

**HORSHAM
SOCIETY**

**HORSHAM SOCIETY RESPONSE
TO
HORSHAM DISTRICT COUNCIL'S
CONSULTATION ON ITS DRAFT
PREFERRED STRATEGY**

OCTOBER 2013

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1 Introduction

1.1 This is the Horsham Society's response to Horsham District Council's consultation on the draft preferred strategy.

1.2 The Horsham Society is opposed to key elements of the draft strategy and believes that it neither conforms to the National Planning Policy Framework nor is it in the long term interest of Horsham town and the wider district. We are, therefore, seeking a root and branch re-evaluation of the options and a fresh approach.

1.3 We shall show that the draft strategy fails the 'soundness' test in that it has not been prepared positively, the proposals are not justified and will not be effective, and it is not consistent with national policy. Furthermore, the way in which potential options have been dismissed runs counter to the presumption in favour of sustainable development.

2 Executive Summary

2.1 The process, analysis and recommendations in the draft strategy are fundamentally flawed. There are better options available.

2.2 The North Horsham strategic site is wrong in planning terms and would seriously damage the town without delivering the benefits claimed.

2.3 A better strategy would be to concentrate aggressively on identifying and developing all the brownfield sites in the district and bring forward the new town option. Together with other proposals these would meet the need in terms of housing numbers and trajectory with the planned homes at Billingshurst and Southwater being followed by brownfield sites and the new town nearer the end of the planning period.

2.4 Specifically we ask that:

- the draft preferred strategy be scrapped and the process started again
- the flawed policy of very large strategic sites bolted on to existing settlements be dropped
- no significant development be permitted north of the A264
- a proper assessment is published of all brownfield land within the district (including Horsham town) and its suitability for housing
- work is resumed urgently on the creation of a new town

- the Mayfield Market Town proposals are given serious consideration
- housing development and business space are spread more evenly throughout the district
- an assessment is published of all green spaces (particularly within Horsham town) and appropriate protection afforded to them
- proper steps be taken to ensure the prevention of further settlement coalescence through the reconfirmation of the strategic gaps between Horsham and Crawley, and Horsham and Southwater; the creation of ‘New Green Belts’ or other policy steps that would achieve this objective.

3 Strategy not positively prepared – a flawed process

3.1.1 The whole process has been confused and muddled with unexplained U turns in policy and a lack of strategic thinking. This is partly because the Council has been simultaneously wrestling with the fallout from the failure of its 2007 core strategy to deliver the previously agreed housing trajectory and availability of developable sites, at the same time as trying to work up a new strategy. It has also been bedeviled by a mindset that the Council should do the minimum that it can get away with in particular a minimal change to the 2007 core strategy, a minimum number of extra houses, a minimum number of new sites and a minimal amount of public engagement and explanation.

3.1.2 It has at times been unclear whether the Council has adopted a strategy of updating the 2007 core strategy or producing a new one its approach oscillating between the two as policies have been proposed and then dropped. Nevertheless the preferred strategy says “there is a need to review and update” the core strategy (para 1.3) which suggests that it forms the starting point from which any changes in strategy must be justified in the light of new evidence. This, the Council has failed to do.

3.1.2 The result is that the proposals do not tackle the failings of the core strategy. There is no common or logical thread between the Council’s various policy statements since its adoption in 2007 and the fundamental changes are insufficiently evidenced.

3.2 Learning the lessons of the 2007 core strategy

3.2.1 The 2007 core strategy was predicated on the provision of new housing in two strategic sites, only one of which – west of Horsham – was designed primarily to meet the needs of Horsham district. Following examination in public the Inspector said the policy “provides little in the way of reasonable flexibility in the event of faltering housing delivery, thus failing Test 9”. To remedy this, he required the Council to provide more land through site specific allocations or a contingency Supplementary Planning Document (SPD).

