

# Site Specific Allocation of Land: Preferred Options

## Analysis and Response to Representations

### Following the Preferred Options Consultation February 2005

The following report contains a summary of the responses received on the Site Specific Allocations of Land: Preferred Options Consultation in February 2004. The responses have been analysed in the order in which they appeared in the document. The text in bold is the Council's response to the issues raised.

#### General Comments

Around 20 general comments were received on the Site Specific Allocations of Land Document. The comments were fairly varied, ranging from general statements of support to more detailed points. There was however a general concern that infrastructure and services, and in particular transport, would be insufficient to cope with the proposed developments, and that further consideration of these matters will be necessary.

The other main issue which arose from these representations was the possibility of developing rural brownfield sites. It was felt that there may be occasions where it would be appropriate to develop these sites in preference to greenfield locations.

**The importance of ensuring the adequate provision of infrastructure and services with proposed developments is acknowledged. The provision of infrastructure is addressed in the Submission Draft Core Strategy. (See also response to representations submitted on Policy AL3)**

**A number of the sites allocated for development within the District are either all or partly previously-developed land; however, even if land is previously-developed it is still required to be in a sustainable location before redevelopment particularly for residential use is considered. For clarification of the approach to developing brownfield sites, please refer to the Response to Representations on the Core Strategy Preferred Options and the Submission Draft Core Strategy.**

#### Chapter 1 - Introduction

Fewer than 5 comments were received on this chapter, but of those that were received most raised concern about the consultation process. It was felt that as the university proposals had been dropped a further round of consultation should have taken place prior to the publication of the Preferred Options. It was also felt that the Analysis and Response to representations did not adequately set out the responses to all development sites that had been submitted to the Council as part of earlier consultations.

**The Preferred Options consultation set out clearly the changed position and enabled further consultation in this revised context. It was important to continue to move forward with the overall strategy and not defer it for ongoing changes affecting any one element of it.**

**The Analysis and Response to Representations on the Issues and Options consultation paper set out clearly all sites which were put forward as alternative sites for development together with a brief summary highlighting the reasons why the site was not considered suitable for development, along with an accompanying map showing the location. It is considered that the information was sufficient for this stage in the consultation process.**

## **Chapter 2 – The Context for this Draft Development Plan Document**

Around 30 comments were received on this chapter. Most comments related to the settlement sustainability hierarchy, and around 1/3 were in support.

Only a few comments received on this chapter concerned the overall development strategy. It was however stated that there needed to be acknowledgement that the Regional Spatial Strategy would progress prior to the adoption of the plan and it should be set out how the plan would be altered to take into account any changes in the housing figures. Other respondents felt that the housing numbers set out were not feasible and other sites, particularly Billingshurst needed consideration.

Most responses on this chapter focussed on the settlement sustainability hierarchy. Of the more general comments received on this issue, it was felt by some that it may be more appropriate to set this information out in the core strategy. There was also general support for the principle of the hierarchy and the ideas that development that takes place should be appropriate to the scale of the settlement. There were however some objections to the categorisation of different settlements within the hierarchy and there were comments requesting that a greater difference was needed between cat 1 and cat 2 settlements, with a need to reduce the number of cat 2. There was support for removing BUABs from small settlements, but that larger settlements should have more changes to their BUABs. Some of the more detailed comments are set out below.

<b>Settlement</b>	<b>Comments</b>
Billingshurst	Support for Billingshurst as a category 1 settlement, although also stated that Billingshurst is more sustainable than Southwater / Steyning & hierarchy needs re-examination
Henfield	Support for Henfield as a category 1 settlement. Considered it should be category 2 as no public transport links to railway
Southwater	Should be category 2 settlement as no public transport
Pulborough	Agree that village meets category 1 criteria, but questions why there are no development allocations in the village
Storrington	Support for Storrington as a category 1 settlement
Cowfold	Should be category 1 settlement
Rudgwick	Supports category 2
Rusper & Faygate	Agrees with category 2 classification.
Christ's Hospital	Both Support and opposition to category 2 classification
Thakeham	Query category 2 status when dependent on employment site which may close.

**Of the comments made on the context of the Site Specific Allocations of Land, those which have been made in relation to the regional spatial strategy and on the overall levels of housing provision have been dealt with through the Submission Core Strategy. This document sets the overall framework for development in the District and increased reference to the regional spatial**

strategy and the reasoning for the number and nature of housing provision is set out within it.

Of the comments which were made on the issue of Built-up area boundaries, it is agreed that the issue should be moved to the Core Strategy as it forms part of the basis for controlling development across the District. The settlement hierarchy has been retained in the Core Strategy following a further study from independent consultants.

Independent consultants undertook further work on settlement sustainability by examining travel to work patterns. This data gives an indication of where people travel to get to work and by inference other facilities. It also gives an indication on where employment is available as well as how well public transport is used.

The results of the study confirmed that the settlement sustainability hierarchy is correct as the larger settlements in the District have more employment, shorter travel to work distances and higher levels of use of public transport. Development would be better in the larger locations as they have more services, facilities, employment and sustainable travel patterns. For the employment and travel patterns to be altered significantly in the smaller settlements a large amount of development would be required. They are therefore suitable for development to meet local needs only.

## **Chapter 3 – Site Planning Principles**

### **AL1 – Built-Up Area Boundaries**

Nearly 80 comments were submitted relating to this policy, the vast majority were proposing amendments to the built-up area boundaries; these ranged from small minor alterations to large sites capable of accommodating many homes. There were also a small number of objections to the proposed alterations with respondents stating they were inappropriate, inconsistent and would result in further development. There was however also some support for the policy and a number of the proposed built-up area boundaries.

A few respondents commented on the proposed removal of built-up area boundaries from some small settlements, this included Five Oaks and Crabtree where it was felt this policy would restrict future development not allowing small communities to grow in a sustainable fashion. There were also a number of other respondents who felt that some of the more sustainable villages should have expanded built-up area boundaries as they have the capacity to grow further, this may in some cases support shops and services and included Storrington, Henfield and Pulborough. There was also a suggestion that the boundaries should be extended even further to take account of the requirements of the emerging South East Plan.

There was particular concern about the impact of development on Broadbridge Heath with many stating that it was classified as a category 2 village and the boundaries should not be altered to accommodate large-scale growth.

There were a number of respondents who considered that the policy should be divided into two, one on built-up area boundaries and another on sustainable development and the settlement sustainability hierarchy. There was also a suggestion that the policy was more appropriately included in the Core Strategy.

Further work has been undertaken and as result there have been some minor changes to the built-up area boundaries. The more detailed responses to this assessment work are set out in Annex 1 of this report.

Of the comments which were made on the issue of Built-up area boundaries, it is agreed that the issue should be moved to the Core Strategy as it forms part of the basis for controlling development across the District.

Independent consultants have undertaken further work on settlement sustainability by examining travel to work patterns. This data gives an indication of where people travel to get to work and by inference other facilities. It also gives an indication on where employment is available as well as how well public transport is used.

The results of the study confirmed that the settlement sustainability hierarchy is correct as the larger settlement in the District have more employment, shorter travel to work distances and higher levels of use for public transport. Development would be better in the larger locations as it has more services, facilities, employment and sustainable travel patterns. For the employment and travel patterns to be altered significantly in the smaller settlements a large amount of development would be required. They are therefore suitable for development to meet local needs only. The settlement sustainability hierarchy is therefore being retained as set out in the Preferred Options. The comment in relation to Broadbridge Heath is noted, and although as a stand-alone settlement it is in category 2 at the current time, the findings of the settlement sustainability work revealed very close linkages with Horsham including in as a source of employment. In addition, the west of Horsham development will provide a significant level of development which will ultimately lead to more employment, shorter travel to work distances and higher levels of use of public transport

## **AL2 – Affordable Housing Delivery**

---

Around 20 comments were received on this policy. There was some support for the level of affordable housing proposed in the policy; however, the majority of those who responded objected. It was stressed that the policy needed to be flexible as sites, both brown and greenfield, could require remediation works that are costly. As a consequence each site must be looked at on its own merits and starting with a requirement of 40% was unreasonable. It was felt that to strictly seek such levels may put the viability of sites at risk, particularly when they can bring forward a range of other local benefits. There was also objection to the possibility of securing 50% on some sites as they will have other costs to meet.

It was stated that there were contradictions between policy CP5 and AL2, in that AL2 sets an expectation of 40% or more and does not acknowledge the flexibility that may be needed. One respondent felt that the policy was not based on a robust evidence base and the thresholds were not justified. It was suggested that the proportions of affordable housing should be judged on a site by site basis taking into account local need or that the minimum level sought should be lowered for example to 25%. There was an objection to the policy as it did not adhere to the recommendations of the housing needs survey, it was proposed that the policy be amended to require the provision of affordable housing up to the level recommended in the survey whilst considering and other costs.

There were varying submissions made on rural exceptions, one respondent felt that permitting such development was contrary to the locational strategy, others supported such developments.

Some respondents objected to the requirement for developers to provide built affordable homes, it was noted that it may also be in partnership with registered social landlords. There was also an objection to the requirement for built affordable homes to be against first occupation, this was felt to be too onerous. It was stated that the policy should also make reference to the role of intermediate forms of affordable housing. There was a request for a definition of affordable housing types.

Finally a few respondents commented on the linkages between policy CP5 and AL2 both, of which relate to affordable housing. It was felt that both policies were unnecessary, a respondent suggested establishing the principle in the core policy and including relevant statements of affordable housing requirements as part of the text relating to specific sites.

**The 2003 Housing Need Assessment undertaken on behalf of the Council by David Couttie Associates demonstrates a potential need of some 7,000 affordable homes by 2011. Although it is not possible to meet this level of need, particularly when compared with the overall scale of development required within the District in this timeframe, it is still vital to meet as much need as possible. The Housing Needs Assessment recommended that in order to achieve this, a 40% affordable housing target should be negotiated on sites. In addition, in response to concerns about the impact on the viability of developments of introducing such a target, a further study was undertaken on behalf of the Council by Adams Integra; 'Assessment of Development Viability and Impact of Affordable Housing Policy' in June 2005. It concluded that a 40% target should be achievable and that it will increase the provision of affordable homes. Due to the level of need we continue to face within the District and backed by the evidence that these targets will not undermine the viability of sites, we will continue to adopt the target of 40% affordable housing on sites of 15 dwellings (0.5ha) or more, or on sites of 5 dwellings (0.16ha) or more in settlements with a population of less than 3,000. However, in response to concerns raised out the need for 'intermediate' forms of affordable housing we propose a target of 25% social rented and the remainder to consist of other forms including shared ownership and key worker housing.**

Underpinning all of this work and the subsequent policy within the Core Strategy is the need to ensure that the delivery of housing for the needs of all the community is not undermined. We therefore propose that the 40% be a target and in response to concerns about the need for flexibility we have made reference to the need for open discussions with developers, particularly where abnormal costs are involved in the development of a site. This particularly reflects the issues that may be involved in the redevelopment of some areas of previously-developed land. The objections to the requirement to provide built-affordable homes is noted but the Council feels that, as the starting point for negotiations, this is the best way to achieve the deliverability of the homes.

