

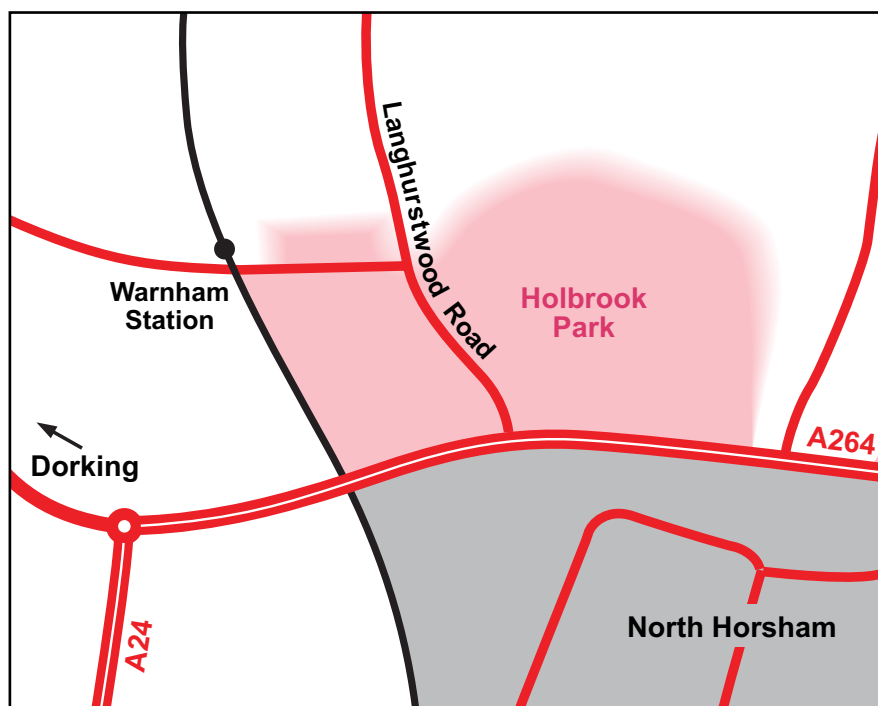


**HORSHAM DISTRICT  
LOCAL DEVELOPMENT FRAMEWORK  
TO 2026**

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

**Key Delivery Stakeholder Position  
Statement**

**Strategic Site Option 3:  
North Horsham Western Area - Holbrook Park**



**September 2009**



**Appraisal of Potential Strategic Development Site Option 3: North Horsham – Holbrook Park  
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**

<b>Consultation Stage</b>	<b>Respondent/Rep No.</b>	<b>Name of Respondent</b>	<b>Date</b>
-	-	-	-

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**

<b>Consultation Stage</b>	<b>Respondent/Rep No.</b>	<b>Name of Respondent</b>	<b>Date</b>
-	-	-	-

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

**Highways Agency**

<b>Consultation Stage</b>	<b>Respondent/Rep No.</b>	<b>Name of Respondent</b>	<b>Date</b>
CSR Position Statement	-	Peter Minshull	21/08/09

The HA is concerned about the risk of promoting this site in addition to the West of Bewbush development (which is the subject of its own DPD, the West of Bewbush Joint Area Action Plan). The HA considers that in terms of impact on the M23 Junction 11 only one site additional to West of Bewbush can be delivered in the Horsham Crawley, ie if two or more sites from West of Ifield, Faygate, Chennells Brook and Holbrook Park were to proceed there is a risk of reaching the trigger point for a 'showstopper'.

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. There is likely to be a need for some travel to the nearby settlements of Horsham and Crawley. While there is a rail station at Warnham, very few trains stop there.

The HA would need to be satisfied that a significant level of sustainable travel (to include walking, cycling and public transport) can and will be delivered as part of the development.

Approximate costs associated with any required works will be agreed at a later date (but well before the site could be included in the revised Core Strategy), when a definitive position regarding the exact development impacts and associated required works has been reached.

Precise timescales will be advised and agreed at a later date (but well before the site could be included in the revised Core Strategy) when a definitive position regarding any required works has been reached.

The HA would normally expect that developers will contribute in part and in conjunction with other sources (where appropriate) towards mitigation of any Strategic Road Network (SRN) impacts arising as a result of development. 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. The HA expects that all potential funding sources and gaps for additional infrastructure and facilities required in transport terms



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will be explored prior to any permission being granted for development. These should be detailed within the Core Strategy document and contributions towards funding should be agreed in line with the relevant policy documents.