3.2.2 In the event the Inspector’s fears were fully realised. Housing delivery stalled on

the west of Horsham strategic site and despite the 'Reserve Housing Sites SPD' in 2008 the Council still failed to meet the necessary five-year land availability test. A further SPD – 'Facilitating Appropriate Development' was approved in May 2009 but this too failed to make an impact. By January 2011 the district was at significant risk from speculative development outwith the core strategy and HDC issued its 'Draft Interim Statement (DIS) – Managing Development in Horsham'.

3.2.3 This unedifying history merely goes to show that the Inspector was right in suggesting that putting almost all the new housing into a single large strategic site was unwise. Yet this is exactly what the Council is proposing to do again with the North Horsham strategic site.

3.2.4 Unpredictability and delays in build out rates are not the only problem with huge strategic sites. Experience with the west of Horsham site has shown that very large sites bolted on to existing communities lead to expensive infrastructure demands, particularly over-engineered highway solutions, which consume a very large proportion of the available Sec 106 funding. In short, the infrastructure requirements of the strategic site itself uses up all the funding leaving no community benefit for the town to which it is attached. In the case of west of Horsham this problem was made worse by the insistence of developers on renegotiating the S106 payments on the grounds of affordability.

3.2.5 The suggested benefits of large bolt-on strategic sites are largely an illusion. The only real benefit is that they are probably cheaper initially for the planning authority to manage than multiple sites; but that is not a valid planning argument in their favour and in any case the problems with west of Horsham show that in the long run even this is probably untrue.

3.2.6 The principal lesson that can be drawn from these events is that large strategic sites bolted on to existing settlements are not an effective way of delivering new housing and that a dispersal policy with a number of smaller sites would be better.

3.3 The proposed north Horsham strategic location was ruled out in 2007

3.3.1 The 2007 core strategy specifically ruled out development north of the A264 northern bypass:

"in order to avoid issues of lack of integration or 'detachment' from any existing community" (para 3.8).

The onus on the Council in updating its strategy is therefore to show why its assessment in 2007 is not longer valid. It has failed to do so.

3.3.2 The western part of the proposed North Horsham strategic location lies within the Horsham/Crawley strategic gap, the inclusion of which was supported by the Inspector following the public examination and is covered by policy DC 3 of the 'General Development Control Policies 2007' designed to avoid settlement coalescence which says:

“within areas designated as a Strategic Gap or immediately abutting the boundaries of a Strategic Gap, development will not be permitted unless it:

- i. makes a positive contribution to protecting, conserving or enhancing the landscape and amenity of the Gap; or,*
- ii. provides opportunities for quiet informal recreation.”*

The proposed development within the strategic location clearly fails these tests and the Council must thus explain why the arguments it put against perceived settlement coalescence in 2007 are no longer valid. This is has failed to do.

3.4 Lack of evidence for housing target

3.4.1 Despite the Council’s own evidence base, and the consultation in Spring 2012, no case has been made for the proposed target of 575 homes per annum. The figure has simply been plucked out of the air. A margin of error of only 5% is equivalent to nearly 600 homes – more than the number allocated in the preferred strategy to either Billingshurst or Southwater over the next 20 years.

3.4.2 The Council has dragged its feet over neighbourhood planning and therefore has no basis for assessing housing need or local opinion within local communities to provide a bottom-up reality check on its top-down guess. Further, the Council’s assumption that sites for 500 additional homes will emerge through the neighbourhood plans has no evidential basis. It is simply a guess, or a balancing figure.

3.4.3 The case for 575 homes per annum has not been made and it therefore follows that the preferred strategy is flawed at the outset.

3.5 Incomplete evidence base – brownfield sites

3.5.1 The Council has not sought to identify, evaluate and rank the totality of brownfield sites in the district that, in accordance with the NPPF, should be considered for development ahead of greenfield solutions. Without this the Council is unable to justify further greenfield development.

3.6 Unexplained policy U turns

3.6.1 When rejecting development north of the A264, the 2007 core strategy signalled the need for further development beyond 2018 and that in all probability it would have to be in Billingshurst and Southwater:

“.... some communities have already experienced major change in recent years and ... for Broadbridge Heath in particular, further change is inevitable. In the longer term this may also apply to Southwater and Billingshurst depending on the scale of development necessary in the District and the sub-regional policy objectives being addressed” (para 3.9).