In response to comments regarding the inclusion of an affordable housing policy within both the Preferred Options Core Strategy and Site Specific Allocations of Land this has now been amended to include one policy within the 'Submission' Core Strategy (Policy CP12: Affordable Housing). Affordable housing requirements associated with specific site allocations will be set out

in the appropriate policy within the 'Submission' Site Specific Allocations of Land document.

The general support for rural exception sites is noted and a more detailed criteria based policy will be included in the Preferred Options Development Control Policies Document that is being published for consultation in November. Although these schemes are not necessarily within the most sustainable settlements it is felt that it is important to ensure that local people with strong connections to the villages are able to continue to live there.

### **AL3 – Infrastructure Requirements and Community Services / Facilities**

---

There were around 20 comments made on this policy, of these just under half were concerned that the implementation of this policy should not be dependant on planning gain. The policy was felt to be too prescriptive in its requirements on developers, of the comments received a number objected to the policy placing the burden of determining the provisions required on applicants, these should only be requested where justified and therefore the policy was not supported by government guidance. There were concerns that the policy is repeated from CP7 (Infrastructure Requirements) and so the policy should be deleted or reworded. Concern was also expressed that the policy does not relate back to policy AL2 (Affordable Housing Delivery) which should be read as part of the infrastructure costs.

There was a concern raised as to current water supply and sewage drainage problems, and with regards to Brinsbury there was a concern that the site is only coming forward for planning gain reasons. In relation to this there was a comment that planning gain never reaches rural towns and villages.

There were amendments suggested to the policy, just under half of the comments requested the need for police and acute/ trauma health provision to be included in the policy. There was also a request for the impacts of infrastructure in the phasing of development to be considered in policy / supporting text.

Support was expressed to seek contributions for sport facilities through this policy, and there were requests to comment on the planning obligations SPD in due course.

**Clearly, many improvements to local infrastructure will be required as a result of development and they will therefore need to be provided or funded by that development. It is a fundamental principle that all new development, whether large or small, contributes to the demands it places on existing infrastructure, community facilities and public services. Where there is a capacity problem, developers will be expected to fund or to contribute towards the necessary improvements or new provision to serve needs arising from their development.**

**Policy AL3 as set out in the Site Specific Allocations of Land: Preferred Options has been deleted from the submission documents and each proposal will instead be assessed against Core Policy CP13, Infrastructure Requirements, with site specific requirements set out in the relevant site specific policy. Additional guidance on planning obligations will be provided within a Supplementary Planning Document, which, is currently being prepared and formal consultation will be undertaken in due course.**

## Chapter 4 – Site Specific Allocations

### AL4 – Previously Developed Land

There were over 170 comments relating to this policy, the majority were proposing additional sites, for example land at the Trees, East Street, Billingshurst; Horsham Goods Yard and Land at Agates Yard, Faygate.

There were; however, a small number of objections to the inclusion of some of the sites. It was felt by a couple of respondents that further assessment of the sites was required; many were unlikely to be delivered in the timeframe identified; sites were difficult to access; and that some of the villages in which the sites were identified were unsuitable locations for development. As a result some proposed that additional greenfield sites should be released for development.

Finally there was some concern about increased densities of development and the impact on the character of an area this may have. A number of respondents also felt that mixed-use schemes should be considered on many of the sites.

**The sites submitted as part of the Preferred Option consultation have been considered and those with potential to deliver residential development within the time period have been included within the Urban Housing Potential Study. More details on the specific sites are contained within the study. In addition we have reconsidered those sites that it was felt by respondents were unlikely to be delivered and in cases where there is now some uncertainty, they have been removed from the study and the resultant estimations of the previously-developed land capacity adjusted. We are confident in our ability to deliver housing on previously-developed land and have a good track record. In addition we will take a proactive approach to delivering some of the more difficult sites for example, by assisting in the relocation of businesses and using Compulsory Purchase Powers if necessary. We are also aware of a number of sites that may have potential, but due to the current uncertainties involved or site specific issues such as contamination, we have discussed them within the study but they are not currently included within the estimations of capacity. We also anticipate that there will be a number of additional windfall sites that will become available over the plan period. We will therefore not be releasing additional greenfield land but will monitor the situation carefully and provide an update through the Annual Monitoring Report.**

**The concern about the effect that increased densities may have on the character of some areas is understood. There is a balance to be made between the need to focus development on previously-developed land and the need to release greenfield land if enough homes are not brought forward through other means. Horsham District Council has encouraged the production of Village or Parish Design Statements produced by local communities. These set out the key characteristics of an area that need to be preserved when development is being proposed. It is felt that these are important local statements that can help to balance the need to protect the character of an area whilst enabling appropriate development to take place.**

***Roffey - Leisure and Housing Scheme***

There was a lot of interest in the proposals for a mixed-use leisure and housing scheme in Roffey (over 110 comments) and just under two-thirds of the comments received were in support of a scheme taking place in some form. There was a lot of support for updating and improving the whole recreation area as it was often vandalised and crime was a major concern. It was stated by many that the scheme would provide benefits for a lot of people and give younger people and children a place to go to, it would be a focus for the community.

A number of respondents objected in principle to the whole scheme. It was stated that the open space was enjoyed by many and should be protected; housing should not be built on any part of the site and there were concerns about the impact of the clubhouse particularly in terms of noise. There were also some concerns expressed about increased traffic in the area and the safety of school children particularly when considering the access proposed in scheme A1; the roads are already busy and parking is an issue. One respondent felt that a wider area should have been examined.

Two schemes were shown, the majority of those who made a preference supported scheme A1. This scheme proposed the social club in the centre of the recreation area which would minimise the disturbance from noise; make the club house easily accessible from the pitch and training area and provide better access for deliveries. It was requested that the clubhouse be sound proof with air conditioning to reduce the impact on neighbours. Many felt that the new club must be built before the old site is developed

In terms of the design of the scheme some felt that 3 storey housing was acceptable as there was similar in the locality, but some were concerned about overlooking, one respondent wished to see a more imaginative layout and suggested a design competition. It was also felt by a couple that the density may be too high. There was support for the two-tier club house but concern from some about the proximity of the car parks and access roads to residential properties and the number of routes through the site. There was support for improved boundary treatments but care is needed not to impact on adjacent properties e.g. with tall trees. Some concerns were expressed about the location of the playgrounds. Many respondents raised concerns about the impact of crime and vandalism in the area and felt that measures to mitigate the effects needed to be incorporated into the scheme.

A number felt that the floodlit training area and associated activities may affect neighbouring residents particularly in terms of light pollution. It was queried as to whether these facilities were available at Broadbridge Heath and therefore not needed in this area. There was also some support as the all-weather pitch will be useful at times when the ground is water logged provided the lighting was turned off at a reasonable hour. There were requests for junior pitches to be provided as part of the scheme and a consideration of other sports apart from football.

There were varied comments on the housing proposals. Concern was raised about the level of affordable housing, where as others felt it was needed in the area, some suggested shared-ownership. There were concerns about the level of traffic that may be generated. There were many respondents concerned about the loss of the bungalows on Bryce Close and the effect this would have on the residents most of whom are elderly. There were a number who wished to see them retained and the scheme designed to include them and many queried what would happen to the residents.



Some suggested other locations for development including the eastern end of the recreation area, parts of Northolmes School, redevelopment in the Leith View Road area and the development of the whole area moving the facilities to Moorhead roundabout area.

**The Council has taken these comments into account and notes the conflicting views that have been expressed. However, it fundamentally feels that the area is in need of improvement to provide a range of better facilities for the community and assist in reducing petty crime and vandalism. This principle has been supported by a large number of the representations that have been received. There is still much work to be done and many of the concerns about the detailed scheme proposed, including noise, access and design, will be investigated further in the preparation of a revised proposal. This is likely to be a long-term project that will need the continued involvement of the community to make it a success.**

## **Chapter 4 – Site Specific Allocations**

### **AL5 – Land West of Crawley Strategic Location**

Over 190 comments were submitted relating to this policy, the majority being opposed the proposal. Many argued that the allocation should be deleted from the Preferred Options. Arguments in opposition to the allocation include: loss of green field land, the land is in the strategic gap, that brownfield land should be considered first, inadequate infrastructure and service provision including schools, health care and shops and lack of employment provision. Many respondents also argued that the policy is based on inadequate evidence and that the plans do not show the full extent of the flood plain. There were also concerns that houses for Horsham would be built close to Crawley town and that additional pressure would be placed on the Borough Council to provide the necessary facilities to serve the neighbourhood. Other concerns related to the impact of development on the conservation area and existing built and natural environment, inadequate public transport provision and loss of ancient woodland.

Some respondents queried the deliverability of the development given the uncertainty of Gatwick airport and argued that the allocation is premature. Others were concerned about the cost implications and whether it could be delivered within the plan period. Some argued that the allocation would not be possible without the relief road and that without it the policy does not comply with the Structure Plan.

A number of respondents were concerned about the slow progress and said that West of Crawley should be given highest priority as set out in the Structure Plan. There were also a number of objection to the relocation of the golf course to within the noise contour of Gatwick Airport and flood zone.

There were also a number of comments in favour of the allocation with a majority stating that the allocation is appropriate to meet future needs and that it is in the right location, close to the airport; that it is a logical extension to the town and that the proposal would relate favourably to the existing built environment. Others argued that the development would provide the necessary employment provision and sport and recreation facilities.

Many respondents suggested that further studies such as flood risk assessment and transport assessment should be undertaken jointly with Crawley and that any

decision should be delayed until a sound evidence base had been established. Others suggested that land West of Bewbush would be more suitable for development whilst others argued that the provision should be made closer to Horsham town. Other suggested further investigations to be undertaken to identify alternative site at Crawley whereas others said that a new town in the M23 corridor would be more suitable to meet the housing needs. There were also suggestions of a reduction in number at West of Crawley and to find remaining number in the Category 1 settlements.

