Horsham District Local Plan Public Consultation (Reg.18)

Representations to Potential Housing Allocation ‘Land at Rookwood, Horsham’ (Strategic Policy 14)

Prepared and submitted on behalf of Horsham District Council (as Landowner)

March 2020
Contents

1. Introduction .................................................................................................................................................................... 1
2. Local Plan Evidence Base ............................................................................................................................................ 2
3. Potential Housing Allocations – Land at Rookwood, Horsham ............................................................................. 7

Appendices

Appendix A Comments on Interim Sustainability Appraisal
Appendix B Concept Masterplan and Vision
Appendix C Environmental and Technical Constraints Plan
Appendix D Environmental and Technical Feasibility Report
Appendix E Transport Constraints Plan
Appendix F Transport Feasibility Report
Appendix G Ecological Constraints Plan
Appendix H Ecological Opportunities
Appendix I Ecological Precedents

Prepared By:

Nick Alston
020 7911 2056
Nick.alston@avisonyoung.com

For and on behalf of Avison Young (UK) Limited
1. Introduction

1.1 This representation has been prepared by Avison Young (with support from Planit.ie and Stantec) on behalf of the owners of the Rookwood Golf Course site, Horsham District Council. The site is referred to as ‘Land at Rookwood, Horsham’ (ref. SA395) in the draft local plan and the ‘Site’ in this document.

1.2 The purpose of this representation is to provide the Local Planning Authority with our response to the following question:

**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?

**Response**

1.3 This document sets out our response to the above question with specific respect to the Site. It focuses on providing the Local Planning Authority with helpful information regarding the suitability, deliverability and achievability of the Site to inform the next stage in the preparation of the new local plan. It is structured as follows:

- **Section 2** provides our comments on the local plan evidence base (i.e. the supporting information); and
- **Section 3** provides our comments on the Potential Housing Allocation for the Site, as set out at Pages 94-97 of the draft Local Plan.
2. **Local Plan Evidence Base**

2.1 The purpose of this section is to provide comments on the Local Plan evidence base, insofar as is relevant to the Site.

**(i) Strategic Housing Market Assessment (SHMA)**

2.2 We support the findings of the North West Sussex Strategic Housing Market Assessment (SHMA) (2019). Noting that more up to date data is now available (and/or will likely become available ahead of the draft plan being submitted for independent examination), we recommend the SHMA is updated to inform the next draft of the local plan. Please refer to our separate response to Strategic Policy 14 (Options for Housing Growth) for further comments.

**(ii) Housing Site Assessment**

2.3 Please refer to comments at Section 3 of this document.

**(iii) Landscape Capacity Study**

2.4 The Methodology adopted within Horsham Council’s 2020 Landscape Capacity Study is consistent with Planit’s Landscape Capacity Study (see Appendix B), and follows Landscape Institute Guidelines.

2.5 The Council’s report makes the following definition in terms of housing development:

- Large Scale Housing Development of 500 or more dwellings associated with urban extensions to the main town of Horsham, small towns or large villages, or new settlements. It is assumed that this development would comprise mainly two storey developments of no more than 8.5m in height, at an average of 35-40 dwellings per hectare. This type of development may include some smaller areas of no more than 3 storey height flats, as well as community/retail facilities.

- Medium Scale Housing Development of approximately 100-500 dwellings associated with urban extensions to the main town of Horsham, small towns or large villages. It is assumed that this development would comprise mainly two storey developments of no more than 8.5m in height, at an average of 35-40 dwellings per hectare. This type of development may include some smaller areas of no more than 3 storey height flats, as well as community/retail facilities.

2.6 It is our view that such a categorisation of housing development is too simplistic and based on a standard housing design approach. It does not consider that good design/mitigation principles could be integrated into the design of housing proposals at densities of circa 50 DPH. Thus, there are a considerable number of best practice case studies of housing development at circa 50 DPH, which creates a compact development area and maximises the retention of the existing green infrastructure of respective sites.

2.7 In terms of the Landscape Character Area Boundaries, the Council’s current 2020 report has altered the boundaries from the 2014 study, reducing the areas to include character area 34: Land at Rookwood. This provides a more accurate reflection of the southern parcel of the Rookwood Golf Course site; however, this is with the exception an area of land to the west of the A24 that has limited characteristics of the Golf Course’s southern parcel; containing characteristics more reflective of Warnham Deer Park, which formed part of the Broadbridge Heath Character Area in the 2020 study. On this basis, the report concludes that the

*Date: March 2020*
The southern site has moderate capacity for medium scale housing and moderate-low capacity for large scale housing.

2.8 We have a number of concerns in relation to the reliability of the Council’s 2020 evidence in assessing the potential of the site for housing for the following reasons:

2.9 Southern Site Area:
- The conclusion of the study does not take account the detailed character areas of the site to accommodate change, as formulated in the Planit Study, which is a more accurate and granular reflection of these areas to accommodate change (enclosed at Appendix B). By breaking the site down into a series of character areas it is possible to identify the finer grained variances across the site in terms of landscape capacity. Thus, whilst the study reaches broadly similar conclusions in terms of moderate landscape capacity within the majority of the southern Golf Course site area, the Planit study actually identifies that Boldings Brook also has limited capacity on the basis of its visual sensitivity, its designation as the West Sussex Literacy Trail and historic value (originally being the approach to the listed building).
- The study’s approach to defining medium and large scale density (500 unit threshold) skews the ability to assess the impact of the initial masterplan, in that circa 567 units are proposed in the southern parcel. If we follow this definition, then the proposals are considered large scale, which the study defines as Low-Moderate capacity. Given that the proposals are only 67 units over the medium scale threshold, and that the landscape capacity of the site to accommodate these additional 67 units would be judged in a similar manner to any housing sites, we believe that this tipping point, is not an accurate tool for assessing landscape capacity, in these particular circumstances.

