



30<sup>th</sup> March 2020

Horsham District Council  
Strategic Planning  
Chart Way  
Horsham  
RH12 1RL

Dear Sir / Madam,

#### **HORSHAM DISTRICT COUNCIL LOCAL PLAN REVIEW REGULATION 18**

We set out below our representations to Horsham District Council's Regulation 18 consultation on the Draft Horsham District Local Plan 2019 – 2036 (the **Draft Local Plan**). These representations are made by Homes England in its role as the Government's housing accelerator, and as a majority landowner and promoter in relation to land identified as Land West of Crawley in the Draft Local Plan.

#### **Purpose of Representations**

Pursuant to Regulation 18 of Town and Country Planning Act (Local Planning) (England) Regulations 2012 these representations are made in respect of the Draft Local Plan and set out Homes England's position in so far as the Draft Local Plan is relevant to Land West of Crawley. Homes England endorses and supports the identified opportunity to bring forward and plan positively for a long-term strategic growth opportunity for a minimum of 10,000 homes on Land West of Crawley.

Within the current Draft Local Plan, Land West of Crawley comprises Site SA101 (with capacity for a minimum of 3,250 homes) together with SA291 West of Kilnwood Vale. These sites form part of a larger strategic growth opportunity area for a minimum of 10,000 new homes.

Whilst the starting point for any allocation should be on the basis that sites SA101 and SA291 will be delivered early in the next plan period to meet identified housing needs, the consideration of the longer-term ambition is important and is therefore strongly supported by Homes England. Homes England considers that a significant opportunity exists to identify Land West of Crawley as a strategic allocation of 10,000 new homes, supporting infrastructure, employment and community facilities that would collectively comprise a "garden town". Although site SA101 is capable of functioning as a standalone site that can be master planned so that it is consistent with adjacent allocations, Homes England considers that significant additional benefits can be achieved by way of a wider strategic allocation for 10,000 homes. Rather than incremental, ad hoc, standalone allocations over time, it is considered that a single large allocation now, to meet

needs for the long term, is capable of being much more than the sum of its parts. In its role as housing enabler, Homes England can help facilitate delivery of that wider public benefit.

Following discussions with other landowners and key delivery partners, Homes England considers that there is a compelling case for including Land West of Crawley in a strategic allocation within the Draft Local Plan for at least 10,000 new homes, recognising that the comprehensive delivery of the scheme will go beyond the plan period.

Within this context it is necessary to clearly distinguish between (A) the first phase of development within SA101; and (B) other development parcels which can deliver early and wholly within the Plan period; and (C) the wider opportunity that will be delivered outside the plan period. We therefore consider the allocation should be considered as follows:

- a) Allocation of Land West of Ifield (SA101), providing early comprehensive delivery of homes, employment space and supporting infrastructure during the plan period as a first phase.
- b) Allocation of other land within the Land West of Crawley where this can deliver early against the vision and objectives for a new sustainable garden town.
- c) Allocation of the remaining Land West of Crawley, providing long term strategic development opportunity for at least 6,000 additional homes as part of a comprehensive garden town that has the potential to become a national exemplar for sustainable development.

Site SA101 should be identified as the first phase of the wider 10,000 unit allocation, but if a 10,000 unit allocation is not considered appropriate at this time, Site SA101 would function as a standalone site whose development is consistent with the later development of the wider area if that is then thought appropriate.

These representations therefore set out:

- The role of Homes England and how it can work in partnership with Horsham District Council to ensure identified housing needs and wider objectives of the Draft Local Plan can be met.
- Homes England's support for Land West of Crawley being allocated for 10,000 new homes and why this is considered to be an optimal outcome in terms of the overall benefits that can be realised from such an approach;
- Homes England's support and rationale for the allocation of Land within SA101 as the first phase of a larger strategic development opportunity on Land West of Crawley (or if a 10,000 unit allocation is not considered appropriate at this time, SA101 would function as a standalone site whose development is consistent with the later development of the wider area if that is then thought appropriate);
- Homes England's support and rationale for Horsham District Council to provide a larger strategic allocation within the Local Plan that enables the comprehensive planning for long term growth for a garden town on land West of Crawley. This recognises the

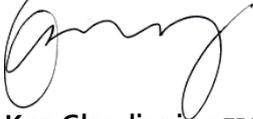
opportunity for such development to provide a long-term sustainable solution to meeting future needs of the North West Sussex Housing Market Areas, the Gatwick Diamond and North West Sussex Functional Economic Areas.

- Suggested amendments and / or additions to draft policies where these will help support the draft vision and objectives and ensure they meet the soundness tests set out in the National Planning Policy Framework (NPPF) (paragraph 35).

Where necessary, these representations refer to the supporting evidence base published alongside the Draft Local Plan.

Please contact me if you would like to discuss any points raised in this submission. In the meantime, I look forward to further engagement and would be grateful if you could continue to keep up us informed in relation to the HDCLPR and progression towards Regulation 19.

Yours faithfully,



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Homes England

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## Annex A: Homes England Representations on Horsham District Draft Local Plan 2019 – 2036 (Regulation 18)

### 1. How Homes England can help support the objectives of the draft Local Plan?

- 1.1 Homes England is an executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government. Homes England has the aspiration, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, Homes England is assisting in the delivery of new homes and is helping to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition. These include local authorities, private developers, housing associations, lenders and infrastructure providers. Within the next few years, Homes England will have invested over £27 billion across our programmes.
- 1.2 Homes England has a strong track record in acting as a 'master developer' on large housing-led schemes such as the Northern Arc in Burgess Hill and Northstowe in Cambridgeshire. In the case of Burgess Hill, Homes England acquired the site, which had been identified as a location for major housing delivery for over 10 years but had stalled due to the complexities of land ownership and the need for upfront strategic infrastructure delivery. Homes England worked closely with Mid Sussex District Council, the landowners and the site promoter to acquire the land. At the Northern Arc, Homes England is investing in the required infrastructure to secure early release of the first phases of development before the first homes are built.
- 1.3 Homes England is deploying our knowledge and delivery expertise to ensure that development on land within our control comes forward to meet local ambitions, meeting identified local housing needs and supporting wider sustainability and economic objectives.
- 1.4 As a Government Agency, working in partnership with Horsham District Council, Crawley Borough Council, West Sussex County Council and other delivery partners, Homes England has a range of mechanisms to assist in the delivery of a new sustainable new garden town on Land West of Crawley, including:
  - **Unlocking land** – a commitment to using our existing land holdings and using our funding programmes to unlock land within SA101. Within our Strategic Plan 2018/19 – 2022/23, we are committed to bringing forward land to deliver Land West of Ifield in the first five years of the Plan period and will continue to proactively address land assembly issues within the wider garden town area if required. If necessary, Homes England has compulsory purchase powers through the Housing and Regeneration Act 2008 and would consider the use of such powers as a last resort where necessary in the public interest.
  - **Unlocking investment** – a commitment to investing in infrastructure upfront, ensuring that new homes are delivered alongside by the necessary facilities, services and infrastructure. Working with delivery partners we will ensure a range of investment products are available to support housebuilding and infrastructure delivery - including more affordable housing and homes for rent.

- **Increasing productivity** – using the scale of development at Land West of Crawley to support the housebuilding construction industry to overcome challenges in terms of productivity, workforce, skills and materials. This includes supporting skills for future workforce, as well as using new technologies such as modern methods of construction to ensure accelerated delivery rates are achieved.
- **Delivering market resilience** – using the scale of development at Land West of Crawley to support smaller builders and new entrants, while promoting better design and higher quality homes.
- **Supporting local areas** – providing support to Horsham District Council to provide confidence in the delivery of a new garden town West of Ifield – helping to create and deliver more ambitious plans to get more homes built. In bringing forward important community infrastructure, we are exploring how early delivery can also help address current requirements within existing communities.
- **Delivering home ownership products** – ensuring a new garden town at Land West of Crawley maximises the opportunities for shared ownership and rent to buy, amongst other government sponsored programmes including new First Homes.

1.5 Homes England’s commitment to the above within the context of development to the Land West of Crawley is confirmed in its Strategic Plan in terms of the delivery of infrastructure and the first 200 homes by 2022/23.

## 2. Land West of Ifield [SA101] – providing early comprehensive delivery of homes, employment space and supporting infrastructure as a first phase

2.1 Homes England is promoting SA101 as the first phase of a new sustainable garden town. SA101 has capacity for a minimum of 3,250 homes, supporting employment and infrastructure. Homes England envisages this as the first phase of the larger strategic allocation comprising some 10,000 new homes, albeit SA101 is capable of functioning as a stand alone site if a larger strategic allocation is not considered appropriate. Through its recent public consultation<sup>1</sup>, Homes England has set out a clear commitment for the development West of Ifield to:

- Deliver a sustainable new community in line with garden town principles that reduces the need to travel;
- Develop a landscape led masterplan that provides for at least 50% open space and a minimum 10% net gain in biodiversity;
- Meet the identified housing needs within the North West Sussex Housing Market Area – including delivering a policy compliant level of affordable housing and providing a

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<sup>1</sup> Homes England is committed to engaging the community in the design and planning process throughout the project and have undertaken initial engagement through a series of public exhibitions in venues around Crawley and Horsham through January 2020. The engagement events were well attended with a total of 726 members of the community visiting over the eight days. 251 feedback forms were received from the exhibitions, in addition to 305 online forms being completed on [www.westofifield.co.uk](http://www.westofifield.co.uk). Engagement will continue with further events scheduled for later in 2020 to test design ideas and concepts. Further information regarding these events be found online<sup>2</sup> and we will be seeking to publish comprehensive feedback in due course ahead of initial masterplanning.

range of housing types and tenures – including the provision of gypsy and traveller pitches;

- Provide the homes and jobs required to maximise the economic potential within the Gatwick Diamond and North West Sussex Functional Economic Areas – enhancing the local employment offer and providing for start-up and SME business in line with wider strategic economic objectives;
- Provide a climate resilient development that contributes to the achievement of zero carbon through a range of measures, including construction, and is resilient to climate change – including appropriate flood risk management and low carbon and alternative energy sources;
- Deliver supporting infrastructure in timely manner to mitigate the impacts of development and which helps to meet the needs of existing communities;
- Provide a positive local legacy through use of local stewardship and community management arrangements;
- Be futureproofed to support the potential to bring forward a sustainable strategic growth area on the wider Land West of Crawley.

- 2.2 These ambitions are consistent with the Local Plan vision and criteria set out in the **draft Strategic Site Principles detailed under draft Policy 15**. Further detail is provided in Annex B as to how specific principles can be met.
- 2.3 Site SA101 has a long history of being promoted and has previously been assessed through the current Horsham Local Plan. Promotion has always been considered within the context of enabling Horsham and Crawley authorities to meet their housing requirements through the duty-to-cooperate by bringing forward new sustainable communities that meet locally identified needs.
- 2.4 Within this context, Homes England agrees with the observations set out in the HDC SA of Growth Options that acknowledge *failure to provide some level of growth which is well related to Crawley, may fail to best respond to economic realities of the area. Moreover, a strategy which is not well related to Crawley would miss the opportunity to respond positively to the unmet housing need arising from Crawley specifically* (HDC SA of Growth Options, 2020, Para2.5).
- 2.5 Furthermore, as demonstrated by the Site Assessment set out in the Draft Local Plan, site SA101 performs well against the alternative strategic sites, with clear locational and sustainability benefits that include:
- The ability to fully deliver the site within the Plan period, making a positive and substantial contribution towards meeting the identified housing needs within the North West Sussex Housing Market Area – providing the opportunity for Horsham and Crawley councils to work collaboratively to meet unmet housing need identified in CBC Local Plan Review (2020 – 2036);

- The opportunity to maximise the economic potential within the Gatwick Diamond and North West Sussex Functional Economic Areas – helping to deliver against the strategic priorities identified in the emerging C2C Local Industrial Strategy and North West Sussex Economic Growth Assessment Update (2019)<sup>2</sup>;
- The ability to provide a new sustainable community at scale with the potential to deliver significant reduction in household emissions and wider environmental enhancements;
- The opportunity to provide significant new investment in supporting environmental, social and transport infrastructure to mitigate the impacts of development and help meet the needs of existing communities;
- The opportunity through significant investment in infrastructure and high-quality place-making to achieve a step-change in modal shift towards sustainable transport modes;
- The potential to address issues of inequality – especially in relation to housing affordability and access to local services.

2.6 In reviewing the Draft Local Plan, we recommend several instances where revised SA Scores would be appropriate based on the evidence provided within this response. This is provided at **Annex B** to these representations. These changes will impact positively on the Site Assessment scoring, providing further justification as to why Land West of Ifield should be included as a preferred strategic allocation.

