

BigSTAND

An Objection on behalf of BigSTAND

A formation of resident's associations from Adversane, North Heath, Broadford Bridge, Marringdean Road, Pulborough and Billingshurst.

www.bigstand.co.uk

Dear Councillors,

Horsham District Council Local Plan

Objection to New town on Land at Adversane, West Chiltington Parish

(Kingswood) SA 597

I am writing on behalf of BigStand, a formation of residents' associations who have come together to oppose the proposal to build 4,000 homes in open countryside at Adversane.

We represent in excess of 1,000 local residents from all social backgrounds and ages from Adversane, Broadford Bridge, West Chiltington, North Heath, Pulborough and Billingshurst.

In submitting our response to Horsham District Council, we make reference to the following documents:

- Horsham District Local Plan
- Interim Sustainability report
- Draft Infrastructure Delivery Plan
- Pulborough Neighbourhood Plan
- Billingshurst Neighbourhood Plan

We object in the strongest possible terms to the inclusion of Site SA597 on the grounds that the proposal does not conform with 12 of the 14 relevant Strategic Policies and 7 out of 10 Spatial Objectives.

In particular, we raise the following concerns:

- The proposals do not allow for any significant improvement to existing infrastructure and will result in unacceptable pressure on already overburdened road and rail links.
- The site will not make any significant contributions to local employment or economic growth, whilst adversely affecting existing businesses in Billingshurst.

- The lack of any significant employment opportunities will result in the residents commuting by road to Horsham and Crawley and other local towns.
- It will further “stretch” existing health care services, with the nearest A&E Units being located over 16 miles away in Worthing and Chichester
- It will destroy 150 ha’s of precious countryside and reduce the “green gap” between Billingshurst and Pulborough, whilst adversely impacting the environment
- The proposal is not in accordance with Horsham’s own Development Hierarchy Framework
- The developers’ suggestion that the settlement will be sustainable, lack credibility and do not stand up to scrutiny.
- The new settlement will lack of social cohesion and result in the exclusion of the elderly
- Given the current economic downturn there has to be a question mark over deliverability

Infrastructure – Impact on transport links

Adversane is a tiny settlement, situated in open countryside around a staggered junction at the meeting of two single carriageways. The existing road layout has remained essentially unchanged from since before the industrial revolution.

A new settlement, such as is proposed at Kingswood, requires a considerable amount of infrastructure. Apart from the re-routing of a short length of the B2133, the proposals make no reference to improvements to the A29 or other local roads.

Spatial Objective No. 6 states that development should be supported by infrastructure and Paragraph 6.16 of Horsham District Local Plan both acknowledge the huge amount of infrastructure required to support strategic development and confirms that the District has no control over delivery times.

The Draft Infrastructure Delivery Plan makes no provision for a new settlement, such as is proposed for Adversane.

According to RAC figures and Government National Traffic Survey data 2018, 3,500 houses equates to 7,000 extra people and 4,900 additional cars. Each person makes on average 602 car trips per year which equates to 4,214,000 additional car trips each year from this development.

That is in addition to the journeys created by the new Harwoods industrial area, waste collection, post and home deliveries.

The main north south route between the south coast and London is the old Roman road 'Stane Street', the A29. This road is already very busy, experiencing congestion during peak hours. West Sussex County Council has confirmed there are currently no proposals to upgrade this road, other than the improvements proposed in the Bognor Regis / Littlehampton area.

The B2133 is the principal east - west route, giving access to Guildford and the A3 to the west and the A24 to the east. There is a "single file" bridge at Newbridge (approx. 1½ miles to the north) that suffers from both flooding and congestion. Councillors will be aware that Newbridge is a 'listed' monument.

The additional 4,900 private vehicles together with additional commercial vehicles would place almost intolerable strain on an already overburdened road network, with the impact being felt in Pulborough, Billingshurst, Wisborough Green and Storrington as well as the surrounding hamlets. This is in direct contravention of paragraph 3.19 of the HD Local Plan which states that development must not create pressures on existing infrastructure.

The developers are proposing to re-route the B2133 and create a new roundabout close to Brinsbury College. This would create a "pinch point" which would result in further congestion and would adversely affect the air quality of the area. It should also be noted that roundabouts do not work well if unequal volumes of traffic enter on different arms.

It would be extremely difficult for drivers of slow-moving vehicles such as horseboxes and tractors to join either the A29 or B2133 from smaller roads and very difficult and dangerous to turn right onto the A29.

