should be upgraded for equestrians use.

Landscape

From the emerging HDC local plan, strategic policy HA2 states that any development in this location must respect the rural and natural environment and local heritage and be brought forward in a sensitive way which generates net biodiversity gain, effectively mitigates any adverse impacts on protected species (such as bats) and delivers green infrastructure that is functionally linked to the surrounding environment. Development will also need to ensure access to the wider countryside for existing residents of Crawley is retained. This is reinforced by the revised NPPF, para 187 and 198

⁷Car Ownership: Evidence Review

which deal with conserving and enhancing the natural local environment.

Construction of the Proposed Development would change the existing landscape baseline by replacing rural farmland and a golf course with new built infrastructure comprising residential, commercial, retail, education and community use, as well as new road infrastructure.

The HE Main Environmental Statement states that over time, and with the maturing of the landscape proposals, the level of adverse effect would reduce slightly. The landscape along the River Mole would benefit from the maturing of the new green infrastructure associated with the Proposed Development for Phase 1 also that the wider character area beyond the Site would not experience significant effects due to the high level of visual containment of the Site from existing boundary trees and hedgerows. How can this be true?

There is insufficient evidence to show that the aspirations of a “garden town” and “landscape led” can be met. The vision is to create a series of landscape character areas based on the unique characteristics of each part of the site; open space within the development is categorised into a series of landscape typologies.

Many of the assessments detailed in the Landscape and Visual Impact report show “adverse effects” from construction to completion no additional mitigation required.

A number of key features of the area have been ignored, or dismissed, notably:

- This area's value isn't just buildings; it's the rural setting and approaches to Ifield village and church. Buffers and thin landscaping strips are not enough. The proposal urbanises this rural setting.
- Landscape and Visual Impact assessment has not addressed the ecological significance of the site in any meaningful way.
- Natural England suggest that the development may impact on the High Weald Area of Outstanding Natural Beauty but the Environmental Statement dismissed this statement by adding that “due to the intervening suburbs of Crawley there would be no intervisibility with the site”
- Environmental Statement and Design Code documentation admit that there will be significant adverse visual impacts for residents.
- Urbanising elements such as marker buildings, engineered SuDS basins, and hard urban edges are wholly at odds with the rural character of site.
- Public rights of way and views across Ifield Brook Meadows will be irreversibly changed.
- There will be loss and degradation of valued open spaces, including the role currently played by Ifield Golf

The HDPF provides key policies for protecting and enhancing the natural environment, which have not been properly addressed:

- Policy 2 “To maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services and local employment.”
- Policy 25 “The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development.”
- Policy 26 “Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development.”
- Policy 31 supporting Green Infrastructure and Biodiversity

The Landscape and Visual Impact report highlights many “adverse effects” of the development on the landscape.

Heritage

The medieval moated site at Ifield Court and the rural surroundings in which it would have been constructed and used will be seriously impacted by this development. Similarly, the Parish Church of St. Margaret which is a very fine example of a medieval parish church with a prominent 15th century tower will lose its current, largely open, setting consists of meadows and countryside to the west, which contributes to its historic value⁸.

This site represents a fine example of ancient hedgerows and field structures that provide an opportunity to understand the rural connection with Ifield village as the rural edge of development in this area, with the church standing alone at its western edge.

Water Supply and Flood Risk

This site clearly fails all aspects of water supply, waste water management and flood risk. Whilst water supply is from the Arun Valley and will seriously impact the RAMSAR, all waste water will flow out into the Mole which already suffers significant flooding.

Water supply

It must be emphasised that this development will receive water via the Southern Water network that relies on extracting water from the Arun Valley which is contributing to the declared Environmental Emergency for that region.

The Water Neutrality Statement (WOI-HPA-DOC-WNS-01 July 25) provided by Homes England is deeply flawed.

Its target of 85 litres per head of water usage is significantly below the governments predicted target of 110 litres per head of the population by 2050⁹. There is no justification given for this significantly reduced figure.

Similarly for commercial water usage, the assumption of 3 BREEAM credits would give a 40% reduction on the baseline figures, but again the governments predicted targets in the latest Environmental Improvement Plan [EIP] would only assume a calculation based on 15%. No evidence is provided for the assumed baseline figures or on who will be responsible for monitoring the outcomes. Obviously, this will be dependent on the type of commercial use that eventually takes occupation, but no consideration is given to that, so assuming better than the governments targets is not substantiated.

The assessment of bore hole provision is woefully lacking. There are two key issues: firstly there has been no hydrogeological study of the impact of removing this underground water on the below ground ecosystem, or the potential effect on structural integrity for the land above; secondly, there has been no long term study of the refill rate, especially during the critical times of drought. Additionally, the figures for groundwater extraction and rain water harvesting [RWH] seem to be a combined total in the calculations with no detail of how much is provided by each.

Use of SNOWS offsetting to achieve over 300,000 litres per day seem premature, when there is no evidence that that volume will be achievable, especially after already stalled approved developments

⁸Historic England submission.

⁹Reference the UK Government EIP and recent press statement from secretary of state.

has been given their allocations to allow properly considered developments to progress.

Waste water

Waste water will be managed by Thames Water, who in their submission make it clear that there is not sufficient capacity to support this development. In the absence of any clear and agreed plans to resolve this situation the development should not be permitted.

Thames Water also point out that the existing sewers that run across the proposed development have not been taken into consideration.

We urge HDC to additionally consider:

- a) the technical advice documents¹⁰ about water cycle that were prepared for Crawley and Horsham jointly and which showed that Crawley and Horley sewage works are at capacity;
- b) the monitoring of the River Mole (the receiving river) by the Citizen Science Group (River Mole River Watch Group¹¹), which shows the current poor quality of much of the river, and
- c) information about the financial and infrastructure problems of Thames Water from the press and from parliamentary discussion.

In respect of sewage and wastewater disposal the application is almost entirely concerned with plans of existing utilities infrastructure (pipes) and changes needed to these. There is no mention however of the capacity constraints at Crawley or other WWTW. This failure to acknowledge a known and significant issue forms a strong basis for objection:

1. **Failure to address a known constraint in the Environmental Statement** - The omission of sewage treatment capacity is an issue, particularly given the long-standing concerns with Thames Water and the clear environmental risk. This could be a breach of the EIA Regulations.
2. **Failure to provide mitigation** - Where a significant risk is known, the ES and application should propose mitigation measures.
3. **Potential misrepresentation in the Environmental Statement (Chapter 14)** - If the ES claims that Thames Water confirmed capacity exists when, in fact, their position was only that capacity needs to be assessed, that does look misleading. It may also have legal implications if it is found that the applicant has materially misrepresented consultation responses.

In relation to point 3 above: In the ES Chapter 14 Table 14.1 it is stated that in the “HDC: Letter dated 15th July 2024 - HDC have relayed comments from Thames Water and Southern Water, summarised below: Thames Water: • **Foul water requirements both on and off-site can be met**, including treatment and network infrastructure.” **But this is untrue.** The comments that HDC actually relayed in their response to the 2024 EIA Scoping Request were: “Thames Water consider the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met”. Thames Water were asking that the EIA / ES considers whether the demand can be met. They were not stating that it can be met. This appears to be a misrepresentation of the facts in the ES material.

It seems clear from the application that the necessary discussions with Thames Water have NOT taken place. The Utility Strategy Report says (4): “Based on these demand estimates, further consultation

¹⁰https://crawley.gov.uk/sites/default/files/2021-01/Gatwick_sub_region_water_cycle_study_August_2020.pdf

¹¹<https://www.rivermoleriverwatch.org.uk/post/river-mole-september-water-quality-status-poor>

will need to be undertaken with the incumbent local providers to confirm phasing and capacity within their local networks to meet the increased demand. It is understood that the separate Utilities Statement being prepared by Ramboll may describe additional, more detailed consultations that they are believed to have undertaken with incumbent local providers, but to date we have seen very limited information regarding any such liaison.”

But the Ramboll Utilities Statement does not add anything (4.4): ”The proposed discharge rate will need to be agreed with Thames Water via a pre-development enquiry application. Initial discussions with Thames Water suggest that there would be no issues with the proposed rates and connections to their sewer. ... Further liaison with Thames Water is required to agree the final arrangement.” In fact this completely contradicts Thames Water's submission.

Flood Risk

This development is in a flood risk area and will impact on high risk areas along the river Mole. The NPPF (para 175-177) suggests that if there are reasonably available alternative sites the development should not be permitted. Clearly, from HDC's own assessments, there are a number of alternative sites that do not incur this limitation.

The Environment Agency response highlights a number of concerns in relation to surface water management.

The National Standards for SuDS were updated in July and are very likely to mean alterations to both the full and outline parts of the application. WSCC the Lead Local Flood Authority has objected and requires additional information regarding the Technical note to cover how each National SuDS Standard is met/will be met .

Environment

The purpose of the Environmental Statement: Non-Technical Summary is unclear [ENVIRONMENTAL STATEMENT NON-TECHNICAL SUMMARY: WOI-HPA-DOC-ESNTS-01, REV 1].

We are very concerned that it presents a narrative which is far from an accurate summary of the findings of the chapters of the Environmental Statement. It has a clear bias towards the positive and reads like a public relations pitch for the development, rather than a scientific analysis of its environmental impact.

Horsham Council officers and councillors would be advised to avoid reading it, and to concentrate instead on the Environmental Statement itself.

Examples of the bias and lack of accuracy in the Non-technical Summary include:

- Under Biodiversity
 - Under-playing of the biodiversity baseline, via no mention of the designated Local Wildlife Sites surrounding, and within 2km of, the development;
 - Plus no mention of the high numbers of important, notable and protected species recorded in the surveys or in the SxBRC, as listed under S41, UK Bap priority, Sussex Rare or WCA protected species
 - Under-playing of the effects of the development, in particular no mention of the effect on Ifield Brook Meadows; and
 - A narrative that the overall effect will be beneficial. All the mitigations will be effective, and enhanced habitats will outweigh the adverse effects on species populations.

Gatwick

Gatwick Airport predict that the new second runway could raise the airport's capacity from 281,000 flights in 2017–18 to 375,000–390,000 by 2032–33. The subsequent noise impact on houses within this development area would be a serious health risk that has not been properly assessed or mitigated.

Loss of farm land

The value of this land in terms of food production has been underestimated. It has been productive farmland for hundreds of years and supports a mixture of arable and livestock farming that provides a valuable local source of food. No thought or proposal is given for the mitigation of this loss.

Biodiversity

Ecological impacts:

The loss of biodiversity across this site will be immense. The site comprises what is probably the widest range of habitats across a single site, all connected by ancient hedgerows and water courses, anywhere in the UK.

The habitat and ecosystems varies from west to east to encompass: open parkland with new forest plantations at Ifield Golf Course, through arable farmland which has supported a wide range of crops over hundreds of years, to grazed pastures and on to marshy areas and ancient woodland at the eastern end of the site. All of this is interconnected via ancient hedgerows and water course. Those water courses further connect this rich and diverse habitat area to the wetland environment of Ifield Mill Pond and Bewbush Water Garden.

The national significance of this diverse range of habitats has been lost in the Environmental Statement, which fails to recognise that such a diversity is very rare.

This diverse and interconnected range of habitats supports a number of rare and endangered species, including: bechstein bats, longhorn beetles and crayfish, as well as a number of red listed birds.

Evaluation of the ecological impact on existing habitats, and the number of rare species has not been properly undertaken. There is no mention of rare species such as Wild service tree, Midland hawthorn and Violet helleborine. There has been no study of mosses, lichens and fungi across the site, or any proper evaluation of the environmental impact on waterways.

There needs to be an independent assessment of all of these key environmental impacts.

These findings are backed up by the Environment Agency response and the Sussex Wildlife Trusts objections. These responses confirm the RPC view that adequate mitigation and compensation have not been provided for the severe loss of biodiversity that would occur should this development be permitted.

Evidence in the emerging HDC Local Plan for this area (HA2) indicate that "Proposals must provide a comprehensive Ecology and Green Infrastructure Strategy, incorporating a Biodiversity Net Gain Plan, to demonstrate how a minimum 12% net biodiversity gain will be achieved on the site". It is clear from the submitted assessments that not even the government's minimum of 10% BNG can be achieved and the likely best scenario would be less than 8%, which fails to take into account the key features of the diverse habitats listed above that already exist and will be lost.

Infrastructure

There are major shortcomings in key infrastructure provision.

In terms of schools the proposals fail to meet the required number of Primary school places for the number of houses proposed.

There is an absence of information on how Primary medical care provision will be met. This is something that HDC has responsibility for and has failed to indicate how this would be met. The nearest Hospital, East Surrey at Redhill, is already under increasing pressure, much of which is exacerbated by already increasing patient numbers. The East Surrey Hospital has had its rating lowered from "outstanding" to "requires improvement" by the NHS watchdog after its latest inspection.¹²

We have been unable to assess this application in relation to other key infrastructure requirements such as power provision, fire safety and policing, because of the failure of the HDC planning portal to provide access to the material. This is also true for aspects such as employment provision and assessment of need.

Section 106 Contributions

As this application progresses and the need for funding for community facilities or local infrastructure improvements becomes clearer, RPC as the Parish Council that will be responsible for this, would expect to be involved in all negotiations.

This would be especially important in relation to the proposed River Valley Country Park and the sports and play areas and community centres.

It needs to be appreciated that under current political boundaries, this will mean a significant growth to the management responsibilities of Rusper Parish Council and as such will require significant work by the parish council to plan this properly.

¹²'Outstanding' hospital now 'requires improvement' – BBC Aug 2025

Appendix 1a to 1c

RPC response to latest HDC Local Plan.

Appendix 1a Initial RPC response in 2020

Appendix 1b RPC Reg 19 response 2023

Appendix 1c Biodiversity Myth

Appendix 2

HA2 Independent Landscape Report 2024-02-20 by Neil Williamson Associates for RPC

Appendix 3

RPC NP Appendix H_Landscape Character Assessment and Assessment Of Local Gaps In Plan Area.
Specifically reference Spatial Plan Area 2

Appendix 4

RPC NP Site Assessment

Appendix 5

Rusper Parish Council - Highways and Transport Technical Advice by Alan Bailes Consultancy for
RPC

Rusper Parish Council response to Horsham District Local Plan 2019-36 Public Consultation (Regulation 18)

28th March 2020

Overall Response

The words “growth” and “sustainable” are used throughout the document for all aspects of the plan including housing, employment, and biodiversity. Yet it still insists that environmental needs will be met and prioritised. It seems that there has been a failure to realise the real facts and use basic logic when creating this document. There is a finite amount of land in the district and all of these things cannot grow without consequential environmental impact.

Its fundamental objectives are unattainable in any real scenario and the plan fails to identify which aspects will be sacrificed when these real world constraints are applied.

We have some sympathy with Horsham District Council's position, as it is based on unachievable and conflicting government policies and a central government taking more control of local matters, especially housing numbers.

The document emphasises “growth” throughout, but this is obviously unattainable for all areas of the plan as the actual land area for the plan has actually been reduced by the establishment of the South Downs National Park, whose own plan now covers part of the area covered by earlier Horsham District plans.

All assertions for growth should be based on three main factors:

1. The ability of the environment to accommodate and support the growth
2. Likely predictions for investment and economic growth
3. Likely predictions for population growth

This plan fails on all three counts. Again we sympathise with Horsham District Council, as national government has failed to identify these factors and has imposed unachievable objectives on the planning authority.

However, that is no excuse to produce a plan that fails to clarify the consequences of government targets. Local communities need to be clear that the environment is being sacrificed to meet unrealistic government housing and economic growth figures. At least then they will know what they are actually voting for and not this veil of policies that suggest that everything is possible. It is dishonest to imply that the environment can be protected, let alone enhanced, in these circumstances.

Two primary factors have been neglected in this plan:

The first is the global environmental emergency, which the UK government formally recognised in May 2019. This should focus attention on protecting all green field land and ensuring it remains green for agricultural, forestry, recreation or the natural ecology. Any additional housing need must be met by brownfield development, or intensification of already allocated sites.

The second critical factor is one that could not have been predicted, at least not against any timescale, and this is the Coronavirus pandemic. This has led to a catastrophic economic collapse, greater than anything we have seen in a generation. It throws all previous economic growth

assumptions out of the window. Its impact on death rates is still to be seen, but a significant reduction in elderly population figures is highly likely.

Finally, as with previous plans, this is a development led document and not a plan led proposal. The plan should first identify how the overall infrastructure needs such as basic services, schools, hospitals, doctors surgeries, public transport etc will be met. Those should be scheduled and in place before development starts. The build it and they will come approach in this plan is wholly inadequate for what is supposed to be an advanced society.

Summary

In summary, the plan is flawed as it fails to clearly identify the inevitable environmental impact that the increased housing numbers across strategic green field sites will cause.

It fails to challenge conflicting government policies and identify the consequences of these to the local population in terms of their environment and health.

Responses for specific sections of the plan

Chapter 3: Spatial Vision and Objectives

The general principles are what we would support, except that the presumption of growth of land use for economic and housing doesn't match with the more important principles of environmental quality and climate change or those of preserving the natural environment and district character. We would suggest that the word growth is removed, especially as the actual land area for the plan is reduced with the creation of the South Downs National Park. A broader principle of intensified land use for economic and housing purposes would be supported.

We would also support HDC using this land for Council house building wherever possible.

Account for the recent Coronavirus pandemic also needs to be reflected in the Economy section as this has caused the greatest financial slump in living memory.

Chapter 4: Policies for Growth and Change

Again, the use of the word "Growth" is misleading as the available land has actually decreased and this needs to be addressed more specifically. The plan is completely flawed if it assumes that the environment can improve when more land is devoted to the very things that are causing environmental collapse.

The need for a step change in housing growth in the area is not substantiated. The last HDPF was based on a local housing need of around 350 houses per annum for the plan period and for the final plan this had been increased to 900 per annum! At the 900 level it was already unsustainable in the long term, without completely destroying the local environment. Those increases were to account for extra housing provision for Crawley, Brighton, London and other local areas that could not meet their housing need. It seems that those extra numbers are being added in again, without any justification.

The housing market in the Horsham district is already at capacity with the existing allocated sites and developers are struggling to sell the units they are already building. Any increase in the previous HDPF allocation of housing cannot be justified in economic or sustainability grounds and will be disastrous for the environment.

The concept of "Sustainable development" within the NPPF seems fundamentally flawed. At a time of climate emergency especially, any development that leads to a loss of green environment is clearly not sustainable. It will lead to increased pollution and CO2 emissions whilst removing the

green infrastructure that helps to deal with that. It is contrary to the policies set out in the government's climate emergency declaration of May 2019.

Chapter 5: Economic Development

In the light of the recent economic collapse, the emphasis needs to be on rebuilding and supporting the local economy, rather than that word "growth" again. The emphasis clearly needs to be on encouraging businesses that reflect future needs, rather than propping up and encouraging the type of business models that are creating more pollution and claiming more of our local environment for profit rather than local needs.

Extra focus on education and training is important, to ensure that we have the skills locally to meet the needs of the evolving workplace.

Specifically, the sites in Langhurstwood Road would be suitable for intensification of use, but any expansion of these sites would be bad for the environment as it would lead to a loss of green space and wildlife habitat and a spread of the pollution impacts.

Any new commercial units should be required to provide electric vehicle charging points for the expected number of car spaces for staff and clients.

Chapter 6: Housing

Housing assessment at time of original HDPF in 2015 was for 750 homes per annum, to meet the needs of Horsham Planning District, Gatwick Diamond/Northern West Sussex housing, plus an allowance for the Coastal housing market area deficit.

Why are we seeing a growth of at least 450 per annum (to 1200) or more than 60% over 5 years, when these figures were supposed to represent the need through to 2031 and population growth rates are falling in the UK?

The government needs to be challenged on its housing projections. There are a number of contradictions in the method they use and the broader government policies for environment and public health.

It is still not clear how a figure of over 1,000 homes per year for HDC has been reached.

The government says that the house figures pushed onto planning authorities is based on the Household projections for England from the Office for National Statistics. However, looking at their latest figures (see

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/2016basedhouseholdprojectionsinengland/2016based>) it is clear that the government expects a 23% increase in house numbers up to 2041. So for Horsham with around 59,000 homes currently this would mean an annual increase of 646 units, or less than the current HDPF is delivering. Even with the originally proposed 150 extra for Crawley and 100 for the London effects, this would still only be the 900 per annum that is already being delivered. So there seems to be no justification for any extra, unless someone is double counting numbers somewhere.

Thus Strategic Policy 14 needs to be changed, ideally to reflect the 646 units that the government statistics suggest, and certainly no more than the 900 of the current HDPF.

Even given this, the government documents go on to point out that:

"The number of households is projected to increase because of increases in older households without children"

"The number of households with dependent children is projected to remain broadly similar between 2016 and 2041, with around a quarter of households having dependent children by 2041."

"Almost all the projected increase in households by 2041 will be among one-person and multiple adult households without dependent children."

This suggests that there is no need for significant extra general housing stock, but more a need for

specific focus on single occupancy units like flats, which provide a much better housing concentration and that there is no need to increase the existing HDPF land space allocation for housing. More than that, the housing policy should specifically reflect the need for all developments to be predominantly low occupancy units.

Whilst we understand that allocating all of the current HDPF sites to this type of unit is not desirable in terms of housing distribution and community structure, it does suggest that these sites should still have a balance skewed to single occupancy units. Where other sites in lower density areas are redeveloped, they should be entirely units of this type.

Potential Housing Allocations

In terms of Potential Housing Allocations, given the information above from government figures and the government's declared global environmental emergency, which the UK government formally recognised in May 2019, we would suggest that no more sites should be allocated than those already recognised in the existing HDPF.

Any extra capacity in terms of housing units should be met by an increase in housing density with more smaller units being produced in line with the government's own conclusions.

In response to the specific proposed allocations within or around Rusper Parish, we would make the following comments:

Land West of Crawley, Rusper

Rusper Parish Council STRONGLY OBJECTS to this proposal.

The site description states that this is “adjacent to the busy road network”, but in fact this area is not connected to any A or B roads and any exits from this site would be onto unclassified neighbourhood roads in Crawley, or narrow country lanes in Rusper.

A more valid description of the proposed site would be:

This is an area of open countryside and farmland with ancient hedgerows and woods. A principle part of the site is an existing golf course, which provides recreation and exercise amenity to the local people. The rest of the site provides important flood protection for areas further downstream on the River Mole, in addition to the farming use for food production and green space to improve the quality of the environment.

The land shown in red on the plan is only a part of the overall proposal from Homes England, so this proposal is highly misleading. It has been suggested that the area shown would provide around 3,000 houses and that Homes England would only provide the infrastructure requirements to support the development if the larger area through to Faygate and Lambs Green was included and 10,000 houses built. This would be equivalent to destroying almost half of the countryside in Rusper Parish!

The area is shown as amber for biodiversity, but it is unclear how this can be anything but red. The current area along Ifield Brook and the golf course provides a rich wildlife habitat with much diversity. The farm land is not intensively managed, so the fields and hedgerows are also a rich wildlife habitat with as wide a range of flora and fauna that could be expected for this area. It is unclear how building 3,000 houses on the area shown on the plan could be anything short of an environmental disaster for this area and would significantly reduce biodiversity. The area also has many ancient hedgerows and ancient woodland and development on this scale will have a major impact on the wildlife that is dependent on these.

Ifield Golf Course would form the start of this development, with the consequential loss of an important local amenity. This area not only provides a space for people to exercise while playing golf, but also for local residents to walk and enjoy the rural setting. Add to that the value of this open and maintained environment for wildlife, and the overall impact for existing local

communities is significant.

The viability section states *“At this stage, it is considered that there is potential for the development on this site to be viable”*, but the latest HDC SHELAA 2018 Housing Report shows all evaluated sites in this area as *“Not Currently Developable”*. It is not clear how the conclusions of these detailed studies have changed. We would refer HDC to its own SHELAA reports where, when considering this proposal, it states *“There are a number of constraints which impact the suitability and achievability of development on this site. This includes impacts on flooding, and the setting of Ifield Conservation area. The northern part of the site is within the Gatwick Airport Safeguarding area and noise contours. There are also a number of infrastructure issues which would need to be addressed, including sewerage and impacts on the existing road infrastructure”* and it is contrary to policies 1, 4 and 26 of the HDPF.

The proposal states the the development quality provides *“A clear vision for the site has been identified, based on Garden Community Design Principles”*. However, this is completely untrue, as only a rough outline of the area, with no densities or facilities, has been provided. There is no clear indication of how traffic will be managed and the suggested relief road, is currently a road to nowhere with no identified exit point onto the wider major road network.

There is no justification for a development of this scale anywhere in the district and the government's own growth figures and housing requirements prove that this development should not be considered.

This proposed site would break every policy in the Rusper Neighbourhood Plan and render that plan useless and make a mockery of the Governments localism policies.

Land at Kingsfold, Warnham (North West Horsham)

Rusper Parish Council STRONGLY OBJECTS to this proposal.

Again the implication that this site is deliverable and viable are misleading. The improvements to the A24 indicated are only around Kingsfold and the issue of the rest of the A24 between Horsham and Capel being a single carriageway are not addressed. This would mean that traffic from this site would be adding to the already significant problems along this stretch of road.

The concept of developing to the east of the railway line is beyond comprehension on any planning grounds and to suggest this, without a major rail crossing, is against all planning policy. Traffic accessing this side of the site would be onto single track country lanes, which could not possibly support the traffic associated with this many houses. It is impossible to see how a development of this size would support the necessary road improvements needed for both the A24 and the country lanes on the Rusper side. Also, part of Friday Street is designated as a “Notable Road and Verge” so development of this road is even less viable.

There is no indication of how secondary education would be managed. Secondary school provision to the west of Horsham is already inadequate and the new school proposed in North Horsham will struggle to meet existing demand.

Given the nature of the infrastructure requirements, added to the problems and cost associated with building on this type of blue clay soil, it is unclear how development in this area could be financially viable, unless Horsham is again going to relinquish CIL requirements and force the infrastructure costs on the existing rate payers.

In addition, given Gatwick's insistence on its need to expand, the potential impact of additional air traffic on noise and air pollution in this area needs to be carefully considered. That, along with the approved incinerator plant right next to this site, means that in terms of air quality this site should not be permitted. This area also fall within SSSI Impact Risk Zone 29316 for infrastructure and air pollution concerns.

The environmental impact has not addressed, with much of this area having ancient hedgerows and an ancient woodland at Old Barn Gill.

All of the area to the east of the railway would fall into Rusper Parish and development in this part

of the parish would be contrary to the policies of the Rusper Neighbourhood Plan.

Land at Rookwood, Horsham

Rusper Parish Council STRONGLY OBJECTS to this proposal.

Although not within the Rusper Parish, any further development along this stretch of the A24/A24 will increase the road traffic in the area and the road network is not capable of supporting it. This would inevitably lead to increased rat running through the country lanes of Rusper parish which are not capable of safely handling any increase.

Also, the impact on the nature reserve next to this proposed site does not seem to have been given sufficient weight and thus the biodiversity rating of amber is questioned. The idea that developing a green field site and isolating an important nature reserve can provide a biodiversity net gain calls into question all biodiversity assessments and their scientific validity.

In addition, the fact that the Education rating is shown as green when there is no indication of any additional educational provision as part of this development needs review. This is especially true for the west of Horsham where Secondary Education provision is already inadequate.

Smaller Scale Development

In terms of smaller scale development proposals, Rusper Parish Council strongly feels that no new sites should be allocated that are not already identified with the existing HDPF or Neighbourhood Plans or it is on a brown field site.

Any further housing requirement should be met by increasing the density of proposed developments and any further green field development should be avoided at all costs. This would be in line with government policy on the type of housing required and to align with the objectives of the climate emergency declaration.

Strategic Policy 15

Point 1: This should include access to public transport as a requirement for any strategic site development.

Point 5: “*Deliver high-quality mixed-use communities that provide a range of housing types and tenures,*” should be “*Deliver high-quality mixed-use communities that provide a range of housing types and tenures, with an emphasis on high density single and low occupancy units*”

Point 6: This should include a requirement for all units to include solar energy capture specifically.

Chapter 7: Conserving and Enhancing the Natural Environmental

The policies here are generally accepted by Rusper Parish Council. However, much of the rest of the plan is in contradiction to these policies, so it seems that they are not being given the priority they warrant, especially given the government declared state of climate emergency.

Chapter 8: Development Quality, Design and Heritage

This is an area that could be much more aligned with the environmental aspirations of the plan.

It would be better to impose the highest standards of insulation and energy efficiency at the time of building houses, to align with the government's climate emergency proposals, than to try to retro-fit these later when we find that carbon levels are not being met.

Chapter 9: Climate Change and Flooding

This should be Chapter 3 of the plan to emphasise its importance and to set the reference point for

all other sections of the plan. If the government is to have any chance of achieving the ambition of becoming net carbon zero by 2050, then the policies here must form the basis of all other policies. If the effects of climate change are not to lead to an increase in the extreme weather conditions which we are starting to see as regular occurrences, and make a significant financial impact, then real action needs to start now.

We must impose the highest standards for insulation and energy efficiency on all new buildings.

We must stop all building on land used for food production or forestry.

We must provide the highest standards of infrastructure.

We must enforce solar energy capture for all new roof structures.

We must provide electric charging points at all new developments.

All of these are simple and obvious, but are not forming part of the policies in any enforceable way.

With regards to flooding, it needs to be accepted that any green field development increases the flood risk. This is two fold: firstly, by removing the green plants that absorb carbon dioxide and secondly, by covering land that would otherwise act as at least a temporary sponge during times of heavy rain. On site mitigation merely increases the risks further downstream in the water network.

Chapter 10: Infrastructure, Transport and Healthy Communities

It is unclear how any of the strategic sites within this plan could go ahead given the current infrastructure problems throughout the district. There is a shortage of Secondary Schools, Doctors, Hospitals, services such as sewage and water and the public transport system is highly inadequate. Despite this, there is no overall plan for how these problems will be resolved **BEFORE** any development starts. For any proper plan led development, all of these things should be in place before any housing or commercial development starts.

There is insufficient emphasis on public transport and how this can be achieved. It should be a requirement for any new development, that it will not be permitted unless a regular public transport system is within walking distance of all houses on the development. For any new development, this will require commitment from an accredited public transport provider that this will be the case.

Rusper Parish Council



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8th December 2023

Via email

All Horsham District Council Councillors
Horsham District Council
Parkside
Chart Way
RH12 1RL

Dear Councillor,

Rusper Parish Council is highly concerned at the draft Local Plan that is now being considered for adoption by Horsham District Council. Some of our concerns are specific to Rusper Parish, but most apply to policies affecting the whole District. The version of the Plan being voted on at the HDC Council meeting on 11th December seems to have completely ignored the made Rusper Neighbourhood Plan that was fully adopted by HDC only last year.

Most importantly, it is open to legal challenge in three key respects:

1. It breaches existing statutory regulation,
2. It fails to meet its own policy goals, and
3. It fails to acknowledge the risks to delivery and is often based on wrong assumptions.

The impact of concentrating the greatest level of development in the rural parish of Rusper makes little sense in general planning terms, especially in terms of the coalescence of Crawley and Horsham and the impact on infrastructure provision.

Below we list the key points of our concerns and objections that make the proposed plan unsound. Further on, we explain in more detail the reasons why these present a valid case, in planning terms, for rejecting what is currently on the table and instructing the officers to reconsider the plan in the light of these arguments.

Rusper Parish Council will be seeking legal advice on how best to challenge these proposals, should they go ahead, especially in relation to our current Rusper Neighbourhood Plan.

Key Points

1. Housing numbers

There are serious problems with

- a) The calculation of overall house-building numbers – the new target is only marginally lower than the HDPF target and is double what is genuinely needed, and
- b) The concentration of house-building in and around Rusper Parish, making the coalescence between Horsham and Crawley more likely, and bringing into question the Council's spatial strategy.

2. The type of housing

There is insufficient housing for social rent and for the elderly compared to the need.

3. Transport implications

- a) There is a lack of long term planning for the increased traffic from the strategic sites and how this will be managed at a local level and in relation to broader traffic movements around the district,

- b) There is no coherent strategy for improving buses, rail and active travel (walking and cycling) across the district and a lack of coordination of non-car transport, and
- c) The plan lacks an approach to improving safety for recreational road users such as horse riding and carriage driving, cycling and rambling.

4. Infrastructure provision

- a) The implications of water shortage across the south-east region as a whole and specifically for water taken from the Arun Valley have not been addressed fully in the proposals. Additionally, the probable impact of increased flooding along the River Mole have been ignored. There is also no long term strategy for waste water management and ensuring our waterways stay free from sewage and other waste run-off,
- b) The long term issues of electrical power production and distribution to support the massive increase in housing proposed in the plan have not been addressed, and
- c) The issue of health care, both in terms of a much needed new hospital and proper resourcing for local doctors surgeries, especially in new developments, have been ignored.

5. Water neutrality

The specific issues of water neutrality, now a legal requirement for all development in the area, have been ignored, or misinterpreted.

6. Disregard for made plans and planning assessments

The vision and policies within the adopted Rusper Neighbourhood Plan have been ignored, as have HDC's own assessments of key strategic sites as 'not developable'.

This disregard for planning policy, extends into a disregard for democracy with election manifesto commitments to protect our countryside and to put residents first (from all parties) being completely abandoned in this plan. The plan also lacks any broader cross-boundary considerations, especially in relation to the environmental risks highlighted elsewhere.

7. Biodiversity

The scale and variety of habitats across the proposed West of Ifield development have been downplayed, and its recognition as Biodiversity Opportunity Area is ignored. The area is written off as low biodiversity without any consideration of the range of protected species, not least the newly discovered network of Bechstein's bat colonies.

8. Farming and agriculture

The importance of food self-sufficiency, especially at a time of major global climate change, has no consideration in the plan. We need to be protecting our farmland for agricultural production and restricting housing developments to already developed areas.

9. Golf provision

The importance of the existing Ifield Golf Course in terms of golfing sport provision as well as the access to open space that this site provides has been underestimated. There is a thriving golf club that uses the facility and the plans make no provision for a replacement if this land is used for development, despite this being a requirement of the National Planning Policy Framework.

