

Pulborough Neighbourhood Plan

Site Assessment

Pulborough Parish Council

20th February 2019

Quality information

Prepared by	Checked by	Verified by	Approved by
Emily Pugh Senior Planner	Una McGaughrin Associate	Una McGaughrin Associate	Una McGaughrin Associate

Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1	20/02/19	Draft	EP	Emily Pugh	Senior Planner
V2	20/02/19	Draft Review	UM	Una McGaughrin	Associate
V3		Group Review			
V4		Proofread			
V5		Locality Review			

Distribution List

# Hard Copies	PDF Required	Association / Company Name

Prepared for:

Pulborough Parish Council

Prepared by:

Emily Pugh
Senior Planner
T: 020 7061 7826
E: emily.pugh@aecom.com

AECOM Infrastructure & Environment UK Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

© 20th February 2019 AECOM Infrastructure & Environment UK Limited. All Rights Reserved.

This document has been prepared by AECOM Infrastructure & Environment UK Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Disclaimer

This document is intended to aid the preparation of the Neighbourhood Development Plan (NDP), and can be used to guide decision making and as evidence to support NDP policies, if the Qualifying Body (QB) so chooses. It is not a neighbourhood plan policy document. It is a 'snapshot' in time and may become superseded by more recent information. The QB is not bound to accept its conclusions. If landowners or any other party can demonstrate that any of the evidence presented herein is inaccurate or out of date, such evidence can be presented to the QB at the consultation stage. Where evidence from elsewhere conflicts with this report, the QB should decide what policy position to take in the NDP and that judgement should be documented so that it can be defended at the Examination stage.

Table of Contents

1. Introduction.....	8
Background.....	8
Chronology of Support.....	9
2. Further Advice	9
General	9
Site Specific	10
3. Site Assessment Findings	15
Indicative Housing Capacity.....	17
4. Conclusions.....	18
Site Assessment Conclusions.....	18
Viability.....	18
Next Steps	18

Figures

Figure 1. Pulborough Neighbourhood Plan Area Boundary and the boundary of the South Downs National Park (Source: Horsham District Council).....	8
---	---

Tables

Table 1. Conclusions of the Site Assessment.....	15
Table 2. Indicative Housing Capacities: 'Green' Sites	17
Table 3. Indicative Housing Capacities: 'Amber' Sites.....	17

Abbreviations used in the report

Abbreviation

DEFRA	Department of the Environment, Food and Rural Affairs
DPD	Development Plan Document
Ha	Hectare
HCS	Horsham Core Strategy
HDC	Horsham District Council
HDPF	Horsham District Planning Framework
NA	Neighbourhood Area
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
MHCLG	Ministry of Housing, Communities and Local Government
PDL	Previously Developed Land
PPC	Pulborough Parish Council
PPG	Planning Policy Guidance (DCLG)
SDLP	South Downs Local Plan
SDNP	South Downs National Park
SDNPA	South Downs National Park Authority
SHELAA	Strategic Housing and Economic Land Availability Assessment

Executive Summary

Site selection and allocation is one of the most contentious aspects of planning, raising strong feelings amongst local people, landowners, developers and businesses. It is important that any selection process carried out is transparent, fair, robust and defensible and that the same criteria and thorough process is applied to each potential site. Equally important is the way in which the work is recorded and communicated to interested parties so the approach is transparent and defensible.

Pulborough Parish Council is in the process of preparing a Neighbourhood Plan for the parish of Pulborough which falls within the administrative areas of Horsham District Council and the South Downs National Park Authority. Therefore, the Neighbourhood Plan is being prepared in the context of the Horsham District Planning Framework for the parts of the Parish within the boundary of HDC and the Horsham Core Strategy and emerging South Downs Local Plan for the parts of the Parish within the boundary of the SDNP.

AECOM has provided assistance to Pulborough Parish Council since July 2018 in the form of a site visit and meeting, written support and a workshop. Pulborough Parish Council has revised their site assessment work following advice provided by AECOM. This report is in two parts: the first providing additional comments on the revised site assessment work (general advice and site specific advice) and the second part building on the work undertaken and the additional comments to provide advice on the emerging options for the future growth of Pulborough.