2.10 Northern Site Area
- Within the 2020 report, the northern area of the site falls within Character Area 36, Warnham Nature Reserve. However, the site boundary includes the Nature Reserve and the Golf Course as one character area, which skews the landscape capacity assessment of the site, concluding that as a whole it has no or low capacity for either medium scale or large scale housing development. Such an approach is not able to consider each detailed character area of the site to accommodate change, as formulated in the Planit Study. As previously mentioned, by breaking the site down into a series of character areas it is possible to identify the finer grained variances across the site in terms of landscape capacity. Thus the main fairways within the site, should not be given the same landscape capacity assessment as the Nature Reserve - the Planit study concluding that these areas having a moderate capacity to accommodate development.
- Within the Planit study, whilst the Nature Reserve and Walnut Plantation are considered to have No/Low capacity to accommodate change, within the golf course there are areas of moderate capacity (Areas 2, 4, 5, 6, 9 and 10 to accommodate change). Thus, the landscape character area could be able to accommodate areas of new development in some parts, providing it has regard to the setting and form of existing settlement and the character and sensitivity of adjacent landscape character areas. There are landscape constraints and therefore the key landscape and visual characteristics must be retained and enhanced. The assessment has considered that these areas are well used and appreciated by paying members of the public resulting in a moderate level of landscape sensitivity, but their overall landscape value can only be considered as a local recreational facility.
(iv) Gypsy and Traveller Accommodation Study

2.11 No comments.

(v) Infrastructure Delivery Plan (IDP)

Minerals Safeguarding

2.12 Section 2.7.6 of the IDP identifies that the Site is within a Minerals Safeguarded Area (MSA) (Brick Clay). It states that further consultation with West Sussex County council and consideration of suitable mitigation measures would be required.

2.13 We note that Policy M9 of the West Sussex Joint Minerals Plan (2018) allows for non-mineral development within MSAs (including development that would sterilise the potential to extract minerals from the land), where the over-riding need for the development outweighs the safeguarding of the mineral. The SHMA provides the over-riding housing need evidence to justify the principle of developing the site. In order to ensure that the new Local Plan forms part of a joined-up development plan as a whole, we recommend that this section of the IDP is updated to specifically refer to the Minerals Plan and the SHMA.

Infrastructure Delivery Schedule

2.14 The Infrastructure Delivery Schedule links a number of specific infrastructure projects to the Rookwood Golf Course site. We have comments as follows:

- **Horsham Station Enhancements** - The need for such enhancement works would be generated by the increase in resident population associated with the overall housing growth planned in the district as a whole, as opposed to being necessary for the development of specific sites to be acceptable. If evidence confirms that such enhancement works are required, they would be best funded via CIL not s.106 contributions.

- **Bridleway Links** - We agree with the identification of improved bridleway links to/from the Rookwood Golf Course site, including the opportunity for these to be funded by West Sussex County Council and CIL.

- **Education** - The IDS identifies that the child yield associated with redeveloping the site will likely give rise to the need for 36-40 sixth from places; 162-180 secondary school places; 225-250 primary school places; 50 early years places; and 7 SEND pupil places. The actual figures will need to be recalculated at the planning application stage based on the number of homes, tenure mix, and unit size mix.
  - In principle, the site is suitable to accommodate a primary school and nursery as part of residential-led mixed use development, however the IDP should maintain flexibility for the additional capacity to be provided off-site.
  - The site is not suitable for a secondary school, sixth form or special school. The IDP should make clear that additional capacity required to meet the needs generated by the development should be satisfied off-site. The expansion of existing schools and/or provision of new schools elsewhere (in line with proposals set out in the draft plan) would be the most effective means of satisfying these needs in a manner that considers the overall population growth of the town as a whole. Accordingly, this would be best funded via CIL not s.106 contributions.
- **Health and Social Care** - The need to improve the Central Horsham NHS primary care estate would be generated by the increase in resident population associated with the overall housing growth planned in the district as a whole, as opposed to being necessary for the development of specific sites to be acceptable. Accordingly, if evidence confirms that such works are required, they would be best funded via CIL not s.106 contributions.

- **Community and sports facilities** - The quantum and types of open space identified in the IDS for the site are based on 2014 district wide evidence and therefore do not account for the unique landscape and ecological characteristics of the site. On account of these characteristics, broader planning policy considerations indicate that a more bespoke approach should be taken to determining the most appropriate provision of open space on this site. We recommend that the IDS is amended to account for this.

**(vi) Strategic Flood Risk Assessment (FRA)**

2.15 The site contains the Boldings Brook, a tributary of the River Arun. The Boldings Brook is a designated Main River and flows in a southerly direction through the site. An unnamed watercourse joins the Boldings Brook near the southern extent of the site. Warnham Mill Pond lies to the east of the site and is the point of confluence of the Boldings Brook and the Chennells Brook, which is also a designated Main River.

