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Horsham Society,
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30th August 2016.

Dear Sirs,

Re: Outline Planning Application DC/16/1677 - Liberty scheme for North Horsham.

On behalf of Horsham Society I wish to lodge the following objection to the proposals contained in Outline Planning Application DC/16/1677 and submitted by Liberty. The information contained in the application is **Insufficiently** detailed to enable anyone to give full consideration to the offer made on this application.

Overview -The limit of development to the Northern side of the Horsham district was originally the A264, in order to maintain a green field buffer zone/strategic gap with Crawley. However due to the 'ad hoc' approach to planning matters that has prevailed within the Horsham District Council and the need for developers to satisfy their shareholders, the green field site to the North of the A264 is currently under fire from Liberty who have submitted outline planning application DC/16/1677. The Liberty Planning Statement is not clear in what it is offering in the proposals for the North Horsham development, although they record that the offer is compliant with every policy in the HDPF. However many questions remain unanswered and it is a far from clear what they are offering in this development package, as the wording in the Planning Statement leaves too many loose ends. It should be redrafted to make clear what Liberty are proposing, before consideration to any form of approval is given. **An outline approval before matters are cleared will only 'short change' the residents of Horsham.**

Ancient woodland and hedgerows - The site encompasses ancient woodland and extensive and mature hedgerows. Little thought has been given to the retention of these areas into the scheme, which would undoubtedly be enhanced by their incorporation. Indeed the proposal includes for a new road to slice through ancient woodland at Bush Copse: **this road should be rerouted to avoid this sensitive site and the closely adjacent residential development (package 2L of the Framework Plan) should be deleted and retained for wildlife.** The Environmental Policy Statement (page 286) indicates that Ancient Woodland is only important at 'district' level. This is **INCORRECT** as Ancient Woodland is of national importance, hence it is covered by the National Planning Policy Framework, where paragraph 118 states that "**planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland**". Additionally there is major loss of hedgerows which currently mask the site, caused by the massive road alterations and gyratory schemes on the A264; **these road junctions should be redesigned to lessen the environmental impact.**

Ecological issues - Woefully inadequate consideration has been given to the habitat of wildlife. There is no provision for wildlife corridors. Bird population is inadequately assessed, taking place on only 3 selected Spring days, without reference to long term studies. Mitigations only cover selected species and omit those birds that will be displaced once pasture becomes building land. The Ecology Statement confirms that many pasture based species, such as the Yellowhammer and Skylark will be displaced and will not return. The impact assessment for the bird population, badgers, reptiles, dormice and bats will be **HIGH IMPACT**, yet according to the environmental statement no mitigation is required. **The worry is that the Environment Assessment is far from acceptable and is clearly challengeable, yet it has NOT been independently validated.**

Wildlife corridors - We welcome the recognition of the need for wild life corridors, but new corridors need to be created, together with a detailed commitment to building and enhancing them, not just drawing them on a site layout. There need to be comprehensive and funded management plans for long term development and enhancement. The design and access statement (page 107) "envisages that the long term landscape management of existing and new landscape areas will be undertaken by two management companies. . . **"Envisages"** needs to be a commitment to creating Management Companies, with clear committed funding, a lifetime in perpetuity, purposes to include the enhancement and improvement of wildlife, not solely maintenance with accountable expenditure to prevent spending on non-wildlife projects.

A264 arterial road - Little thought has been given as to how the site is integrated with Horsham Town, as the A264 acts as a dividing line. This road is already busy and traffic flow will only increase during the next decade. At present Liberty propose introducing traffic lights and a pedestrian crossing, to provide access to the proposed development. The introduction of such measures would require a speed restriction, probably 40 mph, which would seriously impair the flow of vehicles on the A264. This could also serve to extend journey times for emergency vehicles, e.g.: ambulances to Crawley and East Surrey hospitals.

Pedestrian bridge - A pedestrian bridge has been proposed by Liberty. As well as being unsightly (I refer you to the bridge on the A24 which serves West of Horsham), it would do little to aid pedestrians or cyclists. **A minimum of two underpasses should be considered to Horsham** to make adequate provision for cyclists and pedestrians and would not detract from the street scene.

