

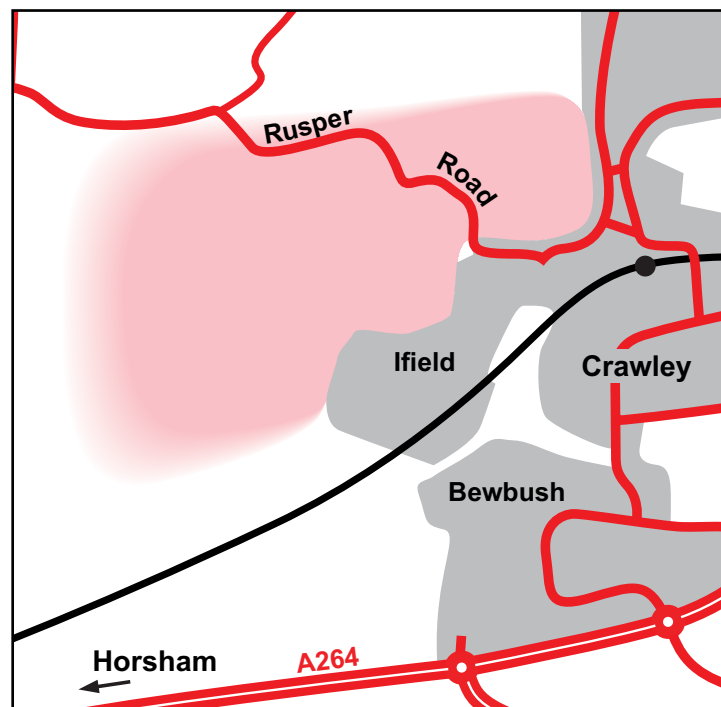


**HORSHAM DISTRICT
LOCAL DEVELOPMENT FRAMEWORK
TO 2026**

**Leading change in partnership to 2026 and beyond
Core Strategy Review Consultation Document**

**Key Delivery Stakeholder Position
Statement**

**Strategic Site Option 1:
West of Ifield**



September 2009



Potential Strategic Development Site Option 1: West of Ifield
Key Delivery Stakeholder Position Statement
Background Document to the Core Strategy Review Consultation Document

1 Key Delivery Stakeholder Position Statement

- 1.1 The Horsham District Core Strategy sets out a framework for planning the future of the District, including how the District Council intends to meet the Governments requirements for development. The existing Core Strategy covers the period to 2018, but the Council now needs to review the Core Strategy and look even further ahead in light of the South East Plan being approved.
- 1.2 The first stage of the review process is the consultation document 'Leading Change in Partnership to 2026 and Beyond', which sets out some of the key issues in planning the future of the District and options for how they can be addressed and how the Council's development requirements can be met. A number of potential strategic development sites are identified and this Key Stakeholder Position Statement Background Document sets out information on one of those sites.
- 1.3 This Key Stakeholder Position Statement Background Document has been prepared to inform the Core Strategy Review Consultation Document and to share the information the Council has received on the potential strategic development sites. The Position Statements are the outcome of the consultation work and discussions undertaken to date by the Council with key delivery stakeholders.
- 1.4 This Background Document forms part of the evidence base that informs the consultation on the Core Strategy Review Consultation Document 'Leading change in partnership to 2026 and beyond'.



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EDF

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
-	-	-	-

Having reviewed previous correspondence and representations to the Council by EDF, records indicate that EDF has not previously made comments on this general area. Dialogue between the Council and EDF is ongoing to establish the key issues relating to this aspect of the site.

Gatwick Airport Ltd

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
Submission Core Strategy	cssub2544	Tim Lockwood	16/12/05
CSR Position Statement		Tim Lockwood	17/04/09
CSR Position Statement		Amanda Purdye	15/04/09

Gatwick Airport Limited consider that any development site should exclude land falling within the indicative boundary for a twin runway airport (as published in GAL's interim master plan) and that new development should avoid areas exposed to daytime aircraft noise levels greater than 60 dBA Leq either associated with a continuing single runway operation or as would be attributable to operations on a second, wide spaced, runway.