10. Environmental Health

The decision to locate a major strategic site so close to Gatwick Airport, will put all those that live there at risk of exposure to noise and other potential pollution risks. This will be an even greater issue if Gatwick's plans for expansion go ahead.

11. Deliverability and viability

Finally, given the economic climate and the concentration of strategic developments around Rusper, the delivery of the proposed housing targets is at risk, and the level of infrastructure and affordable housing required must pose a huge risk to the viability of the West of Ifield. In fact, there is significant uncertainty around several key aspects of the Local Plan overall – not least water supply and sewage treatment. The NPPF requires uncertainty to be acknowledged and addressed in the Plan, and contingencies proposed where necessary. It's not clear this has been done.

Planning Detail For Key Issues

General Points on Planning Process

Whilst the Parish Council welcomes many of the policies within the new Local Plan, it is clear that there have been a number of major failings in planning terms.

The overall plan has failed to identify the current land use within Horsham District and the importance of each type of use to the local communities. It seems that trying to formulate a clear plan for the future must be based on understanding what currently exists. The base of any new plan must have at least a basic understanding of current land use in rough percentage terms for each aspect of the plan. It must also understand how that use is currently distributed and the reliance of each community area on those functions. Without that initial understanding, allocating land use without understanding the impact on the use it is replacing will potentially have disastrous impacts.

Despite the wide range of policies, the major impact area of the plan is focused on housing delivery. Although, undoubtedly this is a critical aspect of any plan, it seems that for this plan all other facets of planning have been pushed back, or ignored, to ensure that some formulaic housing number can be met. The true impact on transport and road infrastructure alone from the strategic housing allocation sites has been mostly ignored. The principle strategic site, misleadingly called “West of Ifield” is a key example, where a major development is proposed with no direct road linkage to any major road, not even a B road! This site was also put forward as the start of a potential 10,000 home development that would include a “western relief road” for Crawley. Despite the now statutory requirement to consider the longer term impact of strategic developments, the issue of how 10,000 new houses would be managed, or what wider infrastructure requirements should be put in place now to support it, this new Local Plan fails to make any of these considerations¹.

Horsham District Council makes bold statements about protecting the environment and preventing climate change², but fails to recognise the impact of both of these when selecting its strategic sites for development. More significantly, it does not even consider strategic site enhancement that could be done to enhance these goals, but concentrates all the planning effort into housing allocation yet again.

1. Housing numbers

a) The calculation of overall numbers

The new Local Plan continues with a house-building target double what it should be, which will perpetuate population growth at double the national average. This is not acknowledged in the Vision.

Housebuilding in Horsham over the past 20 years has very little to do with local need, and is almost entirely satisfying the demand from investors and households moving into the area. The new Local Plan continues this ‘strategy’. The housebuilding ‘target’ in Horsham’s new Local Plan is 777 houses a year – marginally lower than the HDPF target of 800 which itself was double what it should have been. The target would be 911 without the water neutrality constraints, or even 1,200 a year if the Standard Method calculation was updated with 2021 population census data.

This rate of building is completely unrelated to local need, and means Horsham is growing unsustainably. Horsham’s population grew by 11.8% in the 10 years between the 2011 and 2021

¹Para 22 of the NPPF states: Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

²HDC Climate Emergency Declaration “This Council declares a Climate and Ecological Emergency, based on the International Panel on Climate Change’s AR6 Synthesis Report of March 2023 which states that humanity is in the midst of a crisis entirely of its own making. This crisis has already resulted in a global surface temperature rise of 1.1°C, affecting many weather and climate extremes in every region across the globe, leading to widespread adverse impacts and related losses, including damage to nature and people.

We welcome the recent statement on the climate emergency and biodiversity crisis from our new council leader that “taking real action to combat these will not only be an immediate priority but will also be an ever-present consideration in all that we do throughout this term and beyond”.

“In response to this rallying call, this Council accepts the inadequacy of the climate related motion it passed in June 2019 and, leading by example, will significantly increase the rate of carbon reduction associated with its own corporate plan to achieve carbon neutrality for its direct emissions by 2030 and indirect emissions by 2050.”

ONS censuses, the highest of any local authority (LA) in Sussex or Surrey, and almost double the rate for England and Wales overall of 6.3%.

And this rate of growth is set to continue. Horsham Council may be relieved with a target of 777 but this is the same as the HDPF target, and will perpetuate growth of around 12% over the next 10 years. Targets of 911 or 1,200 will give us 14% or 19% growth over 10 years respectively.

How can this rate of growth be sustainable given the shortage of water in the south-east region, the inability of water companies to treat sewage safely, and the failure of developers and LAs to deliver the necessary infrastructure? None of this is acknowledged in Chapter 3 – Spatial Vision.

The shocking thing is that this growth is the result of excessive housebuilding. This is nothing to do with building to satisfy local need but is deliberate over-supply, with marketing to create demand from people outside the area. As a result, over 80% of the population growth is due to people moving into Horsham from Crawley (25% of the net inward migration in 2019), south London, Surrey, and other parts of the south-east.

b) The emphasis on Rusper area for allocation

Rusper is one of the most rural parishes in the District, comprising approximately 1,000 houses, mostly around the village and scattered hamlets. Rusper's made Neighbourhood Plan makes clear that any significant allocation of sites for housing will have an overwhelming impact on the Parish's character and way of life.

The Local Plan sets out proposals for strategic sites in Rusper Parish and its immediate vicinity which total 7,000 houses (North Horsham with intensification, Kilnwood Vale, West of Ifield). This is 66% of the Plan's proposals for strategic sites. But nowhere in the Plan or its evidence base is this concentration of house-building in and around a single parish acknowledged, explained or mitigation of its impacts discussed. This should at least be discussed in the Plan's Spatial Vision and discussed in Policy HA15 – Rusper. Plus we note that the relevant document is not yet available in the Evidence Base, ie the Horsham Housing Delivery Study Update

We also note that although the Strategic site assessments mention the benefits of urban extension, it doesn't appear that 'urban extension' is a stated Strategic Policy in the Plan.

2. The type of housing

The most pressing need is for social housing in both Horsham and Crawley, where 'social' is defined as 60% of market rents; in addition there is an increasing requirement for housing for the elderly. But developers of strategic sites don't deliver social housing, or even truly affordable housing – they simply add to the over-supply of market housing, with a small percentage of 'affordable' housing at 80% of market price or rent.

- The Local Plan Affordable Housing strategic policy states that, depending on the type and scale of development, sites should provide between 10% & 45% as "affordable" homes. Of that percentage, at least 70% of the total should be social rented and/or affordable rented properties and the remaining 30% should be low-cost home ownership, to include shared ownership and/or First Homes. Given the high cost of rented properties in the District and an ongoing shortage of supply, together with the increased cost of living, the Council's preference is for the delivery of socially rented homes, yet at the current time, the Local Plan has stated that affordable housing funding models limit the ability to deliver these homes.
- The Local Plan should commit to build more affordable, good quality homes at scale, and fast, where these are locally needed.
- The Local Plan should be focused on the delivery of high-quality, climate-friendly social homes. As well as being fundamental to tackle the housing crisis, building social homes would save the public finances by reducing the housing benefit bill and temporary accommodation costs.
- The Local Plan should be including council house building as the type of housing required to boost housing supply; there is an urgent need to help families struggling to meet housing costs, and tackle housing waiting lists. The stock of social homes has significantly reduced as councils have struggled to replace homes lost through Right to Buy. The housing shortage has seen rents and property prices rise significantly faster than incomes, acutely impacting the lowest income and vulnerable families and individuals. Compared to the private rental

sector and homes at affordable rent, social homes provide a genuinely affordable alternative and greater security of tenancy. There are currently not enough social homes to meet current demand. Over 1.2 million households are on the waiting list for social homes in England – including over 700 in Horsham, while almost 100,000 households are living in temporary accommodation, including 120,710 children.

- For many people, social housing remains the only feasible option due to the widening gap between Local Housing Allowance (LHA) and market rents. There are currently not enough social homes to meet current demand.

Following info from: [Local_Authority_Housing_Statistics_2021_22.ods \(live.com\)](https://live.com/Local_Authority_Housing_Statistics_2021_22.ods)

For the year 2021 to 2022 Authority Housing stats for Dwelling stock show that Horsham District Council own no social housing as at 31 March 2022 (social or affordable rent).

- 705 households were on the waiting list (and if you have any rent arrears you cannot be on the waiting list). 172 are homeless (regardless of whether there is a statutory duty to house them)
- 271 Private Registered Provider dwellings let to households

3. Transport implications

a) Increased traffic from the strategic sites

Probably the most unsustainable aspect of the West of Ifield proposal is the broader transport strategy. Access to the site is very poor – it is peripheral to Crawley and remote from any strategic road infrastructure. West of Ifield is the least well connected of all the proposed strategic sites to existing major roads. The current plan does nothing to solve that.

- The roads connecting the site to Crawley or to any major roads have insufficient capacity – they're either country lanes or small suburban roads. In planning terms, the peripheral location of the West of Ifield site does not allow for appropriate opportunities to promote sustainable transport modes and its development would be contrary to both the NPPF sections 106 and 110.
- There are no A or B class roads in or around the Parish, only C, and all are narrow country lanes (5.2m wide or less), lack footpaths (except the junction of Charlwood Road and Ifield Avenue) and are heavily used by agricultural machinery, cyclists and equestrians. The only bus route runs along the Charlwood Road. There are several rat-runs through the parish at peak times, which can be very dangerous to residents.
- Rusper's rural road network and roads through its villages are suited to local traffic densities and are unsuited to carrying the density of through traffic. The roads are narrow with blind corners, no lighting, no kerbs and used extensively for recreational purposes (cycling & equestrian).
- The capacity of the Parish's road network to carry the increased traffic that the housing allocation will generate and cope with the increase without risks to road safety are matters of deep concern in the light of predictable traffic movements from the two main strategic sites.
- In the case of the North Horsham development, the 'rat running' evidence base demonstrates drivers have a preference at peak times to avoid congestion on the southern approaches to Crawley by using Rusper's road network and this 'rat running' preference is likely to intensify with the convenience of a new multi carriageway road through the West of Ifield estate. In the case of the West of Ifield development, traffic to and from a southerly or westerly direction will have no alternative to using Rusper's road network and traffic to and from an easterly or northerly direction will have no alternative to using urban residential roads in Crawley Borough.
- Traffic assessments for the strategic developments in Rusper Parish and its immediate vicinity have been addressed independently of each other, but it is self-evident those assessments are inadequate because the impact of traffic from the Local Plan's building allocation will be cumulative. This cumulative impact is recognised by the Council's policies re; Chapter 8 issue box bullet 7.

- It is our view that the Local Plan is negligent by not giving attention to this matter in order to ensure the Rusper road network has the capacity to safely carry the expected additional density of traffic stemming from the building allocation to Rusper Parish and its immediate vicinity.

b) Improvements to buses, rail and active travel

NPPF paragraph 73 states (inter alia) that developments (including a genuine choice of transport modes) are supported by the necessary infrastructure and facilities.

Bus companies seem reluctant to extend routes to include North of Horsham, and no evidence is presented to indicate that this will be different for West of Ifield

No plans are included to meaningfully increase rail capacity or station car parks, which would be needed at the local stations.

c) Improving safety for recreational road users

The lanes in Rusper and Ifield most at risk from increased traffic volumes are heavily used by cyclists, walkers and equestrians – both riding and carriage-driving. How will Homes England ensure these road users are protected from increased traffic rat-running on narrow twisty lanes? Will Homes England or developers be widening the lanes and providing footpaths and cycle paths? And pressing for additional bridlepaths? We expect to see all these forms of ‘active travel’ being supported across Rusper Parish, not just within the development site.

4. Infrastructure provision

a) Issues of water shortage across the south-east region

The severe water stress in the south-east is mainly caused by lack of investment by the water companies supplying the area, and rapidly increasing demand as populations expand due to house-building. Plus climate change is not helping.

Solving these problems will not be quick, cheap or easy. The water companies are struggling financially and reputationally, and there must be a high degree of uncertainty around their futures. Reducing the daily water usage by households and businesses by water saving measures must also be blighted by uncertainty. And climate change seems set to worsen, exacerbating water shortages in the south-east. So why build such a concentration of the UK’s new housing in this region?

Increased flooding along the River Mole

The West of Ifield site sits in the Upper Mole Valley on heavy Wealden clay and is very prone to flooding. Two rivers run across the site – both of which are immediately surrounded by Flood Risk Zones 3 – and they meet towards the north of the site before flowing towards Gatwick. The bulk of the houses and commercial buildings West of Ifield will be situated on the floodplain between these two rivers. Concreting over arable and green fields, which currently soak up rainfall, and installing drainage systems that allow rain water to run off more quickly into the river Mole will undoubtedly cause more flash flooding downstream if not on the site itself. As a local River Mole expert has explained ‘due to the catchment size, shape, relief, vegetation cover, soil, geology and geomorphology the river Mole naturally has a ‘flashy’ regime meaning it is vulnerable to severe flooding from intensive rainfall ... The natural characteristics of the River Mole catchment are exacerbated by climate change and development. Climate change means weather extremes will happen with greater magnitude and frequency. For the Mole catchment this means more frequent and more intense rainfall episodes that cause flash flooding and, for the foreseeable future, discharges of untreated sewage pollution.’

To what extent is HDC collaborating with Mole Valley District Council?

Long term strategy for waste water management

The two closest Waste Water Treatment Works (WwTWs) at Crawley and Horley are at capacity and are already discharging sewage into the River Mole beyond their permitted levels in storm conditions. Both are on Thames Water’s list of 250 WwTWs to be upgraded, but upgrading is not the same as increasing capacity to deal with ‘000s of additional houses. It’s not clear there are any plans for new sewage treatment works, just ‘improvements’ to existing ones, which are unlikely to satisfy the demand and lead to more raw sewage overflowing into our rivers. And if the necessary additional capa-

city is planned and funded, it's likely to take 10 years to deliver. All this against a backdrop of uncertainty about Thames Water's future due to their dire financial position.

b) The long term issues of electrical power production and distribution

North Horsham development had to modify one of the planning conditions to reduce the number of charging points per property due to the lack of supply which has caused issues with delivery of enough electric car charging ports.

c) Health care

Former Horsham councillor Christine Costin has long championed the need for better medical services. And she spoke out again recently after the Government announced proposals aimed at improving public access to GPs. "The NHS is crumbling away," she said. And, she added: "The truth is simple, in and around Horsham we do not have enough GP surgeries, not enough doctors and staff to serve the population." For many years now there have been huge developments in the area without the extra infrastructure to cater for the vast increase in population. Those surgeries that we have are full to the brim. This must pose a risk to the health and welfare of local residents since health care capacity has not kept pace.

The healthcare situation in Crawley and Horsham is dire, but with little evidence of long-term planning as required by the NPPF.

Given Horsham's population growth there is urgent need for improved hospital services in the district, particularly since Crawley Hospital was downgraded leaving East Surrey Hospital in Redhill, and Worthing Hospital, as prime medical sites to serve much of West Sussex. Horsham residents now face a 45-minute journey to get emergency care. East Surrey Hospital cannot cope with the demand generated by the level of development in the region, but there are no plans for a new hospital. Access to East Surrey Hospital is difficult with constant congestion in the area, limited parking at the hospital and poor public transport (which itself gets caught up in the traffic).

Crawley's GP and dental surgeries are already over-subscribed and national GP, dentist and health staff shortages make change unlikely. Currently it is hard to register with a local preferred GP and people are generally assigned to one – Kilnwood Vale residents are being assigned to GPs in Horsham. And there are no dentists in Crawley taking NHS patients. The new development at Forge Wood has an allocation for a surgery but no GPs will take on the running of the surgery.

This is the situation now – more development in our area will only exacerbate these shortcomings.

5. Water neutrality

We note that that lack of water will affect all possible sites in the new plan, it's the excessive house-building numbers that are the real problem.

There are concerns shared by local residents about the Council's commitment to conservation and environmentally sustainable water supply in a stressed geographic region that relies on river water.

The July High Court judgement has brought into sharp focus those concerns. Compared with Somerset CC that had stood up for its responsibilities to protect the environment, it appeared HDC had misinterpreted the Habitats Regulation to prevent environmental responsibilities interfering with its building plans and the Council's response to the High Court judgement looks like minimal policy realignment to comply with the correct interpretation of regulation instead of policy changes to reset and treat environmental protection as a priority responsibility.

Parishes like Rusper that had 'made' Neighbourhood Plans prior to Natural England's position statement will, in the light of the High Court judgement, by law have to demonstrate water neutrality in their responses to Local Plan housing allocations and in view of the scale of the allocation to Rusper Parish, water neutrality in its Neighbourhood Plan revisions will be treated as an issue of critical importance.

Set against that responsibility we have doubts that some areas of the Council's water neutrality strategy are robust. There appears to be a structural flaw that undermines its integrity and over ambitious or unrealistic assumptions that together represent a 'forwards and upwards in all directions at once' solution that will have a low probability of achievement.

The Council's projections of water demand submitted to the Sussex North Water Resource Zone and used for determining policies in its strategy were calculated before the High Court judgement. The numbers appear to exclude housing on developments with outline planning consent, and statements made in the strategy document revealing the misinterpretation of the habitats Regulation, appear to confirm that exclusion.

This apparent structural flaw in the neutrality strategy is highly significant - it affects in the order of 6,000 houses, bar a few hundred, that had full consent prior to the High Court judgement. It has also important implications, in that developments with outline planning consent are required to demonstrate neutrality instead of being available to provide offsetting.

There are three main assumptions that appear over ambitious or unrealistic:

- a. Water usage; 85 litres per day is credit worthy as a target but over ambitious for conservative planning when set against Southern Water's and WRSE's targets of over 100 litres per day by 2050.
- b. Offsetting; given prominence as the means for individual developments to achieve neutrality but both the availability of existing housing to provide offsetting to Horsham District's developments from within the District or from partner authorities in the Water Resource South East alliance (WRSE) and the deliverability of offsetting are imprecise and uncertain.
- c. Increased water supply; Horsham District's neutrality is highly dependent on Southern Water's leakage reduction in its Water Resource Management Plan that is out of the Council's control to determine and is unexplained in the strategy; alternate means of water supply (rain water harvesting and grey water recycling) are given only vague reference; of particular significance, although WRSE's infrastructure developments plans are impressive, they have long timeframes stretching out to 2035 or 2075 and increased supply from new infrastructure to counterbalance a deficit in water supply predicted about half way through the duration of the Local Plan is not identified.

It is our view therefore that the Council, in order to embrace its special responsibilities for safeguarding sustainable water supply should address a wide array of issues that make its neutrality strategy vulnerable to non-achievement and also give more attention to the means of controlling and sanctioning performance compared with commitments at the levels of individual developments, Parishes and the County.

6. Disregard for adopted plans and planning assessments

Rusper Neighbourhood Plan

Why does the Plan not mention Rusper's adopted Neighbourhood Plan in either Policy HA2 or HA15? In virtually all other Strategic Site policies and Settlement policies the relevant Neighbourhood Plans are referenced repeatedly, but not Rusper's - Why not?

Rusper's Neighbourhood Plan (adopted 2021) was based on a high level of participation from the local residents and received the backing of the electorate in a referendum.

The Neighbourhood Plan's vision is to:

“Value, protect and promote the unique rural parish ... ensuring Rusper remains ... sustainable for people, wildlife and the environment generally.”

The vision includes a key objective to **preserve and enhance our green spaces**.

The Rusper Neighbourhood Plan considered the sites to the West of Ifield and in line with all of Horsham District Council's recent SHELAA's found this not suitable for development.

As well as it being a legal requirement for Horsham District Council to respect the statutory status of the Rusper Neighbourhood Plan, the Horsham Local Plan should also align with the manifesto pledges of the new council leadership and the local councillors.

7. Biodiversity

One of the largest parishes in Horsham District but with one of the lowest populations, Rusper is a distinctly rural parish. It is comprised of the Upper Mole Valley –home to the source of the River Mole – and is bordered by the High Weald Area of Outstanding Natural Beauty, Warnham, Colgate and Crawley. Its character is one of small, vibrant communities – Rusper village, Lambs Green, Ifield Wood – set in a patchwork of farmland, woodland and semi-wild areas. Heavily used for recreation and exercise, the network of walks includes the Sussex Border Path and a ‘green walk’ from Rusper through Lambs Green on to Ifield. The successful pubs also add to the rural character. The West of Ifield site is Crawley’s only remaining ‘rural fringe’ and it should be protected for Crawley residents, as stated in Crawley Borough Council’s draft Local Plan.

The West of Ifield proposals will be devastating for Rusper Parish and for biodiversity. The proposed 3,000 site is phase 1 of a future 10,000 house proposal which would occupy 1,500 acres – 25% of the parish – land which is currently agricultural, woodland and golf course. 75% of the development site is identified as Biodiversity Opportunity Area - rich Low Weald habitat with House Copse Site of Special Scientific Interest (SSSI) at its heart, surrounded by a network of ancient and priority woodland, shaws and hedgerows. At least 320 acres of priority woodland would be destroyed or impacted, of which 150 acres is designated as ancient woodland.

Although Rusper, like much of Horsham district, is poorly surveyed and under-recorded in terms of species and habitat, everything points to it being rich and valuable. Many rare and protected species have been recorded, including colonies of Bechstein’s bats roosting across the proposed development sites. Bechstein’s and Barbastelle bats are the qualifying species behind the designation of Ebernoe Common and The Mens as Special Areas of Conservation (SACs) and national bat expert Martyn Cooke³ advises:

‘When considering its Local Plan, Horsham DC must consider the presence, and importance, of the Bechstein’s colony in the area shown above [north of the District and upper Mole Valley]. Large scale development should not be permitted and for small scale developments safeguarding measures should be implemented to ensure compliance with Annex II species legislation, such as minimal lighting etc. It should be pointed out that if the letter of the European Habitats Regulations were followed, Natural England should designate the area as an SAC.’

In terms of habitat and landscape, expert ecologists and naturalists recognise the value of the area:

WSCC’s Landscape character assessment of West Sussex⁴ recognises the ‘Blocks and strips of interconnecting woodland, including a large number of blocks of ancient woodland ... important for tree species such as small-leaved lime and wild service tree’ and that ‘some localities retain an enclosed rural character, for instance, west of Ifield.’

‘The heavy Wealden clay covering most of our area is not favourable for large scale arable agriculture therefore field sizes have remained small. Ancient Hedgerows and mature hedgerow trees, particularly Oaks have remained intact and the area contains numerous small copses which are all well connected. Large amounts of ancient/semi-ancient woodland also survive as do small field ponds. This mosaic of landscape features is crucial for the Bechstein’s to survive and prosper.’ Martyn Cooke – Surrey Bat Group

8. Farming and agriculture

Britain is running out of land for food and faces a potential shortfall of two million hectares by 2030 according to new research.

- A growing population plus the use of land for energy crops are contributing to the gap.
- The total land area of the UK amounts to over 24 million hectares with more than 75% of that used for farming.

³Martyn Cooke is a Natural England licenced bat worker holding both Class 3 and Class 4 bat licences. Since 2012 he has organised the Mole Valley Bat Project which mainly focuses on the local Bechstein’s bat population. He is a member of the UK Bechstein’s Bat Study Group and the Mole Valley DC Conservation Group. He is also an active member of both Surrey and Sussex Bat Groups.

⁴ <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/> LW4 and LW8.

- Overall the UK runs a food, feed and and drink trade deficit of £18.6bn.
- With a population expected to exceed 70 million by 2030, the extra demand for living space and food will have a major impact on the way land is used, the report says.
- Another factor is the EU, in the shape of the Common Agricultural Policy which now requires farmers to put more land aside to protect nature.

It seems that despite the obvious need to improve and develop farming in the area, Horsham District Council are intent on ignoring this aspect of land use and are focusing all their strategic sites on new housing.

9. Golf provision

Ifield Golf Course is well-used, much-loved and definitely not surplus to requirements. The course is 100 years old, beautifully landscaped with historically important design and provides valuable greenspace for walkers and dogs. Plus it is part of the Rusper Ridge Biodiversity Opportunity Area bordering Hyde Hill Woods – ancient woodland designated as Local Wildlife Space.

If Homes England are unable to show that the course is surplus to requirements then, as required by the NPPF, an equivalent facility will have to be provided, and will need to be in use before the existing club is closed. This will delay the start of construction on the course by at least 4 years, and potentially longer. Does this threaten the deliverability and viability of the Plan?

10. Environmental Health

The West of Ifield site is Crawley's only remaining 'rural fringe' and should be protected for Crawley residents, as Chesworth Farm is for Horsham residents. It would be inconsistent and more than a little ruthless to take away from Crawley residents what Horsham is so carefully protecting for its own.

This site is also less than a mile from the Gatwick flight path and the impacts of noise and air pollution would be a significant impact for those living in this area. The bulk of this site will lie within the 57dB noise contour.

11. Deliverability and viability

As noted previously if a new golf course is required this will delay house-building by at least 4 years, or 7 years if done properly.

Similarly, if a new waste treatment facility is needed this would delay the start of building by 10 years.

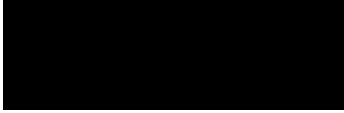
More generally, this is an expensive site in terms of infrastructure requirements. Is Homes England funding all of this? Their ability to deliver infrastructure is questionable.

As is their capability to build the required number of houses per year for previous projects. This project is much larger than anything Homes England have previously successfully completed.

Has the viability risk for developers been adequately assessed and mitigated? There must be significant pressure on the viability of the West of Ifield:

- a. Which infrastructure will be funded by developers?
- b. Current and future housing market and economic uncertainty is a big issue, particularly given the Bank of England predicts interest rates will remain high for several years, hitting borrowing costs of both developers and house buyers.
- c. , High costs of labour, inputs and borrowing will all lead to developers restricting supply to encourage higher prices. In other words, a significant risk to the rate of delivery of new housing.
- d. Homes England has also committed to 35% affordable housing claiming this will definitely be delivered – is this really viable?
- e. The high sustainable design standards required by the Plan policies will also impact costs.

Yours sincerely



Lisa Wilcock
Clerk to Rusper Parish Council

Enc. Rusper Parish Council Transport Survey

Cc Strategic Planning, District Councillor Liz Kitchen, District Councillor Tony Hogben, Jeremy Quin MP, Rusper Parish Councillors.

The Myth of Bio-Diversity Net Gain in West of Ifield

Homes England promise to deliver a 10% bio-diversity net gain, but it is obvious from a simple overview of the proposed site that this is impossible.

This document provides a simple walk through of the proposed Homes England West of Ifield site from west to east and identifies the wide range of habitats that it would be difficult to find in an equal area anywhere in the UK, let alone within the Horsham District. From young woodland plantation to ancient woodland encompassing arable and grazed farmland, with marshy areas and water ways rich in wildlife alongside ancient meadows that host a range of wild flowers. This all supports a huge range of birds, fish, mammals, amphibians and reptiles.

Starting in the west of the site, we have a large young woodland plantation interspersed with mature tree specimens. This forms the surround for an area of managed mowed grassland with sand traps and water hazards that make up the area of Ifield Golf Course. This range of habitats supports a number of native species and migrating birds.

Progressing east from here we enter arable farmland with fields planted with a range of crops and surrounded by mature and ancient hedgerows.

Further east we move into grazed farmland, again surrounded by mature and ancient hedgerows.

Further to the east we enter areas of ancient woodland, mostly undisturbed by human interaction.

Running through all this we have the river Mole and Ifield Brook flowing out of the Ifield mill ponds. And to the south, open grass and wild flower meadows.

To the north we have marshy areas that form the Ifield Conservation Area, an area of varied habitats in marshy reeds and tussock grasses between the ancient woods.

This wealth of inter-connected habitat areas forms a kaleidoscope of places for the huge variety of flora and fauna to breed and thrive and it challenges anyone to find a wider range of habitats in such a connected arrangement anywhere.

The whole area forms part of one of the key wildlife corridors identified within the made Rusper Neighbourhood Plan and as such deserves very careful consideration. More recently, it has become clear that the area also supports a breeding colony of rare Bechstein bats. It is clear that a development of the proposed scale would destroy this important environmental area.

Even if extreme efforts are made to protect key areas, it is impossible to see any way in which this area could be enhanced in bio-diversity terms and destroying even half of this area would result in a significant bio-diversity loss.

The current Horsham District Planning Framework (Ref. 5.2) includes an Objective Theme “to safeguard and enhance the environmental quality of the district, ensuring that development maximises opportunities for biodiversity and minimises the impact on environmental quality including air, soil, water quality and the risk of flooding.”. It is hoped that given the current Climate Emergency, the new Horsham Local Plan would include a similar or enhanced objective and that objective would rule out any significant development in this area.

Horsham District Local Plan
Reg 19 consultation draft

Proposed strategic site allocation Policy HA2:
Land West of Ifield

Independent Landscape Report

in support of representation by Rusper Parish Council

February 2024

NEIL WILLIAMSON ASSOCIATES
ENVIRONMENT ~ DESIGN ~ PROJECTS ~ MANAGEMENT

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SUMMARY

1. This report considers the landscape implications of the proposed site allocation and the adequacy of the environmental information available to inform the planning decision-making process in relation to the site. It has been commissioned by Rusper Parish Council.
2. The sustainability appraisal makes clear that it only addresses the land proposed for 3,000 homes. However, the proposed development of 3,000 homes cannot be divorced from potential further development leading to a total of 10,000 homes, or from the construction of the entire western link road. The proposed allocation therefore needs to consider the environmental implications of the construction of the whole of the western link road and of potential residential development of 10,000 homes.
3. The proposed HA2 allocation for 3,000 homes cannot be considered in isolation from the stated aspiration of the site promoter to deliver 10,000 homes. To seek to do so as the Reg 19 draft Local Plan does is illogical and incompatible with the principles of good planning.
4. The development of 3,000 homes as proposed in the draft Local Plan on a rural site of acknowledged landscape sensitivity would inevitably result in adverse landscape and visual effects, which in my view would include many that would be significant in EIA terms. Insufficient evidence has been provided to demonstrate that these adverse effects could be reduced to an acceptable level through embedded or secondary mitigation measures.
5. There is a serious deficit in the level of environmental information available and a lack of clarity over the proposed development including a seriously inadequate masterplan. The extent of these deficiencies is particularly apparent in the context of the stated aspirations to deliver a 'garden town' and a 'landscape-led' development.
6. The West of Ifield allocation site is being proposed without any Landscape and Visual Impact Assessment (LVIA) having been made publicly available. It appears that Homes England has carried out at least some level of LVIA work, but it is not known to what level of detail it was undertaken and it has not been made publicly available.
7. Given that full LVIA studies are routinely undertaken either by the local planning authority or by the scheme promoter for much smaller housing allocation sites, it is a reasonable expectation that, before any decisions are taken to confirm site allocations, a full LVIA should be undertaken for a proposed development of 3,000 homes on rural land identified as being sensitive in landscape terms.
8. The EIA scoping report gives rise to serious cause for concern over the approach that Homes England proposes to adopt in relation to landscape and visual impact assessment.

9. There are significant deficiencies in the Council's sustainability appraisal in relation to the proposed allocation, most notably the attempt to divorce the proposed allocation for 3,000 homes from the linked aspiration by the same promoter for 10,000 homes.
10. Neither the overall impact on tranquillity nor the more specific impact on light pollution have been adequately assessed by the Council in the draft Local Plan [1] or the accompanying Sustainability Appraisal [2]. Any large-scale new residential development will have an impact on tranquillity, and this impact has not been quantified. Neither the landscape nor the ecological significance have been addressed in any meaningful way by the Council in its site allocation processes. Neither proposed Policy HA2 nor its supporting text make any mention of the harm that would be caused by loss of tranquillity and increase in light pollution.
11. Both the HA2 land and the 10,000 scheme land currently enjoy a high degree of tranquillity, comparable to levels within many parts of the High Weald National Landscape (AONB), and indeed are more tranquil than some parts of the National Landscape immediately south of the A264.
12. Although it is subject to some aircraft noise from the nearby Gatwick airport, the HA2 land benefits from dark skies and very low levels of light pollution, notwithstanding the proximity of Crawley and the airport.
13. Residential development would inevitably bring increased levels of noise, traffic, artificial lighting and human activity that would have a radical and adverse effect on the peace and tranquillity of this rural land.
14. It is inevitable that the proposed development would result in a loss of tranquillity. In my view the increase in light pollution from residential development of 3,000 homes in this location would be likely to be considerable, and that of the development of 10,000 homes would be correspondingly greater.
15. Were development of 10,000 homes to occur, this would result in a coalescence of settlements contrary to current and proposed local plan policy. The likelihood of initial development of 3,000 homes leading to ultimate development of 10,000 homes is substantial.
16. The need for mitigation to address adverse landscape and visual impacts is acknowledged in the EIA scoping report but inadequate information has been provided to establish the nature of the proposed mitigation measures and how effective they might be.
17. There is no evidence that landscape and visual impacts have been adequately considered in the current development proposal or that the key 'garden settlement' principle of enhancing the natural environment would be met.
18. The draft Local Plan fails the test of soundness in respect of proposed allocation HA2 West of Ifield because:

- (1) Appropriate and proportionate evidence on the landscape implications of the proposed development has not been provided; and
- (2) 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, it does not comply with the requirements of paragraphs 174 and 176 of the NPPF.

1 Introduction

- 1.1 I am a Fellow and Past President of the Landscape Institute, now working as an independent consultant. I have over 35 years' experience of environmental planning and design, including many years as Head of Environmental Design at New Forest District Council, and have presented landscape evidence at Public Inquiry for numerous sites, including sites in and around the High Weald National Landscape (AONB). Current clients include Bath & North East Somerset Council for whom I regularly provide landscape and design advice to on the implications of development proposals within the City of Bath double World Heritage Site and its setting, and within or affecting the setting of the Cotswolds and Mendips National Landscapes. A summary of my qualifications and experience is given in Annex 2.
- 1.2 The Reg 19 draft Local Plan proposes an allocation of land West of Ifield (Policy HA2) for new residential development of 3,000 homes, but the stated aspiration of the scheme promoters Homes England is to deliver 10,000 homes covering a more extensive area. These will be referred to in this report as the '3,000 scheme' and the '10,000 scheme' respectively.
- 1.3 My report considers the landscape implications of the proposed site allocation and the adequacy of the environmental information available to inform the planning decision-making process in relation to the site. It has been commissioned by Ruspur Parish Council.
- 1.4 I viewed the proposed allocation land and the surrounding area from publicly accessible locations during November 2022, including daytime and night-time observations, and have based my report on publicly available sources of information and on my own experience.