2.16 The Horsham District Council 2019 Strategic Flood Risk Assessment (SFRA) provides the following information with respect to flood risk at the Rookwood Golf Course site:

- The SFRA Flood Zones map indicates that the site is largely classified as Flood Zone 1 ‘Low Probability’, with areas of Flood Zones 2 ‘Medium Probability’ and 3 ‘High Probability’ immediately adjacent to the Boldings Brook;

- The SFRA Risk of Flooding from Surface Water map indicates that the site is largely classified as at Very Low risk of surface water flooding. Land adjacent to the Boldings Brook and Chennells Brook is largely classified as at between Low and High risk of surface water flooding, however the areas of High risk appear to be well contained within the channels and

- The SFRA Historic Flooding map indicates that there are no recorded historic flood extents on the site.

2.17 For development located within Flood Zone 1 ‘Low Probability’, finished floor levels should be raised a minimum of 300mm above the external general ground level to mitigate the residual flood risk associated with excess surface water runoff, as recommended in the Draft Environmental and Technical Feasibility Report. For development located within Flood Zones 2 and 3, the SFRA states that finished floor levels should be raised 600mm above the 1 in 100 annual probability flood level plus an appropriate allowance for climate change.

2.18 The SFRA recommends that riverside developments “retain an 8m wide undeveloped buffer strip alongside Main Rivers”. This applies to any development alongside the Boldings Brook and Chennells Brook.

2.19 The SFRA states that safe access and egress routes must be provided for new development located in areas at risk of fluvial flooding. The Draft Environmental and Technical Feasibility Report identifies safe access routes via the A264 and A24 which will be continuously available during the extreme 1 in 1000 annual probability event.
2.20 The SFRA states that “Sustainable Drainage Systems (SuDS) should be used to reduce and manage surface water run-off to and from proposed developments as near to source as possible”. The Rookwood Golf Course Draft Environmental and Technical Feasibility Report (unpublished PBA, 2017) proposes a SuDS scheme that will mimic the natural drainage regime of the site. Rainwater will be stored in attenuation ponds on site, which would also be designed to provide biodiversity benefits, and then gradually released into the Boldings Brook and Chennells Brook. There is an aspiration for biodiverse roofs to be installed on the buildings, which will attenuate rainfall at source and provide further improvements in water quality.

2.21 There is an opportunity to incorporate a scheme aimed at naturalising the floodplain of the Boldings Brook and the unnamed watercourse in the southern half of the site, for example a two-stage channel throughout the southern half of the site. This is likely to provide a reduction in flood risk to the site, but more importantly to existing properties adjacent to and downstream of the site. The inclusion of surface water drainage features within the site gives the opportunity for enhancing ecological habitats using ponds and wetland areas. These areas also give significant amenity benefit if they are carefully designed and maintained.

(vii) Interim Sustainability Appraisal

2.22 Please refer to the matrix provided at Appendix A. This has also been submitted separately to strategic.planning@horsham.gov.uk in accordance with the consultation guidance note on how to make comments on the Interim Sustainability Appraisal.
3. Potential Housing Allocations - Land at Rookwood, Horsham

3.1 The purpose of this section is to provide our comments on the potential allocation of the Land at Rookwood site for housing (as set out at Pages 94-97 of the draft Local Plan). The focus is to provide the Local Planning Authority with further information to demonstrate the Site’s Suitability, Deliverability and Achievability and the opportunity it presents to bring forward genuinely sustainable development.

3.2 We have no comments on the assessment process.

3.3 We have set out our comments below in Table 3.1 in the same structure and ‘RAG’ rating format as used in the draft Local Plan.
### Table 3.1 - Site Assessment Comments

| Criteria                          | Current Score | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|
| Landscape                        |               | **We consider that the site will have a ‘favourable impact’ in landscape terms when assessed against the criteria:**  
**Is the site in or adjoining a protected landscape (AONB / National Park)?**  
The site is adjacent to a Registered Park; however, given the significant amount of intervening woodland, and that the site has changed from its historic character, as part of that estate, to a recreational golf facility, the change in landscape character as a result of new development would follow classical design principles, which would draw from townscape and landscape characteristic within the historic estate. On this basis, the proposed development could reintroduce the connection to the historic park, in terms of character, which had been eroded through the development of the golf course.  
Whilst the site lies adjacent to the Local Nature Reserve, including the enveloping of Walnut Wood Plantation, development would be designed to sensitively relate to these boundaries with significant buffer space, road infrastructure kept away from the interface, and substantial high quality frontage along the nearest adjacent boundary.  
**What is the capacity of the landscape to accommodate the scale of development proposed (this should refer to the HDC Landscape Capacity Study where possible)?**  
The conclusion of the 2020 HDC study does not take account the detailed character areas of the site to accommodate change, as formulated in the Planit Study (enclosed at Appendix B), which is a more accurate and granular reflection of these areas to accommodate change.  
A landscape capacity study was used to assess the potential for each detailed character area (see site diagram) of the site to accommodate change, and thus their capacity for housing. By breaking the site down into a series of character areas it is possible to identify the finer grained variances across the site in terms of landscape capacity.  
The plan identifies areas which could not accommodate new development without a significant and adverse impact on the landscape character. This includes Warnham Nature Reserve, Walnut Plantation and Riverside Walk. Boldings Brook also has limited capacity on the basis of its visual sensitivity, its designation as the West Sussex Literacy Trail and historic value (originally being the approach to the listed building). In this location, very small-scale development may be possible, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas.  
Within the golf course there are areas of moderate capacity (Areas 2, 4, 5, 6, 9 and 10 to accommodate change). Thus, the landscape character area could be able to accommodate areas of new development in some parts, providing it has regard to the setting and form of existing settlement and the character and sensitivity of adjacent landscape character areas. There are landscape constraints and therefore the key landscape and visual characteristics must be retained and enhanced. The assessment has considered that these areas are well used and appreciated by paying members of the public resulting in a moderate level of landscape sensitivity, but their overall landscape value can only be considered as a local recreational facility.  
**Does the site offer opportunities for regeneration / landscape enhancement?**  
Significant opportunities exist, which include:  
- Throughout the site, the **mature planting and ponds** should serve to define a strong landscape framework,  
**Recommended Score**                                                                                           |
which development should be carefully crafted around. The landscape would help define development character areas, create a unique sense of place and a clear and legible layout. Further, the green network should inform the density of the particular character areas.