This site is 3.5km South West from the Aerodrome Reference Point (ARP) of Gatwick Airport and lies beneath two of the Obstacle Limitation Surfaces (OLS) as detailed in CAA Publication CAP 168, Chapter Four. The most onerous being the Conical Surface which is a sloping surface rising at a gradient of 1:20 from 104.29m Above Ordnance Datum (AOD) to 131m AOD, any development will be restricted to those heights. The Conical Surface is indicated as orange lines on the attached plan.

The rest of the site is lies beneath the Inner Horizontal Surface (IHS) which is a flat surface located at 104.29m AOD, development in this area will be restricted to that height.

For a site in this location GAL would wish to be consulted on any proposed landscaping scheme and would not wish to see more than 5% berry/fruit bearing species which must be distributed throughout the planting palette so that pockets of exploitable habitat are not formed.

GAL would not wish to see any Oak or Scots Pine included in the planting palette as those species form broad canopies that are attractive to pigeons and corvids for nesting and roosting. Other tree planting should be at 4m centres to prevent continuous canopies from forming for the same reasons. Please see GAL's Advice Note 3 'Potential Bird Hazards from Amenity Landscaping & Building Design'.

GAL would wish to see any proposed SUDS if they contain large above ground water bodies and would wish them to be designed in such a manner so that they will not attract hazardous birds, please see GAL's Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage Schemes (SUDS)'.

Any flat/shallow pitched/green roofs on buildings over 500sqm could cause GAL concern and GAL would wish to see a Bird Management Plan(s) introduced to prevent gulls from utilising the roofs, see GAL's Advice Note 8 'Potential Bird Hazards from building Design'.

Cranes used in the construction of the proposed dwellings on this site would need a crane permit, please see GAL's Advice note 4 'Cranes & Other Construction Issues'.



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If any wind turbines are proposed for this site early consultation is required as turbines have the ability to impact on the safe operation of aircraft through interference with aviation radar. Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests. This is explained further in Advice Note 7 'Wind Turbines & Aviation'.

Highways Agency

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
WoB JAAP ADS	WoBAlt99-103	Peter Minshull	29/09/08
CSR Position Statement	-	Peter Minshull	30/04/09

The HA's main concern with the broad potential development sites put forward are the sites at West of Crawley and Faygate. We consider that it would not be appropriate to develop both sites given the potential material impact on the SRN. Therefore the HA recommends that only **one** of these sites is progressed. Individually these sites are likely to have a similar impact as a result of their locations and potential capacity of 2,000 – 3,000 dwellings. **We would wish to avoid the situation where the level of proposed development reaches the trigger point for a 'showstopper'.**

The HA is concerned about the risk of promoting this site in addition to the West of Bewbush development, which raises the issue of the cumulative impact of development on the SRN in combination with other potential development in and around Horsham and Crawley. There is a risk, particularly if both this site and land at Faygate were to proceed, of **reaching the trigger point for a 'showstopper'.**

The HA is concerned that there should be a significant level of sustainable travel provided with this development. While there is the potential to do this, there needs to be sufficient permeability with West of Bewbush together with existing developments, such as Ifield, Langley Green, Crawley town centre, Manor Royal etc. Would Fastway come through the development, if not, how would a link to Fastway be provided?

The HA recommends that green infrastructure (to include walking, cycling and public transport) should be improved as a result of this development coming forward. This will assist in the promotion of sustainable travel options.

The HA anticipates that the developer will contribute either wholly or in part in conjunction with other sources (where appropriate) towards the development of the scheme. Funding will be sought through section 106 agreements, section 278 agreements and the Community Infrastructure Levy (CIL). There should not be a reliance on developer funding alone for all transport improvements and therefore additional sources of funding should be identified.

Due to the current economic climate and uncertainty over the housing market, the HA expects that Horsham District Council (HDC) will fully investigate any funding sources and potential gaps due to present economic climate. Consideration should also be given as to the potential long terms impacts of this on the ability to deliver the housing and associated infrastructure as set out in the Core Strategy Review. The HA believes that it is also unlikely that the CIL will come into effect prior to autumn 2009. However consideration should still be given to this within the Core Strategy Review document as it will come in to force during the plan period. This should be confirmed in due course.

