PLANNING COMMITTEE REPORT

TO:	Planning Committee
BY:	Head of Development and Building Control
DATE:	16th September 2025
DEVELOPMENT:	Change of use of agricultural field to playing fields for football, including new access, car parking area with permeable surface and provision of compostable toilets.
SITE:	Land To The South of Two Mile Ash Road, Two Mile Ash, Horsham, West Sussex, RH13 0PG
WARD:	Southwater South and Shipley
APPLICATION:	DC/25/0638
APPLICANT:	**Name:** Mr James Sambrook **Address:** Southwater Sports Club, Church Lane, RH13 9BT

REASON FOR INCLUSION ON THE AGENDA: More than eight persons in different households have made written representations within the consultation period raising material planning considerations that are inconsistent with the recommendation of the Head of Development and Building Control.

RECOMMENDATION: To refuse planning permission

1. THE PURPOSE OF THIS REPORT

To consider the planning application.

DESCRIPTION OF THE SITE

1.1. This application relates to an agricultural field located immediately south of Two Mile Ash at the point it crosses the Downs Link. Two Mile Ash runs along the northern and western field boundaries, with Marlpost Road running alongside the eastern field boundary. The Bax Castle public house, a locally listed building, lies to the northeast of the field, on the opposite side of the Downslink. The Grade II listed Lawsons Farm sits to the southwest of the site on the opposite side of Two Mile Ash.

1.2. The site falls outside of the built-up area boundary for Southwater and other than being within an amber and red Great Crested Newt Impact Risk Zone is not subject to any environmental, ecological and/or heritage designations.

1.3. A line of trees are present along the northern and eastern field boundaries, with hedgerows along the southern and western field boundaries. The nearest dwellings are located in a small

cluster to the north of the field on the opposite side of Two Mile Ash Road and adjacent to the Bax Castle public house to the northeast.

1.4. The site falls within Flood Zone 1 and is not subject to surface water flood risk according to the latest EA mapping.

DESCRIPTION OF APPLICATION

1.5. The application seeks full planning permission for the following playing pitches and associated infrastructure.

- The change of use of agricultural land to five pitches of differing sizes to allow for different age groups.
- 55 parking spaces on a MOT Type 1 surface (crushed stones).
- A covered cycle store for up to 14 cycles.
- Security Gates.
- Tree planting.
- Two waterless composting toilets.

1.6. A new site access is to be located on Marlpost Road, breaking through the existing tree'd hedgerow and leading to the 55 bay car park and facilities. Biodiversity Net Gain (BNG) enhancements have been included on site. The proposal does not include floodlighting.

1.7. The Planning Statement states that matches will be held on Saturday and Sunday mornings, with midweek training in the summer months. These matches would be for the Club's under 18 age group only. The Transport Statement itemises the following weekday training schedule:
Monday: four teams
Tuesday: one team
Wednesday: seven teams
Thursday: four teams

1.8. The Planning Agent has clarified that *"Between the last Sunday in October to the last Sunday in March there will be 11 hours use per week. In summer when daylight hours, are at their peak, there will be a more hours playable in evenings and the total number of hours use of the site will increase to a maximum of 19 hours per week"*

1.9. Regarding the numbers of people at the site the Planning Statement confirms the maximum number of players at the site at any one time would be between 102-116, with potentially around 55 parents and officials. The agent has confirmed this figure includes all pitches being used and the presence of substitutes, parents and referees. The application states that provision has been made for children to be dropped off which the agent has confirmed is expected for the older children.

2. INTRODUCTION

STATUTORY BACKGROUND

2.1. The Town and Country Planning Act 1990.

RELEVANT PLANNING POLICIES

The following Policies are considered to be relevant to the assessment of this application:

National Planning Policy Framework

Horsham District Planning Framework (HDPF 2015):

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 4 - Strategic Policy: Settlement Expansion
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 34 - Cultural and Heritage Assets
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities
Policy 43 - Community Facilities, Leisure and Recreation

Southwater Neighbourhood Development Plan (2020):
SNP1- Core Principles
SNP15- Driving in the 21st Century
SNP16- Design

Horsham District Local Plan (2023-40) (Regulation 19):
Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 3: Settlement Expansion
Strategic Policy 6: Climate Change
Strategic Policy 7: Appropriate Energy Use
Strategic Policy 8: Sustainable Design and Construction
Strategic Policy 9: Water Neutrality
Strategic Policy 10: Flooding
Strategic Policy 11: Environmental Protection
Strategic Policy 12: Air Quality
Strategic Policy 13: The Natural Environment and Landscape Character
Strategic Policy 14: Countryside Protection
Strategic Policy 17: Green Infrastructure and Biodiversity
Policy 18: Local Green Space
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Policy 21: Heritage Assets and Managing Change within the Historic Environment
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Policy 28: Community Facilities, Leisure and Recreation
Strategic Policy HA3: Land North West of Southwater

Supplementary Planning Guidance:
Planning Obligations and Affordable Housing SPD (2017)
Community Infrastructure Levy (CIL) Charging Schedule (2017)

Parish Design Statement:
Southwater Parish Design Statement 2011- Supplementary Planning Document

Planning Advice Notes:
Facilitating Appropriate Development
Biodiversity and Green Infrastructure

PLANNING HISTORY AND RELEVANT APPLICATIONS
None

3. OUTCOME OF CONSULTATIONS

3.1. Where consultation responses have been summarised, it should be noted that officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk.

INTERNAL CONSULTATIONS

3.2. **HDC Arboricultural Officer:** Comment

[Summary] *Direct impact on trees/hedges is restricted to desire to remove a section of the historic boundary field hedgerow and associated field maples within it, to enable a new vehicle access to be constructed. Appropriate mitigation planting can be achieved via BNG/landscaping requirements for a scheme of this scale/type if acceptable in other respects.*

3.3. **HDC Conservation:** Comment

[Summary] '*To the east of the site is the Downs Link long distance path which is defined as a non designated heritage asset within the Southwater Neighbourhood Plan and also the Bax Castle Public House which is also recognised as a locally listed building. To the south west is the grade 2 listed property of Lawsons Farm.*

It is considered that the proposed pitches, associated paraphernalia and car parking will impact on the wider rural setting of the listed building, and this would cause negligible harm. The angular profiles and shiny, metallic finishes of vehicles are noticeably different to the softer, naturalistic shapes and more muted colours that are characteristic of the surrounding countryside. Individually and in accumulation, such vehicles would therefore appear as incongruous features in this largely rural setting. The proposal may also result in more activity and noise particularly during games and practice sessions which would be less expected in the countryside. This harm although negligible is still considered to constitute harm and this should be balanced against the public benefit of the scheme as per paragraph 215 of the NPPF.

With regards to the locally listed building of the Bax Castle it would be considered that there would be lesser harm due to the intervening topography, and vegetation, but there may be a level of disturbance through noise and activity.'

3.4. **HDC Leisure and Sport:** Comment

[Summary] *From a leisure perspective we are supportive of this application given the need for additional football pitches to support current demand and the forecast growth in football participation in and around the Southwater area.*

The design and access statement makes clear the urgency for the pitch in need terms. Southwater has two large and well-established football clubs, Southwater FC and Southwater Royals, both of whom are struggling to secure sufficient pitches for their need. Both clubs are now in a critical position in terms of need for additional pitches to meet existing and future

demand particularly with the recent large new housing provision in Southwater. Southwater has above national average number of students i.e. young people of 29% of the population (national average is 21%) highlighting the general need for sufficient facilities to meet demand. Southwater FC representatives have also flagged in conversation they are having to turn away significant interest for new players at all age levels on a weekly basis due to lack of capacity.

