

Southwater Neighbourhood Development Plan Regulation 16 Consultation - Summary of Representations

Reference	Policy No. Paragraph	Summary
Ref #1 Sports England	General	1. General comments regarding protecting sport pitches and loss of playing fields, which do not mention specific points from within the plan.
Ref #2 Local Resident	General	1. Representation withdrawn
Ref #3 North Horsham Parish Council	Support	No comments
Ref #4 Waverly BC	Support	No comments
Ref #5 Savills on behalf of Christ's Hospital	Policy SNP1, SNP7, SNP10, SNP12, SNP13, SNP17, SNP18, SNP19, SNP20, SNP21, Built Up Area Boundary	<ol style="list-style-type: none"> 1. The respondent is responding on behalf of Christ Church Hospital (known as the foundation here on after). 2. SNP1: <i>'The policy should be amended so that it recognises the importance of Christ's Hospital settlement, and actively encourages development around the station'</i>. 3. SNP7: SNP has designated the some of the foundation's playing fields without recognition that this is private land and not accessible to the public. Point 1 requires better facilities during any development which the respondent argues to not be reasonable. Where the policy states that development on these fields would conflict with the criteria, it should only be permitted when overwhelming within the interest of the Southwater community, the respondent argues this is not accessible to the public and could restrict the foundations future operations, i.e. any new facilities needed. 4. SNP10: respondent argues that the policy repeats national policy and guidelines. 5. SNP12: Policy needs evidence base to support it or be omitted. 6. SNP13: <i>'This policy ignores the significant potential that Christ's Hospital Station (one of the Parishes major assets) offers with its good rail connections, and potential to encourage sustainable modes'</i>. 7. SNP17: Respondent deems the policy to be too prescriptive should be amended. 8. SNP18: Clarification is sought on the terminology <i>'(regardless of land ownership)'</i> and greater in <i>'trees or new woodland of greater environmental value should be provided'</i>. The greater part adds ambiguity to the development management process.

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		<p>9. SNP19: The requirement of a Heritage Statement is argued to be too ‘onerous’ on developers’ and landowners’ costs.</p> <p>10. SNP20: School may wish to undertake work that’d only be in interests of the school’s, thus constrained by the policy</p> <p>11. SNP21: The policy makes no provision for employment space, which the foundation has been promoting around Hop Oast roundabout which has been deemed to be deliverable in the site assessments. The respondent recommends the following modification to 21.3:</p> <p style="padding-left: 40px;">i. <i>‘Policy SNP 21.3 states that: Outside Key Employment Areas and Parish Employment Areas, small scale business units are supported where they are in accordance with the development plan there is an identified need’.</i></p> <p>12. Built Up Area Boundary: The respondent raises concerns at the proposed reduction to three parts of the Christ Hospital Built Up Area Boundary. The foundation cannot see any policies in the Horsham District Planning framework which allow for this nor in the Issues and Options 2018 review of settlement boundaries to reduce the settlement boundary. The respondent continues that the shaded blue area found in Figure E (Appendix A) of the Landscape Sensitivity Study effectively contradicts this as it shows that a larger BUAB may in fact be more appropriate, with the document concluding that the settlement can include additional development, thus contradicting the BUAB reduction. Another objection to this is raised in relation to recent planning permission obtained (DC/19/0423), an application which the Parish Council did not object to. Furthermore, changes would split Christ’s Hospital into smaller settlements which goes against the HDPF. The respondent recommends that the BUAB is extended to the east.</p>
Ref #6	Oppose	<p>1. <i>‘I object unreservedly on the grounds of overdevelopment, overcrowding , noise , congestion and denial of remaining farmland’.</i></p>
Ref #7 Batcheller Monkhouse	Have comments. Policy SNP1, SNP2, SNP4. Sustainability Appraisal. Southwater Landscape Sensitivity and Capacity Study.	<p>1. The respondent argues that the plan’s core principle (SNP1) is not sustainable due to the criteria of having development within 15 minutes walk of Linot Square, whilst there is insufficient shops and businesses. Therefore, relying heavily on Horsham for such services and Christ’s Hospital and Horsham rail stations. The core principles states that Southwater will only grow outside of the settlement boundaries yet fails to note the Horsham District Council’s Local Plan Review which is considering new settlement boundaries, Towers Hill is one that has been recommended for a boundary in the Issues and Options document 2018. The respondent argues with 1.4km distance to Horsham centre Tower Hill will have better sustainability as Southwater has no train station.</p> <p>2. Questions are raised on the sustainability of the allocated site due to its distance to Christ’s Hospital Station. It is argued that sites 9 and 13 have potential to provide a pedestrian flyover to Horsham, creating better pedestrian access to Christ’s Hospital in ten minutes, quicker than from Southwater centre.</p>

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	Site Assessments. Built Up Area Review.	<ol style="list-style-type: none"> 3. Respondent argues that the plan is solely reliant on one site for providing local housing need with concerns that the highways impact would be severe, failing to meet requirements in the NPPF and potentially seeing a housing shortfall. 4. The respondent argues that the allocated site is ‘very much detached any train station’ resulting in a struggle to avoid use of private vehicle, with one large allocation leading to a concentration of vehicle traffic. It is argued that sites 9 and 13 would help prevent such concentration of traffic with better proposed pedestrian accessibility to Chist’s Hospital Station. This would not just be helpful for those in employment or education, but also those in the identified need for the older population, circa 72 dwellings, who will also need good accessibility to good transport links. 5. Option 3 in the SEA/SA only considers Site 1 and 2 in Tower Hill, which were discounted and as they did not have the capacity to accommodate the plan’s housing need. However, Option 3 failed to recognise that 7 sites in total were put forward to the Tower Hill area. 6. The respondent agrees with the medium landscape value and medium landscape susceptibility and sensitivity given to sites 9 and 13 in the Southwater Landscape Sensitivity and Capacity Study, however, due to the ‘enclosed nature of the area’ development could be ‘more substantial’ and still having the same impact. 7. The respondent accepts the Site assessment conclusion on site 9 being sustainable in line with the NPPF but not conclusion that the site is <i>‘not well related to the existing urban area and would be fairly isolated. Given the close proximity to both Horsham, Christ’s Hospital and Southwater, as well as the existing development in Tower Hill itself’</i>. 8. The respondent notes that there are no pavements on Two Mile Ash Road, which both Site 9 and Site 13 gain access off of with site 9 having pedestrian access to the north of the site to Horsham. The respondent argues that an indicative layout has been proposed for both sites allowing for a public path through Site 13 allowing for good pedestrian access to Christ’s Hospital, providing the opportunity for a public foot bridge over the A24, with a by foot journey time of 10 minutes. The respondent again agrees with the Southwater Landscape Sensitivity and Capacity conclusions on both sites but development could be ‘more substantial’. 9. The respondent does not agree with the Heritage Statement conclusions of the sites’ impact on Grade II Listed Sawyerland which they argue ‘could easily be mitigated’. They note that proposed allocated site in the plan was has a Listed Building on the site with a proposed 100 meter buffer around it, the same came be achieved on Site 13. 10. The site assessment states that the site benefits from a footpath and bridleway which do not directly connect to the main highway, thus limiting their usefulness, with them needing to be re-connected. The respondent states that they propose to re-connect the existing public footpaths could be re-connected. The site criteria for public footpath upgrades on the proposed site allocation can be applied to Sites 9 and 13, this would also benefit the community of Tower Hill. Question raised on plans conclusion of site 13’s achievability stating that access requires cooperation with neighbouring site, respondent questions as both sites 9 and 13 have jointly promoted sites have promoted