The HA has responded to a number of Local Development Framework (LDF) documents throughout the past 12 months in relation to the West of Bewbush site. Given its location in relation to the West of Crawley site, a number of the comments made in responding to these documents are also applicable



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Metrobus

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
CSR Position Statement	-	Nick Hill	05/04/09

We continue to strongly support the west of Crawley options, preferring west of Bewbush to west of Ifield. We believe that the location of these options would enable us to deliver high quality frequent bus services to Crawley town centre, Gatwick Airport and Manor Royal. There is the possibility that some, or all, of these services could be part of the Fastway network. We hope that these services would require a minimum of financial support compared with other new developments, allowing a greater investment to be made in transport infrastructure. The west of Bewbush option could probably also be served by buses en route to Horsham.

Network Rail

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
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Having reviewed previous correspondence and representations to the Council by Network Rail, records indicate that Network Rail has not previously made comments on this general area. Dialogue between the Council and Network Rail is ongoing to establish the key issues relating to this aspect of the site.

Scotia Gas

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
CSR Position Statement	-	David Munro	01/06/09

SGN advises that in general they can provide gas to any location that is required, be it through reinforcing an existing network or creating a new network by extending medium/intermediate pressure tiers. Urban Extensions would be able to link into existing supplies relatively easily, this would either require network reinforcement work or adding an additional governor to boost pressures/capacity. This would be the cheapest/quickest option.

Specific sites have to be assessed individually through SGN connections process to determine who bears the cost of reinforcement. Each project is analysed and costed on an individual basis, and each of them can have all sorts of different connotations (such as reinforcement, both chargeable and non-chargeable) that will be dependant on the scale and location of the project / site. Have a look at www.scotiagasnetworks.co.uk, in particular the sections of "Customer" and "Gas Connections". That should give more information of the types of services that SGN provide.

If the information is captured in the local plan or LDF, SGN can incorporate that into our strategic design. SGN can then plan reinforcements etc that are required so that if the sites do become live through the connections process SGN have a contingency in place to deal with any capacity issues.

Southern Water

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
Horsham Growth Study – Wastewater Assessment Summary Report	-	-	07/03/08
CSR Position Statement		Chris Kneale	07/04/09



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Southern Water only supplies water to this area. Major off site mains are available to serve the development and SWS will look to the developer to requisition a connection under Section 41 of the Water Industry Act (1991) to a point where adequate capacity exists as advised by Southern Water.

Thames Water

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
West of Bewbush JAAP Examination	Email	David Wilson	10/11/08
CSR Position Statement		Carmelle Bell	14/04/09

As set out in the previous Statement of Common Ground regarding the West of Crawley development, additional treatment capacity will be made available at Crawley STW during Thames Water's next funding period (AMP5 2010-2015) to provide capacity up to 2021 based on the housing requirements outlined in the Secretary of State's South East Plan Proposed Modifications, July 2008.

If the Crawley NE Development Area were to be included in addition to the West Development Area this would have the effect of speeding up the rate at which this spare capacity would be used. This would mean that the current design horizon of 2021 would be met in advance of this date.

Once the additional capacity has been used at the existing STW, it may require Thames Water to consider either relocating the existing works or constructing a new works in addition to Crawley STW. The time required to construct new or relocate works should not be underestimated - it can take 7-10 years plus.

Thames Water have not planned for any network upgrades to serve the NE Development Area but developers may be prepared to fund the necessary upgrades.

In relation to AMP5 and the Price Review, Ofwat will make an interim determination around August 2009 and a final determination around December 2009. Therefore there is not too much we can update you on at this stage and the 2008 Statement of Common Ground remains relevant.

WSCC

Education (Children and Young People's Services)

As stated above this site would swamp existing provision even if the current lack of take up of places at Thomas Bennet were to persist. We could look to expand provision at TB and Ifield but the practicality of doing this; both in terms of the site constraints, and the PFI contract would need careful evaluation. Some expansion in denominational provision may also be possible at Holy Trinity / St Wilfred's. The options taken would need to be assessed in the light of the complex demographics of Crawley where the 'artificial' creation of large blocks of similar age population that was associated with the creation of the new town often distorts

figures - (the 400+ surplus primary places in SW Crawley being a current example). The avoidance of providing places to meet an unsustainable bulge in demand being a paramount concern.

Regarding primary we did indicate in respect of the 1st phase of West of Crawley development a possible two primary strategy should substantial development occur north of the railway line. On that basis 5fe of primary might be needed to support the overall



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development either 3fe south of the line and 2fe north or visa versa.