3.6.2 In December 2008 the Council adopted and published the ‘Horsham Town Design Statement SPD’. This was an early example of what is now called localism with the three neighbourhood councils, North Horsham Parish Council and the Horsham Society joining forces to produce and consult upon a single design statement for the Horsham town built up area. It states (page 5):

‘For the future every effort must be made to contain the built-up area within its present boundaries’.

This is current Council policy and it reaffirms the 2007 core strategy.

3.6.3 In September 2009 the Council published its core strategy review which offered nine strategic site options including: west of Ifield (3,000 homes), Faygate (2-3,000), two sites north of the A264 (total of 3,500 houses), south of Horsham (1,500), west of Southwater (2,750), east of Billingshurst (1,750), Adversane/North Heath (4,000), and Pulborough (280). There was also the suggestion that a new town of up to 10,000 homes delivered over 15-20 years might be an alternative.

3.6.4 Following public consultation in March 2010, with virtually no explanation or justification the Council announced it was dropping all but west of Ifield, north Horsham, Billingshurst, Southwater and in the longer term perhaps a new town.

3.6.5 Little progress was made in the following months. Facing the real risk that the lack of a five-year land supply might lead to uncontrolled development the Council published a draft interim statement in January 2011. This sought to build on the core strategy:

“[The DIS] has been prepared on the basis of the housing requirements of the South East Plan and the vision, objectives and development strategy, which focuses on development in/adjacent to the most sustainable settlements, of the adopted Core Strategy.”

The statement was to ‘bridge the gap’ between the core strategy and the core strategy review and proposed to bringing forward strategic sites in Southwater and Billingshurst. North Horsham and west of Ifield were left for consideration in the core strategy review, as was the possibility of a new town. The DIS outlined in great detail the case for building in Southwater and Billingshurst and the community benefits that could be derived. It made clear that the proposals were deliverable (para 5.18):

“The proposals ... for Billingshurst and Southwater have been worked up with the developers and Reference Groups and are considered feasible and deliverable.”

However, following consultation the DIS was dropped.

3.6.6 At the Council’s Strategic Planning Advisory Group (SPAG) meeting on 11 September 2012 an assessment matrix was tabled which ranked each of the remaining strategic options. It showed Southwater was the best choice, followed by North Horsham and Billingshurst. However, at that stage the North Horsham option included

provision for a new hospital, which increased its overall score. The hospital has of course since been dropped and if the matrix score had been adjusted to reflect this, Billingshurst ranked higher than North Horsham.

3.6.7 At the SPAG meeting on 3 October 2012 a paper about the potential for infrastructure delivery from the possible strategic sites was based on up to 1,750 homes in east Billingshurst, 2,750 west of Southwater, 2,500 west of Ifield and up to 4,500 in North Horsham. This latter assessment was still based upon provision of a new hospital, but all the other infrastructure deliverables were the same as now proposed in the preferred strategy.

3.6.8 At the same SPAG meeting a draft of the emerging preferred strategy was presented omitting key data on housing targets and strategic sites but including a summary of the results of the consultation on the Council's review of the core strategy. This revealed a lack of consensus but the minutes say "*a new settlement was also considered an option to be considered*". The declared intention was to finalise the draft for consideration at a full council meeting on 24 October 2012 and then proceed with a six week consultation starting on 2 November 2012. Neither of these happened.

3.6.9 In an article, published in the West Sussex County Times on 29 November 2012 under the headline 'How many more homes do we need and where do we put them?', Cllr Ray Dawe, Leader of the Council, wrote that "*previous assessment has suggested that this could be at Southwater, Billingshurst and north of Horsham; a new town was "a possibility later in the plan"*".

3.6.10 In December 2012, Cllr Ray Dawe, Leader of the Council, announced he was taking personal control of the preparation of the preferred strategy.

3.6.11 In April 2013 Cllr Claire Vickers, member for Southwater, was appointed cabinet member responsible for planning. On 27 June 2013, out of the blue, the West Sussex County Times revealed in "an exclusive" that the new strategy would cap development in Southwater and Billingshurst and put 2,500 homes north of Horsham.

