

# View Comment

**Document Section** [▶ Draft Horsham District Local Plan 2019-...](#)  
[▶ Housing \(Key Questions\)](#) [▶ Potential Housing Allocations](#)  
[▶ Land West of Southwater, Southwater](#)  
[▶ Land West of Southwater](#)

**Comment ID** /4466

**Respondent** [Campaign to Protect Rural Engl...](#)

**Response Date** 30 Mar 2020

**Current Status** Awaiting Processing

**Response Type** OBJECT

**What is the nature of this comment?**

Object

**Summary** The scheme is not sustainable. Uncertainties abound.

**Comment** CPRE Sussex objects to this scheme, which would consume 140ha of irreplaceable countryside, for the reasons explained below.

1. Southwater has and is experiencing a substantial increase in its built area and population. Time is therefore needed to enable assimilation into the physical and social fabric of the village.

2. Whilst a “commitment to providing affordable housing” on the site is “identified” by the developer, “the level is not specified” (Site appraisal, page 99).

2.1 Accordingly whether the scheme would deliver 35% affordable housing, let alone the 50% aspired to by the draft Plan policy, Strategic Policy 16 – Affordable Housing, is therefore not assured.

3. The “potential for alternative energy sources is not indicated”. We note that solar panels have not been provided for any of the houses built by the developer, west of Southwater.

4. We note with concern and incredulity that “The promoters indicate the existing healthcare facilities can accommodate additional growth (there is capacity at the health centre in Southwater)” (Site appraisal,

page 101). Incredulity, because of the magnitude of the proposed scheme, which would result in a substantial increase in Southwater's households (x1200) and population.

5. The scheme would provide "8% habitat biodiversity and 38% gain in linear features of biodiversity, together with 50 acres of open space" (Site appraisal, page 99). 8% habitat biodiversity? 38% gain in linear features of biodiversity? This needs to be explained in intelligible language. Development is required to produce a net gain for biodiversity of at least 10%.

5.1 Whilst HDC's site appraisal acknowledges the presence on the site of ancient woodland, it makes no mention of the existing network of hedgerows that provide vital-for-biodiversity connectivity across the site and beyond. Note that hedgerows are 'priority habitats'.

5.2 The Biodiversity 'neutral-impact' rating given in the appraisal is questionable, because the HDC Interim Sustainability Appraisal of Growth Options for Horsham District Local Plan Regulation 18 Consultation, at paragraph 2.58 advises that "The effects of development in relation biodiversity and geodiversity assets in Horsham will depend in part on the design, specific location of development and as well as the sensitivities of nearby biodiversity designations and other undesignated habitat areas. This is currently unknown and therefore all effects recorded in relation to SA objective 6 are uncertain".

5.3 Without that information it cannot be determined how the proposed scheme would impact on the site's biodiversity, including protected and priority species and habitats.

6. HDC's appraisal advises that "The developer in this location has relatively slow build-out rates, which may limit the number of homes that can come forward in the plan period". (Site appraisal, page 101). This has ramifications for five-year housing land supply, and Housing Delivery Test results.

7. The site appraisal also advises "that the site is close to Horsham and development is ongoing west of Southwater" (Site appraisal, page 101). There is therefore a risk that there may be cumulative impacts affecting market absorption and delivery of housing in this area. Again, this has ramifications for five-year housing land supply, Housing Delivery Test results.

**Proposed Change**    **Reject the scheme**

**Attachments**