The long-term lease Southwater FC had at Southwater Playing Fields terminated at the end of May 2025 as the landowner has taken the land back for another purpose. The club has explored the option of purchasing the land, but it is unaffordable given the valuation. The club has been using these pitches since 1985 and this now leaves them seeking a home for 14 junior teams from U7 to U15 age cohorts, totalling over 250 junior players. This planning application for 5 pitches is a like for like replacement for the number and size of pitches that have been lost at Southwater Playing Fields.

Southwater Royals are planning for the new season having to reduce teams due to a lack of playing facilities, noting the recent refusal of the separate planning application for a 3G artificial pitch at The Ghyll in Southwater. It was highlighted through that planning process there is no suitable land for the development of new sports pitches within the current town boundaries of Southwater. It is therefore necessary to look slightly further into the nearby agricultural land to provide additional facilities as is being proposed with this application. Both clubs use various other sites for training and throughout the winter in Horsham and further afield, but it is clearly a significant logistical challenge and demand in Southwater is outstripping what capacity they can provide and is an unsustainable position.

There is a loss of agricultural land in this application but there are detailed plans for additional vegetation to the site to mitigate this. It is important for any new natural grass pitches to be properly constructed and maintained, as across the district pitches are regularly unplayable during winter due to poor initial construction, particularly with inadequate drainage systems. It is therefore recommended that any new natural grass pitches are constructed and maintained to the minimum standard as set out in the Football Association's Performance Quality Standard to ensure long term suitability for recreational and competitive football. Southwater FC's two grass pitches at Southwater Sports Club drain excellently with minimal matches lost to weather as they were constructed with the appropriate primary and secondary drainage, so a similar specification should be followed.

I have some doubts over the travel plans proposed in the application, as whilst this location is close to Southwater and the Downs Link I would expect most users to drive to this location, significantly increasing vehicle numbers on the nearby country roads. Marlpost road on which the site access point is proposed is high speed, unlit and not suitable for pedestrians. There are no pavements or footpaths to the site and deep verges and large hedgerows to either side of the road that limit visibility of road users. The Downs Link is also unlit so will not be an appealing option for most in winter months and the main access point from the footpath to Marlpost road is narrow, steep and provides limited sight lines down the road in both directions, which is a safety concern for those who do choose to use it. However, I wouldn't expect many to cycle to the site given these factors and from general experience of how people tend to travel to participate in football or other sports on a regular basis.

In the medium to longer term when further housing is constructed to the west of Southwater to-wards this location as per the Neighbourhood Plan the options to walk or cycle to the location will be more attractive to those new residents, notwithstanding the safety comments already raised, but this will be several years in the future. Any new development will bring population growth, further increasing the demand for local leisure facilities and we know football at all age levels will then be in even greater demand. The addition of further housing provision is also relevant as it will be built almost adjacent to the proposed pitches in this application, which will there-fore bring the pitches more into the Southwater community area than they currently appear to be.

3.5. **HDC Environmental Health:** Comment

[Summary] *Approve with conditions although concerns remain regarding the provision of toilets and hand washing. Sanitary provision is not directly a planning matter there are clear implications in respect of the provision of fixed structures at the site, preventing pollution and for water neutrality.*

Previous comments raised concerns relating to sanitation and toilet provision. Conditions have been recommended.

3.6. **HDC Landscape Architect:** Holding Objection/Advice

[Summary] *For avoidance of doubt, we wish to clarify that while a GLVIA 3 compliant LVA will inform and likely improve the proposed layout and mitigation measures, we remain unconvinced that the proposed location is suitable for the type of development proposed. We are of the judgement that mitigation measures alone are unlikely to successfully assimilate the proposed development and its associated use into the landscape, primarily due to the site's open nature and sensitive location within the countryside.*

The introduction of urbanising features to the open countryside location, as well as the removal of trees, is likely to have a significant adverse effect on the rural character of the local and wider landscape, contrary to HDPF Policy 25. Further, the proposed use is not essential to the countryside location, and it is disagreed that it can be considered 'quiet informal recreational use'. Our judgement is that the increase in overall level of activity in the countryside will detract from the tranquillity of the character of the area, also contrary to Policy 26 of the HDPF.

Previous comments have raised a holding objection/advice comment about the site.

[Summary] *The proposal and use are likely to result in adverse landscape character and visual effects and are not supported on landscape grounds. The introduction of urbanising features to the open, countryside location as well as the removal of trees is likely to have a significant adverse effect on the rural character of the local and wider landscape, contrary to HDPF Policy 25.*

The proposed use is not essential to the countryside location and the increase in overall level of activity in the countryside will detract from the tranquillity of the character of the area, contrary to Policy 26 of the HDPF. Further, while the proposal is of a low profile and lighting is currently absent, there are concerns with the potential for incremental changes in future, which may include floodlighting to accommodate longer hours of use during winter months, ball stop fencing, and all weather 3G/4G pitch proposals, all of which will be difficult to resist once the principle of development on site is established. These will further exacerbate the eroding effect on the rural qualities of the character area.

If these conclusions are disagreed with, taking into account Policy 10 of the HDPF, a Landscape and Visual Appraisal (LVA) is required prior to determination to fully assess the effects of the proposal on the landscape character and visual amenity, and importantly to consider measures to mitigate any identified effects.

OUTSIDE AGENCIES

3.7. **Ecology Consultant:** Comment

[Summary] *As the only recent ecology document submitted relates to BNG, we are not able to provide any revised comments yet. We are waiting for the Preliminary Ecological Appraisal (PEA) report but can advise on survey requirements for dormice and reptiles, if present.*

I attach our survey calendar for reference. If protected species are reasonably likely to be present AND affected by the development, surveys need to be undertaken. This is necessary to provide certainty of likely impacts prior to determination and that any mitigation measures are can secured either by a condition of any consent or a licence from Natural England.

If the presence of dormice is possible, a suitably licensed ecologist will therefore need to carry out a survey using a recommended method at an appropriate intensity within the survey window April to November (they hibernate over winter). This is set out in the Hazel Dormouse Conservation Handbook 3rd Ed. (2025). Depending on the survey method, the effort needed to meet the index of probability of finding dormice if present will vary.

If the presence of reptiles on site is possible, a suitably experienced ecologist should therefore undertake a presence/absence survey. This will require multiple visits to site on days with appropriate weather conditions. The survey window for reptiles is from March to October and surveys (they hibernate over winter).

Previous comment raised the need to provide a Preliminary Ecological Appraisal and other surveys if protected species are present.

3.8. **Environment Agency:** No Objection
[Summary] *We continue to have no objection to the proposal as submitted, but the Applicant should note our advice.*

Previous comment also confirmed the EA did not object to the proposal.

3.9. **Natural England:** Objection No Objection

[Summary] No objection - subject to appropriate mitigation being secured

3.10. **Naturespace:** Comment

[Summary] *There is a low risk that great crested newts (GCN) may be present at the application site. Horsham District Council considers it to be unreasonable to require the applicant to submit a survey because this could be considered disproportionate to the scale and the likely impacts of the development. However, the application site lies in the [add zone] impact zone as per the modelled district licence map, which indicates that there is highly suitable habitat for GCN within the area surrounding the application site. Therefore, anyone undertaking this development should be aware that GCN and their resting places are protected at all times by The Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Planning permission for development does not provide a defence against prosecution under this legislation or substitute the need to obtain a protected species licence if an offence is likely. If a GCN is discovered during site preparation, enabling or construction phases, then all works must stop until the advice of a professional/suitably qualified ecologist and Natural England is obtained, including the need for a licence.*

3.11. **WSCC Minerals and Waste:** No Objection

[Summary] *The supporting statement broadly concludes that the prior extraction of the safeguarded mineral resource (brick clay) would not be environmentally feasible or economically practicable at this location, owing to the proximity of the application site to nearby residential receptors and the relative abundance of the brick clay within the wider*

County. The statement further concludes that the overriding need for the development would outweigh the safeguarding of the mineral resource.

Although no substantive assessment of the potential underlying mineral resource or impacts of its extraction on neighbouring amenity have been undertaken, the MWPA notes the low priority of the extraction of the brick clay resource given its relative abundance within the county.