**Land west of Crawley has been identified for development in recognition of the need to support economic growth in the Crawley/Gatwick area and to provide for Crawley's internally generated growth. It is not considered that any alternatives exist within Horsham District which would secure the sustainable urban extension of the dynamic community of Crawley. Comments in relation to the use of greenfield land as opposed to brownfield are noted. However, given the scale of the projected need for additional homes in and around the Crawley/Gatwick area, it is not considered that this can be accommodated solely on brownfield or previously developed land. Moreover, the sequential approach advocated by Government policy and reflected in the Structure Plan identifies urban extensions as a priority. Such extensions to existing urban areas are likely to prove the next most sustainable option after building on appropriate sites within urban areas, especially where it is possible to utilise existing physical and social infrastructure, there is good access to public transport (or where new public transport provision can be planned into the development), and there is good access to jobs, schools, shopping and leisure facilities.**

**However, it is considered necessary to undertake additional work prior to any formal decision being made on the precise location or phasing of the development. The Council recognises that it is essential to ensure the delivery of an appropriately sited new neighbourhood which will maintain the local development pattern whilst meeting the social and economic needs of people wishing to live and/or work in the area. Issues such as infrastructure, including the need for a new relief/access road, flood risk assessment, the possible relocation of the golf course and the impact the development would have on the environment, including the Strategic Gap and established residential areas are key for delivering a sustainable development. It is anticipated that further joint studies with Crawley Borough Council and key stakeholders will address the issues raised through the consultation exercise of the Preferred Options and that this approach will enable the authorities better to understand and take account of emerging documents such as the South East Plan. Additionally, it will allow for a clearer indication on the future at Gatwick and the likelihood of a second runway being built at the airport. These further joint studies will be undertaken as a matter of urgency and will, once completed, assist the Council in determining the most appropriate location for the development of some 2,500 and associated facilities west of Crawley and ensuring the deliverability of the development within the plan period by 2018.**

#### **AL6 – West of Horsham**

---

There was significant opposition to development proposals west of Horsham with over 200 comments received. In terms of the principle of development a considerable number felt that Broadbridge Heath would become joined with Horsham and lose its character, identity and sense of community. It was felt that the proposals did not fulfil the requirements for an urban extension and did not accord

with the EIP recommendations. There were also significant levels of objection to more than 1,000 homes being identified and many felt development should be contained solely within the A24 including Rookwood Golf Course; this is discussed separately below. There were also those who objected to development within the A24.

There were a number of concerns expressed over the potential for further development post 2016, conversely some respondents felt that the plans were not flexible enough and questioned the potential of the site to deliver the required number of homes by 2016. As a result alternative sites were suggested including land north of Broadbridge Heath, land at Hop Oast and a few much smaller sites. There was also a request that the Area Action Plan be progressed quickly to enable an earlier start on development.

There were many concerns about the impact of development on the environment, particularly the River Arun. Some felt the development was too close to the floodplain and would lead to pollution, there were also concerns about potential flooding problems and a respondent felt that land to the south of the river was prominent in landscape terms. There were objections to the loss of countryside and greenfield sites, open space, biodiversity, wildlife corridors and important species; this was felt to be contrary to policy and legislation. There was also a concern about the impact of development on the adjacent High Wood SNCI. Other concerns raised included the impact of development on some of the historic lanes in the area and the closeness of the sewage works and Baystone Farm to the development. It was also felt by some that the density of development was too high and left limited room for recreation. Suggestions to mitigate some of the issues raised included retaining all existing footpaths and bridleways to give easy access to the countryside, monitoring flora and fauna for 12 months; retaining all hedgerows and wildlife corridors, relocating badgers if necessary and involving local groups in the design and implementation of a scheme.

The impact of the roads, highway network and new junction was a frequently mentioned concern. There was a feeling that not enough was known about traffic flows and mitigation measures and there was a significant level of concern about congestion and rat-running particularly through Broadbridge Heath and Warnham, as well as the impact on Hills Farm Lane. It was felt that the roads would be noisy, dangerous and could pollute the river. It was also suggested that the development was not in a sustainable location due to the lack of a train station and other alternative forms of transport. There was both support and objection to a further park & ride and a number of queries and concerns raised about the bus link to Hills Farm Lane. It was felt that further work was needed on the road infrastructure and that opportunities for sustainable travel including for pedestrians and cyclists have to be considered. Cycle links between the development, Horsham and Slinfold were suggested.

Many comments were made on the ability of the infrastructure, facilities and services to cope with the development. It was felt that most were under pressure, but in particular there was significant concern over water supply, doctors, dentists, recreation and hospital provision. Some felt that no development should proceed without an A&E Hospital in the area. There was a request for the services and facilities to be in place before development took place. Some suggested the need for more shops, but others questioned their viability adjacent to Tesco, there were a significant number of requests for allotments in Broadbridge Heath and some concerns over the potential for anti-social behaviour linked to a new pub / restaurant. New community facilities were requested in the Hills farm Lane / Needles area as

well as enhanced sporting / recreation facilities. There were also a limited number of comments submitted on employment in the area, some felt the homes would only be occupied by those working in Crawley and Gatwick and therefore Horsham was the wrong location for development. There were others who queried where people would work; conversely some felt there was no need for further employment in the area. There was a request to consider the expansion of Tesco and improved access to the supermarket.

Finally there were a number of responses submitted on the affordability of the homes. It was felt that most would not be affordable, it was also suggested by some that the homes should only be for local people. Some wished to see affordable housing maximised where as others had concerns over the levels proposed and suggested reducing it to 10% social rented and 30% other forms of more affordable housing.

Some respondents supported the development stating if it must proceed and that the location was less damaging than other alternative sites, particularly Rookwood. It was felt that it was a comprehensive approach that would provide affordable homes; homes for people wishing to remain in the area and could provide 2-3 bed properties needed by many.

### ***Rookwood Golf Course***

As discussed above many of those opposing the development particularly south of Broadbridge Heath felt that it could be accommodated on Rookwood Golf Course. A number felt that the case for not developing the course had not been proven and development costs would be less than those needed for the proposed new junction on the A24. It was felt that site should be investigated further.

However, we also had a significant number of responses from people objecting to any proposal to build on the course. The area was originally part of a nature reserve and partial development as a golf course had only been acceptable on it as it would safeguard the area against further development. People wanted to see recreational areas protected; they were felt to be important to residents of the town as it becomes more built-up; the A24 was considered a barrier for residents wishing to access the wider countryside and open space was needed within the A24. It was a popular and mature course. Development of the site was also objected to due to the damaging effect on Warnham Nature Reserve, the impact on wildlife, the removal of many mature trees and the need for many roads to cross the floodplains. Many respondents felt that the golf course should be excluded from further investigation and should be protected from any future development.

**In response to a number of the concerns raised and the wish by many for us to re-examine other alternatives to that proposed west of Horsham, we have produced a technical background paper. This paper looks specifically at the development options we have considered in this area and why we feel that the approach put forward is the most appropriate strategy. Further explanation is also included within the Core Strategy. This background paper is available on request from the strategic and community Planning Department or via the website [www.horsham.gov.uk/strategic\\_planning](http://www.horsham.gov.uk/strategic_planning)**

**Many respondents commented on the Structure Plan Examination in Public (EIP) Panel Report and felt that the Council was not complying with the recommendations. Horsham District Council contests this opinion and feel**

that we are in full accordance with those recommendations. Paragraph 6.55 of the EIP Panel Report states that;

*“Provided that development is planned in an integrated way around the periphery of Horsham’s urban area and well related to existing communities and services, transport provision and other infrastructure we have no views on what its precise form might be. That said, we do see advantages in maximising development between the A24 and the edge of the urban area as the most obvious extension.”*

It is clear to the Council that the proposals for west of Horsham fully accord with the principles set out in the EIP Panel Report. We have proposed development in a location that is well related to the existing communities of both Horsham and Broadbridge Heath, services, transport and other infrastructure. In addition it maximises the development potential of land between the A24 and Horsham as recommended.

In addition paragraph 6.60 of the EIP Panel Report also stated that;

*“Though we say that the allocation should be 1000 we have not ruled out the prospect of an increase later if it were to be needed and the capacity is found to exist. We would suggest that the assessment of this location should have regard to this possibility so that sufficient flexibility exists. Horsham DC will in any case wish to consider needs beyond 2016.”*

Again the Council feels that in examining the capacity of the wider development area west of Horsham it is working generally in accordance with the recommendations of the Panel Report and not directly contrary as has been suggested by many. In addition and regardless of the interpretation of the Panel’s Report we are also following the guidance set out in Planning Policy Statement 12: Local Development Frameworks (PPS12) which states in paragraph 4.22 that;

*“After commencement of the Act there will no longer be a requirement for local development documents to be in general conformity with structure plans. However, the structure plan policies will still be a material consideration and will remain part of the development plan until superseded by the regional spatial strategy. In the event of conflict between the structure plan and the regional spatial strategy, the conflict will be resolved in favour of the last document to be adopted, which increasingly will be more likely to be the regional spatial strategy rather than the structure plan.”*

The Council is therefore not required to be in conformity with the Structure Plan but does consider it to be a significant material consideration. However, The South East Plan (the Regional Spatial Strategy for the South East) is also at an advanced stage. Part 1 on the Core Regional Policies was submitted to Government for approval on the 29<sup>th</sup> July, Part 2 covering the Sub-Regional Policies will be consulted on this autumn. Horsham District Council is therefore in full compliance of the recommendations set out in PPS12 in taking into account the emerging South East Plan and as set out in the EIP Panel Report the need to consider the area beyond 2016 particularly in the light of the likely requirements for further housing development. The Council feels that taking a comprehensive, long-term approach to the development of this area is essential. It will ensure that the right infrastructure and services can be

provided for the whole community and that the short-term approach is not adopted leading to further disruption in the future.

We acknowledge that there is considerable concern about the proposed development and that many of the issues relating to the detailed planning of the area are yet to be fully resolved. However, we feel it is important to establish the principles and key objectives, including the extent of development, the timescale involved, the environmental impact including flooding, and the highways, infrastructure and facilities needed before moving on to the more detailed elements of the scheme. This more detailed work will be carried out over the coming year and will involve both technical experts and the community. Whilst we can respond in general to the key issues we have also noted the detailed site specific comments which have provided us with a good knowledge of the issues that need to be addressed through the masterplanning.

### **Environmental Impact / Loss of Countryside**

The priority in terms of developing new homes and businesses is through the re-use of previously-developed land. The amount of previously-developed land within the towns and villages, including the scope to re-use existing buildings and the capacity of these sites has been extensively surveyed. A detailed analysis is contained within the Horsham District Urban Housing Potential Study 2004 – 2018 published as a background document to the ‘Submission’ documents. However, no matter how efficiently previously-developed land is used, greenfield land is still required to meet the development requirements. In line with the approach contained within the Structure Plan most of this development should be concentrated in large-scale, mixed-use developments such as that planned for west of Horsham.

A preliminary analysis of information on important species and habitats has been undertaken and further survey work will be carried out at the appropriate times in the year. Measures to ensure the protection of such species and important habitats will be incorporated into the more detailed master planning and the advice of relevant specialists and organisations will be sought. A similar exercise will be undertaken for areas of historic interest.

