Appendix A
Comments on Interim Sustainability Appraisal
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 (the ‘Site’), Horsham District Council. The purpose of this representation is to provide the Local Planning Authority with our comments on the Interim Sustainability Appraisal (SA).

2. Response

2.1 The site is referred to as ‘Land at Rookwood, Horsham’ in the draft local plan (site ref. SA395). It is referred to as Site SA394: Rookwood (Urban Extension) in the SA. To avoid confusion we recommend that the SA is amended to use terms consistent with the draft local plan.

2.2 We do not fully agree with the conclusions of the Interim SA in respect to the Site as presented at Appendix B. We request that the assessment is re-run having regard to the site specific evidence provided as part of our submission to the Call-for-Sites exercise, our representations to the Regulation 18 consultation (specifically in respect to Strategic Policy 14 and the Potential Housing Allocations) and the details set out in this representation.

2.3 We provide comments against each of the SA Objectives to helpfully inform the re-appraisal, including recommended revised ‘Scores’ in Table 2.1 below:
### Table 2.1 Interim SA Response Table

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Current SA Score</th>
<th>Comment</th>
<th>Recommended SA Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA 1: To provide affordable, sustainable and decent housing to meet local needs</td>
<td>++</td>
<td>Agree.</td>
<td>++</td>
</tr>
<tr>
<td>SA 2: To maintain and improve access to centres of services and facilities including health centres and education.</td>
<td>++/ −?</td>
<td>The risk of existing facilities becoming over capacity will be mitigated via capacity upgrades secured via CIL and/or s.106 contributions.</td>
<td>++</td>
</tr>
<tr>
<td>SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.</td>
<td>+</td>
<td>The emerging masterplan for the site includes a primary school, nursery, and local scale retail/services scaled to meet the local needs of future residents. This will ensure that new social infrastructure and services are provided that complement the town centre. The increase in housing provision (including affordable housing) will ensure that housing is provided in the local area as needed for the local workforce (to sustain the local economy). Agree with score.</td>
<td>+</td>
</tr>
<tr>
<td>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.</td>
<td>0</td>
<td>Agree with SA approach and score</td>
<td>0</td>
</tr>
<tr>
<td>SA 5: To improve public health and wellbeing and reduce health inequalities.</td>
<td>+/−?</td>
<td>The provision of around 1,000 new high quality homes across multiple tenures (including affordable) for households in need (who would otherwise be either homeless or living in unsuitable housing), will have a significant positive impact on human health and wellbeing. 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). 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 to provide 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 broader human health benefits to the wider community. Potential noise impacts associated with the proximity of the A24 can be mitigated through</td>
<td>+</td>
</tr>
</tbody>
</table>
appropriate design and building specification to ensure that this does not materially affect the residential amenity/quality of future residents.

Health facilities will not become over-capacity as part of the proposed development. Mitigation in the form of expanded existing facilities or provision of new facilities will be secured via CIL and/or s106 mechanisms.

We agree that the site offers significant positive effects against this objective, but disagree with the potential negative considerations identified in the SA (as explained above). Accordingly we consider that a more positive score is warranted.

SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.

Appendix A of the Sustainability Appraisal states that ‘Sites that are within 400m of a locally biodiversity or geodiversity designated site or area of ancient woodland may have an uncertain minor negative (-?) effect’. The Site is within 400m of Warnham Local Nature Reserve, and because of this a score of ‘minor negative’ could be appropriate, as opposed to the current score of ‘significant negative’.

Appendix A also goes on to say ‘….while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.’

The scheme has committed to deliver a 10% net gain in biodiversity within the site, protect and buffer the adjacent Warnham Local Nature Reserve, and provide coherent green infrastructure network within the Site. Given the above, a combined score of ‘minor positive and minor negative’ impacts would seem to accurately reflect the range of positive and negative impacts which may result from development of the site.

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.

We have identified that the Council’s 2020 Landscape Capacity 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. 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 Planit study identifies there are areas of moderate capacity (Areas 2, 4, 5, 6, 9 and 10 to accommodate change). Thus, the landscape character area would 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.

A vision document has been submitted which identifies a number of design principles that would mitigate the impacts of the proposed development. Given that the council owns the land, the design principles could be utilised through any contract of sale, and design quality would also be controlled through the use of a design code to ensure that these mitigation principles would be delivered.

SA 8: To conserve and/or enhance the

Grade II Listed Buildings (Mill House and Warnham Mill) – These buildings are located circa
qualities, fabric, setting and accessibility of the District’s historic environment.

180 metres from the site boundary, separated by significant belts of woodland, and will not be viewed within the context of any development. The proposals will have a negligible impact on this heritage asset.

Warnham Court, a Registered Park and Garden is located 100 metres from the western boundary on the opposite side of the A24 – However, there are significant belts of woodland on either side of the A24, which serve to screen any development from views from within the park. The proposals will have a negligible impact on this heritage asset.