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 that are due to present economic conditions. 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. As you are aware the introduction of CIL has been postponed to 2010. 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 believes that responsibility for delivery of the site and associated infrastructure will rest with HDC. The HA refers to the PINS 'Lessons Learnt Examining Development Plan Documents' (PINS, 2007), paragraph 1.2 which notes the following in terms of infrastructure requirements and deliverability: *"Infrastructure requirements resulting from the strategy should be identified as should the delivery mechanisms. The plan should say to the best of current knowledge how and when infrastructure will be delivered"*

It is therefore vital that deliverability from the transport perspective remains one of the key criteria used when giving further consideration to possible sites.

It would be reasonable to note that the broad conclusions made from the modelling assessment work on West of Crawley could be applicable to this site as well. Depending on the results of any specific assessment work or indeed any general junction or modelling work, the HA would require the inclusion of a proportional contribution to junction improvements at Junction 11 of the M23, if assessment shows a material impact on this junction.

Developments such as Holbrook Park that are relatively 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.

Due to the location of this site outside the by-pass, this could mean it is potentially less sustainable in transport terms, with the possibility of higher levels of car travel. Because of possible access to the A264, it could also have a greater impact on the SRN at M23 junction 11.

**Metrobus**

<b>Consultation Stage</b>	<b>Respondent/Rep No.</b>	<b>Name of Respondent</b>	<b>Date</b>
CSR Position Statement	-	Nick Hill	11/08/09

Both the North Horsham Eastern and Western areas are well sited to suit the extension and enhancement of existing services to the North Heath/Holbrook area. The additional demand created by the new development could enable existing services to be improved, which would



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benefit the existing parts of North Horsham served en route. The nature of the location means that any bus routes to and from the town centre would probably serve the station and possibly the hospital en route, further aiding transport links. The greatest scope for bus provision to these areas would be if both were built with a (possibly bus only) link between the two.

**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.

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	18/08/09

Southern Water supplies water and wastewater services to this area. No existing infrastructure crosses the proposed site.

**Water** – there is no fundamental reason why this site would not be suitable for development. Existing local distribution capacity cannot accommodate the size of development proposed and off site mains reinforcements would be required. The development may contribute to the need for additional resources. 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.



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**Sewerage** – existing local sewer capacity cannot accommodate the proposed development and the developer will need to requisition a connection to the nearest point of capacity, as specified by Southern Water.

**Wastewater treatment** – all sites would potentially drain to Horsham Wastewater Treatment Works (WTW). The Environment Agency is currently reviewing whether the existing consent for this works can be allowed to be retained in the light of environmental constraints in receiving water. The EA may therefore not permit the increased volume of effluent that would be discharged from Horsham WTW as a result of these developments. Environmental constraints could therefore limit development until an alternative discharge point is investigated and any necessary infrastructure is planned and constructed. Tripartite discussions between EA, HDC and SWS are recommended before these development options are progressed further.

**Thames Water**

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

This site is outside of the Thames Water catchment area.

**WSCC**

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

Children and Young People's Services (CYPS) work on a locality basis and the relevant localities are Horsham East and Horsham West and their forecasts predict that all schools in Horsham will be full with committed development at primary, secondary and sixth form. CYPS would also wish to seek contributions for early year's provision and youth services because of the large size of these possible development areas - we seek contributions at 500 units or above. The CYPS calculations below, which are summarised to begin with and then fleshed out in more detail, will need to be refined should the developments go ahead because the housing mix is an important factor which is unknown at present. CYPS have therefore, based the calculations on a 'rule of thumb' method that 1000 dwellings generate 1 form of entry (30 children) per year of age.

- 1.4 hectare site for a primary school.
- £9.6m contribution for schooling including sixth form and secondary.
- Further contribution/site for early years and youth to be determined.

**Library Service**

The library requirement is for space within a community building rather than a stand alone facility. This need will be modified in future as the Customer Service Centre model is rolled-out across the county. It is considered that given the proximity of these developments and the fact that we have already registered an interest in the Broadbridge Heath site; we would probably want to review the library provision in the Horsham area. Further, more detailed information on library provision would require more detailed information to be supplied.