- Protect and enhance existing woodland. Existing woodland should be retained and enhanced with additional tree planting and tracts of greenery to link different areas as biodiversity corridors. Green buffers should be planted to the woodland edge, where development should be restricted.

- Work with Warnham Nature Reserve. Warnham Nature Reserve should be protected as a valuable wildlife and human recreational and sustainable resource. It may be appropriate to provide additional links into and through the nature reserve, to integrate with any new development. Development along its boundary should be heavily restricted and sensitive.

- Swales offer valuable wildlife corridors and a water retention resource. More naturalistic swales would be best suited to link up the existing and potential water bodies and tracts of woodland. Swales can also take on a more urban, formal form, linking roads and collecting surface water runoff.

- There are several substantial existing water bodies in the site; Boldings Brook, Red River, Warnham Mill Pond and the golf course pond. There are also several other smaller ponds nestled within the golf course and nature reserve. These are a valuable ecological resource and should be retained and integrated.

**If known, what mitigation is proposed to minimise or reduce any potential landscape impacts? Will this be incorporated into any masterplanning?**

The form and scale of the development will be informed by the existing mature landscape. The development principles identified would ensure that density reduces towards the perimeter of the development, and that the scale and massing reflects the informal character of the woodland. Within these locations larger detached dwellings would be set within existing mature landscape, which would again serve to mitigate any impacts.

**Do the proposals contribute to the provision of new or improved green infrastructure?**

The proposals will not only create a more enhanced green infrastructure within the site itself, as described above, but they will form part of a wider linear corridor of recreational and biodiversity which links the Nature Reserve through Boldings Brook and down to new housing development along the southern edge of Horsham. Such a strategic green infrastructure corridor will have a significant positive impact across the western edge of the settlement as a whole.

**Biodiversity**

We consider that the site proposals would have a ‘favourable impact’ in bio-diversity terms

The landowner has undertaken a range of ecological studies along with stakeholder consultation in order to identify sensitivities at the Site at an early stage. This has ensured high quality ecological resources can be retained and enhanced within the Site, and any potential impacts can be avoided through sensitive design of the masterplan.

In addition, the landowner has made a commitment during initial consultation with stakeholders, that the development will deliver 10% biodiversity net gain, and this will be delivered through creation and enhancement of habitats within Rookwood Golf Course.

Warnham Nature Reserve will be buffered from the development by new semi-natural habitats including scrub, diverse grassland, and wetland habitats (created through sensitive design of surface water attenuation areas). These semi-natural habitats will complement and extend the habitats within the Site and adjacent Nature Reserve.
protecting and enhancing them and the species which they support. This network of blue and green infrastructure will also provide links between Warnham Nature Reserve and habitats in the wider landscape, potentially supporting local Nature Recovery Networks, where present.

Refer to the following appendices for further information:
- Appendix C – Environmental and Technical Constraints Plan
- Appendix D – Environmental and Technical Feasibility Report
- Appendix I – Ecological Precedents
- Appendix H – Ecological Opportunities