To assist Pulborough Parish Council AECOM has produced a suite of plans as a visual narrative of the journey that they have been through to get to where they are today. These are attached to this report as the following Appendices:

- Appendix H – context plan showing the Neighbourhood Area boundary and the built up area boundary.
- Appendix I – plan showing the Neighbourhood Area boundary, the built up area boundary and the boundaries of the known sites.
- Appendix J – plan showing the Neighbourhood Area boundary, the built up area boundary and the boundaries of the known sites as well as environmental constraints.
- Appendix K - plan showing the Neighbourhood Area boundary, the built up area boundary and the boundaries of the known sites as well as planning policy constraints.
- Appendix L - plan showing the Neighbourhood Area boundary, the built up area boundary and the boundaries of the known sites coloured in the RAG (red, amber, green) rating conclusion.

Of the 33 known sites, AECOM (building on the work undertaken by Pulborough Parish Council) has concluded that there are:

- three sites (PPNP07, PPNP08 and PPNP14) that show no or few constraints and are appropriate as site allocations, with an indicative development capacity of 12-13 dwellings;

- 15 sites that are potentially appropriate as site allocations, if identified issues can be resolved or mitigated, with an indicative development capacity of 836 to 899 dwellings; and
- 15 sites which are not appropriate as site allocations.

It would appear that the potentially suitable sites can be divided into the following groups: sites to the east of the A29 (sites 20, 21, 22 and 23), sites to the north and west of Glebelands (sites 9, 10 and 11) and other potentially suitable sites. These groupings have the following indicative capacities:

- East of the A29: 321 (“policy on” assumption) - 403 (landowner assumptions) dwellings;
- North and west of Glebelands: 194 (landowner assumptions) - 333 (“policy on” assumption) dwellings; and
- Other sites: 239 (landowner assumptions) to 245 (“policy on” assumption) dwellings.

Pulborough Parish Council has a housing target of 294 dwellings to be allocated in the Neighbourhood Development Plan; the assessment has revealed that the appropriate and potentially appropriate sites have an indicative capacity far in excess of the identified housing target.

The Parish Council are advised to consult with the community, Horsham District Council and other relevant statutory consultees (as appropriate) to determine which of the potentially suitable sites best meet the aims and objectives of the Neighbourhood Development Plan and should therefore be allocated for development.

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent review of the site appraisal work that Pulborough Parish Council (PPC) has produced in support of the Neighbourhood Plan for Pulborough. The work undertaken was agreed with the Steering Group and the Ministry of Housing, Communities and Local Government (MHCLG) in March 2018.
- 1.2 Pulborough Parish Council (PPC) is in the process of preparing a Neighbourhood Plan for the parish of Pulborough which falls within the administrative areas of Horsham District Council (HDC) and the South Downs National Park Authority (SDNPA), see Figure 1 below. The boundary of the Neighbourhood Area (NA) and PPC, as the qualifying body, were designated by HDC and the SDNPA in February 2014. Therefore, the Neighbourhood Plan is being prepared in the context of the Horsham District Planning Framework¹ (HDPF) for the parts of the Parish within the boundary of HDC and the Horsham Core Strategy² (HCS) and emerging South Downs Local Plan³ (SDLP) for the parts of the Parish within the boundary of the SDNP.

