

PULBOROUGH PARISH COUNCIL

HORSHAM DISTRICT LOCAL DEVELOPMENT FRAMEWORK TO 2016

PRELIMINARY CONSULTATION: ISSUES AND OPTIONS

INTRODUCTION

Pulborough Parish Council welcomes the opportunity to comment on the Local Development Framework, congratulates Horsham District Council on a clear and comprehensive preliminary consultation document and thanks the District Council for consulting us.

It was particularly helpful to set out the context for the Consultative Document – although this sparked much debate. Both the Regional and Structure Plans fail to address the needs of rural communities and the Parish Council questions many of their conclusions, particularly the need for 190,000 square metres of additional employment floor space in Horsham given the existing quantity of vacant offices and shops.

Much of the Document is inevitably concerned with Horsham town centre and the surrounding areas. We have confined our comments to issues of general policy and specific issues for Pulborough. Our comments in respect of Pulborough reflect the Parish Council boundaries and include the 'settlements' of Codmore Hill, Marehill and Nutbourne and the surrounding rural areas.

ISSUE 1: Landscape Character Assessment

The Parish Council supports the need to protect and enhance the character of different landscapes and settlements in the District and welcomes the proposal to develop a new landscape policy.

ISSUE 2: Retaining Settlement Identity

We also support measures to prevent the coalescence of settlements. We are unable to comment on the efficacy of an alternative to local gaps in advance of sight of the proposed new landscape policy.

We support the maintenance of Strategic Gaps between Horsham and Crawley and Horsham and Southwater. The maintenance of the Gap between Horsham and Crawley is vital for the continued development of both towns. There are differences in outlook and expectation associated with each town which affect their characters. To merge into an amorphous blob of urbanisation would risk destroying essential differences.

ISSUE 3: Protection And Change

The Parish Council commends the intention to respect and enhance the distinctive local character of the land and the built environment in accommodating change.

Pulborough has a number of local features in need of protection from change. These include:

- our many footpaths and bridlepaths
- the shopping area of Lower Street which has a unique and historic character and should be designated as an area of special character and protected from the threat of residential development and significant change, eg the style of building and the current building line should be retained
- the river frontage which has already been defiled by a number of developments including Swan Corner, and needs to be protected from further development
- historic and scenic sites including old Swan Bridge and the East Glebe Field
- public open space including (again) the East Glebe Field
- Conservation Areas including Nutbourne
- Areas of Outstanding Natural Beauty proposed for inclusion in the South Downs National Park

We look to the District Council to define areas for protection and relevant policies in the Local Development Framework. In terms of policies, we would advocate the inclusion of the following current policies:

- Policy CS1 to safeguard the natural beauty and amenity of the countryside
- Policy EDC28 - limiting development to that which will preserve or enhance the character and appearance of Conservation Areas

ISSUE 4: The Rural Economy

The Parish Council supports the District Council's approach to addressing the needs of the rural economy whilst protecting the countryside. Pulborough is fortunate to retain a main line railway link to London and the coast. A dynamic approach is needed to avoid decline into a dormitory village.

We also agree that proposals for agricultural and other rural buildings and for farm diversification or equestrian development should be accompanied by a Business Plan to ensure the long term future of land and buildings. We would also like to see encouragement for rural enterprise schemes.

ISSUE 5: Major Rural Enterprise: relocation of Heveco Mushrooms Ltd

The Parish Council considers that the question of development needs and opportunities at Brinsbury College should be given special recognition in the Local Development Framework regardless of the decision in respect of Heveco Mushrooms. There are rumours of plans to move the equine centre to the main site, which would leave a large brownfield site available for development to the east of the main campus. Brinsbury College offers major opportunities for rural enterprise. There is also a vital need for improved recreational and transport facilities in relation to the campus.

ISSUE 6: Settlement Sustainability

1. Pulborough

The Parish Council agrees with the assessment of Pulborough as a settlement capable of sustaining some expansion, infill and redevelopment within the built-up area boundary.

2. Codmore Hill

For policy purposes we support the identification of Codmore Hill as a settlement with a more limited level of services. It is important that Codmore Hill should be identified as a separate settlement to avoid coalescence with the built-up area of Pulborough and to protect the intervening rural landscape.

3. Marehill and Nutbourne

For policy purposes we support the definition of Marehill and Nutbourne as villages/hamlets with few facilities and services and the conclusion that they are unsustainable locations for growth.