3.6.12 This decision was in our view simply politically inspired in complete contradiction of previous evidence presented to the council and the public, and a clear failure of due process.

3.7 Conclusion does not match the Council's own evidence

3.7.1 On 25 July 2013 the full Council received and approved the draft preferred strategy. It differed significantly from the version considered by SPAG on 3 October 2012 in that all reference to the outcome of the public consultation had been removed. This public consultation has never been published. It also varied substantially from the previous assessment of site options. Proposals included 500 new homes each in Billingshurst and Southwater, and 2,500 in North Horsham despite the previous assessment that this site was not as advantageous as Southwater (and without a new hospital less advantageous as Billingshurst). No adequate explanation has been given for this volte face. The site assessment has simply been rewritten to fit the decision.

3.8 HDC too ready to drop the new town proposal

3.8.1 The Horsham Society has long argued that if greenfield development is inevitable the best approach would be to create a new town, probably somewhere close to the A23 corridor. HDC, Crawley BC, and Mid Sussex DC commissioned a joint feasibility report that demonstrated that such an approach was feasible. We understand Mid Sussex subsequently pulled out of discussions in order to focus its development on Burgess Hill. We consider this quite unacceptable and it certainly does not discharge Mid Sussex's duty to cooperate. However, rather than mount a challenge to the Mid Sussex preferred strategy HDC has simply caved in. Horsham district needs a new town and it is the duty of the Council to pursue this as vigorously as it is prepared to pursue other aspects of its strategy.

3.8.2 The benefits of a new town close to the A23 would include removing the pressure for large developments bolted on to existing towns and villages, which risk destroying traditional communities, creating a new community with its own identity and local infrastructure, and providing a new economic and social focal point within the district for the southern area which currently look towards Worthing and Brighton rather than Horsham for their shopping and leisure.

3.8.3 HDC's own assessment (in a paper presented to SPAG on 3 September 2012) suggests that a new town could deliver 2,500 homes in the short to medium term.

3.8.4 It is relevant that in the Chancellor of the Exchequer's 2011 Autumn Statement he announced the Government's support for the creation of new garden cities.

3.9 Reliance on an outdated developer led plan for North Horsham

3.9.1 The Council has given little or no thought to how the proposed North Horsham site should be developed but instead simply picked up a developer's plan and reproduced it as its own. Worse, it has picked up a plan for an earlier scheme for 4,500 homes as the developer still hasn't produced a revised one with 2,500 homes.

3.9.2 The result is a set of proposals that are poorly thought out, unworkable and damaging to the town.

3.10 Failure to take account of potential second runway at Gatwick

3.10.1 There is an existing agreement between West Sussex County Council and the owners of Gatwick Airport that there will be no second runway before 2019. The company has made no secret of its wish to build a second runway, as soon as the agreement expires, south of the present one and plans have been drawn up for some time. It has submitted evidence to the Davies Commission and WSCC has formally agreed in principle to a second runway. Despite the fact that if approved the runway could be operational within the life of the preferred strategy no account has been taken of this.

3.10.2 A second runway at Gatwick would have a significant impact on the economy

and housing requirements and it is unacceptable that these issues have not been included in the Council's analysis and options assessment. Arguably, if there is to be a second runway south of the present one the case for maintaining the countryside buffer between Horsham and the airport might be all the stronger, and the case for the North Horsham development much weaker. Without a proper assessment of the impact of a second runway within the life of the plan the preferred strategy must be unsound.

3.11 Possible conflict of interest

3.11.1 Following her appointment as Cabinet member responsible for planning, Clare Vickers, district councillor as well as parish councillor for Southwater, gave an interview to the County Times, published on 18 April 2013, in which she was asked about her position on a plan by Berkley Homes to build 2,750 homes west of Southwater (then one of the possible strategic sites). Her reported response was that:

"her first duty was to those who voted for her, balanced against the needs of the whole District."