**Minerals and Waste Policy**

At this early stage, there are a number of general comments:

**Minerals Safeguarding**



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Paragraph 13 of Mineral Planning Statement 1: Planning and Minerals states that; County Councils are required to define Mineral Safeguarding Areas (MSA) in order that proven resources are not needlessly sterilised by non-mineral development.

West Sussex County Council has commissioned a study to inform how the Council will determine its MSA and MCA as part of the Minerals and Waste Development Framework (MWDF). This study can be found on the County Council's website (<http://www.westsussex.gov.uk/ccm/content/your-council/plans-policies-reports-and-initiatives/mwdf/background-documents.en>). This study assesses the best geological resources within the county including local knowledge from the industry about the areas which might be economic in the future for mineral extraction.

The County Council will be defining its MSA and MCA as part of the emerging Minerals and Waste Core Strategy based on the evidence presented in the BGS study and information gathered by stakeholders. The MSA and MCA will eventually be shown on the key diagram in the adopted Minerals and Waste Core Strategy. District and Borough Councils are also obliged to show them on their LDF proposals map.

The potential strategic development areas fall within the brick clay and consolidated bedrock MSA, therefore the presence of these minerals should be taken into consideration. Due to the extent of the clay and sandstone resource, the County Council is likely to take a pragmatic approach to safeguarding, preferring to safeguard areas immediately around existing clay pits/quarries. With regard to the sites to the north of Horsham (3a-Holbrook park and 3b – Chennells Brook) these lie close to the existing Brickworks at Warnham and discussions with the operators suggest that they would wish to see the area immediately around the site safeguarded. Further information about the resource in these locations may therefore be required to determine whether the County Council would wish to object on mineral safeguarding grounds or whether prior extraction would be suitable.

### **Potential Waste Sites**

The County Council must plan to provide new waste management facilities to meet the capacity gap until 2026. Background Paper 6: Strategic Waste Sites provides the latest information on the capacity gap and what needs to be required over the plan period. The Minerals and Waste Policy Team are in the process of identifying sites for new waste development to meet the capacity shortfall until 2026. We anticipate that a list of potential waste sites within West Sussex will be publicly available in September.

It is important for the District to work jointly with the County to ensure that opportunities for new or extended waste sites are not lost and that existing sites are given careful consideration. Some types of waste management facilities can be accommodated on industrial areas (and generate employment) and this should be taken into account when reviewing employment land. Furthermore, the identification of potential development sites must consider the integration of waste management facilities to serve the development. Such waste uses could include the potential for energy derived from biomass waste and from thermal treatment and anaerobic digestion.

### **Existing Waste Sites**

The existing network of waste sites is also currently being examined by WSCC as part of the strategic waste site selection process. This will result in the safeguarding of a network of the most suitable waste sites as well as the identification of potential new sites. As there are many difficulties associated with established new waste facilities, it is essential that the stock of existing sites is protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation. It is also important to ensure that existing sites are not lost to other forms of development unless there are overriding reasons for their redevelopment (which should be discussed with WSCC). The most up to date list and map of



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existing waste sites is set out in the AMR (December 2008) which is available to download from the website ([www.westsussex.gov.uk/mwdf](http://www.westsussex.gov.uk/mwdf)).

This site lies in close proximity to the existing Brookhurst Wood site which is an existing non-inert landfill site. The site has also been selected to deliver the proposed Mechanical and Biological Treatment (MBT) plant as part of the Materials Resource Management Contract (MRMC). The proposed development should not prejudice the continued operation of the existing landfill site and any future waste uses on the site.

### **Waste Water Treatment**

The requirement for new or extended waste water treatment works is closely linked to new development proposals. Joint working is required between the Districts and statutory sewerage undertakers in order to identify likely future requirements and in particular, if new sites will need to be identified in the Minerals and Waste Core Strategy. Southern Water has identified that additional Waste Water Treatment Works (WWTW) capacity may be required to accommodate the additional growth in Horsham District.

### **Highways and Transport**

All of these 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 to the north of Horsham adjacent to the A264 Horsham northern by-pass. The A264 is part of the strategic road network and there is a direct frontage from the site to this road. It is envisaged that an adequate junction could be formed onto the A264 to serve the development. However, the impact on other junctions along the A264 and A24 would have to be established and, in particular, the impact on the approach junctions to Crawley.