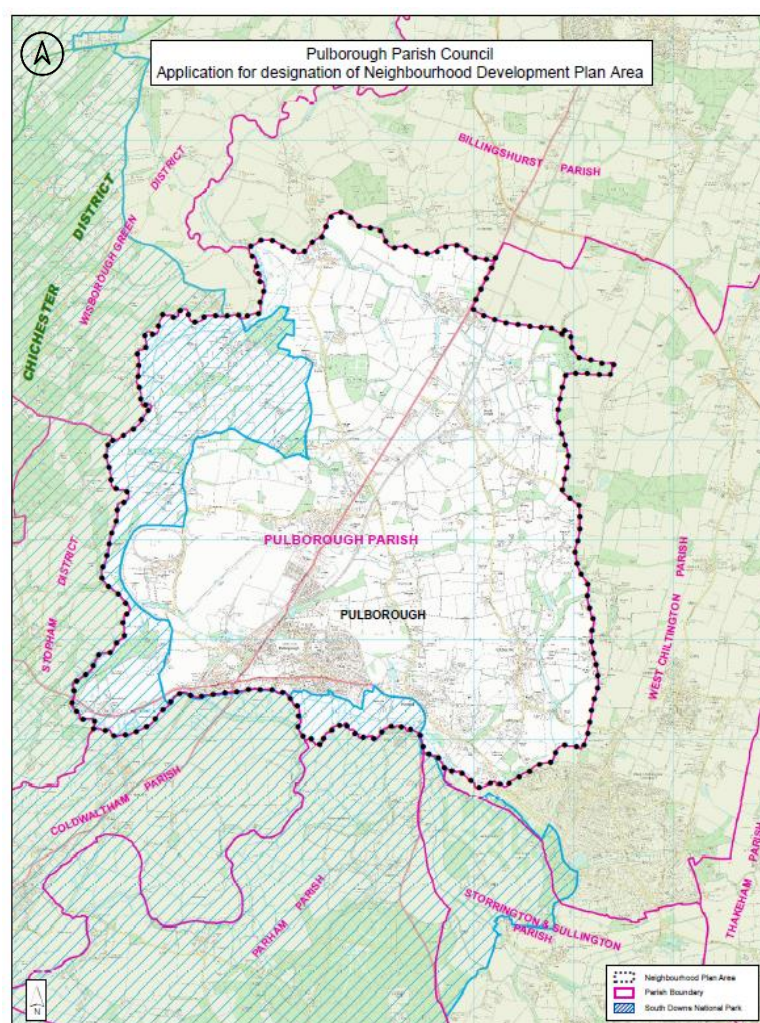


Figure 1. Pulborough Neighbourhood Plan Area Boundary and the boundary of the South Downs National Park (Source: Horsham District Council)

¹ Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

² Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0014/3470/Core_Strategy_2007_FINAL.pdf

³ Available at: <https://www.southdowns.gov.uk/planning/national-park-local-plan/>