A word of caution at present much of this is at best draft strategic approach and would need to be considered in the context of a wider Places Strategy and the necessary consultation with schools and our partners.

Library Service

At Crawley a new purpose build main library was opened in the latter part of 2008.

Wastes Management Services

The Crawley and Faygate locations are within the catchment of the Crawley HWRS. Anticipated development in other authority areas that this site serves are already, in aggregate, expected to put pressure on the Crawley HWRS. In these circumstances we would expect the need to improve our HWRS service provision in the area. This may mean establishing a new additional HWRS in the area. The precise solution however would be judged against the overall needs of the strategic HWRS network.

Highways and Transport

All of the following major development proposals would have to be subject to comprehensive Transport Assessments in accordance with national guidance provided by PPG13, the DfT/DCLG (March 2007) Guidelines for Transport Assessment and the West Sussex County Council Transport Methodology June 2007. Extensive transport modelling work or financial contributions to access existing transport models is also likely to be required.

Large peripheral site on the edge of the existing neighbourhoods of Ifield, Ifield West and Bewbush. No direct road links to the strategic road network – links only to the local road network. No immediate access to a mainline railway station with regular services – closest station is Ifield which is more of a halt and lacks frequent services. Fastway does not currently serve Ifield, but does serve Bewbush and is to be extended into the new development on Land West of Bewbush. Closest neighbourhood centre is Ifield which is well served by public transport, although demand exceeds capacity at certain times. Known traffic congestion on the A23 and A2220, especially during the peak hours. Extensive queuing takes place in Breezehurst Drive, Gossops Drive, Ifield Avenue, Tushmore roundabout, Martyrs Avenue and Manor Royal junctions. Evidence of accidents (especially serious) in Ifield and Bewbush. Problem of short-cutting traffic along rural roads (Rusper Road, Bonnets Lane etc) to avoid congestion. No bus priority, so buses have to queue with other traffic. A23 it is perceived as a barrier between the neighbourhoods on the west side of the A23 and the town centre.

- Provision of a new Western Relief Road (WRR) to serve the development from the strategic road network (A264 Crawley Road to A23 Lowfield Heath). Site has no links to the strategic road network and an increase in traffic through Ifield and Langley Green neighbourhoods would increase existing congestion at the existing A23 junctions leading to possible road safety and air quality issues. A WRR would take traffic off the A23 and, if properly designed, would deter short cutting along unsuitable rural roads.
- Opportunity for Park and Ride site served off the southern part of the WRR served by extension to Fastway.
- High quality public transport links to major transport interchanges, Crawley town centre, Ifield neighbourhood centre, Gatwick Airport and Manor Royal employment centres.
- New road links from Ifield and Ifield West to the WRR to relieve A23 junctions (Ifield Avenue, Gossops Drive and Martyrs Avenue). This would free up junction capacity and allow bus priority measures to be introduced across the A23 Ifield Avenue roundabout into the town centre. However, any links would have to be designed to deter short-cutting along unsuitable roads.
- Real-Time Passenger Information (RTPI) to be provided at bus stops and within each new dwelling to encourage public transport use.



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- Residential and commercial travel plans to emphasise transport choices and reduce dependence on the private car.
- A possible car club to reduce car ownership levels.
- Excellent cycle and footway links within the development and to enhance the links to existing cycle and pedestrian networks in the town (including the Horsham-Crawley cycle path)
- Investigate improved frequency of rail services at Ifield station with Network Rail and the service operator.

English Heritage

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
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Having reviewed previous correspondence and representations to the Council by English Heritage, records indicate that English Heritage have not previously made comments on this general area. Dialogue between the Council and English Heritage is ongoing to establish the key issues relating to this aspect of the site.

Environment Agency

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
-	-	-	-

A 'formal' Position Statement is being produced by the EA, but in the meantime they have provided us with the following information regarding the west of Ifield.

Flood risk

The majority of the site lies within Flood Zone 1. The rivers Mole; Hyde Hill Brook, Ifield Mill Stream and Ifield Brook (all main rivers) flow through the site and therefore portions of the site lie within the floodplain localised around these watercourses. This is largely undeveloped floodplain and therefore forms an important function of flood attenuation, reducing the flood risk downstream. These floodplains must be maintained. Development should be located outside this area.