### **Flooding**

The Environment Agency is in contact with both the Council and the developers involved in planning for West of Horsham. A detailed map of the floodplain has been produced, and agreed by the Agency, that estimates not just the 1 in 100 year flood plain but also makes an allowance for both an increase in flow of some 20% to allow for the potential impact of climate change and the effect on the flow of any bridges. It has also provided further guidance on the measures that must be implemented to protect the river and other water courses within the site. This work will be revised in line with the more detailed masterplanning and we will continue to work closely with the Environment Agency.

### **Highway and Transport Network**

The transport network and access to the areas of land proposed has been an important issue to address. There are no easy solutions wherever the development is proposed; however, we feel that the proposal we have

presented in general terms within the Core Strategy is the most appropriate and sustainable solution and gives priority to public transport, walking and cycling. It is also recognised within the strategy that it is important to ensure that the impact on the existing network is minimised. Detailed work, including a full traffic impact assessment will be undertaken as part of the master planning over the coming year to address the main concerns raised.

### **Infrastructure and Facilities**

We acknowledge the concerns expressed by many that elements of the infrastructure in this area are under pressure and are we are in contact with the main utilities companies, the County Council and the Primary Care Trust. Through these discussions we have identified issues that need to be addressed and will continue to work with all parties and the developers on ensuring that the development does not impact on existing communities whilst also providing for the needs of the new development. The main infrastructure issues relate to the sewage capacity, water supply and electricity; however, through our discussions there is no evidence to suggest that these issues cannot be overcome and we are advised that our early contact with the parties involved is welcomed and has assisted the appropriate companies to plan for the future. We will also collectively be working on measures to ensure that the development reaches high standards of sustainability and incorporates many measures to reduce the consumption of resources.

In addition we have had discussions with Southern Water in connection with the current hosepipe ban (the first since 1996) and are informed that this has been an exceptional year and that there are no insurmountable issues relating to the ability to supply water to the new development. Southern Water have prepared a Water Resources Strategy to cover the period to 2030 based on projected growth which ensures that water will always be available for essential use but that restrictions may be imposed on the use of water for non-essential use in times of drought. Southern Water also concludes that increased development across the South East as a result of the potential requirements of the South East Plan can be accommodated provided:

1. new buildings incorporate water efficiency measures;
2. construction of strategic reservoirs in East Sussex and Kent are permitted; and,
3. the timing of development takes account of the lead time required for construction of the new reservoirs.

Of particular relevance to the land west of Horsham is the first requirement for water efficiency which we will require as part development.

### **Alternative Sites –**

#### **Rookwood Golf Course**

As discussed we are publishing a background paper that looks specifically at the options considered in terms of development West of Horsham and why we feel that the approach put forward is the most appropriate. This background paper is available on request from the strategic and community Planning Department or via the website [www.horsham.gov.uk/strategic\\_planning](http://www.horsham.gov.uk/strategic_planning). This will contain a further analysis of the issues regarding Rookwood Golf Course; however, as stated in previous publications the Council still maintains that it is

not an appropriate location for development; it is detached from the town, would cause significant environmental harm and does not fulfil many of the sustainable development objectives.

### **Other Sites**

The background document will also examine some of the other sites proposed for accommodating development West of Horsham, including land north of Broadbridge Heath.

### **Table 5 – Greenfield Allocations**

---

There were around 40 comments made on Table 5 in the document. Most of the representations were promoting other sites for development or inclusion in the BUAB, claiming that the sites currently proposed for development in the Site Specific Allocations document are not based on robust credible evidence base. Other reasons for the suggested inclusion of sites included the a perceived need to identify more housing provision to 2016, querying the deliverability and sustainability of a number of sites (including the deliverability of the strategic locations). Some representations also considered that the RSS will include higher numbers of development than that set out in the Structure Plan and therefore allocations should be in excess of Structure Plan levels with more Greenfield sites needed. It should be noted that comments on the Housing Strategy were also made under policy CP4.

In addition to the comments on table 5, several respondents made comments on alternative development sites shown at the exhibitions and discussed in the Analysis and Response to Representations on the Preferred Options. Again many of these representations suggested sites for development whereas others supported the Council's exclusion of land. There were also concerns that the reasons for refusal of some sites were uninformed, and in Rudgwick / Bucks Green it was considered that residents should have been able to comment on all sites before some rejected.

**A list of sites suggested for development throughout the consultation process is being collated and will be re-examined. New sites suggested will be assessed as appropriate and compared with the sites suggested on previous occasions. Consultants are currently independently examining the sustainability hierarchy and once the results of this are available this work will also influence the assessments of the sites. – SORT NEED ANNEX B OMISSIONS SITES**

### **AL7 – Land at Meiros Farm, Ashington**

---

There were about 15 comments on this policy. The majority objected to the proposal, but there was support for the retention of the existing farm house and of as much of existing hedgerows and trees as possible. Conversely there was concern that renovation of the farm house may not be possible because of deterioration and time for planning permission to be given. There was a preference for sheltered housing rather than low-cost housing as an edge of village location was too far from facilities for families; and that the dwellings, be they affordable housing or sheltered accommodation, should be limited to local needs. There was some support for the allocation as the site is brownfield land, however it is outside the built-up area boundary.



There were a number of concerns about traffic on Rectory Lane and that access from Rectory Lane into Meiros Way was dangerous. There were concerns about inadequate drainage, and it was felt that there were not enough school places so extra provision at the village school is needed. Concern was expressed about the density of the proposed development not being in keeping with the existing housing, leading to concerns about overlooking and noise, and there being too many new houses already in village.

There were concerns about breaching a buffer strip round Ashington, encroaching into countryside, the site being on the edge of village so most journeys will be by car, and that the development would set a precedent. It was suggested that there are better locations closer to the village centre, one respondent stated that the site is unsustainable as only just a category 2 settlement and is inferior to other sites on periphery to larger settlements. Concern was expressed that the allocation is not based on upon a robust and credible evidence base.

Amendments suggested included restricting the site to affordable and sheltered housing; changes to the density (both increases and decreases suggested); further investigation into the conversion of the farm house; increased planning gain from development and deletion of the allocation from the Plan.

**The Council has taken into account the representations received as well as further work carried out on the site; as a result Merios Farm will remain allocated in the Sites Specific Allocations of Land Submission Document for future development.**

**Access to the site will remain as identified via Rectory Lane, the policy now additionally stating that improved access to the site may include improved safety measures at the junction of Rectory Lane and Merios Way. The policy now also specifically refers to the provision of affordable housing and/or sheltered housing accommodation for the elderly, to meet locally identified needs, in accordance with Core Policy CP12.**

**Regarding densities on the site, planning policy guidance requires the most efficient use of land, therefore higher densities are now required on development sites. The affect on the character of the area and neighbouring properties will be considered at a planning application stage and a suitable scheme agreed.**

**The affect on the surrounding countryside is a concern and therefore the policy specifies enhancement of the tree/hedge line on the northern boundary of the site, as well as the provision of boundary landscaping to protect the amenity of neighbouring properties. Further discussions with the water and sewage providers have not excluded the site from development, and contributions for services and facilities would be required from a developer when development takes place.**

**Another addition to the policy is in relation to the improvement of infrastructure, including the provision of more sustainable transport choices, services and community facilities, the policy specifying that contributions will be required unless it is demonstrated that the site or local circumstances do not justify such a provision, in accordance with Core Policies CP13 and CP20.**

**The conversion of the existing farm house is still specified in the policy; there was support for this but also concern about the viability of the reuse of the**

**building. The Council does not wish to encourage further development than that proposed in Ashington; therefore, it has refused the inclusion of other proposed sites put forward as omission sites in the consultation period(s).**

#### **AL8 – Land at Forge Way, Billingshurst**

---

Few comments were submitted relating to this policy. The main concern was the loss of open/green space. It was suggested that only half the site should be allocated for development.

**There is now an outline planning permission on the site for 59 dwellings, the outline permission identifying a children's play area at the north eastern corner of the site, near the proposed access. Adequate alternative provision for sports and recreation has already been made in the area to counteract the loss of this site, and the legal agreement would secure significant benefits which would outweigh any residual harm.**

**In the conditions of the outline permission details of the siting, design and external appearance of the buildings, the means of access and the landscaping of the site will be obtained from the planning authority before any development commences. With regards to the play area there is also a condition that the size and location shall be submitted and approved in writing by the local planning authority, and no dwelling shall be occupied until such facilities have been constructed in line with what is agreed.**

**There are 17 conditions on the outline permission that will be taken into account when a full planning permission is received for the site. The layout of development and the children play area being issues that will be addressed at the time of application.**

#### **AL9 – Land at Hammonds, East Street, Billingshurst**

---

There were over 10 comment on this, the majority were objections. There was however some support for the development, with respondents considering it to be of a scale appropriate for the village, a logical defensible boundary to the village, and would provide publicly accessible woodland.

There were concerns about the felling trees on site and that had it not happened, the land would not have been considered. There was concern at the loss of a natural gateway to village affecting the quality of a scheme. The site used to be mostly woodland and not a field as described in the policy, and a habitat to protected species. There was however support for the placing of Tree Preservation Orders on remaining trees at the site.

The need for the development of a greenfield site was questioned, another comment being if there is development at Billingshurst it should be large scale and not in the village itself. There were a number of queries about the woodland having further public access as there is already public access, one concern being if the woodland was given to council or parish council it would result in extra cost for residents. The need to maintain woodland for wildlife and amenity was recognised.

There were a number of concerns about impacts on traffic and congestion, there were also concerns about increased pressure on services and facilities and that the historic characteristic of the site may be affected. There were concerns about

potential flooding issues and that flooding is a common problem in the area. It was also felt that 25 homes are too many on the site, the site is significantly constrained due to trees and access, more open space should be provided, wildlife should be protected and that the village does not need further new homes at the moment.

Screening for adjoining properties and more information about layout and design was requested. It was felt that the development should not detract from the existing historic buildings and that footpaths will need to be maintained for better access.