Waste re-cycling plant - Proposals for an access to the present waste re-cycling plant off Langhurstwood Road are unacceptable as Liberty propose closing the existing road and diverting refuse vehicles onto the new estate roads. This would require large vehicles to be driven through residential areas, **causing unnecessary danger to the public and possible environmental health concerns.**

A Parkway Railway Station - This type of station primarily serves a park and ride interchange as opposed to a township. Liberty proposes making £12,000,000 available for such a facility. The provision of a station of this type will not be the jurisdiction of Liberty, but that of the DfT, Network Rail or the Franchise operator. In order to maintain timetables, should a new station become reality, it would undoubtedly be necessary to close an existing station. Should the decision ultimately be made **NOT** to provide a new station, **would the £12,000,000 that Liberty advise is available in their costings be passed to Horsham District Council?**

A24 - Horsham to Dorking Road - It is unclear how this development will affect traffic flow on the A24, which is only a single carriageway. **Have the views of Surrey County Council been obtained?**

Commercial/Business - Liberty propose a total commercial/business floor space of 46,450 sq m (500,000 sq ft). The Liberty parameter Plan 2153A - 100J shows the commercial/business area being in one location on the South East corner of the site, bounded on two sides by the existing railway line, the proposed speculative Parkway station on the third side and the fourth side bounded by the A264. The HDPF policy is for a high quality business park, but at present there is little information on which one can pass comment. The proposed commercial building plots have no design code, but are stated as being a maximum height of 16 metres. The Phasing Strategy Plans are limited to residential, so the timing of the commercial/business development is unknown. Commercial office space in Horsham has currently an over capacity with some being granted change of use to residential. Therefore it is likely that the take up of plots will be slow and be dependent on price and the speculative creation of Parkway railway station and a second runway at Gatwick. Furthermore the assumptions for employment given in Appendix 8.2 should be used when calculating car parking spaces to be provided, to ensure that car parking does not encroach onto residential roads.

Retail/Shops - Liberty propose a total retail and ancillary service activities floor space of 6,800 sq.m. The Liberty parameter plan 2153A-100J shows the retail/shops local centre being one location adjacent to the Rusper Road roundabout. Liberty in their application, Appendix 8.3, give explanation that it is probable the proposed local centre at Land North of Horsham will not support the scale of services provided by small independent shops. Liberty recognise with Horsham town only 10 minutes away people will support Horsham as the major retail centre. However this seems to be in conflict with Liberty - Fig A3.3 which shows that it is planning for 4,900 sq m for **Food Stores**, which is sufficient for a major supermarket attracting customers out of the town and which would serve to increase traffic congestion on the A264. **This is also contrary to Policy SD3 of the HDPF as these proposals would have an adverse impact on Horsham town centre.**

Leisure Facility - There is little information about a leisure facility other than the allocation of 5,100 sq m. Liberty in their Planning Statement - paragraph 3.54 - state that some of the shared community sport and leisure provision may be able to be delivered on or adjacent to a school site. Contrary to the Liberty statement in paragraph 3.59 of the Planning Policy Statement the provision of open space, sport and recreation is **NOT compliant with Policy SD1 and SD3 of the HDPF.**

Education - Liberty in their Planning Statement paragraphs 3.38 to 3.44 state the developer will be expected to make land available for the facilities - 2 No. primary schools or equivalent and the capital cost of construction of the primary school and land and financial contribution for a 6 form entry secondary school and other facilities. Contrary to the Liberty statement in 3.44, the Planning Statement does not clearly set out how compliance with HDPF policies SD1 and SD88 will be achieved. **The proposal from Liberty must be redrafted to make it unambiguous.**

Healthcare - Liberty in their Planning Statement paragraph 3.50 state the developer responds positively to this matter by including the potential for healthcare provision within or adjacent to the proposed Local Centre. **Contrary to the Liberty statement this is not compliant with the Policy SD1.**

Affordable housing - The National Planning Framework requires local Planning Authorities to **positively** seek to meet development needs in their areas. Government legislation advises that

developers are required to provide a proportion of affordable housing on developments in excess of 10 houses, at a rate of 35% - 50%. The percentage used is dependent on the Local Authority.