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		11. Responded argues the plan has 'overlooked HDC's conclusion for a secondary settlement boundary for Tower Hill.
Ref #8 Henfield PC	Support General	1. <i>Supports the plan and endorse policies SNP1.3, SNP3.1 and SNP10.1.</i>
Ref #9 Denne NC	Support General	1. <i>'We fully support maintaining the strategic gap between Horsham and Southwater in terms of restricting housing development and maintaining the green aspect over Horsham Town in the Tower Hill and Denne Hill areas'.</i>
Ref #10	Support with Modifications	1. <i>I feel that the sports facility will be an asset to the area, however the additional housing will put enormous pressure on the infrastructure especially with regard to increased traffic and utilities</i>
Ref #11	Oppose General	1. Opposes plan as Southwater has taken enough housing, closing 9 holes on golf course for housing would negatively impact the facility. The area is short on basic facilities (schools, medical facilities and transport infrastructure) whilst the road from the park and ride is too small and dangerous. The proposed allocation proposes another floodlight sports pitch when there already some on 'the other side'. Suggest that that current community facilities are improved.
Ref #12	Oppose General	1. Argues that the housing is not needed and that schools, doctors and police should be provided before housing.
Ref #13	Oppose General	1. Argues that the housing is not needed and that schools, doctors and police should be provided before housing.
Ref #14 Southern Water	Support General	1. <i>'we have reviewed the document and are pleased to note that our comments submitted for the Regulation 14 consultation have been addressed, and we therefore have no further comments to make'.</i>
Ref #15	Support SNP7	1. The golf course should not be reduced to 9 holes, as it will reduce the number of players and is home to wildlife such as deer, buzzards, weasels, slow worms etc which would be negatively affected by the below.
Ref #16	Support SNP.7.1&2	1. Wishes to the retention of all holes at the Golf Course.
Ref #17	Support 3 - SNP1	1. Supports core principles, especially no coalescence between settlements. 2. Argues that there is limited capacity on the highway network and housing development should be limited.

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	4 - 4.24 5, 5.7 - SNP7 7 - SNP13.4 8 - SNP19.2	<ol style="list-style-type: none"> 3. Supports the designation of open spaces, if development is proposed then alternative improved facility is needed. 4. the provision and maintenance of non-motorised routes is supported. Any development proposal which may affect any of these routes, visually, aesthetically, or in any other respect affect such a route should be refused. 5. Parish Heritage Assets are vital to a community's sense of identity and should be protected. 6. Include Horsham Golf Club in the Community Infrastructure list (para 2.23)
Ref #18 Thakeham Homes Ltd.	Policy SNP2	<ol style="list-style-type: none"> 1. Respondent supports the plan but raises concerns regarding the number of housing in Policy SNP2, which has been raised previously in their representation at Regulation 14 consultation, it is felt that this hasn't been addressed. It is argued that a broader distribution of housing within the Parish <i>'should be adopted in order to maintain the vitality of smaller settlements'</i>. The single allocation may falter the plan's delivery of housing, the respondent is <i>'concerned that the plan as presented does not provide sufficient resilience for ensuring delivery and we would urge that the Local Authority and examiner seek to address this issue in full before any recommendations for a referendum is made'</i>. 2. The housing number (420 – 460) is noted but the respondent feels that the plans mentioning of a housing shortage indicates that a greater quantum is needed over the plan period. 3. The respondent notes that the site they represent, Land to the West of Worthing Road is less than 1km from Horsham Town Centre, a wider range of facilities and services. It is well connected to the BUAB, unconstrained by national policy designations, with minimal need for infrastructure. 4. The respondent states that the site is available in line National Planning Policy Guidance (NPPG) Paragraph 21 for residential development within the next five years, as they have a legal agreement with the landowners. 5. Respondent argues that their site could deliver much needed housing, an application has been made on the site already (Ref: DC/18/0944) which has supporting documents which demonstrate suitability and should be allocated in the plan. 6. With a planning application (DC/18/0944) being determined and the respondent's track record in delivering housing shows they are in line with NPPG Paragraph 21. 7. <i>'For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. As such, we consider that the site could provide much needed housing development within the plan period'</i>. 8. The respondent concludes that <i>'As such, it is our view that the SNP should include this site to ensure that the NP strategy and District's spatial strategy is robust and resilient to change'</i>. 9. Attached is the site boundary of Land to the West of Worthing Road.

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Ref #19 Environment Agency	Support General	<ol style="list-style-type: none"> 1. <i>'We are pleased to see that the proposed allocation has been directed to the areas at the lowest probability of flooding and that it is located within Flood Zone 1'.</i> 2. <i>'We are also pleased that our comments from the Regulation 14 consultation regarding adding reference to ensuring the development connects to the main public sewer have been taken on board'.</i> 3. <i>'We note the proximity of the woodland, designated as a SSSI, and would recommend that the appropriate buffers are in place between the woodland and any development to ensure protection of the SSSI features'.</i>
Ref #20	Oppose	<ol style="list-style-type: none"> 1. It is noted by the council that the respondent opposes planned housing development at Horsham Golf and Fitness, however, this is not a proposed allocation in the Southwater Neighbourhood Plan. It is proposing to allocate the land FOR Formal/Informal Sports Areas (SNP7).
Ref #21	Support 3 - SNP1 4 - 4.24 5, 5.7 - SNP7 7 - SNP13.4 8 - SNP19.2	<ol style="list-style-type: none"> 1. Supports the Core Principles, especially that of no coalescence. 2. Argues that there is limited capacity on the highway network and housing development should be limited. 3. Supports the designation of open spaces, if development is proposed then an alternative improved facility is needed. 4. The provision and maintenance of non-motorised routes is supported. Any development proposal which may affect any of these routes, visually, aesthetically, or in any other respect affect such a route should be refused. Parish Heritage Assets are vital to a community's sense of identity and should be protected. 5. Parish Heritage Assets are vital to a community's sense of identity and should be protected. 6. Include Horsham Golf Club in the Community Infrastructure list (para 2.23)
Ref #22	Oppose SNP 7.1, 7.2	<ol style="list-style-type: none"> 1. It is noted by the council that the respondent opposes planned housing development at Horsham Golf and Fitness, however, this is not a proposed allocation in the Southwater Neighbourhood Plan. It is proposing to allocate the land for Formal/Informal Sports Areas (SNP7).
Ref #23	Support Policy 12, SNP 7.1, 7.2 & 7.3	<ol style="list-style-type: none"> 1. Respondent argues that it is essential that open spaces are retained for sake of protecting the environment and residents ability to enjoy open space with sporting facilities. 2. Argues that the Golf Course is a thriving and growing facility for other golf courses which are closing. 3. Building on open spaces designated for sport and leisure should be resisted.
Ref #24	Support	<ol style="list-style-type: none"> 1. <i>'I bring to your attention pages 11, 16, 17, 19, 19, 25, 33'.</i> 2. <i>'NB page 19 states The Golf Course as a formal/Informal Sports area (SNP 7.1)'</i>