2 Proposed development allocation

Linkage of 3,000 scheme and 10,000 scheme

- 2.1 The draft Local Plan [1] proposes a strategic allocation of land West of Ifield (HA2) for residential development of 3,000 homes, but the stated aspiration of the scheme promoter (Homes England) is to secure a much larger growth area of residential development of 10,000 homes. Residential development (of either 3,000 or 10,000 homes) in this area would be dependent on the construction of a 'Western Link Road' for which land is proposed to be safeguarded in the draft Plan (referred to as the 'Crawley Western Multi-Modal Corridor').
- 2.2 The strategic allocation is referenced SA101 in the sustainability appraisal [2] and suggests that the proposed development of 3,000 homes would include the 'first phase of a potential future western link road from the A264 to the A23 in the north'. In order to function as a link road, the proposed new transport route needs to be connected at both ends, and indeed this is what the safeguarded corridor in the draft Plan proposes.
- 2.3 The sustainability appraisal makes clear that it only addresses the land proposed for 3,000 homes. However, the proposed development of 3,000 homes cannot be divorced from potential further development leading to a total of 10,000 homes, or from the construction of the entire western link road. The proposed allocation therefore needs to consider the environmental implications of the construction of the whole of the western link road and of potential residential development of 10,000 homes. There is no reference in the sustainability appraisal to the landscape implications of the construction of either the whole of the western link road or to the section of it that would run through the SA101 land, so it is unclear whether or not there has been any assessment of this.

'Garden towns' and 'landscape led' development

- 2.4 The sustainability appraisal refers to the site promoter Homes England's description of the proposed development as a 'garden town' and suggests that there is a commitment to a 'landscape-led' scheme of development.
- 2.5 As a public body sponsored by the Department of Levelling Up, Housing and Communities, it is assumed that Homes England will be aware that the government uses the terminology 'garden towns' and 'garden cities' for developments of more than 10,000 homes and 'garden villages' for developments of 1,500 – 10,000 homes [DCLG 2016 'Locally-led Garden Villages, Towns and Cities'] [3]. It is abundantly clear that Homes England see the 3,000 homes as merely the initial phase of a much larger development.

- 2.6 The proposed HA2 allocation is accompanied by a rudimentary diagrammatic masterplan (Fig 7: Reg 19 draft Plan, p193) [1]. The EIA scoping report [4] refers to the existence of a 'landscape masterplan' but this does not appear to be publicly available. Many developers claim that their intention is to bring forward 'landscape-led' schemes, but sadly in my experience results on the ground rarely reflect such commendable aspirations. If the stated aspirations to create a 'landscape-led' form of development and a 'garden town' of whatever size are to be taken seriously, and are not merely empty rhetoric, then as an absolute minimum they would need to be supported by evidence of robust landscape analysis and a detailed landscape masterplan. To date, there is insufficient evidence of analysis or landscape masterplanning to give any confidence that the stated aspirations would be realised.

Western link road

- 2.7 The belt of land safeguarded for the Western Link Road is approximately 140m wide and 6km in length, so covers an area of approximately 84 hectares, the majority of which lies within areas identified in the 2021 landscape capacity assessment [2] as being the most sensitive in landscape terms, being unable or having only very limited potential to accommodate development. Although the 2021 assessment focussed in particular on capacity to accommodate housing or employment development, it is reasonable to conclude that areas with the lowest capacity to accept those categories of development are also the least likely to be able to satisfactorily accommodate major transport infrastructure without unacceptable adverse impact.
- 2.8 The proposed link road would most notably affect Local Landscape Character Areas 4, 8 and 10 of the 2021 assessment.

3 Landscape policy context

National policy

- 3.1 Although there were further changes made in December 2023, national policy relevant to this plan is set out in the National Planning Policy Framework September 2023 (NPPF), which gives strong support for good design and for protection and enhancement of natural and historic environmental assets. NPPF paragraph 174 requires planning policies and decisions to contribute to and enhance the natural and local environment by (inter alia):
- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)*
 - b) Recognising the intrinsic character and beauty of the countryside...*
- 3.2 The High Weald National Landscape (AONB) is a 'valued landscape' for the purposes of paragraph 174. In addition, NPPF paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in nationally designated landscape areas (National Parks, the Broads and AONBs), which have the highest status of protection in relation to these issues, and that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated area.
- 3.3 The NPPF also puts considerable emphasis on the historic environment and sets out requirements for the protection and enhancement of designated and non-designated historic assets, including their setting (paragraphs 189–208). The Ifield Conservation Area is a designated heritage asset whose setting would be affected by the proposed development.
- 3.4 NPPF paragraph 185 requires that policies and decisions should ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to the impacts that could arise from the development. The word pollution in this context explicitly refers to noise disturbance and light pollution, and the policy requirements include:
- a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – avoid noise giving rise to significant adverse impacts on health and quality of life; and*
 - c) Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*
- 3.5 A fundamental principle of the planning system is that decisions should be evidence based, and that the level of information made available to support good decision-making should be proportionate to the scale, scope and

significance of the development or policy under consideration. NPPF paragraph 35 sets out tests of ‘soundness’ for Local Plans and emphasises that plans and strategies must take into account reasonable alternatives and be based on proportionate evidence.

Local plan policy

- 3.6 The adopted local plan is the Horsham District Planning Framework (Nov 2015) [5] and the emerging local plan is the Reg 19 draft Horsham District Local Plan 2023-40 (Dec 2023) [1].

Horsham District Planning Framework 2015

- 3.7 The Planning Framework states (para 3.10) that

‘The rich heritage and high quality natural environment and the significant contribution this makes to the overall attractiveness, economic competitiveness and identity of the district is recognised and promoted...’

- 3.8 It further states (para 3.26) that

‘...the environment and character of the district play a key role in the local and wider economy through environmental services that it provides... ..it is therefore critical that the character (of) the district is conserved and enhanced...’

- 3.9 Policy 2 (Strategic Development) states its overall purpose as being:

‘To maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth...’

Goal (1) is to “focus development in and around the key settlement of Horsham”

Goal (6) is to “manage development around the edges of existing settlements in order to prevent the merging of settlements and to protect the rural character and landscape”.

Goal (12) is to “retain and enhance natural environmental resources, including landscapes and landscape character...”

- 3.10 Policy 4 (Settlement Expansion) states that the expansion of settlements will be supported where:

(1) The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge... and

- (5) *the development is contained within an existing defensible boundary and the landscape and townscape features are maintained and enhanced.*

- 3.11 Policy 25 (Natural Environment and Landscape Character) protects the natural environment and landscape character from inappropriate development and requires development to 'Protect conserve and enhance landscape and townscape character... and ...maintain settlement separation.'
- 3.12 Policy 26 (Countryside Protection) protects the rural character and undeveloped nature of the countryside from inappropriate development and requires development to avoid causing a significant increase in the overall level of activity in the countryside and to protect and/or conserve and/or enhance the key features and characteristics of the landscape character area in which it is located.
- 3.13 Policy 27 (Settlement Coalescence) protects landscape from development which would result in the coalescence of settlements and sets out four tests that development between settlements must satisfy if it is to be deemed acceptable:
- (1) *No significant reduction in openness and 'break' between settlements;*
 - (2) *Does not generate urbanising effects within the settlement gap, including artificial lighting, development along key road corridors, and traffic movements;*
 - (3) *Is redevelopment of an existing site and reverses existing urbanising character;*
 - (4) *Contributes to the conservation, enhancement and amenity of the countryside.*
- 3.14 Policy 30 (Protected Landscapes) requires the natural beauty and public enjoyment of protected landscapes including the High Weald AONB to be conserved and enhanced. It requires proposals to have regard to the management plan for the landscape in question (in this instance the High Weald AONB Management Plan 2019-2024: 4th Edition) and to demonstrate how the key landscape features or components of natural beauty and the setting of the protected landscape will be conserved and enhanced.
- 3.15 Policy 34 (Cultural and Heritage Assets) requires development proposals to 'retain and improve the setting of heritage assets, including views, public rights of way, trees and landscape features, including historic public realm features.'

Horsham District Local Plan - Reg 19 draft 2023

- 3.16 Strategic Policy 3 (Settlement Expansion) of the draft Plan requires development to be 'contained within an existing defensible boundary and the landscape and townscape features are maintained and enhanced.'

- 3.17 Strategic Policy 11 (Environmental Protection) of the draft Plan requires development to minimise light pollution, and specifically to minimise the impact of lighting on neighbouring uses and on the wider landscape.
- 3.18 It also requires the ‘cumulative impact of all relevant committed development to be appropriately assessed’.
- 3.19 Strategic Policy 13 (Natural Environment and Landscape Character) of the draft Plan broadly carries forward Policy 25 of the adopted Plan and similarly protects the natural environment and landscape character from inappropriate development and requires development to:
- (1) Protect, conserve and enhance the landscape and townscape character... and ...maintain settlement separation.
- 3.20 Strategic Policy 14 (Countryside Protection) broadly carries forward Policy 26 of the adopted Plan and protects the rural character and undeveloped nature of the countryside from inappropriate development. It requires development to be appropriately integrated within the landscape and to be of a scale appropriate to its countryside character and location, and to avoid causing a significant increase in the overall level of activity in the countryside and to protect and/or conserve and/or enhance the key features and characteristics of the landscape character area in which it is located.
- 3.21 Strategic Policy 15 (Settlement Coalescence) broadly carries forward Policy 27 of the adopted Plan but clarifies and strengthens it. The policy protects landscapes from development which would result in the coalescence of settlements in order to protect local identity and a sense of place. It specifies the requirements to be met as:
- a) There is no significant reduction in openness and ‘break’ between settlements;
- b) The related urbanising effects within the retained ‘break’ between settlements are minimised, including artificial lighting, development along and/or the widening of the roads between settlements; and increased traffic movements;
- c) Proposals respect the landscape and contribute to the enhancement of their countryside setting including, where appropriate, enhancements to the Green Infrastructure network, the Nature Recovery Network and/or provide opportunities for quiet informal countryside recreation.
- 3.22 Strategic Policy 16 (Protected Landscapes) broadly carries forward the requirements of Policy 30 of the adopted Plan and includes an additional requirement relating to dark skies. The policy requires the natural beauty of the High Weald AONB to be conserved and enhanced, and that there will be no adverse impacts on the natural beauty of the protected landscape. It requires proposals to have regard to the relevant landscape management plan (in this instance the High Weald AONB Management Plan 2019-2024, 4th Edition [6]).

Neighbourhood Plan

- 3.23 The Ruspur Neighbourhood Plan 2018-2031 [7] was made on 24 June 2021 and now forms part of the statutory development plan for the parish of Ruspur. As part of the plan making process, the Neighbourhood Plan has been confirmed to satisfy the four ‘basic conditions’, namely that it is consistent with national planning policy, is consistent with local planning policy, promotes the principles of sustainable development and meets the requirements of European law.
- 3.24 In relation to housing development, the Neighbourhood Plan follows the 2018 HDC SHELLA map [8] and takes the position that there are no additional sites suitable for large scale housing in the parish beyond those areas for which planning permission has already been given.
- 3.25 Neighbourhood Plan Policy RUS10 (Dark Skies) requires all new development to be designed to minimise light pollution and stipulates that all new proposals must demonstrate how light pollution will be prevented.

High Weald AONB Management Plan

- 3.26 Horsham District Council has a legal duty under section 85 of the CROW Act 2000 to have regard to the purposes of the AONB (now known as a ‘National Landscape’) in making decisions that affect the designated area. In terms of planning policy, landscape outside a designated AONB has a lower degree of protection than landscape within the AONB, but the local planning authority must consider the effect of development outside the designated area on the setting of an AONB.
- 3.27 The objectives of the High Weald AONB are set out in its Management Plan 2019-2024 (4th Edition) [6]. Among the key characteristics of the AONB identified in the Management Plan under the heading ‘Other perceived qualities’ (page 59) are:
- *Scenic beauty and glimpsed long views*
 - *Unspoilt rural landscape with a sense of naturalness unusual in South East England*
 - *Intrinsically dark skies landscapes with a sense of remoteness and tranquillity*
 - *Human-scale landscape with a sense of intimacy.*
- 3.28 Objective OQ4 seeks to protect and promote the perceptual qualities that people value. The rationale reads:

‘To ensure that the special qualities people value, such as tranquillity, dark skies, sense of naturalness and clean air, are recognised and taken account of in AONB management.’

The indicator of success is set out as:

‘No loss of dark skies or tranquillity: HWJAC: CPRE tranquillity data and citizen science sky quality meter readings.’

4 Adequacy of environmental information

- 4.1 The UK planning system prides itself on being evidence-based. NPPF paragraph 43 states that ‘the right information is crucial to good decision-making’ and paragraph 35 sets out the tests that Local Plans are required to meet to be deemed ‘sound’. One of the tests is that Plans must be justified and must set out an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence.
- 4.2 The West of Ifield allocation site is being proposed without any Landscape and Visual Impact Assessment (LVIA) having been made publicly available. It appears that Homes England has carried out at least some level of LVIA work, but it is not known to what level of detail it was undertaken and it has not been made publicly available.
- 4.3 Given that full LVIA studies are routinely undertaken either by the local planning authority or by the scheme promoter for much smaller housing allocation sites, it is a reasonable expectation that, before any decisions are taken to confirm site allocations, a full LVIA should be undertaken for a proposed development of 3,000 homes on rural land identified as being sensitive in landscape terms.
- 4.4 It is inappropriate for the Council to consider the allocation of land for new residential development of the scale proposed in the absence of a full LVIA having been undertaken and made available. The reasonable requirement for proportionate evidence has not been met.

Environmental Statement scoping report

- 4.5 The covering letter to the 2023 EIA Scoping Report (EIASR) [4] submitted on behalf of Homes England indicates that preparations were well advanced by October 2023 for the submission of two planning applications, an outline for the principal elements supported by parameter plans and a masterplan, and a full application for early infrastructure.
- 4.6 The letter includes references to ‘increased design maturity’, ‘extensive surveys undertaken’ and ‘increased information to allow understanding of potential environmental effects’, so there is obviously a great deal of relevant information that now exists but, regrettably, very little if any of it has been made publicly available.
- 4.7 Paragraph 10.3.16 of the EIASR [4] helpfully confirms (with reference to Table 10.2) that landscape and visual effects at the ‘moderate’ as well as at the ‘major’ level are likely to be considered significant for EIA purposes.
- 4.8 Paragraphs 10.4.1 and 10.4.2 confirm that a considerable amount of survey and analysis has already been undertaken, including to ‘confirm the extent of the study area’ and to ‘confirm viewpoint locations’. Both of these are of

critical importance in ensuring that any LVIA is robust and covers the appropriate geographic area, but neither the extent of the study area nor the choice of viewpoints have been made public, denying the opportunity for informed comment by the communities affected.

- 4.9 The EIASR confirms (paragraph 10.4.4) that Ifield Conservation Area is a 'relevant landscape character and visual amenity related planning designation'. It should therefore be assessed within the LVIA using the same methodology as other landscape and visual receptors, rather than being scoped out of the LVIA and only dealt with within the Cultural Heritage chapter of the ES, which is likely to apply its own (different) methodology.
- 4.10 There appears to be a misunderstanding of GLVIA3 guidance [9]. Paragraph 10.4.6 indicates that landscape effects on the relevant National Character Area (NCA) will be scoped out of the LVIA. It is agreed that the effects on more local character areas will be greater, but given the scale of the proposed development it will be appropriate for the LVIA to include NCA 121 as a landscape receptor to be assessed in addition to the more local character areas. There is no justification in GLVIA3 for scoping out effects on the NCA.
- 4.11 There are numerous references to the 'LVIA study area' within the EIASR but no information has been provided as to the extent of the LVIA study area or how it has been determined.
- 4.12 The reference (paragraph 10.5.3) 'following the implementation of mitigation measures' is an explicit acknowledgement that there will be adverse effects that will require mitigation. The EIASR also confirms that night-time effects will be considered.
- 4.13 The EIASR (paragraph 10.5.4) acknowledges that there would be possible significant adverse effects on the landscape. However, given the references to mitigation at paragraphs 10.6.1 and 10.6.2 it is clear that Homes England recognise that there will definitely be adverse landscape effects.
- 4.14 Given that the allocation land is acknowledged in the strategic sustainability appraisal to be 'unfavourable' with respect to impact of residential development on the landscape, and that the threshold for significance has been set at 'moderate' or above in accordance with normal practice, it is inevitable that there will significant adverse landscape effects, and I anticipate that these would be widespread.
- 4.15 No evidence has been provided to justify the statement that the 'wider character area beyond the Site is not likely to experience significant effects due the high level of visual containment of the Site' and that this has therefore been scoped out. In the absence of such evidence, effects on landscape character beyond the site boundaries must be included in the assessment.
- 4.16 The EIASR acknowledges (paragraph 10.5.5) that there could be permanent significant adverse landscape effects even after the maturing of proposed mitigation measures.

- 4.17 Paragraph 10.6.1 refers to a 'landscape masterplan' for the proposed development which is said to have been informed by 'initial landscape and visual assessments'. Neither the initial assessments nor the landscape masterplan appear to be available for public comment, so their adequacy cannot be determined.
- 4.18 The EIASR acknowledges (paragraph 10.6.2) that significant adverse landscape and visual effects are possible, and that if identified, additional (secondary) mitigation measures would be proposed to avoid or reduce such effects. In my view, significant adverse landscape and visual effects are not merely possible, they are inevitable, and therefore mitigation measures would definitely be required (as acknowledged at paragraph 10.5.3) and should be identified at this stage so that their adequacy can be open to community comment. Since it appears that the development allocation would not be environmentally acceptable in the absence of landscape mitigation measures, it is essential that the proposed mitigation measures are made available for public scrutiny.

Sustainability appraisal

- 4.19 As indicated at paragraphs 2.2 and 2.3 above, the sustainability appraisal [2] (SA) for SA101 (HA2) addresses only the 3,000 home allocation, notwithstanding the clearly stated intention by the scheme promoters that this should be merely the initial phase of a much larger 10,000 home development, and does not consider the environmental or wider sustainability implications of the whole of the western link road which would be essential infrastructure for either the larger or the smaller scheme. It is unclear to what extent the portion of the link road within the boundary of the proposed HA2 allocation has or has not been assessed, but since the road could only fulfil its function as a link road when properly connected at both ends, it would not be sufficient either for sustainability assessments or for wider planning purposes to exclude consideration of the environmental implications for the whole of the link road.
- 4.20 In respect of landscape, biodiversity, archaeology, cultural heritage and environmental quality the SA [2] concluded that the impacts would be unfavourable. In respect of 'development quality', the SA concluded that the impact would be favourable, on the basis that Homes England is 'looking to deliver a landscape-led development', that it is 'currently preparing a site-wide framework design code' and that it is a public body with a 'responsibility to achieve good place-making and sustainable communities'. However, just because a body has a responsibility to achieve good place-making does not guarantee that it would happen, and no evidence has been provided on design codes or landscape analysis and masterplanning so the assumptions made in the SA in respect of design quality cannot be objectively tested.
- 4.21 In its overall conclusion, the SA acknowledges that 'strategic development at this scale will have an impact on what is currently a generally rural landscape and there will be areas where the landscape is sensitive to development'. It

states that 'evidence demonstrates a multi-modal access corridor into the site', but makes no comment as to where this 'access corridor' goes beyond the site, how it links to the wider transport network, and what the environmental implications and wider sustainability implications of this would be.

5 Landscape capacity and likely scale of impact

Landscape characteristics of the site

- 5.1 The HA2 land lies within National Character Area 121 'Low Weald' [10] and exhibits many of its key characteristics, including:
- Broad low-lying, gently undulating clay vales;
 - A generally pastoral landscape;
 - Many small rivers streams and watercourses with associated watermeadows and wet woodland;
 - A mix of woodland including ancient woodland, with veteran trees seen in hedgerows.

The NCA Profile notes that the Low Weald is a predominantly pastoral and wooded landscape that is still largely rural and relatively tranquil outside the main urban centres.

- 5.2 At a local level, as described in the 2003 Horsham District Landscape Character Assessment [11], the allocation land lies within the landscape character area K1 Upper Mole Farmlands, described as a flat to very gently undulating landscape crossed by the upper tributaries of the River Mole, predominantly pasture farmland with small to medium sized irregular field pattern and thick hedgerows.
- 5.3 Key sensitivities identified include large-scale residential development and incremental changes eroding rural character.
- 5.4 Management guidelines include the conservation of the mostly rural character of the area.
- 5.5 Although the proximity of Gatwick Airport and Crawley reduce tranquillity in this area, there is still a notable absence of light pollution during the hours of darkness, so the character of the area is particularly sensitive to any increase in light pollution such as that arising from large scale urban development.

Landscape capacity

- 5.6 A landscape capacity assessment was undertaken by Horsham District Council in 2014 and updated in 2021 [2]. The proposed HA2 allocation falls within Areas 4, 5, 6 and 7 of the 2021 capacity assessment.
- 5.7 Area 4 (River Mole) was assessed to have **no/low** capacity for residential development whether medium scale or large scale, where no/low is defined as

'The area is unable or only has very limited potential to accommodate the specified type and scale of development without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation'

- 5.8 Area 5 (land west of Ifield Brook) and Area 7 (Ifield Golf Course) were assessed as having **moderate** capacity for large scale housing, moderate being defined as

‘This area has an ability to accommodate development in some parts without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation. There is a need for each proposal to be considered on its individual merits to ensure there are no unacceptable adverse effects.’

- 5.9 Area 6 (Rusper Road) was assessed to have **low/moderate** capacity for large scale housing, low/moderate being defined as:

‘The area only has potential to be able to accommodate development in limited locations without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any mitigation’

Likely scale of impact

- 5.10 The masterplan included as Fig 7 in the draft Local Plan [1] is very crude and broad brush, so the intended form of development cannot be reliably determined, but appears to show that there would be no built development within Area 4, the most sensitive area in landscape terms, but that notwithstanding the inclusion of some landscape features, Areas 5, 6 and 7 would consist predominantly of built development.
- 5.11 For Areas 5 and 7, the 2021 assessment [2] thus judged that there was capacity to accommodate development **in some parts**. The proposal to accept built development over either the whole, or almost the whole, of these areas is therefore contrary to the Council’s own guidance on capacity and would, in my view, be likely to result in significant adverse landscape and visual impacts.
- 5.12 For Area 6, the 2021 assessment judged that there was only capacity to accommodate development **in limited locations**, so the proposal to accept built development over either the whole, or almost the whole, of this area is therefore also contrary to the Council’s own guidance on capacity, and similarly would, in my view, be likely to result in significant adverse landscape and visual impacts.
- 5.13 The characteristics of Area 4 (River Mole) as set out in the 2021 study include:
- Broad valley of the River Mole;
 - Distinctive meandering course with dense riverside vegetation;
 - Generally unspoilt rural character and in overall good condition;
 - Attractive countryside with good public footpath access.

- 5.14 The construction of the western link road within the safeguarded corridor would involve a total length of approximately 6km of which approximately 40% would lie within the proposed allocation land. The proposed route across the allocation land lies almost exclusively within Area 4 (River Mole) which the 2021 landscape capacity study judged to have the lowest capacity to accept major housing or employment development. It is reasonable to assume that the capacity to accommodate major transport infrastructure without unacceptable adverse impact would also be zero or extremely low, and that the construction of even this section of the link road would be likely to result in significant adverse landscape and visual impacts.
- 5.15 Since there is no logic in building half a link road, because by definition to function as a link road it needs to be connected at both ends (as indicated by the proposed safeguarding land in the draft Plan), it is clearly the intention for the whole 6km length of the link road to be provided. The southern section outside the HA2 allocation land also passes through extensive areas of land identified as being of high landscape sensitivity and having minimal capacity to accommodate large scale development without unacceptable adverse impact, so it must be the case that the construction of the southern section would result in additional significant adverse landscape and visual impacts, compounding the harm that would result from the construction of the northern section.
- 5.16 Were the wider 10,000 scheme to be developed, this would involve additional land including in Area 8 (Land North of Kilnwood), Area 10 (Kilnwood Copse to Graylands) and Area 11 (Faygate and Surrounds) that adjoins the High Weald National Landscape boundary to the south, all of which are identified in the 2021 assessment as having **no/low** (the lowest category) capacity for large scale housing. The adverse landscape and visual impacts should, in my view, be anticipated to be more significant, to cover a far more extensive geographic area, and to include significant adverse effects on the adjoining High Weald National Landscape (AONB) and its setting.

6 Tranquillity

- 6.1 Tranquillity is one of the qualities of the landscape that is increasingly under threat, especially in the Southeast where development pressure is so intense. Tranquillity is normally taken to mean an absence of visual intrusions, such as jarring or discordant elements in the view, as well as freedom from noise and light pollution.
- 6.2 No systematic mapping of tranquillity has been undertaken across its area by Horsham District Council, but a useful source of information has been produced by CPRE and LUC, who have mapped England's light pollution and dark skies [12].
- 6.3 Figure 1 below shows the light pollution map for the area including the HA2 land west of Ifield. The highest levels of artificial illumination are clearly visible as Crawley and Gatwick airport. Levels of light pollution fall rapidly as one heads west from Ifield and the majority of the proposed allocation land lies within the pale green (Band 4: 1-2 Nanowatts/cm²/sr) or the pale blue (Band 3: 0.5-1.0 nW/cm²/sr), very similar to the levels found with the High Weald AONB to the south of the A264. The map shows that the majority of the suburban areas including areas such as Ifield and Kilnwood Vale fall into Bands 6 (orange) or Band 7 (pink).
- 6.4 The 2003 district landscape character assessment [11] describes Area K1 (Upper Mole Farmlands) as being 'mostly rural in character' but states that it 'lacks tranquillity'. I disagree, and consider this an unhelpful oversimplification, no doubt reflecting the resources available at the time for the study, and the fact that the fieldwork would have been undertaken during daylight hours. The 2003 study makes assumptions about the proximity of Gatwick airport but does not comment separately on light pollution and noise pollution, key components of tranquillity which may not be the same.
- 6.5 Personal observation confirms the striking contrast between the suburban areas of Ifield and the proposed allocation land, where the experience of the latter is that the skies are notably dark notwithstanding the relative proximity of Crawley and Gatwick airport, and that the area is perceived to be both rural and peaceful.
- 6.6 Although the tranquillity of the allocation land is reduced to some extent by noise disturbance due to the proximity of Gatwick airport, it is not on the main flight paths which run east-west and it is not generally subject to any significant noise disturbance from road traffic, in contrast to the parts of the High Weald National Landscape (AONB) immediately south of the A264 which are subject to traffic noise.
- 6.7 In parts of the designated National Landscape, for example around Pease Pottage and in the vicinity of Kilnwood Vale, in addition to being subject to noise from road traffic, the levels of light pollution rise to the orange (Band 6:

4-8 nW/cm²/sr) and pink (Band 7: 8-16 nW/cm²/sr) levels. This is notably higher than the levels found on the HA2 land and the 10,000 scheme land.

- 6.8 New infrastructure, in particular the proposed Western Link Road, would introduce additional activity, noise and lighting. The number of homes proposed would give rise to increased lighting levels at night, and in the case of the 10,000 scheme land would have an adverse effect on the National Landscape and its setting.
- 6.9 The importance of light pollution, a key aspect of tranquillity, is increasingly recognised as a national policy issue. The NPPF now includes explicit reference to the need to minimise light pollution (paragraph 185 (c)).
- 6.10 The extent and significance of adverse effects of light pollution on wildlife is a matter of increasing concern to ecologists. Previously, attention was primarily focused on bats and moths, but it is now understood that a wide range of aquatic and terrestrial ecosystems are affected by artificial illumination at night – see for example the 2018 article in Nature: ‘The dark side of light: how artificial lighting is harming the natural world’ [13].
- 6.11 Neither the overall impact on tranquillity nor the more specific impact on light pollution have been adequately assessed by the Council in the draft Local Plan [1] or the accompanying Sustainability Appraisal [2]. Any large-scale new residential development will have an impact on tranquillity, and this impact has not been quantified. Neither the landscape nor the ecological significance have been addressed in any meaningful way by the Council in its site allocation processes. Neither proposed Policy HA2 nor its supporting text make any mention of the harm that would be caused by loss of tranquillity and increase in light pollution.
- 6.12 I conclude that
- Both the HA2 land and the 10,000 scheme land currently enjoy a high degree of tranquillity, comparable to levels within many parts of the High Weald National Landscape (AONB), and indeed are more tranquil than some parts of the National Landscape immediately south of the A264;
 - Although it is subject to some aircraft noise from the nearby Gatwick airport, the HA2 land benefits from dark skies and very low levels of light pollution, notwithstanding the proximity of Crawley and the airport;
 - Residential development would inevitably bring increased levels of noise, traffic, artificial lighting and human activity that would have a radical and adverse effect on the peace and tranquillity of this rural land.

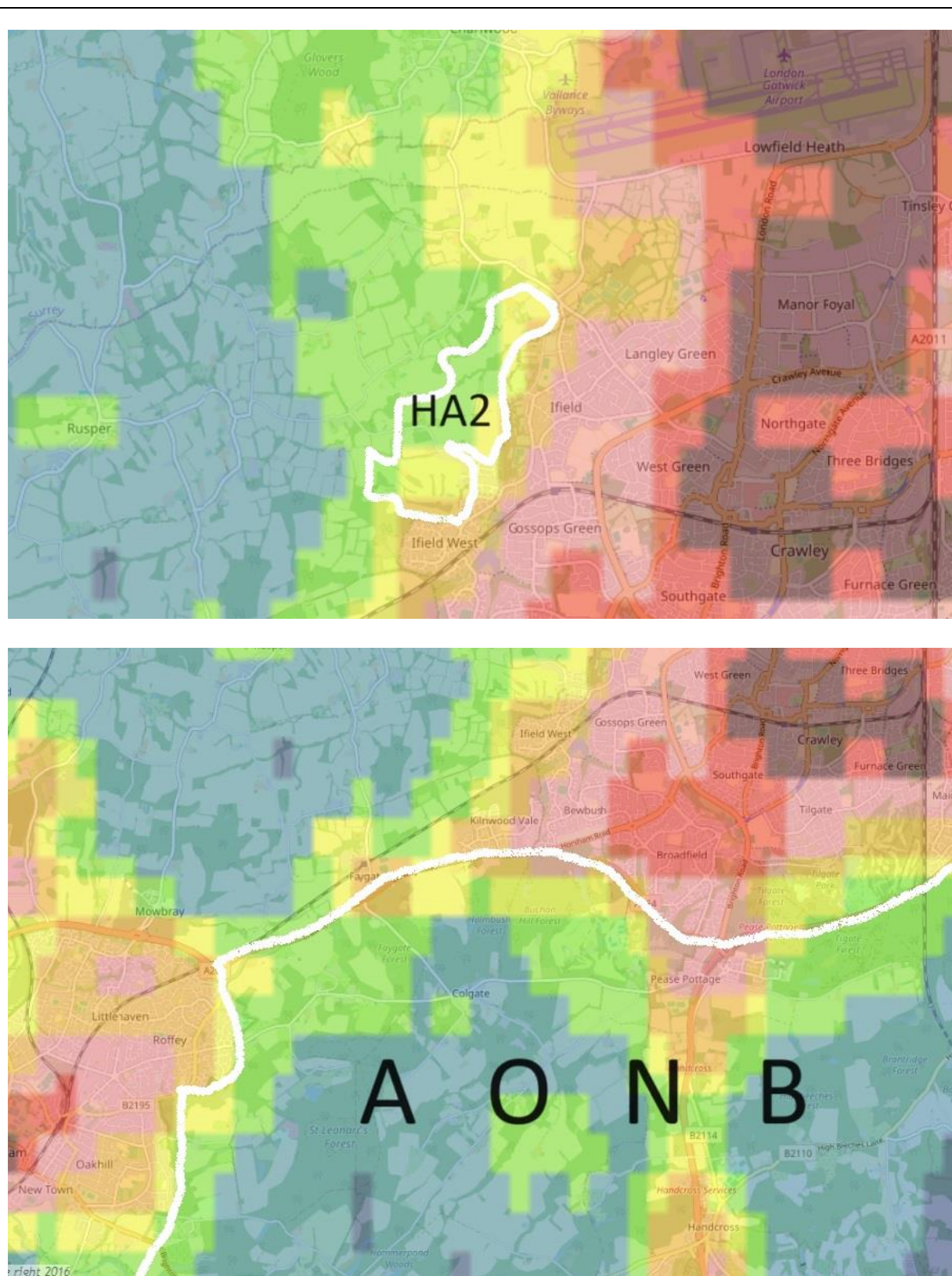


Figure 1: Relative extent of light pollution across HA2 land and AONB (National Landscape) from CPRE/LUC night blight. All boundaries approximate.

[Map copyright Natural England 2016]

7 Effect on landscape-related policy

Compatibility with national planning policy

- 7.1 The development of extensive areas of countryside at the scale proposed, whether the 3,000 scheme land (the HA2 allocation) or the 10,000 scheme land, is not compatible with NPPF para 174 (b) which requires planning policies and decisions to contribute to and enhance the natural and local environment and to recognise the intrinsic character and beauty of the countryside.
- 7.2 However, this alone would not be sufficient to reject the proposed allocation, since the same argument could apply to any large-scale housing development on any area of undeveloped countryside.
- 7.3 In this case however, the conflict with national policy is more significant. Firstly, the High Weald National Landscape (AONB) is a ‘valued landscape’ within the meaning of the NPPF, and development of the 10,000 scheme would have an adverse effect on its setting, contrary to paragraph 176. Housing development at the scale proposed in close proximity to the boundary of the National Landscape would have an adverse effect on its setting in three ways:
- Visual impact – there would be adverse effect on views;
 - Landscape impact – there would be an adverse impact on character;
 - Light pollution and loss of tranquillity – increased levels of artificial illumination, traffic, noise and human activity.
- 7.4 NPPF paragraph 185 includes a requirement to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscape and nature conservation.
- 7.5 National planning policy guidance on light pollution [14] confirms that ‘light pollution’ or ‘obtrusive light’ ‘...can be a source of annoyance to people, harmful to wildlife and undermine enjoyment of the countryside or the night sky, especially in areas with intrinsically dark landscapes.’ The guidance defines intrinsically dark landscapes as those entirely or largely, uninterrupted by artificial light.
- 7.6 The night skies of the HA2 land and the 10,000 scheme land are predominantly similar in their levels of darkness to many parts of the High Weald National Landscape (AONB) and can accurately be described as being ‘largely uninterrupted by artificial light’. The protection of these areas of land from light pollution is therefore a matter that the NPPF requires to be addressed in planning decision-making.

