

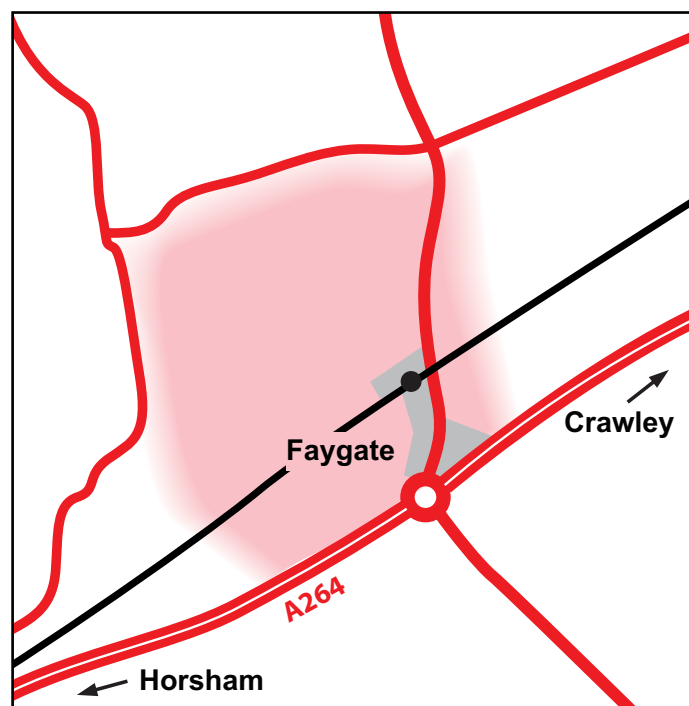


**HORSHAM DISTRICT  
LOCAL DEVELOPMENT FRAMEWORK  
TO 2026**

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

**Key Delivery Stakeholder Position  
Statement**

**Strategic Site Option 2:  
Faygate**



**September 2009**



**Appraisal of Potential Strategic Development Site Option 2: Land at Faygate  
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'.



## Appraisal of Potential Strategic Development Site Option 2: Land at Faygate Background Document to the Core Strategy Review Consultation Document

### EDF

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
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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
CSR Position Statement		Amanda Purdye	15/04/09

This site is 6.9km 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 which is a sloping surface rising at a gradient of 1:20 from 155.9m Above Ordnance Datum (AOD) to 209.29m 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 Outer Horizontal Surface (OHS) which is a flat surface located at 209.29m 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)' attached for your information.

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'.

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'.



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### Highways Agency

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
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 West of Crawley were to proceed, of **reaching the trigger point for a 'showstopper'.**

The HA is concerned that this development has the potential to be a dormitory for Horsham and Crawley. The development needs to be well planned with a balance of jobs and housing with the full range of services, such that there is a minimal need to out-commute.

Nevertheless, there is likely to be a need for some to travel to Horsham and Crawley. Currently the site is poorly served by public transport. While there is a rail station, very few trains stop there and the number could be significantly reduced if a new station is provided with the West of Bewbush development.

The HA would need to be satisfied that a significant level of sustainable travel can be and will be delivered as part of the development.

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 feel it would not be possible to promote the land at Faygate in addition to the West of Bewbush site or land West of Crawley due to the likely cumulative impact on M23 J11. Faygate has a similar development range to West of Crawley with the potential for 2,000 – 3,000 dwellings and so it would be reasonable to note that the broad conclusions made from the modelling assessment work on West of Crawley could be applicable to the Faygate site. As per the West of Crawley position statement, the HA would require the inclusion of a proportional contribution to junction improvements at Junction 11 of the M23, if the assessment shows a material impact.

Developments such as Faygate that are close to or have good links to motorway junctions have the greatest potential to generate traffic impacts on the SRN. Where these effects are likely to occur, either in isolation or in combination with other sites (as would be a high risk with this site), it is essential that the need for developers to consider and address these potential impacts is set out. Addressing the impacts could be through a combination of demand management and, as a last resort, infrastructure measures to relieve congestion and delay.

The HA believes that it is vital that development does not take place at a faster rate than the provision of any related infrastructure requirements as this could lead to unacceptable impact occurring on the SRN. It is recommended that the delivery of sustainable transport should be phased in line with development in order to mitigate potential impacts on the SRN. This would help ensure that the Strategy is in line with PPG13 paragraph 20 and would be in line with PPS12 Tests of Soundness.



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It is clear that there are many uncertainties regarding some of the future development in the area around Crawley Borough. The HA would be concerned that a further neighbourhood in addition to the West of Bewbush, such as the site at Faygate would cause an unacceptable impact on the A23 and M23. The HA would wish to be involved in consultation with regard to any infrastructure requirements should this additional development progress. However, due to the reasons previously given above the HA does not believe that Faygate in addition to the land West of Crawley could be progressed.