Please be aware of the EA proposed flood storage reservoirs for a portion of this site. There may be room for limited development in the area not affected by this scheme.

Residential development on this site will need to consider the following points:

- If access to the site is provided over these watercourses they would need to be designed only where essential, to have minimum impact of the river and in such a way not to increase flood risk through impedance of flow, poor design. If a river crossing was the only access to the site consideration of safe access for residents out of the development in times of flood is necessary (please note these would require flood defence consents).
- No buildings within 8m of any main river.
- We hold no detailed modelling Hyde Hill Brook and we would recommend further detailed investigation/modelling to determine the flood extent in this area.
- The design of SuDS as previously mentioned.

Groundwater / Contaminated Land



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There are no principal (or major) aquifers or source protection zones in the area. The bedrock geology for the area comprises Weald Clay which means that the groundwater is not sensitive in the area.

There are shallow gravels/alluvial deposits to the North of the area associated with the River Mole and to the South/East of the area associated with the Ifield Brook. These are important in terms of groundwater protection.

Biodiversity

As stated in previous communications from Graham Piper, the land between the River Mole and the Ifield Brook, immediately above their confluence, is an area in which we are progressing plans for a major capital scheme. This area is proposed as a flood storage area and therefore would be unsuitable for development. The situation is still the same at the present time.

Apart from the specific area mentioned above, we have little ecological information on this potential development site. However, we would expect a minimum 8m undeveloped buffer zone either side of all main rivers such as the River Mole, the Ifield Brook and the Hyde Hill Brook and a minimum 5m undeveloped buffer zone either side of all non-main rivers and standing water bodies. However, a much wider buffer zone, especially to the main rivers, would be preferable, which could incorporate both undisturbed areas for wildlife closer to the rivers as well as informal recreation areas further back.

The potential development site does appear to encroach onto an area of Ancient Woodland to the south known as House Copse. This area of woodland should therefore be protected from any development, perhaps by means of an undisturbed buffer zone.

We recommend that as a minimum, a desktop study of the ecology of the area is undertaken, to establish important habitats and species, particularly protected species, that may be present. This can be done by asking the local records centre to carry out a search. A more informed decision as to the suitability for development of part or all of this site can then be made.

Natural England

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
Core Strategy Alternative Development Sites	adsbc14996	Michael Knight*	14/03/06
CSR Position Statement	-	Sue Beale	15/04/09

*This was submitted on behalf of English Nature, prior to the establishment of Natural England.

This site includes House Copse Site of Special Scientific Interest (SSSI). English Nature would object to any proposed development in this area which would adversely affect the features for which this SSSI was notified. The need to protect the interest features of this site

should be taken into account when undertaking the studies to identify the precise form and nature of any proposed development.

As stated in previous responses the potential development area includes House Copse SSSI and Natural England would object to any proposed development which would adversely affect the interest features for which the SSSI was notified.



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SE Coast Strategic Health Authority

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
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Having reviewed previous correspondence and representations to the Council by the SE Coast Strategic Health Authority, records indicate that the SE Coast Strategic Health Authority has not previously made comments on this general area. Dialogue between the Council and the SE Coast Strategic Health Authority is ongoing to establish the key issues relating to this aspect of the site.

Surrey & Sussex Healthcare NHS Trust

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
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Having reviewed previous correspondence and representations to the Council by SE Coast Strategic Health Authority, records indicate that SE Coast Strategic Health Authority has not previously made comments on this general area. Dialogue between the Council and SE Coast Strategic Health Authority is ongoing to establish the key issues relating to this aspect of the site.

Sussex Police

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
CSR Position Statement	-	CI Steve Biglands	01/06/09

The growth that is suggested is of sufficient magnitude for it to have an effect on the policing requirement of the District. In order to minimise this, can Sussex Police be involved at all states so that the potential impact can be mitigated and planned for.

WS PCT

Draft Position Statement – No response received as of 02/06/09

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
-	-	-	-

Having reviewed previous correspondence and representations to the Council by the WS PCT, records indicate that the WS PCT has not previously made comments on this general area. Dialogue between the Council and the WS PCT is ongoing to establish the key issues relating to this aspect of the site.