



The countryside charity  
Sussex

**CPRE Sussex**  
Brownings Farm  
Blackboys  
East Sussex TN22 5HG  
Telephone 01825 890975  
info@cpresussex.org.uk  
[www.cpresussex.org.uk](http://www.cpresussex.org.uk)

## Horsham District Local Plan 2023-40 Consultation (Regulation 19)

CPRE Sussex response to:

### **STRATEGIC POLICY HA2: LAND WEST OF IFIELD**

CPRE Sussex objects to Strategic Policy HA2: Land West of Ifield for the reasons explained below.

1. The proposed scale of development would result in the loss of a considerable area of countryside, in which there are habitats of principle importance, including designated Ancient Woodland, a designated Local Wildlife Site, and an extensive network of hedgerows providing vital biodiversity connectivity across and beyond the site.
2. HDC's Regulation 18 site appraisal stated that
  - "There are a number of constraints in this area that could lead to the development impacting on biodiversity, flooding and heritage, and the site is affected by noise impacts from Gatwick Airport".
  - "Whilst there is potential for mitigation, these issues will need to be resolved and together with the proposed scale of development in this location, the rate at which the scheme can come forward and be delivered may slow the rate at which development can initially commence".
  - "a development of this scale will have very significant changes on the settlement pattern and the wider rural character in this area, and a particular concern is the potential for coalescence between Horsham and Crawley".

2.1 These are all critical issues in respect of Regulation 19 HDLP Policy HA 2: Land West of Ifield.

### **Efficacy of Sustainability Appraisal Update is questionable**

3. According to the Sustainability Appraisal (SA) Update, December 2023: (at page 93) Table 5.9 'Findings for policies allocating strategic sites in the 2021 draft' the appraised (--/?) 'significant negative effects likely' for the site's (SA objective 6) Biodiversity and Geodiversity reduces to the ambiguous (++/--?) 'mixed minor or significant effects likely' with mitigation. With mitigation, too, the appraised impact of the development on both (SA objective 7) Landscape and the (SA objective 8) Historic environment reduces from (--/?) 'Significant negative effects likely?' to (--/+?) 'minor

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

Facebook : [www.facebook.com/CPRESussex](http://www.facebook.com/CPRESussex) | Twitter : @cpresussex

negative effect likely', and the appraised effects for (SA objective 14) Air quality is the ambiguous 'mixed minor or significant effects likely' (++)/--(?) without and with mitigation.

3.1 The meaning of the '?' is not explained in the 'Key to symbols and colour coding used in the SA framework' detailed at page 168 of the Sustainability Appraisal Update.

3.2 However, if as seems likely the '?' denotes not known, or uncertainty, the Appraisal's efficacy is questionable – and in doubt.

3.3 And why is the Appraisal appraising the effects on Biodiversity and Geodiversity as a single entity, instead of Biodiversity and Ecology?

4. 'Horsham District Council 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 (Biodiversity and Geodiversity) are uncertain".

4.1 The continued use of the '?' the Sustainability Appraisal (SA) Update, December 2023, questioned at paragraph 3.1 above, indicates that all effects recorded in relation to SA objective 6 are uncertain and have yet to be determined.

5. 'The State of Nature 2019' report advises that "Ancient woodland, highly important in terms of biodiversity value and supporting a wide range of specialist species is estimated to cover only around 2.4% of UK land" – and that "Recreational use, particularly in woodland close to urban areas, has detrimental impacts on soils, invertebrates and flora through trampling and compression".

5.1 How the scheme would impact on the area's designated Ancient Woodland, and whether these detrimental effects can be prevented must be determined and considered.

6. NPPF policy 31 requires that plan policies should be underpinned by relevant and up-to-date evidence, which is adequate and proportionate, focused tightly on supporting and justifying the policies concerned.

6.1 What is the evidence base for the Appraisal?

6.2 Does the Appraisal's appraisal of the effects on biodiversity consider and assess the effects on priority species and habitats?