The provision of automatic traffic signals at that junction may not be acceptable as Adversane is a Conservation Area and the green is registered as Common Land.

Residents living along all the local roads would be significantly affected by noise and pollution from the increase in traffic. As there are few existing pavement the risk to pedestrians and cyclists would increase exponentially, particularly during the winter months when visibility is poor,

Paragraph 3.3 of the Local Plan states that 40% of residents commute out of the area for work. Despite the claim by the developers that the settlement would be largely self-contained, there is no evidence that the proposed employment opportunities would even meet this figure.

The site is located well outside the "Gatwick Diamond" and as there is a low likelihood of numerous well-paid employment opportunities, it is therefore, reasonable to assume high levels of commuting by car to areas of economic activity such as Crawley and Mid Sussex.

This is in contravention of Strategic Site development principle No1, which states that "development should be designed to minimise reliance on the private car travel.

Spatial Objective 10 – Objective: to minimise carbon emissions."

The developers have stated their intention to increase the ability to walk and cycle to and from the new settlement. This is not a viable option as almost all the existing roads do not have any footways and dangerous for cyclists, particularly after dark, on account of their narrow width and high number of vehicles.

Residents would have to resort to cars for longer journeys, especially given the very limited local bus service.

The only mitigation offered by the developers is that they would provide charging points, encourage car clubs and enhance the existing bus service. Clearly, they have no control over the take up of by the residents of those facilities, and we contest the validity of these claims. The fact that the developers have suggested a car club demonstrates that they know there will be a high volume of commuting.

Railway Services:

There is already considerable pressure on the existing railway stations at Pulborough and Billingshurst (The Arun Valley Line), exacerbated by the recent residential developments in the area. The shortage of parking is particularly problematic and is noted in Pulborough and Billingshurst Neighbourhood plans. Even another 100 train travellers at each of those stations would be difficult to absorb. Residents will have difficulty parking or getting a seat on the train.

This will make Billingshurst, Christs Hospital, Horsham far less desirable places to live and deter people from buying properties in this area. There are no current plans to build a new station, nor any land set aside for one.

The Arun Valley Line joins the main Brighton to London line at Three Bridges – this line currently suffers from capacity issues, particularly at East Croydon.

The “slow” line that passes through Dorking and Sutton is also understood to have capacity issues north of Dorking where South West trains join the line.

Summary:

Any reference in the Interim Sustainability Report to access to improved transport should be disregarded. We do not accept the current scoring in that report.

The lack of both existing and proposed infrastructure renders this proposal unsustainable.

Infrastructure – Impact on education and health services

All of the local schools, both primary and secondary, are understood to be at capacity. The advertising material of the developers, Our Place, describes the intention to build a “through school”. However, there is no reference to this in the local plan which only states the developers will contribute towards primary education. In any case, a critical mass of children would be necessary before the commencement of building a new school, resulting in many years of families having to travel by vehicle to schools further afield. The slow build out for this proposal would render it extremely unlikely that a new school would be forthcoming within the plan period, and there is no reference as to who is going to finance the cost of building a school. The only reference to secondary education is that there are “strong links to Brinsbury College”. Brinsbury is not a secondary School and the number of prospective new residents taking up places there will be negligible.

Health Services in Pulborough and Billingshurst are already overstretched, with people having to wait weeks for appointments. Whilst reference is made in the plan to the provision of a “wellbeing” centre there is no guarantee that this would be built, staffed or financed by the local primary care trust. No detail is provided in relation to what such a wellbeing centre would be comprised of. Paragraph 1.25

of the Interim Sustainability Report comments that uncertainty is attached to the scores considering the potential for existing healthcare facilities to be overburdened as a high amount of development is delivered. Significantly, paragraph 1.76 of the Interim Sustainability Report describes Scenario 3b, which would include Adversane, “...as being the least certain to provide health facilities due to the slow build out proposed”.

There is not a single mention in this provision of provision of housing or services for the elderly, something we find troubling given the growth in that demographic. This is in contravention of Strategic Policy 20, which calls for provision of retirement housing.

Summary:

Given that there is no guaranteed provision for education or health, nor provision for the elderly, we strongly disagree with the Interim Sustainability Report's assessment in relation to provision of services, the scoring of which should be reduced.

Economic growth and employment opportunities – SUSTAINABILITY.

BigSTAND acknowledges the requirement for economic growth but believes it should be balanced by appropriate environmental constraints.