**This site is considered suitable for development and has remained as an allocation in the Sites Specific Allocations of Land Submission Document.**

**The Council was concerned with the way this site was cleared of the woodland and any associated wildlife, and the Council's Arboriculture Officer (once notified) placed Tree Preservation Orders on all the remaining trees.**

**There has been further investigation carried out regarding the woodland to the north of the site with the policy changed to reflect this. The policy now specifies woodland to the north of the site to be retained and enhanced with appropriate management, particularly in terms of public access. The Council feels that public access is important; however, as there is good public access at this time, the policy now identifies the importance of retention and enhancement of the woodland being a requirement with any development.**

**This area is recognised in the Horsham District Council Landscape Character Assessment as a distinctive gateway to the village, it is not considered that development at this site would affect this if carefully designed and mature trees protected as stated in the policy, as well as the woodland to the north being retained and enhanced.**

**This site is a small greenfield site; some support was expressed for large scale development at Billingshurst, however the Council does not wish to encourage large scale development in this location during this plan period. The site at Hammonds is considered to be a logical boundary to the village.**

**It has been confirmed by West Sussex County Highways and Transport Department that a suitable access is achievable at this site. Regarding densities on the site, planning guidance requires the most efficient use of land, therefore higher densities are required now on development sites.**

**Services and facilities and traffic implications among other aspects are considered in order to determine the optimum development density for a site and contributions required from the developer. The setting and design of the development and any impact on the character of the area will be of particular concern at a planning application stage, with the impacts on neighbouring properties and the conservation area being a particular issue that will be considered before approval for a suitable scheme is given.**

#### **AL10 – Hornbrook Farm / Hilliers, Horsham**

---

A significant number of comments were received on this proposal (over 430) and views were very varied. Many commented on the different aspects of the schemes, these are summarised below.

Housing – It was felt by a considerable number of respondents that housing development at Hornbrook Farm would impact on the area between Horsham and the AONB; this was felt to be a buffer zone between the town and the attractive countryside. There was also significant concern over the impact housing may have on the character of this entrance point into the town, it would be visually intrusive as the site is on high ground and views would be spoilt. Many people objected to a development on greenfield land. There was concern about the impact on wildlife and the environment, particularly the Horn Brook, and the potential for increased run-off to lead to flooding and pollution problems; the development was felt to be too close to the river. It was also felt by some that there was not sufficient infrastructure to support the residents of the homes, e.g. school, shops, surgeries and in particular there were many concerns about the existing level of traffic on the A281 and surrounding lanes, which, could be worsened by this development.

In contrast some felt that the housing development would assist the Council in reaching its housing target and that it was a good site providing a balance of housing types including affordable housing.

Park & Ride – Many respondents felt that park & ride was not needed in this location or in the town as a whole. The existing Hop Oast site was considered under-used and it was felt that a new site would be poorly used. Many commented that there was plenty of parking in the town; that the nature of the town and shopping was changing; and that there was currently no need for further parking. Many stated that there were already traffic problems in the area and a park & ride scheme would worsen the situation. There were also objections to the car park due to noise and light pollution.

A number of respondents felt that a park & ride site would ease traffic on the A281 Brighton Road and that the existing site at Hop Oast was well used. The development of park & ride would also free up parking space in the town centre.

Stadium – The football stadium proposal received many comments. There was a significant split in opinion with many strongly opposed but equally many supporters. It was considered that the scale of the proposal was out of keeping with the area, and far bigger than the club required. There was considerable opposition due to the impact of lighting, noise and traffic on the area. The stadium was considered unsuitable in an area with residential properties and there were concerns over vandalism. It was queried if the club and proposals were self-financing and whether there was enough parking if a capacity match was to take place.

In contrast there was also significant support for a stadium in this location. Many felt a town the size of Horsham required a good ground and facilities, there were fears that if this development was not permitted the club would be lost as it had been searching for a new ground for many years. It was felt to be an important sporting and social facility which could bring many benefits to the community and that its current location was unsuitable. It was stated that the club would be self-financing and not require any tax-payers money. A new ground was essential for the clubs survival. The site itself was considered to be low lying and easily accessible by foot. Floodlighting would be to modern standards which combined with the number of matches likely to take place needing such lighting would have minimal impact on surrounding residential properties. The development of a new ground would release the old site for town centre residential development and would lessen the overall number of people affected by the club.

Many general comments were received covering the whole proposal. Again there was some support for the comprehensive approach but some felt all the elements should be considered separately. Many respondents commented on the impact of development on the area and the fact that proposals on the site had been refused a number of times in the past. It was stated that there had been no changes and therefore no reason to allow development. There were concerns about the steeply sloping edges to the site and the impact on the Horn Brook. There were objections due to the impact on the environment, including the loss of trees and hedges and increased litter, particularly if the riverside walk was introduced. It was felt by some that the walk would increase the chances of crime in the area and make the rear of their properties insecure. There were many concerns about the levels of traffic in the area and danger to pedestrians. It was considered to be an unsustainable proposal that may lead to further development.

Although a number of respondents supported the proposals and felt that no changes should be made, there were also a significant number of alternatives proposed. In particular this included the development of a football stadium at either Broadbridge Heath or Hop Oast where it was considered that access was easier and the impact on communities would be less. In terms of housing, it was felt that if it must be built, it should go elsewhere; there were few alternatives suggested but they did include Chesworth Farm or the allotments on Athelstan Way. Some suggested a reduction in the number and density of development at Hornbrook Farm might be appropriate. There were many respondents who felt that traffic problems must be relieved suggestions included building a by-pass linking the A24 to the A264. Finally a number of respondents stated that there was a need to ensure that utilities and services were available to support any development.

**This scheme was proposed on a comprehensive basis and was intended to bring a number of benefits to the town. The Council however acknowledges the wide ranging concerns that have been expressed and has re-examined the issues and the level of priority that should be attached to some of the benefits of the scheme.**

**Following the Local Development Framework (LDF) Preferred Options consultation in February / March 2005 work was commissioned to review the current parking strategy within Horsham town centre and how any future need, if identified, may be met, including the role of park & ride. The Council felt it needed to understand the various choices available in terms of meeting current and future parking requirements before making decisions that might either remove opportunities or commit the Council to future strategies and expenditure.**

**The principal objective of the study was independently to analyse parking supply and demand within Horsham town now and in the future; and, to establish methods of dealing with any issues that may arise. In particular the study was to consider whether Horsham District Council should be planning now for future provision of parking or conclude that there is no short / medium term problem and therefore no need to pre-empt the situation. The work also had to recognise that the role of the town may change over time.**

**The study can be viewed on the Council's website [www.horsham.gov.uk/strategic\\_planning](http://www.horsham.gov.uk/strategic_planning) upon submission of the LDF. In summary the report found that there was capacity within most of the car parks in the town, but that there also appeared to be evidence of an increase in usage recently. A more detailed summary of the key findings and its implication on**

the planning strategy for the town are contained within a background document (Horsham Town Park & Ride Study, 2005). In conclusion the independent consultants recommended the following options:

1. Manage the demand for parking;
2. Reduce the demand for parking;
3. Increase town centre parking supply; and,
4. Provide new park and Ride sites outside the town centre.

They recommended that the first two options should be investigated further and that the policies relating to the increase in town centre parking supply and the provision of new Park & Ride sites should be retained for future consideration if the demand for parking significantly increases. It was felt that it would be worth considering the decking of car parks and the implementation of a further Park & Ride site as part of the development west of Horsham. They did not propose that a park & ride site should be implemented at Hornbrook / Hilliers as a priority but that it could instead form part of a network of sites around the town and its usage could be increased by the development of the proposed housing site. Therefore the Council considers it appropriate to investigate further the first 2 recommendations and will monitor the usage of the car parks in the town. It also proposes to implement a park & ride scheme as part of the strategic development west of Horsham but will not at this stage progress further with plans at Hornbrook / Hilliers. This will be reconsidered should there be a significant increase in the demand for parking or congestion in the town.

There were significant numbers of objections to the proposed location of the football stadium. However, the Council continues to wish to assist Horsham Football Club as far as is possible and there has also been considerable interest from many residents in the District and further afield in securing their future. We consider that there are other options available including within the strategic development west of Horsham which will be investigated further. In addition it was felt that the location of the club could be successfully linked to park & ride provision but again as this scheme is not considered a priority this benefit is not a determining factor.

Many concerns have been raised over the location of the housing development. It is felt that these could be overcome by detailed masterplanning; however, this was part of a comprehensive package resulting in a range of benefits for the wider community. The reduced priority that is now given to the park & ride and the football stadium, are important factors in no longer allocating the site for development. However, it is also important that the revised development strategy no longer includes a role for this type of residential development site within the plan period. The emphasis has been clarified as being on previously-developed land first; then the two strategic development locations as large scale 'urban extension', and finally small scale greenfield sites which meet identified local needs. The potential scale of residential development in this location does not meet the latter category and it is not now considered appropriate or necessary to pursue the development within this area in the current plan period.

#### **AL11 – Land to the East of the A24, Horsham**

---

There were around 10 comments on this policy. There was some limited support for the development of this site. Those who commented felt it was a viable option but

wished to see measures in place to minimise the intrusion of traffic and road noise from the A24; improved bus and cycle links; and an assessment of safety issues related to any access onto Guildford Road. There was a comment that a courtyard style development may be the most appropriate and one respondent suggested an increase in the developable area.

There were also many concerns expressed over development of the site. It was suggested that the area was prone to flooding; development would lead to further traffic and congestion; there are noise implications and there were concerns and queries about access to the site. It was felt that development would harm the landscape and townscape character of the area; would lead to the coalescence of Broadbridge Heath and Horsham; would result in the loss of wildlife and trees; and it was felt that services and facilities in the area would not cope. Finally it was suggested that it was more sustainable to allocate larger areas; further urban sites may become available removing the need for this site; it is an isolated area and there was an objection to the demolition of a property on Farthings Hill.

**The Council will take these comments into account and will undertake further research on the issues raised in the responses prior to the preparation of the Submission Documentation. – FULL RESPONSE NEEDED (LG)**

#### **AL12 Land at Home Farm, Two Mile Ash Road, Barns Green**

---

Around 30 comments were received on this policy. Nearly all the respondents objected to all or part of the policy.

Whilst there was general support for the merging of the two schools, the proposals for housing were not supported. It was felt that the village is not a sustainable location for homes with limited employment and facilities. It was also stated that the development of housing would adversely affect the character of the village. The loss of playing fields was also a concern.

One issue of particular concern to respondents was the traffic. It was felt that in addition to the new housing resulting in increased traffic in the village, the location of the new school and housing on Two Mile Ash road will result in more road accidents and put school children and other road users such as horse riders at risk.

Concern was also raised about the potential for flooding on the Home Farm site and the adverse impact on wildlife.

**The Council will take these comments into account and will undertake further research on the issues raised in the responses prior to the preparation of the Submission Documentation. FULL RESPONSE NEEDED (LG)**

#### **AL13 – Land at The Plough, Lower Beeding**

---

Around 30 comments were received in relation to this site; approximately one-third were supportive of the development. Of those that supported the development, most wrote in having attended the exhibition and stated their preference for the third development option presented. It was considered that the proposals could help reduce the speed of traffic in the village and it was also requested that the development be progressed as soon as possible.