2.7 Together, the Site Assessment and the Sustainability Assessment (as amended) demonstrates the significant strategic, locational and sustainability advantages of Land West of Ifield over other potential allocations, and that previous soundness concerns raised through earlier Local Plan examination - and reflected in the current HDC Site Assessment Paper (2018) – can be addressed.

2.8 On this basis, Homes England supports the inclusion of site SA101 as a potential strategic allocation with capacity for a minimum of 3,250 homes as the first phase of a sustainable new community that can help address the challenges set out in Chapters 4, 5 and 6 of the Draft Local Plan. Should site SA101 not be progressed as a preferred strategic allocation within the Regulation 19 consultation, it is considered that potential soundness issues could arise.

2.9 The opportunity for longer term delivery of a new garden town is considered below. It is important to recognise that when SA101 is considered as part of a longer term strategic growth opportunity, the extent of the benefits and opportunity to maximise the sustainability of the scheme through appropriate land uses and infrastructure provision is further enhanced. Commentary to support this position is also included with **Annex B**.

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<sup>2</sup> The EGA 2019 identifies the need for additional employment floorspace to support the continued success of the Functional Economic Area recognising the need to identify wider supply side opportunities within the FEA to support continued economic growth within the Crawley area and the opportunity for Horsham to enhance the quality of its offer for office based employment by complementing existing town centre floorspace through smaller scale, new office developments in smaller locations and settlements elsewhere in the District. The EGA also identifies a number of structural changes – such as the increase in flexible and home working and consolidation of formal space – that need to be provided for so as to fully meet the needs of businesses located within it.

### 3. Can Site SA101 be Developed?

- 3.1 Whilst previous assessments through the plan making process concluded that the site is not 'not currently developable', this was on the basis that there were a number of potential constraints that required further assessment. The previous assessments did not positively identify any actual insurmountable constraints on development.
- 3.2 This is consistent with the findings of the Inspector at the previous Horsham District Plan Examination who concluded (Para 78 – 80) that the site is well located in a relatively sustainable position, that there were no insurmountable issues subject to further technical work being undertaken and that the site should be considered again as part of the HDC Local Plan review.
- 3.3 Homes England has undertaken substantive technical feasibility and site assessment work to proactively address the evidential gaps identified previously and is now able to confirm that there are no constraints or barriers to bringing development forward on the site.
- 3.4 The work undertaken to date to address previous concerns includes:
- **Future Gatwick Airport Expansion** – Homes England are actively engaged with Gatwick Airport Limited (GAL). Notwithstanding this, there is currently no Government policy supporting a new southern runway (with a third runway at Heathrow preferred) and GAL have confirmed their intention to progress a DCO during 2020/21 in relation to the use of its existing standby runway north of the site. Although Crawley Borough Council in its Regulation 19 submission draft local plan has indicated its intention to remove the Gatwick R2 safeguarding area Homes England's proposals for SA101 are consistent with R2 in any event. GAL has also confirmed that the emerging masterplan will not impact on operational requirements (e.g. radar) and regular dialogue will continue to ensure this remains the case. Homes England is committed to taking account of the potential extent of airport growth as set out GAL's published masterplan and future proofing development to avoid any negative impacts. For example, not building residential development within the 60dB contour and identifying necessary design led / other mitigation within the 57dB areas associated with a future second southern runway.
  - **Cumulative traffic impacts and need for Crawley Western Link** – Arcadis, (on behalf of Homes England) has undertaken high level strategic modelling of the wider area using the Crawley Town Model in order to assess several potential growth scenarios (including future Gatwick Expansion). Although further testing needs to be undertaken as part of the HDC and CBC Local Plan reviews, the indicative modelling undertaken by Homes England to date shows that in isolation, a minimum of 3,250 homes west of Ifield is unlikely to require a full link to be delivered **but** is well placed to contribute towards a Western Link particularly if it formed part of a wider strategic allocation west of Ifield for up to 10,000 homes. Consideration also needs to be given to **Policy SD3 of the CBC Local Plan and the North Crawley Area Action Plan** that includes an area safeguarded for the link road recognising that routing and form must be subject to further investigation.

- **Delivery of social infrastructure** – Homes England has engaged with service providers including West Sussex County Council (WSCC) and the relevant Clinical Commissioning Groups (CCGs) in relation to health, education and other community infrastructure provision. These ongoing discussions will identify the necessary requirements to mitigate the impact of development as well as potential opportunities for the development to address extant requirements. This includes the provision of a secondary education site that will help address an urgent need for additional school places in the mid 2020's as well as meeting future demand arising from the development. In addition, two primary schools, a new community hub (including health, leisure, recreation and community uses) and significant areas of publicly accessible open space are allowed for in the emerging masterplan and Homes England is committed to ensuring that they are delivered as early as possible within the development.
- **WwTW Capacity** – Homes England is actively engaged with Thames Water Developer Services over wastewater capacity within the Crawley area and the development is currently being modelled as part of Thames Water's capacity review within the Crawley catchment. While the review is still to be completed, Thames Water has confirmed that technical solutions do exist that can provide adequate capacity for a minimum of 3,250 homes.
- **Land Availability** – as discussed further below, Homes England is actively engaged with all relevant landowners and confirm that land will be within Homes England's control so that the first new homes to be delivered in 2022/23. As a last resort Homes England has compulsory purchase powers that can be used.
- **Flood Risk** – Homes England has been working with the Environment Agency to assess flood risk issues within the site and to identify solutions that meet the requirements of the NPPF, that help to reduce overall flood risk within the site as well as for existing at-risk properties along the River Mole and Ifield Brook. A comprehensive flood risk and surface water drainage strategy is being developed that meets these objectives and further detail will be made available during 2020 following discussions to finalise this.
- **Landscape impact** – detailed Landscape Impact Character Assessments have been undertaken to identify opportunities and constraints within the site and protect areas of greatest landscape value. These assessments are being reviewed to take account of the recently published HDC Landscape Capacity Study (2020) and will form the basis of a landscape led masterplan.

#### 4. **Can Site SA101 be delivered?**

- 4.1 As set out above, Homes England has an extensive track record of delivering strategic development sites. The early delivery of homes and infrastructure on site SA101 is a specific priority in Homes England's Strategic Plan 2018/19-2022/23<sup>3</sup>. This provides a commitment from Homes England to progress the promotion of a strategic growth area for a minimum of 3,250 new homes as part of a comprehensive approach to master planning and place making. This is alongside a public commitment to begin major infrastructure work and start construction of the first homes on the site by 2022/23.

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<sup>3</sup> <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223>

- 4.2 Homes England already owns the majority of land within site SA101 and has agreed terms and made the necessary arrangements with the remaining landowners to ensure that all land can be brought within the control of Homes England in line with its commitment to deliver homes and supporting infrastructure within the first 5 years of the Plan period, and for site SA101 to be delivered in its entirety over the Plan period.
- 4.3 In line with its delivery approach at Northstowe and Burgess Hill, Homes England's intention is to act as a 'master developer', overseeing the delivery of critical infrastructure and controlling the delivery of the site. Through this approach, Homes England can confirm that the scheme is viable, and that Homes England will assume project responsibility from conception through to implementation, de-risking development opportunities to the level needed for the private sector to invest and build.
- 4.4 As master developer, Homes England will continue to work with HDC and other local stakeholders throughout the delivery stage to ensure high quality design is delivered consistently across the site and that the vision and key objectives of the development are met. Where required, Homes England will work with partners to bring forward the delivery of other infrastructure in order to provide serviced plots for housebuilders to deliver the new homes. In line with Homes England's strategic objectives to accelerate housing delivery, Homes England will work with several delivery partners in order to maximise the number of outlets within the site.
- 4.5 This delivery model provides a much greater level of certainty compared to other potential strategic allocations that the necessary infrastructure can be delivered at the right time and that delivery rates on the site can be maximised.

## **5. Land West of Crawley – garden town strategic opportunity**

- 5.1 In line with the ambition of Para 72 of the NPPF, Homes England has identified and supports the potential for SA101 to form part of the first phase of a wider strategic growth opportunity at Land West of Crawley – for a minimum of 10,000 homes and 10,000 jobs – providing a long term development opportunity that can be delivered in accordance with garden town principles and potentially as part of Government's Garden Communities programme. Whilst Homes England considers that SA101 could come forward as a standalone allocation, we consider that incorporating SA101 for a wider 10,000 unit allocation would deliver greater public benefits.
- 5.2 A definitive boundary for the 10,000 unit scheme is yet to be determined, and a broad "area of search" is being considered. This comprises land located north of the A264 from Faygate in the west and extends in an arc north west towards Crawley, Gatwick Airport and the A23. To the east, the site adjoins the neighbourhood of Ifield, in Crawley and Gatwick Airport is to the north, both of which are key urban influences in this area.
- 5.3 For current purposes, Homes England consider that there are a number of potential options to include within the Plan a commitment to the wider strategic opportunity to ensure there is a strong policy and framework against which the opportunity can be delivered. One option would be to prepare a dedicated joint Development Plan Document with Crawley Borough Council in the form of an area action plan (AAP). Another option could be a requirement for

applicants of any early phase delivery to work with the Council to agree a strategic framework and demonstrate compatibility with it. Whichever option is taken, there will be a need to provide long term certainty to housing and infrastructure delivery across this plan period and beyond, together with the ability to realise the benefits of the wider strategic opportunity West of Crawley.

5.4 The use of an AAP will provide long term certainty to housing delivery across plan periods and beyond, together with the ability to realise the benefits of the wider strategic opportunity West of Crawley.

5.5 The benefits of allocating a wider strategic opportunity for 10,000 new homes include:

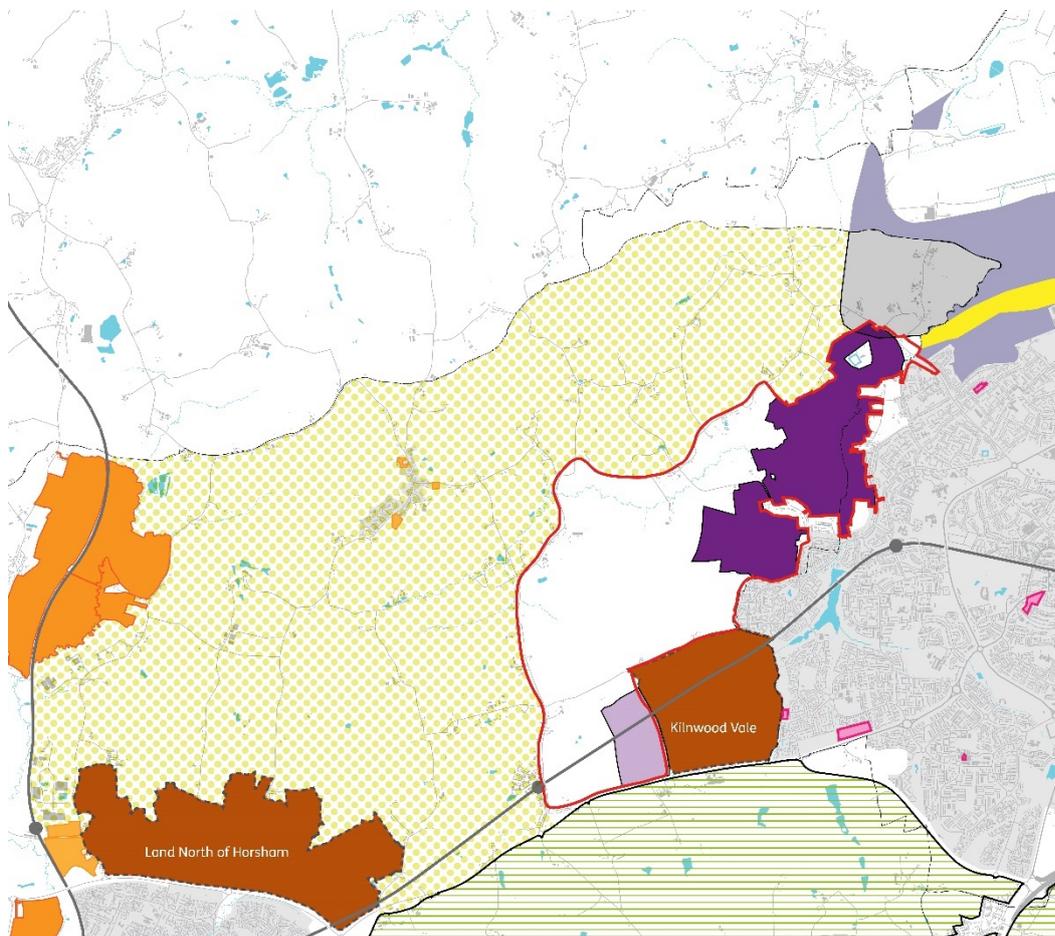
- The opportunity to meet long term housing in a comprehensively planned and sustainable manner – providing clarity around how long-term housing needs for both Horsham and Crawley (in line with the duty-to-cooperate) could be met, integrating with existing communities alongside the delivery of new infrastructure as part of a long-term comprehensive strategy.
- The opportunity to protect areas not suitable for development – providing long-term defensible boundaries and protection against piecemeal development.
- The opportunity to deliver a step change in environmental enhancement – facilitating and support low and zero carbon approaches for wider environmental gains.
- Providing greater certainty on the delivery of strategic transport infrastructure (including the provision of a Crawley Western Link) – supporting the case for significant long-term investment, promoting the use of modern sustainable transport modes and safeguarding the opportunity to adapt to a low carbon future.
- Enabling a comprehensive approach to masterplanning and placemaking to create high quality, well planned places for the future in line with the objectives of the Building better, Building Beautiful agenda.
- The potential for the site to respond to key economic drivers identified in the Economic Growth Assessment Update (2019), making available new employment land opportunities and providing for the workforce needed to establish and grow other nearby employment centres such as Manor Royal, Gatwick Airport, Horsham and Crawley Town Centres that make a positive contribution to the regional and national economy.
- The opportunity to deliver large scale social and community infrastructure and facilities (e.g. schools, health facilities and other community facilities) as part of accessible neighbourhood centres.