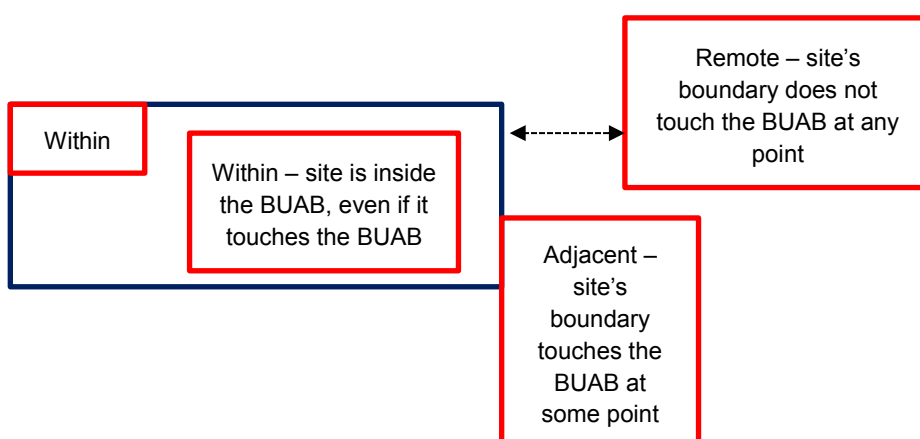
Chronology of Support

- 1.3 On Tuesday 3rd July 2018 AECOM visited Pulborough and met with members of the Steering Group. A walking tour of Pulborough including visits to many of the sites was carried out. A discussion was also held with the members of the Steering Group about the work undertaken to date, general feelings about the sites and any recent planning decisions (including any planning appeals) that may be relevant.
- 1.4 On the 10th July AECOM sent an email to PPC with comments in relation to HDC’s site assessment methodology (see Appendix A); PPC’s site assessment for site PPNP01 (see Appendix B) and PPC’s site summary for site PPNP01 (see Appendix C).
- 1.5 Between 10th July 2018 and Wednesday 22nd August 2018 AECOM reviewed the site assessments and site summaries produced by the Steering Group, providing comments akin to those shown in Appendix B and C, the Steering Group has received all of the comments provided.
- 1.6 On Wednesday 22nd August AECOM hosted a workshop in Pulborough with members of the Steering Group. At this workshop the comments provided by AECOM were discussed in length. AECOM’s comments can be grouped into two categories: general comments (about the interpretation or inclusion of specific criterion) and site specific comments (about site specific considerations and factors).
- 1.7 On the 23rd August 2018 AECOM provided copies of all of the material that was discussed at the workshop (i.e. comments presented as tracked changes and comments) to the Steering Group (see Appendix D).
- 1.8 On the 28th August 2018 AECOM provided notes of the workshop to the Steering Group (see Appendix E and F).
- 1.9 On the 10th December 2018 PPC provided AECOM with revised site assessments. AECOM’s previously provided advice has been incorporated to varying extents and further advice is provided below.

2. Further Advice

General

- 2.1 **Built up area boundary assessment** – see the diagram below to ensure the assessment of the BUAB criteria is considered consistently and correctly:



- 2.2 **Affordable housing** – add a caveat in the notes that says “on the assumption of a policy compliant scheme”. Some of the sites appear to have had a capacity of affordable housing calculated at a higher density (40 dwellings per hectare); what is the justification for this? In some instances it appears to have been assumed that the site would deliver 100% affordable housing rather than a policy compliant percentage of the overall mix; again what is the evidence for this? It is advised that PPC answer “yes” or

- “no” based on the requirements of HDC planning policy and do not try to estimate the how many affordable units would be delivered on the site.
- 2.3 **Able to provide a range of housing types** – add a caveat in the notes that says “on the assumption of a policy compliant scheme”.
- 2.4 **Distance to secondary school** – add a note that explains that the nearest secondary school is located in xxx and a bus service is in place to transport the children from Pulborough to the school. PPC are advised to measure the distance from the site to the nearest pick up point for the school bus.
- 2.5 **“Opportunity to provide xxx”** – it is recommended that these criterion are moved from the assessment of suitability and included with any conclusions. This is because these rows are too subjective and cannot be guaranteed at this stage. You cannot discount sites based on what they may (or may not) deliver. However, this information could be included in the summary (after the conclusion on whether site the site is suitable for allocation, as an aside).
- 2.6 **Protected Species** – it is advised that if there is a record of protected species then the colour rating for this criterion should be amber; as further investigation and mitigation may be required.
- 2.7 **“Views into...” and “views out of...”** – check that colour rating corresponds with Horsham’s Landscape Capacity Assessment Report, unless PPC has evidence to demonstrate otherwise.
- 2.8 **HDC’s Landscape Capacity Assessment Report** appears to be inconsistently referred to/interpreted. If sites fall within an area of this report it should be acknowledge on the site assessment and I would suggest that generally the colour rating of this report should be reflected in the site assessment unless the Parish Council have evidence to justify otherwise.
- 2.9 **Conservation Area** – it is advised that if a site is within a Conservation Area then the colour rating for this criterion should be amber, the same as Listed Buildings. A Conservation Area is not a show stopping constraint that would justify a red rating.