Compatibility with adopted local plan policies

- 7.7 The adopted Horsham District Planning Framework (2015) [5] states (paragraph 3.10) that the rich heritage and high quality natural environment of the district is recognised and promoted and that in recognition of the key role that the environment and character of the district play in the local and wider economy that it is critical that the character of the district is conserved and enhanced (paragraph 3.26). The development of either the 3,000 scheme or the 10,000 scheme for housing would undermine these objectives.
- 7.8 The overall purpose of Policy 2 (Strategic Development) is ‘to maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth...’
- 7.9 Goal 1 is to focus development in and around the key settlement of Horsham, Goal 6 is to prevent the merging of settlements and to protect rural character and landscape; Goal 12 is to retain and enhance natural environmental resources including landscape and landscape character. The development of either the 3,000 scheme or the 10,000 scheme for housing would be directly contrary to the stated purpose of Policy 2 and to its Goals 1, 6 and 12.
- 7.10 Development of the 3,000 scheme or the 10,000 scheme land would be detrimental to landscape character, would fail to protect and conserve the key features and characteristics of the landscape, and in respect of the 10,000 scheme land would erode settlement separation, and would therefore be contrary to Policies 25 and 26.
- 7.11 Policy 27 specifically aims to prevent settlement coalescence, and sets out 4 tests that would need to be satisfied if development between settlements were to be deemed acceptable. If the 10,000 scheme land were to be developed for housing, none of the 4 tests would be satisfied, so the development would be unambiguously and directly contrary to adopted local plan policy.
- 7.12 Development of the 10,000 scheme land would be harmful to the setting of the High Weald AONB and would therefore be contrary to Policy 30 which requires the conservation and enhancement of statutorily protected landscapes and their setting.
- 7.13 Development of the 3,000 scheme land would be harmful to the setting of the Ifield Conservation Area and would therefore be contrary to Policy 34 which requires the retention and improvement of the setting of heritage assets.

Compatibility with proposed new local plan policies

- 7.14 Strategic Policy 3 (Settlement Expansion) of the Reg 19 draft Plan requires development to be ‘contained within an existing defensible boundary and the landscape and townscape features are maintained and enhanced.’ The proposed allocation would manifestly fail to do so.

7.15 Strategic Policy 11 (Environmental Protection) of the draft Plan requires development to minimise light pollution, and specifically to minimise the impact of lighting on neighbouring uses and on the wider landscape. Development of 3,000 new homes in a generally unspoilt rural landscape would inevitably result in additional light pollution and conflict with this policy. Development of the 10,000 scheme would do so to an even greater extent.

7.16 Strategic Policy 13 (Natural Environment and Landscape Character) of the draft Plan protects the natural environment and landscape character from inappropriate development and requires development to:

(2) Protect conserve and enhance landscape and townscape character... and ...maintains settlement separation.

Development of the proposed allocation land (the 3,000 scheme) would have an adverse impact on landscape character and would therefore conflict with this policy. Development of the 10,000 scheme would in addition fail to maintain settlement separation and would fail to meet the requirement of this policy to 'conserve and where possible enhance the setting' of the High Weald National Landscape (AONB).

7.17 Strategic Policy 14 (Countryside Protection) seeks to protect the rural character and undeveloped nature of the countryside from inappropriate development. It requires development to be appropriately integrated within the landscape and to be of a scale appropriate to its countryside character and location, and to avoid causing a significant increase in the overall level of activity in the countryside and to protect and/or conserve and/or enhance the key features and characteristics of the landscape character area in which it is located. Development of 3,000 homes on the proposed allocation land would directly conflict with this policy.

7.18 Strategic Policy 15 (Settlement Coalescence) protects landscapes from development which would result in the coalescence of settlements in order to protect local identity and a sense of place. It specifies the requirements to be met as:

- a) There is no significant reduction in openness and 'break' between settlements;
- b) It does not generate urbanising effects within the retained 'break' between settlements, including artificial lighting, development along and/or the widening of the roads between settlements; and increased traffic movements;
- c) Proposals respect the landscape and contribute to the enhancement of their countryside setting including, where appropriate, enhancements to the Green Infrastructure network, the Nature Recovery Network and/or provide opportunities for quiet informal countryside recreation.

7.19 Although residential development on the proposed HA2 allocation land would not directly result in coalescence of settlements to a significant degree, it is highly likely that it would do so indirectly, in that the development of the 10,000

scheme would fail on each of these tests, would fail to protect local identity and would seriously erode sense of place, so would be in direct conflict with this policy.

- 7.20 Given the obvious and strong linkage between the 3,000 scheme and the wider 10,000 scheme, any decision on the proposed HA2 allocation would necessarily need to take into account the likelihood and consequences of further subsequent expansion of residential development.
- 7.21 Strategic Policy 16 (Protected Landscapes) requires the natural beauty of the High Weald AONB (National Landscape) to be conserved and enhanced, and that there will be no adverse impacts on the natural beauty of the protected landscape. It requires proposals to have regard to the relevant landscape management plan (in this instance the High Weald AONB Management Plan 2019-2024, 4th Edition [6]), to demonstrate how the key landscape features or components of natural beauty and the setting of the protected landscape will be conserved and enhanced, and to have appropriate regard to 'dark skies', maintaining local distinctiveness, sense of place and the setting of the protected landscape and if necessary providing mitigation or compensation measures. Whilst the development of the 3,000 scheme would be unlikely to have any significant effect on the National Landscape, the development of the 10,000 scheme would undoubtedly have serious adverse effects on the National Landscape and its setting and compromise dark skies, local distinctiveness and sense of place.

Compatibility with the Neighbourhood Plan

- 7.22 The Rusper Neighbourhood Plan 2018-2031 [7] which was made on 24 June 2021 forms part of the statutory development plan for the parish of Rusper.
- 7.23 In relation to housing development, the Neighbourhood Plan follows the 2018 HDC SHELLA map [8] and takes the position that there are no additional sites suitable for large scale housing in the parish beyond those areas for which planning permission has already been given. Development of the 3,000 scheme (the HA2 allocation) or the 10,000 scheme for large-scale housing would be directly contrary to the Neighbourhood Plan.
- 7.24 Neighbourhood Plan Policy RUS10 (Dark Skies) requires all new development to be designed to minimise light pollution and stipulates that all new proposals must demonstrate how light pollution will be prevented. Residential development at the scale proposed, whether for 3,000 or 10,000 homes, would inevitably result in a significant increase in artificial lighting and in light pollution, and would be incompatible with this policy.

Compatibility with the High Weald AONB Management Plan

- 7.25 The local planning authority has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of National Landscapes (AONBs) in making decisions that affect the designated area. In accordance with NPPF para 176 this includes the setting of AONBs as well as development within their boundaries.
- 7.26 Among the key characteristics of the High Weald National Landscape identified in its Management Plan [6] under the heading 'Other perceived qualities' (page 59) are:
- *Scenic beauty and glimpsed long views*
 - *Unspoilt rural landscape with a sense of naturalness unusual in South East England*
 - *Intrinsically dark skies landscapes with a sense of remoteness and tranquillity*
 - *Human-scale landscape with a sense of intimacy.*
- 7.27 Development of large-scale housing on the 10,000 scheme land extends well within the setting of the National Landscape and would be damaging to each of these four key characteristics. This would cause serious harm to the setting of the National Landscape in this area and would be incompatible with Objective OQ4 of the Management Plan that seeks to protect and promote the perceptual qualities that people value. The scenic qualities of the 10,000 scheme land which forms part of the setting of this protected landscape are clearly recognised by the Council: its recommended Horsham-Rusper circular cycling route, published on the Council website [15], refers in glowing terms to the 'beautiful countryside' and 'superb views across the Low Weald'.

8 Conclusions

- 8.1 The proposed HA2 allocation for 3,000 homes cannot be considered in isolation from the stated aspiration of the site promoter to deliver 10,000 homes. To seek to do so as the Reg 19 draft Local Plan does is illogical and incompatible with the principles of good planning.
- 8.2 The development of 3,000 homes as proposed in the draft Local Plan on a rural site of acknowledged landscape sensitivity would inevitably result in adverse landscape and visual effects, which in my view would include many that would be significant in EIA terms. Insufficient evidence has been provided to demonstrate that these adverse effects could be reduced to an acceptable level through embedded or secondary mitigation measures.
- 8.3 There is a serious deficit in the level of environmental information available and a lack of clarity over the proposed development including a seriously inadequate masterplan. The extent of these deficiencies is particularly apparent in the context of the stated aspirations to deliver a 'garden town' and a 'landscape-led' development.
- 8.4 The EIA scoping report gives rise to serious cause for concern over the approach that Homes England proposes to adopt in relation to landscape and visual impact assessment.
- 8.5 There are significant deficiencies in the Council's sustainability appraisal in relation to the proposed allocation, most notably the attempt to divorce the proposed allocation for 3,000 homes from the linked aspiration by the same promoter for 10,000 homes.
- 8.6 It is inevitable that the proposed development would result in a loss of tranquillity. In my view the increase in light pollution from residential development of 3,000 homes in this location would be likely to be considerable, and that of the development of 10,000 homes would be correspondingly greater.
- 8.7 Were development of 10,000 homes to occur, this would result in a coalescence of settlements contrary to current and proposed local plan policy. The likelihood of initial development of 3,000 homes leading to ultimate development of 10,000 homes is substantial.
- 8.8 The proposed HA2 allocation would conflict with national and local planning policy and guidance for the reasons set out in my report.
- 8.9 The need for mitigation to address adverse landscape and visual impacts is acknowledged in the EIA scoping report but inadequate information has been provided to establish the nature of the proposed mitigation measures and how effective they might be.

- 8.10 There is no evidence that landscape and visual impacts have been adequately considered in the current development proposal or that the key ‘garden settlement’ principle of enhancing the natural environment would be met.
- 8.11 The draft Local Plan fails the test of soundness in respect of proposed allocation HA2 West of Ifield because:
- (3) Appropriate and proportionate evidence on the landscape implications of the proposed development has not been provided; and
 - (4) 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, it does not comply with the requirements of paragraphs 174 and 176 of the NPPF.

Neil Williamson BA (Hons), MA, FLI, PPLI, FCMI
Director
Neil Williamson Associates

February 2024

Annex 1

References

[1]	Horsham District Reg 19 draft Local Plan, 2023 Local Plan Regulation 19 Horsham District Council
[2]	Horsham District planning policy evidence base (local plan review) including Sustainability Appraisal and Landscape Capacity studies https://www.horsham.gov.uk/planning/planning-policy/evidence-base
[3]	Locally-led Garden Villages, Towns and Cities, DCLG, 2016 https://www.gov.uk/government/publications/locally-led-garden-villages-towns-and-cities
[4]	Homes England EIA Scoping Report and covering letter ref EIA/23/0007 https://iawpa.horsham.gov.uk/PublicAccess_LIVE/SearchResult/RunThirdPartySearch?FileSystemId=DH&FOLDER1_REF=EIA/23/0007
[5]	Horsham District Planning Framework (adopted Local Plan), 2015 https://www.horsham.gov.uk/planning/local-plan/read-the-current-local-plan
[6]	High Weald AONB Management Plan 4 th Edition 2019-2024 https://highweald.org/aonb-management-plan/
[7]	Rusper Neighbourhood Plan, 2021 https://rusper-pc.org.uk/neighbourhood-plan/ https://www.horsham.gov.uk/planning/neighbourhood-planning/rusper
[8]	Rusper Housing Assessment and map, SHELAA 2018 https://www.horsham.gov.uk/planning/planning-policy/strategic-housing-and-economic-land-availability-assessment-shelaa/housing-land-availability
[9]	Guidelines for Landscape and Visual Impact Assessment, 3 rd Edition, 2013, Landscape Institute & IEMA (GLVIA3)
[10]	National Character Area Profile: 121 Low Weald, Natural England, 2013 https://publications.naturalengland.org.uk/publication/12332031?category=587130
[11]	Horsham District Landscape Character Assessment (and LCA map), 2003 https://www.horsham.gov.uk/planning/planning-policy/evidence-base/landscape-character-assessment
[12]	England's Light Pollution and Dark Skies map, CPRE (Natural England, 2016) https://www.nightblight.cpre.org.uk/maps/
[13]	The dark side of light: how artificial lighting is harming the natural world, NATURE, Jan 2018 https://www.nature.com/articles/d41586-018-00665-7
[14]	National Planning Policy Guidance: light pollution https://www.gov.uk/guidance/light-pollution

[15]	Horsham-Charlwood-Rusper-Warnham leisure cycling route (Route 26) https://www.horsham.gov.uk/sport-and-leisure/cycling
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Annex 2

Summary of qualifications and experience

Neil Williamson is a Chartered Landscape Architect, an Urban Designer, and a Fellow and Past President of the Landscape Institute, with more than 35 years' experience in landscape planning including appeals and Public Inquiry work. He is an independent consultant offering environment, design and management services, a Design Council Expert – Associate and a member of various Design Review panels including at the Design Commission for Wales and Design West. Prior to setting up his own consultancy business he was Head of Environmental Design at New Forest District Council, responsible for environmental project delivery and professional advisory services in landscape architecture, urban design, architecture, building conservation and arboriculture. He regularly provides design and landscape advice to Bath & North East Somerset Council on the implications of development proposals within the City of Bath double World Heritage Site and its setting, and within or affecting the setting the Cotswolds and Mendips National Landscapes (AONBs).

Experience in landscape planning and development management includes:

- Critical appraisal of planning submissions and EIAs
- Formal and informal Design Review
- Assessment of proposals in the light of national policy and local policy for design and the environment
- Analysis of Landscape and Visual Impact
- Environment and design negotiation
- Advice and recommendations to support planning decisions
- Expert witness and contributing to the local planning authority response to major infrastructure proposals (e.g., Navitus Bay proposed offshore wind farm; Dibden Bay proposed container port)
- Provision of environmental design policy advice for successive versions of the Local Plan in New Forest District over the period 1991–2015
- Project leader for New Forest District Landscape Character Assessment, adopted as Supplementary Planning Guidance in 2000

Experience in Public Inquiry/ Public Examination includes:

- Navitus Bay (proposed Offshore Wind Farm) Public Examination, 2014 (decision 2015)
 - Analysis of landscape and visual impacts, responses to Environmental Statements, Local Impact Report, negotiation of financial and environmental offsetting measures, co-ordination with other Hampshire, Dorset and Isle of Wight planning authorities
- Dibden Bay (proposed Container Port) Public Inquiry, 2001–2002 (decision 2004)
 - Expert Witness on behalf of New Forest District Council and Hampshire County Council for landscape, visual and community impacts
 - Appointment, supervision and co-ordination of specialist consultants (e.g. lighting, visualisation techniques)
 - Support to and liaison with local community groups and other organisations with similar environmental concerns, including National Trust, New Forest Committee, Council for National Parks and CPRE
- Local Plan Inquiries and Examinations, 1993–2012
 - Expert Witness and supporting evidence
- s78 Appeals by Public Inquiry, various, 1991–2017, Expert witness

For further details of background and experience please see website:

<https://www.neilwilliamsonassociates.com/>

Rusper Neighbourhood Plan

Landscape Character Assessment

and

Assessment Of Local Gaps In Plan Area

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1. Introduction

The Rusper Neighbourhood Plan Group has set out to identify distinct areas within the overall plan

area and provide a broad assessment of the character of each area and its importance to the landscape and the communities that live there. This document also identifies three specific Local Gap areas between settlements in the parish, which either serve as a rural buffer or a visual break helping to maintain the individual nature of a settlement, or which make a key contribution to the character of a settlement, or its rural setting. These will be designated as Local Gaps in the Rusper Neighbourhood Plan and given additional protection in recognition of the significant role they play.

The Rusper Neighbourhood Plan Group has prepared this assessment to create a consistent and transparent methodology for evaluating potential Local Gaps. It forms part of the Evidence Base which has informed the production of the Neighbourhood Plan.

This assessment establishes three tests which potential sites must pass in order to qualify as important landscape areas and a fourth test to qualify as Local Gaps. It also demonstrates how each of the sites identified in the Rusper Neighbourhood Plan Pre-Submission Plan (August 2019) satisfies these tests.

While preparing the document, we have been especially aware of the need to follow natural boundaries and incorporate important wildlife and flood plain areas. This means that some areas extend outside of the plan area. It is recognised that no special protection can be provided outside this plan area by this plan, but it was felt that to end the recognition of the significance of these areas at an arbitrary parish boundary did not seem consistent with recognising the reason for their designation.

2. Policy Background

National Planning Policy

The National Planning Policy Framework 2019 (NPPF) §20 item (b) highlights the need to consider flood risk implications and item (d) is clear about the need for “conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation”.

NPPF §15 makes it clear that planning should be genuinely plan-led ... for local people to shape their surroundings.

NPPF §29 states that “Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan”.

NPPF §170 states that the “planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes”.

Local Planning Policy

Note 16 on page 10 of the NPPF states that: “Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area”. Therefore, any policy in the Neighbourhood Plan, including the policy relating to Local Gaps, must be in general conformity with the strategic policies of the local plan.

The important local plan for our purposes is the Horsham District Planning Framework (HDPF).

Key policies in the HDPF are:

HDPF Policy 27 Strategic Policy: Settlement Coalescence, which is clear that “Landscapes will be protected from development which would result in the coalescence of settlements.”

HDPF Policy 26 Strategic Policy: Countryside Protection, which is clear that “Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected

against inappropriate development.”

HDPF Policy 25 Strategic Policy: The Natural Environment and Landscape Character, which states “The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development.”

HDPF Policy 24 Strategic Policy: Environmental Protection, which states “The high quality of the district’s environment will be protected through the planning process and the provision of local guidance documents.”

HDPF Policy 30 Protected Landscapes also applies as the plan areas lies close to the High Weald AONB and point 1 states “The natural beauty and public enjoyment of the High Weald AONB and the adjoining South Downs National Park will be conserved and enhanced and opportunities for the understanding and enjoyment of their special qualities will be promoted”. Many of the views from the plan area extend across the High Weald AONB and even to the South Downs National Park.

Additional considerations from the HDPF are:

HDPF Policy 38 Strategic Policy says that Development proposals will avoid the functional floodplain.

HDPF Spacial Objectives:

7. To locate new development in sustainable locations that respect environmental capacity and which have appropriate infrastructure, services and facilities in place, or where these can realistically be provided; and to encourage the appropriate re-use of brownfield sites in sustainable locations
10. Identify and preserve the unique landscape character and the contribution that this makes to the setting of rural villages and towns and ensure that new development minimises the impact on the countryside.
11. To safeguard and enhance the environmental quality of the district, ensuring that development maximises opportunities for biodiversity and minimises the impact on environmental quality including air, soil, water quality and the risk of flooding.
12. Ensure that new development minimises carbon emissions, adapts to the likely changes in the future climate and promotes the supply of renewable, low carbon and decentralised energy.

HDPF Spacial Portrait:

- 3.17 It is important for the strategy to reflect and address the challenges that emerge from a mixed urban/rural environment, whilst maintaining and enhancing the natural beauty of the area. The natural environment plays a key role in the health of the district's economy. This includes the provision of ecosystem services such as flood attenuation and the offsetting of climate change, as well as land for food production. The district also provides ecosystem services for the more urbanised areas in the wider Gatwick Diamond, including Crawley. The natural environment also has direct economic benefits, and woodland management for biodiversity has for example been identified as having high potential as a low carbon fuel source by the Local Economic Partnership.
- 3.18 The diversity of the landscapes, townscapes and settlement pattern which characterises the district is an environmental and cultural asset of great value which needs to be respected and enhanced in planning and land management decisions. This is of particular importance as the rural, leafy environment and historic villages are a key reason that individuals and businesses choose to locate in the district, and protecting this

character will help ensure the health of the economy of the district into the future. The role and influence of Horsham Town as the major centre within the district is key. The need to manage change within the District also remains a priority. There is a need to plan for new infrastructure, largely funded by new development, to serve a growing population. The district also has its own rural issues, not least in terms of access to services within rural areas and the future of the rural economy in such a changing context.

Other Horsham District Council References

Horsham District Landscape Capacity Assessment (April 2014)

<https://www.horsham.gov.uk/planningpolicy/planning-policy/evidence-base/landscape-capacity-assessment-report>

Horsham District Landscape Character Assessment (Oct 2003)

https://www.horsham.gov.uk/_data/assets/pdf_file/0020/31349/Landscape-Character-Assessment-2003.pdf

Considerations from West Sussex County Council

The plan area also falls within the Low Weald Hills area LW4 and Low Weald Northern Vales area LW8 of the West Sussex County Council (WSCC) **West Sussex Landscape Land Management Guidelines**, last updated: 29 May 2019. This is part of the WSCC **Landscape character assessment of West Sussex** (see <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/>).

The WSCC **Strategy for the West Sussex Landscape** document (see

https://www.westsussex.gov.uk/media/1771/landscape_strategy.pdf) is designed to assist community led planning and states:

The results of their decisions and actions will assist delivery of the Strategy if:

- *strong landscape character-based development plan policies are adopted.*
- *the location of development in Development Plans takes account of the Strategy objectives.*
- *the Strategy informs the preparation of development briefs and concept statements for sites subject to major development proposals.*
- *the Strategy informs and supplements development control, landscape protection and design policies and criteria.*
- *the Strategy underpins the preparation of Countryside Design Summaries to help foster local distinctiveness.*

All of this applies to local gap decisions, especially the last point on local distinctiveness.

3. Criteria For Assessing Landscape Areas

Wherever feasible, physical boundaries have been used to define all areas. However, where no suitable boundary exists, other features have been used to demarcate the area, such as a line created by extending a neighbouring boundary.

Large areas of native woodland have been included in potential Local Gaps for ease of mapping, even though these are sufficiently protected under specific HDPF and Neighbourhood Plan policies.

To ensure consistency of approach across the parish, three tests have been devised for identifying important landscape character areas. To qualify for designation, each area should satisfy Test 1, as well as satisfying either Test 2 or Test 3. An additional Test 4 has been used to identify specific areas that would qualify as a Local Gap in planning terms, this test, relates to proximity to an area that is in danger of losing its distinct character if development occurred in these gaps. A further Test

5 is used to identify areas that need special consideration in relation to the Spatial Plan policy in the Rusper Neighbourhood Plan.

Test 1. Does any land in the proposed Local Gap already have planning permission, or has it been allocated for development in the HDPF?

- The first stage in the assessment will be to review the planning history of each area to ensure that it is not subject to an extant planning permission, and that it has not been allocated for development under a local plan.
- The Local Gaps designation will rarely be appropriate where land already has planning permission, or where it has been allocated for development under the local plan.
- An exception to this may be where it can be demonstrated that the Local Gap designation would be compatible with the planning permission / local plan allocation, or where the planning permission / local plan allocation is no longer capable of being implemented.

Test 2. Does the area play an important role as a buffer preventing coalescence between settlements, and if so, could this role be significantly harmed by development?

- An area could qualify for designation as a Local Gap if it played an important role as a buffer preventing coalescence between settlements, and if this role could be significantly harmed by development.
- Coalescence is the growing together of settlements. This frequently takes the form of ribbon development along main roads between neighbouring settlements. The merging of settlements is often accompanied by a loss of individual identity: instead of being experienced as a community in its own right, a settlement may be regarded as a neighbourhood or suburb of a larger combined entity.
- In evaluating the importance of an area's role as a buffer, consideration should be given as to how much open space currently exists between settlements. Where little open space remains between settlements, its designation should be prioritised.
- Consideration should also be given to the quality of the remaining open space. A significant stretch of undeveloped land will be more effective at preventing coalescence than land punctuated by built forms.
- In determining if development would significantly harm an area's ability to act as a buffer, account should be taken of how even low levels of development can bring about changes in the way an area is experienced. For example, a few dwellings, modern agricultural barns, holiday caravans or equine structures can in some situations fragment the sense of uninterrupted open countryside, and create the experience of a suburban rather than a rural landscape.
- Account should also be taken of the fact that large settlements tend to exert greater effects on their hinterlands than small ones. The impacts of noise, litter, light pollution, traffic and incidental development tend to extend further from large settlements than from small ones. Larger settlements may therefore require larger buffers than smaller ones in order to prevent a sense of coalescence.

Test 3. Does the area make an important contribution to the character or rural setting of a settlement, and if so, could this be significantly harmed by development?

- An area could qualify for designation if it made an important contribution to the character or rural setting of a settlement, and if that contribution could be significantly harmed by development.
- Contributions to character or rural setting might include helping to create an attractive rural backdrop for a key approach to the settlement, or providing important views into or out of the

settlement or its environs.

- Harms might include the interruption of views, or a reduction in the sense of rural isolation.
- In determining harms to the character or rural setting of a settlement, account should be taken of how even low levels of development can bring about changes in the way an area is experienced in certain contexts. For example, a single dwelling, modern agricultural barn or equine complex on open land can fragment a sense of rural isolation deriving from uninterrupted countryside.
- Account should also be taken of the effects of incidental development such as gardens, lighting, vehicle splays and signage. For example, the planting of alien coniferous trees or shrubs around new dwellings can have a powerfully suburbanising effect in a rural location.

Test 4. Will the character of a nearby settlement be significantly altered by development and cause it to merge with another settlement?

This test mostly applies to small distinct communities (not necessarily formally recognised as “settlements”) close to larger established developments. These areas fall within the terms of **Policy RUS8: Landscape Character and Local Gaps** of the Rusper Neighbourhood Plan Pre-Submission Plan (August 2019).

Whilst the whole of the plan area is rural and under threat, there are specific areas, with their own special character, that risk being enveloped into their neighbouring settlements. This test relies on the area being identifiable as separate to the larger area that might otherwise absorb them.

Test 5. Is the area significant in terms of its location or character?

This test applies to areas or communities (not necessarily formally recognised as “settlements”) close to larger established developments, that have special significance, either in terms of their character, environment or views. These areas fall within the terms of **Policy RUS1: Spatial Plan** of the Rusper Neighbourhood Plan Pre-Submission Plan (August 2019).

Whilst the whole of the plan area is rural and under threat, there are specific areas, with their own special character, that risk being enveloped into Crawley and Horsham. This test relies on the area being identifiable as being separate to the larger area that might otherwise absorb them.

4. Consultation

This assessment is published on Rusper Parish Council’s website as part of the Neighbourhood Plan Evidence Base, where it can be viewed and commented on by all those taking part in consultations on the Neighbourhood Plan.

The views of parish residents and external organisations are sought through the consultations on the Pre-Submission Plan (August 2019).

In the light of responses received from consultees, the Rusper Neighbourhood Plan Group will revise the criteria for assessing Local Gaps, and review each proposed area according to the updated criteria.

5. Areas Identified as Landscape Character

TABLE A: Assessment of Landscape Character Areas identified in the Rusper Neighbourhood Plan Pre-Submission Plan (August 2019) below provides information about each of the six areas (LC1 to LC6) identified as distinct landscape character areas in the Rusper plan area. These have each been assessed against the three tests set out above. They are clearly marked on the Landscape Character Areas Map also below.

6. Areas Identified as Local Gaps

TABLE B: Assessment of Local Gaps identified in the Rusper Neighbourhood Plan Pre-Submission Plan (August 2019) below provides information about each of the area (LG1) identified as a distinct Local Gap in the Rusper plan area. This has each been assessed against the three tests set out above and fall within one of the six landscape character areas. It also passes the additional test 4 set out above for Local Gaps. The area is clearly marked on Local Gap Map 1 also below.

7. Areas Identified as Spatial Plan Areas

TABLE C: Assessment of Spatial Plan areas identified in the Rusper Neighbourhood Plan Pre-Submission Plan (August 2019) below provides information about each of the two areas (SP1 and SP2) identified as significant areas as part of the Rusper plan Spatial Plan policy. These have each been assessed against the three tests set out above and fall within one of the six landscape character areas. They are additionally important in providing clear distinction between the rural fringe of the parish and the neighbouring more urban developments. Each is clearly marked on Spatial Plan Map 1 and Spatial Plan Map 2 also below.

8. Special Views Within the Plan Area

Additionally, there are important views out from Rusper Village that need to be recognised. The village is the highest in West Sussex and as such has extensive views in all directions. There are three main views identified here as being of a special nature that require protecting:

1. The westerly view from the sports field in the High Street. This view extends to the South Downs in the south and Leith Hill in the north and is the most extensive view from the village. Along with the setting of the beacon, erected to commemorate the end of the First World War, this location is an important part of the character of the village as a whole.
2. The easterly view from behind the playground in the High Street extends across to Ashdown Forest in the distance and the southerly part of this view takes in the High Weald AONB along the Colgate ridge.
3. The views from the footpath between the Star Inn, Rusper and Lambs Green highlight the rural nature of this area. The extensive views looking down from the village take in the High Weald AONB, while the views on the walk up to the village provide a rural landscape setting for the village itself.

The views re highlighted on Spatial Plan Map 3 as SPV1 to SPV3 respectively.

8. Maps and Assessment Details

Below are the tables and maps showing the details of the landscape character areas and the local gaps.