Grade II* listed Warnham Court is located in 1 km from the site boundary, given the significant amount of intervening woodland, and distance from the site, the proposals will have negligible impact on this heritage asset.

Given that the site is over 1km from the nearest conservation area around Richmond Road and 1.5 Km to the two other conservation areas within Horsham Town Centre, given the distances between the site and these locations, the proposals will have negligible impact on these heritage assets. Moreover, should the design principles adopted within the submitted Vision Document be adhered to, the proposals could be seen to be minor beneficial, given that many of the historic design characteristics will be referenced through the detailed design and design code process, and therefore reconnecting the site with its historic past.

SA 9: To make efficient use of the District’s land resources through the re-use of previously developed land and conserve its soils.

Score agreed. However we note that the district is unable to meet it’s assessed development needs without allocating greenfield land for development.

SA 10: To conserve natural resources, including mineral resources in the District

Score agreed. There will not be an opportunity to extract minerals from the site prior to redevelopment, therefore redevelopment will sterilise the mineral extraction opportunity.

SA 11: To achieve sustainable water resource management and promote the quality of the District’s waters.

The emerging masterplan proposes a SuDS scheme which will mimic the natural drainage regime of the site and promote sustainable water resource management. Rainwater will be stored in attenuation ponds on site, which will be designed to be of benefit to biodiversity, and then will gradually release into the Boldings Brook and Chennells Brook. The surface water management system would be designed to comply with the requirements of the risk-based approach to setting the appropriate level of treatment, with a focus on the use of SuDS components, as set out in CIRIA C753 ‘The SuDS Manual’, as a minimum. The implementation of an integrated SuDS scheme would also achieve multiple benefits with respect to amenity and biodiversity in line with the wider sustainability, ecology and landscaping aspirations for the development.

There will be no discharge to surface water sewers as part of the development, meaning the site will not place any additional pressure on existing surface water infrastructure in the area. Therefore, it is reasonable to state that the development will have a ‘Minor positive effect’ on water resources.
### SA 12: To manage and reduce the risk of flooding.

The development presents an opportunity to incorporate a scheme aimed at naturalising the floodplain of the Boldings Brook, which could provide a reduction in flood risk to the site and existing properties adjacent to and downstream of the site. There is also potential to improve the design of the Boldings Brook and Chennells Brook in order to alleviate pressure in the area in terms of flood risk. Improving the design of the channels could also provide benefits in terms of water quality and ecology and contribute towards the Boldings Brook achieving its objectives under the Water Framework Directive (WFD). This demonstrates that the development could provide a range of flood risk and ecological benefits. Therefore, it is reasonable that the development will have a 'Minor positive effect' on flooding.

### SA 13: To reduce congestion and the need to travel by private vehicle in the District.

The site is in a sustainable location in terms of access to shops, services, and employment via non-car modes of transport. The emerging plans include proposals to further improve this. Green Travel Plans (secured by s.106 obligation) will ensure that future resident transport mode behaviour is more sustainable than the typical position. The impacts of any additional traffic generated by the development will be mitigated via s.106 obligations should the capacity of existing infrastructure require upgrading.

We agree with the positive component of the scoring but do not agree with the negative.

### SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.

Existing air quality in the surrounding area has not been predicted or measured to exceed either the EU Limit Values of the National Air Quality Objectives in recent years. The Site is not located within or close to an Air Quality Management Area (AQMA) either within the District or within neighbouring Districts, the closest AQMA being located >9 km from the Site boundary. Furthermore, the Site is not connected to this AQMA by a direct road link. The Proposed Development has the potential to generate traffic (and onsite heat/power) related emissions to air and introduce new locations that are sensitive to air quality. Additional road traffic could lead to increased congestion and emissions in the town centre, however the site benefits from good access to active travel and public transport modes.

However as the site is on the edge of the largest town in Horsham District and is of a scale that can provide a primary school and local centre, there is realistic opportunity to reduce travel and to travel more sustainably as well as use low carbon energy sources (to be delivered as part of the design) that would not be as effective or deliverable for smaller or more remote sites. Both of which have the potential to reduce emissions and deliver substantial modal shift, which would provide positive air impacts compared to other alternative sites.

### SA 15: To minimise the District’s contribution to climate change and adapt to unavoidable climate change.

The provision of housing on this site will not increase the overall population of the district and broader Housing Market Area. Population growth will continue regardless. New households will simply live elsewhere. Providing housing in the most sustainable locations such as this site which are highly accessible and offer the best prospects of modal shift away from cars, and in highly energy efficient schemes will minimise the district’s...
contribution to climate change compared to the alternatives. Accordingly, we consider the site should be scored more positively.

| SA 16: To facilitate a sustainable and growing economy. | + | Agree with score/assessment |
| SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District. | ++ | Agree with score/assessment |

Avison Young
30th March 2020.