5.6 The opportunity for longer term delivery of a new garden town is considered to provide greater benefits and opportunities to maximise the sustainability of the scheme in comparison to other opportunities within Horsham District. Commentary to support this position is also included within **Annex B** to these representations.

5.7 In line with Para 72 of the NPPF, it is considered prudent for HDC to consider the potential for large scale development in this area as part of this local plan review, although recognising that the full development potential will be realised over multiple Plan periods.

5.8 In considering the opportunity for 10,000 new homes, Homes England has engaged positively with major landowners and interested parties. Meaningful discussions have taken place and it is expected that an allocation would compromise land located north of the A264 from Faygate in the west (including SA291 that is identified in the Draft Local Plan as part of the potential West of Crawley allocation) and would extend in an arc north west towards Crawley (SA101) – see Figure 1.

**Figure 1: HDC Site Allocations 101 and 291 within the context of a Wider Strategic Opportunity (Land West of Crawley Garden town)**



#### Key

-  Land to be allocated for Wider Strategic Opportunity (Land West of Crawley Garden Town)
-  SA101 - Land West of Ifield
-  SA291 - Land West of Kilnwood Vale
-  Strategic gap/Landscape Buffer (Preventing Settlement Coalescence)
-  Crawley BC Key Housing Sites (as identified at Reg19)
-  Indicative Search Corridor for a Western Link Road
-  North Crawley Area Action Plan (CBC)
-  Gatwick Safeguarding Zone (HDC)
-  Horsham Smaller Site Potential Housing Allocation
-  Horsham Potential Housing Allocation
-  Horsham Existing Allocation
-  AONB

- 5.9 Subject to the strategic growth opportunity being supported, Homes England will work with the Council, promoters of Site SA291 and other landowners to bring forward a strategic framework (incorporating SA101 and SA291) that meets the long term needs identified in the Strategic Housing Market Assessment (SHMA), in a way that supports the long term economic expansion and success of the Gatwick Diamond and North West Sussex Functional Economic Areas.
- 5.10 To provide the certainty needed for Horsham District Council to confidently take forward a strategic growth area opportunity, the case for an allocation will be supported by a clear strategy as to how the necessary investment in essential infrastructure can be provided that meets future population growth.
- 5.11 As set out above, the allocation and delivery of SA101 as the first phase of a wider 10,000 unit allocation is an important step in realising the wider garden town growth opportunity and will contribute positively to a number of the Local Plan objectives and meet identified housing needs. Similarly, proposed site allocation SA291, or wider allocations in the vicinity of the A264, is also expected to make a positive contribution over the Plan period.
- 5.12 Within this context, and on the basis that there is a commitment from Homes England to support a strategic growth opportunity in this location, it is important and considered appropriate for Horsham District Council to allocate the full garden town comprising 10,000 new homes at this stage in order that:
- HDC and neighbouring authorities can demonstrate how duty to Cooperate requirements can be met;
  - the early phase delivery on SA101 (and potentially SA291) can plan for and be future proofed to ensure they are fully integrated and that the benefits from the wider allocation are maximised;
  - important strategic transport corridors can be safeguarded;
  - the necessary certainty is provided that supports long term investment strategies for infrastructure planning and delivery;

- the necessary certainty is provided that supports the preparation and implementation of key economic strategies – including Coast2Capital LEP Local Industrial Strategy and preparation of the North Crawley Area Action Plan as proposed by Crawley Borough Council ;
- there is a positive basis upon which Horsham District Council, Homes England, landowners and other deliver partners can continue to identify and establish appropriate delivery mechanisms; and
- secure opportunities to protect land outside of the strategic growth area, promoting long term sustainable patterns of development and preventing settlement coalescence in accordance with the objectives of draft Strategic Policy 29.

5.13 To achieve the above objectives and ensure that the HDC Plan is positively prepared and meets the soundness tests set out in the NPPF, it is considered that the HDC Regulation 19 consultation should incorporate a strategy that seeks to:

- allocate sites within the opportunity areas where these can be delivered within the first 5 years and make a positive contribution to meeting identified housing and employment needs (including SA101 and potentially SA291);
- provide clear ambition and commitment to larger scale development West of Crawley that can deliver a sustainable new garden town community with a minimum of 10,000 homes and jobs across multiple plan periods (potentially as part of a wider allocation);
- establish clear guiding principles for the longer-term strategic growth opportunity to guide the design and delivery of early phases allocated within this Local Plan;
- provide opportunities to deliver strategic infrastructure outside of the early Site Allocations where these will assist in their delivery and help realise the potential of the wider growth ambition; and
- should the wider growth area not be allocated at this stage, provide the necessary mechanisms to safeguard the longer-term strategic growth opportunity, ensuring that it isn't prejudiced in the short – medium term.

5.14 As noted above, we consider that there are potentially a number of mechanisms that could be explored to deliver the garden town growth opportunity for 10,000 new homes.

## 6. Specific Comments on Regulation 18 draft polices

6.1 The following representations are presented in the order in which policies are documented in the Draft Local Plan. They include a response to Key Questions posed by HDC where relevant. For clarity these are copied in advance of each representation that follows.

### Chapter 3: Spatial Vision and Objectives - Key Questions

- *Do you agree with the spatial context – is there anything else we should add?*
- *Do you agree with the objectives for the new Local Plan?*
- *Are there any others which you would suggest?*

6.2 Homes England has reviewed the Spatial Vision and Objectives and consider these present an ambitious but realistic set of guiding principles for the Local Plan. No amendments are proposed, and Homes England looks forward to working with Horsham District Council to demonstrate how a Strategic Allocation West of Crawley can make a significant contribution to achieving these ambitions.

#### Chapter 4: Policies for Growth and Change – Key Questions

• *Do you agree with the draft policies in this section? If not, what changes would you suggest?*

6.3 Homes England has reviewed the draft policies and broadly support the text contained within Chapter 4. The following amendment is, however, suggested in respect of **Strategic Policy 3: Settlement Expansion**. Bullet point 5 states one aspect of the criteria that must be met in demonstrating the acceptability of development outside Built Up Area Boundaries (BUAB). It records that development will be supported where '*The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.*' Homes England recommends that this is amended to read: '*The development is contained within ~~an existing defensible~~ justified boundaries and the landscape and townscape character features are maintained and enhanced.*' This amendment is necessary to ensure the policy is both Justified and Effective thus recognising that in developing masterplans that relate to settlement expansion it is in many cases appropriate to establish new boundaries and not only rely on existing ones. In some cases, these may not meet a definition of defensible but remain appropriate to the landscape and townscape character features.

#### Chapter 5: Economic Development - Key Questions

• *Do you agree with the draft policies in this section? If not, what changes would you suggest?*

6.4 Homes England has reviewed the draft policies and broadly support the text contained within Chapter 5. The following observations and amendments are recommended.

6.5 The Northern West Sussex Economic Growth Assessment 2019 that forms part of the Local Plan evidence indicates current employment commitments (such as existing allocations and planning permissions) broadly matches the employment needs generated by a population growth derived from the housing requirements based on the Government's Standard Method (965 dwellings per annum). However, as set out under representations made to **Chapter 6** in respect of **Housing Number Options**, Homes England supports the case for HDC to plan for the higher growth scenarios that seek to accommodate unmet housing needs of neighbouring local planning authorities, and therefore intensification of existing sites and / or additional employment land will be required to meet the future needs in the District over the plan period which could increase the employment requirement overall.

6.6 Furthermore, it will be important that the final spatial strategy (both in terms employment and housing) responds to and, where possible, supports wider strategic economic development strategies within functional economic areas (e.g. Gatwick Diamond Strategy, West Sussex Economic Growth Plan, C2C LEP Local Industrial Strategy and emerging

aspirations of Crawley Borough Council to facilitate significant expansion of Manor Royal through the North Crawley Area Action Plan).

- 6.7 Within this context, Homes England supports in principle the requirement under **Strategic Policy 6: Economic Growth** for all Strategic Allocations of 800 homes or more to provide opportunities for employment and for people to live and work locally. However, Homes England recommends that the following policy text is amended as indicated to ensure appropriate flexibility is maintained for site specific employment solutions that support a clear economic strategy that maximises local, sub-regional and economic potential.
- 6.8 *All strategic site allocations must demonstrate how provision for one job (all Use Classes) for each new dwelling will be provided for within the site or in justified cases within close proximity to the site and accessible via sustainable modes of transport. This could include through evidenced means such as home working, retail and community employment, and general B1/B2/B8 employment opportunities.*
- 6.9 This amendment is necessary to fulfil HDC's duty to ensure the plan is justified and effective, thus recognising that in some instances there are more established and appropriate locations for employment that must be supported by significant housing delivery alongside jobs on site. For example, Land West of Crawley exists within close proximity to the Borough boundary of Crawley and within close proximity to Manor Royal, which is the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond. Policy EC3 of the Crawley Borough Council Regulation 19 Local Plan sets out specific policy to support the continued success of this employment location.
- 6.10 On this basis it is important for HDC Plan Policy to be prepared cognisant of its wider duty to co-operate and recognise the potential for jobs to be provided for within close proximity to site allocations (which may be outside of the HDC boundaries) where an overriding case for offsite provision exists.

## **Chapter 6: Housing – Key Questions: Housing Number Options**

- The work to understand the suitability, sustainability, delivery and infrastructure implications is ongoing and your views on these issues are important to us and will feed into the options that are taken forward for examination.*
  - Which of the housing options above do you think the Council should set as our housing number?*
  - If you think the number should be different to the above what level of growth do you think we should provide. What evidence do you have for this?*
  - What do you consider to be the challenges to this Council in bringing forward the increase in housing development to meet the Governments unprecedented change in housing growth?*
- 6.11 As summarised in the North West Sussex Strategic Housing Market Assessment (2019) under Section 3 'Housing Market Geography and Spatial Relationships' a range of previous studies have considered issues relating to the housing market geography. These have identified a 'Northern West Sussex' Housing Market Area which (as a best fit to local authority boundaries) comprises Crawley, Horsham and Mid Sussex. This has been tested and endorsed at Local Plan Examinations in each of the three areas.

- 6.12 Under Strategic Policy H1 of the CBC Regulation 19 Submission Draft Local Plan there is recognition that despite the draft plan making provision for the development of a minimum 5,355 new dwellings in the borough in the period 2020-2035, there will remain an unmet housing need of approximately 5,925 dwellings arising from Crawley over the plan period. The policy states that CBC will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley.
- 6.13 Homes England therefore strongly encourages HDC to advance Housing Growth Option 3 as detailed under **Strategic Policy 14: Options for Housing Growth**. This option would meet the local housing need and 5% buffer and provide around 400 homes each year to help meet the unmet housing needs of Crawley and the Coastal Sussex area.
- 6.14 The Sustainability Appraisal of Growth Options recognises that allowing for higher growth could support new service provision as well the viability of sustainable transport links in Horsham. It would also be likely to deliver benefits in relation to addressing housing affordability in the plan area as well as contributing to the housing need of neighbouring local authority areas. It can also help to support ambitious economic growth within a nationally important economic area.
- 6.15 Notwithstanding this, the Sustainability Appraisal does identify a number of risks associated with the higher growth scenario including likely demand for higher amount of greenfield land, potential to place development in closer proximity to sensitive environmental receptors, higher value landscape and heritage assets, an increase in the number of private vehicle journeys being made more regularly which will be to the detriment of air quality and the District's contribution to climate change).
- 6.16 At this assessment level, these risks are generic and are assessed on a Borough wide basis. Homes England firmly believes that when considered in relation to individual sites, these risks can be mitigated through site specific masterplanning and mitigation measures and therefore should not be considered as a given when considering the potential to accommodate higher growth levels. In some instances, the opportunities to maximise the benefits from growth and minimise the impacts are only achievable where a sustainable commitment to higher housing growth under option 3 is made.