TABLE A: Assessment of Landscape Character Areas identified in the Rusper Neighbourhood Plan Pre-Submission Plan (August 2019)

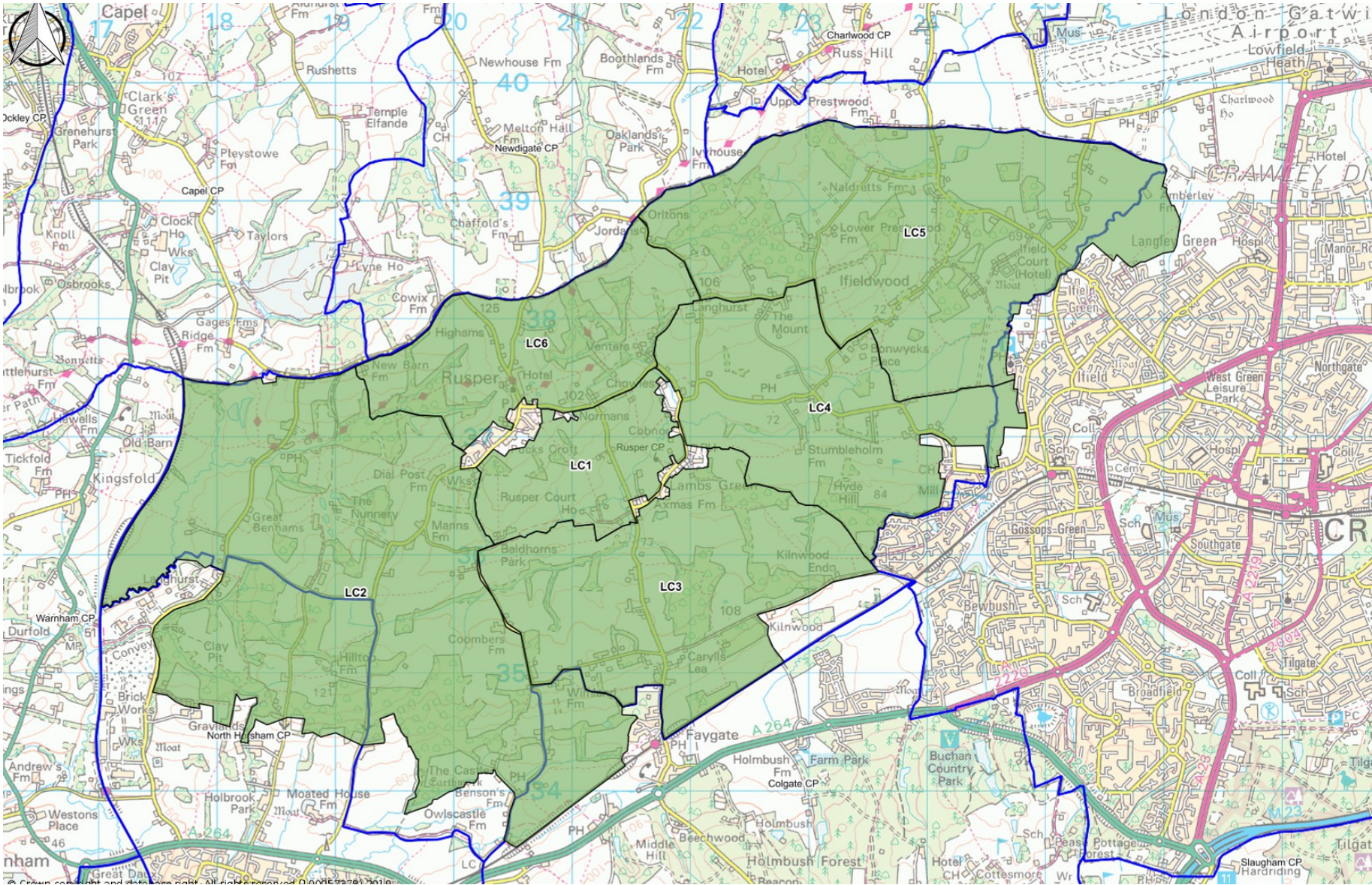
Ref.	Location of area	Description of area	Overall area (km ²)	Test 1. Is there any planning permission, or has it been allocated for development in the HDPF?	Test 2. Does the area play an important role as a buffer preventing coalescence between settlements, and if so, could this role be significantly harmed by development?	Test 3. Does the area make an important contribution to the character or rural setting of a settlement, and if so, could this be significantly harmed by development?
LC1	Between Rusper Village and Lambs Green	<p>The area extends from Lambs Green Road and the bridleway that runs to the west northward to the Rusper Village built-up boundary. It incorporates some fields just to the south of the bridleway to follow the natural contours.</p> <p>It is bounded by the River Mole to the west, Lambs Green Road to the east and East Street to the north.</p>	1.5	No	<p>The area acts as an essential buffer between Rusper Village and Lambs Green hamlet.</p> <p>Even a limited amount of new development in this gap would have a significant detrimental impact. The loss of any open land would lead to coalescence.</p>	<p>The sloping nature of the land up to Rusper Village from Lambs Green provides important countryside views, recognised by the planning inspector during the recent planning consideration for a refused application in this area (DC/15/2857).</p> <p>This area also provides important pasture land and wildlife habitat as part of the wildlife corridor to the south of Rusper Village.</p> <p>This area falls in the Low Weald Hills area LW4 of the WSCC landscape character assessment, which states that we should: <i>Conserve the rural quality of the area including the pattern of the agricultural landscape, the intricate patchwork of small scale fields, and linked woodland, and the intimate and unobtrusive settlement pattern throughout much of the area.</i></p>
LC2	Between North Horsham and Rusper Village	<p>The area extends from the northern edge of the proposed North Horsham development north to the Rusper Village built-up boundary.</p> <p>It is bounded by Wimlands Road to the East and the parish boundary to the west.</p> <p>The area is ancient woodland to the south and sloping farmland and woodland up to Rusper Village.</p>	9.26	No	<p>The area to the south of this gap, was previously recognised as part of the strategic gap between Horsham and Crawley. It has now been allocated for the North Horsham major development of 2,750 houses and business park. This makes this area especially important in terms of maintaining the Horsham Crawley separation and ensuring that the new North Horsham development and Rusper Village do not coalesce.</p>	<p>Again, the sloping nature of the land up to Rusper Village provides important countryside views in this area.</p> <p>The ancient woodland at the top of Hurst Hill (the section to the north of Hawkesbourne Farm) and other ancient woodland along this ridge form part of an important wildlife corridor that needs special consideration given the significant development to the south. Note that this area extends to the edge of the proposed new North Horsham development and so incorporates some areas outside of the plan area.</p> <p>The rest of this area falls in the Low Weald Hills area LW4 of the WSCC landscape character assessment, which states that we should: <i>Conserve the rural quality of the area including the pattern of the agricultural landscape, the intricate patchwork of small scale fields, and linked woodland, and the intimate and unobtrusive settlement pattern throughout much of the area.</i></p>

Ref.	Location of area	Description of area	Overall area (km ²)	Test 1. Is there any planning permission, or has it been allocated for development in the HDPF?	Test 2. Does the area play an important role as a buffer preventing coalescence between settlements, and if so, could this role be significantly harmed by development?	Test 3. Does the area make an important contribution to the character or rural setting of a settlement, and if so, could this be significantly harmed by development?
LC3	Between Lambs Green and Faygate and Kilnwood Vale	The area extends from Lambs Green Road south down to Faygate. The southern boundary is the parish boundary along the railway, but cuts up over the proposed area of development for the final phase of Kilnwood Vale. The eastern boundary follows the woodland edges and field boundaries down Hyde Hill to the edge of the Ifield West estate. The western boundary runs up Wimlands Road and turns to follow the woodland and field edge to the bridleway back to Lambs Green.	4.21	No	<p>This gap is an important southern break to Rusper parish again with important views down Hyde Hill. It becomes even more critical once the final phase of Kilnwood Vale is complete: that final phases crosses the railway boundary northward into Rusper parish.</p> <p>The gap avoids the coalescence of Faygate Village with Lambs Green.</p> <p>As North Horsham develops along the A264, with the proposed garage being built on the Faygate roundabout and with Kilnwood Vale extending west along the A264, this area of strategic gap between Horsham and Crawley becomes even more important.</p>	<p>The sloping nature of the land down Hyde Hill means that there are important views of open country and woodland in this area that need to be maintained.</p> <p>The main part of this area falls in the Low Weald Hills area LW4 of the WSCC landscape character assessment, which states that we should: <i>Conserve the rural quality of the area including the pattern of the agricultural landscape, the intricate patchwork of small scale fields, and linked woodland, and the intimate and unobtrusive settlement pattern throughout much of the area.</i></p> <p>The rest of the area falls in the Low Weald Northern Vales area LW8 of the WSCC landscape character assessment, which states that we should: <i>Conserve the mostly rural character of the area.</i></p>
LC4	Between Lambs Green and Ifield	The area extends from Lambs Green west and south down to Ifield. The western boundary follows the woodland edges and field boundaries down Hyde Hill to the edge of the Ifield West estate. It then follows the parish boundary eastward, skirting around the developments along the Rusper Road at Ifield and then following along the built up area boundary of Ifield, to Ifield Church. Although this takes it just outside of the plan area, it includes the important flood	3.54	No	The gap avoids the coalescence of Ifield West with Lambs Green and Rusper. It again is especially important with the recent developments along the Rusper Road from Ifield.	<p>This area is an important part of the flood plain along Ifield Brook. The brook and fields here form an important wildlife corridor along the eastern edge of the plan area and as Crawley expands outwards, these wildlife areas become more important.</p> <p>The area extends outside the plan area here, as it is especially important as flood plain and wildlife habitat and trying to set an arbitrary border for this along the parish boundary does not make sense. We recognise that the plan can give no extra protection to these outside areas, but is is important to note their importance.</p> <p>As you leave Crawley's built up area and pass Ifield Golf Course, you immediately notice the change to a rural area with farm fields and woodland areas along narrow country roads with rich hedgerows. This landscape is a critical part of the Rusper plan area in terms of identifying the break from the rural area of Crawley.</p>

Ref.	Location of area	Description of area	Overall area (km ²)	Test 1. Is there any planning permission, or has it been allocated for development in the HDPF?	Test 2. Does the area play an important role as a buffer preventing coalescence between settlements, and if so, could this role be significantly harmed by development?	Test 3. Does the area make an important contribution to the character or rural setting of a settlement, and if so, could this be significantly harmed by development?
		plain and fields along Ifield Brook. The eastern and northern boundary follows the footpath and field boundaries from Ifield Church to Bonwycks Place, then up Hillybarn Road and along the Mount.				The area falls in the Low Weald Northern Vales area LW8 of the WSCC landscape character assessment, which states that we should: <i>Conserve the mostly rural character of the area</i> . It recognises that “ <i>Some localities retain an enclosed rural character, for instance, west of Ifield</i> ” and encourages us to “ <i>Conserve the open character of the floodplain and promote natural floodplain management avoiding the introduction of engineered flood defences</i> ”.
LC5	Between Ifield and Charlwood	The southern and western boundary follows the footpath and field boundaries from Ifield Church to Bonwycks Place then up Hillybarn Road and along the Mount. It continues up Orletons Lane and follows the parish boundary to the north. The eastern boundary follows the built up area of Crawley along Ifield Brook and includes Willoughby Fields to the east.	6.33	No	This area avoids the coalescence of Crawley through Rusper parish along the Charlwood Road to Charlwood. As Crawley and Gatwick Airport grow, this area becomes at greater risk and the danger of these settlements coalescing and expanding up to Rusper Village is a real concern.	This area is an important part of the flood plain along Ifield Brook. The brook and fields here form an important wildlife corridor along the eastern edge of the plan area and as Crawley expands outwards, these wildlife areas become more important. The area also extends outside the plan area, but Willoughby Fields are especially important as flood plain and wildlife habitat, and trying to set an arbitrary border for this along the parish boundary does not make sense. We recognise that the plan can give no extra protection to these outside areas, but it is important to note their importance. The area mostly falls in the Low Weald Northern Vales area LW8 of the WSCC landscape character assessment, which states that we should: <i>Conserve the mostly rural character of the area</i> . It recognises that “ <i>Some localities retain an enclosed rural character, for instance, west of Ifield</i> ” and encourages us to “ <i>Conserve the open character of the floodplain and promote natural floodplain management avoiding the introduction of engineered flood defences</i> ”. Part of the area also falls in the Low Weald Hills area LW4 of the WSCC landscape character assessment, which states that we should: <i>Conserve the rural quality of the area including the pattern of the agricultural landscape, the intricate patchwork of small scale fields, and linked woodland, and the intimate and unobtrusive settlement pattern throughout much of the area</i> .
LC6	Between Rusper Village and	This is the area to the north of Rusper Village and	2.59	No	This area is a part of the defence against coalescence with Newdigate to the north and Capel	This area includes the ancient woodland of Horsegills Wood and other ancient woods to the east. They are separated by

Ref.	Location of area	Description of area	Overall area (km ²)	Test 1. Is there any planning permission, or has it been allocated for development in the HDPF?	Test 2. Does the area play an important role as a buffer preventing coalescence between settlements, and if so, could this role be significantly harmed by development?	Test 3. Does the area make an important contribution to the character or rural setting of a settlement, and if so, could this be significantly harmed by development?
	Newdigate and Capel	extends from the built up boundary of the village to the parish boundary in the north. The eastern boundary is along East Street, then up the farm track to Venters Farm, following the field boundaries and footpath out to Orltons Lane, then up Orltons Lane to Partridge Lane. The western boundary leaves the built up area of Rusper Village by Gardeners Green and follows field boundaries and tracks through Horsegills Wood and up to the Capel Road.			to the north-east. Whilst there is still a lot of open country once you pass the parish boundary, this area is considered an important part of the Rusper plan area and clearly separates it from the other settlements.	<p>open farmland with wildlife rich hedgerows. It is an important part of the wildlife corridor to the north of Rusper Village.</p> <p>Views out to the west of this area, especially from the Sports Field and along the Capel Road, are an important part of the character of the area. The views extend all the way to the South Downs and up to Leith Hill in the north.</p> <p>Views out to the east, especially from Ghyll Manor field behind the playground in the High Street are equally important, with views across to Turners Hill, Saint Hill and Ashdown Forest.</p> <p>This area falls in the Low Weald Hills area LW4 of the WSCC landscape character assessment, which states that we should: <i>Conserve the rural quality of the area including the pattern of the agricultural landscape, the intricate patchwork of small scale fields, and linked woodland, and the intimate and unobtrusive settlement pattern throughout much of the area.</i></p>

Landscape Character Areas Map



Map of Rusper Neighbourhood Plan Landscape Character Areas

TABLE B: Assessment of Local Gaps identified in the Rusper Neighbourhood Plan Pre-Submission Plan (August 2019)

Ref.	Location of area	Description of area	Overall area (Ha)	Test 1. Planning allocation?	Test 2. and 3. Coalescence and rural setting?	Test 4. Will the character of a nearby settlement be significantly altered by development and cause it to merge with another larger settlement?
LG1	The area extends from the north of the houses along Lambs Green Road, across the fields toward Rusper Village in the north. The eastern boundary is out to the houses along East Street and the western boundary extends across Faygate Lane to include the few fields to the north of the houses at the end of Lambs Green Road.	<p>This is an area of open farmland that slopes steeply up towards Rusper Village.</p> <p>The area is open fields with mature hedges. It is crossed by the main footpath from Lambs Green to Rusper Village through its centre.</p>	63.58	No	See Landscape Character Assessment LC1	<p>Development in this area would seriously impact the boundary of the community along Lambs Green and lead to a coalescence with Rusper Village.</p> <p>This area falls in the Low Weald Hills area LW4 of the WSCC landscape character assessment, which states that we should: <i>Conserve the rural quality of the area including the pattern of the agricultural landscape, the intricate patchwork of small scale fields, and linked woodland, and the intimate and unobtrusive settlement pattern throughout much of the area.</i></p>

Local Gap Map 1

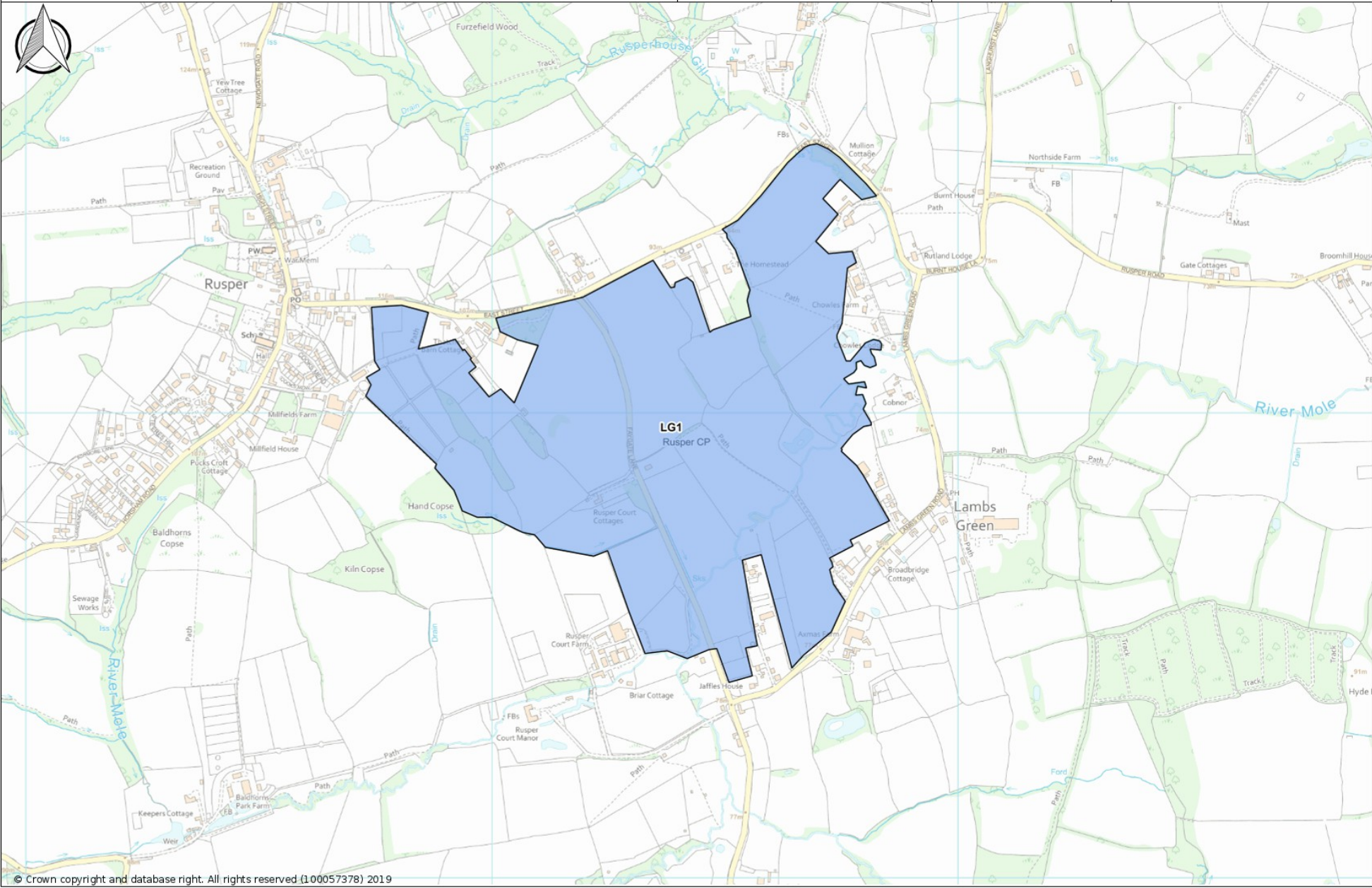
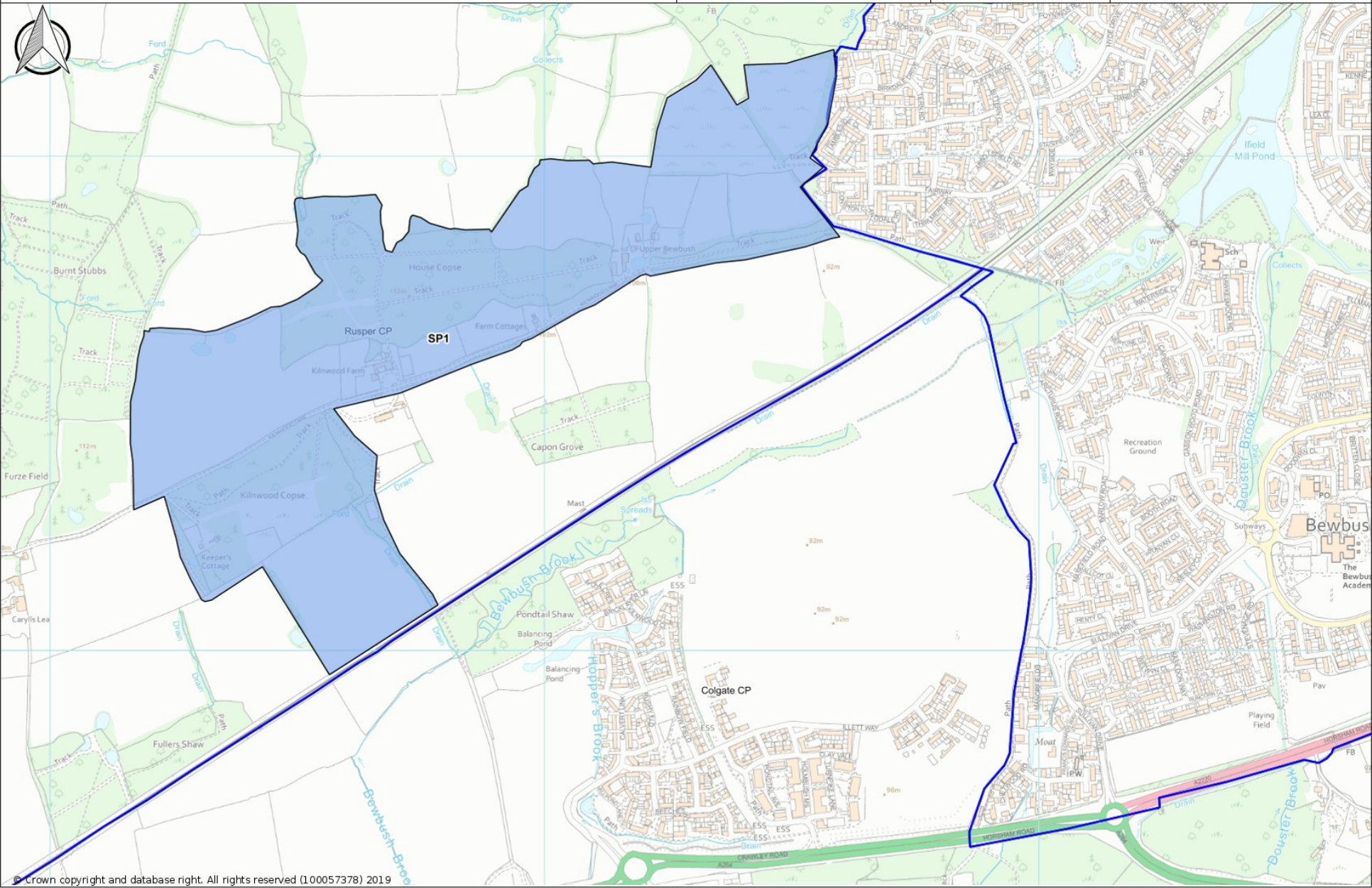


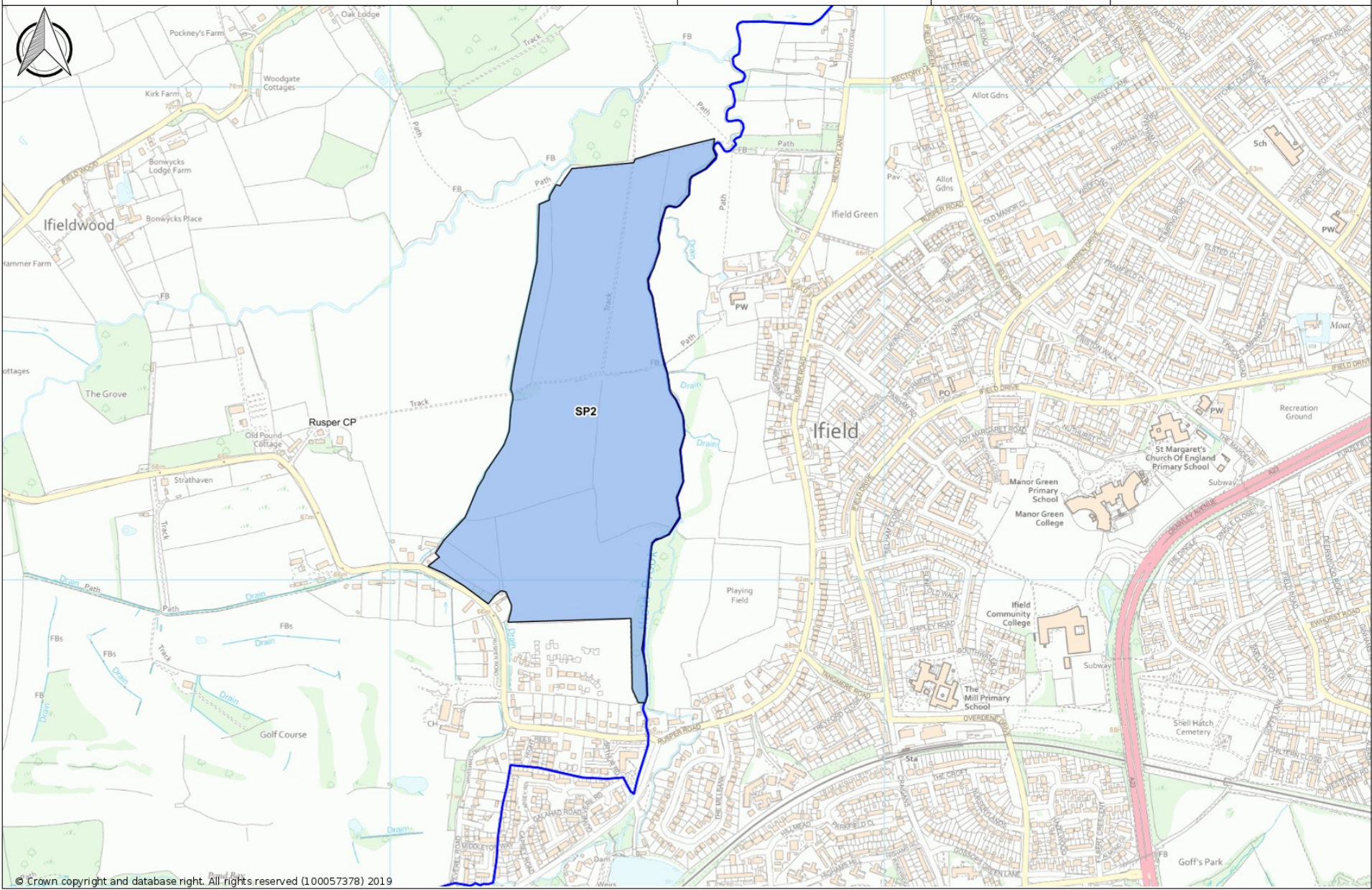
TABLE C: Assessment of Spatial Plan areas identified in the Rusper Neighbourhood Plan Pre-Submission Plan (August 2019)

Ref.	Location of area	Description of area	Overall area (Ha)	Test 1. Planning allocation?	Test 2. and 3. Coalescence and rural setting?	Test 5. Is the area significant in terms of its location or character?
SP1	<p>Land around the Kilnwood Vale development final phase.</p> <p>It runs along the railway line to the south and skirts the proposed layout of the new development and along the parish boundary.</p> <p>The northern boundary runs along the field lines to the north of Kilnwood Lane and encompasses House Copse and Kilnwood Copse.</p>	<p>This is an area of mostly pasture farm land with mature hedges that provide a varied wildlife habitat. Kilnwood Lane, a quiet country cul-de-sac, runs through the area.</p>	61.34	No	<p>See Landscape Character Assessment LC3.</p> <p>A small part of the area to the east falls into LC4.</p>	<p>Development in this area would seriously impact on the boundary of the new Kilnwood Vale development where it crosses the railway line. This would break into the separation of the new development with Ifield to the east and Lambs Green to the north.</p> <p>House Copse and Kilnwood Copse are included as they form an important part of the character of the area.</p>
SP2	<p>This area is to the north of the new Rusper Road development (The Maples, Rusper Road).</p> <p>It runs along the northern boundary of the development and follows Ifield Brook (the parish boundary) on the east, up to the footpath from Ifield Church. The northern extent follows along the footpath and turns along the field boundaries back to the Rusper Road.</p>	<p>The area is open farmland and flood plain, with mature hedgerows and an a wealth of flora and fauna.</p> <p>The area along Ifield Brook, is wildlife rich. It supports a large number of birds including kingfishers and heron, which feed on the abundant fish life.</p>	30.86	No	<p>See Landscape Character Assessment LC4 and LC5</p>	<p>Development in this area would seriously impact the boundary of the new Maples development along the Rusper Road. This would break into the separation of the new development with Ifield to the north-east.</p> <p>The land along Ifield Brook also establishes the edge of Crawley and the start of Rusper parish. It provides a wildlife rich area with extensive examples of flora and fauna.</p> <p>The area falls in the Low Weald Northern Vales area LW8 of the WSCC landscape character assessment, which states that we should: <i>Conserve the mostly rural character of the area.</i> It recognises that “<i>Some localities retain an enclosed rural character, for instance, west of Ifield</i>” and encourages us to “<i>Conserve the open character of the floodplain and promote natural floodplain management avoiding the introduction of engineered flood defences</i>”.</p>

Spatial Plan Map 1

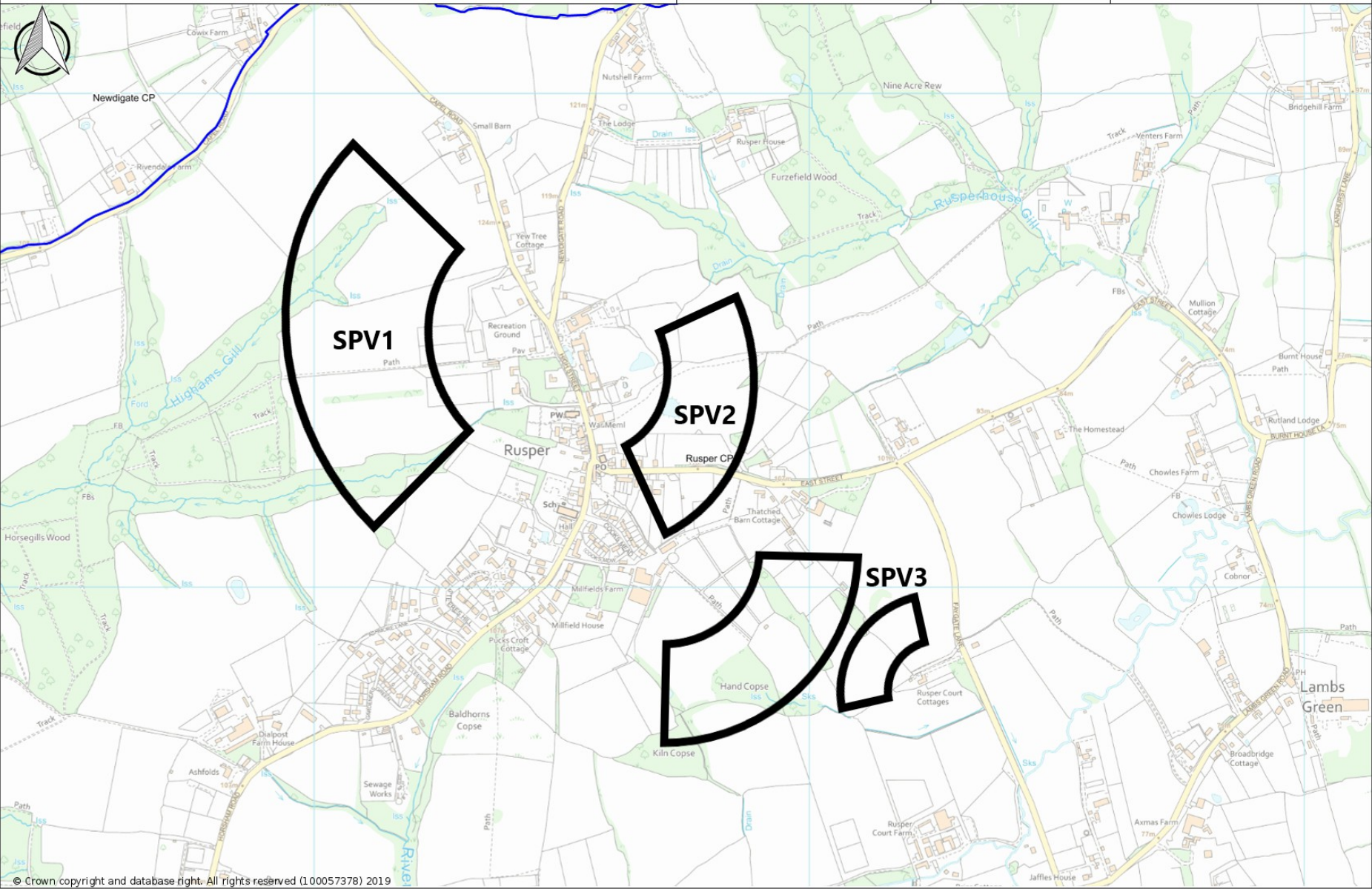


Spatial Plan Map 2



Spatial Plan Map 3

Special views within the plan area



Rusper Neighbourhood Plan Site Assessments		
Submitted sites or sites shown as potentially deliverable in HDC Housing SHELAA 2018.		
Site Reference	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
NP Ref.	RNP2019-6	RNP2019-17
Address	Rusper Glebe, High Street, Rusper, RH12 4PX.	Area to the west of Ifield Brook through to Faygate
Description	Housing with approximately 12 dwellings.	Homes England proposal for approximately 10,000 dwellings.
SHELAA Ref.	SA080	SA-101, SA-095, SA-295, SA-341 and SA-666 cover most of the area identified.
Site Location	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Size of Site	0.47 hectares	Approx. 750 hectares
Potential Number of dwellings (units per ha)	Approx 12 units	Approx 10,000 units
Deliverability – landowner willing to release the site	Yes	Partly
Context	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Current Use	Agricultural grazing	Mostly agricultural and ancient woodland.
Previous Uses	Agricultural grazing	Mostly agricultural and ancient woodland.
Surrounding Land Uses	Agricultural and limited housing.	Agricultural and limited housing.
Site Boundary	Hedgerow with mature trees in a conservation area.	Varied, mostly hedgerow, woodland and streams.
General Character – open countryside/edge of settlement/urban	The site is a rural agricultural setting outside of the main village settlement and build up boundaries. It is within the conservation area for the village.	Open countryside.
Topography - flat/sloping or undulating/steep gradient	Flat area with hedgerow.	Undulating.
Within BUBA	No	No
Adjacent to BUBA	Yes	No
Outside BUBA	Yes	Yes
Housing	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Able to accommodate affordable housing	Yes	Yes
Able to provide a range of housing types, sizes and tenures	Yes	Yes
Community Facilities and Access to Services*	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Distance to schools (primary)	0.2 miles	

Site Reference	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Distance to schools (secondary)	5.5 miles	
Distance to local shop(s)	0.2 miles	
Distance to Pub	0.1 miles	
Distance health facilities (doctors surgery)	3.1 miles	
Distance to community facilities (Village Hall)	0.2 miles	
Distance to local recreation facilities (MUGA/Recreation Ground)	Next door	
Opportunity to provide open space/ recreation/ community facility	Yes	
Biodiversity	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
European designation - SAC/SPA/RAMSAR	No	No
National designation - Site of Special Scientific Interest (SSSI)	No	No
Local designation - SNCI/LNR	No	No
Veteran Trees	Yes	Yes
Ancient woodland	No	Yes
Tree Preservation Order (within site/ boundary)	Yes, as part of conservation area.	Yes.
Record of protected species/habitats	None known	See Bio-Diversity report
Opportunity to enhance biodiversity and Green Infrastructure	No	No
Landscape	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Within SDNP	No	No
Adjacent to SDNP	No	No
Views into site (wide/framed/screened/long/short)	None significant	Significant views across the site from along the River Mole and Ifield Brook.
Views out of the site (wide/framed/screened/long/short)	Yes, limited views to the north across the sports field.	None significant.