6.3 Is the Appraisal's appraisal informed by an up-to-date on-site 4-seasons survey of the site's fauna, including bird species (breeding, nesting and foraging there), bats and other small mammals, reptiles and amphibians and invertebrates, and flora?

### **Wastewater Treatment Works could take up to 10 Years to plan, design, obtain approvals and build**

7. Strategic Policy HA2: 10 states that 'Close liaison with water treatment utilities companies must be undertaken, including clear agreements on the phasing of development, to ensure that a new or expanded Wastewater Treatment Works (WwTW)

is provided to provide timely additional capacity for the sewerage network', but does not consider how long it would take to plan, design, obtain approvals, and build.

7.0.1 And neither does the Sustainability Appraisal (SA) Update's appraisal of the proposed development.

7.1 Helpfully, however, Draft Crawley Borough Local Plan 2024 – 2040 May 2023 for Submission Publication Consultation: May – June 2023, paragraph 8.11 advises that:

- 'The Water Cycle Study Crawley Addendum Report (January 2021) identifies that the flow permit for Crawley Wastewater for Crawley Wastewater Treatment Works is likely to be exceeded towards the end of the 2025-2030 period'.
- 'Thames Water has confirmed that the works is close to its treatment capacity and will exceed its permit during the Local Plan period'.
- 'Wastewater/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.
- 'in the event of an upgrade to sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade'.
- 'As a developer has the automatic right to connect to the sewer network under the Water Industry Act, the Infrastructure Provider may request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and/or water pollution'.
- 'In case of major development, it is strongly recommended that developers engage with Thames Water, as the wastewater infrastructure provider, at the earliest opportunity to establish: • the development's demand for wastewater/sewage treatment and network infrastructure, both on and off site, and whether it can be met; and; • what loading/flow from the development is anticipated'.

### **Affordable Housing: will the development deliver a minimum of 40% affordable homes?**

8. Will the development deliver a minimum of 40% affordable homes, as stated at HA2: 2 a)? Might viability be an issue for developers, as it was and continues to be for Land North of Horsham, which instead of the HDPF requirement for 35% affordable housing is delivering around 18% - on grounds of viability?

### **Gatwick Airport: Noise and Pollution**

9. The 'CPRE Aircraft Noise Study Findings Report', July 2019, shows that the northern part of the proposed site is within the Gatwick Airport noise contours 45db to 60db. Exposure to noise at these and higher levels are associated with adverse effects on health and sleep.

9.1 Exposure to air pollutants resulting from aircraft emissions, and from road traffic, which the airport attracts, with consequent harming impacts on health, is also a critical

issue ('CPRE Flight Blight: the social and environmental cost of aviation expansion', 2019).

9.2 Strategic Policy HA2:6 states that 'A full noise impact assessment and mitigation strategy is submitted and agreed by the Council, which demonstrates that aircraft noise has been assessed and its impacts mitigated across the whole development. No residential or other noise sensitive uses are permitted anywhere on the site considered to be exposed to current or potential future aircraft noise level, which is above 60dB LAeq, 16hr; Gypsy and Traveller accommodation should be located where noise impacts are not in excess of 57 decibels reflecting the lower level of acoustic attenuation provided by caravans'.

9.3 Has a full noise impact assessment and mitigation strategy, which demonstrates that aircraft noise has been assessed and its impacts can be mitigated across the development, been submitted and agreed by the Council?

9.4 Does the proposed scheme, in respect of noise and air pollution in consequence of Gatwick, meet the requirements of Strategic Policy 27: Inclusive Communities, Health and Wellbeing: 2 stipulation 'New development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and wellbeing needs'?

### **Ecosystem Services**

10. How the loss of this extensive area of countryside, in effect a green lung, would impact on the residents of Crawley and their wellbeing seems not to have been considered. It should be considered.

11. The impact that the development would have on ecosystem services within and adjoining the site and for Crawley has not been assessed or considered. It should be assessed and considered.

### **Conclusion**

12. We question the viability of Policy HA2: Land West of Ifield and consider that the Policy should be rejected.

Dr R F Smith

Trustee CPRE Sussex