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		<p>3. <i>'With restrictions on development (SNP7.2)'</i></p> <p><i>Please note: clarification has been sought by Horsham District Council on whether the whole of the representation was sent.</i></p>
Ref #25	Support with Comments SNP 7.1, 7.2, 13.4, 1, 1.3	<ol style="list-style-type: none"> 1. March 2019 document 'Review of Public Open Spaces in Southwater concludes the gold course meets the criteria of designation for 'informal/formal Sports Areas. Paragraph 5.8 states that it seeks to ensure that such spaces are maintained for current and future generations, considered essential for quality of life and vital to health and fitness, therefore the respondent supports Policy 7 of the plan. 2. Supports SNP 7.1 3. Supports SNP13 this aims to protect 'various, well used, rights of way', described as promoted routes on Policies Map. 4. Supports Policy 1 as any development on the golf course would conflict with the core principles. Supports 1.3 which states that development must result in the coalescence of the settlements of Southwater, Christs Hospital and Tower Hill, either with one another or Horsham town.
Ref #26	Support Para 5.7, 5.8 SNP7.1.	<ol style="list-style-type: none"> 1. <i>Respondent supports the proposed formal/informal sports areas designation of Horsham Gold course.</i>
Ref #27 Gladman Developments Ltd.		<ol style="list-style-type: none"> 1. The respondent wishes 'to highlight the issues with the plan as currently presented and its relationship with National and local planning policy'. The respondent describes how plans must meet the 'basic conditions' as set out in 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) before proceeding to referendum. The respondent notes paragraph 214 of the revised NPPF which states that which states that plans submitted on or before 24 January 2019 will be examined against the NPPF 2012, Southwater was submitted after this date. 2. The respondent notes the publication of the revised NPPF by MHCLG on 19 February 2019, setting out the Government's planning policies for England. Stating that <ol style="list-style-type: none"> i. <i>'Crucially, the changes to national policy reaffirm the Government's commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations'.</i> ii. Adding further paragraphs 13 and 14 of the NPPF 2019. 3. The revised NPPF states that Neighbourhood planning empowers local communities to deliver a shared vision 'for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing

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		<p>needs'. They also state other requirements such as general conformity with Local planning policies, not promoting less development and request a housing number from the LPA where one cannot be obtained.</p> <ol style="list-style-type: none"> 4. Respondent notes the updated Planning Practise Guidance published on 13 September 2018 providing clarity on the revised NPPF (June 2018). Whilst a draft neighbourhood plan must be in general conformity with policies of the adopted development plan, it must also provide flexibility and consider the reasoning and emerging evidence base informing the emerging Local Plan. For example, taking consideration for the up-to-date housing needs. <ol style="list-style-type: none"> i. <i>'Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan' (PPG Reference ID: 50-001-20160519).</i> 5. The respondent reaffirms that to meet the 'basic conditions' Southwater's neighbourhood plan must conform with the 'strategic policy requirements set out in the adopted Development Plan, this being The Horsham District Planning Framework (HDPF) which has a requirement of 16,000 dwellings between 2011 and 2031 (800 dwellings per year). The respondent notes that Horsham District Council is currently undertaking a review of the HDPF, this will cover the period from 2018 to 2036. <i>'With this in mind, Gladman suggest sufficient flexibility is provided in the policies of the plan to safeguard the SNP from conflicting with future development proposals should they be required'.</i> 6. With this, the respondent quotes section 38(5) of the Planning and Compulsory Purchase Act 2004: <ol style="list-style-type: none"> i. <i>'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'</i> 7. The respondent acknowledges that Policy SNP1 – Core Principles (SNP1.3), preventing coalescence can help keep the existing identities of existing settlements, however, <i>'the policy is ambiguous and appears to be an attempt to preclude any development whatsoever from coming forward in the gap between the three built up areas. In this regard there appears to be no supporting evidence to support this element of the policy, nor a description/map of the extent of land proposed to be protected, nor the limits on the scale of development therein'.</i> 8. Respondent argues that <i>'there is no justification within the SNP for the additional protection of land between the neighbouring settlements of Southwater Village, Christs Hospital and Tower Hill, and equally no matching policy in the Horsham District Planning Framework'</i> 9. The respondent also argues that there is no evidence that informs this proposed 'green gap' nor assessment of parcels of land between the named settlements and nor is there evaluation of their relative performance in preventing coalescence. Also there is existing built forms between these settlements such as the, A24, petrol garage, park and

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		<p>rise, businesses and farm buildings. <i>The existence of this intervening built-form serves to undermine the justification for policy SNP1.3, the implementation of which could prevent the inherent economic growth and development potential of these farms, businesses and hamlets.</i></p> <p>10. The respondent concludes that development should be assessed on its own merits, depending on landscape impact, with the policy creating a 'green belt by the back door'. The council have found no justification for protecting the gaps between the settlements in the neighbourhood plan area and for this reason SNP1 is in conflict with basic condition (e).</p> <p>11. On the issue of meeting Local Green Space criteria as set out in national planning policy examples of the examinations of Sedlescombe, Oakley and Dean and Alrewas neighbourhood plans which all saw Local Green Space deletions.</p> <p>12. The respondent argues that the informal Nature Reserve adjacent to Chesworth House does not meet the criteria set out in the NPPF for Local Green Space (namely paragraphs 99 and 100).</p> <p>i. <i>'Highlighted through a number of Examiner's Reports set out above and other 'made' neighbourhood plans, it is considered that the 'Informal Nature Reserve adjacent to Chesworth House' has not been designated in accordance with national policy and guidance and subsequently is not in accordance with the basic conditions.'</i></p> <p>ii. <i>'Whilst the Parish Council have sought to undertake some form of evidence base it does not overcome the failure to meet the specific policy requirements set out above with regards to the scale of land to be designated and therefore the proposed designation of LGS site b). In terms of meeting the second test there is no evidence base to support that this field is 'demonstrably special to a local community.' In relation to its beauty, it is not of any particular scenic quality. The designation of 'Informal Nature Reserve adjacent to Chesworth House' has not been made in accordance with basic conditions (a) and (d). Gladman therefore recommend that it be deleted as an LGS in its entirety.'</i></p> <p>13. The respondent concludes they are <i>'concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and is contrary to (d) the making of the order contributes to the achievement of sustainable development for the reasons set out above'.</i></p>
Ref #28 West Sussex County Council		<p>1. <i>The respondents describes The Strategic Transport Assessment of the Horsham District Planning Framework which tested the cumulative impacts of strategic development, identifying additional travel demand as a result of planned development. 'transport implications of development proposed by the HDPF on the highway network, identify the impacts and appropriate and feasible mitigation. As part of the HDC Local Plan Review the County Council are working in a technical advisor role with Peter Brett Associates for a new transport evidence base study. The forecast within this new document will include all Neighbourhood Plans either 'made' or developing in the District.</i></p>