Therefore, we would offer no objection to proposed development, subject to the LPA being satisfied that it has been demonstrated that prior extraction would not be practicable or environmentally feasible and that there is an overriding need for the non-mineral development that outweighs the safeguarded resource.

Previous comment raised concerns about potential mineral sterilisation.

3.12. **WSCC Highways:** No Objection

Access Arrangements

The new access proposed is taken from Marlpost Road, which is subject to 60mph speed limit. The new access is 5.5 metres wide with 6.0 metres radii, suitable to accommodate two vehicles to pass on the access road. Automatic Traffic Counter (ATC) speed survey commissioned for a week in November 2024 recorded average 85th percentile speeds of northbound 42mph and southbound 37mph. In accordance with these recorded speeds, visibility splays of 114 metres and 91 metres are demonstrated on Drawing No. P3012/TS/3 within the TS.

An inspection of collision data provided to WSCC by Sussex Police from a period of the last 5 years reveals no reported incidents of personal injury accidents near to the proposed site access.

Parking and Internal Layout

WSCC Parking Guidance has no standard requirement set for football / playing fields. The scheme proposes 55 car parking spaces, which are of suitable dimension. A drop-off zone is also proposed adjacent to the car park entrance.

A cycle store comprising a total of 14 cycle spaces is provided to encourage sustainable travel.

Swept path diagrams P3012/TS/4 and P3012/TS/5 within the TS demonstrate that two cars can pass, and a delivery van can access and egress in forward gear, demonstrating the suitability of the access.

Sustainable Transport Accessibility

The nearest bus stops are in Southwater, and the nearest railway station is Christ's Hospital which provides wider area connectivity. However, due to the lack of pedestrian and cycle infrastructure near to the site the Highway Authority acknowledges that most of the journeys are made by car.

Travel Plan Statement

A travel plan statement is required to reduce the traffic impact of the proposals and to encourage sustainable travel such as car sharing, active travel etc.

Conclusion

The Highway Authority do not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network; therefore, is not contrary to the National Planning Policy Framework (NPPF), paragraphs 114 -117, as revised December 2024. Therefore, there are no transport grounds to resist this proposal subject to the inclusion of the following conditions and S106 contributions.

Conditions have been recommended if the proposal is recommended for approval.

3.13. **WSCC Lead Local Flood Authority:** No Objection

[Summary] *In this specific instance, we have no objection to this application, for the reasons outlined below:*

The application does not propose to add any significant impermeable surface area, as the field will remain grassed and the supporting parking area will utilise a permeable surface.

On initial review the application type and site location do not pose a significant flood risk, as no occupied buildings (residential or commercial) are proposed and there are no proposals to discharge surface water off site (other than existing greenfield runoff). However as previously advised, we would need to see further details of the permeable paving within the parking area and this should be included in any submission for discharge of condition.

Modelled surface water flood risk is limited to the boundary of the site, according to current Environment Agency modelling. We would advise that this is explored further as it may be that an unmapped Ordinary Watercourse intersects the proposed access location. If this is the case the Applicant should also review whether Ordinary Watercourse Consent is required, separate to any planning condition: Ordinary watercourse land drainage consent - West Sussex County Council

Previous comment raised concerns about a lack of information.

3.14. **Sussex Police:** Comment
[Summary] *Please be advised that I have reviewed the additional information as submitted within this planning application and have no further comments to make from a crime prevention perspective.*

Previous comments requested that a large degree of sensitivity is shown to residents to ensure that the local community are not unduly disturbed. Advice was also given for the cycle store bay and provision.

PUBLIC CONSULTATIONS

3.15. Representations:

57 letters of Objection have been received, from 36 addresses, objecting to the application on the following grounds:

- Highways access and parking.
- Detrimental to the rural character and landscape of the area.
- Loss of an agricultural field.
- Conflict with neighbourhood plan.
- Not in compliance with Policy 26.
- Development is not essential to the countryside location.
- Car park proposed will be too small and the calculations carried out are not correct.
- The site and accesses will flood.
- Noise.

- Overlooking.
- Impact on general amenity.
- Concerns about the proposals impact on ecology, habitats and the lack of BNG.
- The toilet provision is not substantial enough and there is potential for odour, overflow and cross-contamination.
- Further development will occur, including applications for floodlights.
- Increased traffic at the site.
- It would be unsafe to access the site from the Downs Link.
- There would be noise from generators.
- Dangerous for all road users including pedestrians, horse riders and cyclists.
- Water neutrality.
- Irrigation of hard clay required.
- Loss of hedgerows and trees.
- Tractors use the roads around Two Mile Ash.
- Unsustainable rural location.
- Not served by public transport.
- Not usable after school in the winter months as it would be too dark.
- No water supply would be unhygienic and unsuitable.
- No security the site will not be used outside of proposed times.
- Car emissions will damage the environment.
- Emergency vehicles will not be able to pass or get to the site.
- The number of people using the site is in direct contrast to the clubs website which states that 230 people use the site.
- No need for a new pitch.
- Lack of compliancy with basic public health expectations and the Equality Act through lack of disabled access, electricity, lighting or waste collection.
- Light pollution from floodlights/lighting.
- There has been no consultation with local residents.
- Conflicts with the NPPF.
- Health and safety concerns.
- A flood risk assessment and modelling has not been carried out.
- The site will not provide adequate facilities and will be unsafe.
- The proposal would result in a decrease in house prices.
- Increase in litter.
- Lack of consultation from the council.
- Loss of outlook.
- Hay bale urinals would be a fire hazard.
- Similarities between the refused development at Christ's Hospital and this site.
- An air quality management plan or other supporting information for sustainability have not been provided.
- Farmers should be supported.
- The proposal would set a precedent for further development.
- Walking distance given in the application is not accurate.
- References are made to the use of type 1 MOT surface as well as grasscrete.
- Spectators, officials, supporters and others have not been included in the calculations of those expected to attend the site.
- The applicant has issued a statement which suggests other community groups will use the site.
- Appropriate infrastructure has not been provided at the site.
- The Downs Link is not safe.
- The Transport Statement does not justify the access or visibility splay and swept path analysis does not address peak-time congestion or increased collision risks.
- The information does not show the proposal is the only practicable option.
- Increased anti-social behaviour.
- Two crashes have not been recorded on the road.
- FA guidance expects the provision of shelters.
- Running water is needed for first aid.

- Not all families have cars to access the site.
- Design.
- Loss of general amenity.
- Overdevelopment.
- Privacy, light and noise.
- Trees and landscaping.

3.16. 176 letters for Support have been received from 147 addresses, supporting the application on the following grounds:

- Increase in young families and therefore need for facilities.
- Lack of pitch provision, including the loss of the lease of existing playing pitches.
- Community benefit.
- Improved health both physical and mental when pitches are available and can be used something that is lost when pitches are unavailable.
- Requirements for new infrastructure.
- Football gives children good skills for life.
- Creation of a more accessible and diverse space.
- Provide educational opportunities and initiatives.
- Allow growth of the existing team.
- Sympathetic in design.
- Supports the health, happiness and outdoor enjoyment for local children.
- A thoughtful approach to sustainability and environmental impact.
- Query about the pitches being joined up with Southwater Royals FC, site access and that a MUGA pitch would be a better solution.
- Current farmland boundaries are respected.
- The new access will manage traffic safely.
- Fosters a sense of community.
- Improvements in biodiversity and trees at the site.
- Provides essential amenity.
- People can cycle and walk to the site via the Downs Link.
- Provide a safe environment for children to play sport.
- Use of agricultural fields for playing football is suitable.
- Does not remove other public space.
- Would prevent the closure of the existing club.
- Design.
- Highways access and parking.
- Privacy, lighting and noise.
- Trees and landscaping.

