



Comment Submission to DC/23/1178 (Horsham Golf, Denne Park)

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Outline planning application with all matters reserved save for access for the development of a Sports and Leisure Hub including the provision of communal facilities, nursery, Golf College, sports club house (containing Health & Fitness spa, changing facilities and food & beverage) and an educational facility for Warren Clark Golfing Dreams (Use Classes E, F1 & F2); a local centre containing a convenience store and co-working space (Use Classes E & F2); the provision of supporting landscaping, open space and related infrastructure; outdoor sports and leisure provision comprising Driving Range, re-provision of golf (including supporting golf facilities) and hockey (including pitches and training area) (Use Class F2) all supported by the delivery of up to 800 homes (Use Class C3).

After consideration, Southwater Parish Council **OBJECT** to the proposed development.

The proposed development broadly conflicts with the numerous policies contained within the Southwater Neighbourhood Plan (SNP) and has failed to demonstrate compliance. In fact, the developer acknowledges in their submission that they do not comply with the SNP.

The development area has not been allocated for housing development within the SNP being beyond the Built Up Area Boundaries as defined by the SNP and neither has it been included as a site in the emerging Local Plan. Policy SNP2.2 allocates land west of Southwater for the delivery of 422-450 new residential units. The site was allocated in accordance with paragraph 73 of the NPPF as the most suitable and sustainable location for an appropriate amount of residential development that could be accommodated in the Parish, being within walking distance of a range of shops and services including Lintot Square. The proposed development would not be in as sustainable a location and would not be within walking distance services needed by future residents. This has been emphasised by Active Travel England who recommends that the application is refused based on the location of the site given the poor quality of the surrounding active travel infrastructure. The proposed development also greatly exceeds the quantum of development the Southwater community accepted through the Southwater Neighbourhood Plan, which allocated land for 422 - 450 new residential units at land west of Southwater. The proposal therefore conflicts with the development strategy set out in the adopted development plan, and in particular conflicts with SNP1 (SNP1.1(b)), SNP2, and HDPF Policy 15.

SNP1 requires development to positively contribute towards Southwater Village remaining a single centre settlement, with shops, services and facilities centralised in/around Lintot Square. Whilst the like for like replacement of the golf course may be acceptable, the provision of other facilities, most notably the mixed-use local centre (which includes a community facility and local shop) would conflict with SNP1.1(a).

The proposed development, by reason of the size and scale would have an urbanising influence in the countryside beyond Southwater resulting in harm to the countryside character of the area. This is emphasised by the fact that higher density development is constricted to the west of the A24 with no development of any significant density to the east. The high density of the development would be inappropriate for its countryside location. In addition, dwellings to the north of the Parish are typically

a maximum of two storeys in height, the proposed development seeks to provide units of up to 3 storeys close to Worthing Road and units of up to 2.5 storeys to the east within the more rural landscape which is clearly inappropriate and harmful to the character of the parish. As a result, the submitted LVIA concludes that there will be *'potential significant adverse effects during the construction process'* and would result in permanent adverse harm to 3 of the main viewpoints into the site contrary to Policy 25 of the Horsham District Planning Framework (HDPF) which seeks to support development that *'Protects, conserves and enhances the landscape'*. It is also contrary to Policy 26 of the HDPF which states that *'proposals must be of a scale appropriate to its countryside character and location'*. It also conflicts with Policy 27 of the HDPF which states that *'Development between settlements will be resisted'* unless it complies with 4 criteria including that *'There is no significant reduction in the openness and 'break' between settlements'* and *'It does not generate urbanising affects within the settlement gap, including artificial lighting, development along key road corridors, and traffic movements'*. It is clear that the proposal complies with none of these criteria and therefore conflicts with the policy.

Given the location of the proposed site to the northeast of Southwater, separated by the A24, would be a settlement in its own right and as such would not fit with the established pattern of Southwater or Horsham, adding pressure for further development and contributing to settlement coalescence between Horsham and Southwater. Therefore, conflicting with Policy SNP1.3 of the SNP which states that *'The unique and separate identities of Southwater Village. Christ's Hospital and Tower Hill will be maintained. To this end development must not individually or cumulatively result in the coalescence of these settlements with each other or Horsham Town'*. The whole development, especially one of such high density, would have a detrimental impact on the rural location and the landscape.