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		<ol style="list-style-type: none"> 2. <i>'As previously stated at Reg 14, it is considered that due to the scale and location of the proposed site allocation in the Southwater Neighbourhood Plan, the level of growth proposed is not in accordance with the background level growth assumptions in the 2013 Strategic Transport Assessment'.</i> 3. <i>'A completed transport mitigation strategy, to be agreed with the Highway Authority, for the forecasted travel demand is required before the site is allocated for development in the Southwater Neighbourhood Plan'.</i> 4. <i>The respondent outlines their key concerns of the plan:</i> 5. <i>The proposed allocation is not in conformity with the adopted Local Plan and the transport forecasting assumptions used to evidence it.</i> 6. <i>The County Council, as Highway Authority, was not consulted over the transport assessment methodology, and therefore the methodology was not agreed.</i> 7. <i>The Capacity Assessment work undertaken by WSP for Southwater considers only the consented development of 540 homes at Southwater alongside the proposed development of a further 450 homes; it does not consider other development which is likely to contribute to A24 traffic, (notably Land North of Horsham and dwellings at Land west of Horsham not yet built or occupied in October 2018 when the WSP traffic surveys were undertaken) and forecast changes in households and jobs across Horsham District from NTEM (this may result in a figure lower than 17% but higher than 5%).</i> 8. <i>Therefore, the Capacity Assessment does not constitute a cumulative assessment, which looks at the combined impacts on the junctions considered from committed development.</i> 9. <i>A negative impact is indicated at the A24/A272 Buck Barn junction. This is a key junction in the County road network between strategic routes which is of economic importance.</i> 10. <i>If the Strategic Transport Assessment for the Neighbourhood Plan identifies an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe (NPPF 2019 Para 109), suitable and deliverable and cost-effective mitigation needs to be proposed. As required by paragraph 108 of the NPPF Sustainable transport measures should be identified and required to be delivered along with necessary highway mitigation through the allocation policy.</i> 11. <i>The TA does not consider sustainable travel modes including whether and what improvements for public transport, cycling and walking would be necessary to conform to or better the suggested vehicular trip generation, which will be based on sites with sustainable travel plans in place.</i> 12. <i>Until further Transport Assessment work is completed to an agreed methodology, to identify the impacts and mitigation measures in West Sussex from the proposed allocation, West Sussex County Council consider the Plan does</i>

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		<p><i>not meet the basic conditions and is contrary to NPPF (Para 109). We would welcome further consideration and discussion with the Parish and District Councils on ways to resolve this issue.</i></p> <p>13. <i>On the matter of Education, the respondent repeats their comments made at Regulation 14 consultation ‘the need for school places, and where necessary, the delivery of new schools, should take into account the cumulative development of an area’.</i></p> <p>14. <i>The allocation of dwellings proposed in the plan would not require a new secondary school.</i></p> <p>15. <i>The County Council supports the safeguarding of land for education, However, at this time no commitment could be given without the completion of the HDPF Review and cumulative assessment of educational need that takes into consideration future housing allocations and pupil projections.</i></p> <p>16. <i>Further information is sought ‘to ensure it is of an adequate size and there would be no obstacles or obstructions that would prevent a future school being delivered’. It is also suggested that the plan makes reference ‘to the need to provide sufficient provision for early years, primary school, special school or youth facilities to mitigate the development. The proposed allocation would require the developer to provide for 24 early years places’.</i></p> <p>17. <i>The amendments made to SNP2 with regards to the Grade II* Great House Farm Listed Building. The respondent adds that the following constraints need to be taken into account, ‘For much of the site seasonal ground water levels reach between 0.025m and 0.5m of the surface, and within 0.025m in the west of the site’.</i></p> <p>18. <i>SNP2.2(c) - There is no details given as how the aims to improve or upgrade walking and cycling to Christ’s Hospital railway station as well the Downs Link has no detail as to how this could be achieved or by whom.</i></p> <p>19. <i>SNP4.3 – ‘Justification would need to be provided within the applicant’s Transport Assessment as to whether the site would have a negative impact on the road network or highway safety, in accordance with NPPF Para 109. Any traffic calming would need to take into account adopted WSCC Policy in this regard’.</i></p> <p>20. <i>‘the County Council requests that the policy specifically refers to West Sussex County Council’s Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator. The standards are currently being updated and will include a requirement for EV charging points’.</i></p> <p>21. <i>Paragraph 7.21 SNP14.2 – it is considered that the wording is not in line with the NPPF. The following amendment is suggested: ‘Where this criteria is not met applications should be refused further justification should be provided by the applicant.’</i></p> <p>22. <i>Paragraph 7.21 SNP14.3 - it is considered that the wording is not in line with the NPPF. The following amendment is suggested: ‘Where a proposed development would result in the loss of a garage, the application will be refused unless the applicant should provide an evidence of alternative parking elsewhere within the curtilage of the dwelling.’</i></p> <p>23. <i>SNP15.1 – policy is supported.</i></p>