| Archaeology / Cultural Heritage | We agree with this neutral assessment score. The site contains a number of assets which provide architectural and historical context and / or amenity opportunity for future development. This includes the industrial landscape which extends to the limits of the Warnham Mill Pond, the two arms of Boldings Brook and associated built heritage features: the sluice (Orion 1), Mill Cottages (Orion 2), Warnham Local Nature Reserve Offices (Orion 3), Warnham Mill Bridge (Orion 4) and footbridge (Orion 5). There is also potential for previously unrecorded or earlier archaeological remains associated with the iron industry and corn milling may survive around the 18th-19th century structures and the water courses. The 19th-century Rookwood Farm (WHER MWS13458) and Warnham Place Outfarm (WSHER MWS13905) form a record of dispersed rural settlement. It is noted that the condition of Warnham Place Outfarm is currently poor. The archaeological potential of the site was tested in 1992 prior to the re-development of the site as a golf course (South Eastern Archaeological Services 1992). Geophysical survey has also been undertaken in the area to the north of the site within Warnham Local Nature Reserve (WSHER MWS14098; Figure 2b) which had negative results. Taking into account the results of these investigations and a review of known archaeological sites in the immediate vicinity of the site, well-preserved buried archaeological evidence which would warrant preservation in situ are not expected. As relatively little trenching has occurred in the southwestern part of the site and this area which lies closest to known Iron Age - Romano-British occupation at Broadbridge Heath, supplementary trenching in the south-western part of the site may be required. The proposed development would not have a direct physical impact on any designated heritage assets. The proposed development would result in the residential development near a number of designated assets. Should the emerging masterplan involve alterations to the mill pond, watercourse, sluice and contemporary built structures, further assessment of the impact that this change will have on the setting of the grade II listed Warnham Mill (NHLE 1286755) will be required. The site beyond these makes a marginal contribution to the significance of this asset and no further assessment would be required. It is considered unlikely that the significance of the grade II Warnham Mill House (NHLE 1027490), grade II Warnham Court (NHLE 1001413) and grade II* listed south-east lodges of Warnham Court School (NHLE 1354221) would be impacted by re-development within the study area. Refer to the following appendices for further information: |

| Appendix C – Environmental and Technical Constraints Plan |
| Appendix D – Environmental and Technical Feasibility Report |
We consider that the site should be assessed as having a **neutral impact** when considered against the assessment criteria:

Current land at the site comprises a golf course, classified as grade 4 (poor)1 & 2. The proposal would therefore not lead to loss of best and most versatile agricultural land. There is no known land contamination on site, and with the only previous land being for agricultural purposes, the potential for unknown contamination at the site is not considered a constraint to development. It is considered any future planning application would be supported by a Phase 1 Ground Conditions Assessment, which would identify required mitigation measures to reduce unacceptable impacts to the environment should they be identified 3.

The site does not fall within, or adjacent to any Air Quality Management Areas. It is anticipated that a Construction Environmental Management Plan (CEMP), supported by a dust risk assessment would be adopted during any construction works to employ relevant dust mitigation measures. Furthermore, it is not considered that the operation of the proposed development would introduce significant point sources of emissions to air quality3.

Construction noise could impact existing residential dwellings adjacent to the site, however these impacts can be minimised through the adoption of standard best practice construction methods provided in British Standard 5228 and through the adoption of a CEMP. Traffic generated by the proposed development is anticipated to be routed via the A24/A264 therefore avoiding interaction with existing dwellings. External noise impacts from the A24/A264 to proposed new dwellings would be minimised through implementing good acoustic design, such as orientation, standard set back distances, acoustic screening features and appropriate building fabrics. Internal noise levels associated with proposed dwellings from external sound sources are anticipated to be acceptable with no specific acoustic mitigation measures across most of the site3.

The site is located within the Brick Clay Mineral Safeguarding Area (MSA), however it is considered unlikely that the site would be allocated for mineral extraction owing to its proximity to residential development1. The MSA is therefore not considered a constraint to the proposed development. Nevertheless, should the site be allocated for development, Policy ‘M5 – Clay’ of the extant West Sussex Minerals Local Plan supports the extraction of brick clay provided it would help maintain a stock of permitted reserves of at least 25 years of permitted clay reserves for individual brickworks. Therefore, there is an opportunity in principle for future development to be preceded by extraction with subsequent infilling using inert material, preventing the sterilisation of any viable mineral reserve yet providing building material for future residential development.

In relation to water quality, the site is not located in a Source Protection Zone. It is not anticipated that construction would result in a detriment to water quality subject to the adoption of appropriate measures in a CEMP, nor during operation owing to the adoption of good practice design measures during the masterplanning phase. As acknowledged on page 96 of the Emerging Local Plan itself, the river floodplain is not proposed for development. Any future application would need to be supported by a Flood Risk Assessment regardless of whether development in a hydrologically sensitive area, which would detail the measures to prevent additional risk to flooding either up or downstream.

It is therefore considered that the supporting commentary on pages 95 – 97 of the Horsham District Local Plan 2019-36 Public Consultation (Regulation 18) does not justify an unfavourable rating, and that a rating of ‘Neutral Impact’ is appropriate.

---

1 http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736  
2 Response from Horsham District Council, ID #724053 dated 21/05/2019  
We consider the site should be scored as having a ‘favourable impact’

The Local Plan Review identifies that the Boldings Brook floodplain is not proposed for development and that a range of floodplain enhancement measures have been identified. Such enhancements include the delivery of a two-stage channel through the southern half of the site (Rookwood Golf Course Draft Environmental and Technical Feasibility Report, PBA 2017). Rainwater will be stored in attenuation ponds on site, which would also be designed to provide biodiversity benefits, and then gradually released into the Boldings Brook and Chennells Brook. There is an aspiration for biodiverse roofs to be installed on the buildings, which will attenuate rainfall at source.

The Local Plan Review states that it will be necessary to ensure no further flood risks are generated, because of the development, either on site or downstream. Any part of the development within the 1 in 100 annual probability plus allowance for climate change flood extent will incorporate a floodplain compensation scheme to demonstrate that there will be no detrimental impact on floodplain storage. This will also avoid increasing flood risk that the development will not increase flood risk either on site or to existing properties downstream (see Section 6 of the Draft Environmental and Technical Feasibility Report).

