

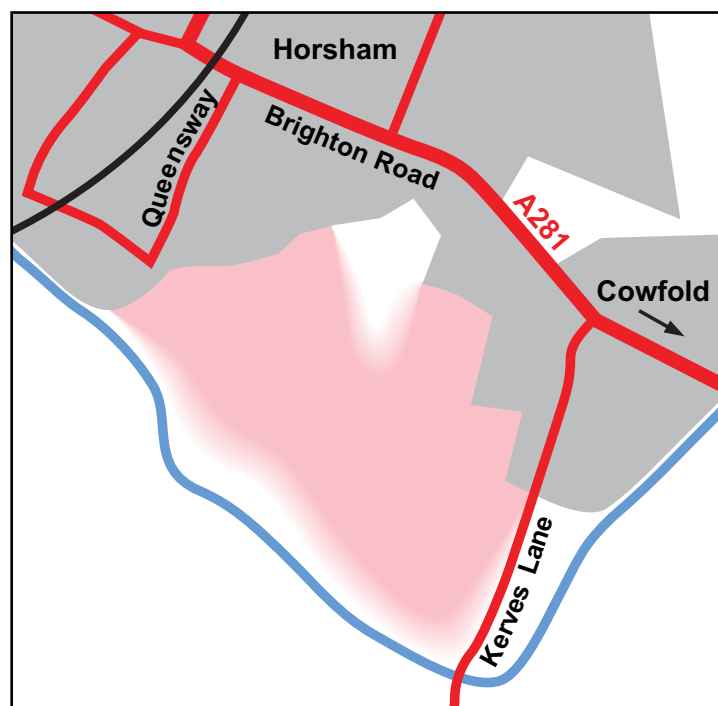


**HORSHAM DISTRICT  
LOCAL DEVELOPMENT FRAMEWORK  
TO 2026**

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

**Key Delivery Stakeholder Position  
Statement**

**Strategic Site Option 5:  
South Horsham / Chesworth Farm**



**September 2009**



**Appraisal of Potential Strategic Development Site Option 5: North Horsham – Chesworth Farm  
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 HA's concern is the cumulative effect of development on the SRN, but being closer to the town this site may be less of a concern. While the HA would want an assessment of this site, the impact is likely to be less than some others being considered.

The HA recommends that a significant level of sustainable travel should be provided with this development. This site has the greatest possibility of and opportunity for a higher level of sustainable travel because of its closer proximity to the town centre. The HA recommends that sustainable travel infrastructure (to include walking, cycling and public transport) should be improved, if this development should come forward.

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

Precise timescales will be advised or agreed at a later date (but well before the site is included in the revised Core Strategy) when a definitive position regarding 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 the mitigation of any 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



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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 will be explored prior to any permission being granted for development. These should be detailed within the Core Strategy Review 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 will be aware the introduction of CIL has been postponed. 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 document '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.

The HA considers this site has the possibility of, and greater opportunity for, a higher level of sustainable travel because of its closer proximity to the town centre

**Metrobus**

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

The South Horsham proposal is much closer to the town centre. In our experience, residential areas this close do not support a high level of bus provision without support as many people will walk to the town centre.

**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



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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.

**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.



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## **WSSCC**

### **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.

- 1.8 hectare site for a primary school.
- 7.4 hectare site for a secondary school.
- £12.8m 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**

#### **Minerals Safeguarding**

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. 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.



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### **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 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)).

### **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 on the south side of Horsham. No direct links to the strategic road network. Potential links to the non-strategic A281 Brighton Road via Kerves Lane. No immediate vehicular or cycle/pedestrian links to Horsham mainline station. The station, itself, also requires forecourt improvements to improve the public transport interchange and pedestrian/cycle provision. There are likely to be significant issues associated with traffic using Kerves Lane and other potential residential roads together with increasing the existing short-cutting problems to the south, particularly to and from Southwater. The existing junctions onto the A281 are also poor and there are capacity and safety issues caused by on-street parking and servicing associated with existing businesses, particularly in the area of East Street approaching Horsham town centre near the railway bridge. Although bus services



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could possibly be improved, there seems little potential for bus priority due to these constraints.

As there are a number of significant transport issues associated with this site, not least its lack of access to any part of the strategic road network, it is difficult to come up with a specific list of transport requirements. However, the following would need to be addressed:

- Lack of access to the strategic road network would increase traffic onto non-strategic roads, particularly the A281. Some form of new southern relief road would therefore be required to mitigate the impact of the development and take traffic away from the town centre.
- There are already capacity (and safety) issues on the A281 in the East Street area. If no relief road is provided then existing and increased congestion would encourage traffic to use other more unsuitable routes into and around Horsham. Traffic is likely to increase most along Kerves Lane, Coltstaple Lane, Southwater Street, St.Leonards Road and Comptons Lane.
- Horsham station and bus station are both some distance from the site and pedestrian/cycle links to these key public transport hubs are poor as pedestrians/cyclists need to cross busy roads and cyclists have to share many routes with other traffic. The cycle/pedestrian networks would therefore have to be significantly improved.
- Horsham station is in need of improvement to improve the station forecourt area to accommodate better public transport access. Regular bus services between the site and railway station would be essential.
- The introduction of new/improved bus services serving the development (including bus gateways where appropriate) would have to be investigated to bypass areas of congestion, 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.



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### **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.

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.



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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**

To make all aware part of the site off Athlestan way is owned by the County Council totalling approx 10 acres. The remainder is, as far as we are aware mostly in HDC ownership.

One consideration for this site has been, and could be, the potential relocation for the Millais school which is close by; but on a substandard site in terms of DfES standards. Whether HDC might consider this an alternate facilitator location to enable the Millais brownfield site to be developed is a possible option - a mix of less Chesworth plus Millais site is a possibility. However, there are no capital funds for a replacement school currently ear-marked for such a project.

**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.



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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 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



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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 records there is a history of flooding associated with Amiesmill Bridge to the south and the ordinary watercourse to the north. We have no information as to whether this problem has been resolved. Part of this site is bounded by the River Arun to the west, and falls into flood zones 2 and 3. This part of the site should not be developed and would not be appropriate for any SuDS features.

**Biodiversity**

Within the allocated area there appear to be records of a number of protected species which would need consideration in any future development. Further survey would be necessary to establish current populations and to assess the possible impact of development in this area and whether it could be delivered without harm to the environment.

In particular there are a number of water vole records on the Arun between Chesworth farm and Amiesmill Bridge. Water voles and their habitat are protected under European and British law. Under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), the places water voles use for protection, dwelling, and shelter are protected. Therefore, it is an offence to intentionally or recklessly damage, destroy or obstruct access to any place which water voles use for shelter or protection or to disturb water voles using such a place. The water vole is also protected against killing, injuring or taking; possession or control; damage or destruction of its places of shelter, or disturbance while such animals are occupying places of shelter, and sale, possession or transport for the purpose of sale, and advertising the buying or selling of such animals.

The watercourse is currently failing for phosphates and dissolved oxygen 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. Obstructions in the watercourse can be evaluated for removal to improve flows and dissolved oxygen, there may also be scope for river restoration to improve morphological diversity and improve connection to the floodplain for storage.

**Groundwater/Land Contamination**

There is an historic landfill site at this location. Development should be undertaken in accordance with PPS23 and where protection is afforded to Controlled Waters from the historic landfill would be seen as an environmental improvement.

**Natural England**

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

Natural England would expect to see an appropriate buffer put in place between any development and the River Arun.



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**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.

**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
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.