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		<p>24. SNP22.1 – <i>The following suggestion is made - ‘Proposals for the provision of telecommunication infrastructure will be approved supported where they do not have an unacceptable impact on residential amenity’</i></p> <p>25. SNP22.2 - <i>The amendments made to this policy is supported.</i></p> <p>Please note: Respondent made partial withdrawal of representation, the objection on Transport, on 16 October 2019 following further work which had been undertaken between the respondent and the promoters of the site regarding the Highway Capacity Assessment for the proposed housing allocation.</p>
Ref #29	Support	<ol style="list-style-type: none"> 1. <i>‘Supports proposed designations of Denne Park, the Horsham golf and fitness golf course and Horsham football ground’</i> <ol style="list-style-type: none"> i. <i>Document 14 Open space assessment - assessment inset 2 NE Southwater (map) and Conclusion recommendation 2, ref 4 - designating formal/informal sports area</i> ii. <i>Document 17 - Landscape sensitivity and capacity - LCA Assessments 2b and 2c</i> iii. <i>Document 13 - review of heritage assets - reference map/assessment 11</i> 2. <i>‘However we would like to see text/clauses to ensure a balance of formal and informal sporting uses of this land can be maintained in future, and a clause to present its future use in the event that the golf course becomes commercially non viable, or similarly the Horsham football ground becomes non viable’.</i> 3. <i>‘In this event; the land should revert to open green space for agricultural, equestrian or informal recreation’.</i>
Ref #30	Paragraph 4.1 Have comments	<ol style="list-style-type: none"> 1. The respondent strongly opposes the proposal for development on sites 4F and 4m, of which the responded was not informed of, stating they were assured the previous month of making their representation that <i>‘assured there was nothing being proposed at this stage’</i>. 2. Respondent argues it will cause noise and air pollution, disturbance to life, with concerns to the health of their children. 3. The village would change from a small village into a ‘more of a busy town’ with impacts on farming and agriculture. 4. Argues that due to recent developments ‘schools, dentists and doctors are all over subscribed’. 5. Suggested modification: No more development in Southwater.
Ref #31 Wates	Sustainability Appraisal and Policy SNP2	<ol style="list-style-type: none"> 1. Wates Development is making the representation for land west of Worthing Road, Tower Hill (Site 15). The site also comes forward with sites 1 & 7, in the appendix is details in <i>‘how development of the wider area could come forward, complementing one another and delivering a range of different uses that would bring further benefits to the</i>

Reference	Policy No. Paragraph	Summary
		<p><i>community of Southwater and Tower Hill</i>'. The summaries were made by the respondent at the end of their representation.</p> <ol style="list-style-type: none"> 2. 'Our main concern surrounds the fact that the NP has been submitted to HDC after the transitional arrangements which means that it should be assessed against the current NPPF. This includes the standard methodology for assessing housing need which will increase housing targets in Horsham. The NP does not acknowledge or plan positively for this increasing housing need. This means that the NP does not meet basic condition (a) as it fails to take account of national policies and advice fails to contribute to sustainable development'. 3. 'We also have concerns with the approach the Parish have taken to the site selection process of the NP as the scale of development proposed at the single allocation should be considered a strategic development, beyond the scope of a Neighbourhood Plan. Furthermore, landscape analysis considers that the extent of the allocation should be limited to the eastern, less sensitive portion of the site. This means that alternative sites need to be considered to meet the remaining housing need'. 4. 'We consider that the Sustainability Appraisal cannot be considered robust and therefore there are doubts that the NP would contribute towards the achievement of sustainable development, contrary to the basic conditions'. 5. 'In light of the issues above, and for the NP to be consistent with the basic conditions, we would make the following recommendations': <ol style="list-style-type: none"> i. 'Policy SNP2 should be seeking to meet the level of housing need identified through the Government's standard methodology (1,082 new homes) or as an minimum commit, within policy, to an early review within 2 years;' ii. 'It is necessary for the proposed housing allocations to be reviewed and that a number of sites, which fall below the threshold of a strategic site, be allocated to meet the housing requirements of the Parish;' iii. 'The supporting Sustainability Appraisal should be reviewed with the scope of Option 3 being reconsidered in order to provide a more fair and balanced view of the implications of this spatial option with the outcomes of the individual site assessments being based upon more robust findings.' 6. Attached to the representation is: <ol style="list-style-type: none"> i. Appendix One – Vision Document ii. Appendix Two – Reg 14 Representations iii. Appendix Three – Heritage Appraisal iv. Appendix Four – Landscape and Visual Appraisal v. Appendix Five – Highways Note

Reference	Policy No. Paragraph	Summary
Ref #32	Oppose Paragraph 4.11 Page 50 of Site Assessment - 4f and 4m (site ref. SA119)	<ol style="list-style-type: none"> 1. The respondent opposes the proposed allocation made in the plan on the grounds of negative impact on Ancient Woodland, Local farming and agriculture. 2. Raises concerns about the impact on house prices of existing dwellings adjacent and the light they currently receive. 3. Impacts on local services and schools are raised, dentist and insufficient capacity at primary and secondary schools. 4. 'Southwater will lose its village feel'. 5. The respondent wishes to make an official complaint about how the neighbourhood plan was advertised, being it as insufficient. With the proposed site being directly adjacent to their garden, the respondent feels they should have been notified and only found out about it from a neighbour.
Ref #33	Support with Modifications SNP7	<ol style="list-style-type: none"> 1. Supports designation of Horsham Golf Club as a formal/informal sports area, protection of Open Spaces, improvements to 'non-motorised routes' through the Golf course, core principles and designation of Denne Parkland as a Heritage Asset (page 33). 2. The respondent would like to see text/clauses which maintains the use of the land in future and <i>'a clause to present its future use in the event that the golf course becomes commercially non viable, or similarly the Horsham football ground becomes non viable. In this event; the land should revert to open green space for agricultural, equestrian or informal recreation'</i>. 3. <i>'to prevent against coalescence, and development on the site such as clubhouse buildings, artificial surfaces, parking, seating/stands, more floodlights, Tannoys and increased opening hours - all of which would further deplete the existing amenity of the Denne Park area and neighbouring residences'</i>.
Ref #34	Support SHLAA: SA754, SNP1.1.g, SNP 13.4, SNP1.3 and SNP7.1.a	<ol style="list-style-type: none"> 1. Supports designation of Horsham Golf Club as a formal/informal sports area. 2. Development on this site would lead to detriment to landscape, routes promoted in Neighbourhood Plan Policies Map (SNP 13.4) and urbanisation of an rural area contributing to coalescence between Horsham Southwater seeing <i>'one urban sprawl which is contrary to Southwater's policy and Horsham District's policies'</i>. 3. <i>Following suggested modification is made 'Maintain and continue to improve the existing 18-hole golf course with a new club house, as previously proposed. This does not preclude adding additional sport facilities but should not include housings'</i>.
Ref #35	Oppose SNP7	<ol style="list-style-type: none"> 1. The respondent opposes proposed development on the Golf Course (NOTE: this unrelated to the plan – it is proposed to be designated as a formal/informal sports area).