## Chapter 6: Housing - Key Questions: Potential Housing Allocation Options

- *What are your views on the site assessment process, and the potential development sites that are identified in this and the supporting documentation?*
- *How do you consider these sites would bring forward development that accords with wider sustainable development principles that balances the need for economic growth with social and environmental requirements as identified in the NPPF?*

- 6.17 As set out above, Homes England supports the allocation of SA101 for a minimum of 3,250 homes as part of a wider strategic growth opportunity area for up to 10,000 homes that will help deliver the garden town vision.

6.18 Homes England recognises that HDC needs approximately 1000 homes per annum to meet its own Objectively Assessed Need and that HDC has not yet indicated the extent to which such OAN should be met within Crawley's administrative area. The Draft Local Plan does however envisage that the Site has "the potential to deliver a very significant proportion of [HDC's] housing requirements".

6.19 In addition, CBC is unable to deliver more than about 50% of its current OAN for housing. CBC currently has a 5,925 shortfall in the Plan period. HDC is considering options to meet 200 or 400 of that shortfall per annum (or around 3600 or 7200 over the Plan period). The natural location for that is to the west of Crawley at the Site.

6.20 Making allocations under SA101 and SA291 would be insufficient to make a significant contribution to both CBC's and HDC's AON. In contrast an allocation of 10,000 new homes at Land West of Crawley would assist with the AON for both authorities whilst also providing for future growth beyond the plan period (as part of the comprehensive whole) potentially through to 2050.

6.21 This approach of allocating very large sites to meet needs both during and after the plan period is well-established – and is a recognised (and successful) way of delivering major new settlements giving the landowners and developers an incentive and opportunity to plan, invest and deliver for the whole rather than just incremental parts of the whole.

## Chapter 6: Housing - Key Questions: Strategic Site Principles

- *Please consider the strategic site development principles set out in the draft policy above. We would welcome your views on whether this policy captures all the requirements that new development can provide, or whether there are any omissions. We would also welcome your thoughts as to how the requirements set out in this policy can be practicably achieved and how any obstacles that it may present can be addressed.*
- *Do you think the draft policy captures all the requirements that new development can provide? If not, what would you add?*
- *How do you think the requirements in this policy could be practicably achieved? And how could we address any obstacles?*

6.22 Homes England has reviewed the **draft Strategic Site Principles detailed under Policy 15** and broadly supports the policy wording. However, the following amendments are recommended.

6.23 Under Item 2, the policy states that *Masterplans will be expected to identify key areas of biodiversity enhancement, demonstrating that a minimum of 10% biodiversity net gain can be achieved*. Whilst Homes England is committed to meeting this policy, we request clarification is added to the supporting text or policy wording to define the metric to be used in calculating 10% net gain. We suggest that reference should be made to the Natural England Biodiversity Metric (latest version at the time of writing is 2.0). This is to ensure that the Policy is justified under the tests of Soundness.

6.24 Under item 6, the policy refers to job provision of one new job per home. The wording of the policy is recommended to be re-phrased as follows: *Provide sufficient new employment opportunities through new employment land and through other opportunities to meet the*

*principle of one new job per home within the site or in justified cases within close proximity and accessible via sustainable modes of transport.*

6.25 This amendment is consistent with our comments relating to **Strategic Policy 6: Economic Growth** and is necessary to recognise that in some instances that are more established and appropriate, locations for employment that must be supported alongside jobs on site. This will ensure that the policy can be assessed as being positively prepared, justified and effective.

6.26 Whilst the draft Strategic Site principles are supported, it is considered that as preferred site allocations are confirmed, there will be a need for more specific site criteria-based policies for each of the Strategic Sites to be taken forward. In the absence of any intention or commitment at this stage to prepare subsequent Local Plan Documents to guide development on the strategic allocation, the inclusion of site specific policies will provide the necessary policy framework and guidance for promoters, landowners and developers to bring forward proposals at the earliest opportunity. This policy(ies) should include sufficient detail to inform the comprehensive masterplanning and delivery of Land West of Crawley as a whole, including reference to potential land assembly and delivery mechanisms (such as the use of Compulsory Purchase Powers) that provides certainty around delivery.

#### **Chapter 6: Housing - Key Questions: Affordable Housing**

- *Do you consider that, if supported by viability evidence, the target for providing affordable housing on housing sites should be increased? If so, what % of affordable housing should the Council be seeking?*
- *Should the Council seek to use the threshold for affordable housing of 10 dwellings on all sites? Are there occasions when it may not be appropriate and if so, what should the threshold be?*

6.27 Homes England is committed to delivering a policy compliant level of affordable housing that meets the needs identified in the North West Sussex Strategic Housing Market Assessment. However, at this stage and in the absence of the Local Plan Viability Assessment (currently being prepared) Homes England does not consider it appropriate to conclude whether a variation to the target percentage of affordable housing is appropriate this stage. Homes England note the possibility to increase this target up to 50% is being considered through the viability testing. Homes England will comment as the evidence is presented for consultation.

6.28 As the Government's housing Agency, Homes England do, however, commend the commitment that HDC will pursue alternative and innovative ways to deliver a range of housing tenures in partnership with local registered providers including market, affordable and social rent. Homes England also recognises that HDC is embarking on direct delivery of affordable housing through a housing company as well as referencing opportunity for Community Land Trusts (CLTs). Homes England has significant expertise in a range of affordable housing tenure and delivery models and would be keen to ensure this policy and the outcomes of the Viability Testing is considered with full appreciation of the opportunities and support for different delivery models. These are shared ambitions and should SA101 be progressed as a preferred site, there are opportunities for Homes England and HDC to work in partnership to ensure this ambition is realised.

## Chapter 6: Housing – Key Questions: Gypsy and Traveller Accommodation

- *Do you agree with the draft policy on Gypsy and Traveller sites? If not, please give details as to why not or how the policy could be changed.*
- *In terms of meeting the identified need for Gypsies, Travellers and Travelling Showpeople, do you agree with the approach of intensifying existing authorised sites, if required, in addition to identifying several strategic and non-strategic sites?*
- *If possible, do you think that the Council should allocate all identified need on several new sites? Should these all be strategic (800 dwellings +), or a range of large and smaller sites?*

6.29 Homes England recognises the requirements of Strategic Policy 15, Point 4 for all Strategic Sites to provide a range of housing types and tenure, including provision for Gypsies and Travellers.

6.30 Homes England has previously responded to the Gypsy, Traveller & Travelling call for sites exercise between 3 June 2019 and 30 August 2019. Under this response we stated that Land West of Crawley could accommodate up to 15 Gypsy, Travellers or Travelling Show people pitches. This was calculated using the DCLG Guidance note: Designing Gypsy and Traveller Sites Good Practice Guide (May 2008). Whilst this has been withdrawn, it provided a useful starting point in terms of the sizing pitches which are proposed to extend to 750m<sup>2</sup>.

6.31 Pitches could be delivered as an integral part of the comprehensive development with essential infrastructure and community facilities in close proximity.

6.32 With regard to **Policy 24 - Gypsy, Traveller and Travelling Showpeople Accommodation** Homes England agree with the commitment for Council will meet the identified current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople in Horsham District but do not consider it our position to comment in the spatial distribution of such sites.

## Chapter 7: Conserving and Enhancing the Natural Environment – Key Questions

- *Do you agree with the draft policies in this section? If not, what changes would you suggest?*

6.33 Homes England has reviewed the draft policies and broadly support the text contained within Chapter 7 The following observations and amendments are recommended.

### Strategic Policy 29: Settlement Coalescence

6.34 The broad objectives of Policy 29 are supported. It is for HDC to determine the most appropriate mechanism to meet the aims and the objectives. Whilst the opportunity for Green Belt designation is noted, there may be other policy mechanisms – such as the use of locally designated Strategic Gaps or Local Green Spaces that could also have role in meeting these objectives.

6.35 Whatever mechanisms are chosen, it is important that they do not prejudice or frustrate the long-term delivery of sustainable development especially in relation to larger strategic sites where sustainable development opportunities will be realised over multiple Plan periods.

6.36 Notwithstanding the above, as a minimum **Strategic Policy 29: Settlement Coalescence** should be amended as follows under criteria a and b.

- a) There are no significant effects arising from a reduction in the openness and 'break' between settlements
- b) It does not generate negative or harmful urbanising effects within the retained 'break' between settlements, including artificial lighting, development along and/or the widening of the roads between the settlements, and increased traffic movements.

6.37 These amendments are necessary to ensure that the policy is justified and effective in accordance with the supporting text which provides *"that recognises that several proposals have been submitted to the Council for consideration as locations for strategic housing growth. A number of these are in the key locations which have been identified as being most sensitive for their potential for settlement coalescence. Whilst no final decisions have been made as to whether these sites should be allocated, the sites are in locations where there has been sustained pressure for development"*.

6.38 Without the above amendments important strategic sites that will naturally have impact upon existing gaps could fall foul of the strategic policy. Homes England considers that the criteria must therefore focus on no negative or harmful impacts arising. Specifically, in relation to proposals on Land West of Crawley, Homes England acknowledges that the potential impact on this landscape area will need to be carefully considered taking account of the local value of the area for local residents.

6.39 Recognising that there are several areas of historical importance on the western edge of Crawley and elsewhere, we will have due regard to the updated Landscape Capacity Assessment (2020) as proposals for SA101 and the wider area become more developed.

6.40 **Strategic Policy 31: Green Infrastructure and Biodiversity** should be amended under point 4 as follows: *Development proposals will be expected to remove invasive species and will be required to contribute to the enhancement of existing biodiversity and deliver, as a minimum, a 10% net gain through the delivery of appropriate on-site biodiversity net gain or, where this is not practicable, to off-set the delivery to the Nature Recovery Network or using alternative land in the district if in control of the applicant and meets biodiversity objectives.*

6.41 This amendment is necessary to recognise that the policy as drafted may mean that landowners cannot use their own land for biodiversity off-setting. It should be recognised that if multiple land ownerships are held by a single landowner and land is within the HDC planning boundary, then this could be a valid approach to biodiversity net gain objectives.

## Chapter 9: Climate Change and Flooding – Key Questions

- *Do you agree with the draft policies in this section? If not, what changes would you suggest?*

6.42 Homes England has reviewed the draft policies and broadly support the text contained within Chapter 10. The following observations and amendments are recommended.

## Strategic Policy 39 – Sustainable Design and Construction

6.43 The broad objectives of Policy 39 are supported. The following amendments are proposed to enhance the effectiveness of its wording. Measure (a) should be re-worded as follows:

a) Development should minimise energy used through construction, minimise embodied energy in materials chosen, and minimise construction and demolition waste and utilise recycled and low-impact materials;

## **Chapter 10: Infrastructure, Transport and Healthy Communities – Key Questions**

- *Do you agree with the draft policies in this section? If not, what changes would you suggest?*

6.44 Homes England has reviewed the draft policies and broadly support the text contained within Chapter 10. The following observations and amendments are recommended.

### **Policy 44 - Gatwick Airport Safeguarded Land**

6.45 Homes England recommends that the wording of this policy is updated to directly reference CBC Regulation 19 Local Plan Strategic Policy SD3: North Crawley Area Action Plan which acknowledges that at this stage there is no robust evidence that justifies the continued safeguarding of land for Gatwick Airport expansion. This follows Gatwick Airport Limited (GAL) having confirmed (29th August 2019)<sup>4</sup> the process is now underway for the submission of a Development Consent Order (DCO) seeking permission to bring its northern runway alongside the main runway by the mid-2020s.

6.46 Whilst at this stage Homes England accepts and acknowledges that the Regulation 19 draft CBC local plan proposals will continue to apply the same protections of the previous safeguarding policy to the area identified in the Gatwick Airport Masterplan 2019 until the AAP is finally adopted, such work (to commence within three months of adoption of the Local Plan) should also (as part of the duty to cooperate) ensure that land within HDC is appropriately considered. This amendment is necessary to ensure that the Draft Local Plan remains positively prepared.

6.47 It is also noted that there has been no update to the strategic transport modelling or Infrastructure Delivery Plan. Once the spatial strategy is finalised and preferred Site Allocations are confirmed, it will be necessary to update these to identify infrastructure requirements and identify appropriate delivery and funding mechanisms alongside viability testing work.

## **7. Summary and Conclusion**

7.1 We hope that the above, sets out the clear ambition of Homes England that Land West of Crawley comes forward as part of a wider scheme that will deliver 10,000 new homes, which in turn will contribute towards the Government's objective to accelerate the delivery of new homes.

7.2 There can be no doubt that SA101 should be allocated for at least 3,250 new homes. SA101 can clearly function as a standalone allocation. However, it is Homes England's clear view that significant benefits can be derived from an allocation for 10,000 new homes for Land West of Crawley, with SA1010 comprising the first phase.