The Horsham District Council Planning Obligations Document of May 2016 refers to HDPF policy 16. This reduces the provision of affordable housing to 35%, but only on developments of 15 house or more and over 0.50 hectares in size. **Horsham District Council are NOT complying with Government Legislation.**

Liberty are only offering affordable housing at a rate of 30%. **This is NOT acceptable.** Horsham District Council **MUST** enforce the minimum percentage of 35%, as contained in policy 16 of the HDPF.

Furthermore affordable housing normally forms a part of a Section 106 agreement. There is no such agreement proposed for this project. **How do Horsham District Council propose to enforce it?**

If Liberty advise that current market conditions have changed, as at their Kings Mill development, so as a result the original Viability Appraisal is no longer viable, this may serve to reduce the provision of affordable housing. The resolution of such matters could be lengthy, as the developer would be required to demonstrate costs, probably using an 'open book' procedure. **How do Horsham District Council propose to police and enforce the affordable housing element of the project?**

Community Infrastructure Levy (CIL) - This provides for a contribution from the developer for the provision of infrastructure or the refurbishment of existing provision to support the additional burden that new development makes on both local and strategic infrastructure. It is our understanding that there is to be **no CIL contribution from Liberty** on the North of Horsham development. **How do HDC propose funding any additional burden that the scheme will impose on the existing infrastructure, or any 'off site' infrastructure that may well be required to service the new development, or any adjustments, modifications and improvements, without reducing provision elsewhere?**

Different Plot References - References on the Phasing Plans are different from those on the Framework Plan-Development, so very confusing about which plot or site is being referred to. For example land in the far East of the site is referenced on Phasing Plan as 2C and the northern site adjacent to the play area and the ancient monument is 2A. Yet on the Framework Plan-Development area 2C becomes 2A and area 2A becomes areas 4A and 4D. **Drawings require amendment to ensure that there is NO conflict of information.**

Building types - Although there is an extensive section in the Design and Access Statement, (pp 34-51) on Evidence of local character, it is not clear where this evidence leads. There are character areas defined in the Design and Access Statement (p 113), but how will these be imposed and complied with? Also there is a risk of too much nostalgia and rural idyll, but **NO design spark.**

In order to monitor design, there should be a statutory Design Panel appointed, including stakeholders, public representation and bodies such as Horsham Society, to review each design package submission, to ensure cohesion and compliance.

Density - There are two Density Parameter Plans listed, 2153A-1003 and 2153A-1013. These may be the same and one may possibly be an appendix, but this is confusing. Some of the highest density areas, and also the greatest building heights are packages 1A, 1B and 3E, which are those closest to the A264, exactly where the major road schemes will remove large sections of woodland and hedgerows. Removal of these features will reveal the **undesirable intensity** of the development. **Either the woodland must be retained or the density and height reduced.**

Estate roads - The proposed Primary Road North of Morris Farm is inappropriate, as it would provide an access to land **off site** for future potential development. **This road should be resisted and rerouted.**

West Sussex Strategy for Walking and Cycling - This application does not appear to have taken into account the current and newly adopted West Sussex Strategy for Walking and Cycling which exists "to provide guidance in support of prioritising cycling and walking infrastructure in new development" (p2). There is insufficient detail in the Site Wide Framework Travel Plan to support this approach. There is nothing in the document that indicates an interest in describing, delivering, or let alone prioritising cyclists. 4.1.1 lists items that "could be included" **but no commitments. This must be rectified with firm designs and commitments as a part of this infrastructure outline planning application.**

Cycling - Comprehensive cycling and pedestrian routes are needed both North - South and East - West across the development. Currently the illustrative masterplan indicates numerous routes on both axis. However on the definitive Movement and Access Plan only very few routes are indicated and these are mainly East - West, thus providing a totally inadequate network for non vehicular traffic. **The Movement and Access Plan needs to be changed to ensure that the illustrative masterplan becomes definitive.** These off road routes should be constructed as segregated walking and cycling paths.

It is patently clear that Liberty need to clarify many points in their offer, before a considered decision can be made by officers of Horsham District Council in respect of outline planning application DC/16/1677.

If it would be of help, members of the Horsham Society Planning Committee would be pleased to meet you to have discussions and expand on our thoughts regarding the development of land North of Horsham, thus enabling our comments as detailed in this letter to be developed.

Yours faithfully,

David Griffiths . (secretary to Horsham Society Planning Sub Committee)