The development could serve to reduce the flood risk to the surrounding area, for example existing properties along Redford Avenue currently shown to be located within Flood Zone 2 ‘Medium Probability’. Naturalising the unnamed watercourse and/or implementing flood relief mechanisms in this location would reduce flood risk on sites and can be designed to reduce flood risk to the surrounding area, providing bettermen to the local residents and removing the properties from the Flood Zone 2 ‘Medium Probability’.

The Landowner has ambitious objectives for the site to ensure that the future development minimises its contribution to the climate change and is adaptable to the effects of climate change. In accordance with the scores applied to other large scale sites making similar commitments, we consider that this would have a ‘favourable impact’

A site-wide energy strategy is to be prepared in parallel with the masterplan to ensure that the scheme minimises its contribution to climate change. This will focus on ensuring that carbon savings following Lean Green and Clean principles are embedded into the scheme from the outset. The aim is to exceed the carbon saving targets set out in the new Local Plan:

- **Lean**: The aim will be to ensure that that homes use less energy. Heating/cooling requirements will be minimised via a high standard of building specification (the ‘fabric first’ approach) combined with sustainable design principles including building layout, orientation, floorplan configuration, over-shading, and glazing specification to avoid over-heating. The landscape strategy (including the role that this plays in providing shading) will be worked up in parallel with this. Efficient boilers (and/or similar plant) and energy efficient appliances will ensure that energy demands for water heating and general electricity consumption will be minimised.

- **Clean**: The energy strategy is to investigate the feasibility (in both energy and cost terms) of providing a district
heat network on the site, including the potential to connect to an expanded network serving other new developments.

- **Green:** The scheme will maximise feasible opportunities to generate renewable energy on-site. Technologies within this field are advancing rapidly and will need to be re-appraised and selected at the planning application stage. At this point in time we anticipate that air source heat pumps and photovoltaic panels are likely to be suitable solutions for the form of development being proposed (i.e., medium density residential).

The energy strategy is also to investigate the potential for the scheme to contribute to off-site carbon offset schemes to further reduce its carbon output.

In addition to the carbon performance of the buildings, the scheme will support a population that is able to live in less carbon-intensive manner, particularly in respect to transport. The site's location in close proximity to the district's largest town centre, alongside other major employment and leisure facilities ensures that the distances that residents will need to travel will be minimised, and offers genuine modal choice for those trips including walking, cycling, and public transport (with car use as a last resort). For those residents with cars, electric vehicle charging points will be provided within the scheme (including the capacity to increase these through the life of the scheme). This will be supported by rigorous Green Travel plans. The highest feasible standards of broadband infrastructure will be implemented to enable home working (reducing the need to travel).

The landscape scheme will include a significant programme of tree planting to provide carbon capture and natural shading/cooling (helping to offset the urban heat island effect and to provide relief in times of extreme heat), linked into a broader biodiversity net gain strategy. The landscape scheme will also incorporate Sustainable Urban Drainage Systems to ensure that the site can manage extreme rainfall without increasing the risk of surface water flooding on the site or downstream.

### Housing

We consider that the site proposals would have a *very positive impact* in housing terms:

- The site will deliver 1,000+ new homes.
- The site is on the edge of the existing built-up area of Horsham, which is the largest settlement in the district and therefore most capable of sustainably accommodating significant growth.
- This will include a mix of types and sizes suitable for the range of household needs identified in the SHMA, including homes for families, older persons, first-time buyers. It also offers potential for self/custom build.
- The development will also include a range of tenures, including affordable housing in line with local plan policy requirements (again, addressing specific housing needs).
- Notwithstanding the small sites target, the deliverability of the new Local Plan’s housing targets will be dependent on identifying and delivering a number of large strategic scale sites such that are attractive to a range of residential developers with the capability to deliver at scale.
- A design-led approach is to be taken to determining the appropriate scale/quantum of development which will ensure that the residential density of the site is optimised.

We consider that the above should be assessed as a *very positive impact*.

### Education

We consider that the site proposals would have a *very positive impact* in education terms:

- The emerging masterplan for the site includes a primary school and children’s nursery. Assuming a 2-form entry primary school (420 pupils), this will provide capacity well in excess of the estimated yield form the
The development will generate a secondary school child yield of 162-180 pupils plus 36-40 sixth formers (as per the Infrastructure Delivery Plan). This is insufficient to warrant the provision of a secondary school on-site, nonetheless the scheme will generate CIL funds to facilitate the expansion of existing schools (or provision of new schools) in line with a district-wide strategy.

### Health

We agree with the **neutral impact** score:

The emerging masterplan for the site indicates capacity for around 1,100 homes, which would result in a resident population of around 2,500 people (based on an average household size of around 2.25 persons). This will require the provision of around 1.1 additional GPs. This is insufficient to justify the provision of a new GP surgery on the site, which would be too small to be viable/suitable for the NHS (and/or other primary health care providers). CIL funds generated by the development will be available to facilitate expansions of existing primary healthcare facilities (or provision of new facilities) in line with a district-wide strategy. Existing facilities are easily accessible from the site by foot, cycle, public transport and car (this includes the Courtyard and Park Surgeries which are both within 1 mile of the site).