Reference	Policy No. Paragraph	Summary
Ref #36 LRM Planning	SNP2 Oppose Consultation Material, SEA/SA, Housing Need, Evidence base	<ol style="list-style-type: none"> 1. <i>The respondent argues that the first early stages of consultation included their site however this work has been dismissed and another strategy adopted. The respondent State that they 'contest the justification for adopting a different strategy as outlined in para. 3.39 of the Consultation Statement, particularly as the SNP's evidence base is significantly flawed'.</i> 2. <i>The respondent notes that original site assessment work has not been included in the supporting documentation the exclusion of which is not in line the open and transparent process required by national planning guidance. The Council notes the respondents potential position on this.</i> 3. <i>Concerns are raised on the choice of sites for option 3 in the sustainability appraisal and feels that to assess site 1 with sights 7 and 15 would have been a better grouping and site 1 would have performed better.</i> 4. <i>'the sites identified originally for allocation in the Parish Council's Pre-Regulation 14 consultation were also not considered for assessment as a reasonable alternative. Given their original status, this is surprising'.</i> 5. <i>The respondent argues that the neighbourhood plan's site allocation is strategic in nature, given the definition of strategic sites in the Horsham District Planning Framework glossary and therefore the allocation is beyond the scope of the neighbourhood plan. On this basis the neighbourhood plan is in conflict with national planning policy and guidance and the local plan.</i> 6. <i>As a result of this, the respondent argues, the plan will now need to allocate a number of smaller sites.</i> 7. <i>In assessing the neighbourhood plans housing needs assessment, the respondent makes the following argument 'It is the standard method's methodology that the Government have considered most closely aligns with their objective of significantly boosting housing land supply. Any other alternative approach, particularly one which results in a significantly lower housing need figure, such as the SNP's Housing Needs Assessment, would be out of step with the Government's objectives concerning housing needs'.</i> 8. <i>'Accordingly, once completions since 2011 have been taken into account, the housing need figure for the Parish is around 1,000 dwellings up to 2031. The SNP should plan for this level of growth. Any alternative approach would not satisfy basic conditions a) and d)'.</i> 9. <i>Given that the HDPF review will see the use of the standard methodology by Horsham District Council whilst Southwater has not, there will be a conflict between the two documents, Of which will be ruled in favour of the HDPF what's the latest development plan document. To avoid such conflict Southwater neighbourhood plan should adopt the housing need based on the standard method.</i> 10. <i>'Consideration should be given to allocating an additional site in order to provide the necessary flexibility'.</i> 11. <i>The respondent makes this following suggestion the parish council will consider allocating a reserve side for additional flexibility to insure the plan it's not out of date by the emerging local plan review.</i>

Reference	Policy No. Paragraph	Summary
		<p>12. <i>'At para. 1.12 of the Regulation 16 SNP the Parish Council acknowledge that it may need to undertake a review of it on adoption of the Horsham District Planning Framework Review. However, this is only outlined in supporting text and not planning policy. A more definitive commitment to the need to potentially review the SNP should be provided in policy'.</i></p> <p>13. The respondent concludes with the following argument: <i>'For the reasons outlined in this representation, the site assessment process is flawed and has resulted in a lower score for Site 1 than could reasonably be expected. The Steering Group's work needs to be reassessed in light of the information presented in this representation and the accompanying Development Framework Documents'.</i></p> <p>14. The representation has attached the following:</p> <ul style="list-style-type: none"> i. Correspondence between the respondent and Neighbourhood Plan 12 November 2018 ii. Correspondence between the respondent and Neighbourhood Plan dated 31 December 2018 iii. Assessment of Option 1 and Revised Option 3, to include Sites 7 and 15 iv. Review of Southwater Landscape Sensitivity & Capacity Study in relation to development proposals at Tower Hill, Horsham Land at Tower Hill, Horsham May 2015 Land at Tower Hill, Horsham
Ref #37	Support SNP1, SNP2, SNP4, SNP5, SNP7, SNP13, SNP19	<ol style="list-style-type: none"> 1. Respondent supports the Core Principles – that Southwater remains a single centre settlement around Linot Square and priority be given to development within the BUAB and development outside the BUAB should be in accordance with the development plan. 2. Supports SNP2 allocation <i>'for the reasons identified within SNP2.2'</i> 3. Supports SNP4, development must demonstrate it can does not have severe impact on highway network and mitigate appropriately. 4. Supports SNP5 – Local Green Spaces 5. <i>'We support the designation of Horsham Recreational Area as a formal/informal sports area and the requirement that these sports areas are maintained for current and future generations'.</i> 6. <i>'We support the development and protection of non-motorised routes. A footpath and bridleway run through Horsham golf course'.</i> 7. Supports Heritage Asset designation of Denne Parkland.

Reference	Policy No. Paragraph	Summary
Ref #38 Berkeley Homes	Support Have Comments SNP1, SNP2, SNP3, Oppose SNP9, SNP14, SNP18, SNP18 Policies Map	<ol style="list-style-type: none"> 1. The Respondent represents a parcel of land allocated in the Neighbourhood Plan under Policy SNP2. 2. Supports Policy SNP1 <i>‘However, this policy does not make land beyond this area inherently unsustainable or unsuitable for development, particularly having regard to the likely future development needs in Horsham District to be established through the new Local Plan and the ability to provide new infrastructure to support sustainable patterns of development’.</i> 3. Supports the identification in the land west of Southwater and the housing need of 422 - 450 but recommends that 422 be treated as a minimum whilst 450 is not treated as a ‘cap’ in paragraph 4.12 to help provide flexibility. 4. The respondent makes the suggested modification that a small parcel of between the Broadacres development and the proposed allocation be added to the allocation. 5. Objection is made to ‘a minimum of 8 hectares of public open space’ SNHP2.1 as unjustified, with there being no requirement in open space standards and open space via a buffer to Listed Building Great House Farm yet to be fully determined by a heritage impact assessment. The following suggested modification is made to the last sentence in SNP 2.1: <ol style="list-style-type: none"> i. <i>“The site shall provide a minimum of approximately 8 hectares of public open space.”</i> 6. The wording at the beginning of Policy SP2.2 is deemed to be overly ‘prescriptive’. The following suggested modification is made: <ol style="list-style-type: none"> i. <i>‘Development proposals on this site must should meet the following criteria to be considered acceptable:’</i> 7. The respondent states that they are willing to develop the adjacent sites under their control which is north of the allocated site as part of the HDC Local Plan Review and hope that the allocated land could be represent the first phase of a larger strategic development. To ensure the plan does ‘not prejudice comprehensive long term development the following is suggested to be added to Policy SNP2.2: <ol style="list-style-type: none"> i. <i>1) New development should not prejudice potential comprehensive longer term development.</i> 8. The respondent supports land being safeguarded for secondary school or all-through school in Policy SNP3 <i>“However, paragraph 4.22 of the Neighbourhood Plan implies that a school may need to be delivered in connection with the growth set out in the Neighbourhood Plan. Berkeley considers that the need for a secondary (or all-through school) is a strategic matter, which should be considered through the District Council’s emerging Local Plan process in due course. This is acknowledged at paragraph 4.23 of the Neighbourhood Plan”.</i> 9. The respondent notes that <i>‘Policy SNP9 mandates the use of part M4(2) of the Building Regulations’</i> which as also noted being an optional part of building regulations not a requirement in the HDPF. The following suggested modifications are made:

Reference	Policy No. Paragraph	Summary
		<ul style="list-style-type: none"> i. <i>'SNP9.1. To ensure provide homes that are fit for all ages, all developers will be encouraged to deliver new dwellings (regardless of size, type or tenure) that achieve M4(2)* of the optional requirements in the Building Regulations'.</i> ii. <i>'SNP9.2. Where an extension is proposed, that new part of the dwelling should so far as reasonably possible conform to M4(2)* of the optional requirements in the Building Regulations'.</i> iii. <i>'SNP9.3. These requirements measures will be secured by condition on any permission granted'.</i> <p>10. <i>'supports the need for new development to make adequate provision for car parking and for the car parking to be well-designed. However, the policy requirements of Policy SNP14 appear to be overly detailed and prescriptive as to the way in which parking requirements should be met'. The respondent furthers argues that there is no flexibility allowed.</i></p> <p>11. <i>The respondent opposes 'the requirement set out in policy SNP18.3 to provide one tree per 40 sq m of floorspace created'. Whilst the respondent finds this to be 'laudable', they find it to be 'too prescriptive'. The respondent suggests 'a more general requirement for new development to retain and where appropriate provide additional tree planting as part of an agreed landscape strategy' whilst being committed to providing a 'net gain in biodiversity'.</i></p> <p>12. <i>Makes suggested modification to the policies map to include land suggested to be added in Policy SNP2.</i></p>
Ref #39	Oppose General	<ol style="list-style-type: none"> 1. The respondent feels that the plan fails to address poor transport infrastructure and lack of quality employment. 2. Respondent does not agree with quantum of social housing, as the village has already taken enough. 3. Respondent argues that there has been adverse impact on community services such as GPs, Schools, hospitals, roads and other forms of infrastructure. Respondent also feels that the 4G and broadband coverage is insufficient. 4. "There is plenty of space to build new roads, schools, stations and so on." 5. "The 98-bus service to Horsham is appallingly slow and drags around back roads. It takes an absurd 30 mins to reach the train station (from my nearest stop)". 6. Quotes The 1991 Southwater planning strategy 'General principles of development' section 2.4 which stated 'No additional development to the south-east, south or west of Southwater'.
Ref #40	Oppose SNP1, SNP2, SNP21 Paragraphs: 1.9,, 3.2, 4.1 –	<ol style="list-style-type: none"> 1. The representation is made in 5 parts. 2. Part 1: the Neighbourhood Plan does not meet the 'basic conditions' as it does not have regard to national planning policies and Planning Practice Guidance. The NPPF 2019 glossary states that Local Planning Authorities are described as strategic policy-making authorities which includes site allocations and envisages that neighbourhood plans do not make strategic allocations. The NPPF also states that plan makers should attempt to allocate 10%of sites through small and medium sites no larger than 1 hectare for housing (paragraph 69).

Reference	Policy No. Paragraph	Summary
	4.16, 5.1 – 5.6, 9	<ol style="list-style-type: none"> 3. Respondent argues that the plan is not in general conformity with paragraph 6 of the NPPF 2019 and PPG guidance – <i>‘the case of Southwater, such assets and areas would clearly comprise the Grade II* Listed Great House Farmhouse and the Courtland Wood SCNI/LWS, which otherwise stand to be negatively impacted by Policy SNP2’</i>. The respondent also argues that this sees confliction with paragraph 174 (a) of the NPPF 2019 to safeguard local bio-diversity and habitat management. Unless the development which cause significant harm must prove itself to be ‘wholly exceptional’ as stipulated in paragraph 194. 4. The plan does not contribute to sustainable development as it does not meet the environmental part of the UN definition as stated in Paragraph 7 footnote 4 NPPF2019. 5. The neighbourhood plan is in confliction with the HDPF as the allocation is strategic in nature which the plan state is not the case in the basic conditions statement without explanation. 6. The following suggestions are made: <i>‘site identified in Plan Policy SNP2 should be reduced in order to bring it below the threshold for a Strategic Site Allocation under the HDPF, and also to reduce the negative impact of additional new housing on both the ecology of Courtland Wood and the setting of Great House Farmhouse; it is submitted that this reduction could be achieved by making use of smaller sites within the existing settlement boundaries of Southwater and Christs Hospital, as indeed is stated to be a priority by the HDPF itself (# 4.8)’</i>. 7. Part 2: The respondent raises concerns that the plan’s core principle in policy SNP1.1 is designed to justify the allocation of housing being in one single site, this is questioned over the over-emphasise in the significance of the Lintot Square area in providing local residents with ‘shops, services and facilities’. with concerns over private car journeys. 8. The following suggestion is made. Paragraph 3.2 be re-written along with SNP1.1 so that sites away from Lintot could still fulfil the criteria of sustainable development. So that the plan is not undermined should site come forward as part of the Local Plan Review. 9. Part 3: Respondent notes Policy 15 of the HDPF, which stipulates that on top of Strategic allocations at least 1500 homes will be delivered through Neighbourhood Plans. The respondent questions why the plan accepted the minimum 422 figure in the AECOM HNA under grounds of being a second tier settlement in the HDPF, despite other second tier settlements (Storrington, Upper Beeding) accepting lower housing figures despite recent development (800 homes). The respondent notes the mentioned housing shortage in paragraph 4.1, which has no further details. 10. Respondent raises concerns that the plan will not address issues alluded to in 4.9 and impact mitigation of new development. 11. When looking at infrastructure in the SEA/SA concerns are raised that sewage-treatment facilities are not mentioned, given the current capacity struggling to cope.

Reference	Policy No. Paragraph	Summary
		<ol style="list-style-type: none"> 12. Questions delivery of requirement for road and Christs Hospital Railway Station improvements. 13. Respondent questions the plans conclusions on landscape impacts (SNP2.1) on allocated site. 14. The respondent doubts if SNP2 meets the requirements of NPPF 2019 paragraphs 194 and paragraph 174(a). 15. The following suggestion is made: a further Housing Needs Assessment <i>'in order to corroborate the findings of the first, not only in order to determine whether a different level of development would be feasible but also a different distribution (eg. to smaller sites within existing settlement boundaries)'</i>. 16. Part 4: <i>'Some of the local green and community spaces designated by Policies SNP5.1 and SNP6.1 should be re-considered in order to determine whether some at least could not be released for housing, specifically: Blakes Farm Field Bund, Larkspur Way Open Space, Charlock Way Open Space, Castlewood Road Bund, East of Easteds Lane, Corfe Close Open Space and Roman Lane/Turners Close Open Space.... the smaller sites among them could still be allocated for self-build housing (in line with NPPF para. 61)'</i> 17. Part 5: Th respondent questions why Southwater Business Park (which is not a Key Employment Area under the HDPF) has been designated as a 'Parish Employment Area' under Policy SNP21.1. The respondent makes the suggested modification that the site is instead allocated for residential housing, given that some businesses have left the site.
Ref #41 Historic England	Support General SNP2	<ol style="list-style-type: none"> 1. <i>'we have no matters to raise with regard to areas of interest to historic England. We are satisfied that the amendments to Policy SNP2 address the objections we raised at the pre-submission stage. We are pleased to support identification of Local Green Space at Policy SNP5 and non-designated heritage assets at Policy SNP19. Policy SNP16 establishes guidelines for the materiality and form of development that will support the conservation of local character and distinctiveness, whilst Policy SNP 18 in particular reflects the well-treed character of the present landscape'</i>.
Ref #42 Parker Dann	Oppose	<ol style="list-style-type: none"> 1. The representation is made on behalf of Site 12 which was not allocated in the Neighbourhood Plan. 2. The site has been the subject of a refused planning application (DC/17/2195) which appealed the decision and was dismissed, the respondent states that they will refer to the Inspector's report (Appeal Ref: APP/Z3825/W/18/3205099). 3. The respondent states that application was refused on grounds of being outside the built up area boundary but feels given paragraphs 9 and 17, 'this is an issue the Neighbourhood Plan can readily amended'. 4. <i>'We regret that our previous representations made at Regulation 14 stage have not been embraced; indeed they have been roundly ignored. There are some serious flaws in the Plan which need to be addressed'</i>. 5. The respondent feels the plan meets the requirements set out in the requirements under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990.