Our position is that irreparable damage will be caused to character of Adversane and the surrounding area, without any material benefit resulting from the new settlement. Indeed, we believe, many existing businesses in Billingshurst will be adversely affected. This is a concern that HDC have themselves highlighted.

We do not believe that meaningful employment will be delivered. Strategic Policies 6 and 7 and Spatial Objective Nos 1 and 2 are therefore not met.

Paragraph 6.37 of the HD Local Plan states that development should provide new employment opportunities through employment land. Whilst the developers have stated their intention to provide one job per home, they have not provided any detail, much less evidence of how this will be achieved.

Using housing densities published by the Ministry of Housing, Communities and Government, 4,000 jobs equates to 3 million square feet of warehousing, 2 million square feet of light industry or 0.5 million square feet of office space, (equivalent to the size of The Gherkin).

Even assuming some residents work in the proposed new units at Brinsbury as well as the proposed high street shops, together with the requirement for cleaners and waitresses at the proposed country club, this does not equate to 4,000 quality jobs. It is hard to envisage the creation of any roles that would attract the salary necessary to buy anything but the most basic of houses. The average non commuting earnings in this area is c £24,000 pa.

Even with two earners per household, new residents would be unlikely to be able to purchase properties in excess of £250,000. This means that for the majority of the proposed housing, at least one person per household will 'out commute'. Again, this contravenes Strategic Site Principle no 1.

The Interim Sustainability report points out that new settlements can have a long lead in time and they need to be a certain size to achieve a critical mass in terms of jobs, services and facilities. Paragraph 1.135 of the Interim Sustainability

Report, specifically acknowledges that employment opportunities may not be as substantial at Adversane, given the lower amount of development to be provided within the plan period.

It should be considered also, as the Country heads into a period of economic instability, exacerbated by the current Covid – 19 Epidemic, there is no guarantee that small businesses will be able to obtain the investment to “start-up” new business on site or that potential buyers will obtain offers of mortgages.

This is confirmed by the Accountability Report which confirms developments may not be delivered during an economic downturn. Whilst this is equally true of each of the proposed sites, where this differs in relation to Adversane is that an extensive area of attractive countryside would be lost, the climate damaged and existing residents put to unnecessary discomfort and stress, whilst at the same time the resulting development would be too small to be self-sustaining.

There would be less of a negative impact if new development was adjacent existing larger settlements. This is confirmed by the Interim Sustainability Report which concludes that spatial strategies that focus development at existing settlement are likely to be most sustainable in terms of access to jobs, services and facilities and public transport, and therefore also help to limit carbon emissions.

Summary:

We state that the developers’ claim to produce one job per household is unlikely to be delivered and should be disregarded as part of this application. This factor makes the proposal to build a new town at Adversane **Unsustainable**.

Comments on Individual Policies

We strongly dispute the reference in the Interim Sustainability Report with reference to SA 17. We assert that it would make far more sense to support development close to existing jobs, such as Horsham or Crawley.

There are numerous references in the local plan to the fact that new development must not be to the detriment of existing businesses.

For example:

1) Spatial Objective no. 3 seeks to protect the viability of smaller market towns and rural centres

2) Paragraph 5.41 of the Local Plan states that the Council will seek to protect the character of existing retail centres and paragraph 5.34 points out the challenge of maintaining a retail offer in smaller towns

3) Paragraph 5.10 states that new developments should not threaten smaller businesses, whilst Paragraph 5.33 states that no one element of the District’s centres should impact negatively on another.

4) Paragraph 5.45 states that proposals for small scale retail development, must not undermine the vitality of the nearest village centres.

The proposal to build a new town with its own High Street could adversely affect businesses in nearby Billingshurst. The proposed new town would, in fact be the same size as Billingshurst. Having two towns of the same size in such close

proximity would be detrimental to both, but particularly to Billingshurst which already has a number of units in its High Street that have been empty for years.

5) This proposal fails to comply with Strategic Policy 12 – retail hierarchy.

Paragraph 5.40 states that applications for retail development outside of town centres require a retail impact assessment. There is no evidence that any such impact assessment has been carried out in relation to this new proposal.

6) The same is true of the proposal in Our Place's advertising material to build a Country Club and Hotel. We note that this does not feature in the local plan but does feature in the "panel". This would have an adverse impact on existing sites such as Billy's, The Chequers Hotel, the Country Club at Slindon and would clash with the Pulborough Neighbourhood Plan which proposes to build a hotel at the Toat Car Wash site (previously developed land).