3.11.2 In an article in the County Times and published on 25 July 2013 - the same day the Council was considering the draft preferred strategy - she wrote:

"Southwater and Billingshurst already have applications for about 500 homes and as one of the local members for Southwater I have been striving to minimise the effect on our existing community and to get the best additional facilities".

3.12 Too little time for consultation and little effort to engage with the public

3.12.1 The period of public consultation started on 16 August 2013 and ended on 11 October 2013 – a period of only eight weeks, part of which covered the school holidays. Not only was this insufficient time to allow proper reflection and debate but the Council made almost no attempt to engage meaningfully with the public to explain and make the case for the proposals.

3.12.2 There were no public exhibitions or meetings arranged by the Council. The Leader of the Council personally refused a request from the Horsham Society to attend a public meeting in Horsham to explain and defend the Council's strategy. An open Facebook session with Claire Vickers degenerated into farce with most of the questions either unanswered or dealt with superficially. Later Q & A in the County Times did not provide an opportunity for supplementary questions and was in at least one important respect misleading (see para 4.4.7).

3.12.3 The Council has completely failed in its responsibility to engage with the community and consult meaningfully over its proposals.

3.13 Flawed Interim Sustainability Appraisal

3.13.1 A study of the documents produced by the Council in the period up to the point at which the draft preferred strategy was produced like a rabbit out of a hat, lead to the

inevitable conclusion that the sustainability appraisal has been retrofitted to match the policy. Furthermore, it has been retrofitted in haste with errors including, as a positive factor that an A&E hospital might be provided in the North Horsham development, when this has been categorically ruled out.

3.14 Conclusion - a wholly flawed process

3.14.1 We consider that the whole process has been flawed, the final proposals are inconsistent with the evidence previously provided by the Council and they should be rejected.

4 Proposals not justified – the wrong strategy

4.1 The draft preferred strategy is not the most appropriate strategy for the district, and particularly not for Horsham town, when considered against the reasonable alternatives.

4.2 Wrong assumptions

4.2.1 The preferred strategy makes the assumption that Horsham town must remain the only 'main' settlement in the district. There is no evidence or rationale for this approach. Other districts, including Mid Sussex, are successful economically and socially with two or three towns of similar size. Indeed, there are benefits in that each has its own hinterland of villages that gravitate towards them for their shopping and leisure needs. The position of Horsham town within the district makes this impossible and the southerly villages look beyond the district for their main shopping and leisure thus depriving the district of that economic activity. There would be substantial economic benefit for the district as a whole were one of the other settlements enlarged or better still a new town created.

4.2.2 The assumption that Horsham district needs a new business park and that it must be situated north of Horsham town is flawed and fails to take account of changes in the nature of business. The chances of attracting large employers are slim. Crawley, which has a surfeit of capacity for business parks, will always be a more attractive option. On the other hand, small businesses can be encouraged into the district but there is no evidence that a single site is a better option than dispersal. This would be more environmentally friendly and support the Government's policy of encouraging new business in rural areas.

4.3 Large strategic bolt-on sites are a poor option

4.3.1 As we have already explained experience west of Horsham has shown that large bolt-on strategic sites cannot be relied upon to deliver the expected build out trajectory and may offer little or no wider community benefit where the infrastructure costs for the site itself swallow up all the available S106 funding. There is also the issue of loss of community identity as towns increase beyond a certain size, perhaps around 50,000 residents, particularly if they extend beyond their natural boundaries.

4.3.2 Smaller strategic sites may be justified in some instances where, once completed, they will 'round off' an existing built-up area, meet some pre-existing infrastructure deficit (such as schools) or make a direct and substantial contribution to town or village centre regeneration.

4.4 North Horsham is the wrong strategic option

4.4.1 Orphan settlement. The reasons given in the 2007 core strategy why development north of the A264 would be wrong are just as valid today. The A264 was built as a northern bypass within which the 1980s enlargement of the town was contained. It creates an almost impenetrable barrier with only a single indirect road access into the town down the narrow Ruser Road. There is nowhere suitable to create another vehicular access and none is planned. This will result in the creation of an orphan settlement which would look to Crawley for its shopping and leisure, having little physical or spiritual attachment to Horsham town.