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<sup>4</sup> <https://www.gatwickairport.com/business-community/future-plans/long-term-plans/>

- 7.3 By progressing a strategic site that can deliver early and in their entirety within the next Plan period, Horsham District Council will be able to address the significant and immediate housing, employment and environmental challenges within the North West Sussex Housing Market Area.
- 7.4 At the same time, there is a once in a generation opportunity for Horsham District Council, working in partnership with Homes England to plan positively to realise the unrivalled long term potential for land West of Crawley to deliver large scale, sustainable development that maximises social, environmental and economic opportunities for existing communities and future generations.

## Annex B: Reference - Interim Sustainability Appraisal of Growth Options: Horsham District Local Plan: Reg 18

Homes England has undertaken a review of the SA scoring applied to SA 101: Land West of Ifield. Homes England requests that this is considered when undertaking review of all Strategic Sites and identifying preferred locations for growth in advance of Regulation 19 Plan review.

For reference the SA scoring matrix is copied below.

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
=/- or +/-	Mixed minor or significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	++	<p>Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. It is proposed that the site would deliver 3,250 dwellings within the plan period, largely within the Horsham District, but also partially within the administrative area of Crawley Borough. The site is expected to delivery more than 10,000 dwellings beyond the plan period over 35 years. The site will deliver at least 35% affordable housing as part of development.</p> <p>A significant positive effect is expected for the site in relation to this SA objective due to the contribution to the area’s identified housing need, including affordable housing. The close proximity of the</p>	<p>Homes England agrees with this rating, but the following changes need to be considered:</p> <ul style="list-style-type: none"> <li>- The proposed allocation is for a minimum of 3,250 homes – which can be the first phase of a wider strategic allocation. 10,000 homes can be delivered within the wider opportunity, but this land is not currently identified in its entirety in the Reg18 draft.</li> <li>- the site will deliver wholly within Horsham District but is well placed to contribute towards the unmet housing need of Crawley as part of duty to cooperate requirements.</li> </ul>	No revision to score but additional text to be included to reflect full benefits of the scheme	Site will continue to score significant positive (++) with increased potential to deliver enhanced levels of affordable housing / full range of housing types and tenures in accordance with needs identified in North West Essex SHMA. Allocation or safeguarding as part of this Local Plan will increase likelihood of outcomes being achieved as these can inform future discussions relating to land assembly and delivery.

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
		site to Crawley means that it could potentially contribute to unmet housing need within that local authority			
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	++?	The site is greenfield and therefore there are no existing services and facilities within the site. The site is not within walking distance of any town centres locations in the District or Crawley Town Centre which is to the east. However, it is adjacent to the urban edge of Crawley and within close proximity of several neighbourhood centres within this settlement including those at Ifield, West Green and Langley Green. The neighbourhood centre of Gossops Green is also within 800m of the site, but pedestrian access is more limited to this area due to the presence of a railway line. The site is also located within close proximity to multiple education facilities and healthcare centres within Crawley. As such,	Homes England considers that the Uncertainty attached to this SA score should be removed for the 3,250 first phase as it relates to the concern that the close proximity of this large site to Crawley could potentially result in existing facilities becoming overcapacity. Homes England is committed to an infrastructure first approach with local services and community facilities being delivered early in the development phasing to as to serve new and existing communities and to ensure there are no adverse impacts on existing facilities. It should also be noted that new services / facilities within the development will be able to be accessed by the existing communities as well as new residents	++	The assessment correctly identifies the opportunity for additional facilities to be provided in the longer term as part of a larger strategic growth opportunity. While further work is required to determine the exact services within the longer term development at this stage, it should be recognised that a development of a minimum of 10,000 homes will have the capacity to accommodate a wider range of higher order facilities which would further reduce the need to travel and well serve both future and existing facilities. Through a commitment to the larger scale development within this Local

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
		<p>residents in the early stages of development are likely to have access to some services and facilities.</p> <p>As part of the development, the site proposes to deliver two primary schools and early years facilities, one secondary school (with 6th form), a health and wellbeing centre and retail provision including a pub and restaurant/café.</p> <p>These provisions are expected to be delivered during the plan period and would contribute to the accessibility of services and facilities in the area. In the long term, during the 35-year period over which the entirety of the site is to be built out a total of five primary schools and early years facilities and six secondary schools are expected to be delivered at the site.</p>	<p>which will have a positive impact on the sustainability of existing communities.</p> <p>Recognition should also be given to proximity of the site to rail access as well as the ability for development at this scale to support the implementation new bus services and other sustainable transport links that will improve access to existing facilities. This locational advantage will ensure good sustainable access to high order settlements and services within Crawley and Horsham Town Centres.</p>		<p>Plan review, the greater opportunity there is to explore how some of these larger scale facilities could be accommodated within the first phase.</p>

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
		<p>A significant positive effect is expected for the site in relation to this SA objective considering the existing services and facilities which are accessible from the site and the proposals at the site which deliver a range of additional provisions. Uncertainty is attached to the effect considering that the close proximity of this large site to Crawley could potentially result in existing facilities becoming overcapacity.</p>			
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	+?	<p>The site is not within a 40% most socially deprived area. As such, there is limited potential for the site to contribute to local regeneration.</p> <p>The site is located adjacent to the existing urban edge of Crawley and is in close proximity to a number of neighbourhood centres in the town. As such there is potential for the new development and services provided to complement existing uses and</p>	<p>Homes England considers that development at Land West of Crawley will have significant positive impacts on social inclusion and strengthening community cohesion.</p> <p>It should be noted that while not within an area of deprivation as per IMD 2019 ranking, the site is adjacent and in close proximity to areas that are – especially in terms of access to services and housing metrics where there are,</p>	++	<p>Within the wider strategic growth opportunity, the ability to further improve social inclusion and community cohesion is strengthened through the delivery of increased housing that meets identified long term need alongside a greater range of local services and community facilities.</p>

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
		<p>contribute to the vitality of these existing neighbourhood centres.</p> <p>As such, a minor positive effect is expected for the site in relation to this SA objective. The effect is uncertain as the impact of delivering new services and facilities will be dependent in part on their phasing which is unknown at this stage.</p>	<p>significant housing affordability issues, higher % of households in rented accommodation and other identified barriers to accessing the housing market. Given that the strategic location of the site means that it can help meet the needs of both Horsham and Crawley, the site therefore has a significant role to play in helping to address deprivation issues and make a positive contribution to social community cohesion and diversity.</p> <p>In addition to the local neighbourhood centres identified in the assessment, the proximity of the site to Ifield Rail station and the opportunity for development at this scale to secure improved access to sustainable transport into larger scale centres, there is greater opportunity than currently assessed for the site to contribute positively to wider regeneration objectives – such as those for Crawley Town Centre.</p>		<p>Greater certainty around future population growth will help service providers plan for future service provision, increasing the likelihood that improved services or investment in local services / facilities may be realised earlier – helping to realise a greater number of social benefits earlier.</p>

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
			<p>Developing links into existing neighbourhoods through sustainable modes of travel as well as providing facilities that are expected to provide for existing residents as well as new will significantly enhance the potential for social inclusion and community cohesion.</p>		
<p>SA 4: To support the creation of safe communities in which levels of crime, antisocial behaviour and disorder and the fear of crime are reduced.</p>	<p>0?</p>	<p>The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.</p>	<p>Homes England as master developer will be using the Building for Life 12 Criteria as a checklist for the quality of placemaking both at the masterplan stage and through subsequent reserved matter applications. <i>Criteria 9 'Streets for All' recommends Designing homes that offer good natural surveillance opportunities; carefully considering the impact of internal arrangement on the safety and vitality of the street<sup>21</sup>. Consider maximising the amount of glazing to ground floor, street facing rooms to enhance surveillance opportunities creating a stronger</i></p>	<p>+</p>	<p>It is expected that a similar approach to design will be applied to the larger scale opportunity and therefore the overall score will be similar for both the first phase and longer terms development.</p>

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
			<p><i>relationship between the home and the street.</i></p> <p>The Building for Life criteria will be supplemented by a detailed, site specific design guide(s) similar to that prepared by Homes England for its strategic development sites at Burgess Hill and elsewhere.</p> <p>Homes England is confident therefore that as a minimum it can be accepted that a minor positive effect can be recorded at this stage and development will support the creation of safe communities in which levels of crime, antisocial behaviour and disorder and the fear of crime are reduced.</p>		
SA 5: To improve public health and wellbeing and reduce health inequalities.	++/-- ?	There are several health centres to the east within walking distance of the site in Crawley as well as multiple outdoor and indoor sports facilities. There are also multiple PROWs in the	With a commitment for the scheme to be delivered in accordance with garden town principles, Homes England considers that development will have a significant positive impact on public	++/-	The overall opportunities to provide for healthy lifestyles and promote health and wellbeing within the larger strategic opportunity are

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
		<p>area that provide access to the surrounding countryside. There is potential for these existing assets to contribute positively to resident's health in the new development by increasing uptake of physical activity.</p> <p>The site takes in the Ifield Golf Club and development could lead to the loss of this facility. However, as part of development, the site proposes to deliver approximately 50% green space, parts of which could be used by residents for recreational purposes. A health and wellbeing centre is proposed for delivery at the site.</p> <p>Part of the northernmost part of the site is located within the noise contour for Gatwick Airport. The site promoters plan to locate housing and education facilities to the south</p>	<p>health and wellbeing as well as reducing healthy inequalities. Building on Homes England's success and lessons learnt from bringing forward its strategic development at Northstowe as an NHS Healthy New Town, there are opportunities to replicate similar measures within the overall masterplan west of Ifield.</p> <p>Homes England is committing to working with the CCG to ensure that an infrastructure first approach to help ensure that necessary health services are provided at the right time.</p> <p>The development, in accordance with emerging HDC Strategic Policy 15 – Strategic Site Development Principles as well as CBC Policy H3g the development will deliver 50% open space as well as a 10% net gain in biodiversity as well as promoting walking and cycling ahead of other transport modes – promoting</p>		<p>broadly consistent with those for the first phase.</p> <p>However, a commitment to a larger scale development now could enable the masterplan process and service providers to think about long term requirements – presenting an opportunities to deliver larger scale improvements or improvements earlier in the Plan period then may otherwise be the case – e.g. improved countryside links / larger scale open spaces could be provided for.</p>

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		<p>of the site to avoid impacts of aircraft noise on residents. However, there may still be potential for negative impacts from aircraft noise particularly considering the potential for growth at Gatwick in the future.</p> <p>Overall, an uncertain mixed significant positive and significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain as the high number of homes to be provided at the site could result in the potential for existing healthcare facilities to become overburdened.</p>	<p>active lifestyles and providing access to outdoor recreation activities.</p> <p>The potential impact from Gatwick is noted, however this assessment refers to the potential impact from a southern runway expansion of Gatwick which is not currently supported by the Government and does not form part of GAL's current expansion plans. As correctly stated in the assessment, sensitive development will be located outside of the identified noise contours with any residual effects fully assessed through Environmental Assessment with additional mitigation provided if required. A detailed constraints maps (Annex C) has been prepared using detailed sites assessment and survey work to show the potential developable area within the SA101 taking account of all relevant constraints.</p>		

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			It should therefore be assumed that the development will have mixed significant positive and minor negative effects at this stage – although it the opportunity to mitigate the impacts at more detailed design stages should be acknowledged.		
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.	--?	The southern half of the site is located within Impact Risk Zones (IRZs) for two SSSIs (House Copse and Buchan Hill Ponds). However, these IRZs are for industrial/aviation planning applications and not for residential use, office use or any of the other provisions associated with the development proposals. There is a large Local Wildlife Site (Ifield Brook Wood and Meadows) in the eastern half of the site, which the site promoter has indicated would be protected as part of development. The site is also adjacent to several	In accordance with emerging HDC Strategic Policy 15 – Strategic Site Development Principles, Homes England is committed to a landscape led approach that will protect and enhance the most important landscape and habitats within the site (including Ifield Brook Meadows) – with at least 50% of the land area retained as open space. Together this will ensure that adequate protection can be provided for wildlife with important corridors and habitats maintained and enhanced.	+	<p>The opportunity to identify habitats and potential environmental protection at a more strategic scale – increasing the potential to maximise the environmental benefits and ensuring that the wider wildlife corridors and wider habitat connectivity can be addressed.</p> <p>Planning at scale also increases the potential to avoid development on or close to the most sensitive environmental</p>