3.17. Two letters of representation have been received from two addresses neither supporting to nor objecting to the proposal on the following grounds:

- There is a lack of provision for parking spaces.
- Wildlife.
- Drainage.
- Litter.
- Calculations of those visiting the site.
- Likely to be future development.
- Inadequate toilet facilities.
- Inadequate infrastructure.

3.18. <u>Parish Comments</u>:

Southwater Parish Council: Objection
[Summary]

- The proposal conflicts with Policy SNP1 of the Southwater Neighbourhood Plan.
- The site is designated at landscape of Local Value with no capacity for development.
- The site is unsustainable and the car park indicates most people will access the site by car undermining the applicants claim the site is sustainable due to its proximity to the Downs Link.
- There is an absence of electric vehicle charging points.
- The proposal does not align with policies in the HDPF.
- The proposal would represent significant urbanising intrusion into a valued rural landscape.
- The potential for incremental development.

Previous comments objected to the application.

3.19. Member Comments:
None received

4. HOW THE PROPOSED COURSE OF ACTION WILL PROMOTE HUMAN RIGHTS

4.1. The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.

4.2. The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010.

4.3. It is noted concerns have been raised in representations about the lack of disabled access however the site is flat whilst the car park is located close to the pitches such that disabled persons would not be prejudiced from viewing matches. The proposal is not therefore anticipated to have any potential impact from an equality perspective.

5. HOW THE PROPOSAL WILL HELP TO REDUCE CRIME AND DISORDER

5.1 It is not considered that the development would be likely to have any significant impact on crime and disorder.

6. PLANNING ASSESSMENTS

6.1. The main considerations material to this application relate to:

- The principle of development, including need;
- The effects of development upon local character and appearance;
- The effects of development upon neighbouring occupiers and users of land;
- Sustainable access.

Background to the Application

6.2. The Planning, Design and Access Statement explains that Southwater Football Club (SFC) provides football training for the community of Southwater. Prior to September 2025 the

clubs youth teams trained at Southwater Playing Fields (Phillips Field) which is located to the east side of the A24, accessed via Southwater Street/Coldstaple Lane. In January 2021 the club was given notice to vacate the land and since this date the Club has sought to find a new site. The submitted information confirms they have been in discussions with Southwater Parish Council and Sussex FA about finding alternative sites and raising funds to purchase land, but with no success. The applicants state that this application site is the only site that has become available in the last 6 years, and its change of use would benefit hundreds of local children and families and help meet ongoing demand, including for girls football. The Statement explains that the Club need to secure this site as a matter of urgency otherwise it will have to close, meaning hundreds of children will be affected and games cancelled from September 2026. It has since been confirmed that facilities have been secured until September 2026.

Principle of Development

6.3. The Statutory basis for decision taking in planning is Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance, the Development Plan comprises the Horsham District Planning Framework (HDPF- 2015) and the Southwater Neighbourhood Plan (SNP- 2021).

6.4. Policy 2 of the HDPF sets out the main growth strategy for the district, focusing development in and around the main district settlements. Policy 3 of the HDPF directs development within existing settlements which have defined built-up area boundaries (BUAB). Policy 4 of the HDPF states that development will be permitted outside BUABs via the planned expansion of settlements where, amongst other criteria, a site has been allocated in a local plan or neighbourhood plan.

6.5. Outside of BUABs, Policy 26 protects the countryside against inappropriate development unless it is considered essential to its countryside location and meets one of four specified criteria: (1) supporting the needs of agriculture or forestry; (2) enabling the extraction of minerals or the disposal of waste; (3) providing for quiet informal recreational use; or (4) enabling the sustainable development of rural areas. In addition, Policy 26 requires that such development is of a scale appropriate to its countryside character and location and does not lead to a significant increase in the overall level of activity in the countryside and protects and/or conserves the key features and characteristics of the landscape character in which it is located.

6.6. Policy SNP1.1 of the Southwater Neighbourhood Plan (SNP) requires that development proposals make a positive contribution towards the Core Principles in the Plan. Policy SNP1.1 itemises these core policies, of which the most relevant for this application are:

b) Settlements within the Plan Area will only grow beyond their Built-Up Area Boundaries (as defined by this Neighbourhood Plan and shown on the Policies Map) in accordance with policies contained in the Development Plan.
c) All development should take into account existing and proposed facilities, infrastructure and resources to ensure a coordinated approach to future development.
d) Infrastructure must be provided that meets the existing and future needs of the community.
f) All development must contribute to sustainable development and in particular it should enhance our strong, healthy and vibrant community.
g) Leisure and sporting facilities should continue to be maintained and enhanced where possible.

6.7. The application site forms an agricultural field located outside of the built-up area boundary of Southwater on a site not allocated for development. Further, the Southwater

Neighbourhood Plan does not allocate the site as local green space, local community space nor as a formal/informal sport area under Policies SNP5, SNP6 and SNP7. The proposal does not therefore comply with Policies 2 and 4 of the HDPF, nor Policy SNP1.1 of the SNP.

6.8. While the above policies are not supportive of the proposal location, the proposal seeks to provide football pitches which are considered to be a community use. At the district level, **Policy 43** of the HDPF relates to Community Facilities, Leisure and Recreation and states that:

'*The provision of new or improved community facilities or services will be supported, particularly where they meet the identified needs of local communities as indicated in the current Sport, Open Space and Recreation Study and other relevant studies, or contribute to the provision of Green Infrastructure. In addition to supporting facilities or services located in accordance with the Development Hierarchy and Strategic Development locations, sites located outside built-up areas will be supported <u>where this is the only practicable option and where a suitable site well related to an existing settlement exists</u>*.' [emphasis added]

6.9. At the national level, **Paragraph 96 (c)** of the NPPF states that:

'*Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*'

6.10. Paragraph 98 of the NPPF then states that:

'*To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs….'

6.11. Further, **Paragraph 103** of the NPPF states that:

'*Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate*.'

6.12. National policies are clear that sport and physical activity are important considerations for this application and that such provisions should be planned for positively. HDPF Policy 43 is considered to be consistent with these national policies in that it supports the delivery of sports facilities to meet identified needs. However, Policy 43 qualifies this support by stating that such facilities will be supported where this is *'the only practicable option and where a suitable site well related to an existing settlement exists'.* Whether the proposals accord with these requirements, and those of Policy 26, is explored in the sections below.

<u>Need</u>

6.13. The proposal has been accompanied by information setting out the need for the proposed pitches whilst a number of representations have also been received supporting the need for these pitches. Principally, the agent has confirmed that the pitches are required to serve the applicants Southwater Football Club as the club has had to vacate their current pitches at Phillips Field (east of the A24) and have only managed to arrange temporary pitches for the first half of this year's season. As such, the club is now homeless and is unable to provide the facilities to meet its demand. The proposal therefore seeks to replicate the five variously sized pitches at Phillips Field to serve the different age groups at the club.

6.14. The submitted information states that there are restrictions on the size of the pitches based on the age group of a team and the number of teams that can share a pitch, with a maximum number of matches that can be played on a Saturday morning. This provides justification as to the number of pitches required and therefore why a smaller number of pitches drawing lines for different age groups on the same pitch would not be suitable.

6.15. Information has been submitted alongside the application which demonstrates that the applicant has contacted schools and other sports facilities in Horsham seeking use of their pitches. This included Christ's Hospital, The Ghyll, The Bridge and 28 primary and secondary schools. Officers have reviewed this information and are assured that the breadth of the search has been suitable. While some sites were able to offer availability none were able to offer full availability or replicate the capacity of Phillips Playing Field.

6.16. Within the Planning, Design and Access Statement information has also been given on the applicants search for acquiring other appropriate sites. The agent has confirmed the evidence for land sales has been collated from July 2024 to the date of this submission. Setting a three-mile radius from Southwater using Rightmove the applicants have found that out of 17 of the results, 88% of the sites are too small (the applicant requires 8 acres), or have inappropriate terrane or gradient. The applicant has also referred to the benefit of the land in this instance being offered at a low long-term lease.