ISSUE 7: Infrastructure, Facilities and Services

The Parish Council shares the views expressed in the Consultative Document about the importance of developing the community and service infrastructure, and supports the principle that developers should contribute to the cost of providing additional facilities and services. We note that the District Council will determine the priorities and act as the co-ordinating authority for contributions. We would ask for a commitment from the District Council to consult Parish Councils and to heed their views. Past contributions have funded unwanted bus shelters in unsuitable locations or disappeared without trace into the County Council's budget for public transport.

We agree that each development proposal will have different specific requirements. We would suggest that each settlement will also have different needs or differences in emphasis. Our comments on the main priorities are as follows:

- Affordable housing should be primarily for local people, then essential workers. It should not be used as a mechanism for transferring problem families from towns to inappropriate rural locations. A major part of affordable housing provision should be retained on a shared ownership or rental basis so that it remains affordable.
- Other transport needs to focus on local needs. There are many public transport initiatives in Pulborough providing good access for various sections of the community. We need better timetabling and route planning between voluntary and commercial services rather than more public transport. We also need late running bus services, disabled access to the railway station and a footbridge to provide a safe crossing over the railway line.
- Open space, sport and recreation are a high priority in Pulborough. The range of formal leisure activities in Pulborough is narrow, our sports pavilion is crumbling and our main access to the new

facilities throughout the District is by private vehicle – not an option for many young people. Social facilities are important for all age groups in the village, including a place for young people to meet.

- Other infrastructure development. There is no reference in the Consultative Document to surface and wastewater drainage. Southern Water has admitted that Pulborough has insufficient drainage capacity. Any further significant development will demand an increase in drainage facilities.

ISSUE 8: Community, Leisure and Recreation and Tourism/Cultural Facilities

It is disappointing that the results of the study of open space, sport and recreation facilities in the District are not yet available. We agree that it is important to maintain and facilitate the improvement of existing facilities and to seek provision to meet needs. As noted earlier, Pulborough's facilities have not been enhanced or refashioned over the years and we do not enjoy 'good access' to provision elsewhere.

The Case for New Sports Facilities in Pulborough

Our response to the District Council's study drew attention to the inadequacy of sports facilities in Pulborough including:

- The very limited availability of indoor sports facilities in Pulborough
- The difficulty in accessing Chanctonbury Leisure Centre and the new swimming pool at Steyning by public transport at the popular times – evenings and weekends
- Overuse of our main recreation ground and the need for additional space
- the poor quality of the Cousins Way recreation field in terms of access, its slope, its irregular shape and the uneven ground
- An elderly and unattractive sports pavilion and changing rooms in need of major refurbishment
- The very poor level of activities for young people

Pulborough's Village Appraisal in 2000 drew particular attention to the demand from young people for a wider choice of activities, more places to meet, more access to sports facilities and better public transport. It also indicated a demand for more indoor sports activities and more social facilities for all age groups.

Pulborough Community Partnership's Action Plan, produced in 2003, identified the following priorities for action:

- Create new opportunities for sports activities with the provision of a new sports club (house)
- Extend, develop and improve leisure and recreational facilities for all

Proposed Action

The Parish Council seeks:

- To upgrade existing recreational facilities, particularly the sports pavilion, and to secure a modest expansion of the range of leisure activities
- To secure better public transport access at more appropriate times, ie evenings and weekends, to other facilities in the District

The Parish Council commissioned a maintenance survey of the existing sports pavilion in the autumn of 2003. Unfortunately, the survey indicated a need for considerable work on the building. The surveyors suggested that a pitched roof was needed over the rear of the building and that a major part of the pavilion, which is timber framed, was in poor condition and should be replaced.

The pavilion provides a much valued facility to several hundred people in Pulborough and is essential to our high quality sports activities. We should like ideally to take the opportunity of essential rebuilding to provide a modest expansion to accommodate much needed facilities for young people and possibly a fitness suite. We should also like to explore the possibility of including public conveniences.

The Parish Council has explored the various grant options for improvements to the pavilion without success and would ask the District Council to seek opportunities from development to help Pulborough to at least rebuild – and preferably extend - its sports pavilion. The estimated cost of the proposed improvements is £1.4 million.

