

RESPONSE STATEMENT BY HORSHAM DISTRICT COUNCIL

HORSHAM DISTRICT LOCAL DEVELOPMENT FRAMEWORK SITE SPECIFIC ALLOCATIONS OF LAND DEVELOPMENT PLAN DOCUMENT

ALTERNATIVE DEVELOPMENT SITE -
Rookwood Golf Course (ADS31)

JUNE 2007



Rookwood Golf Course, Horsham (ADS31)

1. Introduction

- 1.1 Following the submission by the Council in November 2005 of the Site Specific Allocations of Land document (SSAL) (CDHor11) a number of alternative development sites were put forward by respondents for consideration as allocations. These sites were included within the Alternative Development Sites and Boundary Changes document (CDHor15), published for consultation in January 2006.
- 1.2 The Council does not support these suggested sites and maintains that they are neither necessary nor appropriate in the context of both the provisions of The Core Strategy 2007 (CDHor2) and the site specific considerations. The purpose of this Response Statement is to explain the Council's position on this Alternative Development Site and to address the issues raised in the submitted representations in support of, or against, the suggested allocation. The Statement sets out the Council's view on the likely key issue and question for Examination identified by the Inspectors, which is as follows:
- What are the exceptional circumstances that justify a recommendation other than one in conformity and consistent with the Core Strategy, as indicated under test of soundness 4 and 6?
- 1.3 The development potential of this site has been considered in the Land West of Horsham Strategic Development Background Document (CDHor29), Section 3.4, and the Council would wish to refer the Inspectors back to that work. It is not intended to repeat that information in this statement, only to amplify where necessary.

2. Site Description

- 2.1 The site consists of a golf course and public open space, a more detailed description is set out in paragraphs 3.4.1 – 3.4.9 of the Land West of Horsham Strategic Development Document (CDHor29).

3. Existing Policy Designation

- 3.1 The site lies outside the built up area as defined in The Core Strategy 2007 and Proposals Map 2006. It therefore lies within an area which is designated as countryside.

4. Relevant Planning History

- 4.1 This site was submitted as an alternative to the Land West of Horsham Strategic Development Location (Policy CP7) considered as part of the Examination of the Core Strategy 2007. The Inspectors in their report confirmed (paragraph 7.3 – 7.5) that this site had been considered and that it did not have the advantages of the CP7 allocation.

5. Principal Issues

- 5.1 The Council submits that any form of residential development on this site would be unnecessary and not in conformity with the development strategy set out in the Core Strategy 2007. It is further felt that the Council does not need to continue to consider alternatives to the allocation of the strategic location West of Horsham, contained in Core Strategy Policy CP7, as this has already been examined and the development proposals found to be sound.
- 5.2 Land at Rookwood Golf Course has been assessed for its development potential as set out in the Land West of Horsham Strategic Development Background Document (CDHor29). This study concluded that development would have a significant impact on the sensitive environment in this location and that there was poor integration with Horsham. It was felt that there were other less damaging and more sustainable locations available. However, consideration of the development of this site goes beyond just its examination as a 'stand alone' site and instead, as Broadbridge Heath Parish Council (2058) in their Hearing Statement contest, the land south of Warnham Road (part of ADS31) could be considered as an alternative to land west of the A24 / south of Broadbridge Heath allocated in Core Strategy Policy CP7.
- 5.3 The strategy towards the development of the strategic allocation west of Horsham is set out in the Core Strategy paragraphs 4.49 – 4.51. In addition the possibility of developing solely the eastern element of the CP7 Policy allocation was also considered in the Land West of Horsham Strategic Development Background Document (paragraphs 3.5.1 – 3.5.18). It was, and still is, concluded that development of this site in isolation is not possible due to access difficulties; it is also felt that there needs to be a recognition of the important and obvious linkages, particularly in terms of access for that community to many of the services and facilities not only within Horsham town but also to the south of Broadbridge Heath. It is felt that without this link the site does not fulfil the requirements of sustainable development. The whole basis behind the land west of Horsham strategic allocation is that it is a comprehensive approach to a large scale development, and that, although opposed by many, can at least provide a significant level of benefits. Subdividing it into smaller elements and spreading it out will be detrimental to the new and existing community. The Council is supported by many local residents and community representatives in not wishing to see the golf course developed. They consider that the golf facilities and open space are enjoyed by many people, that

residents of the town need access to open space, and that development would result in significant environmental damage, particularly in an area where work has been undertaken to improve biodiversity.

- 5.4 Finally the Council would also wish to highlight that initial calculations of the development potential of land to the south of Warnham Road within ADS31 have shown that between 600 and 700 homes could in theory be accommodated. This is not felt to be enough, when combined with development solely to the east of the A24 (within the CP7 allocation), to ensure that there is not a shortfall in housing provision in the District. This will result in the need to identify further land for development.

6. Response to Submitted Statements

- 6.1 Broadbridge Heath Parish Council (2058) considers that the southern part of ADS31, due to its location east of the A24, is suitable for development and is more of a natural extension to Horsham than land to the west of the A24 identified as part of the strategic allocation west of Horsham. The Council is, however, of the strong opinion that this is a simplistic approach to the assessment of site suitability. Although the site may well be east of the A24 it is separated from the town by a considerable floodplain, making linkages difficult, environmentally damaging and costly. The Council accepts that the study undertaken by MVA (West Horsham Strategic Location – Highways & Transport Feasibility Study – CDHor30) concluded that the option proposed by Broadbridge Heath Parish Council scored the highest of the alternatives considered for the whole Rookwood site (ADS31) but further analysis of the site (set out in the Land West of Horsham Strategic Development Background Document) clearly shows that the benefits of any development is far outweighed by its impact on a sensitive environment and the loss of public open space and a golf course. It remains the Council's opinion that the site does not perform well against other strategic development location alternatives and that the allocation of land as set out in CP7 of the Core Strategy is robust and based on credible evidence in accordance with Test of Soundness 7.
- 6.2 The criticism of the SA/SEA has been discussed previously through the Examination of the Core Strategy and the Council continues to feel that it is unfounded; it misrepresents the role of such an Appraisal and ignores the fact that it has been undertaken following a stepped progression in terms of the level of assessment and in looking at different locations adjoining Horsham, including land inside the A24 but not exclusively the golf course. We accept the comments made about the simplistic approach to the SA / SEA but would also like to refer to the qualification by the Inspectors in that paragraph that there were sufficient alternatives to provide reasonable, realistic and relevant options. Detailed comparison of all the alternative sites was also set

out in the Land West of Horsham Strategic Development Background Document.

7. Conclusions

- 7.1 The allocation of this site would not comply with the relevant Tests of Soundness and would make the Site Specific Allocations of Land Document less sound because:
- It would be contrary to Test of Soundness 6, in that development of this land would not accord with the development principles set out in the Core Strategy. Allocation of land for strategic development has been confirmed through the adoption of the Core Strategy and consideration of the alternatives has been undertaken.
 - It would be contrary to Test 7 in that development of the site would not represent the most appropriate in all circumstances as is clearly demonstrated in the Land West of Horsham Strategic Development Background Document.
 - It would be contrary to Test 4 in that development would be contrary to various elements of national planning policy and other plans and strategies through its detrimental impact on the environment, public open space, sporting facilities and would not result in a sustainable community.
- 7.2 The Council would wish to reaffirm its strong opposition to any suggestion of allocating ADS31, be it as an additional site or as an alternative to development west of the A24 allocated in Policy CP7 of the Core Strategy.