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		<p>areas of Ancient Woodland and there is an area of deciduous woodland priority habitat adjacent to the watercourse that passes through the site.</p> <p>A significant negative effect is expected for the site in relation to this SA objective considering that there is a local designation within the site and areas of Ancient Woodland adjacent to the site. The greenfield land take within the site may result in increased habitat disturbance as well as potential for fragmentation and loss. There is also potential for recreational pressures, increases in noise and light as the site is occupied. However, the effect is uncertain as the site proposals include provision and enhancement of Green Infrastructure. These measures could help to mitigate</p>	<p>A detailed constraints maps (Annex C) has been prepared using detailed sites assessment and survey work to show the potential developable area within the SA101 taking account of all relevant constraints, including important ecological features.</p> <p>There is a commitment for a minimum 10% net gain in biodiversity while recreational pressures can be effectively managed through the proposed community led stewardship and management arrangements. While some of these are already sought through the draft strategic site principles (Policy 15), there are opportunities for this wording to be strengthened or for additional requirements to be introduced through Homes England’s proposed site specific strategic policies that would ensure the required level of protection and / or enhancement is secured.</p>		<p>areas and to put in place sustainable management arrangements that maximise the long-term benefits.</p> <p>Therefore, a commitment to the larger strategic growth opportunity at this stage will allow for a comprehensive masterplanning process realises the full environmental benefits from the site and help avoid piecemeal or fragmented approaches long term.</p>

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		adverse effects on the natural environment.			
SA 7: To conserve and enhance the character and distinctiveness of the District's landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.	--?	<p>Land to the west of Ifield has been assessed in the Horsham District Landscape Capacity Assessment. The site is comprised of a number of Local Landscape Character Area (LLCAs) with varying degrees of landscape capacity.</p> <p>The land in the south of the site which in close proximity to the urban edge of Crawley (the Land West of Ifield Brook, Rusper Road and Ifield Golf Course LLCAs) has been identified as being of low-moderate or moderate landscape capacity for large scale housing development and low-moderate capacity for large scale employment development. Land within the River Mole LLCA within which the northern portion of the site falls has been identified as having no/low landscape capacity for</p>	<p>The findings of the Horsham Landscape assessment are noted. However, it should be recognised that within the assessment itself (Para 1.7 and 1.8) the limitation of the assessment in terms of confirming the suitability of development and that "<i>Ultimately, the overall suitability of a site for development will depend on a range of other considerations</i>". The assessment also recognises the generality of the assessment and the opportunities that exist for sensitive landscape-led design and appropriate mitigation to overcome potential capacity constraints.</p> <p>Whilst the uncertainty scoring addresses this in part, this is an important consideration for SA101 where landscape capacity varies considerably across the site and it should be recognised that there is a commitment</p>	--/+?	<p>There are similar concerns about how landscape capacity is presented within the context of the wider strategic growth opportunity – i.e. large areas are identified as having no/low capacity without more detailed consideration of local features or opportunities for impacts to be mitigated through a comprehensive masterplan led approach.</p> <p>A commitment to the larger scale development at this stage as part of the wider strategic growth opportunity provides the greatest potential to avoid the most sensitive landscape features and ensure that development is directed towards areas with greatest</p>

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		<p>large scale residential or employment development.</p> <p>As such, a significant negative effect is expected for the site in relation to this SA objective as there are substantial areas of the site where it is unlikely that residential or employment development could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.</p>	<p>to undertake further landscape character assessment to build on the 2003 District Landscape character assessment and more recent Landscape character assessment contained within the HDC Landscape Capacity Study 2020 and prepare a landscape-led masterplan to take account of this.</p> <p>As the masterplan for the site develops, it will be possible to demonstrate how the most sensitive landscape areas can be protected so as to maximise the capacity for housing development and for this to be considered against the wider benefits of the scheme. A detailed constraints maps (Annex C) has been prepared using detailed sites assessment and survey work to show the potential developable area within the SA101 taking account of all relevant constraints</p>		<p>capacity and that appropriate mitigation can be provided at a strategic scale where necessary.</p> <p>In line with the objectives of Draft Strategic Policy 29 the identification of a long terms development area will also assist in identifying appropriate long term, defensible boundaries that fully account for the areas of highest landscape value.</p>

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			<p>Therefore, at this stage it is considered the scoring should be revised to record an uncertain mixed significant negative and minor positive effects likely – and for this to be revised through the next stages of Plan preparation as further information on the masterplan emerges.</p>		
<p>SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District’s historic environment.</p>	<p>--</p>	<p>The north-eastern part of the site overlaps with around half of Ifield Conservation Area, which contains multiple Grade II listed buildings and the Grade I listed Parish Church of St Mary. The majority of listed buildings within the Conservation Area lie</p>	<p>We acknowledge that there are a number of areas of historical importance on the western edge of Crawley – including Ifield Village Conservation Area and a number of listed buildings including a Grade I Listed church. Homes England will be undertaking a</p>	<p>-</p>	<p>As with the landscape capacity considerations, it is considered that a commitment to the larger scale development at this stage as part of the wider strategic growth opportunity provides the greatest potential</p>

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		<p>outside of site boundaries with only one Grade II listed building (Old Pound Cottage) lying within the site boundaries on Rusper Road. The northernmost part of the site encircles a Scheduled Monument (Medieval moated site at Ifield Court). There are two Listed Buildings adjacent to the south-east boundary of the site. Further designated assets within 500m of the site include a cluster of Grade II Listed Buildings to the south-west and several Grade II Listed Buildings to the west.</p> <p>As well as nationally designated heritage assets, the site is also in close proximity to Locally Listed Buildings. The Barn Theatre lies within the site boundaries and there are six further Locally Listed Buildings in close proximity to the site within Ifield Conservation Area.</p>	<p>detailed understanding of the landscape character, setting and heritage appraisal that ensures we are able to respect the setting of Ifield Village Conservation Area and other special features.</p> <p>A detailed constraints maps (Annex C) has been prepared using detailed sites assessment and survey work to show the potential developable area within the SA101 taking account of all relevant constraints</p> <p>In the absence of detailed masterplanning at this stage we consider it appropriate to record a Minor negative effect likely at this stage but would expect to demonstrate that minor positive effects could be delivered through more detailed design. There are opportunities for this to be secured through stronger wording of Strategic Policy 15 or for additional requirements to be introduced through Homes</p>		<p>to avoid the most sensitive historical features and ensure that development is directed towards areas with greatest capacity and that appropriate mitigation can be provided at a strategic scale where necessary.</p>

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		<p>In addition, the majority of the site is located within a West Sussex Archaeological Notification Area (ANA) in relation to the Iron Ore industry and Medieval Moated Site, Rusper.</p> <p>The Ifield Conservation Area Statement (2018) states that the Conservation Area's rural setting contributes strongly to its character and that the surrounding fields and open space within and adjacent should be protected from development that would be out of scale with the existing character. There is potential for development at the site to result in impacts on the existing character and setting of the Conservation Area. As such, a significant negative effect is expected for the site in relation to this SA objective.</p>	<p>England's proposed site-specific strategic policies that would ensure the required level of protection and / or enhancement is secured.</p>		

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SA 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.	-	<p>The site is located on greenfield land. The majority of the site is comprised of grade 4 agricultural land with some smaller areas of grade 3 agricultural land also within the site.</p> <p>A minor negative effect is expected for the site in relation to this SA objective considering that the site is greenfield land which is primarily classed as being of grade 4 agricultural quality.</p>	<p>In recognition that the majority of development is on greenfield location of low agricultural value, no revision to the scoring is suggested.</p> <p>Soils during the construction phase will be managed in accordance with the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites? This considers soils as a resource</p>	No revision	<p>Consideration should be given to how the long-term strategic growth opportunity can have a positive impact on this SA objective long term.</p> <p>While the majority of the wider site is greenfield of lower value agricultural use, providing long term certainty around future growth could help protect other greenfield areas of higher value while still prioritising development on brownfield land within the existing built up areas.</p>
SA 10: To conserve natural resources, including mineral resources in the District.	--?	The whole of the site is located within a Mineral Safeguarding Area (MSA) for Brick Clay and therefore a significant negative effect is expected due to the potential for development to result in the sterilisation of finite mineral resources. The effect is uncertain as	In line with the Mineral Safeguarding guidance set out by West Sussex County Council, a Minerals Resource Assessment will be undertaken to demonstrate that any potential resource will not be unnecessarily sterilised. In advance of this assessment being undertaken, it is considered that the	0	There is unlikely to be any additional advantages / disadvantages in relation to the strategic growth opportunity.

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		there may be opportunities to extract mineral resources prior to development.	potential for sterilisation is low given the likely viability and feasibility of extraction prior to development taking place and therefore the impact will be negligible.		
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	-?	<p>There are a number of watercourses (including Ifield Brook and the River Mole) that pass through the site. It is assumed that the potential for any water pollution in these watercourses as a result of development will be mitigated by the delivery of SuDS.</p> <p>The site is not located in a Source Protection Zone. Through discussions with the Council, Thames Water has indicated that Crawley wastewater treatment works may present issues for accommodating large scale development without upgrading. Development in close proximity to Crawley is to be informed by flow monitoring and site</p>	<p>Homes England has engaged with Thames Water in relation to potential for upgrades to Crawley Waster Water Treatment Works.</p> <p>While the modelling is still to be completed, it has been indicated that there are feasible and deliverable solutions to accommodate development in SA101. Early engagement with Thames Water ensures that future upgrade requirements are understood and that the timing and phasing of delivery can be determined so as to not exceed existing capacity of the existing WwTW.</p> <p>It is therefore considered that the proposals should be scored as a</p>	++	<p>Opportunities for further capacity improvements at Crawley WwTW to accommodate the longer-term strategic development opportunity at this stage is more uncertain.</p> <p>However, a commitment to the strategic growth area at this stage, provides the necessary certainty to fully consider potential requirements and for these to be accounted for in short – medium term funding cycles so that if required, the necessary capacity can be provided in a timely manner in the future.</p>

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		<p>surveys across the Crawley catchment to refine the hydraulic model. This in turn will enable a more detailed assessment of the network reinforcement required to accommodate growth.</p> <p>As such an uncertain minor negative effect is expected in relation to this SA objective.</p>	<p>significant positive uncertain effect at this time.</p>		
SA 12: To manage and reduce the risk of flooding.	-?	<p>There are a number of watercourses (including Ifield Brook and the River Mole) that pass through the site. Land adjacent to Ifield Brook is located within flood zone 2 and 3 and land adjacent to the River Flood is mostly located within flood zone 2. However, the majority of the site is within flood zone 1.</p> <p>As the majority of the site being greenfield, development is likely to increase the overall amount of impermeable surfaces in the area,</p>	<p>While there are areas of flood risk within SA101, development will be directed towards Flood Zone 1 and necessary flood mitigation will provided in accordance with Para 156 and 157 of the NPPF and supporting guidance. Sustainable Urban Drainage will be utilised within the site with any necessary mitigation measures being designed so as to not exceed current runoff rates and increase flood risk downstream.</p>	++?	<p>The same approach to flood risk can be applied across the wider development opportunity area – although the level of flood risk is generally less than that on Site SA101. it is considered that a commitment to the larger scale development at this stage as part of the wider strategic growth opportunity provides the greatest potential to avoid areas with greatest flood risk and ensure that development is</p>

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		<p>which may increase flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective. The proposals for the site include a flood alleviation scheme which is likely to help address issues of flood risk and therefore uncertainty is attached to the score.</p>	<p>As set out elsewhere in the representation, Homes England is working alongside the Environment Agency to ensure that flood risk and necessary mitigation measures are appropriate and the opportunity for flood mitigation to also benefit existing at risk properties along the Ifield Brook and River Mole in proximity of the site is being explored. It is therefore considered that there are significant positive effects from the site in relation to flood risk – although at this stage they remain uncertain until further detailed modelling and design is completed.</p> <p>A detailed constraints maps (Annex C) has been prepared using detailed sites assessment and survey work to show the potential developable area within the SA101 taking account of all relevant constraints</p>		<p>directed towards areas with greatest capacity and that appropriate mitigation can be provided at a strategic scale if required.</p>

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SA 13: To reduce congestion and the need to travel by car	+ + / - ?	<p>In terms of access to existing sustainable travel options, the site located within walking distance of Ifield Railway Station to the south-east and a number of bus stops including those to the west on Ifield Drive and to the south on Hyde Drive.</p> <p>The site is also within walking distance of a number of neighbourhood centres within Crawley including those at Ifield, West Green and Langley Green. The neighbourhood centre of Gossops Green is also within 800m of the site, but pedestrian access is more limited to this area due to the presence of a railway line. As such, there is potential for future residents of the site to avoid using private vehicles, reducing congestion in the area. In addition, the site proposes to include a range of services and facilities</p>	<p>The assessment correctly identifies the locational and proximity benefits of SA101 to existing services and local facilities which will help reduce the need to travel.</p> <p>However, it fails to fully reflect the conclusions of other SA objectives (e.g. SA15) and fails to take account of the commitment to deliver the site in accordance with garden town principles as part of a new community and therefore many of the day to day services will be provided on site which will have significant positive benefits in terms of reducing the need to travel. The requirement for large scale strategic sites to provide the necessary mix of facilities is a clear requirement of the draft Strategic Policy 15 which can be further strengthened through the introduction of our proposed site-specific policies and therefore it is not</p>	++	<p>Within the wider strategic growth opportunity there are the same locational benefits as SA101 to maximise sustainable commuting patterns, although greater potential to accommodate a fully integrated public transport strategy that maximises the use of sustainable transport to / from and within the site.</p> <p>A commitment to a long-term strategic growth opportunity at this stage can help inform long term infrastructure investment strategies and help create the case for early investment in transport infrastructure to help establish the necessary behavioural change early in the delivery programme.</p>