Site Reference	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Inter village gap	This would significantly extend the village boundary into open countryside to the North of the village..	This would significantly extend the effective boundary of Crawley all the way to Lambs Green and Faygate leading to major coalescence of settlement areas.
Relationship to designated local green space	This is next to the village sports ground and part of the conservation area of the village.	This would destroy the undesignated Ifield Conservation Area..
Opportunity to enhance landscape	No	No
Heritage	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Impact on Listed Building and its setting	Yes, Grade 1 listed Church next to site.	Minimal impact on nearby Grade 2 listed St Margaret's Church..
Is the site located in/adjacent to the Conservation Area	Yes	Yes. The Ifield Conservation Area is in the centre of this proposed development.
Impact on locally listed building	Yes, Grade 1 listed Church next to site and Grade 2 listed building opposite.	Minimal impact on nearby listed buildings.
Impact on Scheduled Ancient Monument	None	Yes, this site would completely surround the Medieval moated site at Ifield Court.
Impact on Locally Listed Heritage Assets	Grade 1 listed Church.	No.
Other archaeological interest present	None	None
Opportunity to enhance heritage assets	None	None
Transport	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Distance to public transport (minimum hourly service)	2.7 miles	
Access to highway	Limited access onto unclassified country lane.	
Site generate significant additional traffic/congestion	Current growing traffic along High Street would cause a problem for access to this site.	
Pedestrian access	Access to limited village facilities, but no regular bus service for main services.	
Public rights of way present	No	
Access by bike	Cycling along the undesignated country lanes is dangerous.	
Economic Development	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Distance to employment sites	Horsham – 4.6 miles, Gatwick 8.4 miles, Crawley 5.5 miles	

Site Reference	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Loss of employment site	No	
Opportunity for employment	No	
Flooding	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Within Flood zone 1 (low risk)	Yes	Yes
Flood zone 2 (medium risk)	No	Yes
Flood zone 3 (highest risk)	No	Yes
Surface water flooding issues	None known	Significant surface water flooding occurs in this area, especially between Ifield Brook and River Mole.
Environmental Quality	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Water quality issues	No	
Air quality issues	No	
Any local noise issues	No	
Agricultural land classification	Grade 3	
Contaminated Land (usually applies to brownfield sites)	No	
Other	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Viability	Yes	
Waste and Minerals	No	
Summary	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)

Site Reference	Site 6 – Rusper Glebe	Site 17 – West of Ifield (Homes England)
Summary recommendation for Rusper Neighbourhood Plan inclusion or exclusion.	<p>This is a green field site and fails virtually all sustainability issues.</p> <p>It is on an undesignated country lane outside of the built up area on land currently designated as agricultural and used for grazing.</p> <p>It is more than 2.7 miles from the nearest regular bus service along country lanes with no footpaths.</p> <p>There are no services to the site and provision of main drainage would be a significant issue.</p> <p>There is no identified need from the Housing Needs Assessment for this development. This site has been identified as a potential site for future improvements to the sports and social provision for the village.</p> <p>It was designated as “Sites considered developable 6-10 years” in the HDC 2016 SHELAA report, but this did not consider the need for community facilities.</p>	<p>This is a green field site and fails virtually all sustainability issues.</p> <p>It is across a wide range of wildlife habitats and would impact existing wildlife corridors. There would be a significant loss of bio-diversity especially along Ifield Brook and the River Mole.</p> <p>This area is identified in the emerging Neighbourhood Plan as an important gap to separate Lambs Green and Faygate from Crawley and more importantly to avoid the convergence of Crawley and Horsham.</p> <p>There is no identified need from the Housing Needs Assessment for this development.</p> <p>The recent HDC SHELAA 2018, identified this area as “Not Currently Developable” and Crawley Borough Council have already raised objections to the proposal.</p> <p>Much of the area between Ifield Brook and the River Mole is a flood zone and development here would seriously impact flood risk further upstream on the River Mole.</p> <p>Ifield Golf Course is an important local amenity: loss of this sport and recreation facility would be contrary to HDPF policy 43.</p>
Estimated number of deliverable hou	0	0
Estimated number of potentially deliv	0	0
Estimated number of non-deliverable	12	0

Total number of already approved houses

Total number of potentially deliverable houses

Total number of non-deliverable houses

Additional note:

Rusper Neighbourhood Plan Site Assessment

Site 6 Rusper Glebe

NP Ref.	RNP2019-6
Address	Rusper Glebe, High Street, Rusper, RH12 4PX.
Site Area (Ha)	0.47 hectares
SHELAA Ref.	SA080
Description	Housing with approximately 12 dwellings.
Site Capacity	Approx 12 units
Planning History	None
Infrastructure	Site is a green field development with no existing infrastructure. Gas is not available in the area and this site is not close to existing main drainage.
Conformity with Local Plan Policies	This land is currently designated as agricultural, with no local plan policies supporting any development. Development would be contrary to Policies 1 to 4 and 26 of the HDPF.
Opportunities	This site had been identified as a possible site for future community facilities as a replacement for the aging Village Hall and the Sports Pavilion next door.
Constraints	<p>Green field site, outside and not adjacent to the current built up area of the village.</p> <p>More than 2.7 miles to nearest regular bus service.</p> <p>Access onto the High Street would be a problem as it is close to the junction with Capel Road and has the hotel entrance opposite.. The increasing volume of traffic along High Street would also be a problem.</p> <p>No mains drainage to the site.</p>

Conclusions	<p>This is a green field site and fails virtually all sustainability issues. It is on an undesignated country lane outside of the built up area on land currently designated as agricultural and used for grazing. It is more than 2.7 miles from the nearest regular bus service along country lanes with no footpaths.</p> <p>There are no services to the site and provision of main drainage would be a significant issue.</p> <p>There is no identified need from the Housing Needs Assessment for this development. This site has been identified as a potential site for future improvements to the sports and social provision for the village. It was designated as "Sites considered developable 6-10 years" in the HDC 2016 SHELAA report, but this did not consider the need for community facilities.</p>
Summary of Sustainability Appraisal/SEA of this site/policy?	N/A

Rusper Neighbourhood Plan Site Assessment

Site 17 West of Ifield

NP Ref.	RNP2019-17
Address	Area to the west of Ifield Brook through to Faygate
Site Area (Ha)	Approx. 750 hectares
SHELAA Ref.	SA-101, SA-095, SA-295, SA-341 and SA-666 cover most of the area identified.
Description	Homes England proposal for approximately 10,000 dwellings.
Site Capacity	Approx 10,000 units
Planning History	None relevant
Infrastructure	Site is a green field development with no existing infrastructure.
Conformity with Local Plan Policies	This land is currently agricultural and woodland, with no local plan policies supporting any development. Development would be contrary to Policies 1 to 4 and 26 of the HDPF.
Opportunities	
Constraints	Green field site, outside and not adjacent to any current built up area..
Conclusions	<p>This is a green field site and fails virtually all sustainability issues. It is across a wide range of wildlife habitats and would impact existing wildlife corridors. There would be a significant loss of bio-diversity especially along Ifield Brook and the River Mole.</p> <p>This area is identified in the emerging Neighbourhood Plan as an important gap to separate Lambs Green and Faygate from Crawley and more importantly to avoid the convergence of Crawley and Horsham.</p> <p>There is no identified need from the Housing Needs Assessment for this development.</p> <p>The recent HDC SHELAA 2018, identified .this area as “Not Currently Developable” and Crawley Borough Council have already raised objections to the proposal.</p> <p>Much of the area between Ifield Brook and the River Mole is a flood zone and development here would seriously impact flood risk further upstream on the River Mole.</p> <p>Ifield Golf Course is an important local amenity: loss of this sport and recreation facility would be contrary to HDPF policy 43.</p>
Summary of Sustainability Appraisal/SEA of this site/policy?	N/A

Rusper Neighbourhood Plan Site Assessment

Colour coding keys and document references.

Colour Coding Keys

Assessment Code Scoring (as defined by HDC)

Level of Impact (Heritage)	Distance to Services/Employment
Significant Impact	Greater than 1KM
Potential Impact	Between 500m to 1KM
Minimal Impact	Between 0m to 500m
Not Relevant	n/a

Code for Assessment Headings (as recommended for NP)

Not recommended for development within the Rusper Neighbourhood Plan
Potential for development if things change in future.
Decided and at least outline planning granted.

Document References

Title	Description	Link
Strategic Housing & Economic Land Availability (SHELAA)	Main Horsham District Council (HDC) site for housing availability studies for the District. Includes links to relevant documents used for this NP assessment.	HDC SHELAA reference page
SHELAA 2016 – Rusper Parish Strategic Housing and Economic Land Availability Assessment (SHELAA) Housing Report 2016	Rusper specific HDC SHELAA sites. HDC 2016 Housing SHELAA complete.	Rusper specific HDC SHELAA sites HDC 2016 Housing SHELAA complete
Strategic Housing and Economic Land Availability Assessment (SHELAA) Housing Report 2018	HDC 2018 Housing SHELAA still in consultation.	Not yet released (Dec 2018)
SHELAA Economic Land Assessment 2018	HDC 2018 Economic Land Assessment. This did not identify any sites in Rusper Parish as deliverable.	SHELAA Economic Land Assessment 2018

Technical note No 1

Rusper Parish Council - Highways and Transport Technical Advice Land West of Ifield, Crawley

1. Introduction and Background

1.1 Introduction

The Alan Bailes Consultancy Ltd. (ABC) have been appointed by Rusper Parish Council (RPC) to provide transport and highways advice on a proposed new sustainable garden community, including 10,000 plus new homes on “Land West of Ifield, Crawley” (Wol).

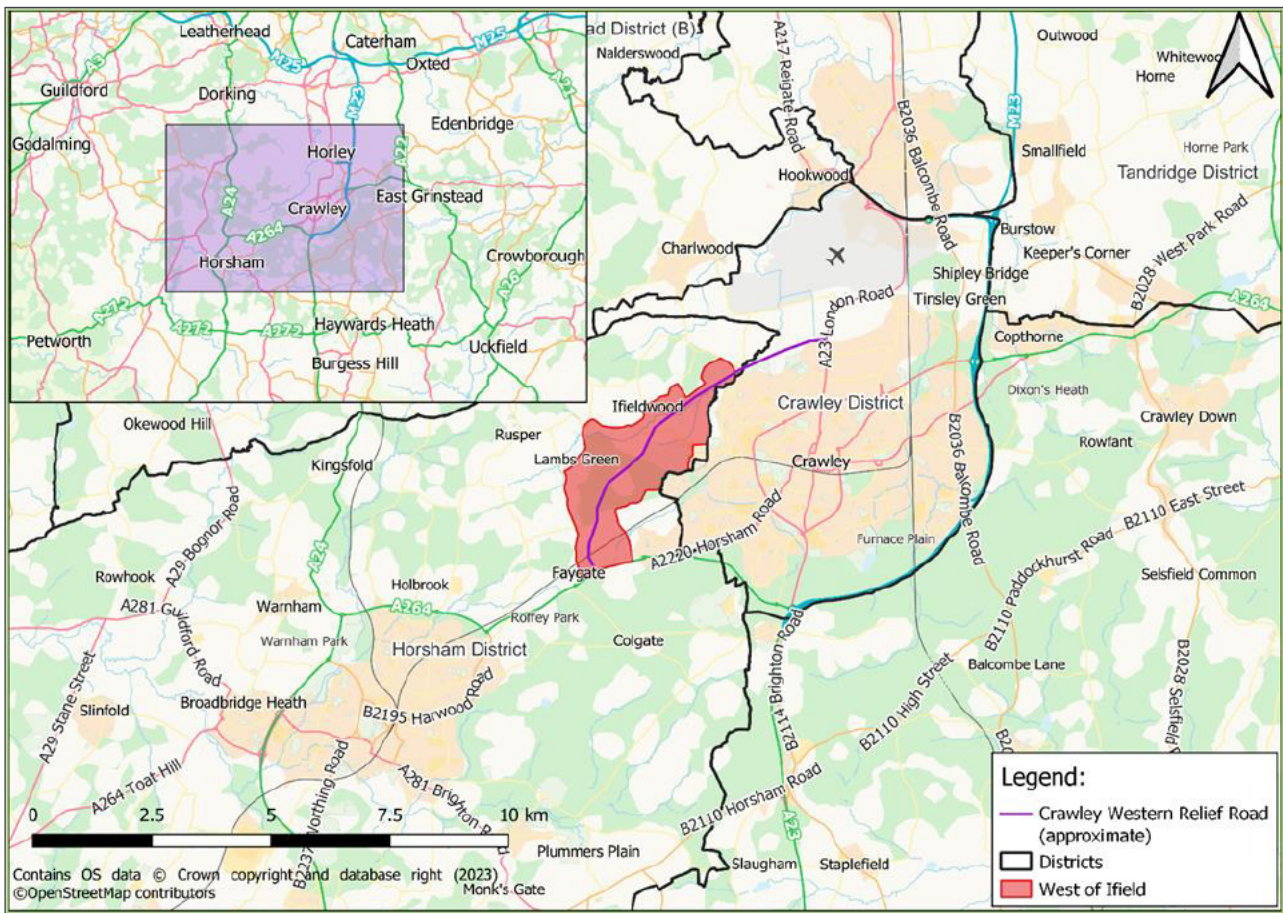
1.2 Background and Context

The Land West of Ifield (Wol) site has been identified in the Homes England Strategic Plan as a priority for investment. It forms an area of land which sweeps in a broad arc around the western edge of Crawley, from Faygate in the south west to Gatwick in the north east and is being promoted as having potential for up to 10,000 homes. It is suggested this area could be delivered as three new neighbourhoods of Crawley in the medium to longer term.

Homes England and Horsham District Council view the full proposal for 10,000 houses as a ‘strategic opportunity’, but the current focus is on delivering around 3,000 houses as the first phase. Confusingly, this is also called the West of Ifield site. In this report the sites or phases are referred to as the 3k and 10k Sites, namely: **Wol 3k or Wol 10k**.

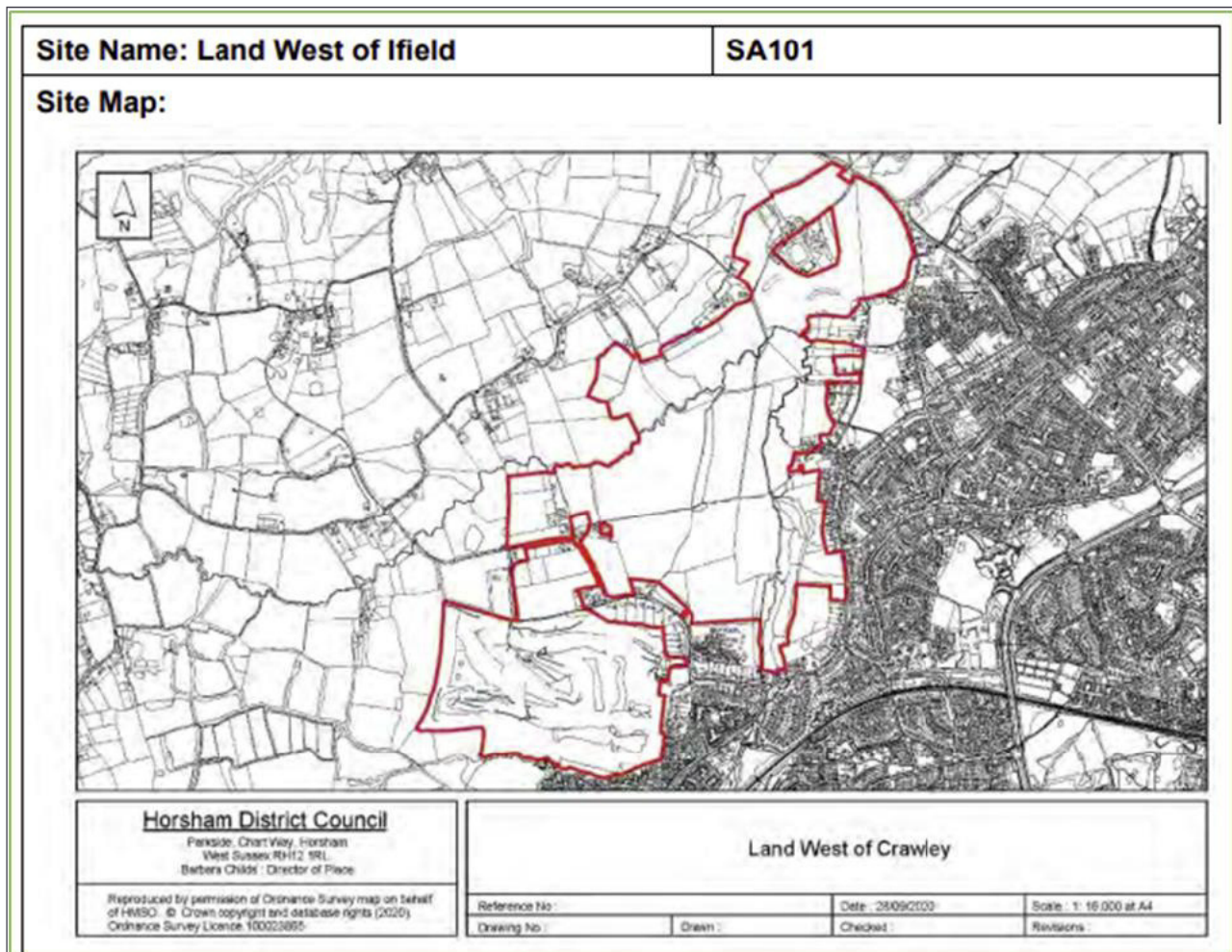
The land for the Wol 3k site (phase 1) is owned and controlled by Homes England and was allocated within the Horsham District Local Plan 2021 – 38 Regulation 19 Draft Document. The Wol 10k proposal is also referred to throughout the Plan, however, as a future opportunity. It is proposed that 35% of the houses delivered across the sites would be affordable. The location of the Wol 10k site is given at **Figure 1.1** and the Wol 3k site, owned by Homes England, at **Figure 1.2**.

Figure 1.1: Location of the West of Ifield Development and the Proposed Crawley Western Relief Road



The first phase of the Wol development site for around 3,000 dwellings, is included in the new draft Crawley and Horsham Local Plans in the period up to 2038 and has also been included within the respective Transport Models. The remaining 7,000 dwellings are to be brought forward as part of the Crawley and Horsham Local Plan Reviews (source Homes England Members Presentation 2019 and Horsham District Council Local Plan). **Figure 1.2** shows the location of the Wol first phase for around 3,000 dwellings.

Figure 1.2: Location of the First Phase of the Wol Site

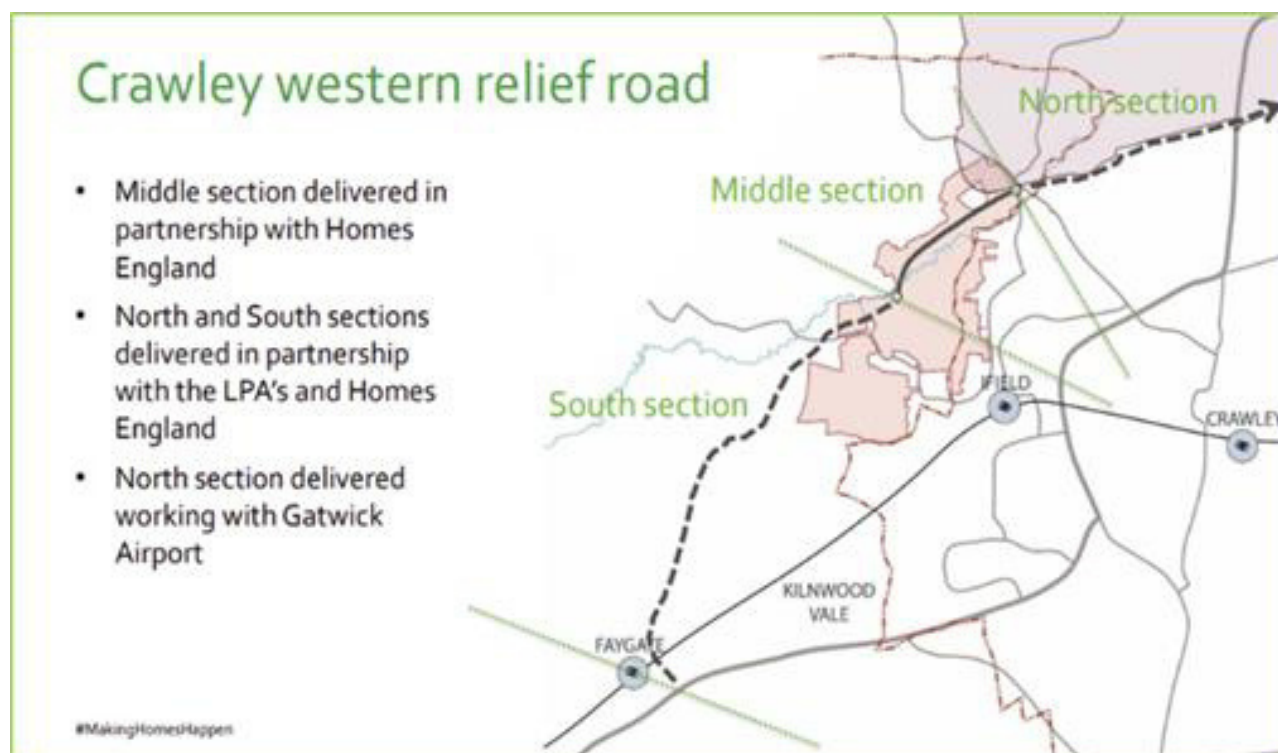


Source: Appendix 6 - Assessment of Potential Housing Allocations for Allocation in the Horsham District Local Plan

The assessment of the Wol 3k site as set out in Appendix 6 from the Regulation 18 consultation is given at **Appendix A**, whilst **Appendix B** gives the Strategic Site Allocations Strategic Policy HA2: Land West of Ifield from the Horsham District Local Plan 2021 – 38 Regulation 19 Draft Copy

As part of the Wol 10k development proposals there are plans to construct a Crawley Western Relief Road (CWRR). The full extent of the alignment of the proposed CWRR is given at **Figure 1.3**.

Figure 1.3: Approximate Alignment of the Crawley Western Relief Road.



Source: Homes England

It is anticipated that a full Crawley Western Link Road (as termed in the Draft Local Plan) and multi-modal corridor will be required to mitigate the impact of wider traffic growth in and around Crawley in addition to the development of the additional WoI houses in this location. The full Link Road will need to connect the A264 at Faygate to the A23 south of Gatwick Airport, north of County Oak.

1.3 Document Review

The following documents have been reviewed and utilised in the preparation of this Technical Note:

- Horsham District Local Plan Regulation 18 Consultation Document.
- Horsham Transport Study: Local Plan Preferred Scenario Transport Assessment, Stantec, May 2021;
- Horsham District Local Plan 2021 – 2038: Regulation 19 Draft Copy;
- Draft Crawley Borough Local Plan 2024-2040, May 2023;
- Land west of Ifield, Crawley, Members Presentation 29 July 2019, Homes England;
- Information and documentation from the West of Ifield website (www.westofifield.commonplace.is).

1.4 Purpose of the Technical Note

The purpose of Technical Note is to set out the findings resulting from a review of documents set out in Section 1.3. Following the document review the note then goes on to undertake an appraisal of the

allocation of the Land West of Ifield within the Horsham District Local Plan 2021 – 38: Regulation 19 Draft Copy. The note also set out how the outcome of the appraisal and how they relate to the current national and local policies as they relate to transport.

Finally, the note then refers to the site's suitability to go forward into the Approved Horsham Local Plan.

2. Relevant Policies

2.1 Introduction

As discussed above the site allocation for the Land West of Ifield is set out in the Horsham District Local Plan 2021 – 2038: Regulation 19 Draft Copy and in order to make any objections on Transport and Highway grounds within the Regulation 19 process the bringing forward of the WoI sites will need to be contrary to current national and local transport policy.

This section sets out the current national and local policies as they relate to transport and under which any consultations representations will carry weight.

2.2 National Planning Policy Framework

In achieving sustainable development, the purpose of the planning system is to contribute to meeting sustainable development where at a very high level the objective of sustainable development can be summarised – *“as meeting the needs of the present without compromising the ability of future generations to meet their own needs”* (NPPF paragraph 7)

In assessing specific development sites for development and inclusion within Local Plans, the key paragraphs in NPPF as they relate to transport are:

With regards to “Identifying land for homes” in respect of transport, NPPF at **paragraph 73** states:

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).” (ABC Emphasis)

This emphasis on genuine choice of transport modes is backed up at **Section 9 “Promoting Sustainable Transport”**, which states at 104:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;”*

and at **Paragraph 106**:

“Planning policies should:

- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;”*

When considering development proposals NPPF at **Paragraph 110**, states that plans and decisions should take account of whether:

- *‘Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- *Safe and suitable access to the Site can be achieved for all people; and*
- *Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.’*

Paragraph 111, which refers to the impacts on highways and states:

- *‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’*

Paragraph 112, which identifies those developments should be located and designed where practical to:

- *‘Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- *Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.’*

2.3 Local Transport Policies

The Local Transport Policies as they relate to Wol are set out in the current Horsham District Planning Framework, dated November 2015. The District Council in January 2023 announced a delay to the forthcoming review of the Local Plan and as such the current plan’s relevant policies are considered below at a high level. These policies could change as a revised Local Plan is currently being advanced by the Council.

Policy 1 Strategic Policy: Sustainable Development - *When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.*

Policy 2 Strategic Policy: Strategic Development - *To maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services and local employment.*

Policy 39 Strategic Policy: Infrastructure Provision:

- 1. The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development, or suitable necessary mitigation arrangements for the improvement of the infrastructure, services and community facilities caused by the development being provided.*
- 2. Where there is a need for extra capacity, this will need to be provided in time to serve the development or the relevant phase of the development, in order to ensure that the environment and amenities of existing or new local residents is not adversely affected.*
- 3. To ensure required standards are met, arrangements for new or improved infrastructure provision, will be secured by planning obligation / Community Infrastructure Levy, or in some cases conditions attached to a planning permission, so that the appropriate improvement can be completed prior to occupation of the development, or the relevant phase of the development.*

Policy 40 Sustainable Transport - *There is commitment to developing an integrated community connected by a sustainable transport system. In order to manage the anticipated growth in demand for travel, development proposals which promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged and supported.*

3. Document Findings

3.1 Development Proposals

The proposed West of Ifield (Wol) 10k development site lies immediately west of Crawley in the rural Parish of Rusper and has the potential for more than 10,000 dwellings. The first phase of the development, as set out in the Horsham Draft Local Plan is expected to consist of 3,250 dwellings and lies to the north-east of the land allocated for the whole development (Figure 1.2). This first phase (Wol 3k) is covered in both the Crawley Draft Local Plan and Horsham Draft Local Plan, and their associated transport models and studies, however the quantum of the first phase differs slightly between models. Further, the West of Ifield Consultation website also states a slightly differing figure. These are:

- The Crawley Transport Model includes 3,750 dwellings;
- The Horsham Transport Study includes 3,250 dwellings; and
- The West of Ifield consultation FAQ's state that the first phase of the development has been reduced to 3,000 dwellings.

For the whole of the Wol 10k development to be accommodated from a highways perspective, it has been proposed that the new Crawley Western Relief Road (CWRR) is required¹; this link will connect the A264 in the south to the A23 in the north and pass through the development. However, for the Wol 3k development, only the middle section of the CWRR is proposed and subsequently modelled within the Crawley and Horsham Traffic Models. This middle section of the CWRR will only connect to Rusper Road in the south-west and Charlwood Road in the north-east, thus channelling all traffic from the development onto these two rural roads. It will also allow access off the CWRR into the first phase (3,000 dwellings) of the Wol 3k site.

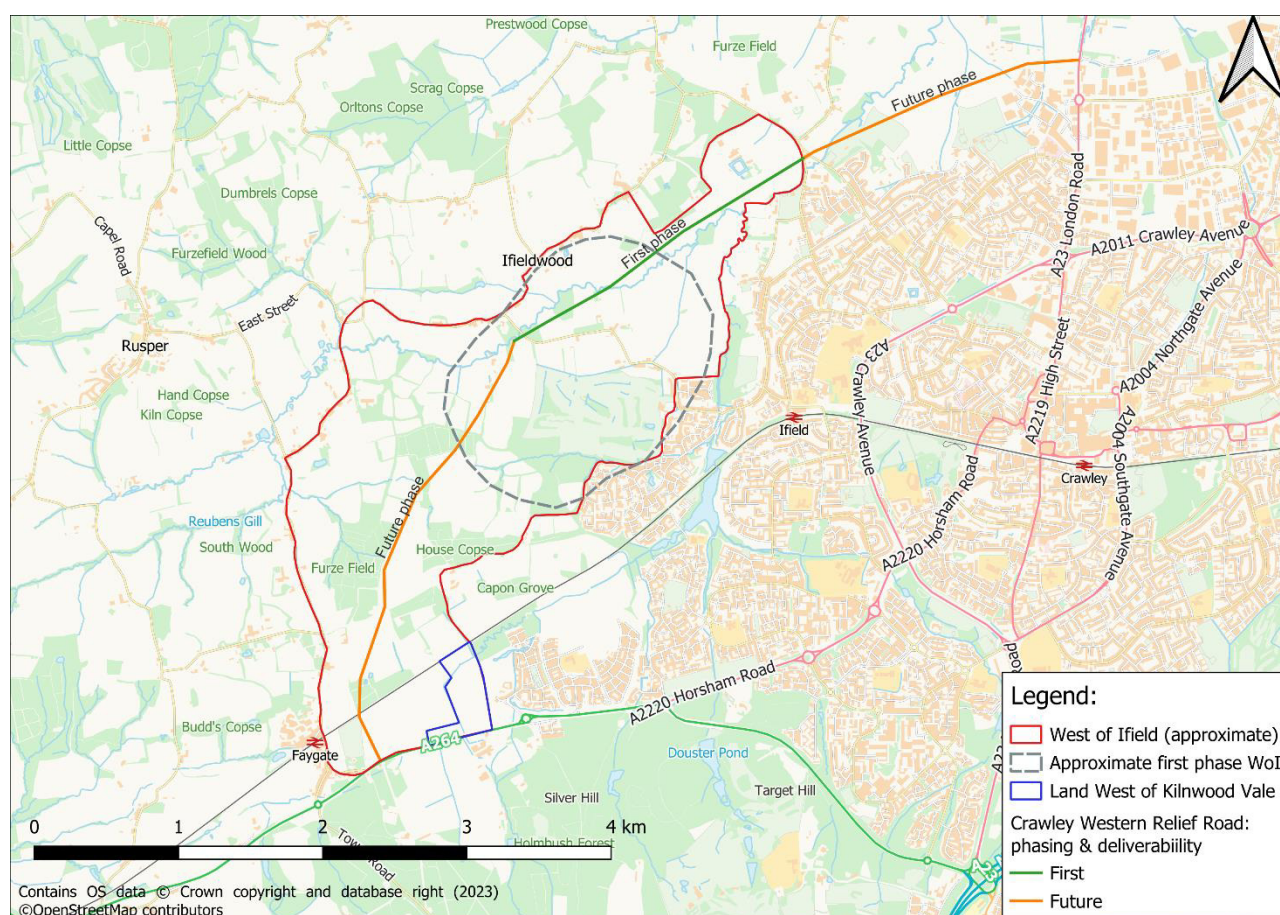
¹ Homes England

In addition to the WoI 3k development, there is an additional housing development proposed at the southern portion of the WoI land, namely the West of Kilnwood Vale development. Similarly, the Crawley Transport Study and the Horsham Transport Model have differing dwelling numbers for this development. It is important to note the relevance of the development as it lies within the immediate vicinity of the WoI 3k development, is included in the same modelling scenario as the WoI 3k development in the Crawley Transport Model and is treated as part of the WoI 3k development in the Horsham Transport Study. The number of dwellings for the West of Kilnwood Vale development considered are:

- The Crawley Transport Model includes 1,546 dwellings; and
- The Horsham Transport Study includes 350 dwellings.

The approximate development proposal extents included in the transport models are shown in **Figure 3.1** below.

Figure 3.1: Development proposals



3.2 Transport Models

The Draft Crawley Local Plan uses, as part of its evidence base, the Crawley Saturn Transport Model² (CTM), which is described in the Crawley Transport Study reports.

² SATURN is a highway-based transport model with no allowance within to adjust for mode shift to public transport, cycling or walking.

The Horsham District Local Plan uses the Horsham Highway Model, which is described in the Horsham Transport Study. This is also a Saturn model with no allowance within the model to adjust for mode shift to public transport, cycling or walking.

Table 3.1 summarises the pertinent points as output and recorded from each model.

Table 3.1: Summary and Comparison of Crawley and Horsham Transport Models

Item	Crawley Transport Model	Horsham Transport Model
Wol 3k development extents	Phase 1 only, with 3,750 dwellings	Phase 1 only with 3,250 dwellings
West of Kilnwood Vale development extents	1,546 dwellings	350 dwellings
Trip generation	Wol and Kilnwood Vale combined. AM peak: 3,612 trips PM peak: 3,979 trips	Wol and Kilnwood Vale combined* AM peak: ~2,132 trips PM peak: ~1,884 trips
Trip reduction	<ul style="list-style-type: none"> Internalisation of trips reflected in trip generation totals. 5% reduction in local car trips with the assumption that they will switch to cycling. 12% car trip reduction to trips on the local network because of bus, cycling and walking infrastructure improvements 	<ul style="list-style-type: none"> 12% car trip reduction to trips to Crawley Town Centre Range of car trip reductions based on travel distance; range from 22% for 1km trips to 3% for 10.1km - 50km trips. 12% due to internalisation factors Trip reductions for sustainable measures, ranging from 5% to 9%
Highways impacts	<ul style="list-style-type: none"> Flow increases on minor roads to the west of Crawley including: <ul style="list-style-type: none"> Rusper Road Ifield Green Ifield Avenue Ifield Drive Capacity constraints on Crawley Avenue Flow increases on M23 (northbound and southbound) 	<ul style="list-style-type: none"> Ifield Avenue / Stagelands junction Ifield Roundabout Ifield Avenue/ Rushetts Road Ifield Avenue/ Warren Drive
* Estimated from trip rates and development extent as no trip generation totals provided		

It can be seen from Table 3.1 that the two models appear to have some significant differences in the extent of the Wol 3k development, including the trip generation and trip reduction rates. It is important to note that, in the absence of trip generation figures provided in the Horsham Transport Model, this has been estimated based on the trip rates and development extents provided in the relevant study reports.

It should be noted that both models apply generous trip reduction rates to the Wol 3k development, based on internalised trips, and car trip reductions based on trips to major centres, journey length and sustainable measures.

It can further be seen from Table 3.1 that with the inclusion of the first phase of the development, even with generous amounts of trip reduction rates, the roads surrounding the Wol 3k development have been shown to have capacity constraints in the scenarios modelled as a result of the flow increase on the minor roads.

This increase in traffic on the surrounding road network as a result of the Wol (3k) site is contrary to both NPPF sections 106 and 111, as well as the Horsham District Planning Framework Policies 2 and 39.

3.3 Public Transport

As stated in the Horsham District Local Plan Regulation 19 draft copy, “public transport provision within the district is poor and there is a high reliance on the car”. The nearest train stations to the proposed Wol 3k development are Ifield Station and Faygate Station, and the nearest bus routes travel through Kilnwood Vale, Ifield West and Bewbush. No detail of new public transport provision, such as type, routes and frequency, to facilitate the Wol 3k development has been provided.

With regards to the existing public transport provision, Ifield Station is some 1.8km from the approximate centre of Phase 1 of the development, whilst Faygate Station is over 5km away. Important to note is that both stations only have 2 trains per hour in the weekday peaks, per direction. The nearest station at Ifield station is dated with narrow platforms, in addition it has no car parking, passenger drop off or bus facilities (the nearest bus stops are some 200m distant) to encourage its use, as indicated at **Figure 3.2**.