It is possible that there may be a proposal from a developer to build 40 houses on the recreation field at Cousins Way with access and egress via Cousins Way. The developer has suggested that such a development could fund a new pavilion and the acquisition of alternative playing fields. If the developer approaches the District Council, the Parish Council would be interested in discussing this option as a possible way forward.

Tourism

We support the emphasis on tourism and share the view that there are opportunities to improve the tourism `product' of the District. We would have welcomed some commitment in the Document to support tourism initiatives throughout the District and not just in Horsham and the farming community. We would like to see encouragement for guided walks, picnic sites, bed and breakfast facilities and teashops in rural areas.

ISSUE 9: Larger Village Centres

It is perhaps inevitable that this Chapter of the Document is concerned primarily with Horsham town centre. However, the Parish Council has confined its comments to larger village centres.

We agree that it is essential that the centres of the larger villages continue to meet everyday retail needs and to ensure that their retail vitality and viability are not undermined. Pulborough urges firm resistance to inappropriate proposals, particularly for residential development within the village centre, and will support the principle of controls on the number of service uses within its centre.

Pulborough faces a particular challenge in terms of the agreed additional convenience shopping provision away from the current village centre. Whilst we welcome the agreed development, it also poses a potential threat to the existing retail centre. Pulborough Community Partnership has suggested that grants are needed for village shops. In addition, the Parish Council would like a study of retail opportunities in the centre to ensure the most effective deployment of the proposed enhancement measures.

ISSUE 10: Travel Demand and Transport

The Parish Council commends the intention to develop a transport strategy for the District. The development of a comprehensive traffic plan for Pulborough is a particular priority of Pulborough Community Partnership. We comment below on some of the proposals as they affect Pulborough.

1. Cycling and Walking

We are disappointed that there are no proposals about walking under this heading. There is little, if any, opportunity in Pulborough to develop safe cycle routes but there is an urgent need for safe pedestrian routes. We should like to see at least a commitment to supporting and encouraging safe pedestrian routes to schools.

2. Public Transport

We note the emphasis on interchange facilities and the needs of rail commuters. The problem of access to rail services for people with disabilities and mothers with pushchairs disabled persons/mother + buggy +toddler are still manifest throughout the area. In Pulborough it is still not possible for such people to access the up line - or the ladies toilets.

Bus services are also worthy of attention. Transport plans should consider the need for north/south links above east/west ones since all the major shopping towns lie north/south of the A283. The rail line serves north/south but the inadequacy of both public transport links to the station and parking facilities discourage rail journeys within the District.

3. Parking and Development

We are pleased that the Document recognises that the needs within rural areas will remain different from the more urban areas where alternative modes of transport are available. The Parish Council exhorts the District Council to permit the provision of parking in Pulborough in excess of District parking standards

because of the limited availability of public parking and alternative means of transport, and the potential environmental harm arising from parking demand being met elsewhere.

Adequate off street parking should be provided for new developments in rural areas by driveways, allocated parking for residents only (2 per dwelling) and visitor parking.

Off street parking provision should also be encouraged for existing dwellings. On street parking congestion in areas of Pulborough, such as The Spinney, Spinney North and Link Lane, has encouraged destructive parking on verges, obstructed pedestrian access and inhibited local transport movements through these streets. The parking on verges is widespread in other areas and has an adverse effect on the local environment.

4. Park and Ride

Pulborough Community Partnership has suggested that the District Council should consider the potential provision of a park and ride shopping and leisure service to Horsham and the coast. We believe that, subject to ample parking, such a scheme might encourage residents of Pulborough and neighbouring villages to make better use of both existing public transport and the facilities in towns.

5. Off Street Parking

We believe that Pulborough, as Storrington, is a special case. There is a general shortage of public parking space in Pulborough. On street parking in Lower Street, often in restricted parking areas, endangers pedestrians and causes an unacceptable level of congestion. People in wheelchairs and mothers with pushchairs are obliged to step into the road to negotiate parked cars, and delivery vehicles block the carriageway because parking bays are occupied. Commuters park in residential streets up to a mile from the rail station because of the inadequate supply and high cost of car parking facilities, and visitors block the emergency accesses to the library and the village hall.

Pulborough Community Partnership has identified the need for a parking needs survey. Pulborough needs a flexible policy towards parking with the options of additional off street parking and time restricted on street parking if these are shown to be necessary. Traffic wardens would also help.