4.4.2 Standalone community. It is relevant that an analysis of potential sites presented to the SPAG meeting on 3 October 2012 assumed that any development north of Horsham would have a 'village centre', suggesting a standalone settlement bolted on to Horsham with its own identity. The developer has responded to the accusation that the settlement now proposed will have no community identity by pointing to the provision of a café in the new parkway station, a local convenience store, leisure facilities and the superstore. These a community will not make. But even were it possible to create a standalone community it would in reality produce immediate settlement coalescence with Horsham, something which current policy is designed to prevent.

4.4.3 Loss of identity. The proposed strategic development is at odds with the Council's expressed policy in the 'Horsham Town Design Statement SPD' (page 24) which says

"Were there to be further outward development it would be very unlikely that Horsham could retain its identity or essential character. ... The A264 forms a strong northern boundary within which residents can clearly identify with the town. Were this boundary to be breached there would be no obvious natural northern boundary and residents would inevitably identify more with Crawley than Horsham." And (page 25) 'Development should reflect the wish to maintain the current built-up boundary in order to protect the setting of the town and its relationship to the countryside; and a strong desire to avoid coalescence with neighbouring communities, large and small.'

4.4.4 Risk of future coalescence. The risk of future coalescence with Faygate would be heightened by this proposal as the eastern boundary would be very weak and open to future pressure from developers. The eastern part of the strategic site lies within the current strategic gap between Horsham and Crawley designed specifically to prevent settlement coalescence. With the erosion of the eastern end of the original gap following approval for the Kilnwood Vale development in the 2007 core strategy it is even more important that the western end does not suffer similar erosion.

4.4.5 Loss of green fields. The open countryside north of Horsham is an important part of the town's setting and character and will be even more essential if Gatwick expands further. There is no need for greenfield development alongside Horsham town as there is a considerable amount of brownfield land available within the town itself and in the district as a whole.

4.4.6 Traffic and pollution. Work is already underway on 4,500 new homes west of Horsham and west of Crawley. Although these will not be completed for years to come, traffic volumes on the A264 are already rising, together with noise and air pollution. The A264 already operates to capacity in peak hours. The Council has provided no estimates of traffic flow and capacity or explanation as to the improvements that may be needed to the A264.

4.4.7 Proposed new railway station is unlikely. The promised new railway station is unlikely to be built. HDC promised another at Bewbush, west of Crawley, as part of the Kilnwood Vale development for which it granted planning consent in October 2011. But so far there is no sign of it being built. Documents released by HDC under the FOI Act show that Network Rail has said that it would not be possible to build new stations both at Bewbush and North Horsham. Further, were a new station to be built at North Horsham Faygate station would almost certainly close and Littlehaven station, only a mile to the south, would have its service reduced as trains would not stop at both Littlehaven and North Horsham. HDC has cynically tried to use a single possible new station to justify another strategic location in a different strategy. In reality neither is ever likely to be built and cannot be relied upon to support the justification of the North Horsham strategic site.

4.4.8 No benefits for the town. Unlike the opportunities at Billingshurst and Southwater where the Council has identified specific examples where developer contributions could provide much needed schools or town centre investment, no benefits have been identified for Horsham town from the proposed North Horsham development. There are no plans for developer contributions to improve the town's existing road, health, parking or leisure facilities.

4.4.9 Threat to town centre retail economy. The developer's scheme for North Horsham is predicated on the early provision of a major superstore. The Council's 'Horsham Town Plan SPD' published in September 2012 as the Council was finalising its preferred strategy says:

"Through this SPD, the Council is seeking to promote a clear 'town-centre' first approach to retail development to ensure that piecemeal development opportunities in out-of town locations do not undermine the long-term vitality of Horsham town centre. (para 3.2)"

Thus the inclusion of a superstore would be directly contrary to the Council's 'town centre first' policy and damaging to the town centre retail economy; and would also be contrary to the intent of Draft Policy 4.