6.17. HDC's Pitch Playing Strategy (2019) document sets out that within the Southwater sub-area adult and mini 7v7 pitches are running under capacity and into the future. Youth 11v11, Youth 9v9 and Mini 5v5 pitches are though expected to be operating over-capacity by 4.5 to 5.5 match equivalents per week by 2031. These calculations were made prior to the cessation of use of the Phillips Playing Fields.

6.18. Based on the current understanding of capacity and demand in Southwater, HDC's Leisure and Sport Team has confirmed that there is a significant logistical challenge and demand in Southwater, outstripping what capacity can be provided and that the current position is unsustainable. The team has also made reference to the future and the increased demand for football at all age levels that will be required following further development in Southwater.

6.19. When looking at Southwater in conjunction with the submitted information it is clear that there is no room to develop/expand existing pitches in the village further within the built-up area boundary (noting the recent refusal of planning permission to replace the grass pitch at The Ghyll leisure centre with an all-weather 3G pitch). At the current time the Phillips Field pitches remain, however it is understood the owner may be looking for alternative use for the land. No planning permission exists for an alternative use, whilst Policy SNP7 protects Phillips Field as a designated Formal/Informal Sports Area. Importantly, Policy SNP7.2 resists development on Formal/Informal Sports Area unless an assessment has been undertaken which has clearly shown the land is surplus to requirements; or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision. This policy requirement broadly replicates Paragraph 104 of the NPPF. It is therefore difficult to foresee alternative development on Phillips Field being permitted given the demand and capacity issues in the

area. Regardless, it appears from the submission that the owner does not wish to continue permitting use of Phillips Playing Field.

6.20. It is therefore considered that the applicant has demonstrated that providing new pitches outside the built-up area boundary of Southwater is the only practicable option, as required by Policy 43, and that there is a need for these additional pitches. Whether the site is well-related to Southwater to satisfy the other key requirement of Policy 43, and is acceptable in all other respects, is addressed separately below.

Landscape Character and Impact

6.21. As existing the site is used for agriculture and appears to be accessed for farming activities through the gate in the southeast corner leading onto the field from the south. The site is broadly characteristic of the area and has been found to be of moderate to high value by the Land Capacity Assessment (2014). Within its immediate context the site retains its predominantly rural and agricultural qualities, on account of the undeveloped fields and agricultural features, including the presence of farm buildings to the southwest. A few dwellings can be found to the north of the field, notably including the locally listed Bax Castle. While these dwellings introduce some urbanising features, they are characteristic of rural houses set within large grounds. Due to the intervening layers of mature vegetation and, in the case of Bax Castle, the influence of local topography, these features are not perceived as significant intrusions on the countryside setting.

6.22. The site's eastern boundary is defined by a mature treeline that extends further south alongside Marlpost Road, significantly contributing to the rural character of the area. An additional, although less dense, tree line can be found along the northeastern boundary.

6.23. The Landscape Officer states in their comments that the wider character of the site shares the same characteristics as the immediate context described above, comprising a well-defined field pattern, traditional agricultural features and scattered farm buildings. They also state the setting is punctuated by parcels of Ancient Woodland, including Courtland Wood, which can be found to the north-east. Their comment also confirms urbanising influences are minor, limited primarily to the few dwellings previously noted.

6.24. Multiple Public Rights of Way (PRoW) are located in the surrounding area, providing access and enjoyment of the countryside. Predominantly views of the site from this network are limited; however, it is expected mid to long distance views of the site (including its entrance) would be possible from PRoW 1655, set to the south east of the site.

6.25. The built up area boundary (BUAB) of Southwater is located some 250m directly east of the site, on the opposite side of the Downs Link. This boundary reflects the Policy SNP2.2 allocation within the SNP for some 422-450 homes west of Southwater, with the allocation site also now forming part of the wider Strategic Policy HA3 'Land North West of Southwater' allocation in the draft Horsham District Local Plan. No planning permission yet exists for development on this site, therefore as it currently stands the urban edge of Southwater is some 820m to the east of the application site.

6.26. In any event, even were development to extend to the current BUAB in accordance with the site allocation policy, there would be no appreciable visual relationship between the current application site and the new development given the intervening barrier of the Downs Link and associated trees. The application site would not be read as having a close physical or visual relationship with Southwater and would instead retain its current rural character and context.

<u>Landscape Assessment</u>

6.27. Policies 25, 32 and 33 of the HDPF promote development that is of a high-quality design, which is sympathetic to the character and distinctiveness of the site and surroundings. The landscape character of the area should be protected, conserved and enhanced, with proposals contributing to a sense of place through appropriate scale, massing and appearance.

6.28. As already set out above, Policy 26 to the HDPF requires that development must be of a scale appropriate to its countryside character and location and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located. Development must also not lead to a significant increase in the overall level of activity in the countryside.

6.29. Policy SNP16 expects development to be or high-quality design. The policy goes on to mention the need for a safe development, the avoidance of clutter and the development of safe and secure sites.

6.30. Paragraph 135 of the NPPF states that planning decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible. Paragraph 139 of the NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area.

6.31. To recap the proposal, five pitches at various orientations are proposed within the central area of the site. To the east composting toilet blocks, refuse areas and an area of MOT Type 1 surfacing for the parking of 55 cars is proposed. Further to the east at the site boundary lies the proposed site access onto Marlpost Road. The road is a narrow, verdant road characterised by a dense tree line. To facilitate the new access, the removal of four trees and an additional 2m canopy clearance is proposed.

6.32. The applicant has not submitted a Landscape and Visual Impact Assessment such as to enable a full understanding of the likely impacts of the development upon significant views and local landscape character. Nevertheless, both planning officers and landscape officers have visited the site and have been able to reach a judgement as to the likely impacts.

6.33. As existing, the field has an open character with vegetation limited to the field boundaries only. It is surrounded to the northwest, south and east by a patchwork of other open fields with the land either side to the north punctuated by a small number of sporadic dwellings set within a semi-wooded setting. It is apparent there are expansive views into the site and towards the South Downs, along with mid to long distance views of the site (including its entrance) possible from PRoW 1655 which extends towards Southwater from the southeast corner of the site. Whilst Two Mile Ash and Marlpost Road pass by three sides of the site, these roads are lightly trafficked such that the site and its surrounds have a quiet and rural character. Those travelling along Marlpost Road and Two Mile Ash, while experiencing the site in a transient nature, would nevertheless experience it within a clearly rural context. The intervening fields and woodland means that Southwater and its urbanising influences, cannot be seen or heard from the site.

6.34. The introduction of five formalised pitches together with the car park bin store and toilet bock, whilst clearly all of a low level, would nevertheless change and formalise/urbanise the character of this field and be readily visible from the adjacent roads and public rights of way. Whilst approximately 60% of the field would be left as either amenity grassland or as planted

meadow, the change to the character of the field would still be clear. This impact would be compounded by the loss of trees and vegetation to create the access point and the formalisation of a two way vehicular entrance with security gates. The removal of these trees and vegetation, which contribute to a mature treeline and green corridor, would result in the partial loss and weakening of this established landscape feature.

6.35. The application is supported by detailed soft landscaping plan which proposes the introduction of tree and hedgerow planting around the car park and toilet/refuse area, and the planting of trees at various points around the site's northern perimeter, in part to compensate for the loss of the trees and vegetation at the site entrance and mitigate some of the development impacts. The planting of trees elsewhere on the site would not though remove the uncharacteristic site access opening within the mature hedgerow fronting Marlpost Road. It is understood from the submitted documents that other options for the access were explored and that the proposal in its current state removes the lowest quality trees however whilst the trees may be considered low quality, it is not considered that the new planting would eliminate or adequately compensate for character harm arising from the scale of clearance expected.

