



**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 9:
Pulborough Expansion**



September 2009



Appraisal of Potential Strategic Development Site Option 9: Pulborough Expansion
Key Delivery Stakeholder Position Statement
Background Document to the Core Strategy Review Consultation Document

1 Key Delivery Stakeholder Position Statement

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



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EDF

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
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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

Land at Pulborough is 29.7km South West from the Aerodrome Reference Point (ARP) of Gatwick Airport.

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

Highways Agency

Consultation Stage	Respondent/Rep No.	Name of Respondent	Date
CSR Position Statement	-	Peter Minshull	30/04/09

While the HA have not provided statements on the potential development sites at Southwater, Billingshurst and Pulborough they are concerned over the cumulative impact of all development within Horsham DC on the trunk road particularly given the large size of proposed and potential development sites close to the trunk road. The HA would wish to consider this cumulative impact as part of the review of the modelling referred to above. If it is determined that development at any of these three sites has a material impact on the trunk road then the HA would expect the developer to make a proportionate contribution to any improvements to the trunk road. Irrespective of any material impact that may be identified the HA would, in line with Government policy, look for significant sustainable travel initiatives with each of these developments that could also address the level of car-based travel from existing development.

Metrobus

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



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Network Rail

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

Scotia Gas

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

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

Specific sites have to be assessed individually through SGN connections process to determine who bears the cost of reinforcement. Each project is analysed and costed on an individual basis, and each of them can have all sorts of different connotations (such as reinforcement, both chargeable and non-chargeable) that will be dependant on the scale and location of the project / site. Have a look at www.scotiagasnetworks.co.uk, in particular the sections of "Customer" and "Gas Connections". That should give 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	07/04/09

Southern Water supplies water and waste water 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.

Pulborough WTW has headroom with the existing consent to accommodate up to 500 additional dwellings subject to extension of the process capacity at the works.

Thames Water



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This site is outside of the Thames Water catchment area.

WSSC

Education (Children and Young People's Services)

Should however catchment changes not yield sufficient 'freed up' places there may be a need to look to increasing provision elsewhere e.g. in Storrington. In respect of primary provision some capacity may exist in existing schools but the development will need to support the provision of new places

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 Billingshurst and Pulborough potential locations are within the catchment of the Household Waste Recycling Site (HWRS) at Billingshurst. At this time the Billingshurst HWRS would have the capacity to cope with this additional development. However, with the uncertainties in timing of these developments we would like to reserve the right to review this when date and quantum become clearer.

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.

This potential site lies on the west side of the A29. The site has a direct link with the strategic road network. Pulborough has a mainline station, but pedestrian and cycle links to it are poor. Pedestrian/cycle access to the local school and other community facilities are also poor, particularly adjacent to the A29 between Stane Street Close and New Place Road due to narrow footways. This is especially difficult across the A29 railway bridge for mobility scooters and buggies. Improved footway provision along the A29, including a new pedestrian footbridge adjacent to the railway bridge, is a main village priority. However, in addition, an alternative 'off-road' cycle route to the station should be investigated on the west side of the railway line to Church Place. The A283 Lower Street also suffers from poor pedestrian provision and road safety enhancements in the shopping centre area is also a priority.

- A significant contribution towards the provision of a new pedestrian footbridge on the west side of the A29 London Road across the railway line and the widening of the existing footway southwards to New Place Road.
- Investigate the provision of new 'off-road' pedestrian/cycle links to Pulborough station to the west of the railway line.
- A contribution towards road safety improvements in the Lower Street shopping area.
- A contribution towards improving DDA access at Pulborough station in association with the new rail franchisee's station travel plan.



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- A contribution towards speed reducing measures on residential roads which may be subject to increased short-cutting by development generated traffic.
- New bus stops, shelters and real-time passenger information

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
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A 'formal' Position Statement is being produced by the EA, but in the meantime they have provided the following information regarding the land at Pulborough.

Flood Risk

A limited amount of flood zone 3 crosses the site. There are also a number of minor watercourses on site. Essential infrastructure such as main access roads into the site should also be located outside any flood zones. There is known to be a problem with surface water infrastructure.

Much of the area indicated lies on a major aquifer with a relatively shallow water table and a number of surface water features. Controlled waters at this location are sensitive.

There are no specific contamination issues within the defined area, however there are a number of farms, industrial and factory units, railway land and former brick pits which may have resulted in areas of contamination.

There is a single surface water abstraction for the New Farm Nursery Reservoir (TQ05181930) and lies adjacent to the area indicated. Mobilisation of contamination during development may cause deterioration of water quality at this abstraction.

The design and use of SuDS must consider the sensitivity of controlled waters at this location.

Biodiversity

This potential development site is in close proximity to a number of designated sites and impacts upon these needs to be carefully considered, including consultation with Natural England, prior to allocation.

Pulborough Brooks SSSI and Arun Valley SPA/Ramsar site

The land at Pulborough, at its closest point, is approximately 1.4km from Pulborough Brooks SSSI and the Arun Valley SPA/Ramsar site. It is unlikely that the development will have direct impacts on these sites, but there is the potential to increase recreational pressure given the housing numbers proposed (300-400 dwellings). Under the Habitats Directive these sites are designated for their wetland habitats and the bird species that they support. Research has shown that such species can be adversely impacted by disturbance, including recreational pressure. Consequently, an appropriate assessment will be required under the Habitats



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Regulations. Pulborough Brooks already has a visitors centre which helps to manage visitors access on the site and there may be opportunities for enhancement of facilities, habitats and access routes given funding contributions by developers, to help absorb extra visitor numbers.