Figure 3.2: Ifield Station



Figure 3.3 shows the walking catchment of the bus stops and train stations nearest the Wol 3k development, with a 400m walk to a bus stop and a 1,200m walk to a train station considered to be

reasonable³. It is clear from Figure 3.3 that the walking distances to the nearest bus stops and train stations from anywhere within the proposed Wol 3k development, except for the periphery, is substantially further than is considered reasonable to attract public transport users and consider the site sustainable, a test within both NPPF and Local Plan Policies.

The Chartered Institute for Transport (CIHT) – Planning for Walking (2015) document reinforces this point which adds that the power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000). People will walk up to 800 metres (with a preferred maximum of 1200 m) to get to a railway station, which reflects the greater perceived quality or importance of rail services. It also states that:

“Most people will only walk if their destination is less than a mile away”.

and

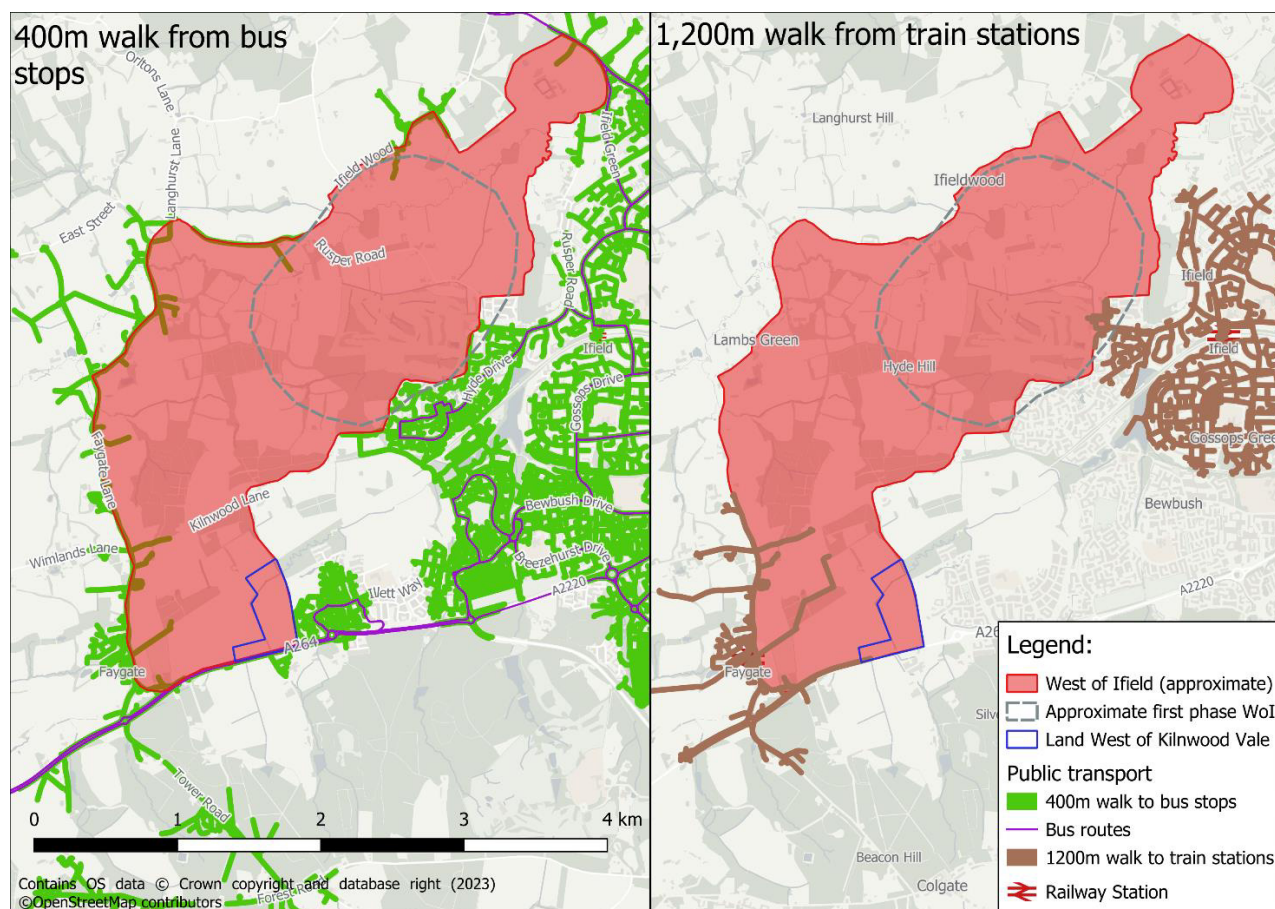
“Land use patterns most conducive to walking are thus mixed in use and resemble patchworks of “walkable neighbourhoods,” with a typical catchment of around 800 m or 10 minutes’ walk”.

³ CIHT document “Providing Journeys on Foot”

Table 3.2: Suggested Acceptable Walking Distance.

	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

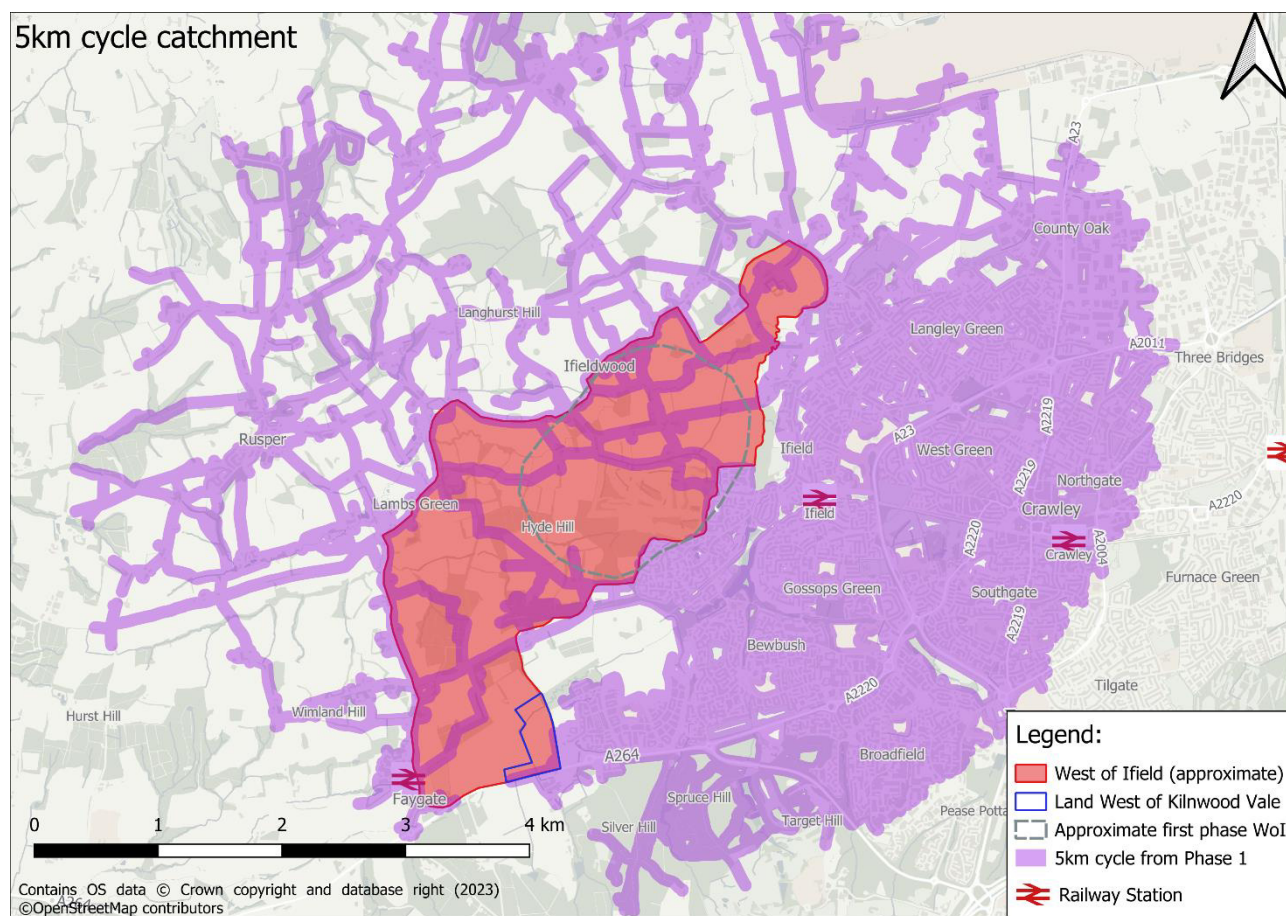
Figure 3.3: Walking catchments to existing public transport.



It is the generally accepted industry standard that an acceptable distance for cycling trips is up to 5km, and **Figure 3.4** shows this catchment, from the approximate centre of the first phase of the WoI 3k development. This catchment includes Ifield, Faygate and Crawley Train Stations, although Crawley and Faygate Station are located at the far end of the catchment. The catchment also includes parts of Crawley Town Centre.

Part of the WoI 3k development proposals include upgrades to Ifield Train Station; however, these proposals only include upgrades to the cycle parking and bus interchange at the station. No upgrades to increase train or platform capacity or even frequency is proposed. This is not expected to make the use of the train station substantially more attractive to commuters, and to access more frequent train services commuters will need to cycle almost 5km to Crawley Station, where they will then change modes. Crawley Station has some 4 trains per hour in the peaks.

Figure 3.4: Cycle catchment



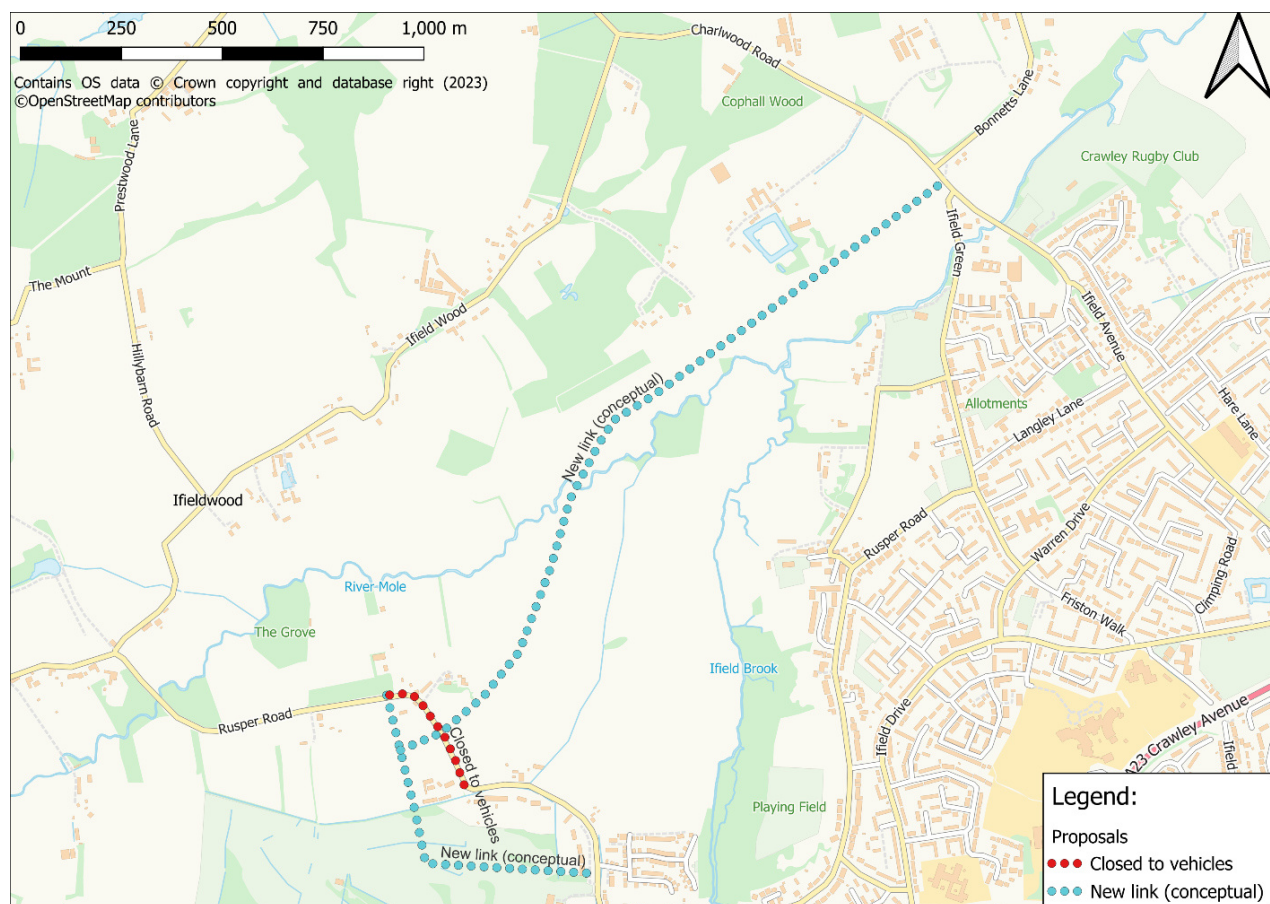
Overall, the WoI 3k site due to its remote peripheral location does not appear to be situated in the most sustainable of locations and does not allow for the appropriate opportunities to promote sustainable transport modes. This lack of ability to promote sustainable travel can therefore be seen as contrary to both NPPF sections 106 and 110, as well as the Horsham District Planning Framework Policies 1 and 40.

3.4 Transport Constraints

Both the Draft Horsham Local Plan and Draft Crawley Borough Local Plan, based on the modelling in their evidence base, propose that only the middle section of the Crawley Western Relief Road (CWRR) be constructed to provide access to the WoI 3k site. This section will connect from Rusper Road in the south to Charlwood Road in the north. Such a connection will serve only to provide access to the development and will not provide a direct link into Crawley or to a major strategic route. Therefore, most of the development traffic is likely to use Rusper Road, Charlwood Road, Ifield Avenue and the minor roads of west Crawley to access the A23 and Crawley Town Centre. Further, the proposals suggest that a section of Rusper Road will be closed to vehicles, with a new link constructed through the development which will connect Rusper Road (north) to Rusper Road (south). It is clear from these proposals that all WoI 3k development traffic will be required to utilise the lower order roads of Ifield Avenue, Charlwood Road or Rusper Road to access the development. **Figure 3.5** below illustrates these connections, conceptually, as depicted in the West of Ifield (3k) Masterplan⁴.

⁴ <https://westofifield.commonplace.is/en-GB/proposals/consultation-2022-our-plans-for-west-of-ifield/step1>

Figure 3.5: Wol 3k Access Proposals



The following is a brief description of each of the roads mentioned above as they currently exist:

- Rusper Road is a narrow single carriageway rural road, with no footpaths. It is rural in nature with no lighting, and with carriageway widths of c.5.2 m;
- Charlwood Road is a single carriageway road, with no hard shoulders. It is rural in nature with no lighting (except for its junction with Ifield Avenue/ Ifield Green), with widths of c.6 – 7 m;
- Ifield Avenue is a single carriageway road with widths of mainly c.8m. It is mainly semi-rural and suburban in nature and has lighting.

Significant trip reductions have been suggested in the modelling of the Wol 3k development, with a high proportion of these reductions based on the provision of and/ or contribution to sustainable transport measures, including bus services and bus rapid transit routes. The proposals for highways access as mentioned above, would mean that any bus services would be required to use Rusper Road, Charlwood Road and/ or Ifield Avenue to access the development. It is not clear from any of the documentation reviewed how these bus services will be accommodated on these roads, and whether any upgrades to the roads will be made to facilitate additional bus services.

Furthermore, while some localised mitigating measures and upgrades have been proposed to a limited number of junctions near the development, there are still a vast number of local roads and junctions surrounding the development which will need to accommodate traffic travelling towards Crawley and major routes such as the A264 and the A23. It is not clear how the remaining junctions and links surrounding the development will accommodate development traffic, particularly should the trip reductions proposed in both the Crawley and Horsham transport models not materialise. Important to note

also is that the junction of Ifield Avenue and Stagelands is identified as a hotspot in the Horsham Transport Study; there do not appear to be any mitigation measures proposed for this junction.

Finally, the Draft Crawley Local Plan states that:

“Without commitment to the construction of a full Western Multi-Modal Transport Link between the A264 and A23 (North), all the traffic from any development to the west of Crawley, from permitted schemes and any future proposals which could emerge through the Horsham District Plan Review and/or through planning applications permissions granted as windfalls, is likely to feed into residential roads in Ifield and/or Langley Green and onto the already congested A23 junctions, particularly the Ifield Avenue/A23 junction in the long term.”

It can therefore be concluded that the existing surrounding highway, particularly the lower order roads, will be severely negatively impacted by the Wol 3k development if only the middle section of the WRCC is constructed; it is clear that the entire length of the CWRR between the A264 and the A23 should be considered as part of the Wol 3k development.

3.5 Other Transport Infrastructure Upgrade Proposals

The document review revealed the following sustainable transport proposals including “a high-quality bus corridor that would be extended to serve these proposed developments [Wol 3k and West of Kilnwood Vale], linking to key destinations including Crawley Town Centre and Manor Royal, as well as improvements to cycling and walking infrastructure”. However, there is not enough available detail on extent, frequencies, capacities, accessibility and implementation timeframes to be able to make a comfortable determination on the ability of these proposals to satisfactorily reduce the traffic generated by the development, and its impact on the surrounding highway.

3.6 Summary

The following can be summarised from the above:

- The full Wol development has the potential for 10,000 dwellings, however the first phase (Wol 3k) has an extent of 3,000 to 3,750 dwellings. This extent differs between sources with the Wol 3k consultation stating 3,000 dwellings, the Horsham Transport Study stating 3,250 dwellings and the Crawley Transport Study stating 3,750 dwellings;
- The Crawley Western Relief Road (CWRR) linking the A264 to the A23, travelling through the Wol 10k development, has been proposed to accommodate the full Wol 10k development, however only a middle section of this road has been proposed to accommodate the Wol 3k development. This will link between Rusper Road and Charlwood Road. Provision of this section of road will serve only to provide access to the Wol 3k site, thereafter new development traffic will be forced to use the existing minor rural roads around the development to access Crawley Town Centre, the A264, the A23 and other major routes;
- Both the Crawley Transport Model and the Horsham Transport Model take the Wol 3k development into account, however their extents, trip generation and trip reduction rates differ. Further, both models apply generous trip reduction rates to the development based on internalised trips, and car trip reductions based on trips to major centres, journey length and sustainable measures;

- It has been shown in the models that the roads surrounding the development will experience capacity constraints. Should the above-mentioned trip reduction measures not be fully successful, these capacity constraints will be exacerbated and contrary to both National and local policies;
- Several sustainable measures including provision of walking, cycle and public transport services and infrastructure have been proposed; however, there is limited detail on these measures and it is difficult to conclude that they will successfully mitigate against the additional trip generation from the development; and
- It has been shown that the existing public transport provision and access associated with the Wol 3k development is poor and therefore unlikely to assist significantly to mitigate against new traffic generation from the development and contrary to both National and local policies.

4. Impact on Rural Roads and Villages

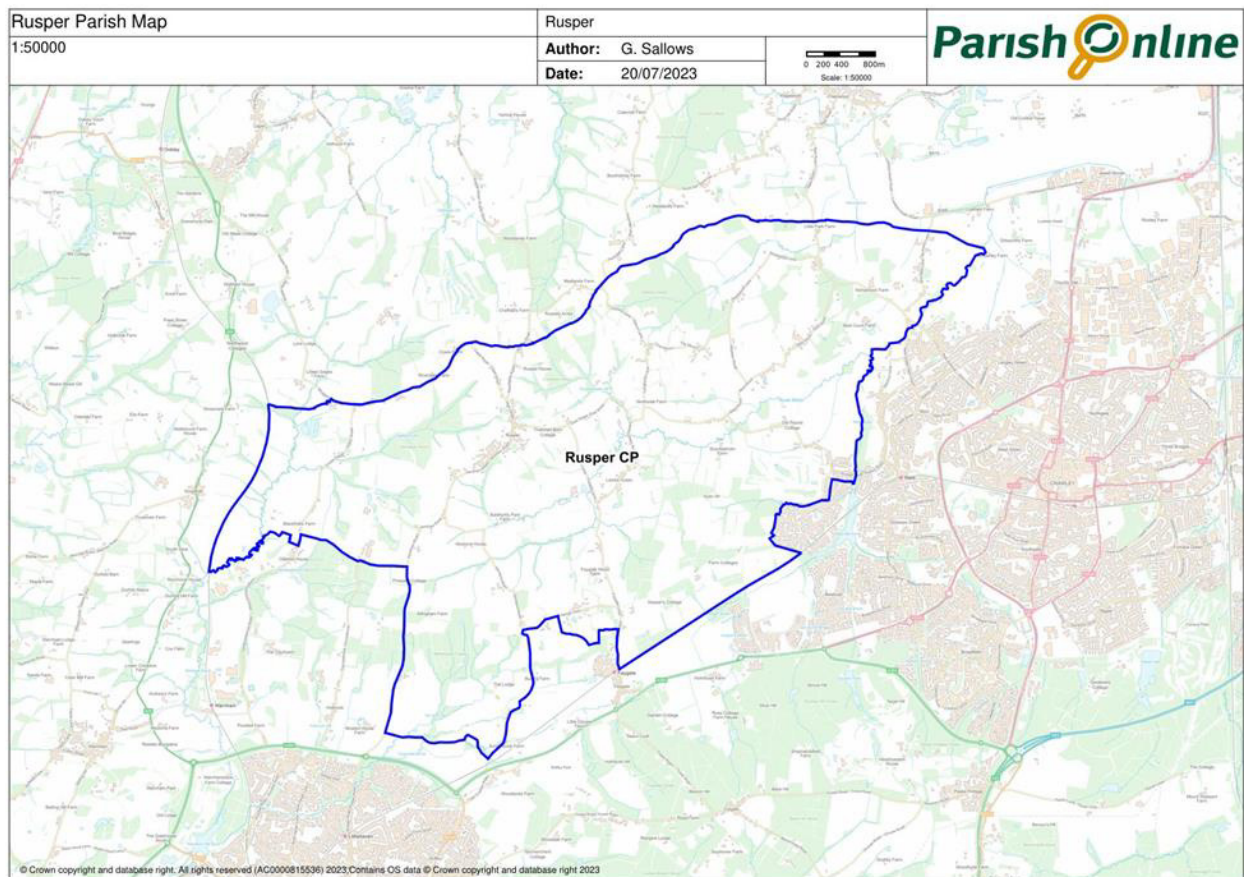
4.1 Introduction

The Wol 3k land as proposed within the draft Horsham Local Plan lies almost extensively in the Parish of Rusper.

The Parish of Rusper (PoR) is rural in nature, whereby the total area is 2,588.56 hectares with a perimeter distance of 30.6km. In 2020 there were 690 dwellings in the parish, but it is now around 940 dwellings, giving around 0.4 dwellings per hectare. These figures do not include for the proposed developments at North Horsham (Mowbray) and Kilnwood Vale, which between them will add approximately another 800 dwellings into the Parish. The population in 2020 was around 1,635 people in the parish, giving around 0.65 persons per hectare.

Figure 4.1 shows the rural extent of Rusper Parish.

Figure 4.1: Extent of Rusper Parish



4.2 Transport Characteristics

Given its rural location, PoR only has C class roads within its area, there are no A or B class roads in the Parish, whereby all the roads, apart from where Charlwood Road meets Ifield Avenue, are around 5.2 metres in width with no footpaths. These rural roads exhibit poor horizontal alignment with no footpath provision, the speed limit in the parish on these roads are 40mph. In addition, being rural in nature the roads are extensively used by horse riders, as demonstrated by the plethora of equestrian establishments in the area, together with cyclists and walkers.

Figures 4.2 to 4.3 demonstrates the limitations of the road network throughout the Parish.

Figure 4.2: Rusper Road Village

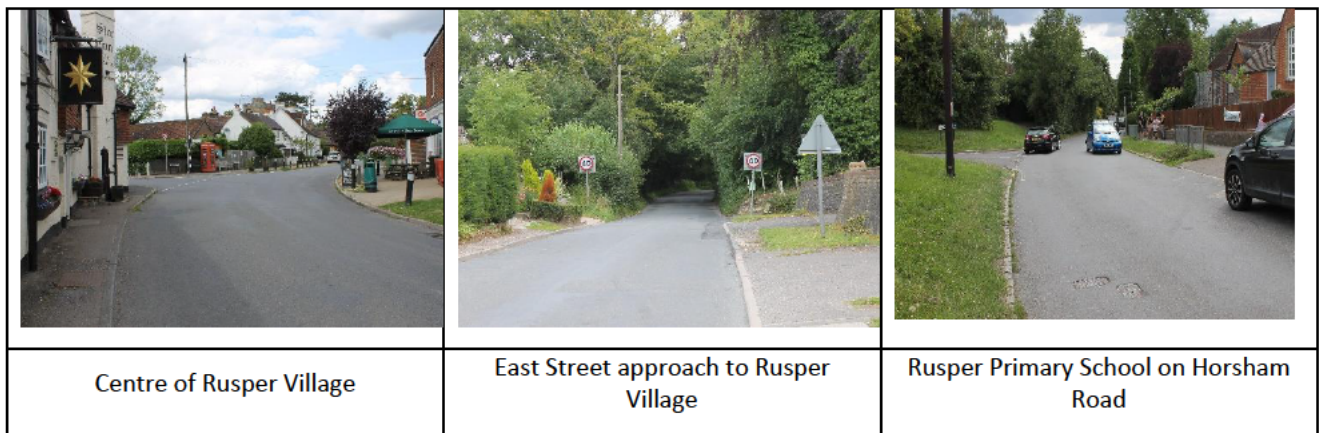
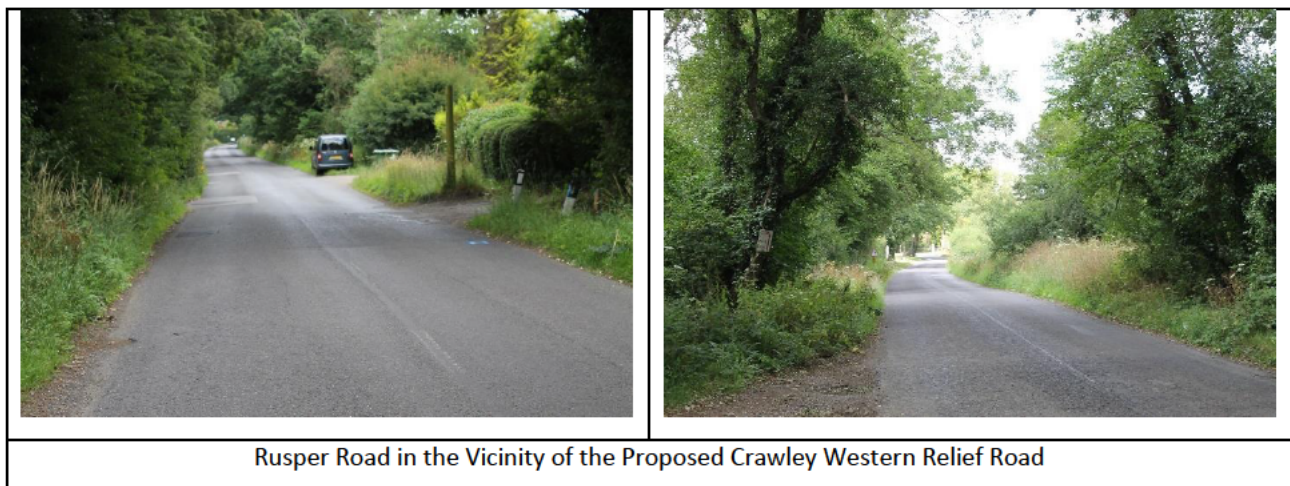


Figure 4.3: Rusper Road in the Vicinity of the Proposed Crawley Western Relief Road



Due to the congestion along the A264, Horsham Road and Crawley Avenue, motorists travelling between Horsham and Crawley/Gatwick Airport, and the M23, use the rural roads within PoR as rat runs. The rat running traffic is most noticeable along Horsham Road, East Street, Rusper Road, Ifield Wood and Charlwood Road during the peak hours, where speeding is also prevalent. Given the limited road width and alignment these roads are not suitable for rat running traffic and are particularly dangerous when confronting large vehicles, horses, pedestrians and cyclists. As illustrated in Figures 4.4 to 4.5.

Figure 4.4: Rural Roads in Rusper Parish

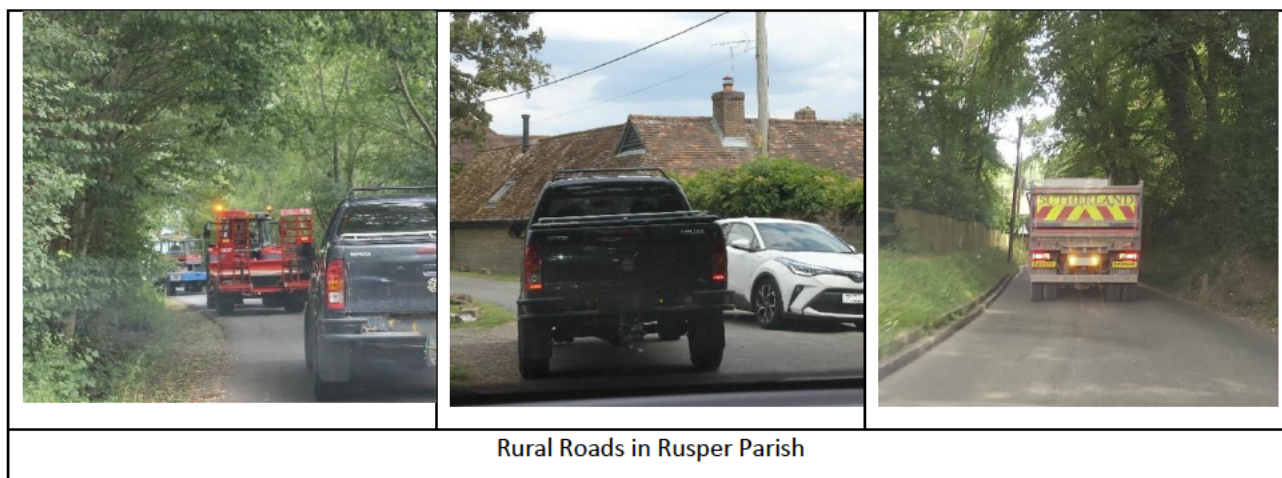
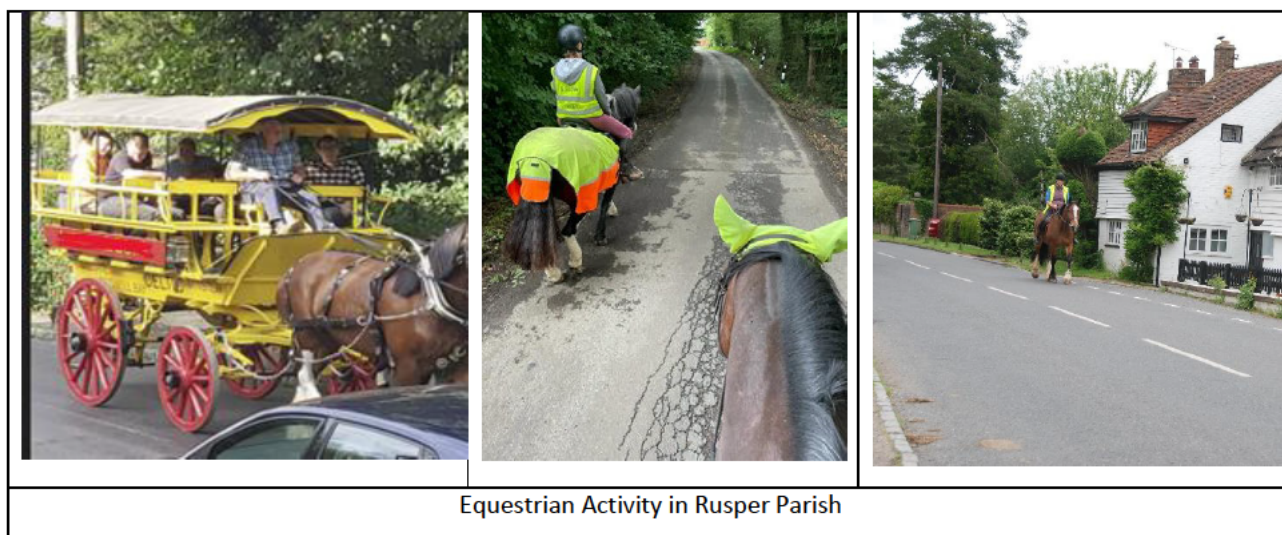


Figure 4.5: Equestrian Activity in Rusper Parish



Rusper village lies at the heart of the Parish with local facilities and a primary school. There is a 30mph speed limit in force through the village, however there is no street lighting in existence. At the entrance to the village from East Street the width is only 5 metres, whereby the width of Horsham Road outside Rusper Primary School is only 6 metres.