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		<p>onsite, which is likely to contribute to meeting resident’s needs without travelling further afield by private car.</p> <p>Commuting patterns for the area based on 2011 census data indicate that, despite the site being within 1km of a railway station, few people commute to work using the train. The majority of people in the area commute via private car and new development at this location has the potential result in new residents adopting similar travel habits.</p> <p>The scale of development to be delivered may result in an overall increase of traffic on roads in the area. Furthermore, proposals for the site include the Crawley Western Relief Road with the middle section to be delivered during the plan period. While this new route may</p>	<p>clear why the benefits should be considered uncertain.</p> <p>In terms of access and use of public transport, the current assessment incorrectly assumes that the development will be largely car dependent, failing to recognise the locational advantages of the site both in terms of access and ability to influence commuting patterns. For example, conversations have already been had with metrobus and West Sussex Council about the potential to incorporate the existing Fastway bus service within the site (linking directly to key employment areas) which has high levels of patronage compared to more generic bus services with around 20% bus mode share compared to other areas.</p> <p>As set out elsewhere in this response, there is a commitment to provide and facilitate a new Crawley Western Link as</p>		<p>For example, opportunities that could be explored as part of a wider strategic growth area rather than SA101 in isolation include:</p> <ul style="list-style-type: none"> <li>- the delivery of the full Crawley Western Link to support sustainable transport opportunities early in the Plan period</li> <li>- the opportunity to influence future decision making on the Arun Valley line ensuring that investment decisions maximise the potential for modal shift</li> <li>- Opportunity to support significant investment in</li> </ul>

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		<p>help to alleviate congestion in the area it is also likely to reduce the potential for the achievement of modal shift.</p> <p>Overall, a mixed significant positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely commuting patterns following development.</p>	<p>part of the development but that the form of that link is still to be determined through strategic transport modelling that would be expected as part of the Local Plan process. It is expected that in line with the broader climate change and sustainable transport objectives that underpin the Local Plan review, opportunities will be explored that seek to maximise rapid public transport / sustainable transport therefore the current assessment that the CWRR may impact on the ability to facilitate a modal shift is understated.</p> <p>In terms of commuting patterns, there is a clear aspiration within the draft Plan for large strategic sites to provide a 1:1 homes to jobs ratio which provides clear sustainable benefits. Furthermore, SA1010 is uniquely placed in terms of its locational advantage close to major employment areas at Gatwick Airport, Manor Royal and the major town centres</p>		<p>A264/ Arun Valley Corridor which is currently ranked 19/22 of Transport for South East priority transport corridors.</p>

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			of Horsham and Crawley – all of which will be easily accessible by public transport and cycle routes– and the opportunity to improve economic connectivity providing a better balance between local jobs and locally identified housing needs.		
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.	+ + / - - ?	The scale of residential and employment development proposed could give rise to an increase in the level of traffic in the Hazelwich AQMA, which is located to the east of the site in Crawley in close proximity to the town centre. This effect is particularly likely considering commuting patterns for the area (based on 2011 census data) which indicate that private car trips are the most used mode of transport in the area adjacent to the site. New development at this location therefore has the potential result in new residents adopting similar travel habits. Proposals for the site include	Existing Air Quality issues are understood and recognition that the locational advantages in combination with associated infrastructure investment can have a positive impact on the existing situation is welcomed.  In light of the additional information provided against other SA objectives (in particular SA2, SA6 and SA13) it is considered that the potential for SA101 to contribute positively to addressing air quality in the district and adjacent areas is understated as there would be significant positive effects with uncertain minor negative effects at this stage.	+ + / -	It is considered that a commitment to the larger scale development at this stage as part of the wider strategic growth opportunity provides the greatest potential to address air quality issues and that appropriate mitigation can be provided at a strategic scale if required.

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		<p>the Crawley Western Relief Road (with the middle section to be delivered during the plan period) which may help to alleviate congestion in AQMA, which is likely to be beneficial to air quality at this location.</p> <p>The site is in close proximity to Ifield Railway Station to the south-east and multiple bus stops to the west. The provision of a range of services and facilities to be provided as part of the development is likely to further reduce the need for residents to travel longer distances. The aforementioned considerations have the potential to contribute to improved air quality in the District.</p> <p>Overall, a mixed significant positive and significant negative effect is expected for the site in relation to this SA objective. Uncertainty is</p>	<p>As part of any future planning application, it will be necessary to demonstrate through an Environmental Statement that any necessary mitigation measures have been identified and that there would be no significant air quality effects that will reduce the uncertainty further.</p>		

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		attached to the overall effect identified considering the difficulty to predict people's likely commuting patterns following development.			
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.	+/-	<p>The site is in good proximity to multiple existing sustainable travel links (including Ifield railway station and a number of bus stops) and site proposals include the delivery of a range of services and facilities as part of development. As such the development may result in a limited increase in the need to travel by private car and therefore potentially reduced carbon emissions in the District. The site proposals do not currently include any consideration for onsite renewable energy generation that could further contribute to reduced carbon emissions.</p> <p>The scale of the development at the site may result in increased traffic on</p>	<p>As set out above under SA13, there are significant locational advantages of SA101 that provide greater certainty in relation to the opportunity to secure changes in commuting patterns and to maximise the use of low carbon transport technologies.</p> <p>There is a commitment for the development to be 'gas free' in line with wider government ambition and the potential for alternative energy sources will be explored through the masterplanning process.</p> <p>It is therefore considered that the Site should be scored as minor positive effect likely.</p>	+	<p>Opportunities for the larger scale development to reduce emissions and mitigate against the impacts of climate change have been set out across a number of other SA objectives.</p> <p>Specifically in relation to energy generation increased certainty around the final scale of development will ensure that the feasibility of the wider range of energy solutions can be considered at the concept masterplan stage ensuring that the optimum solution is identified and that masterplan / housing design does not preclude the delivery of</p>

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		<p>roads in the area, contributing to increased carbon emissions. Furthermore, it is expected that while the delivery of the Crawley Western Relief Road at the site may help to alleviate issues of congestion in the area, but it may also limit the potential for modal shift to be promoted. Current commuting patterns (based on 2011 census data) indicate that private car trips are the most used mode of transport in the area adjacent to the site. New development at this location therefore has the potential result in new residents adopting similar travel habits.</p> <p>Overall, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict</p>			<p>alternative solutions longer term.</p> <p>It is therefore considered that a commitment to the larger scale development at this stage as part of the wider strategic growth opportunity provides the greatest potential to plan positively to address climate change issues and implement a comprehensive design led approach to climate change with appropriate mitigation can be provided at a strategic scale if required.</p>

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
		people's likely travel patterns following development.			
+	++	<p>The site is large and proposes to deliver a high number of dwellings within the plan period, which is likely to make a significant contribution to the local economy due to increased expenditure in the area, an increased workforce and the potential for new construction jobs. Site proposals during the plan period include 3,000m<sup>2</sup> of B1 office space, retail and a pub and restaurant/café, which will create around 750 jobs. In addition, development at this location is likely to complement growth at Gatwick airport where new jobs are likely to result in the longer term.</p> <p>As such, the site is expected to result in a significant positive effect in relation to this SA objective.</p>	<p>The assessment correctly identifies the potential for significant positive effects in relation to a sustainable and growing economy and no revision to the score is required. However, the assessment doesn't recognise the full potential of the scheme against this SA objective in as much as:</p> <ul style="list-style-type: none"> <li>- the site can provide a range of employment floorspace onsite and create wider business environments that will attract a productive workforce and therefore can contribute positively to the economic needs set out in the North West Sussex Economic Growth Assessment (2019) and emerging C2C Local Industrial Strategy.</li> </ul>	No revision	<p>The wider strategic development opportunity significantly increases the potential for the site to contribute positively towards the strategic economic objectives within the Gatwick Diamond and North West Sussex Functional Economic Area in as much:</p> <ul style="list-style-type: none"> <li>- It presents an opportunity to better align local housing and employment needs</li> <li>- Can provide for a full range of employment floorspace that helps meets the requirements identified in the Economic Growth Assessment (2019)</li> </ul>

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
			<ul style="list-style-type: none"> <li>- The site can accommodate a range of education facilities that can help increase education attainment levels locally.</li> <li>- The site is also located in close proximity to other major employment areas such as Manor Royal, Crawley and Horsham town centres and the proposed office development in the Horsham North development that could help meet long term growth aspirations in these areas</li> <li>- Large scale development can help improve economic connectivity and support</li> </ul>		<ul style="list-style-type: none"> <li>- Helps support the future expansion of major employment areas – such as Manor Royal</li> <li>- It can provide for the full range of housing types and tenures that meets the needs of the local workforce supply</li> <li>- Provide a full range of educational provision to help address identified skills gaps</li> </ul> <p>Providing the certainty around long term delivery of growth opportunity West of Crawley now, will help support the case for private and public</p>

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
			<p>significant investment in A264/ Arun Valley Corridor</p> <p>While some of these benefits are identified in relation to SA17 they are also relevant to this objective and are useful in demonstrating the sustainability advantages of the site.</p>		<p>investment in infrastructure, skills and a range of employment floorspace to help ensure that the overarching objectives for long term sustainable economic development are met.</p>
<p>SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.</p>	<p>++</p>	<p>Development at the site is expected to support the creation of a high number of jobs, which are likely to benefit existing residents in the area. Furthermore, the site is adjacent to existing urban edge of Crawley, where a range of employment opportunities are accessible. The site, however, is not located within walking distance of any of the key employment areas in Horsham or any of the main employment areas in Crawley. The closest of these are Three Bridges Corridor, Lowfield Heath and Broadfield Business Park</p>	<p>The assessment correctly identifies the potential for significant positive effects in relation to access to employment and meeting future needs and no revision is required.</p> <p>However, there are a number of omissions from the current scoring that further demonstrate the potential for the site to support wider employment growth. A number of these have been identified within this response against a number of other sustainability criteria such as:</p>	<p>No revision</p>	<p>As set out under SA16, the wider strategic development opportunity significantly increases the potential for the site to contribute positively towards the strategic economic objectives within the Gatwick Diamond and North West Sussex Functional Economic Area.</p> <p>Providing the certainty around long term delivery of growth opportunity West of Crawley now, will help support the case</p>

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
		<p>within Crawley, however, they are all more than 2.0km from the site. The site is in close proximity to existing sustainable travel links (including Ifield railway station and a number of bus stops) which are likely to provide opportunities for residents to access these employment opportunities.</p> <p>As such, a significant positive effect is expected for the site in relation to this SA objective.</p>	<ul style="list-style-type: none"> <li>- The opportunity for large scale housing to be provided that meets the needs identified in the North West Sussex SHMA to help provide for the local workforce;</li> <li>- The opportunity for the site to incorporate and enhance sustainable transport provision with the potential to improve sustainable access to major employment areas;</li> <li>- The opportunity for a range of employment space to be provided within the site that can help meet identified needs in the EGA (2019);</li> </ul>		<p>for private and public investment in infrastructure, skills and floorspace to ensure that the overarching objectives for long term sustainable economic development are met.</p>

HDC SA Objective	HDC SA 101 Score	HDC SA 101 Justification	Homes England Comment on HDC SA 101 Scoring / Justification	Homes England revised SA Score for SA 101	Homes England scoring considerations as part of wider Strategic Development Opportunity
			<ul style="list-style-type: none"> <li>- The opportunity for the site to accommodate a range of education uses to help improve the supply of a local skilled workforce.</li> </ul>		

## **Annex C: Site SA101 constraints and potential developable area**

An extensive desktop research exercise has been undertaken for SA101 and the surrounding land to understand the wider considerations and opportunities for West of Ifield. The findings are categorised into fixed and flexible considerations.