Upper Arun SSSI

The watercourse running through the potential development site is a tributary of the River Arun, which in this location is designated as a SSSI (Upper Arun). The River is designated for its outstanding assemblage of dragonflies, including some rare species (Club tailed Dragonfly and the Brilliant Emerald). This SSSI and the species it supports are particularly vulnerable to deterioration in water quality and in the past the ecological value the SSSI has declined as a result of water quality problems. These have been addressed by improvements at the Horsham Sewage treatment works, but illustrate the sensitivity of the site and species to changes in water quality. Consequently if the land at Pulborough is allocated as a potential development site, appropriate surface water management will be necessary to ensure drainage does not impact upon the water quality of the River Arun or the Upper Arun SSSI. This is in keeping with the Core Strategy policy CP2.

Middle Barn Farm Meadows SNCI

Middle Barn Farm Meadows SNCI is in the centre of the proposed development site. The site is designated as an unimproved wet grassland site with very rich flora supporting a large number of plant species typical of unimproved wet grassland and fen, including a colony of Southern Marsh Orchids. This site is botanically rich and as such constitutes a Biodiversity Action Plan habitat which requires protection and enhancement as outlined in a number of planning policies (PPS9, NRM5 in the South East Plan) as well as being required within the Natural Environment and Rural Communities Act (2006). Furthermore the Horsham Core Strategy Policy CP1 states that "activities which may influence character should only take place where: protected landscapes, habitat and species are properly protected, conserved and enhance and the biodiversity of the district is conserved and enhanced. Policy CP8 states that provisions may be made in small Greenfield sites where they does not fundamentally undermine the qualities which make them or their countryside setting unique and special. Permission will only be granted where additional local, social and economic needs arise or where development would result in substantial environmental enhancement compatible with the character of the location.

As a consequence of these policies the SNCI area should only be included in any strategic development if it is protected and substantially enhanced.

GIS screening of the development site (phase one habitat mapping) indicates that much of the land within the development area is either improved grassland or urban areas. It should be noted that these data are not always accurate. However, there is a green corridor running across the site, which would need to be retained and protected. This includes the stream and the mosaic of wetland habitats that it supports such as areas of marshy grassland and inundation vegetation, ponds and broadleaved woodland. In making strategic allocations in this location these habitats would need to be retained as they provide an important wildlife corridor and contribute to Biodiversity Action Plan habitats and support protected species such as Pipestrelle bats and Great Crested Newts. Furthermore, the corridor would need to be protected using buffer strips. In doing this the development site as indicated on the map will be split into two and it would prove difficult to connect them.

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 will 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. Within the allocation there are records of the following protected species Great Crested Newts, Pipestrelle Bats, Greater Water Parsnip and water voles populations are known to be expanding in the Arun catchment.



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Opportunities for Enhancement

There are numerous opportunities within the area for enhancement of biodiversity. These include improved management of the SNCI, which would benefit from improved grazing and cutting regimes as well as river and wetland enhancement within the green corridor. Creation of ponds would also be a valuable contribution to the area and help to achieve biodiversity action plan targets. This could be achieved directly during any development or by financial contributions to enable the area to be improved and managed on a longer term basis.

The watercourses which run across the allocation area are tributaries of the River Arun which is a water body designated within the Water Framework Directive. The programme of measures identifies improvements which need to be made in order to achieve good ecological status and development has been identified within the South East River Basin Management Plan as an opportunity to help deliver enhancements and river restoration, either through direct works on site during development or by developers contributions to help deliver such improvements.

Given the ecological constraints within the potential development site and the size of areas which need to be protected the Environment Agency questions the viability of the area as a development site for 300-400 dwellings. If the site is taken forward as a strategic location, it will be necessary to develop supplementary planning documents, such as a masterplan, to ensure that development is appropriate and undertaken in such a way that is sustainable and protects and enhances the environment.

Ground Water / Quality

There is volumetric capacity available at the Pulborough WWTW under the terms of the current consent. Under the draft River Basin Management Plan the waterbody has not yet been fully assessed, however water sampling shows that there are likely to be issues relating to phosphate and ammonia if the draft limits of the Water Framework Directive are retained. Further work will be done by the Agency to fully assess the waterbody. Major development would probably require the works to be upgraded to meet tighter consent limits. Modelling will be required by the Agency to ensure that the tighter consent limits required to protect the environment can be achieved with current technology. If not then growth may be restricted by environmental capacity in the River Storr.

Natural England

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

The potential development area is adjacent to Park Farm cutting SSSI and we would object to any proposed development which would adversely affect the interest features for which the SSSI was notified.

It is also likely that some of the potential areas may have protected species issues; guidance on these is available within the standing advice at 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
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Having reviewed previous correspondence and representations to the Council by SE Coast Strategic Health Authority, records indicate that SE Coast Strategic Health Authority has not previously made comments on this general area. Dialogue between the Council and SE Coast Strategic Health Authority is ongoing to establish the key issues relating to this aspect of the site.

Sussex Police

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

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

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.