**Metrobus**

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

The land at Faygate would already be close to a fairly good bus service on the A264, even if enhancements were not made. A few years ago, the bus service to Faygate ran at best every 90 minutes on weekdays only. In recent years Metrobus have made improvements which now provide two buses an hour to Horsham, Roffey and Bewbush, and one bus an hour to Crawley town centre, Gossops Green, Ifield, Langley Green, Manor Royal, Gatwick Airport and North Heath on Mondays to Saturdays. Many of these places are now served by an hourly Sunday and Public Holiday service.

Faygate is well sited for good bus services as it is on the only direct road from Crawley to Horsham. It is likely that the new development would increase demand for such services and would help to enable us to increase provision. This assumes that it is deemed acceptable for residents to walk to the bus stop on the A264. If this is not the case, it is likely that financial support would be required for special buses to penetrate the new housing areas as it would not be possible to justify diverting existing through services.

**Network Rail**

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

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](http://www.scotiagasnetworks.co.uk), in particular the sections of "Customer" and "Gas Connections". That should give a bit more information of the types of services that SGN provide.



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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
General Meeting	-	Chris Kneale	14/04/08
CSR Position Statement		Chris Kneale	07/04/09

Southern Water supplies water and wastewater services to this area.

**Water** – there is no fundamental reason why this site would not be suitable for development. Major off site mains reinforcements will be required and the development may contribute to the need for additional resources. We 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.

**Sewerage** – there is no sewer capacity to accommodate the proposed development and the developer will need to requisition a connection to the nearest point of capacity, as specified by Southern Water.

Faygate WTW currently serves around 100 properties and has headroom within the existing discharge consent for up to 90 additional dwellings if the treatment capacity of the works is extended. Development at the level proposed would increase the volume of effluent discharged fifteen fold and consent for an increase of this magnitude is unlikely to be granted by the EA. HDC are advised to check with the EA whether they are likely to object to a significant increase in the volume of effluent discharged from Faygate WTW.

In theory, the development could drain to Horsham WTW if the developer funds the cost of a new sewer to connect the development directly to Horsham WTW. However there are potential environmental constraints relating to the Horsham WTW discharge that are described below that are likely to constrain this option.

### Thames Water

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
Local Plan: First Review	-	Georgie Cook	17/10/00

The boundary between Thames Water and Southern Water divides Faygate. The area east of Faygate Lane and north of Park Road are situated in the Thames Water region. Although Thames Water does not have any existing wastewater facilities in Faygate, we would be happy to discuss the provision of necessary infrastructure with developers.

### WSCC

#### Education (Children and Young People's Services)

Development of this site represents a major issue in the balance of places between Horsham and Crawley. Combined with the Land West of Crawley (2-3000 dwellings) could produce 6 forms of entry of demand. We could expect a degree of 'backwash' from the existing proposal west of Crawley into Horsham schools particularly Millais, but to some extent Tanbridge House and Forest as well. This development would swamp any Horsham provision and the need for a new secondary on the eastern edge of Horsham or west of Crawley may be the solution. The relocation and expansion of an existing Horsham school plus expansion of provision in existing western Crawley schools may be an alternative. All possible solutions do



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however result in a substantial number of new places being required.

In respect of primary school, the Faygate site would for sustainability reasons alone require a primary school site of up to 2 forms of entry.

### **Library Service**

As far as future library provision is concerned the general approach is that any new large scale community that has a distinctive community focus such as a community centre should have library provision as part of that community building rather than stand alone buildings. As regards further information on library provision it would be necessary to see the nature of the community and then plan accordingly.

### **Wastes Management Services**

The Crawley and Faygate locations are within the catchment of the Crawley Household Waste Recycling Site (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 located to the north of the A264. Site has direct links to the strategic road network. Faygate has a mainline station but this is more of a halt and services are infrequent. There is very little employment and few community facilities in the village. If not provided, this would result in high levels of out-commuting to with resultant concerns about traffic impact on Crawley and Horsham. This could justify the provision of the Crawley Western Relief Road (WRR) or at least a significant contribution in association with Land West of Ifield. In addition, road safety improvements would be required to the A264. Significant concerns about short-cutting traffic along unsuitable roads to avoid traffic congestion in Crawley (e.g. Faygate Lane, Lambs Green Road, Rusper Road, Bonnets Lane etc). Bus services into the village are infrequent and those regular services between Horsham and Crawley stop on the A264 resulting in passengers having to cross this busy road. There could be timetabling problems in diverting bus services. Faygate Lane is unsuitable to serve a development of this scale as it is narrow, of poor alignment and lacks adequate pedestrian/cycle facilities in places (especially over the railway bridge). A new junction onto the A264 with a new link road into the development would therefore be required (including a new railway crossing) with the existing Faygate Lane/A264 junction being closed. A bus/rail interchange at Faygate station should be investigated to pick up Horsham-Crawley through services as should increase in frequency of rail services from the station.