4.4.10 No defensible boundaries to further development. The lack of defensible boundaries to the north and east will risk future settlement coalescence. The proposed countryside buffer will offer little or no protection against further development and is laughably narrow at some points. There is no proposal for formal protection such as ‘New Green Belt’, the reintroduction of a formal strategic gap or some other policy which achieves the same effect.

4.4.11 No evidence of need for business space. Existing local planning consents have not been implemented. There is also a surplus in Crawley with better links to Gatwick. If closeness to Gatwick is not the main criterion then why build here rather on brownfield sites elsewhere in the district?

4.5 There are better options

4.5.1 Two alternatives stand out which, together with the recent approval for significant development at Billingshurst and the modest proposal for Southwater, could provide our housing needs for the twenty years. The first is an aggressive policy which targets brownfield sites throughout the district. It is difficult to estimate how many homes could be provided this way simply because HDC has failed to provide the necessary evidence base but it would be in the high hundreds if not more. The second is a new town, possibly along the lines already proposed by Mayfields Market Town. This would support the Government’s wish to see the creation of new garden cities.

4.5.2 This approach would deliver an acceptable build out trajectory, with Billingshurst and Southwater delivery in the earlier years, brownfield sites in the mid period and the market town towards the end.

4.5.3 It is important to explain why we believe that a new town need not suffer from the same disadvantages of large strategic sites bolted on to existing communities. A new town would grow over time into a much larger self-contained new community with its own character and local infrastructure designed to meet its own particular spatial and physical requirements. Infrastructure costs would be spread over a larger development, over a longer period and be directly associated with it. It wouldn’t be faced with demands to make good pre-existing weaknesses and shortfalls.

4.5.4 If the Council remains wedded to its failed strategy of huge bolt-on strategic sites then, based upon its own previous assessment, both Southwater and Billingshurst provide better options for large scale development than North Horsham. It would be much easier to integrate the new homes with the existing communities (the vehicular and pedestrian links are much better) and the opportunities for infrastructure improvements within the existing communities have already been identified. The Council cannot deny that this is the case because it is exactly the one it made when it produced its ‘Draft Interim Statement’.

4.5.5 Horsham town’s contribution to this alternative strategy would come from the development of the significant brownfield land within the current built-up boundary such as the non-operational part of the station goods yard and associated industrial land, Searle’s Yard, Novartis, and Hurst Road public estate.

5 The policies will not be effective

5.1 The test that must be met is whether the plan would be deliverable over its period and is based on effective cross-boundary strategic priorities. In our view all recent local evidence points to large bolt-on strategic sites as being a thoroughly unsatisfactory way to deliver housing. It puts too much power in the hands of a single developer, strangles competition and delivers virtually no planning benefit to the host community.

5.2 A single bolt-on strategic site is a flawed strategy

5.2.1 All the difficulties that HDC has experienced in regard to housing delivery and the threat of unplanned development can be traced back to its decision to locate almost all new housing in two huge sites. Now it proposes to make the same mistake with North Horsham.

5.3 Failure of cross-boundary cooperation

5.3.1 It is patently clear that the preferred strategy is not based upon effective joint working on cross boundary strategic issues. Attempts by HDC and Crawley BC to work with Mid Sussex DC to meet housing need within the Gatwick Diamond, particularly the creation of a new town in the A23 corridor, have been frustrated by Mid Sussex. HDC has simply accepted this wholly unacceptable situation and in doing so has settled for a sub-standard strategy, which does not satisfy this test or properly meet the needs of the district.

6 The proposals are not consistent with national policy

6.1.1 The main proposals in the preferred strategy are not consistent with the NPPF because they fail the basic test of achieving sustainable development.

6.2 Balancing the economic, social and environmental roles

6.2.1 The preferred strategy seeks to constrain economic development within the very northernmost area of the district and justifies this by the influence of, and need to support the economy of the Gatwick Diamond. Whilst this is certainly important there is no evidence that there is a shortage of modern business premises, for example, or land allocated for their provision: indeed there is a surfeit of unused space in Crawley, much nearer to the Airport and in a more sustainable location.

