

This is an extract from Horsham Trafalgar Neighbourhood Council's wider response to the Draft Horsham District Local Plan 2019-2036

Rookwood Objection from Horsham Trafalgar Neighbourhood Council

Horsham Trafalgar Neighbourhood Council strongly opposes the allocation of Land at Rookwood as a Strategic Site in the Local Plan. There are three key grounds for this objection:

1. Loss of amenity and local green space
2. Threat to the Warnham Local Nature Reserve
3. Increased risk of flooding to existing housing, both within the Trafalgar Neighbourhood and the Denne Neighbourhood

Loss of amenity and local green space

The Land at Rookwood is currently home to Rookwood Golf Course, which is a pay and play golf course. This means that it is more accessible to members of the general public, on a more flexible basis suiting a wider range of incomes, than many other golf clubs. Although it is argued that participation in golf is in decline in his country, such trends ebb and flow and it would be an expensive prospect to re-institute golf provision in future which is already present now. Furthermore, as other golf courses close there will be opportunities to attract displaced users.

In its current form, the land is not just used by golfers: It is connected to the Horsham Riverside Walk and is a popular destination on the West side of Horsham Town – the last such tract of green space – for walkers, with or without dogs. It is often referred to locally as a “green lung” for the Town and such spaces are very important for the health and wellbeing of local residents. In recent weeks the Neighbourhood Council has been contacted by many people extolling the virtues of this accessible open space, particularly during the COVID-19 emergency, accompanied by expressions of fear as to where they would have been without it or where they would be in the future

It is for reasons such as this that the provision of accessible services, facilities and open spaces to support the health, social and cultural wellbeing of communities is included as a key provision in the National Planning Policy Framework.

Furthermore, Spacial Objective 1 in the Draft Local Plan is to “Ensure that future development in the District is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and deliver thriving communities with a strong sense of place.”

In addition, Draft Strategic Policy 4 – Horsham Town states that:

“To promote the prosperity of Horsham town and maintain and strengthen its role as the primary economic and cultural centre in the District, and the wider economic area, development will be allowed within the built-up area of Horsham where it:

2. Contributes to the provision of a range of services and facilities, including those in arts, heritage and leisure that make the town self-sustaining.
6. Retains, enlarges or enhances the existing formal and informal green spaces within the town”

To build a large-scale housing development at Rookwood would both remove, rather than provide leisure facilities and destroy, rather than enlarge or enhance existing informal green space within the town.

Therefore, to take away such provision would not be in keeping with either National or Local planning policy.

Threat to Warnham Local Nature Reserve

The golf course and green space at Rookwood sits alongside, and in harmony with, Warnham Local Nature Reserve which lies within a Site of Special Scientific Significance. Within the Draft Local Plan, Policy 31 - Strategic Policy: Green Infrastructure and Biodiversity states that:

“6. Particular consideration will be given to the hierarchy of sites and habitats in the District as follows:

- a. Special Protection Area (SPA) and Special Areas of Conservation (SAC)
- b. Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNRs)
- c. Local Wildlife Sites (LWS), Local Nature Reserves (LNRs) and any areas of Ancient Woodland, traditional orchards, local geodiversity or other irreplaceable habitats not already identified in a & b above.

7. Where development is anticipated to have a direct or indirect adverse impact on sites or features of importance to nature conservation, development will be refused unless it can be demonstrated that:

- a. The objectives of a site’s designation, where applicable, and integrity of the area will not be undermined;
- b. The reason for the development clearly outweighs the need to protect the value of the site; and,
- c. That appropriate mitigation and compensation measures are provided.”

Threats to the Nature Reserve from any development at Rookwood, which have been identified by the Friends of Warnham Local Nature Reserve, include light pollution, noise pollution, landscape disorientation and window strikes, cat predation as well as flood risk. Given the nature and complexity of the site, it is inconceivable that the stipulations within the policy can be met, and any contention to the contrary lacks credibility.

Increased risk of flooding to existing housing, both within the Trafalgar Neighbourhood and the Denne Neighbourhood

The entire length of the boundary to the East side of the Land at Rookwood, as well as downstream to the south in Denne neighbourhood, sits in flood zones 2 and 3. Much of this land floods on a regular basis, and in the Winter of 2019/20 this flooding was significant (photos attached). Such flood events are likely to occur more regularly as a result of climate change, and the impact of extensive housing development upstream on the Land North of Horsham is not yet known.

Whilst the land proposed for housing at Rookwood may not itself be at high risk of flooding, building on this land is very likely to exacerbate flood risk to neighbouring established housing.

Draft Strategic Policy 40 – Flooding clearly states in 1.e. that “Development proposals will follow a sequential approach to flood risk management, where priority is given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. Development proposals will.....not result in a net loss of flood storage capacity and not adversely affect flood routing and thereby increase flood risk elsewhere.

It is therefore clear from the Council’s own Draft Local Plan that an extensive housing development at Rookwood would be inappropriate.

Other considerations

It is understood that local authorities are under an obligation to seek to make best use of land in their ownership. However, Draft Policy 30 - Strategic Policy: Protected Landscapes also states that:

“3. In the case of major development proposals in or adjoining protected areas, applicants will also be required to demonstrate why the proposal is in the public interest and what alternatives to the scheme have been considered.”

Warnham Local Nature Reserve and or the SSSI is an adjoining protected area. However, in the event that the Council is fully convinced that Rookwood Golf Course is not a viable venture going forward, it is far from clear that the proposal to build housing on the site is in the public interest or – more appropriately – what alternatives to the scheme have been considered.

Given the presence of the Nature Reserve nearby, HDC’s new “Wilder Horsham” partnership with the Sussex Wildlife Trust and the Council’s claims to be serious about improving biodiversity and combating climate change, it is unacceptable that the Council has not given serious considerations to alternatives such as tree planting and/or re-wilding part or all of the site and/or expansion of the Nature Reserve.

Such alternative schemes could deliver far greater biodiversity gain and carbon reduction than any housing scheme, could assist with flood risk mitigation. They would also not take away valuable local green space and infrastructure from residents – especially given the housing proposal would deliver a fraction of the District’s housing need at the price of such harm to the environment and the community.

For these reasons and others too numerous to mention, we believe the Land at Rookwood should not be progressed any further as a potential strategic site for development in the Local Plan.