- Provision of, or a significant contribution towards, a new Crawley Western Relief Road (WRR) - A264 Crawley Road to A23 Lowfield Heath – to mitigate development traffic and deter short cutting along unsuitable rural roads.
- The provision of a new junction onto the A264 with a new link road and railway line crossing. Faygate Lane to be closed and diverted onto this new link road at its northern end.
- A new transport interchange at Faygate station should be investigated to accommodate existing through bus services, although there would be significant service implications.
- A new pedestrian/cycle bridge across the A264 to provide a safe route across the A264.



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- Real-Time Passenger Information (RTPI) to be provided at bus stops and within each new dwelling to encourage public transport use.
- 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 the following information regarding land around Faygate.

#### Flood Risk

Surface water drainage issues which would need to be addressed.

There may be capacity issues around the sewage treatment facility. This should be checked with the infrastructure provider.

#### Groundwater / Contaminated Land

There is a historic landfill located at TQ 21920 34447 (Rusper Road) which is known to have accepted inert wastes. The area centred on TQ 21603 34453 is a known area of contamination relating to the historic land uses which includes timber treatment, general industrial use and MoD. It is known that some landfilling occurred in relation to WWII use, where crashed planes were recovered to the site. We would promote development on the area for the investigation and remediation to be funded via the development.

We would encourage development to incorporate the areas of known contamination to ensure that the historic legacy is appropriately investigated and assessed and where necessary remediated. Contamination from these sites is likely to cause a deterioration of water quality (ground and surface waters); remediation would lead to overall improvement. We would seek that these "difficult" sites are incorporated into any development scheme. It is likely that this site has been identified through the Local Authority's Contaminated Land Strategy and therefore would be prioritised for inspection. If this site is taken up through development the assessment process would speed up and be funded by the development.

We would encourage the use of SUDS, but where they are employed they must not cause mobilisation of contaminants, therefore infiltration should not be through areas of contamination.



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### Water Resource / Quality

There is currently a small wastewater treatment works at Faygate on the opposite side of the railway from the proposed development, such a major development will require the works to be significantly enlarged and upgraded with a subsequent tightening of the consent conditions, and in all probability the foul water pipes crossing the railway will also need upgrading.

Under the draft River Basin Management Plan the waterbody is currently at Moderate status (the limiting factors are: moderate for the proposed phosphate and dissolved oxygen limits).

### Biodiversity

GIS screening of this area (phase one habitat mapping) suggests that much of it is arable land, broadleaved woodland or amenity grassland. As above these data are not always accurate and site survey would be beneficial to establish the value of these habitats. There appears to be significant areas of amenity grassland within the allocation and a comparable amount of land should be retained as green infrastructure to provide recreation, amenity and biodiversity for the local communities. This is in keeping with policy CC8 in the South East Plan.

From the GIS screening there are a number of watercourses within the site, which form important wildlife corridors. It is necessary to protect and enhance these to meet the local authorities' obligations with regard to Biodiversity Action Plan habitats under the Natural Environment and Rural Communities Act (2006). This is also in keeping with Horsham Core Strategy Policy CP1 as described above, NRM5 of the South East Plan and PPS 9. Protection of the watercourse is also necessary to ensure no deterioration of these water bodies under the Water Framework Directive.

There do not appear to be any protected species records on the GIS system. However given the habitats present it is more likely that surveys have not been carried out, rather than the species being absent. Therefore, it will be necessary to undertake protected species surveys to assess the impact of development.

### Opportunities

Within the allocation site, there appear to be opportunities to improve the river habitat including river restoration and enhancement as well as opportunities for wetland and pond creation to help meet national biodiversity targets and achieve targets set out in the Water Framework Directive. In addition given the current amenity grassland on site, there appears to be an opportunity to fully integrate green infrastructure into any development to provide a sustainable location.

The land at Faygate appears to offer opportunities to improve and enhance both biodiversity and green infrastructure within the constraints highlighted above. However, further surveys and understanding of the site is necessary to ensure development would not be detrimental.

We would expect a minimum 8m undeveloped buffer zone either side of all main rivers such 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.

### **Natural England**

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
CSR Position Statement	-	Sue Beale	15/04/09



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Kilwood Copse ancient woodland is adjacent to the potential development area and local authorities have a vital role in ensuring its conservation, in particular through the planning system. Local authorities have an obligation to protect ancient woodland from damage or loss by development particularly those under PPS9.

Natural England have recently issued standing advice on ancient woodland which aims to help local authorities meet their obligations and assist in the assessment of the possible effects of development, the advice can be found at: [http://www.naturalengland.org.uk/regions/south\\_east/ourwork/standingadvice/default.aspx](http://www.naturalengland.org.uk/regions/south_east/ourwork/standingadvice/default.aspx)

### 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
-	-	-	-

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.

### West Sussex Primary Care Trust (WS PCT)

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