6.36. In addition to the above impacts on the appearance of the site are the impacts from the increased activity at the site. The application sets out that the site will be used between 11 and 19 hours a week, depending on the season, with there being some 116 players (plus around 55 parents and officials) on site at any one time when all pitches are in use, with multiple matches at weekends meaning there will be a crossover between persons arriving and leaving the site, the vast majority by car.

6.37. Whilst the use of the site at this intensity would not be constant, the impact from the increased vehicular traffic and noise produced by the site's use (car engines, shouting and whistles) would be at odds with the otherwise tranquil rural character of the area. This would include impacts from vehicles using the surrounding country roads to access the site from Southwater and other settlements in the area. Allied with the visual impact of the proposal, this increased noise and activity is such that the overall impact would be significant and harmful.

6.38. Overall, therefore, it is concluded that the proposal will result in significant visual harm to the landscape character of the area through the introduction of formal pitches and associated infrastructure, and the site access. The proposal would clearly formalise and urbanise the site changing its nature to the detriment of the surrounding rural landscape character. Its use would appreciably, even with a limitation on hours, alter the nature of the site and surrounds, significantly increasing vehicular trips to and from the site and creating noise through the pitches use and vehicle comings and goings. These all fall out of line with policy expectations which seek to preserve tranquil countryside settings.

6.39. The anticipated levels of traffic, activity, and noise produced from the site would be significantly out of character in this tranquil rural setting from a use that cannot be said to comprise informal recreation as would be allowed under Policy 26. The proposal, therefore, is considered contrary to the requirements of HDPF policies 25, 26, 32 and 33.

Heritage:

6.40. To the southwest of the site is the grade II listed property of Lawsons Farm, whilst to the east of the site is the Downs Link long distance path (former rail line) which is defined as a non-designated heritage asset within Policy 19 of the Southwater Neighbourhood Plan, and also the Bax Castle Public House which is also recognised as a locally listed building.

6.41. Policy 34 of the Horsham District Planning Framework states that development should be reinforce the special character of the historic environment through appropriate siting, scale,

form and design; and should make a positive contribution to the character and distinctiveness of the area. Proposals should preserve and ensure clear legibility of locally distinctive vernacular building forms and their settings, features, fabric and materials. S.66 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on decision makers to have special regard to preserving the listed building or its setting. This statutory duty is reflected in the requirements of Chapter 16 of the NPPF which, amongst other provisions, requires that great weight be given to the conservation of a designated heritage asset (para 212) and any 'less than substantial' harm should be weighed against the public benefits of the proposal (para 215).

6.42. The Council's Heritage Officer has identified that the proposed pitches, associated paraphernalia and car parking will impact on the wider rural setting of the listed building of Lawsons Farm, noting that the angular profiles and shiny, metallic finishes of vehicles are noticeably different to the softer, naturalistic shapes and more muted colours that are characteristic of the surrounding countryside. Individually and in accumulation, such vehicles would appear as incongruous features in this largely rural setting, whilst the proposal may also result in more activity and noise particularly during games and practice sessions which would be less expected in the countryside. As a result, the Heritage Officer has confirmed that the proposal would cause some harm, albeit negligible, to the setting of the listed building. Given the clear community and health benefits of the proposal, it is considered that these public benefits outweigh the negligible harm identified, thereby satisfying the requirements of paragraph 215 of the NPPF.

6.43. In terms of the non-designated heritage assets of Bax Castle and the Downs Link, Policy SNP19 states that "*Development proposals will be supported where they protect and, where possible, enhance Parish Heritage Assets as identified on the Neighbourhood Plan Policies Map"*. SNP19.2 goes on to state further *"All proposals that directly impact Parish Heritage Assets, or the setting thereof, must describe the impact of the development on the significance of the heritage asset, demonstrating that the significance of that asset will not be adversely impacted".*

6.44. At a national level, paragraph 216 of the NPPF states that when considering the effect of an application on the significance of a non-designated heritage asset, "*a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*".

6.45. The Council's Heritage Officer has identified that there would be lesser harm to Bax Castle due to the intervening topography, and vegetation, but there may be a level of disturbance through noise and activity. Similar impacts would occur to the Downs Link. Overall, taking the balanced approach required by paragraph 216 of the NPPF, it is considered that the public health and community benefits of the proposal outweigh the very minor harm identified.

Residential Amenity

6.46. Policy 32 of the HDPF states that development will be expected to provide an attractive, functional, accessible, safe, and adaptable environment that contribute a sense of place both in the buildings and spaces themselves. Policy 33 continues that development shall be required to ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land. Policy SNP16 (Design) requires that development results in no unacceptable impacts on residential amenity.

6.47. The proposal would be well contained within the field some distance (in excess of 60m) from the nearest properties. The existing field boundaries and distance to the existing dwellings prevent the proposal from resulting in unacceptable impacts on neighbouring amenity, in particular outlook and privacy.

6.48. Concerns have been raised in representations about the erection of floodlighting however floodlighting is not proposed as part of this application and would require instead a separate application for planning permission in the event this application is approved.

6.49. Regarding noise and parking at the site the Environmental Health Officer has recommended a condition for an operational management plan to help minimise any amenity impacts. Again, given the distances to the nearest properties, any impact from whistles, shouts or car movements would not be unduly intrusive to residents

6.50. Through a combination of the distances of the proposal to the nearest dwellings and conditions that would be secured were the proposal considered acceptable it is not expected the impact on neighbouring amenity would be unacceptable. Given this it is not considered the proposal would warrant refusal on amenity grounds.

Highways Impacts

6.51. Policy 41 of the HDPF provides that development should provide adequate parking within developments to meet the needs of anticipated users, and that parking provision must ensure a balance between good urban design, highway safety and residential amenity.

6.52. Policy 40 to the HDPF requires that development is of a scale appropriate to existing transport infrastructure, is integrated with a wider network of routes (including footpaths and cycle paths), includes opportunities for sustainable transport, is located in a manner which minimises the need to travel, affords access to a range of transport options and provides safe a convenient access for highways users. Chapter 9 of the NPPF seeks to ensure that sustainable transport modes are prioritised taking into account the vision for the site, the type of development and its location (para 115). Paragraph 117 further states that applications for development should 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.

6.53. Paragraph 89 seeks to support the rural economy, stating that 'sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).'

6.54. The proposed development would be accessed from Marlpost Road and provide a 55 space car park close to the eastern site boundary. Concerns have been raised in representations relating to the safety of the site's access and the adequacy of the parking provisions.

6.55. The Local Highway Authority (LHA) have reviewed the proposals and consider the access to be safe, providing appropriate visibility splays of 114m and 91m in each direction reflective of the 85th percentile recorded speeds on Marlpost Road, in accordance with established practice. As a consequence, the LHA do not consider that the proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, in accordance with Paragraph 116 of the NPPF.

6.56. Turning to the matter of parking, the LHA clarify that there is no standard requirement for parking set for football/playing fields and do not raise objection to the number of spaces proposed (55). The applicant has confirmed they expect up to 116 players and 55 parents/officials at any one time and indicate that the pitches would be used 2 - 5.5 hours a day. It is unclear whether the cross over period, between games, would result in additional people at the site in these periods. In this context, the number of parking spaces represents

around 50% of the total number of persons on the site at any one time. Whilst opportunities to walk/cycle to the site are very limited, leading to the majority of users arriving and departing by car, many would likely car share such as parents and children, whilst others would drop-off in the car park before departing. On this basis, Officers are of the view that 55 car parking spaces is appropriate, noting the potential to expand the car park if needed in the future.

6.57. It is noted that the proposal does not include information on electric vehicle charging, inline with SNP15. Were the proposal supportable on all other grounds information on this would be requested along with justification were the charging points not providable.