Site Specific

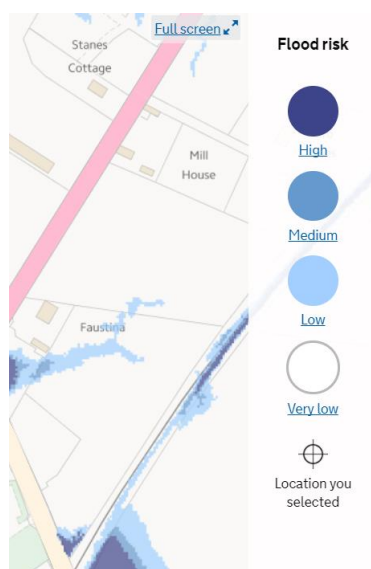
- 2.10 **PPNP01** – “relationship to designated local green space” it is advised that this criterion should be rated as amber if this field is not currently formally designated or red if it is currently formally designated as local green space. It is suggested that PPC remove the current comment and instead add a note explaining PPC’s intention to designate the site as a Local Green Space through a policy in the Neighbourhood Plan.
- 2.11 **PPNP02** – “access to highway” it is advised that this this criterion should be rated as red and a note is included that says that there is currently no vehicular access to site, to create suitable access the demolition of a listed wall. This is unlikely to be acceptable. If the site is not available then there should not be a timeframe for delivery (because the site is not available) – it is advised to remove 0-5 years.
- 2.12 **PPNP03** – “surface water flooding issues”. The site is a brownfield site; the actual extent of the high risk zone doesn’t extend to the current built form on the site. It is likely that mitigation would be possible and therefore the red colour rating is considered to be unjustified. It is advised that it would be more appropriate to rate this criterion as amber (or even green) and include the above comment. It is good to pick up the surface water flooding issues in the viability section.
- 2.13 **PPNP04** – query why “relationship to designated local green space” is amber. PPNP04 is not a locally designated greenspace. “Loss of employment site” – add a note to confirm that PPNP04 is an Employment Protection Zone (HDPF Policy DC19), revise colour rating to amber – whilst this is a constraint it is not insurmountable (given the appropriate evidence). It is advised that the comment in “Opportunity for employment” is amended to read: potential opportunity for mixed use development. Current comment about not on the site itself is a very complex, and not necessarily correct, statement to make in town planning terms. If the site is not available then there should not be a timeframe for delivery (because the site is not available) – it is advised to remove 5-15 years. If the site is not currently available then it should have a red rating (same as PPNP02); Neighbourhood Plan’s cannot allocate sites that are not deliverable.
- 2.14 **PPNP05** – I think the conclusion is possibly a bit strong here – the constraints facing this site are “typical” constraints facing a previously developed site; I think this site could be categorised as a green (it would be

- worth approaching HDC about the principle of changing the use of the site from employment to residential – to inform your final conclusion).
- 2.15 **PPNP06** – “loss of employment site” may be worth highlighting that the site is not an allocated employment site, amber rating is fine. Same comment as PPNP04 in relation to “Opportunity for employment”. Same comment as PPNP03 in relation to “surface water flooding issues”. As with PPNP05 I think the conclusion is possibly a bit strong here – the constraints facing this site are “typical” constraints facing a previously developed site; I think this site could be categorised as a green (it would be worth approaching HDC about the principle of changing the use of the site from employment to residential – to inform your final conclusion).
- 2.16 **PPNP07** – in the assessment of the provision of Affordable Housing it appears a higher density of development has been used (40 dwellings per hectare) what is the justification for this? It is advised the comment in the notes column is amended to read “there is potential to deliver affordable housing through a community land trust at this site”. In relation to “views into” and “views out of” the site does the railway provide any screening of the site from wider views – is there tall vegetation at this point? As with PPNP05, PPNP06 I think the conclusion is possibly a bit strong here – the constraints facing this site are “typical” constraints facing sites and I think this site could be categorised as a green.
- 2.17 **PPNP08** – I think the comment about potential to contribute to improvements to the railway bridge and the expectation of giving land to this project is optimistic/potentially unjustifiable (unless the landowner has indicated a willingness to do this).
- 2.18 **PPNP09** – “Access to highway” I would advise that this is rated amber rather than green given the comment in the notes column. The existing use of the site (i.e. agricultural/horticultural) is not classified as an employment use (i.e. a B class use), I would suggest including a comment in relation to “loss of employment” that explains this. How do the conclusions about landscape relate to Horsham’s published Landscape Capacity Study?
- 2.19 **PPNP10** – query whether “views into” the site should be rated amber? How do these conclusions relate to Horsham’s published Landscape Capacity Study? It is worth noting that the reasons for refusal of the recent planning application did not include any concerns about highways.
- 2.20 **PPNP11** - How does the Landscape conclusions relate to Horsham’s published Landscape Capacity Study? Should “views into” the site should be rated amber? The note about legal or ownership issues may be true but PPC are advised to examine the covenant themselves, or ask HDC to review, to ensure this statement is valid. May potentially need to update the viability row to highlight potential issues given this covenant. It is advised the comment in the notes column about affordable housing is amended to read “there is potential to deliver affordable housing through a community land trust at this site”.
- 2.21 **PPNP12** – “loss of employment site” may be worth highlighting that the site is not an allocated employment site, amber rating is fine. In terms of viability, the site is in an area at low risk of flooding with a low medium risk of surface water flooding. It is also previously developed land. We advise that it is unlikely that the mitigation measures that may be required would be so costly that it would impact viability. We advise that the impact on the BT exchange is not a planning matter. Does PPC have any viability evidence to support these comments? If the site is not available then there should not be a timeframe for delivery (because the site is not available) – it is advised to remove 0-5 years. The site is not developable if it is not available.
- 2.22 **PPNP13** – in the assessment of the provision of Affordable Housing it appears a higher density of development has been used (40 dwellings per hectare) what is the justification for this? Also the row for affordable housing says 108 when the other assessments have said yes or no. Conservation Area comment made in 1.8 applicable to this assessment. Does the Highways Authority support the comments made in relation to access and highways impacts? Use the same wording the conclusion as other amber sites for consistency.
- 2.23 **PPNP14** – “opportunity to provide... community facility” if planning permission has been approved for three homes the comment about a nursery is probably irrelevant, is there any reason to suspect that permitted development will not be delivered?
- 2.24 **PPNP15** – ‘Planning history’ – the planning application was refused by HDC and then a planning appeal was dismissed by the Planning Inspectorate; the application was not refused on appeal. “Will site