The A264 northern by-pass is a major barrier between this site and the fairly new neighbourhood of North Horsham to the south. It is therefore essential that new cycle/pedestrian/equestrian links are provided across the A264 to connect the two neighbourhoods in the form of bridges. The Langhurstwood Road junction onto the A264 forms part of the site but is left in/left out only. This road currently serves a number of industrial/commercial uses and also a major waste management facility on the brickworks site. There are currently some serious traffic and environmental issues caused by these uses for residents in Langhurstwood Road, so the allocation of this site does provide an opportunity to investigate a new access road for industrial, commercial and waste traffic with a separate access for residential traffic. This would also allow the industrial and waste sites to be developed to their greater potential. There is a station at Warnham, but services are infrequent and it does not go to Crawley, the nearest major employment centre. Although it may be possible to improve the station and increase the number of services thereby making it attractive for some commuters, it is of much greater importance to improve Littlehaven station as this station is well used and has services calling at Crawley, Three Bridges and Gatwick. Littlehaven station though is more of a halt and has a number of deficiencies, including narrow platforms and high levels of on-street parking. The site is remote from Horsham station and bus station, so new bus services would also be required from the site into the North Horsham neighbourhood to the south using bus gateways.

The likely transport infrastructure requirements area:

- Provision of a new grade separated junction onto the A264 including the closure of the existing Langhurstwood Road junction.
- Capacity improvements to other junctions along the A264, A2220 and A24.



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- Provision of a new access road to Langhurstwood Road and the brickworks site to serve the existing industrial/commercial/waste uses. The residential site would have to be provided with a separate access (although both uses could be served off the same junction on the A264).
- New bridges across the A264 to provide safe links between the site and North Horsham neighbourhood.
- Improvements to Littlehaven and Warnham (?) stations with an increased level of train services.
- A bus gateway to be provided between the site and the North Horsham neighbourhood.
- Regular bus services to be provided between the site, Littlehaven station, Horsham station and the town centre, to include Real Time Passenger Information (RTPI) at bus stops and within new dwellings.
- 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.

**Suggested Supported Housing Provision**

WSCC Adults and Children Services have recently produced a 'Needs Analysis for Supported Housing in West Sussex'. The aim of this document is to help some of the most vulnerable members of our community lead fuller and more independent lives by ensuring suitable housing is available for them in which they can receive the support they need.

This Needs Analysis is intended to do two things. Firstly it predicts the numbers of customers who may be suitable for supported housing in West Sussex. Secondly, based on customer consultation and research, it tries to outline how customers would like the supported housing to be.

The Needs Analysis can then guide the County Council in its decisions about where and how to bring forward Supported Housing. The County Council is not a Housing Authority and has no obligation to house the majority of the population of West Sussex. However, it does have a statutory duty to support the most vulnerable members of our community. That statutory duty does mean we have to provide them with an appropriate setting in which they can receive that support. For the reasons set out above that setting is increasingly in supported housing rather than residential care.

The housing needs of the vulnerable people covered by this Needs Analysis should be taken into account when calculating the need for Affordable Housing in a District or Borough. Drawing on this work, WSCC Adults and Children Services wishes to continue to develop its relationship with the District in the planning of new supported housing for vulnerable people including older people, those with learning difficulties, people with physical and sensory impairments and other needs groups.

**Design preferences for people with physical disabilities**

The housing needs of people with physical disabilities are extremely varied. Clearly the type of housing required will vary with the nature of the person's disability and their physical and support needs. However, equally varied are the personal and family circumstances of people with disabilities and this is particularly true of those who acquired their disability later in life. Although many people rent their home, many own their property or would choose to do so if the right finance could be found.

Building homes to 'Lifetime Standards' will help to meet the needs of physically disabled people in the same way that it helps older people. However, Lifetime Homes Standards only guarantees access to the ground floor for wheelchair users and will not meet the needs of those in an electric wheelchair. There is therefore a higher standard of Lifetime Homes for wheelchair users. For example, the London Plan commits London Planning Authorities to building 10% of new housing to the wheelchair standard of Lifetime Homes.



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In terms of location, the aspiration should be to avoid significant “ghettos” of disabled people but to provide accommodation within the community. As with older people, the preference may well be for urban locations with good access to community facilities and services. A particular issue for physically disabled people can be car parking as they are often very dependent on their cars to get around. Dedicated parking close to their property is therefore desirable.