### Leisure/recreation and community facilities

The emerging masterplan for the site will have positive and negative impacts on leisure/recreation and community facilities. On balance, our view is that it will be a slight positive, therefore we consider that a **‘favourable impact’** score would be most appropriate.

The development of the site will involve the loss of a golf course. However, public access to use the majority of the site is currently subject to a charge, and it is an inhospitable environment for prospective users other than golfers. This is an exclusive recreation facility that provides health and well-being benefits to a relatively limited number of people (the number of golfers using the site is reducing in line with broader national trends), therefore the value of the existing facility in human health terms is limited (and gradually falling). Accordingly, its loss would result in only limited harm.

Redevelopment offers the opportunity to open up the whole site to the public (on a no fee basis) as well as future residents and provide extensive areas of high quality useable greenspace. We would expect this shift in the leisure/recreation role of the site to result in human health benefits to a much greater number of people than the existing use.

The masterplan includes improvements to wider connectivity particularly for pedestrians and cyclists, helping to piece together wider networks (cross refer to the Infrastructure Delivery Plan). This will deliver further human health and recreation benefits to the wider community.

The emerging masterplan includes an indoor multi-purpose community hall/facility. It will also generate CIL funds and additional customers to help support/improve existing leisure/recreation facilities.

Existing facilities within Horsham are easily accessible from the site by foot, cycle, public transport and car.

### Transport

We consider that the site offers the opportunity to deliver **very positive** impacts in transport terms.

Rookwood Golf Course is the closest strategic site option to Horsham town centre, which is the largest town in Horsham District, and therefore with its close proximity to the range of available employment, services and facilities, it will be highly sustainable compared to other strategic site options in the District.

Horsham town offers a variety of retail and leisure facilities, along with significant employment opportunities, schools and healthcare facilities. Horsham Railway Station is located within two miles of the site, and is easily accessible on foot and by cycle. The 51 bus services provide connection (via a short walk) from the site to both Horsham town...
The development itself will reduce the need to travel, with the provision of a primary school and local centre. Opportunities to provide new or improved public transport services have been explored; it is considered likely that the development is of a sufficient scale that it would be able to support a commercially viable bus service, connecting the development directly to Horsham town centre, and a range of other destinations depending on the route option selected. Metrobus has already signalled potential support for an extension of their services. If agreement cannot be secured to extend an existing service, then a new route will be required and there are several routes available which this could take. Improved local bus services will also provide benefit to existing residents and employees of Horsham town, enabling mode shift away from the private car for an increased number of people.

Figure 1 shows that already there is a relatively low proportion of people travelling by car to work (based on 2011 Census data at LSOA level) from this area, with only the town centre area being lower. The site therefore offers the most sustainable location for growth in terms of reducing the levels of private car travel in the district, and therefore congestion, when compared to all others strategic development sites under consideration.

Figure 1: LSOAs with Lower Car Mode Share for Travel to Work Than LSOAs Covering Rookwood Golf Course
Refer to the following appendices for further information:
Appendix E – Transport Constraints Plan
Appendix F – Transport Feasibility Report

<table>
<thead>
<tr>
<th>Other Infrastructure</th>
<th>The scheme will include up to date communications infrastructure in line with the capability of providers. We consider this to be a standard component of utilities provision in any major site. Score agreed as neutral in order to be consistent with other sites.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Economic impact</td>
<td>The NPPF makes it clear that local plans should adopt a joined up approach to planning to meet the needs of housing and employment development, recognising that they are inter-dependent on one another. The fact that the site is proposed for allocation for housing does not exclude it from having a positive economic impact. Indeed, in our view it will have a demonstrably favourable impact.</td>
</tr>
</tbody>
</table>
The site is located on the edge of Horsham which is the district’s main employment location. The town centre and non-central employment areas are easily accessible from the site by foot, cycle, public transport and car. The A24 and train station provides access to other main employment locations beyond the town.

The provision of a broad range of housing types, sizes, and tenures will have a positive impact on local labour supply, ensuring that the workforce needs of the local economy can be met locally (i.e. avoiding the inefficiencies and costs associated with commuting from further away), and ensuring that the workforce benefits from suitable housing.

The scheme itself will generate significant long term temporary direct and indirect (supply-chain) jobs during the construction stage plus construction related training opportunities (including apprenticeships). A small number of permanent jobs will be created in the school, nursery, and local retail provision – this will significantly outweigh the loss of existing golf related jobs.