Sustainable Location and Active Travel

6.58. In terms of the aforementioned opportunities to walk and cycle to the site, these are extremely limited, whilst there are no bus services that serve the site. Whilst the Downs Link is located to the opposite side of Two Mile Ash to the site, affording a direct walking and cycling route into Southwater, access onto the Downs Link from the site is very poor. Pedestrians would need to walk along a grass verge for a distance of some 180m with vehicles (mainly other users of the pitches) passing close by before navigating a sharp blind turn in the road to access the connection onto the Downs Link. This is clearly an unattractive and unsafe arrangement. Likewise, cyclists would need to navigate the same road and blind corner at peak times of traffic to access the Downs Link.

6.59. Consideration has been given to whether alternative access points could be provided given the field extends close to the Downs Link, however any access point on the site's northern boundary would be unsafe for all users given there is the blind corner close to the east and a blind summit to the west.

6.60. Overall, given the separation of the site from Southwater, the absence of available public transport services, and the unattractiveness of Two Mile Ash and Marlpost Road for pedestrians and cyclists, it is anticipated that users would prove very highly reliant on the use of private car as a means of access to the site. In this regard the proposal is in conflict with the provisions of Policy 40 of the HDPF and Chapter 9 of the NPPF. Given this conflict, the site cannot be said to be well related to Southwater in transport terms, thereby failing to accord with Policy 43, which supports community use proposals outside of settlements only *"where a suitable site well-related to an existing settlement exists".*

Ecology:

6.61. Policy 31 of the HDPF states that development will be supported where it demonstrates that it maintains or enhances the existing network of green infrastructure. Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate.

6.62. Circular 06/2005 identifies that the presence of protected species is a material consideration when considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted. Information on biodiversity impacts and opportunities should inform all stages of development, and an ecological survey is usually necessary where the type and location of development are such that the impact on biodiversity may be significant and existing information is lacking or inadequate.

6.63. Information on the ecological interest of the site has not been provided by way of a Preliminary Ecological Appraisal (PEA). The Council's Ecology consultants have commented on the application and have requested further information including a Preliminary Ecology Assessment, ground level bat survey as well as a Reptile and Dormouse Survey

were the presence of the species considered possible. The requests are set out further in the following paragraphs.

6.64. As the Ecologist has identified the proposal lies approximately 10.3km east of The Mens Special Area of Conservation (SAC) and 15.7km east of Ebernoe Common SAC. It therefore lies within the 12km Wider Conservation Area for The Mens SAC, for which significant impacts or severance to flightlines must be considered. They also confirm the removal of the trees and hedgerow at the site may provide habitats for bats therefore a Ground Level Tree Assessment for bats is required.

6.65. The hedgerow to be removed to create access is understood to be a species rich native hedgerow comprising Hazel, Hawthorn, Dog Rose, Dogwood, Holly, Field Maple, Blackthorn, Bramble, Ivy, Oak trees and Field Maple trees. Hedgerows such as this can provide suitable habitat for Hazel Dormouse and were the PEA to identify the presence of dormice is possible a survey is required to clarify whether the species will be impacted by the development. Hedgerows can also provide suitable habitat for reptiles and were the PEA to identify the presence of reptiles is possible a Reptile Survey is also required to demonstrate the impact of the proposal on protected species of reptiles. Such surveys would be unable to now be carried out until March/April 2026, per established practice.

6.66. A Ground Level Bat Survey and a PEA accompanied with any Dormouse and Reptile Surveys (were presence of the species considered possible) are required to provide officers certainty of likely impacts on legally protected species and be able to secure appropriate mitigation. The Council's Ecology consultants have confirmed in their comments these would be expected prior to the decision-making process and cannot be secured by condition. As such the proposal is not considered supportable on ecology grounds and would be contrary to Policy 31 of the HDPF.

Water Neutrality:

6.67. Horsham District is situated in an area of serious water stress, as identified by the Environment Agency. In September 2021, Natural England released a Position Statement which advised all local authorities within the Sussex North Water Supply Zone that it cannot be concluded that existing water abstraction within the Sussex North Water Supply Zone is not having an adverse effect on the integrity of the Arun Valley SAC/SPA/Ramsar sites near Pulborough. The Position Statement advises the affected local authorities that developments within the Sussex North Supply Zone must not therefore add to this impact, and to achieve this, all proposals must demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.

6.68. In assessing the impact of development on protected habitat sites such as those in the Arun Valley, decision makers must, as the competent authority for determining impact on such sites, ensure full compliance with the Conservation of Habitats and Species Regulations 2017 (known as the Habitat Regulations). The Regulations require that a Habitats Regulations Assessment (HRA) be carried out to determine if a plan or project may affect the protected features of a habitats site, before the grant of any planning permission. Section 70(3) of the Regulations requires that planning permission must not be granted unless the competent authority (Horsham District Council) is satisfied that the proposed development will not adversely affect the integrity of the affected habitats site. Section 63 of the Regulations sets out the process by which an HRA must take place.

6.69. The requirements of Section 70(3) are reflected in paragraph 186 of the NPPF, which states that 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. The application site falls within the Sussex North Water Supply Zone which draws its water supply

from groundwater abstraction at Hardham (near Pulborough), adjacent to the Arun Valley sites. The water abstraction issues raised by the Natural England Position Statement are therefore material planning considerations relevant to the proposal. Given the requirements of the Habitat Regulations and paragraph 193 of the NPPF, adverse impact on the integrity of the Arun Valley sites must be given great weight in decision making. In order to demonstrate that no adverse impact will occur at the Arun Valley sites, all new development within the supply zone must demonstrate water neutrality, i.e., that water consumption from the site when occupied will not increase water abstraction in the Arun Valley.

6.70. The proposal does not seek to use mains water in the development leading to concerns over the lack of water and health and safety being raised in representations. Composting toilets are proposed with the use of hand sanitiser as a cleaning method, making the proposal water neutral.

6.71. It is acknowledged concerns about the sanitation at the site and number of toilets have been raised by the Environmental Health Officer and in representations however the Environmental Health team have not objected on these grounds. Were the proposal supportable on all other grounds a condition securing details of the composting toilets and the methods of sanitation would be recommended. This could include players bring drinking water with them to matches and training.

6.72. Subject to this condition Officers conclude that the project will not have an adverse effect on the integrity of the Arun Valley SAC/ SPA /Ramsar site, either alone or in combination with other plan and projects. This development would therefore not be in conflict with the conservation objectives for the Arun Valley SPA, SAC and Ramsar site which include 'maintaining or restoring the population of Qualifying Features'. In addition, Natural England have confirmed they have no objection to the proposal.

Drainage and Flood Risk:

6.73. Policy 38 (3) of the HDPF states *"Where there is the potential to increase flood risk, proposals must in corporate the use of sustainable drainage systems (SuDS) where technically feasible, or incorporate water management measures which reduce the risk of flooding and ensure flood risk is not increased elsewhere."*

6.74. The Lead Local Flood Authority (LLFA) have confirmed they have no objection to the application. The application would not result in the addition of significant impermeable surface whilst the type of development sought combined with its location is not considered to pose a significant flood risk. Furthermore, the modelled surface water flood risk is limited to the boundary of the site. The LLFA have recommended a pre-commencement condition requiring the submission of construction drawings of the surface water drainage network, associated sustainable drainage components and any flow control mechanisms and a construction method statement.

Other Matters:

6.75. Representations have been made raising concerns over the loss of agricultural land and also supporting the use of the land for community uses. Paragraph 187(b) of the NPPF has been considered as part of this assessment, which requires decision makers to recognise the benefits of best and most versatile agricultural land (BMV). The information available from DEFRA indicates the proposed site is allocated as Grade 3 land. The applicants have not provided information to indicate whether than land is Grade 3a (BMV) or 3b (not BMV). Given this officers are unable to carry out a full assessment of the versatility of the agricultural land at this stage. While a full assessment cannot be carried out it is not considered the proposal includes elements which would necessarily prejudice the land from being returned to agriculture use at a later date.