Whilst the applicant is proposing 35% of units as affordable in accordance with Policy 16 of the HDPF, the latest SHMA¹ states that for social/affordable rented properties, there should be a mix of 35% for 1-bed properties, 30% for 2-bed properties, 25% for 3-bed properties and 10% for 4+ bed properties. The submitted Affordable Housing Assessment demonstrates a considerable shortfall in 1-bed properties (22%), an overprovision of 3-bed properties (30%) and an overprovision of 4+ bed properties (15%). For affordable home ownership, the required mix is 25% for 1-bed properties, 40% for 2-bed properties, 25% for 3-bed properties and 10% for 4+ bed properties. The Affordable Housing Statement also demonstrates an overprovision of 3-bed properties (30%) and a shortfall in 4+ bed properties (15%). Policy 16 required HDC to assess *'the overall mix of affordable unit size and tenure, to ensure they meet local need as evidenced by the latest SHMA'*. In this case, the proposed development fails to achieve this.

The Parish Council also has significant concerns in relation to traffic safety and access to the site. Firstly, it is worth noting Southwater has the highest car ownership based on Census 2021 data with 92.4% of households having at least one car or van versus West Sussex where 84% have at least one car or van and 76.5% for England as a whole. With the addition of 800 units, two hockey pitches, increased sports and golf facilities with Horsham Football Club already established with a significant burden on the road network on match days, the Parish Council has considerable concerns in relation to the 2,000 additional cars the site will likely come forth with plus the additional vehicle movements generated from the increase to the sports facilities provision as documented by the applicant. The Parish Council also has further concerns in relation to the long term viability and sustainability over the applicant's reliance on citing the Park & Ride at Hop Oast as a viable solution to limit car use into Horsham when the Park & Ride has evidenced its capacity on Horsham FC match days having to utilise the RSPCA site for the overflow of cars which could soon be developed thus seeing the loss of use of the RSPCA site for overflow parking on match days. Notably, the access to the proposed development is via Worthing

¹ https://www.horsham.gov.uk/data/assets/pdf_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Assessment.pdf

Road which is also already at capacity with significant traffic at peak times, including from HGVs accessing the Oakhurst Business Park just south of the site. Further, the additional traffic, will present considerable risks to pedestrians and cyclists. In summary, the application does not demonstrate compliance with sustainable transport policies of the NPPF, HDPF or SNP.

Regarding arboriculture, the proposal makes no consideration for tree planting in line with SNP policy SNP18.1, or the planting of new trees in accordance with SNP Policy SNP18.3. These policies form part of the development plan and must not be ignored.

Regarding ecology, the Ecology and Biodiversity section of the Environmental Statement highlights that there will be an adverse impact on the St Leonard's Park Ponds SSSI, the St Leonard's Forest SSSI and the Slinfold Stream and Quarry SSSI as a result of a possible increase in visits by new residents. Paragraph 180(b) of the NPPF makes it clear that *'development on land within or outside of a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact...'*. Part of the reason that the maximum provision allocated in SNP is for 450 homes is to ensure that there is no significant adverse impact on the environment, including on nearby SSSIs. The provision of 800 new homes would have a far greater impact on the SSSI network and would conflict with paragraph 180 of the NPPF and also paragraph 11(d) which states that permission should not be granted unless *'the application of policies in this Framework that protects areas or assets of particular importance provides a clear reason for refusing the development proposed'*.

The LPA may be better placed to assess the water mitigation measures put forward in the application. However, the Parish Council has great concern over the long-term sustainability of the solution submitted inclusive of insufficient information on funding and securing the long-term maintenance of the complex system of water abstraction. The borehole supply is not a long-term solution for the duration of the existence of the development and the application requires further considerable water mitigation strategies. The Parish Council is also concerned about the impact of these boreholes on the Arun Upper Operational Catchment and resultant impacts downstream. The proposed development does not achieve water neutrality and therefore the development will negatively impact the Arun Valley Special Area Conservation (SAC), Arun Valley Special Protection Area (SPA), or the Arun Valley Ramsar Site.

It is clear that the proposed development ignores much of the Southwater Neighbourhood Plan, and the rest of the development plan, and that given the quantum of development proposed in a countryside location, the unsustainable location of the site (particularly compared with the allocated site in the SNP), the harm to the landscape, insufficient affordable housing mix, adverse impacts of traffic generation, and lack of a suitable strategy to achieve water neutrality, ensure that *'any adverse impacts of doing so [granting permission] would significantly and demonstrably outweigh the benefits'* contrary to paragraph 11 of the NPPF.

Consequently, the Parish Council respectfully request that Horsham District Council consider the contents of our response outlining the reasons for the Parish Council's objection when reviewing the application.

Kind regards,

Southwater Parish Council