In terms of internal design the Lifetimes Homes Standards do provide a starting point. There are some common features that are usually necessary – e.g. large doorways, turning space for wheelchairs, level-access showers, level-access entry and door entry systems. However, each person will have differing needs depending on the nature of their disability. Some people do not have, and never will, the fine motor skills required to cook food. Therefore, a low-level fitted kitchen is of no use as it may actually cause injury to the person who undertakes these tasks on their behalf. Internal design should therefore focus on being as adaptable as possible at minimum cost. Occupational Therapists can provide advice on the adaptation of accommodation to meet the needs of a particular disabled person.

A successful partnership between the County Council and Horsham District Council will be crucial in order to identify need, make the best use of resources and commission the range and type of supported housing required by our customers. It is important that this partnership is maintained and in doing so the delivery of housing which will meet specialist needs are delivered.

Flowing from the recently produced West Sussex County Council, Adults and Children Needs, ‘Analysis for Supported Housing in West Sussex’ report document the following requirements relate to the understanding of facilities required in Horsham District area to 2026. Appropriate contributions towards these requirements would be sought from each proposed development.

- Number of extra care homes and extra care plus schemes needed for older people likely to be in need of Affordable Housing in 2026 – 6 (31 bedroom support homes);
- New homes needed for people with Physical Disabilities - 43 units;
- New homes needed for people with a learning disability – 86 units;
- New homes for people with mental illness – 34 units; and
- An anticipated number of countywide units are identified for Care Leavers and People with Substance misuse problems. Contributions would be sought towards such facilities in the urban area (specific unit provision for the area to be determined).

These homes will almost certainly be in the form of flatted accommodation. Bearing in mind the typical timescale over which the development will be developed, changes in local housing needs may need to be factored into the delivery of affordable housing in the later phases of the development.

Further work is being carried out to develop more specific commissioning intentions but hopefully this high level analysis will form an overall guide to long term requirement at present. This work is expected to be available by spring 2010.

### **Property Services**

Land to the north comprises the Biffa waste landfill site and Warnham brickworks. There is as you know a very difficult planning history to this area and the infrastructure to the landfill and other sites (including the business park on Langhurstwood road requires some extensive review of highways).

We would comment from a landowner perspective whether the site is truly linked to the Horsham as it was identified in the original HDCLDF Core Strategy that the A264 Northern bypass created a firm boundary to the town with lands to the north and east in the High Weald AONB.



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**English Heritage**

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

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
CSR Position Statement	-	Hannah Hyland	24/08/09

Water Quality

The proposed sites fall within the catchment of the main Horsham STW which discharges in to the River Arun.

The current consent has adequate headroom to accommodate the developments proposed in terms of flow, however, the consent is set currently at Best Available Technology (BAT) with regards to phosphorous removal. It is unknown as to how this will be impacted by the requirements of the Water Framework Directive (WFD).

Currently the river Arun fails for phosphorus both downstream and upstream of the works. The status under the Water Framework Directive is currently "Moderate". However, there is a requirement for all waterbodies to meet "good" ecological status by 2015.

Under the WFD development could proceed as long as the waterbody remains within the existing class (moderate status) and does not cause deterioration. It is likely that we will be requiring the Water Company to seek better than BAT limits at these works in their next Business Plan Period - PR14 (the period for improvements to be completed between 2015 and 2020).

Prior to fully understanding whether development in these locations would result in deterioration in the water body should be considered.

Through a programme of regional modelling of capacity at Waste Water Treatment Works we are commissioning investigative monitoring of the site to provide further evidence with regard to the impact of the discharge.

Surface Water Drainage

There are cumulative impacts on surface water drainage due to the number of developments in Horsham including the land south of Broadbridge Heath, the development to the east of the A24 and improvements to the A24. All surface water from development should be attenuating to Greenfield run-off rates but there are implications downstream with either more or less water getting into the River Arun at a different rate. These cumulative impacts should be considered through the Sustainability Appraisal. There are already known changes to the River Arun as a response to heavy rainfall downstream from Horsham.

Under PPS25, on all sites over 1 hectare, surface water is required to be addressed. Because all the sites are existing greenfield we would expect appropriate Sustainable Drainage Systems (SuDS) for the attenuation of surface water to be an integral part of any new development to ensure no increase in runoff or volume of surface water and therefore no



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increase in the risk of flooding. Where existing problems with flooding or surface water control exist, they should not add to the problems, but rather should seek to reduce and/or address any existing problems.