6.76. Representations have been made regarding crime and disorder. Subject to a condition securing a security strategy which would be secured if the proposal were supportable on all other grounds it is not considered the development would be likely to have any significant impact on crime and disorder, noting that Sussex Police have not raised any such concerns in their consultation response.

6.77. Concerns have been raised in representations about the safety and the quality of provision at the site. Sport England have advised that their lack of objection is subject to conditions being applied to secure additional information relating to the implementation and construction. This would include details of the sub-structure of the pitches to ensure they are suitably constructed and drained. Were the proposal supportable on all other grounds a condition securing this playing field information would be secured, ensuring the pitch was safe and of sufficient quality. Further to this the agent has confirmed that the pitches would meet FA standards and a condition securing this could be secured were the proposal supportable on all other grounds.

6.78. Finally, representations have been made raising concerns about the impact of the proposal on house prices and the consultation process. Impacts on house prices is not a material planning consideration. Officers have looked into the consultation carried out for the site and consider the appropriate legislation has been complied with.

Minerals Safeguarding

6.79. Under the West Sussex Joint Minerals Local Plan (JMLP July 2018) the entire site falls within a Brick Clay Mineral Safeguarding Area. A Minerals Resource Assessment (MRA) has not been submitted to identify whether economically viable mineral resources are present on site, and whether prior extraction is practicable.

6.80. Policy M9 (b) (iii) of the West Sussex Joint Minerals Local Plan requires that for non-mineral development (such as the current application), the decision maker must determine whether the overriding need for the development outweighs the safeguarding of the mineral. In addition, the applicant must demonstrate that prior extraction is not practicable or environmentally feasible. It is acknowledged that there is a relative abundancy of Brick Clay within the wider county and the application site relates in part to previously developed land.

6.81. The proposal lacks a substantive assessment of the underlying mineral resource and its extraction. This is acknowledged by the WSCC Minerals Officer; however, they also note in their comments the low priority of the extraction of brick clay given its relative abundance within the county.

6.82. The site is located 60m from the closest dwelling and considering the district as a whole is of a small scale. Furthermore, a PROW runs east to west within the boundary of the field below the site restricting the opportunities for extraction further. These constraints would likely reduce the viable area for extraction at the site.

6.83. Whilst acknowledging that a full assessment should have been submitted in support of the application, Officers understand that the location of the site, the relative abundance of Brick Clay within the area, and the relatively small area of the site where extraction might be possible, would likely lead to prior extraction of the site being unviable of unfeasible. In addition, as demonstrated in the principle section of this report there is clear need for the proposal. As a result, the safeguarding of the brick clay resource in this particular instance is likely to be considered a low priority.

6.84. The proposal therefore satisfies the requirements of Policy M9 (b) (iii) of the West Sussex Joint Minerals Local Plan.

Biodiversity Net Gain (BNG)

6.85. Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG), unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024, and that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that development may not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the Plan.

6.86. The Biodiversity Gain Plan must show how the development will achieve the required minimum 10% BNG using the statutory biodiversity metric tool and must demonstrate how the habitats will be managed and maintained for 30 years, starting from the date the development is completed. Off-site gains and significant on-site enhancements will be secured over this period by way of a Legal Agreement.

6.87. The Applicant has submitted a Biodiversity Metric which demonstrates a 15.72% net gain is achievable by way of significant onsite biodiversity gains. A legal agreement to secure the maintenance and monitoring of the significant onsite biodiversity gains for the required 30 years is therefore required.

Conclusions and Planning Balance:

6.88. The site is not allocated for development within either the HDPF or the Southwater Neighbourhood Plan (SNP) and is not designated as local green space, local community space or as a formal/informal sport area under Policies SNP5, SNP6 and SNP7 of the SNP. Nevertheless, Policy 43 of the HDP allows for community uses, such as playing fields, to come forward outside of settlement boundaries where they meet the identified needs of local communities, where a countryside location is the only practicable option, and where the site is suitable and well related to an existing settlement.

6.89. In this instance, the application evidences that there is a clear identifiable need for new playing fields given the applicants, Southwater Football Club, have had to vacate their existing facilities at Phillips Field, and given known shortfalls in pitch provision in the village demonstrated through the submitted information, the Council's Playing Pitch Strategy, and supported through representations. Likewise, it has been suitably evidenced that a countryside location is the only practicable option given the absence of sites within the defined settlement boundary of Southwater.

6.90. However, Officers do not consider that this site is suitable and well related to an existing settlement, as required by HDPF Policy 43. Principally, the site is not sustainably located, with access to the nearby Downs Link via grass verges along a country road where visibility for pedestrians and cyclists to cross to the Downs Link is poor. As a consequence, users of the facility would be dependent on the private car to access the site, leading to a proportionately significant increase in the number of vehicle movements at the site and on country roads leading to the site. At the anticipated capacity of some 116 players and around 55 parents/officials on site at any one time, particularly during weekend matches, the impacts from these vehicle movements, associated engine noise, and noise from the matches themselves, would be significant in what is currently a tranquil rural area. The dependence of the site on access by private car fails to meet the requirements of Policy 40 and Chapter 9 of the NPPF in promoting and prioritising sustainable transport choices when considering development proposals.

6.91. In addition, along with the above intrusive noise disturbance, the visual impact from the formal layout of pitches, associated paraphernalia, the 55 space car park, and site access

would be detrimental to the landscape character of the area contrary to Policies 25, 26, 32 and 33 of the HDPF.

6.92. Considering all matters in the round, the proposed significant level of activity would be contrary to Policy 26, whilst the proposal would alter the nature of the site with detriment to the surrounding rural landscape character contrary to Policies 25, 32 and 33 of the HDPF. Further, the site is not well related to Southwater and does not provide for realistic access by sustainable transport modes. As such it cannot be said to be a suitable location for the proposed use, contrary to Policies 40 and 43 of the HDPF and Chapter 9 of the NPPF. Further, the proposal also contains insufficient information to ensure the protection of and suitable mitigation of protected species, contrary to Policy 31 of the HDPF, and is not accompanied by a s106 legal agreement to secure BNG (albeit this could be secured in the event it is resolved to grant permission).

6.93. Officers recognise the clear benefits of providing these pitches to the community in terms of physical and mental health and community/social interaction, and the harm that has occurred from the Football Club being unable to continue to use their current pitches at Phillips Field. However, Officers conclude that these clear benefits, evidenced further by the large number of letters of support received from the community, do not outweigh the harm afforded by this site's unsustainable rural location. The application is recommended for refusal on this basis. In reaching this recommendation Officers have considered whether a temporary permission of 5 years would be appropriate, however there is no indication that alternative more sustainably located facilities would be available at the end of this period, meaning a request to extend this period would be likely.

7.0 RECOMMENDATIONS

7.1 To refuse planning permission for the following reasons:

1. The proposed development is in an unsustainable location given the absence of realistically accessible walking, cycling and public transport modes in the vicinity of the site. The proposals would therefore be highly dependent on the private car for access, failing to prioritise sustainable transport modes and achieve suitable access for all users, and failing to be well-related to an existing settlement, contrary to Policies 40 and 43 of the Horsham District Planning Framework (2015) and Paragraphs 115 and 117 of the NPPF.

2. The proposed development, by reason of the visual impact from the formal layout of pitches, associated paraphernalia including planting, the 55 space car park, site access, and noise from vehicles and users, would introduce a significant level of activity into this tranquil rural location, to the detriment of the landscape character of the area, contrary to policies 25, 26, 32 and 33 of the HDPF.

3. Insufficient information has been provided to demonstrate that the proposed development would have no adverse impact on priority and protected species and its habitat, contrary to Policy 31 of the Horsham District Planning Framework (2015).

4. No completed s106 legal agreement has been submitted to secure the delivery, maintenance and monitoring of the proposed significant onsite Biodiversity Net Gain, contrary to Schedule 7A of the Town and Country Planning Act 1990.