5. Horsham as a Sub Regional Transport Hub

We agree with the suggestion that Horsham should be considered as a sub regional transport hub and that larger villages such as Pulborough could be designated as District transport hubs for the purpose of future sustainable transport investment.

ISSUE 11: Built-Up Area Boundaries

The Parish Council agrees that most of the required new development within the District should be concentrated in a relatively small number of large scale, mixed use, mixed density developments (Strategy Locations). The overall approach to defining built-up area boundaries is acceptable apart from proposed amendments to include parts of gardens in areas where development would not be sustainable.

Our comments on the specific changes proposed are as follows:

A and B: Codmore Hill

No objection, although we can see no particular reason for the change

C: Stane Street Close, Riverside Concrete, Sainsbury's etc

No objection. The Parish Council supports the development of the former Riverside Concrete site.

D: School Playing Field

Objection. The Parish Council is opposed to the inclusion of the school playing field within the built-up area. The playing field is integral to the village and need to be protected from development.

E: Land North of Glebelands

The Parish Council agrees with the proposal to delete this area from the built-up area. This greenfield site is unsuitable for development. It is inaccessible and subject to flooding. Any significant development would have an adverse effect on traffic conditions on an already congested road.

F: 159 Lower Street

Objection. The Parish Council can see no benefit and some risk in changing the boundary in an area considered unsuitable for development.

G: Rivermead

Objection. The Parish Council can see no benefit and some risk in changing the boundary to include parts of gardens abutting public open space.

H: Lower Street

Objection. As for G, the Parish Council can see no benefit and some risk in changing the boundary to include parts of gardens. In this case, the gardens are on the floodplain and form part of the attractive river frontage in Pulborough

ISSUE 12: Previously Developed Land (Urban Housing Potential)

The Parish Council generally concurs with the content of the Urban Housing Potential Consultation Paper, with the approach to previously developed land and with the intended response to the shortfall. Our comments on the proposed sites in Pulborough are as follows:

Land rear of Church House

We support in principle the proposed development of 10 houses subject to:

- A design and layout for the site which are sympathetic to the Conservation Area and which protect significant trees on the site
- A prohibition on direct access to the A29

Riverside Concrete

We support the development of Riverside Concrete for a mix of 115 small dwellings including affordable homes subject to:

- A prohibition on vehicle access to and from the south of the site
- A feasibility study for a footbridge over the railway to accommodate the increasing pedestrian traffic

We have identified a further site for consideration:

North Heath Garage Site

The Parish Council considers the site suitable for a small number of bungalows in keeping with neighbouring properties.

- ISSUE 13 Strategic Locations**
- ISSUE 14 West and/or South West of Horsham**
- ISSUE 15 Land North of Broadbridge Heath**
- ISSUE 16 New Secondary School at Southwater**

It would be inappropriate for Pulborough to seek to influence decisions about major initiatives which will have little direct impact on the village. We did have comments on proposals for West and/or South West of Horsham but assume that these will be revised now that a decision has been made about the possible University site.

Our primary direct concern is that there should be a co-ordinated traffic management plan to minimise congestion on the A29 for any major developments in the north of the District.

ISSUE 17 Smaller Scale `Greenfield' Site Allocations

Under normal circumstances the Parish Council is opposed to the development of green field sites. There are two possible exceptions in Pulborough where the potential benefits to the whole community might justify the otherwise unacceptable loss of open space:

West Glebe Field (off Church Place)

We would support a reasonable amount of controlled development on part of the West Glebe Field on two conditions:

1. that the East Glebe Field, south of Rectory Lane, is secured as public open space
2. that a study is undertaken – and the results implemented – into the feasibility of creating pedestrian and/or vehicle access via the station.

Under these conditions, development might be permitted for a church hall, a new Rectory, a car park for both Church users and commuters and some sheltered housing.

The exceptional circumstances influencing the Parish Council's view are the substantial benefits to the village in acquiring a new church hall, alleviating parking congestion in Church Place, creating additional parking facilities for the station and last, but not least, securing the East Glebe Field.

Cousins Way Recreation Field

As outlined under Issue 8, Community, Leisure and Recreation, we would be prepared to listen to proposals from developers for some sympathetic development if this enabled a significant improvement in the quality and range of sports and recreational facilities in Pulborough.