6.2.2 In November 2010, on the back of a report by Bio City Development Company HDC sought to justify the creation of a business park in North Horsham as an adjunct to a major hospital, termed a bio-city. There may have been some justification for an approach which sought to cluster companies providing medical research and services around a hospital but it evaporated as soon as the idea of a new hospital was dropped. The current proposal for a business park has no similar policy basis and is simply retained in an attempt to portray the North Horsham development as more than just houses. The requirement in the NPPF to *“plan positively for the location, promotion and*

expansion of clusters, or networks of knowledge driven, creative or high technology industries” would be better met by identifying opportunities within or close to the smaller settlements and encouraging the re-use of redundant agricultural and industrial premises, thus spreading the economic benefit.

6.2.3 There is no evidence that the Gatwick Diamond per se requires a significant population increase consistent with a policy of locating almost all new housing in the north of the district. On the contrary, the district’s demographic profile and projections shows an ageing population with an increasing need for services to be provided near to where they live. The district needs to attract and retain more economically active younger people to provide services and balance the age profile but a housing policy that locates such a large proportion in the north of the district is flawed. Housing and increased economic activity needs to be spread throughout the district.

6.2.4 There is a particular need to address the imbalance that already exists whereby residents in the southern area of the district do not look to Horsham town for their primary shopping and leisure but to Worthing and Brighton. This results in a loss to the local economy which requires a positive response. A new town in the south of the district would not only provide the necessary housing but generate long term economic benefits and bring a better economic and social balance to the district.

6.2.5 The proposal to create a huge orphan community attached to the north of Horsham would have a proportionately damaging impact on the environment. It would be highly detrimental to the setting of the town within the surrounding countryside and the amenity of its citizens. The environmental impact of additional traffic on already congested routes would be much more significant than if the development were dispersed more widely.

6.3 Ensuring the vitality of town centres

6.3.1 The preferred strategy fails to ensure the vitality of Horsham town centre with its proposal for a large superstore in the North Horsham development adjacent to the A264. The fact that the developer is insisting on this being built in the earliest stage demonstrates that it is in no way designed to meet new demands but will instead be in direct competition with Horsham town centre retailers. This is contrary to the NPPF and to the Council’s own Horsham Town Plan SPD which says it will *‘ensure that piecemeal development opportunities in out-of-town locations do not undermine the long-term vitality of Horsham town centre’*.

6.4 Promoting sustainable transport

6.4.1 The proposed North Horsham development will only be accessible by road as the proposed parkway station is highly unlikely to be built. Suggestions that pedestrian and cycle access across the A264 will be improved are irrelevant as the town centre would be too far away to walk into and the existing roads are narrow, with no scope for widening, and not cycle-friendly.

6.5 Conserving and enhancing the natural environment

6.5.1 Large bolt-on strategic sites clearly have a much greater detrimental impact than smaller sites or dispersed development.

6.5.2 The Council has failed adequately to set out plans to positively create, protect, enhance and manage the district's network of biodiversity and green infrastructure; specifically it has failed to identify and protect the green spaces (large and small) within Horsham town. The preferred strategy fails to identify and formally reaffirm the importance of the strategic gaps between Horsham and Crawley and Horsham and Southwater.

7 Conclusion

7.1 The draft strategy is fundamentally flawed and there are better options available. We ask therefore that:

- the draft preferred strategy be scrapped and the process started again
- the flawed policy of very large strategic sites bolted on to existing settlements be dropped
- no significant development be permitted north of the A264
- a proper assessment is published of all brownfield land within the district (including Horsham town) and its suitability for housing
- work is resumed urgently on the creation of a new town
- the Mayfield new town proposals are given serious consideration
- housing development and business space is spread more evenly throughout the district
- an assessment is published of all green spaces (particularly within Horsham town) and appropriate protection afforded to them
- proper steps be taken to ensure the prevention of further settlement coalescence through the reconfirmation of the strategic gaps between Horsham and Crawley, and Horsham and Southwater; the creation of New Green Belts or other steps that would achieve this objective.