### **Fixed considerations**

Fixed considerations are generally physical constraints and designated landscape and built areas, some of which have statutory protection. It is considered that these areas are not developable and have a physical impact to the overall structure of the masterplan. These are shown in Figure 2 and include:

- Flood Safety Zones
- Local Wildlife Sites (LWS)
- Ancient woodlands
- Deciduous woodlands and good quality semi-improved grassland (not designated but Homes England is keen to maintain)
- Ecologically important hedgerow
- Site of Archaeological Importance and Listed buildings
- Gatwick Airport 60dB noise contour

### **Flexible considerations**

Flexible considerations are generally site features or planning and statutory designations that are considered to have some implications to the structure of the masterplan but could be addressed and incorporated into the design and layout of the natural and built environment. These are shown in Figure 2 and include:

- Field patterns, mature hedgerows and trees
- 50m buffer zones from LWS and ancient woodlands
- 50m buffer from Great Created Newt ponds
- Topography
- Roads within and around the site
- Public Right of Ways within and around the site
- Gatwick Airport safeguarding area / North Crawley Area Action Plan proposed boundary / Crawley 2035 Local Plan Western Link search area

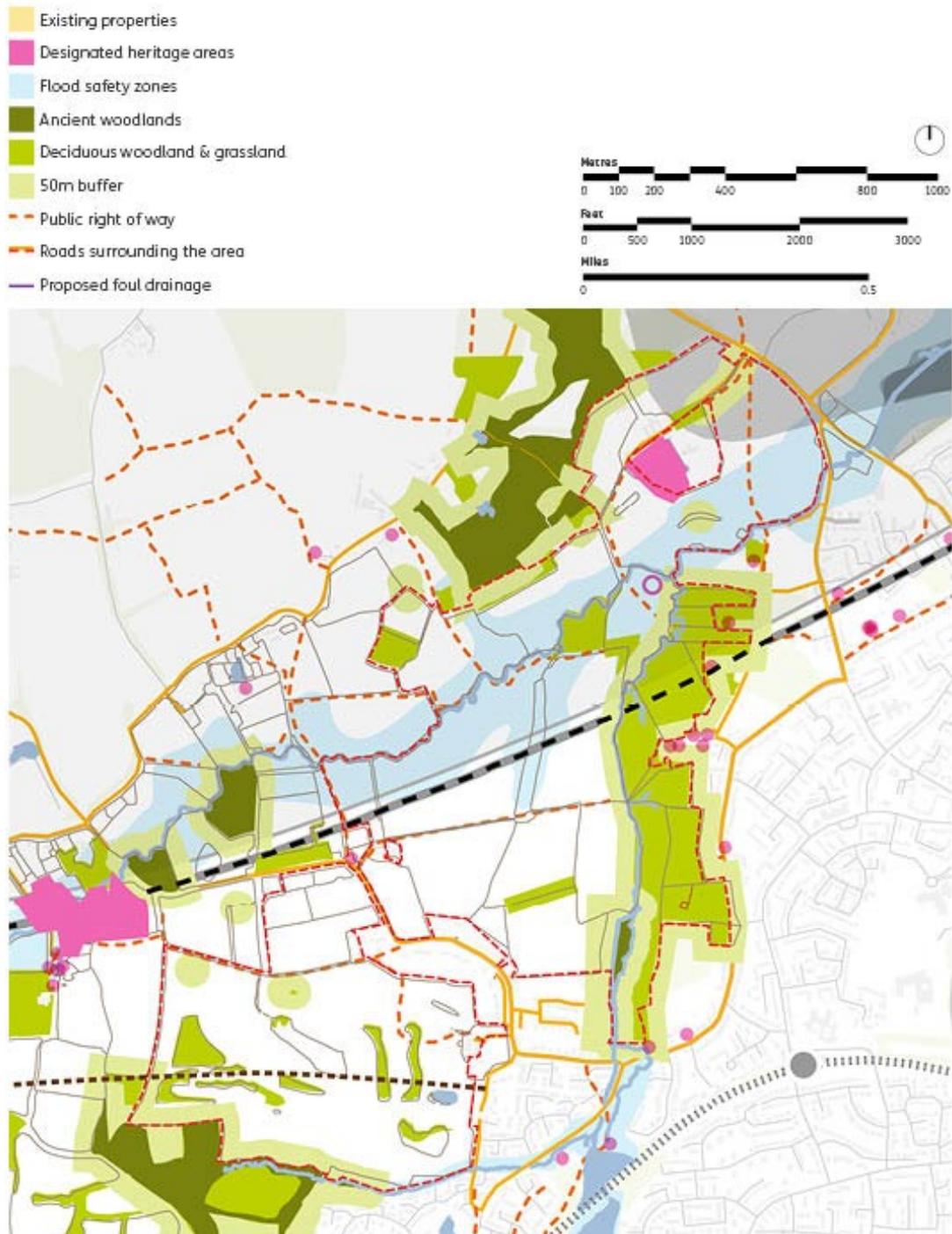


Figure 2: All Fixed and Flexible Constraints overlay

### Potential developable area

The overlay of fixed considerations (Figure 2) has identified areas that are potentially constraint-free and therefore, may be suitable for development (Figure 3). The potential developable area has been reviewed based on the suitability for development. This process is aimed to rationalise the developable area and eliminate areas that:

- Are too small
- Are too isolated by fixed considerations

- Do not form part of a contiguous development

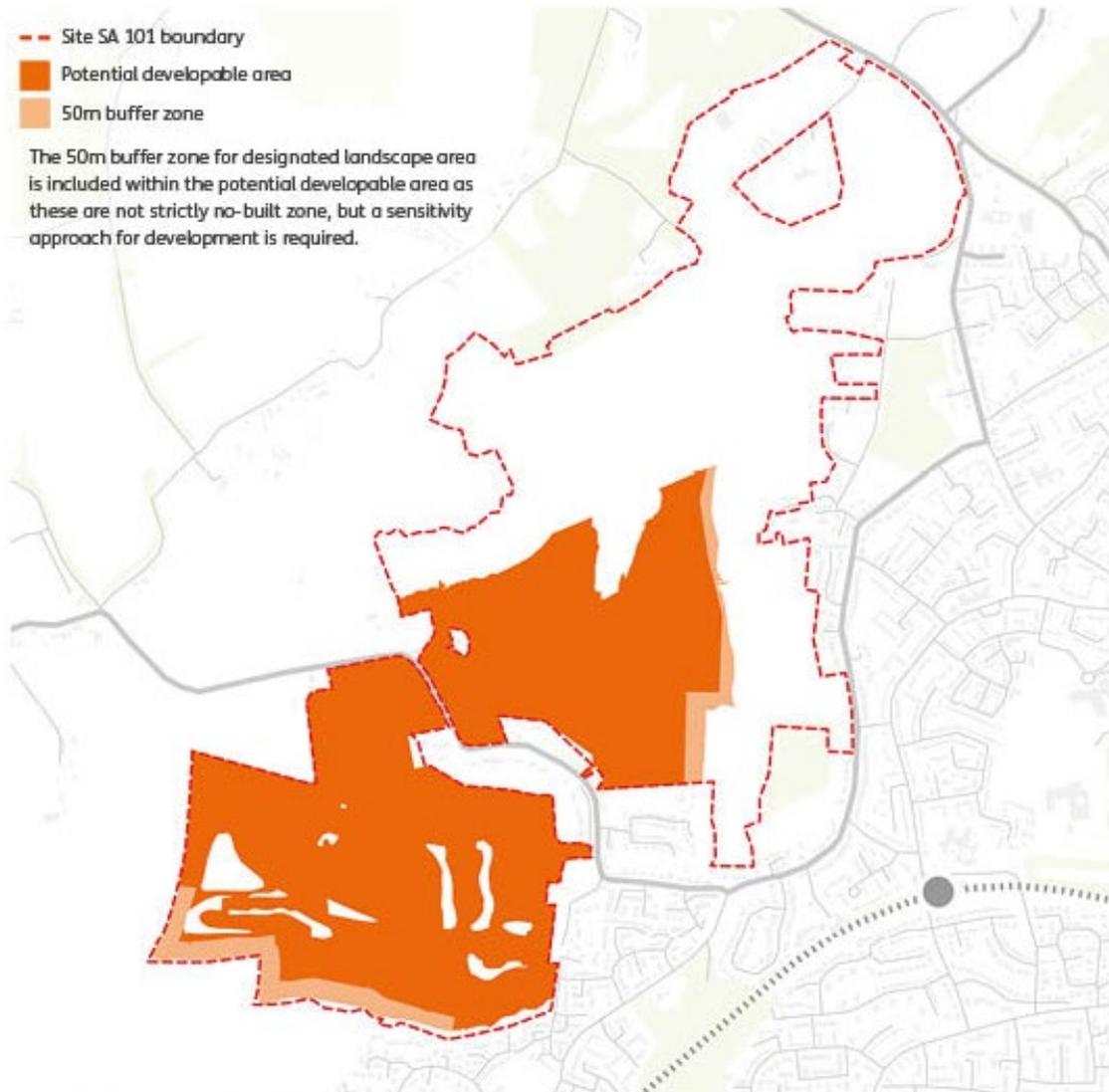


Figure 3: Land Area free of constraints.

### Rationalised developable area

The potential developable area is rationalised into development parcels which has a site area circa. 81 hectares. These parcels have a potential to form a contiguous development area within Site SA 101.

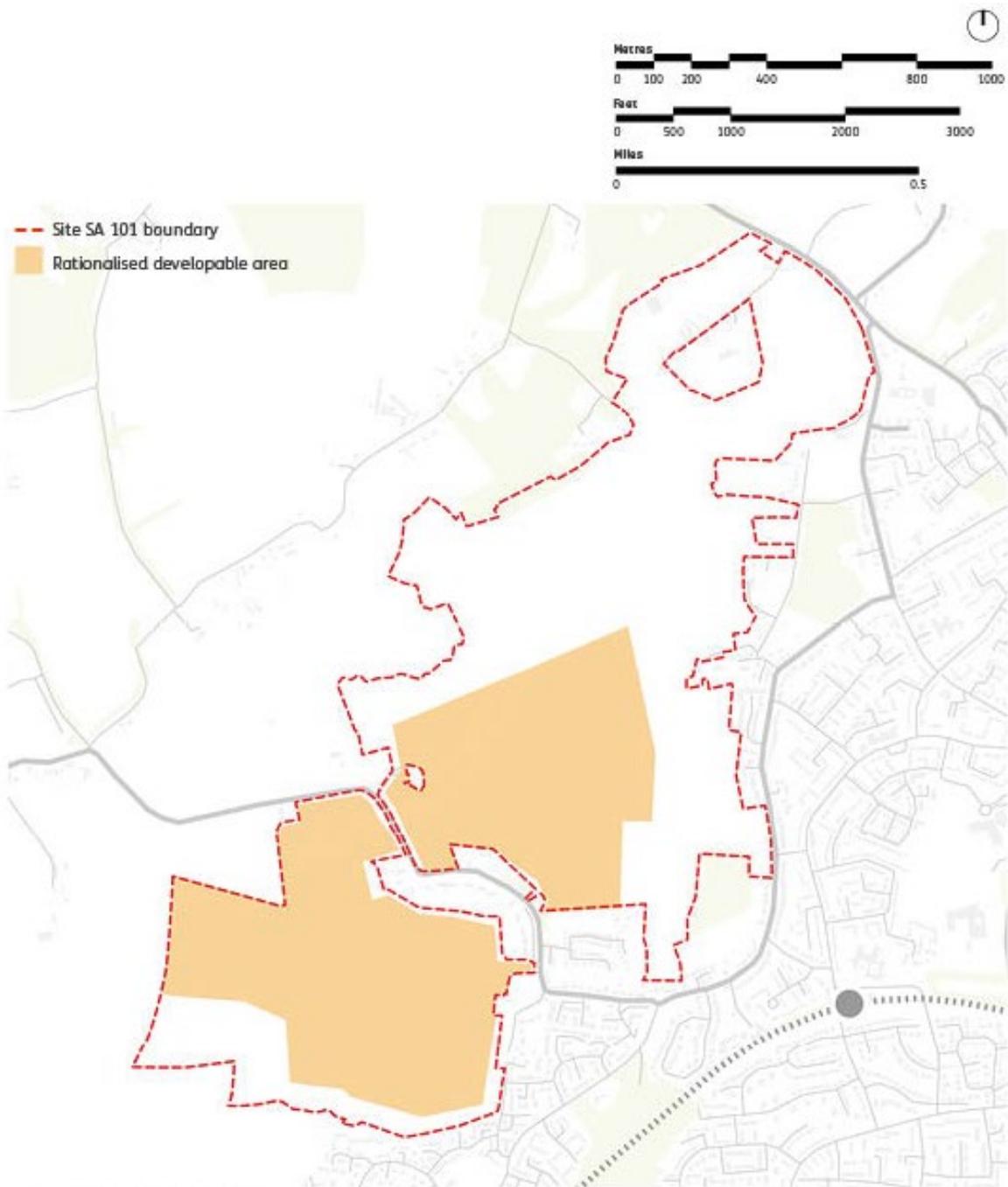


Figure 4: SA101 Potential Developable Area