We are opposed to any development on the seven other sites identified in Pulborough. These are not required to meet identified local needs and are unsuitable on planning and/or environmental grounds. We have searched in vain for your reasons for excluding the sites and can only note local considerations:

Land at Oddstones, North of Stane Street Close

There have been attempts to describe this as a brownfield site: the majority of the site is agricultural land with a modest residential development in the north east corner. Apart from the lack of need for a development on the proposed scale, the site is outside the built-up settlement of Codmore Hill. It is unsustainable in terms of leisure, public transport and walking and cycling. In addition, the proposed vehicular access via Stane Street Close is unacceptable and the current road network will not sustain an additional 75 residential units in this area.

Land at Stopham Road

The Parish Council is opposed to the development of full cost housing on the old allotments site at Stopham Road. This is a green field site for which no need has been established.

Land North of Glebelands

The site is not needed and is outside the proposed built-up area boundary. More important, it is unsuitable in terms of access via the existing road network and the nature of the land and scale of the site would create unsustainable demands on existing drainage. It could not be contemplated without a massive investment in infrastructure development.

Land North of Glebelands (New Place Farm)

As above.

Land West of Stane Street

Apart from the lack of need for development on this site, it is outside the built-up area and would lead to the coalescence of the settlements of Codmore Hill and Pulborough. As with Oddstones, the existing road

network cannot sustain a major development at this site. Its development would demand a new major road west of the A29.

East Glebe, Lower Street

The Parish Council continues to support current Policy PL5. Indeed we aim that development should not be permitted (ie delete 'normally') and urge the District Council to continue its efforts to secure the site for public open space.

Land at Batts Lane, Mare Hill

Once again, this site is not needed, is outside the built-up area of Marehill and has poor access.

ISSUE 18 Affordable Housing

The Parish Council agrees with the proposed approach towards affordable housing and the mechanisms to ensure delivery. As noted earlier, we also expect the District Council to introduce mechanisms to ensure that such housing remains affordable. A recent housing needs survey in Pulborough by the Rural Housing Trust indicates that the majority of those in need require housing for rent as opposed to housing for shared ownership or for sale.

ISSUE 19: Traveller and Gypsy Accommodation

We agree in principle with the proposed approach to this issue but are surprised that there is no mention of the existing site at Adversane.

ISSUE 20: Employment Provision

We concur with the overall approach to business development and agree the definition of Station Approach Industrial Estate as an Employment Protection Zone.

Pulborough has a unique opportunity for economic development as the proposed Tesco and new medical centre developments should attract more employment to the village. There is also potential for growth in other areas such as the Colonnades and land immediately west of the railway. The latter would be subject to suitable access arrangements. We would ask that policies are sufficiently flexible to permit these developments.

We should also like to see encouragement for some employment within Pulborough's farmland and horticultural areas:

- Encouragement for rural enterprise schemes, (Blue Sky enterprises?), which make the best use of existing facilities and indeed expand them to provide more local employment.
- Controlled development at the site of the current equine centre at Brinsbury College.
- Encouragement for growth within Broomers Hill Industrial Park as well as the Station Approach Industrial Estate

The economy focus groups of the 4 towns partnership are important consultees here, since it is only through them that some grant monies will be available. The Parish Council would like to propose research together with Pulborough Community Partnership into the economic and commercial needs and opportunities of Pulborough and the options for development. (It is hoped that Section 106 funds might be used for a suitable project).

ISSUE 21: Improving the Quality of New Development

We agree that new development should enhance and complement the local character, landscape and open spaces and generally welcome the District Council's proactive approach to design. We hope to produce a Village Design Statement in the not too distant future. Whilst we appreciate the District Council's approach to mixed design, we do not require gables everywhere.

We support current policy EDC1 and hope that the final version of the Framework will contain similar provision. We are particularly concerned that new developments should not exceed the general height of the surrounding builds, nor interfere with the important views of other properties.

There is also a need to safeguard the build quality in terms of workmanship and basic materials for new development and ensure that the quality of affordable housing is commensurate with that of saleable properties. The recent debacle at Billingshurst suggests that building inspection needs to be improved. Are there enough building inspectors to adequately monitor the amount of development proposed?

OTHER ISSUES:

We appreciate that the Preliminary Consultation Document is of necessity fairly general. May we ask that the next final version should include some reference to the following:

- the need for development of the Toat Café site
- the eventual use of the Barnhouse Surgery site
- the eventual use of the site of the post office sorting office

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