7) Paragraph 4.15 also states that Broadbridge Heath may get a hotel and leisure complex. The suggested demand for another hotel in the area is not proven.

8) Paragraph 5.26 states Horsham's aim to increase overnight trips to capitalise on traditional landscape. A 150ha housing estate cannot be described as traditional landscape and is a self-defeating prospect. There would be nothing to attract people to stay there.

9) Strategic Policy 11 specifically states that proposals (for tourism) MUST relate well to surroundings, avoid harm to the townscape or landscape character and the wider environment.

10) Paragraph 5.9 states that the focus should be on retaining current Key Employment Areas and allowing them to expand. In relation to businesses other than retail and leisure, The Pulborough Neighbourhood Plan suggests an expansion of the existing business park at Broomers Hill. This would negate the necessity for further business units at Brinsbury and would have less of an impact on open, undeveloped countryside. Office space at the Novartis site and North Horsham will meet the demand for office space in the district, there is no need to create more at Brinsbury.

11) Adversane is not a Key Employment Area. In Fact, the Horsham District Capacity Assessment for 2014 assessed the whole of the area proposed for development as having low to moderate capacity for employment – something which is noted in the Interim Sustainability Report. Nothing has changed materially since that report. Harwoods will attract only a negligible amount of new jobs, it is mainly for the relocation of existing roles and should not be included in the figures for this proposal. We assert that new development should be based near to Horsham or Crawley to take advantage existing jobs.

12) Paragraph 5.19 of the HD Local Plan states that any development outside of settlements must contribute to farming enterprises and/ or promote recreational enjoyment of the countryside. It MUST demonstrate that it will not adversely affect character, appearance and beauty of the countryside and wider area. There is no evidence that this development will contribute to farming enterprises, quite the reverse. It is destroying 150 ha of Grade 3 agricultural land that has been used for grazing for centuries. The development will adversely affect local farmers who need to move livestock in the area. Thus, Strategic Priority 8 – rural economic development – is not complied with.

11) The surrounding countryside is currently enjoyed by hikers, cyclists and horse riders, many of whom are attracted to visit the area by its unspoilt nature and far reaching views. The development will not only result in the loss of footpaths through beautiful countryside within the proposed development area, it will completely ruin the view from surrounding vantage points. The whole area will be affected. Thus, it will be detrimental to tourism and deny people the right to enjoy leisure time in the countryside.

Adversane forms a key part of the one of the most important Neanderthal sites in Western Europe. Beedings Castle above North Heath was the site of a Neanderthal encampment and Adversane was an important hunting area for the settlement being in line of site of the encampment. If the development goes ahead we will lose a critical perspective on Neanderthal life and practices.

For all of the above reasons, we say that there is no evidence that this development will generate significant economic growth, it will actually detract from local businesses and be detrimental to local tourism. We reject outright the assessment in the Interim Sustainability Report that the Adversane site will contribute to economic growth.

Comments on Development Hierarchy

Strategic Priority 2 deals with the Development Hierarchy. The Horsham District Local Plan makes clear that the priority for development, for new homes, jobs, facilities and services is to be Horsham with a strict hierarchy thereafter for development of smaller towns and villages.

Paragraph 3.23 states that development and expansion should take place in and adjoining our most sustainable villages. Adversane is not one of those villages. The proposal to build 4,000 homes on the boundary of the tiny conservation area' hamlet of Adversane is nothing short of perverse. It is not simply the ruination of the countryside that we object to, (although that is a major consideration), for this is not being proposed as a standalone project, the fact that it abuts the built up area boundary of Adversane makes it an expansion of an existing settlement.

Paragraph 4.6 of the HD Local Plan classes Adversane as a secondary settlement, something we dispute. Adversane is a cluster of historic buildings surrounding a road junction. It does not meet the criteria of a secondary settlement. There are no facilities apart from a Public House.

There is no "sense" of having left the open countryside and arrived somewhere. Adversane is a designated conservation area under the Planning (Conservation and Listed Buildings) Act 1990

Paragraph 3.25 deals with expansion of smaller settlements, stating they could accommodate a very small level of development – not a new town of 4,000 dwellings.

It also states a balance must be struck in order not to fundamentally alter local character. Whether it is classed as a secondary settlement or an unclassified settlement, there can be no denying that a large-scale development would obliterate the surrounding countryside and permanently and irrevocably ruin the character of this historical conservation area.

This is in direct contravention with Spatial Objective No.7-to safeguard and enhance the character of settlements and ensure that the distinct character is retained.