#### Water Framework Directive (WFD)

Within all three of the additional potential development sites, 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 WFD. Further details are provided below.

#### Green Infrastructure

Green infrastructure should be part and parcel of design at an early stage, and nearly all sites offer the potential for water harvesting and SuDS, these should be incorporated into any development proposal as well as swales and green roofs that attain large amounts of rainfall on a site. Green infrastructure should utilise spaces for recreation and biodiversity and enhance wildlife corridors to enable movement throughout the development site. Opportunities should be sought to encourage access to the countryside from Horsham and the development site via footpaths and cycle routes. These pathways can be buffered with trees, hedgerows and wet features using interpretation to engage communities with the local countryside.

#### Biodiversity

There are a number of watercourses within the sites which form important wildlife corridors. It is necessary to protect and enhance these to meet the local authorities' obligations with regard to BAP habitats under the Natural Environment and Rural Communities Act (2006). This is also in keeping with Horsham Core Strategy Policy CP1, NRM5 of the South East Plan and PPS9. Protection of the watercourse is also necessary to ensure no deterioration of these water bodies under the WFD.

Invasive plants such as Giant hogweed and Himalayan Balsam are rife throughout the Arun catchment; therefore any development in this area should highlight control strategies to combat the spread of these plants. Control and eradication of these species can improve natural riparian habitats and provide improved habitat for many important species.

Any deterioration or loss of habitats on site will need to be mitigated for. As well as incorporating mitigation strategies on site it is also possible to look at off site opportunities. These can be directed by UK Biodiversity Action Plan (UK BAP) and local conservation initiatives. In addition any development should highlight potential ecological enhancements above and beyond standard protection and mitigation measures for all impacts identified. In a development of this scale ecological enhancements should be an intrinsic part of the plans. This is in keeping with PPS1 – “Delivering Sustainable Development”, PPS9 – “Biodiversity and Geological Conservation” and the South East Plan. Policy NRM4 of the South East Plan seeks to avoid a net loss of biodiversity and to actively pursue opportunities to achieve a net gain of biodiversity across the region.

#### Flood Risk

According to our maps and records this site falls into flood zone 2 (land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year). Evidence of the Sequential Test should be provided in taking this site forward.



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Biodiversity

Within the allocated area there appear to be no records of protected species, this is probably due to a lack of survey effort rather than an actual lack of species. Efforts should therefore be made to assess the habitats on site and their associated species, in order to gain a picture of what the potential impacts of development could be.

Within the allocation site, there appear to be opportunities for wetland and pond creation to help meet national biodiversity targets and achieve targets set out in the WFD. There are already a number of ponds around the site boundary, therefore pond creation within the site would benefit this network and provide potential habitat for a number of species.

There is a tributary of the Boldings brook within the which is currently failing for phosphates and ammonia under the WFD, there is scope therefore to contribute to the watercourse reaching good status by 2015 by addressing these failures. Any discharge or surface water can be run through reed bed systems to provide polishing for water entering the river.

**Natural England**

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
CSR Position Statement	-	Heather Twizell	13/08/09

Warnham Site of Special Scientific Interest (SSSI) is situated approximately 700m to the north of the proposed development area. However, as the site is designated for its geological interest, Natural England are of the opinion that this distance is sufficient for the site to suffer no adverse effects.

The proposed development site also falls close to Brookhurst Wood and Gill, and Morris's Wood Site of Nature Conservation Interest (SNCI). These sites of county wide importance are identified by the Sussex Wildlife Trust who should be consulted in relation to any potential impacts this proposal may have upon the site. They can be contacted at Woods Mill, Shoreham Rd, Henfield, BN5 9SD or by telephone on 01273 492630.

**SE Coast Strategic Health Authority**

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

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.



**Appraisal of Potential Strategic Development Site Option 3: North Horsham – Holbrook Park  
Key Delivery Stakeholder Position Statement  
Background Document to the Core Strategy Review Consultation Document**

**Sussex Police**

<b>Consultation Stage</b>	<b>Respondent/Rep No.</b>	<b>Name of Respondent</b>	<b>Date</b>
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)**

<b>Consultation Stage</b>	<b>Respondent/Rep No.</b>	<b>Name of Respondent</b>	<b>Date</b>
CSR Position Statement	-	Sarah Creamer	25/08/09

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