Many of the respondents who opposed the development submitted the same comments. These stated that the development would be too big for the size of the existing settlement, that local needs would not be met, that it would result in increased traffic and the loss of greenfield land. The remaining objectors considered that development in the village would not be sustainable due to its lack of services and facilities, and in some instances suggested alternative locations for development, some of which were in the Lower Beeding area.

**The Council will take these comments into account and will undertake further research on the issues raised in the responses prior to the preparation of the Submission Documentation. FULL RESPONSE NEEDED (LG)**

#### **AL14 – Land at Windacres Farm, Rudgwick**

---

The majority of around 25 comments received were objections. The main concerns were related to access, increased traffic, inadequate parking, lack of footpaths and problems with water and sewage supply.

There were queries as to the need for employment units in this location and the village as a whole, and concern about changes of use and the impact of noise. Suggested alternatives included a single storey office on site; relocation of warehouses to A281, the Loxwood Road, although there was also support for employment on the site.

Respondents felt that the site was unsuitable due to a lack of services, facilities, employment and poor public transport. It was an unsustainable village, only category 2, and it was felt there were more sustainable alternatives, including land in Sullington, Rudgwick and Barns Green. There was however some support for sheltered housing in the village but concern that the site is a distance from the facilities and isolated from the heart of the village, a number of concerns were also raised regarding the compatibility of sheltered housing with industrial units.

Other objections submitted included that development was on a greenfield site; development would put pressure on land to the east; would effect the conservation area; inadequate footpaths; was too high density; and that the structure and character of the village will be detrimentally affected. It was also commented that land owners and councillors need to be more open about long term visions for the village.

Changes suggested included a clear definition of extent and type of employment uses, additional highway improvements, access onto Church Street should be shown, retention of hedgerows, trees and enhanced screening. There were also suggestions to delete the site and spread dwellings over a number of small sites throughout the village.

**FULL RESPONSE NEEDED (LG)**

#### **AL15 – St Joseph's Abbey, Storrington**

---

The majority of around 37 comments were opposition to the allocation primarily on the grounds that it is contrary to a number of Core Policies; that it is not based on sound and credible evidence; that there is inadequate infrastructure provision; access and parking problems; narrow lanes and inadequate road network to cope with the increase in traffic. A number of respondents stated that residential



development is not suitable in this location because the site is in the conservation area and forms an important part of the village history. Features such as the stone wall should be retained. Other objections were raised in relation to insufficient local employment provision, no key worker housing or health care provision and that the allocation is contrary to the SA/SEA. A few respondents suggested that there are more sustainable sites available in other parts of the district.

The responses in support of the policy stated that the site is within easy walking distance of services, and the proposed parking provision would be of benefit to the area. It was also suggested that Church Street should be made a one-way system to ease congestion.

**There were considerable objections to this site. The Council has taken into account the representations received as well as further work carried out on the site; as a result St Josephs Abbey will remain identified in the Sites Specific Allocations of Land Submission Document for future development.**

**There have been considerable additions to the policy; it still specifies that high quality layout and design is required at this site which respects and enhances the character of the Storrington conservation area and setting of the Abbey, as well as specifying that car parking spaces for the use of St Mary's Church and the community to be provided. The section of the policy relating to a satisfactory access from Church Street to be agreed and provided remains; however, there is also additional wording about the consideration of possible traffic calming measures in Church Street.**

**The retention of the boundary walls and carved door were of particular concern; the policy therefore now specifies the retention of the stone boundary walls to Church Street and Browns Lane (other than where access is required) and the Moorish doorway into Browns Lane, with provision made for their long-term maintenance.**

**In order to aid integration of the development into the existing surroundings the policy now specifies that the open space provision is to be provided adjacent to the frontage with Church Street. This area can provide an attractive garden and help to retain the wildlife interest in the former Abbey garden area.**

**Further discussions with the water and sewage providers have not excluded the site from development, and contributions for services and facilities would be required from a developer. Another addition to the policy is in relation to the improvement of infrastructure, including the provision of more sustainable transport choices, services and community facilities, the policy specifying that contributions will be required unless it is demonstrated that the site or local circumstances do not justify such a provision, in accordance with Core Policies CP13 and CP20. The policy also separately specifies improvements to cycle and pedestrian links from the site.**

**Development of sheltered accommodation would add limited additional pressure on existing services and facilities, and with improved access to the centre of Storrington which is very close to the site, this site is considered a sustainable site for the proposed development.**

Out of the 10 comments received there were mostly objections but also some support for additional accommodation required by the RAFA home.

There was concern about urbanisation of the area and building on a greenfield site in a sensitive location which is seen to be inferior to other sites. It was felt to be in a prominent location effecting the landscape character and setting of Storrington.

There were some concerns about sewer and drainage capacity; increased traffic on the A283, and the sites location 250m from a former landfill site. One respondent felt that RAFA had sufficient properties already, another felt the existing site could be more intensively developed. It was also suggested that the allocation was not based on robust and credible evidence base and that other sites were more sustainable including land at Billingshurst.

**The Council has taken into account the representations received as well as further work carried out on the site, the RAFA site will therefore remain identified in the Sites Specific Allocations of Land Submission Document for future development.**

**It is recognised that this is a relatively prominent location to the entrance of Sullington, particularly given its position adjacent to an SSSI and with the views to and from the South Downs. The policy now specifies that sensitive design of the scheme, to reflect the site's relatively prominent location, is required. The policy also specifies additional boundary planting to the east of the site as well as the previously stated retention of existing mature hedgerows.**

**Further discussions with the water and sewage providers have not excluded the site from development, and contributions for services and facilities would be required from a developer. Another addition to the policy is in relation to the improvement of infrastructure, including the provision of more sustainable transport choices, services and community facilities, the policy specifying that contributions will be required unless it is demonstrated that the site or local circumstances do not justify such a provision, in accordance with Core Policies CP13 and CP20.**

**Development of sheltered accommodation would add limited additional pressure on existing services and facilities, located relatively close to the centre of Storrington, the site considered a sustainable site for the proposed development.**

#### **AL17 – Land at Summerfold, Rudgwick**

---

The majority of around 25 comments received were objections. The main concerns were related to access, increased traffic, inadequate parking, lack of footpaths, the cumulative effect of the two sites proposed in the village, and problems with water and sewage supply. It was commented that there are underwater springs that flow across the site so concerns about flooding. There were concerns that schools, doctors, dentists, shops, public transport, the electricity supply were unable to cope and that there was a lack of local employment.

There were concerns that the site is an unsustainable location and that alternative sites in Billingshurst, Sullington, Rudgwick and Barns Green were preferable. Other suggestions included reducing the density of development, building the homes on Parish Council owned land adjacent to Churchmans Meadow, or spreading them out across the village on small sites.

Other objections submitted included that development was on a greenfield site; would put pressure on land to the east; would effect the conservation area; inadequate footpaths; was is too high density; and that the structure and character of the village will be detrimentally affected.

Respondents felt that the oak boundary should be protected with Tree Preservation Orders, and there were objections due to the impact on neighbouring properties; the lack of a community benefits and the impact on the village community with homes built that are too expensive for families. There were varying opinions on whether development should be mixed or solely affordable housing.

Suggested amendments included highway improvements and a lay-by on the east side of Church Street, the protection of trees and hedges bordering Chuchmans Meadow; and that development must be in keeping with village.

**There were considerable objections to this site on varying issues. The Council has taken into account the representations received as well as further work carried out on the two Rudgwick sites identified in the Preferred Options Consultation Document, concluding that Summerfold will no longer be identified in the Sites Specific Allocations of Land Submission Document.**

**The need in Rudgwick is not considered of such a level as to justify both sites for housing development, considering other windfall development sites in the village. The partially previously developed site for mixed use at Windacres is considered more favourable than the greenfield Summerfold site. Access to Summerfold was however considered to be acceptable following the advice of West Sussex County Highways and Transport Department.**

**Further discussions with the water and sewage providers have not excluded the site from development, and contributions for services and facilities would be required from a developer if development were to take place. However, the local need for land in this location does not justify two sites of this scale of development being proposed in addition to windfall sites.**

**The play area linked with Churchmans Meadow was commented on as needing protection from development; this is already protected through a legal agreement attached to the planning permission, although the area was included in the built-up area boundary because it is related more to the village than the countryside.**

#### **AL18 – RMC Engineering Works, Washington**

---

Approximately 30 comments were received in regard to this policy. Most of these objected either totally or in part to the policy, with particular concern raised over the location of development. Many respondents stated that the site is not in a sustainable location due to its remoteness from services and facilities. It was suggested that there may be other sites which are more sustainable including Chantry Lane, Water Lane, and further afield at Billingshurst. Conversely, it was also suggested that the kennels adjoining the site could be incorporated as part of the development area.

There was some support for developing the site if it helped bring forward the Country Park, although a wish was also expressed for the land to be included in the Country Park without housing. The number of houses proposed for development was also

considered to be too high. Concern was raised over the distance from the site to the rest of Heath Common, and the fact that development would harm the surrounding landscape and environment. The potential for the development to impact on the nearby AONB was also highlighted. Finally, concern was raised about the possibility of contamination from nearby affecting the site.

Many respondents raised concerns about the potential access to the site. It was felt that residents of the development would be reliant on the car and that traffic and congestion would worsen as a result. It was also stated that access to the site needs to be improved prior to any development. A preference for access to come from the A283 was expressed.

The potential design of any development on the site was also commented upon. There was support for the principle of Ecohomes and in general it was felt that development needed to reflect the existing character and development density rather than being a more modern style, although this was preferred by some. It was also felt that it will be important for the trees and landscaping around the site to be retained, and for biodiversity to be enhanced.

**The Council has taken into account the representations received as well as further work carried out on the site, RMC site will therefore remain identified in the Sites Specific Allocations of Land Submission Document for future development.**

**This site as stated in the supporting text to the policy has a key role in facilitating the provision of the intended Sandgate Country Park, in response to the long term objectives for this area. Development will only occur if it secures the public use of land to the north of the site as part of this intended provision of a Country Park which, includes the sand workings to the west of the site. This site is effectively part of the Storrington built-up area, rather than Washington and is previously developed, albeit with restrictions on the use of the buildings. The wider aims stated are considered particularly to justify the development of the site for the benefits of the community.**

**Further areas of land in the vicinity were put forward to the Council; however, it is considered that it would not be applicable to include a wider area of land for development that is not directly linked with the sand working and therefore not facilitating the provision of the Country Park.**

**Regarding densities on the site, planning guidance requires the most efficient use of land, therefore higher densities are required now on development sites.**

**The policy still specifies the design and construction of homes must be to an eco-home standard; however, it now also specifies that the development of the site is subject to the provision of affordable housing in accordance with core policy CP12. The sensitive design and layout of the development is still specified in the policy to be an important consideration, additionally it makes reference to the sites location in relation to the AONB. The policy therefore now emphasises that the design of the scheme is to take into account adjoining uses.**

**It was considered by West Sussex County Highways and Transport Department that suitable access arrangements are obtainable at this site. The policy therefore specifies that access will be from Storrington Road (the A283), incorporating provision for a new junction with Hampers Lane.**

Another addition to the policy is in relation to the improvement of infrastructure, including the provision of more sustainable transport choices, services and community facilities, the policy specifying that contributions will be required unless it is demonstrated that the site or local circumstances do not justify such a provision, in accordance with Core Policies CP13 and CP20. An addition to the policy is the specification for the provision of a bus waiting facility to replace or enhance that already existing on the A283 adjoining the site.