In relation to the expansion of secondary settlements, the Local Plan allows for small scale organic growth – not the imposition of 4,000 homes and 7,000 residents.

Paragraphs 4.8 and 4.14 set out the exact circumstances in which expansion of secondary settlements will be supported. Those conditions include being entirely within the existing boundary (which this clearly is not), be limited in scale, have no significant increase in activity including narrow, rural roads, be proportionate to the scale and function of the settlement, the landscape character must be retained or enhanced, and it must meet an identified local housing need. This proposal meets none of these. We contend that Strategic Objectives 2 and 3 – Development Hierarchy and Settlement Expansion are not complied with.

There is no evidence of a need for another 4,000 homes at Adversane or Billingshurst, which has recently experienced a huge amount of development. If part of the rationale is to house the Crawley overspill, then the proposed site at Ifield would be far more appropriate as the residents would be close to family, friends and employment.

Strategic Policy 17 states that evidence of local needs will normally be in the form of a local housing needs assessment prepared specifically for that parish or ward. We are not aware of any such assessment in relation to Adversane. We object to the proposal for a new town in this remote rural area, which is completely at odds with the development hierarchy and which would change the character of this very small, ancient settlement. We recommend development close to large existing settlements, as per the hierarchy.

Impact on the countryside and historical character of settlements Paragraph 3.11 of the local plan states that the vision for Horsham is that by 2016 the district will have retained its rural identity and the villages their separate and distinctive characters, yet in recent years 60% of development has been at the expense of “greenfield” land.

Paragraphs 3.17 and 4.9 also refer to the need to safeguard and enhance the character of settlements and maintain the rural character outside of settlements. Spatial Objective no 8 is to preserve the unique landscape character and ensure new development minimises the impact on the countryside.

The destruction of 150 ha's of prime countryside will result in the area at Adversane being completely urbanised and will destroy its rural nature. This is indirect contravention of Sustainability Appraisal objective 7 – to conserve and enhance the character and distinctiveness of the district's landscapes.

Paragraph 1.27 of the Interim Sustainability report acknowledges that a significant negative effect has been identified for this site. It is also worthy of note that the site has been assessed as having a low landscape capacity for large scale employment and housing. It is difficult to conceive how the evidence in that Landscape Capacity Assessment might have changed in the last five years.

Adversane, a designated conservation area with its rich heritage of historic buildings, will lose its separate and distinctive character, being subsumed into a

modern housing development. This is in contravention of SA Objective 8 – historic environment.

The green space between Billingshurst, Pulborough and West Chilmington will be significantly and irreversibly reduced. This, in turn, will lead to further erosion of the space between settlements as objections to future development on the grounds of minimising the impact on our countryside will no longer be relevant.

The Local Plan acknowledge the beautiful nature of our countryside and our rich heritage contribute to the economic competitiveness and attractiveness of the area. It is an economic draw, as recognised in paragraph 3.19. To destroy that countryside is not only a tragedy in its own right, but it is completely counter productive to the aim of increasing tourism. We will not attract tourism if we destroy our environment.

Steepwood Farm is a wonderful and precious example of unspoilt rolling ancient Wealden countryside with open grassland, ponds, mature hedgerows and ancient woodland. The creation of a few green spaces and planting a few new trees is no mitigation for the loss of wildlife and habitat that we will be responsible for if we allow this new town to go ahead.

The site currently has good through visibility and, importantly, is overlooked by a number of vantage points. It is a view enjoyed by walkers and which attracts visitors to the area. Those countryside views will be completely destroyed for miles around

There has been no impact assessment on climate change. We note the intention to build to climate change standards, however this does not compensate for the destruction of 150 ha's of greenfield, hedgerows and mature trees. The building of 4,000 homes on prime countryside is in direct contravention of paragraph 2.10 which sets out that one of the central tenets of the Corporate Plan is to protect the environment.

Although the Plan states that Horsham should be a great place to live, the proposals have no regards to the quality of life for existing residents.

Adversane falls within the Bat Sustainance Zone associated with the Mens Special Area of Conservation. Of particular concern is the effect that development in this area would have on the Barbastelle Bat and Bechstein's Bat.

The site is also home to a variety of wildlife, including barn owls, nightingales, newts, deer and many other species.

We contend that building new settlements in open countryside is significantly more harmful to wildlife than expanding existing settlements. This is because wildlife has already adapted and moved back from existing settlements whereas, a new settlement will destroy whole ecosystems and stable habitats.