Reference	Policy No. Paragraph	Summary
		<p>6. The respondent argues that the plan does not meet the basic conditions as set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 following the Localism Act 2011. The respondent argues this on the grounds 'tailored' technical evidence base and inadequate local community engagement.</p> <p>7. Community Aspirations: The respondent argues that the Plan is 'poorly evidenced' with regards to the shared vision of local residents and them having little say on the shaping future development or where and how it should be allocated.</p> <p>8. The respondent argues that some sites were not consulted on in pre-regulation 14 development stage.</p> <p>9. <i>'At present the Neighbourhood Plan does not meet the basic conditions as it does not have regard to national policies, in particular paragraph 29 and 69 of the NPPF.'</i></p> <p>10. NOTE: The council notes that the respondent raises concern regarding a site in Appendix 20 and community engagement on this particular site.</p> <p>11. The respondent argues that community engagement should be undertaken again with a high level survey.</p> <p>12. <i>'If additional consultation is not required by the Examiner, we will seek to judicially review the Plan on the basis on apparent bias. The Plan needs to go back to Regulation 14 stage'.</i></p> <p>13. SNP2 – Allocation for Residential Development: The respondent argues that the plan has not made the effort to consider supplying 10% of housing need through small to medium sites as stipulated in paragraph 68a of the NPPF 2019 without a reason for not doing so.</p> <p>14. <i>'Paragraph 4.12 indicates that the amount of development for the site has had to be capped due to the presence of a number of constraints including a Listed Building, Ancient Woodland and a 6 Local Wildlife Site. These constraints are not present on other sites available to the Steering Group, notably Site 12'.</i></p> <p>15. The respondent disagrees with the plans conclusion in paragraph 4.16 that housing provision will be met wholly on greenfield land given Site has already been developed as confirmed by paragraph 17 of the appeal report.</p> <p>16. Site Assessments: <i>'The Site Assessment for Site 12 contains a number of errors which we would suggest are corrected, although we support the overall conclusion that the site scores 1'.</i></p> <p>17. The respondent argues that the site assessment does not note the site being brownfield and <i>'As such Dartford Borough Council v SSCLG [2016] EWHC 635 (Admin) is applicable'.</i> Respondent further states <i>'failure to identify sites that constitute previously developed land is a significant problem and shows a disregard for advice in national policy under paragraph 117 of the NPPF and Policy 2 which is a strategic policy relating to strategic development'.</i></p> <p>18. The plan does not meet the 'basic conditions' as it doesn't regard for national and local planning policies.</p>

Reference	Policy No. Paragraph	Summary
		<p>19. The respondent disagrees with the site assessment judging the site to have no landscape capacity, this was not deemed to be the case by both HDC and Inspector on DC/17/2195. The respondent argues that there is an inconsistency with the site assessment and the plan has assessed some sites with a 'light touch'.</p> <p>20. Sustainability Appraisal: <i>'we believe Site 12 actually appraises in a superior manner to those sites that are allocated if the assessment is carried out as set out below. We believe the errors with the Sustainability Appraisal should be corrected and Site 12 allocated for development'</i>.</p> <p>21. The respondent argues that the site should be scored better on objectives such as distances to services, landscape and job creation heritage.</p> <p>22. <i>'The assessment should be updated as we set out above and the allocation of residential development sites reconsidered'</i>.</p> <p>23. The respondent argues that other sites, such as site 19, has been scored unfairly against objective 5 and notes that the allocated site has not been appraised as a whole, with the sites make it (4d, 4F and 4M) appraised individually.</p> <p>24. The respondent makes the following comments on Option 2: <i>'The inclusion of Site 6 undermines the assessment. If this option is reconsidered with Sites 4I, 4M, 10 and 12 the option would appraise substantially better and avoid such a substantial incursion into open countryside'</i>. The respondent also proposes changes to Option 6 as well, which would include sites 12 and 19.</p> <p>25. Respondent does not agree with the conclusions made on Alteration 2 to the built up area boundary relates to Site 12 – The Copse, as they feel a larger portion of the site should be included in the BUAB. <i>Criteria A to C do not provide a reason for partial inclusion to the BUAB, it is also felt that Criterion D indicates that garden land should be included in the BUAB, in most instances. They argues that this backed up by criterion 2 'The boundary should whenever possible follow physical features (such as boundary fences)'</i>.</p> <p>26. The respondent argues that the plan's site allocation is not in general conformity with Policy 4 of the HDPF.</p> <p>27. Southwater Landscape Sensitivity & Capacity Assessment: <i>This conclusion is plainly wrong with Reference to the Council's SHLAA, the Neighbourhood Plan Steering Group's Site Assessment and most importantly the planning appeal decision associated with the site. This calls into question the validity of some of the other judgements made in the Assessment and its value as part of the evidence base.</i></p>
Ref #43	Support with modifications Paragraph 5.7 and 5.8	<ol style="list-style-type: none"> 1. The respondent supports Horsham Recreational Area as a formal/informal sports area. 2. The site acts as a buffer between Horsham and Southwater, with a proposed pedestrian bridge being poorly placed.

Reference	Policy No. Paragraph	Summary
	SNP7.1 (9)	
Ref #44 HDC	Support/ Comment	<p>Support is given to Southwater Neighbourhood Plan in meeting their Housing Requirement as identified through robust evidence. The allocation put forward in the plan reflects the settlement's status in the hierarchy and it is acknowledged the steering group and key stakeholders have worked closely with consultees to resolve key issues and this is commended.</p> <p>Proposed local green spaces must meet the tests as stipulated in the NPPF. This is a comprehensive criterion and the examiner should apply the tests robustly. It is state that HDC considers a BUAB review to be a strategic matter and a clear methodology is presented to ensure consistency across the district as such proposed minor amendments to the BUAB should be undertaken through the forthcoming Local Plan Review.</p>