The possibility of contamination at the site has been addressed in the policy, which now specifies that a comprehensive risk assessment of possible contamination and identification of remedial works will be required.

#### **AL19 – Parsonage Farm/St Peters Meadow, Henfield**

---

Fewer than 10 comments were received on this proposal, the majority objected. The main objections were that the allocation is not based on a robust and credible evidence base, that it fails to create a sustainable pattern of development and that it is not appropriate for the location and its infrastructure and service provisions. One respondent queried the phasing of the development while the two supporting responses wanted it to come forward earlier provided it is completed to the same standards as the earlier phases of development.

The Council has taken into account the representations received as well as further work carried out on the site, therefore Parsonage Farm/ St Peters Meadow Henfield will remain identified in the Sites Specific Allocations of Land Submission Document for future development. This general area of land has been previously allocated for housing, but did not come forward with the rest of the Parsonage Farm development.

The supporting text of the revised policy states that it is considered this scheme should be developed on a comprehensive basis in order to achieve the objectives of the policy. A development brief will need to be prepared to guide the appropriate implementation of the scheme. In light of these considerations, it is likely that the site will be unable to come forward for development until after 2011.

There has been an increase in the size of the site, the site now including land put forward to the council in the consultation period. The size of the site now approximately 6 hectares and expected to accommodate 90 homes in the period after 2011.

The policy specifies provision of affordable housing to meet local needs, in accordance with Core Policy CP4. The supporting text also states that the scheme will be built at a density that reflects the existing Parsonage Farm development, which was supported for its quality in the representations received. The effect on the character of the area is addressed in the policy, which still specifies that appropriate boundary landscaping and buffer planting on the northern and western boundaries, additionally the policy also specifies that an archaeological investigation will be undertaken before any development commences.

Another addition to the policy is in relation to the improvement of infrastructure, including the provision of more sustainable transport choices,

**services and community facilities, the policy specifying that contributions will be required unless it is demonstrated that the site or local circumstances do not justify such a provision, in accordance with Core Policies CP13 and CP20. Although not specifically stated in the policy a footpath for the school would be required along with an examination of the need for additional facilities.**

#### **Policy AL20 – Land at Millfield, Southwater**

---

There were around 25 comments, mainly objections. The majority of the concerns were in relation to traffic, pollution, the loss of light, loss of the green space, and concern about drainage. It is considered that there is no suitable access as the proposed access onto Mill Straight would be dangerous. The increased traffic and associated noise and exhaust pollution, as well as the loss of light from development and concerns that there are drainage problems of the site that may lead to subsidence were made. The loss of the greenfield damaging the semi-rural character of the area, and losing a habitat and buffer strip to the A24 was also a big concern.

Further concerns about the development were the effect on quality of life, design issues, overlooking and privacy issues, as well as concerns that the density is too high, the site is remote from the village; the infrastructure can't cope with further development. Respondents also stated that the site was considered unsuitable previously and the situation has not changed. It was expressed that the site conflicts with the sustainability objectives and indicators, and that the allocation is not based on a robust and credible evidence base, and other sites are more sustainable including land at Billingshurst.

A large number of people commented that the site should be removed; one respondent however supported the site and suggested that the site should not be a reserve site. Other changes to policy suggested improvements to the cycle/pedestrian route and a tree survey. There were other suggested uses for the site, including open space, a playing field, allotments or a nature conservation site. It was expressed however that if development were to occur the woodland should be retained, gardens for existing properties could be extended, and one respondent suggested the site would be most suitable for a mixed use scheme.

**There were considerable objections to this site on varying issues. The Council has taken into account the representations received as well as further work carried out on the site, as a result Millfield will no longer be identified in the Sites Specific Allocations of Land Submission Document. Further development of this scale at Southwater during this Local Development Framework plan period is not considered to be desirable or necessary at this time.**

**West Sussex County Highways and Transport Department advised that access was considered to be acceptable at this site. In addition had we progressed with the site existing woodland and hedgerows would have been required to be retained if development were to take place. Further discussions with the water and sewage providers have not excluded the site from development, and contributions for services and facilities would be required from a developer if development were to take place. However, impacts on neighbouring properties and the positioning of the site were concerns.**

#### **AL21 – Centre of Rural Excellence at Brinsbury**

---

Over 125 comments were submitted relating to this policy with the vast majority in opposition to the proposal for a new mushroom plant on the site. The main concerns related to the smell, increase in traffic, and health hazards generated by the mushroom factory. There were also concerns relating to the visual impact the proposal would have on the landscape and the effect it would have on house prices in the area. Some respondents also raised the issue that the mushroom factory is not agricultural and the introduction of industrial use on greenfield land would be a departure from adopted countryside policies. Other objections raised include; unsustainable location for industrial use, loss of grazing land, potential future housing development on site, impact on existing business and that the development would be of no benefit to the college. Proposed amendments include; an alternative site to be found for the mushroom factory on brownfield land. Some respondents supported the expansion of the college but objected to the mushroom factory. A limited number supported the inclusion of the mushroom factory arguing that it would be of benefit to the local area and that it would generate more employment opportunities.

## **RESPONSE NEEDED - LG**

### **AL22 – Shoreham Cement Works, Upper Beeding**

---

Fewer than 10 comments were received on this policy. There was no outright objection to the principle of some development on the site, but there were concerns about the policy wording and implications that may arise from the development.

It was felt that the site is not a sustainable location for housing, and that homes should be built elsewhere in the District. The impact of development of the site on traffic was raised as an issue, with the potential for congestion on the A283 and A27 raised. It was suggested that a traffic impact assessment be undertaken.

The sensitivity of site in landscape terms was also highlighted. The need for this to be taken into account was stressed, and there was also objection to the omission of the statement in UB1 that development should be of such a scale to bring about restoration of the site. There was also objection to the mention of waste proposals in the policy. The proposal for a development brief for the site was however supported.

**In response to the comments received on the proposals for Shoreham Cement works the policy has been rewritten. The policy now highlights the sensitivity of the site in landscape terms and states the requirement of the policy to bring about landscape restoration and be compatible with its location in an AONB. The reference to the potential for a facility for the collection and sorting of waste was however retained, as this ensures that the policy is compatible with the West Sussex Structure Plan 2001-2016.**

**In the responses to this policy it was stated that it was not thought that it would be appropriate to provide housing development of the site. It is agreed that 'general purpose' housing would not be appropriate on the site, as it is distant from services and facilities in Upper Beeding, Steyning or Shoreham, but there may be some employment or other uses on the site which require someone to live nearby. The possibility of limited housing being provided as part of the scheme has therefore been retained in the policy, but it is caveated to state that the housing must relate to the main use of the site.**

**The concern raised regarding the impact of traffic has been noted and the requirement for a Traffic Impact Assessment has been incorporated into the policy.**

#### **AL23 – Warnham and Wealden Brickworks, Horsham**

---

Five responses were submitted relating to this policy. Some concern was expressed about environmental impacts, traffic and visual intrusion. There was also support and a suggestion of expanding the site to incorporate the existing factory.

**The concerns raised relating to the impact any redevelopment would have on the locality and the wider landscape, and comments relating to transport issues are noted. The Council considers it important to ensure that any redevelopment of the site provides significant visual improvements and respects and enhances the overall environment of the site and the surrounding countryside. Development should also provide the necessary transport and infrastructure improvements, including exploring the potential for sustainable transport opportunities. The site specific policy requires any application for development to be accompanied by an Environmental Impact Assessment and should seek to maximise the potential for environmental enhancements in the area. The area of land included in Policy AL23 has been extended to include the existing factory, although the policy clearly states that the redevelopment proposals include the retention of the Warnham brick making factory.**

#### **AL24 – Land at Southwater – Proposed Secondary School**

---

Approximately 15 comments were received in connection with the proposed secondary school in Southwater, nearly all of these objected to the proposals. Many respondents felt that a school would not be necessary as school roles are currently falling. The loss of countryside and the livelihood of the farmer whose land would be lost to development were also concerns. The other major issue raised in response to this proposal was the impact of traffic arriving at the school and its effect on the local road network. It was suggested that a school built on the southern edge of the village would be more appropriate in this regard.

**The Council will take these comments into account and is awaiting further advice from the West Sussex County Council Education Department (see WSCC Rep?). We will undertake further research on the issues raised in the responses prior to the preparation of the Submission Documentation. FULL RESPONSE NEEDED (LG)**

### **Chapter 5 – Monitoring and Implementation Framework**

Fewer than 10 comments were submitted relating to this chapter. One respondent argued that the chapter fails to identify a suitable policy framework for the monitoring and review of the LDDs and that it does not provide a mechanism on how to maintain housing land supply. It was suggested that the housing monitoring exercise should focus on completions rather than supply. Other comments received included objections to the targets of Section 106 agreements; the use of conditions as an indicator of landscape character; the chapter not being strong enough on BREEAM/Eco-Homes and the lack of historic environment indicators. There was support to the journeys-to-work indicator and a request for biodiversity indicators to be included.



It was suggested that targets for Section 106 agreements should be based around securing a contribution in accordance with up to date Supplementary Guidance Documents based on for example an Open Space Strategy, a Playing Pitch Strategy or a Sports Facility Strategy. Another suggestion was to develop a new indicator for assessing landscape character by using information on type, amount and percentage of development granted planning permission in the two AONBs.

**The comments relating to proposed indicators are noted. An Annual Monitoring Report will be prepared to indicate the extent to which the core policies are being achieved and to identify any changes if a policy is not working or if the targets are not being met. The indicators as set out in the Core Strategy have been developed for the purpose of monitoring the strategy against the spatial objectives. An indicator on completion of new homes is included and, in addition, housing trajectories will be developed to show actual and projected dwelling completions on an annual basis. Infrastructure requirements will be monitored against number of schemes with Section 106 planning obligations/use of contributions made for infrastructure and open space improvements, details of which will be set out in a Supplementary Planning Document.**

**An indicator for assessing the landscape character by the type, amount and percentage of planning applications granted for new development in the two Areas of Outstanding Natural Beauty (AONBs) has been developed in order to maintain or reduce the current rates. Targets for improving the quality of new development now seeks to increase significantly the number of developments built to BREEAM/Ecohome standard.**

### **Inset Maps**

---

A number of site specific comments were made and some amendments to the built-up area boundaries were requested.