The Interim Sustainability Report acknowledges that medium and large development will have particularly adverse impacts in relation to flooding, owing the large amount of impermeable surface and loss of greenfield. This may be exacerbated by the recent decision not to provide flood defences at Wisborough Green, which is upstream from the proposed site.

The area proposed for development is currently extremely quiet and peaceful. In addition to noise pollution emanating from vehicles and the shops and business,

the proposed sports pitches and the proposed Country Club would both be extremely disturbing to local residents. Noisy events, fireworks, public address systems are not compatible with a farming environment and would inflict unnecessary suffering on our livestock and wildlife.

Paragraph 1.35 of the Interim Sustainability report confirms that development of such a large site would increase overall traffic in the area, which is contravention of SA Objective 13 – reducing need to travel by private vehicle. The huge increase in car journeys would have an adverse effect on air quality.

This is acknowledged in paragraph 1.36 of the Interim Sustainability report, which highlights the significant negative effect of development at Adversane, as the increased levels of traffic would pass through AQMA, exacerbating existing air quality issues. This is in contravention of SA objective 14 – limiting air pollution.

Paragraph 1.22 of the Interim Sustainability Report makes clear that building in close proximity to existing services and sustainable transport links is the most effective way of reducing private car journeys. Adversane is not well related to the existing settlements in Horsham. We note that, of the three new settlement proposals, Mayfield has the potential to outperform Adversane in limiting carbon emissions and supporting sustainable energy systems.

Adversane currently enjoys excellent dark skies. Dark skies are another factor which draws people to the District. The amount of ambient light pollution that would emanate from a new town would completely destroy those dark skies. This would be exacerbated if lighting was installed on the A29 to cope with the increase in traffic. The value of dark skies was acknowledged when granting the Harwoods planning application at Brinsbury, as the amount of light they would be allowed to show at night was specifically controlled under the consent granted. Once again, this completely wrecks our rural way of life.

There is a high potential for pollution from litter from fast food outlets in the High Street.

Social Cohesion:

The marketing material from developers 'Our Place' suggest that this development is aimed mainly at young people and families. We note that the District Plan suggests that 60% of new housing need in the District is required for older inhabitants.

There is very little mention of provision for the elderly, a factor we find surprising given the projected growth of that demographic.

The slow build out proposed will result in development which wrecks the countryside without providing any material benefit to the existing residents. The development will be too small to be completely self-sustaining, and yet our roads, schools and services will be negatively impacted. There will be little integration with existing residents and no need for new residents to contribute to the wealth or activities of Billingshurst that help to form a sense of community.

Indeed, the plan is for them to be within walkable distance from their own high Street.

We note the intention to build a Country Club. Whilst no specifics are given, Dominic Richards, the Director of Our Place, is the owner of a members only Country Club in Suffolk. Given the high number of affordable homes proposed, this would presumably not be something many residents could afford, potentially leading to a sense of class divide.

It is acknowledged in the Interim Sustainability Report that sudden large-scale growth is not conducive to social cohesion. This is particularly the case where affordable housing is prioritised to people from outside the local area. It is our opinion that this development would not be conducive to social cohesion, either in itself or in relation to the existing community.

Deliverability

Contrary to the statement in the Local Plan, Our Place do not appear to have a record of delivery of a project of this nature. The recently appointed Chief Executive, Development Officer and Finance Officer have previously delivered shopping malls in the Middle East or worked on the Battersea Power Station Project or delivered very small residential projects. They have never delivered a new town in the countryside.

We assert that this should be taken into account in the sustainability assessment.

CONCLUSION

Horsham District advises its aim is to create “ A place where people from all backgrounds can choose to live and work, with access to high quality jobs, services and facilities that are close to home, in a low carbon economy that is in harmony with the natural environment.”.

Proposal SA597 meets none of the above criteria and it is not compliant with the overwhelming majority of the Council’s own Strategic Policies and Spatial Objectives.

Strategic Objective No1 calls for Sustainable development. It states the council will make a presumption in favour of development unless “any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits”.

In our submission we have shown that the adverse effects overwhelmingly outweigh the potential benefits. It should also be understood that the proposal does not enjoy local support.

We believe that building new settlements in open countryside is not the way to provide the new homes that the District needs. We believe that there are other sites that will be better placed to deliver sustainable homes in the Horsham District and we therefore urge Horsham District Council to remove the Adversane, West Chiltington Parish (Kingswood) site from the ongoing Local Plan review.