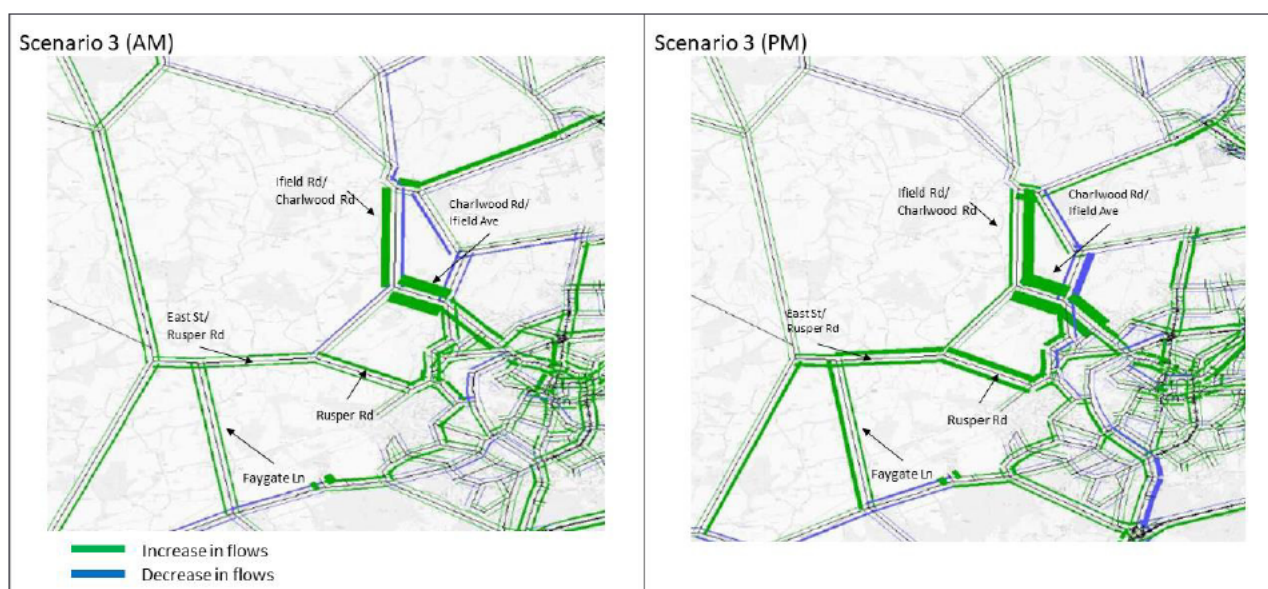
Regarding public transport within Rusper Parish, this is non-existent, as there are no rail stations situated within the Parish, with no daily bus services serving the Parish. The only exception being in the far northeast corner of the Parish where there is a bus route serving Charlwood.

4.3 Traffic Impact of the Wol 3k Site within the Parish of Rusper

It is difficult to determine the expected additional traffic flows expected on each of the local rural roads within the Parish of Rusper which surround the Wol 3k development from the information provided in the Crawley Transport Study and the Horsham Transport Study, as these have not been reported on in detail. However, it can be seen from the Saturn Model Flow Difference Plots provided (in Appendix K of the

Crawley Transport Model and Appendix H of the Crawley Transport Report) that substantial additional traffic flows are expected on the local road network after inclusion of the Wol 3k development trips, even with sustainable mitigation. Extracts of the flow difference plots from Appendix K of the Crawley Transport Study are shown in Figure 4.6 below. These plots show the difference in flows between the Reference Case and Scenario 3, which includes both the Wol 3k site and West of Kilnwood Vale developments.

Figure 4.6: Flow Difference Plot Extracts (Crawley Transport Study)



The flow difference plots show flow increases (in green) on all rural roads surrounding the Wol 3k development. Whilst these flow increases are not quantified in the reports or the plots, their bandwidth gives an indication of their comparative volumes. It can be seen from the plots that there are flow increases on all the surrounding rural low order roads, with the most significant increases seen on Ifield Road, Charlwood Avenue, Rusper Road and Ifield Avenue. It is not clear from these plots whether the first phase (middle section) of the CWRR has been included, however as mentioned earlier in this section, it has been stated in the relevant reports that this section of the CWRR has been included in both transport models.

Further, a sensitivity analysis test was undertaken as part of the Crawley Transport Study, which considered Scenario 3 (with the Wol 3k and West of Kilnwood Vale developments) with the CWRR in its entirety (from A264 to A23), against Scenario 3 without the CWRR. This test showed that the full CWRR would reduce the flows on the surrounding rural low order roads of Faygate Lane, East Street, Rusper Road, Ifield Road, Charlwood Road and Ifield Avenue, as expected.

It is clear from the above that the effect of the Wol 3k site will severely impact the local roads throughout the Parish of Rusper and that only the inclusion of the fully completed CWRR (A264 to A23) would reduce the impact of the Wol 3k traffic on the rural roads within the Parish. Without the inclusion of the full extent of the CWRR the resultant impacts of the Wol 3k site would be severe and contrary to both NPPF and the Horsham District Planning Framework Policies.

5. Horsham District Local Plan 2021 – 38: Regulation 19 Draft Copy Review

5.1 Introduction

This section of the Technical Note deals with the allocation of the Land West of Ifield site within the Regulation 19 Draft Horsham Local Plan and the policy relating to the site allocation process. The allocation of the Wol site was based upon Horsham District Local Plan Regulation 18 Consultation Document, which undertook an assessment process for allocating potential housing allocations in the Horsham District Local Plan. The section then goes on to review the Wol allocation by relating the assessment to the Document Review findings as set out in Section 3 and linking them to the relevant transport policies as set out in Section 2.

In creating the vision for the Horsham District Local Plan, the area will have become a place where opportunities for non-car-based transport including walking, cycling and community transport services are prioritised to help reduce the reliance on private vehicles and contribute to low carbon-based futures and healthy lifestyles. To achieve the vision objective no.6 relates to transport which will:

“Bring forward well designed development that is supported by the timely provision of necessary infrastructure, that promotes walking, cycling and public transport, provides accessible community services and open spaces that meet local and wider District requirements and contributes to healthy lifestyles.”

5.2 Land West of Ifield Strategic Site Allocation

Horsham District Local Plan 2021 – 38: Regulation 19 Draft Copy sets out at Chapter 11 (pages 139 – 144) the Strategic Site Allocations, whereby “Strategic Policy HA2: Land West of Ifield” describes the Policy site and then sets out Policy HA2.

As part of the site description at section 11.7 it states that:

“Within the overall area promoted for 10,000 homes a parcel of land known as Land West of Ifield, controlled by Homes England, is allocated for 3,250 homes. Although a stand-alone allocation, it is considered this allocation would have the potential to form part of any wider development of 10,000 homes should this be identified as part of a future Local Plan review.”

At section 11.15 the document goes on to review the transport evidence, whereby:

“Evidence from strategic transport modelling shows that to deliver the Land West of Ifield, significant mitigation will be necessary to mitigate the impacts on the local road network. The proposals include as a minimum the development of a partial link road to be delivered within the site. Its initial main purposes will be to provide the main vehicular access to the development, and to facilitate new bus, cycling and walking links through the site and integrating with the wider movement network. Delivery of the road must be delivered ‘up front’ within the first phase of the development, in order to ensure that the environment and amenities of existing or new local residents is not adversely affected.”

It is not clear if the “partial link road” is the CWRR as set out by Homes England, however it is clear that this transport infrastructure only applies to 3,250 dwellings (now 3,000 dwellings). It is interesting to note that at section 11.16 the documents elaborate further by stating that:

"It is anticipated that a full Crawley Western Link Road and multi-modal corridor will be required to mitigate the impact of wider traffic growth in and around Crawley in addition to the development of additional homes in this location (Wol)."

And goes on to state that:

"The full Link Road must connect the A264 at Faygate to the A23 south of Gatwick Airport, north of County Oak." And then mentions that "Contribution towards transport mitigation schemes on the A23 junctions may also be necessary."

The Strategic Policy HA2: Land West of Ifield is set out at Pages 141 to 144 of the Regulation 19 Draft Copy Review. In respect of transport, it sets out within the policy at point 2 that the development will be in accordance with a comprehensive masterplan to be agreed with the Council in the period to 2038 for 3,250 homes (now 3,000 homes). In addition, at 2. h) it mentions that:

"Comprehensive sustainable travel improvements, including the first phase of a link road to connect the A264 at Faygate to the A23 north of Crawley alongside high-quality bus service connections and sustainable travel options for first residents."

Finally point 8 of the policy states:

"A comprehensive transport strategy is submitted as part of the masterplan with development to include the following:

- a) A walking and cycling strategy that demonstrates how attractive, direct and legible routes that have priority over motorised traffic, and integrated with the existing and wider network will be delivered and maintained;*
- b) A link road with segregated Fastway bus lanes initially connecting Charlwood Road to the north with Rusper Road to the south (with southern access limited to public transport and emergency and non-motorised vehicles);*
- c) Extensions to the Crawley Fastway bus rapid transit network to enable fast connections to (as a minimum) Crawley Town Centre and Manor Royal Business District, and provide convenient bus access to key destinations within Horsham District; and*
- d) Demonstrate how electric vehicle use for private car travel and, as far as possible, for public transport are embedded in the strategy from the first phases of development.*
- e) A comprehensive Travel Plan and Construction Travel Plan to be agreed by the Council and Local Highway Authority is submitted, to cover the entire construction period, which demonstrate the long-term embedment of the transport strategy."*

5.3 Strategic Policy HA2: Land West of Ifield Review

Highway Constraints

From the work undertaken at Section 3 and 4, the results of the transport modelling undertaken by both Crawley and Horsham Councils clearly indicates that, even with generous trip reduction rates, the existing surrounding highway will be severely negatively impacted by the Wol 3k development if only the middle section of the WRCC is constructed. This is backed up by both the draft Horsham and Crawley Local Plans which point out that without the construction of a full Crawley Western Link Road between the A264 and A23 (North), traffic from any development to the west of Crawley, from permitted schemes and any future local plan proposals are likely to feed into residential roads in Ifield and/or Langley Green and onto the already congested A23 junctions.

Regarding other transport infrastructure upgrade proposals, as revealed in Sections 3 and 4, there is not enough evidence or detail to make an informed decision on the ability of the proposals to reduce impact of the traffic generated by the Phase 1 development on the surrounding highway network.

From the evidence it is clear that Homes England (the developer) envisages only constructing the middle section of the CWRR as part of WoI 3k site. However, without the completion of the complete CWRR that its omission will only seek to cause an unacceptable impact on the residual cumulative impacts on the road network which would be severe. **This position is contrary to Paragraph 111 of the National Planning Policy Framework.**

Public Transport

Section 3 and 4 highlights the fact that public transport provision within the district is poor, in particular Ifield station is located almost 2 km from the centre of the WoI 3k development and is considered beyond the acceptable maximum walking distance to access a railway station. Furthermore, the upgrades proposed for Ifield station only include cycle parking and a bus interchange; the limited train service of only 2 trains per hour in weekday peaks per direction is not proposed to change. There are no proposals to increase either train capacity or frequency, or even platform capacity.

The WoI 3k transport strategy appears to, at policy HA2 point 8 b) rely on the middle section of the CWRR to facilitate segregated Fastway bus lanes. Given its peripheral nature and that the end points at Charlwood Road and Rusper Road and the fact that they do not have segregated Fastway bus lanes, the mitigation impact would be very limited in promoting sustainable transport modes. Policy HA2 point 8 c) refers to extensions to the Crawley Fastway bus rapid transit network with fast connections from the WoI 3k development to key destinations within Horsham District. Unfortunately, the areas to the east and south of the WoI 3k development consist of residential areas with mainly residential roads, which are not conducive to being used as Bus Rapid Transit routes.

The comprehensive transport strategy, as set out in Policy HA2, whilst looking impressive, can only be regarded as extremely ambitious as it would be difficult to achieve the required permeability through the surrounding residential area and across Crawley Avenue. The WoI 3k development is surrounded by residential areas where transport infrastructure improvements will be restricted and would be difficult to achieve the required penetration of segregated Fastrack routes.

Cycling and walking

The evidence provided in section 3 shows that the existing walking catchments to the nearest bus stops and train stations nearest to the development, from anywhere within the proposed development except for the periphery, is substantially further than is considered reasonable to attract public transport users and consider the site sustainable. It is imperative therefore that the walking and cycling strategy clearly demonstrates how attractive they will be particularly to bus stops within the WoI 3k development. Clearly this will not apply to rail users as the walking distance from anywhere within the site is too great to attract walking trips.

Summary

It is evident that without the completion of the whole of the CWRR that its omission will only seek to cause an unacceptable impact on the residual cumulative impacts on the road network which would be severe.

The public transport provision proposed, appears to be delivered exclusively by segregated bus provision, with a heavy reliance on bus lanes and the Fastway bus rapid transit system. There is very little detail around how this reliance can be delivered and indeed how the bus will form the backbone of the shift from

the car to bus in order to obtain the necessary shift from the private car to more sustainable transport modes.

Due to the peripheral nature of the Wol 3k site, being wrapped around the western edge of Crawley, the distances to the major employment areas, town centre shops and facilities are over 2 miles away and are not conducive to attracting walking trips.

Overall, the Wol 3k development is situated in a remote and currently rural location on the far western edge of Crawley and there is a lack of robust evidence to indicate that routes, which are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development, can be realised. This standpoint is contrary to both NPPF and the Horsham District Planning Framework Policies.

6. Conclusions

In conclusion, and given its peripheral and rural location, the Wol 3k site can be considered unsustainable in transport terms and should the site be included in the Horsham Local Plan, it would only serve to promote the use of the private car.

On review of the transport aspects associated with Strategic Policy HA2 in the Horsham District Local Plan 2021 – 38: Regulation 19 Draft Copy can be considered as aspirational. **There is a distinct lack of any robust evidence that the Land West of Ifield does not have a severe impact on the surrounding highway network, or indeed can be delivered in a sustainable manner, and therefore if brought forward the site would be contrary to both the National Planning Policy Framework and current Local Plan Policies as set out in Section 2. As a consequence, Strategic Policy HA2: Land West of Ifield, should not be included within the Final Horsham District Local Plan 2021 – 38.**

It may well be the case that a new draft Local Plan could be forthcoming in 2023 following the election of a new Council administration. If so, then the Parish of Rusper reserves the right to provide further evidence to make clear any changes and potential resultant implications.

Issued by

Alan Bailes

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Approved by

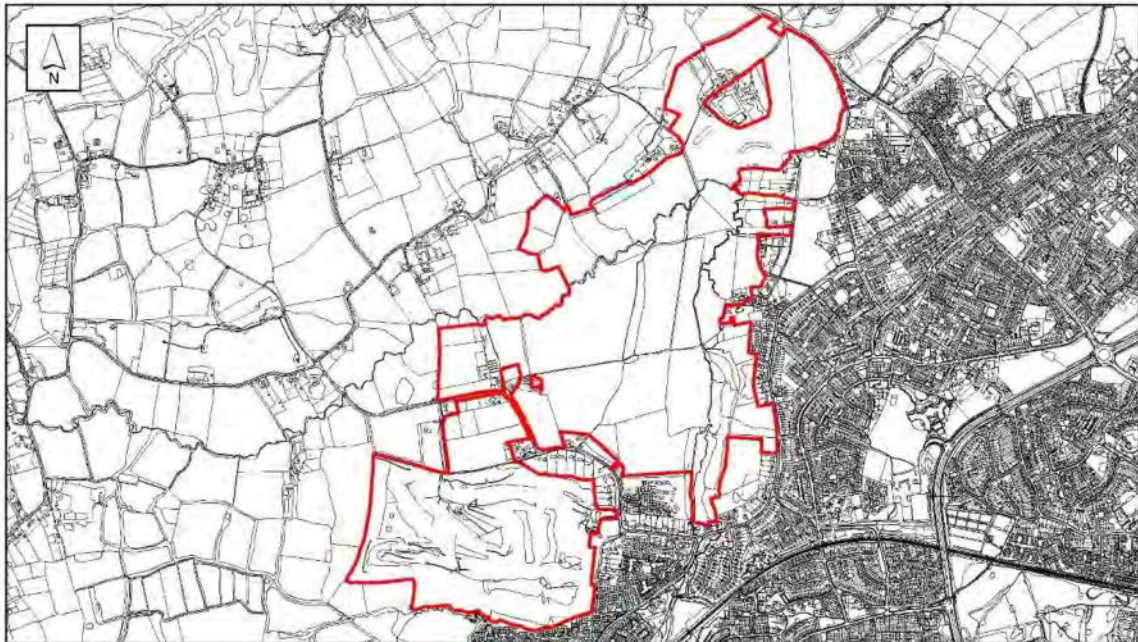
Alan Bailes – 7.08.2023

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Appendix A - Appendix 6 from the Regulation 18 consultation

Site Name: Land West of Ifield		SA101										
Site Map:												
<div></div> <div><div><div><div>Horsham District Council</div><div>Parkside, Chart Way, Horsham West Sussex RH12 1RL Barbara Childs : Director of Place</div><div>Reproduced by permission of Ordnance Survey map on behalf of HMSO. © Crown copyright and database rights (2020). Ordnance Survey Licence 100023866</div></div><div><div>Land West of Crawley</div><table><tr><td>Reference No :</td><td>Date : 28/09/2020</td><td>Scale : 1: 16,000 at A4</td></tr><tr><td>Drawing No :</td><td>Drawn :</td><td>Checked :</td></tr><tr><td></td><td></td><td>Revisions :</td></tr></table></div></div></div>				Reference No :	Date : 28/09/2020	Scale : 1: 16,000 at A4	Drawing No :	Drawn :	Checked :			Revisions :
Reference No :	Date : 28/09/2020	Scale : 1: 16,000 at A4										
Drawing No :	Drawn :	Checked :										
		Revisions :										
Site Area:		170 hectares										
Site Description:		<p>The site is being promoted by the Government Agency, Homes England. Most of the site comprises arable and pasture fields bounded by hedgerows and mature trees. Ifield Golf Club course, consisting of fairways and woodland, makes up around a third of the site. It is located in the southern section of the site.</p> <p>Some isolated mature trees are present within some of the fields. To the east, the site adjoins the neighbourhood of Ifield in Crawley, and Gatwick Airport is to the north, both of which are key urban influences in this area. Although adjacent to the busy road network, and close to the urban influences, the area is predominantly rural in character including areas of Ancient Woodland.</p>										
Summary of Proposal:		<p>The site is being promoted for 3,250 to 3,900 homes. The site promoter indicates that it could from a standalone extension to Crawley, but has been promoted as the first phase of a wider expansion of the town comprising 10,000 homes in total. The site promoters have identified an</p>										

	<p>'area of search' which sweeps in a broad arc around the western edge of Crawley from Faygate in the south west around to Crawley and Gatwick in the north east. Within the area of search Homes England considers that there is potential for up to 10,000 homes which could be delivered as three new neighbourhoods of Crawley.</p> <p><u>Land West of Ifield</u></p> <p><u>Housing</u></p> <p>The new community of between 3,250 and 3,900 homes. This would include a minimum of 35% affordable housing. A range of housing types and tenures would be provided to respond to local needs. Potential to deliver accommodation for 15 Gypsies and Traveller pitches has also been identified by this promoter with a specific land area identified to the Council through a recent call for Gypsy and Traveller sites.</p> <p><u>Employment</u></p> <p>The site promoter indicates that as part of the masterplan for a new neighbourhood, the development will deliver workspaces for start-up and intermediate businesses and land for employment which complements the existing offer at Gatwick Airport, and in both Crawley Borough and Horsham district. There is an intention to provide an enterprise/innovation centre as part of the 3,250 home scheme, however details of how this will be delivered, and its scale, have not to date been provided.</p> <p><u>Transport</u></p> <p>Homes England is proposing that the garden town is a '15-minute neighbourhood' whereby all day-to-day services and facilities are within a 15 minute walk or cycle ride for all residents. Proposals would also seek to ensure that there is access to high levels of public transport including an expansion of the Crawley fastway system. It is proposed that this element of the scheme would provide the first phase of a wider western link road from the A264 to the A23 in the north.</p> <p><u>Education and Community</u></p> <p>The proposals will deliver two new primary schools and would provide land for a secondary school, which will be delivered in the first phase of any build programme. Schools would provide for special educational needs (SEND), and</p>
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	<p>nursery / pre-school provision. A new community centre would be provided which would provide retail space and a community hall and pub/ restaurant. Open space and sports pitches would be provided</p> <p><u>Environment</u></p> <p>The proposed development area contains land which is designated for its importance for biodiversity and landscape including a Local Wildlife site (Ifield brook Meadows), SSSI and ancient woodland. This land is not proposed for built development. The site promoters have committed to a landscape led scheme that would deliver 10% biodiversity net gain. A target of 50% of the land being open space has been identified.</p> <p><u>Net Zero Carbon</u></p> <p>The site promoters state that the development would reduce its carbon footprint and would ensure homes are designed to be zero carbon ready to meet government climate change targets. Opportunities for on-site energy generation would also be provided.</p>
Site Assessment Summary & Recommendation	
<p>Allocation of this site would have benefits in bringing forward a significant level of residential accommodation that would help in meeting identified housing needs including a range of housing types and sizes. Evidence indicates that 35% affordable housing can be provided. The land West of Ifield is adjacent to the built up area of Crawley and benefits from close proximity to existing major employment hubs, and a number of higher order facilities and services at Crawley. It is considered that there is potential for development in this location to help meet some of Crawley's unmet housing needs.</p> <p>The site promoter indicates that the site would deliver a range of services and facilities to facilitate the creation of a new neighbourhood community in this location. This includes the provision of a new secondary school, which could again contribute to meeting existing educational needs in Crawley. Other facilities include retail, sports, open space and employment land.</p> <p>Overall, strategic development at this scale will have an impact on what is currently a generally rural landscape and there are areas where the landscape is sensitive to development. Any development will need to be designed to minimise adverse impacts as far as possible. Without mitigation, there is also potential for adverse biodiversity impacts, including ancient woodland and Ifield Brook Meadows Local Wildlife site. This land is not proposed for built development and the site promoter is committed to providing However it is recognised that the site promoter indicate that 10% biodiversity net gain.</p>	

The site is close to Gatwick Airport – this is beneficial in terms of economic links, but there is potential for new development to be adversely impacted by noise. The indicative masterplan shows that all noise sensitive development will be located to the south of the 60dB noise contour. The site is also close to the river Mole. It is noted that the emerging masterplan limits development to Flood Zone 1, and commits to delivering a comprehensive SuDs strategy. There is also limited capacity for foul drainage and it is anticipated that significant upgrades to sewerage infrastructure may be required.

Homes England has set out a vision for a '15 minute neighbourhood' and taking its lead from the Crawley Neighbourhoods concept. There is a strong commitment to walking, cycling and sustainable travel which builds on the site's proximity to the existing urban area. The site could be connected to existing public transport networks, in particular through expansion of the Crawley Fastway bus network. The site is also relatively close to Ifield railway station.

Roads in and around Crawley are known to experience congestion in the area of the proposed development, for example on the A264 corridor and routes into and through Crawley from the west. There is a need to ensure that any development which comes forward addresses the significant local concerns. The first phase of a link road is proposed as part of this scheme but the land ownership and scale of the scheme is insufficient to deliver the full relief road.

The scheme has been assessed as financially viable. The site is promoted by Homes England, who now own or controls 97% of the land. Homes England is the national agency for strategic housing delivery and has a good track record of creating successful new places. As a Government Agency it is also able to help secure infrastructure investment required to accelerate housing delivery. It is therefore considered there is potential to deliver 3,250 homes in the plan period.

Officer Recommendation: Taking account of the location of the site close to both Crawley and Horsham, this site is well located in terms of its ability to meet housing demand and meet unmet housing and educational needs for both towns. Homes England is the national agency for strategic housing delivery and there is potential to help secure infrastructure investment required to accelerate housing delivery. The site is therefore considered suitable for allocation. However, any scheme must be carefully designed to deliver high quality development that minimises landscape, biodiversity and other environmental impacts and takes account of its relationship on the edge of Crawley. The development will also need to deliver very high rates of sustainable travel and contribute towards the delivery of a wider Crawley relief road.

Appendix B - Allocations Strategic Policy HA2: Land West of Ifield

and any necessary transport mitigation. The design of development should consider the future direction of refuse collection and disposal. All developments will be expected to provide full-fibre, gigabit-capable broadband infrastructure.

9. Be designed to minimise the need to travel in the first instance and prioritise pedestrian and cycling opportunities. Development shall have a legible layout that facilitates other modes of sustainable transport and minimises reliance on the private car. It is expected that extensive provision for electric vehicle charging will be incorporated into the development.
10. Identify long-term management mechanisms and/or arrangements to ensure the long-term success of communities which are created.

Strategic Site Allocations

Strategic Policy HA2: Land West of Ifield

- 11.5 The settlement of Crawley directly adjoins the north eastern boundary of Horsham District. The town plays a key economic role within North West Sussex and is at the centre of the Gatwick Diamond with significant employment and a large range of services and facilities. The town has tight administrative boundaries and constraints including aircraft noise which has meant that in recent years that it has been unable to meet the full housing need for the town. The settlement has identified infrastructure issues, including education.
- 11.6 An area of land which sweeps in a broad arc around the western edge of Crawley, from Faygate in the south west to Gatwick in the North east has been promoted as having potential for up to 10,000 homes. It is suggested this area could be delivered as three new neighbourhoods of Crawley in the medium to longer term. At this stage, the longer term housing needs of Crawley are unknown, and would need to be considered within the wider context of the town. Furthermore, the deliverability of a 10,000 home scheme site in the period to 2038 cannot be demonstrated at this time. It will therefore be necessary to consider the need for and any future allocation of this wider parcel of land as part of a subsequent Local Plan review.
- 11.7 Within the overall area promoted for 10,000 homes a parcel of land known as Land West of Ifield, controlled by Homes England, is allocated for 3,250 homes. Although a stand-alone allocation, it is considered this allocation would have the potential to form part of any wider development of 10,000 homes should this be identified as part of a future Local Plan review.
- 11.8 Once completed, development in this location will form part of the wider urban form of Crawley. Whilst the starting point for any Local Plan is to meet the needs of the Local Authority Area, it is envisaged that development in this location will also assist in delivering unmet housing needs for Crawley. Therefore, any development which takes place in this location will require close and ongoing discussions with Crawley Borough Council. In addition to delivering housing (including self and custom build), there are

strong opportunities to support economic growth in the area and deliver education needs arising from Crawley. Development in this location will also need to ensure infrastructure impacts in and around the town are considered cumulatively, taking account of development within and around the town.

- 11.9 An Economic and Employment strategy is to be submitted and agreed by the Council, to demonstrate the phased delivery of an appropriate number and diversity of jobs to ensure a balance between population and jobs growth and promote economic growth and prosperity for local communities.
- 11.10 Crawley differs from the rural and market town character which dominates Horsham and West Sussex more generally. This is due to the population and economic profile of the town, alongside the borough's transport infrastructure, with two major rail stations situated on the Brighton-London main line, an established Bus Rapid Transit network (Fast-way network), and Gatwick Airport. As a result, a bespoke approach is required to deal with the cross-boundary issues including existing character, urban design and sustainable travel.
- 11.11 The Land West of Ifield is currently rural in character, although there are urban influences including Gatwick Airport, which is located some 2km to the north east as well as Crawley town itself. Although close to these urban influences, the rural character takes in areas of Ancient Woodland, a section of the River Mole, and Ifield Brook Meadows (a Local Wildlife Site). It also abuts the Ifield Conservation Area, including the Grade 1 Listed St Margaret's Church. Any development in this location must respect the rural and natural environment and local heritage and be brought forward in a sensitive way which generates net biodiversity gain and green infrastructure that is functionally linked to the surrounding environment. Development will also need to ensure access to the wider countryside for existing residents of Crawley is retained.
- 11.12 A neighbourhood centre is proposed as the heart of the new community for Land West of Ifield; this area will provide a mixture of higher density residential development (compared with the neighbourhood as a whole), retail, community facilities and civic public realm. The development will also deliver, in a timely manner, schools and education, sports and open space, and necessary sewerage upgrades.
- 11.13 1A comprehensive masterplan is being developed to ensure that issues such as flood risk, biodiversity net gain, carbon neutrality, air quality and noise impact are comprehensively addressed ahead of any development taking place. The masterplan will also ensure that the development is landscape-led, includes a Gypsy and Traveller residential site, and provides excellent green infrastructure and recreational links (including via public rights of way) to the wider countryside.
- 11.14 The site is of a scale which provides an opportunity to achieve a degree of self-containment, with many day-to-day journeys being made locally, but will from the very first phases, enjoy good quality bus, cycle and pedestrian links to key destinations outside the site, including Crawley town centre, Manor Royal business park, Ifield train stations, and Horsham Town. It will be important for the development to locate places

of work, shops and community facilities to maximise convenience of travel within the site. To promote sustainable and active travel modes, the scheme design will prioritise movement within the site by walking and cycling, with motor vehicles being required to give way to non-motorised traffic on most routes. Walking and cycling routes should seek to include off-road provision and 5km exercise circuits to help promote healthy lifestyles.

- 11.15 Evidence from strategic transport modelling shows that to deliver the Land West of Ifield, significant mitigation will be necessary to mitigate the impacts on the local road network. The proposals include as a minimum the development of a partial link road to be delivered within the site. Its initial main purposes will be to provide the main vehicular access to the development, and to facilitate new bus, cycling and walking links through the site and integrating with the wider movement network. Delivery of the road must be delivered 'up front' within the first phase of the development, in order to ensure that the environment and amenities of existing or new local residents is not adversely affected.
- 11.16 It is anticipated that a full Crawley Western Link Road and multi-modal corridor will be required to mitigate the impact of wider traffic growth in and around Crawley in addition to the development of additional homes in this location. Land is therefore safeguarded in the plan to allow for the delivery of such a road as soon as is practicable and deliverable. The full Link Road must connect the A264 at Faygate to the A23 south of Gatwick Airport, north of County Oak. An indicative safeguarded area of search for the full Link Road is shown on the Policies Map. Contribution towards transport mitigation schemes on the A23 junctions may also be necessary.

Strategic Policy HA2: Land West of Ifield

1. Land West of Ifield, as shown on the Policies Map, is allocated as comprehensive new neighbourhood to deliver the necessary infrastructure, services and facilities to meet the longer-term development of 3,250 homes.
2. Development will be in accordance with a comprehensive masterplan to be agreed with the Council which clearly shows the key elements of development, a comprehensive site-wide Design Code, and a clear phasing plan and will provide the following:
 - a) In the period to 2038, at least 3,250 homes (C2 and C3 Use Class), a minimum 35% of which will be affordable homes, together with the provision of a permanent Gypsy and Traveller site of 15 pitches.
 - b) A new Neighbourhood Centre to provide a community, employment and transport hub to include a library, community centre, and potentially café and/or public house and indoor sports facilities
 - c) Approximately 3,300 sqm of retail space to cater for day-to-day shopping and service needs delivered as part of the Neighbourhood Centre and/or secondary neighbourhood centre and a medium size food store.
 - d) Around 2.0 ha of employment floorspace to incorporate an enterprise and

- innovation centre, and to include:
- i. non-retail and restaurant E class employment uses (offices, research, professional services and light industrial),
 - ii. B2/B8 uses (general industry and warehouse/distribution
 - iii. provision for improved home working facilities and desk space units within the development.
- e) Land and contributions to meet the education provision standards advised by the Local Education Authority, (or any future updates) as follows:
- i. Two 2-form entry primary schools, to incorporate support centres for special educational needs (SEND);
 - ii. An 8-form entry secondary school, to incorporate support centres for special educational needs (SEND) and meet existing education needs in Crawley
 - iii. Two new full-day care nurseries; and
 - iv. An education, skills and innovation facility.
- f) Through liaison with the Clinical Commissioning Group (CCG) or any updated organisation with responsibility for health care provision, ensure that development facilitates, 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.
- g) Formal and informal open space, sport and recreation provision is provided to meet the needs of the new community in accordance with standards and the respective recommendations in the Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021. Informal open space provision shall include (but not be limited to):
- i. a network of nature paths throughout the development, integrating with existing public rights of way,
 - ii. accessible natural green space,
 - iii. 3G football pitches & MUGAs
- h) Comprehensive sustainable travel improvements, including the first phase of a link road to connect the A264 at Faygate to the A23 north of Crawley alongside high-quality bus service connections and sustainable travel options for first residents.
3. The development is landscape-led, to reflect the landscape and townscape context, and the pattern of development enhances identified landscape and heritage features with particular attention given to:
- a) Views from Hyde Hill to the south of the development along the River Mole valley;
 - b) Ensuring good access to the open countryside from Crawley's existing communities is maintained and public rights of way across the site connect their users with the landscape and retain some of their rural aspect
 - c) 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.

- d) Maintains the sense of settlement separation between Horsham and Crawley.
4. Proposals must provide a comprehensive Ecology and Green Infrastructure Strategy, incorporating a Biodiversity Gain Plan, to demonstrate how a minimum 10% net biodiversity gain will be achieved on the site, and in particular demonstrate:
 - a) that the Ifield Brook Meadows Local Wildlife Site is conserved and enhanced, ensuring an appropriate buffer;
 - b) that the Ancient Woodlands at Ifield Mill Stream, Hyde Hill, The Grove and Ifield Wood are protected and enhanced, ensuring an appropriate buffer;
 - c) the delivery of a biodiverse River Mole Linear Park, which protects and enhances the riparian ecosystems along the River Mole corridor;
 - d) that other ponds, watercourses, wetlands, ecologically important hedgerows and woodlands and veteran trees are in the first instance protected and enhanced in situ, or else impacts appropriately mitigated to ensure the protection of protected or vulnerable species.
 - e) ensure the retention and creation of wildlife corridors, and support delivery of the emerging Nature Recovery Network
 - f) the proposals do not have an adverse impact on operations at Gatwick Area through increased risk of bird strike, create building-induced turbulence or lighting that could pose a hazard to the safe operation of the airport aerodrome.
 5. An Air Quality Impact Assessment and comprehensive Air Quality Strategy is submitted to, and agreed by the Council, to demonstrate that any impacts on the Hazelwick Air Quality Management Area, and any impacts elsewhere, have been assessed and mitigated.
 6. A full noise impact assessment and mitigation strategy is submitted and agreed by the Council, which demonstrates that aircraft noise has been assessed and its impacts mitigated across the whole development. No residential or other noise sensitive uses are permitted anywhere on the site considered to be exposed to current or potential future aircraft noise level, which is above 60bB $L_{Aeq, 16hr}$;
 7. The masterplan and Sustainability Statement must demonstrate the delivery of net zero carbon, including demonstrating a fabric first approach to the construction of built development, and maximum use of onsite renewable energy technologies. This shall include a strategy to ensure that from 2025, all homes built on the site are designed as net-zero carbon through their expected lifetime.
 8. A comprehensive transport strategy is submitted as part of the masterplan with development to include the following:
 - a) A walking and cycling strategy that demonstrates how attractive, direct and legible routes that have priority over motorised traffic, and integrated with the existing and wider network will be delivered and maintained;
 - b) A link road with segregated Fastway bus lanes initially connecting Charlwood Road to the north with Rusper Road to the south (with southern access limited to public transport and emergency and non-motorised vehicles);
 - c) Extensions to the Crawley Fastway bus rapid transit network to enable fast