**Responses to the proposed built-up area boundaries are included in Annex 1.**

### **ANNEX 1: Built-up Area Boundary (BUAB) Suggested Amendments**

The following table shows the comments submitted regarding built-up area boundaries during the Preferred Options consultation period and the Councils response to those suggested changes.

<b>Site Name</b>	<b>BUAB Change</b>	<b>ID Number</b>	<b>Comment</b>
Oddstones, Pulborough	Addition to BUAB - <b>agree</b>	7	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference PL9. Considering this site again, it is concluded that the BUAB should be amended to go solely around the house and curtilage. Any development that does take place in this area must reflect its character and contribute to sustainable development objectives.
Greenfields Depot, Upper Beeding	Addition to BUAB – <b>agree.</b>	115	This site has been included in the Urban Housing Potential Study identified to be suitable for redevelopment to include affordable housing for local needs. The site received some local support. Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.UB1
Southwater - allotments to be removed.	Addition to BUAB - <b>agree</b>	121	Agree with Parish Council objection to the inclusion of the allotments. BUAB amended so consistent with exclusion of allotments in other areas.
Include disused pit area of Thakeham Tiles site	Addition to BUAB – disagree.	124	The site, although surrounded by development, has much tree cover and the majority of the site is more rural in nature than urban. The Council do not wish to encourage intensification of uses in this area. Taking into account the comments received in the Issues and Options consultation the area should remain outside the built-up area. Encouragement of development on this old pit area not desired, the hard standing areas to the north remaining included in the BUAB.
Land North and South of Forest Road.	Addition to BUAB - disagree	136	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.H1
Include Five Oaks in policy AL1 - should	Addition to BUAB - disagree	141	Unsustainable location with very limited services and facilities, the council would not wish to encourage further development here. Would perpetuate unsustainable travel

have a BUAB			patterns.
Kingsmead Close, Steyning	Addition to BUAB - disagree	141	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.BM1
Land west of Stane Street, Pulborough	Addition to BUAB - disagree	141	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.PL7
Gardens of New Road, Southwater	Addition to BUAB – disagree.	142	The Council does not wish to encourage significant development in this location, it is considered to be detrimental to the character of the area which is within the Strategic Gap. Not all previously developed land is suitable for development and it does not mean that it should be included within the built-up area boundary. It is considered that if development were proposed on these sites they should be determined under countryside policies, and the area remain outside the built-up area boundary.
Agree with amendments to Slinfold	Supports suggested change	149	Noted.
Land at Agates, Faygate and development to north	Addition to BUAB – disagree at this stage.	157	Most of this area is currently affected by planning application DC/05/1685 by Appleshaw Ltd for a continuing care retirement community. If such a proposal were considered suitable and takes place, then the built-up area boundary will need to be reconsidered and possibly amended in due course. In the mean time the site will remain outside of the BUAB. Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference. RS1
Oaklands Farm, Coolham (residential since 1926)	Addition to BUAB - <b>agree</b>	185	Only the dwelling curtilage has been suggested, therefore as this location is well connected with the village we agree to its inclusion in the BUAB.
Should extend BUAB's round future development sites	BUAB changes - <b>agree</b>	195	The Council are extending the BUAB's round identified allocations in the Local Development Framework.
West of Broadbridge Heath	Addition to BUAB - disagree	195	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.BB2

Object to inclusion site AL11 East of the A24 in BUAB.	Removal of amended BUAB - <b>agree</b>	197	The Council are extending the BUAB's round identified allocations in the Local Development Framework. The site AL11 for reasons set out is no longer identified, therefore the BUAB will remain as before.
Object to BUAB amendment as proximity to industrial estate - bunds between industrial estate and dwellings. Further development in area inappropriate.	Removal of amended BUAB - disagree	244	This is a logical BUAB when combined with the Industrial development to the south as well. Dwellings form part of the built entrance to Southwater, considered to be part of the village not the countryside. The three dwellings to the east of Worthing Road will remain in the BUAB. Any development that does take place in this area must reflect its character and contribute to sustainable development objectives.
3 areas at Christs Hospital - triangle by Christs Hospital Road and station road. Triangle at school approach. Stammerham and its curtilage.	Addition to BUAB – <b>agree to the addition of one section</b>	253	<p>It is considered that the triangle by Christs Hospital Road and station road is suitable to be included in the BUAB. The character of the site needs to be protected but relates sufficiently to the rest of the BUAB. Area to the north also included in the BUAB is protected open space with a legal S106 agreement associated with the recent development. The space is linked with the village not the countryside so within the BUAB of Christs Hospital.</p> <p>The council does not consider the triangle at school approach and Stammerham and its curtilage should be incorporated into the built-up area. They are distinctive in character from the existing areas of more dense development, the council not wanted to encourage development on these sites as would affect the character of Christs Hospital.</p>
Rear of Finches Lane West Chilton Common	Addition to BUAB - disagree	317	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.WC1
Supports retention of BUAB in Faygate	Supports suggested change	334	Noted.
Island Site, Billingshurst	Addition to BUAB - disagree	463	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.BL7

Dwellings on West side of St Georges Lane, Storrington	Addition to BUAB - disagree	483 & 571	Submitted as a BUAB change during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report Appendix A. Rural feel to road – considered unsuitable.
Luckista Park, Billingshurst Road, Ashington	Addition to BUAB - disagree	483	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.AS5
Supports deletion of area H from conservation area in Warnham	Supports suggested change	505	Noted.
Include Rookwood and nature reserve to protect like the Cricket Ground.	Addition to BUAB - disagree	508	The Nature reserve and golf course are rural in nature and important habitats, they are less related to the town in character than countryside. They are well protected through designations such as SNCI.
Land north of Broadbridge Heath	Addition to BUAB - disagree	533	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference. BB1
Delete amendments to Amberley BUAB - playing fields, church and castle.	Removal of amended BUAB - disagree	568	These areas are considered to be part of the village rather than the countryside, therefore remain within the proposed BUAB. This is consistent with the approach adopted across the District.
Delete amendments to the 2 additional area in Washington BUAB	Removal of amended BUAB - disagree	568	These areas are considered to be part of the village rather than the countryside, therefore remain within the proposed BUAB. This is consistent with the approach adopted across the District.
West Glebe Field, Pulborough. (Do not	Addition to BUAB - disagree	569	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.PL6

include cousins way recreation ground)			
Chanctonbury Nurseries, Ashington should be included in BUAB.	Addition to BUAB - disagree	588	Policy AL7 allocation for housing at Meiros farm will not be extended to include the full area of proposed change to the built-up area boundary or the additional land put forward in this representation. The council does not want to encourage further development in Ashington at this time, the village only suitable for small scale gradual growth. Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.AS7
Hayes Lane, Slinfold, BUAB amendment.	Addition to BUAB - <b>agree</b>	588	It is considered that this amendment to the BUAB is suitable, the only concern being the level of development on the site. The boundary is more logical than currently and precedent set by other development to north already. Area contains a large number of mature trees that are important to the character of the village and must be respected. Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report as part of reference.SF4
Land at Hill Farm Lane, Pulborough	Addition to BUAB - disagree	613	There are only three visible houses along this road in the centre of the proposed addition to the built-up area boundary. The road is a logical boundary to the built-up area, the council don't want to encourage sporadic development to the north of Hill Farm Lane, behind the houses or on the road frontage. This road being more of a rural than urban 'feel'. BUAB should remain as it is, not all built areas should or are in the boundary, there being no significant benefit to its addition. Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference PL3.
Built-up area round Hammonds next to AL9	Addition to BUAB – <b>agree</b>	782	Agree with this, a logical boundary to the settlement if in conjunction with allocation of land at Hammonds.
Railway Cottages, Pulborough	Removal of amended BUAB - disagree	841/1827	The Council consider these additional areas to be more related to the village than the countryside and therefore will remain within the BUAB. Any development that does take place in this area must reflect its character. It is not considered that pressure will be placed on adjacent land as not identified in the BUAB and further development to the west is not considered suitable.
Land North of London Road,	Addition to BUAB - disagree	963	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.CW1

Coldwaltham			
Land South of London Road, Coldwaltham	Addition to BUAB - disagree	963	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.CW1
Gerston Farm - limited extension to enable screening.	Addition to BUAB – disagree	988	The reason given is not a logical reason to extend the BUAB. Land does not need to be within the BUAB to allow planting and not considered suitable to allow further development in the countryside just to achieve further landscaping.
Built-up area should be moved to exclude land protected as open space at Churchmans Meadow Rudgwick.	Removal of amended BUAB - disagree	1039	This area is protected open space with a legal S106 agreement associated the recent development. The space is linked with the village not the countryside so remains within the BUAB of Rudgwick.
Amend boundary to include end of gardens on Worthing Road, Southwater	Addition to BUAB - disagree	1305	The Council does not wish to encourage significant development in this location, it is considered to be detrimental to the character of the area which is within the Strategic Gap. Not all previously developed land is suitable for development and it does not mean that it should be included within the built-up area boundary. It is considered that if development were proposed on these sites they should be determined under countryside policies, and the area remain outside the built-up area boundary.
Object to changes of BUAB on A281 north of Cowfold. Should remain the same.	Removal of amended BUAB – disagree	1446/ 1529/ 1413	This area should remain in the BUAB. The Old Vicarage and curtilage on the east side of the road is not included as this could detrimentally affect the character of the area if developed. The village begins where the sign for Cowfold is situated and it is thought that should sensitive development in this location occur respecting the planting of the area it would not be detrimental on the character and setting of the village.
West side of Kerves Lane, Horsham	Addition to BUAB - disagree	1541	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.H3
South Star Road, Partridge Green	Addition to BUAB - disagree	1546	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference.WG5

Dropping Holms, Henfield	Addition to BUAB - disagree	1657	Submitted as a site during the Issues and Options Consultation - considered unsuitable. See Issues and Options Report reference. HF6
Little Pytchley	Addition to BUAB – disagree	1749	It is not considered suitable for this piece of ground to be added to the BUAB due to its location and character being wooded and adjacent to a stream. Development in this location would be detrimental to the character of the area, current owners may not wish to develop, however intensification of uses on the whole site could be pursued which would be considered unsuitable. Can apply for change of use to garden even if outside BUAB, however this would also not be favourably looked upon as it could then lead to development.

## **ANNEX 2: Omissions Sites**

The following table shows the comments submitted regarding sites not included in the plan during the Preferred Options consultation period and the Councils response to the suggestions.