<table>
<thead>
<tr>
<th>Retail</th>
</tr>
</thead>
<tbody>
<tr>
<td>The scheme will have a <strong>favourable impact</strong> in retail terms:</td>
</tr>
<tr>
<td>Horsham Town Centre (the main retail centre in the district) is easily accessible from the site by foot, cycle, public transport and car.</td>
</tr>
<tr>
<td>The introduction of around 2,500 additional residents will materially increase the catchment area spending capacity of the town centre. The Council’s Retail and Leisure Study (2017) estimates 2021 total retail expenditure (convenience and comparison goods) for Horsham residents to be in the region of £7,500 per person per annum.</td>
</tr>
<tr>
<td>The value of the retail expenditure of the proposed development (1,100 homes) will be £8.25m per annum on this basis. This will have a positive impact on its vitality and viability for shopping, leisure, and other main town centre uses, and support opportunities for regeneration.</td>
</tr>
<tr>
<td>The emerging masterplan for the site will include local scale retail (suitable for top-up shopping and other localised service needs). This will be scaled to ensure that there is no trade diversion from the town centre (ensuring no adverse impacts).</td>
</tr>
<tr>
<td>The practical requirements for retail and hot-food deliveries will be designed into the scheme.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Deliverability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advice from the landowner’s appointed Development Consultant (Avison Young) confirms that the proposed development is deliverable from a commercial perspective.</td>
</tr>
<tr>
<td>The site is expected to become available for development in 2022/23. It is anticipated that a planning application will be prepared/submitted well ahead of this in order that development can commence promptly following vacant possession. The Landowner is currently appraising alternative delivery options. We would expect the site to take around 5 years to build out, assuming around 3 outlets (including a Registered Provider). The Landowner will have possession of the site in full, with no need for further site assembly.</td>
</tr>
<tr>
<td>Preliminary assessment work has identified the need for various infrastructure works, including highways. We are not aware of any unusual or insurmountable barriers to deliver of this.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Viability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Viability work undertaken by the landowner’s appointed Development Consultant (Avison Young) confirms that the proposed development is expected to be viable (based on current market conditions). This accounts for policy compliant affordable housing and other infrastructure cost assumptions, plus CIL.</td>
</tr>
<tr>
<td>Arrangements for the maintenance of the common parts of the scheme are yet to be agreed, however at this stage it is expected that this will be the responsibility of the developer (then homeowners/freeholders) and will be funded via service charges.</td>
</tr>
<tr>
<td>The landowner is the Council. Accordingly, any land value generated will by default be used in the public interest (a clear significant public benefit).</td>
</tr>
</tbody>
</table>
Development Quality

Refer to Concept Masterplan and Vision report at Appendix B

The Local Plan Review Regulation Document acknowledges that the site promoter has a clear vision for the development based on very high quality design and landscaping with green open spaces and views incorporated throughout the development, seeking to provide a characterful, permeable and liveable community.

We would concur with this assessment of our vision, and would like to add the following:

**Private Amenity Space**

Residents would be afforded their own spaces that are private and can be personalised, either in the form of terraces, garden spaces or garden courtyards (reflecting areas of historic townscape). This would create a series of communal spaces in the form of gardens and courtyards offering residents additional outdoor space; allowing for informal play and relaxation; encourage social interaction and help foster the creation of the village community. Wider parkland and woodland spaces become the houses' borrowed landscape, within which residents can walk, play and exercise.

**Heightened Immediacy of Nature**

Filtered views between garden spaces to woodland beyond form strong visual links that reinforce this green and natural character. New homes retain these connections with units nestling into the edges of the retained woodland areas, primary frontages facing onto the surrounding parkland and upper floors into the tree canopies. Pedestrian access around the outside new blocks is encouraged to keep the parkland open and free from secondary garden boundaries, with new natural landscape buffers used to create comfortable stand off distances to properties.

**Inward/Outward Connections**

A strong relationship with the surrounding natural environment, embracing the landscape within the development. Green space will be drawn from the open space and woodland into the heart of the development, and views of the surrounding landscape will act as a backdrop to development.

**Layout/Views/Connections**

Strong perimeter blocks, some with internal parking, reduces external infrastructure, creates a simple grid of movement and view axis and defines an underlying structure of the development. Long linear routes create a series of long views and grand vistas through the village - making it easy to wayfind - as well as maintaining visual links to the surrounding woodland and countryside. Development planned around a semi-private courtyard. Cars are restricted to the central area, creating shared external spaces between the sitting room frontages and the existing walled garden walls. Around the perimeter of the blocks, a simple treatment of buffer planting and lawn will draw in the wider landscape and form a strong link between the open space and the new homes. Combination of built form and planting creates a sequence of attractive views that slowly reveal the development and leads the visitor into the site. Glimpsed views are opened up through the new buildings and walls to the spaces beyond. Smaller scale detached homes nestle into the landscape. Each home is envisaged as a pavilion within a courtyard - preserving the walled garden narrative of the wider village development, and providing each unit with a private space linked to the estate landscape beyond.

The retained perimeter of mature trees and woodland creates a sheltered and natural environment, with the open parkland character preserved as a public space for all to enjoy.

**Massing**

Massing steps up from sensitive edges, allowing for terraces on these natural edges that can enjoy this amenity. The car parking is situated within the walled court, of the road and away from the communal central space.

**Materiality/Building Design**

The main material is brick, with bronze colouring as a highlighting material. The architecture is simple yet of high quality and subservient to the colourful natural landscape.

**Vision**

There is an opportunity at Rookwood to create a development that uses the setting as an advantage, distinguishing it from other developments. In amongst the green space, pockets of development can be created; each with a distinct feel, all benefiting from the rural setting, and all...
contributing to the creation of a truly individual development. The ambition is to create a place that is inspiring and peaceful.

Avison Young

30th March 2020.
Contact Details

Enquiries
Nick Alston
020 7911 2056
Nick.alston@avisonyoung.com

Visit us online
avisonyoung.co.uk