- generate significant additional traffic/congestion” has been answered no but coloured amber, if the answer is no surely it should be green? Four units are considered to be unlikely to generate significant highways problems – would the Highways Authority support this assertion?
- 2.25 **PPNP16** – conclusion could simply be “Site not available”.
- 2.26 **PPNP17** – why has “access to highway” been categorised as amber? Do your conclusions about landscape correspond with HDC’s Landscape Capacity Assessment Report in respect of this site? Conclusion could also mention access if this is still rated amber and landscape.
- 2.27 **PPNP18** – Landscape – the site is in area 40 of the HDC Landscape Capacity Assessment Report with no or low capacity for large scale housing development but PPC’s assessment of “views into” and “views out of” the site are rated green? Is there evidence to support PPC’s assessment? “Significant additional traffic” I don’t know if a red rating is justifiable, would suggest categorising as amber. Conclusion could also mention access if this is still rated amber and landscape.
- 2.28 **PPNP19** – Landscape – the site is in area 40 of the HDC Landscape Capacity Assessment Report with no or low capacity for large scale housing development but PPC’s assessment of “views into” and “views out of” the site are rated amber and there is a comment about development of the site being a significant incursion into the countryside. There is justification for “views into” and “views out of” the site to be categorised red.
- 2.29 **PPNP20** – in the assessment of the provision of Affordable Housing it appears a higher density of development has been used (40 dwellings per hectare) what is the justification for this? Also the row for affordable housing says 48 when the other assessments have said yes or no. I think the rating of amber for landscape is fair in this instance. However, it would be worth including a note that says HDC’s Landscape Capacity Assessment Report concludes the site has low or no capacity for housing growth, but the SHELAA notes that the site has a natural border which could reduce the site’s sensitivity to development. With respect to access the SHELAA raises concerns about access to the site; it is likely to require the demolition of the existing dwelling if the site is brought forwards in isolation. If the site is brought forwards in connection with PPNP21, PPNP22 and PPNP23 there is potential for access to be provided via another site (this would require collaboration between the landowners). On this basis I would suggest that the access row is re-categorised as amber rather than green. In the viability row it might be worth mentioning that the proximity to the railway line may limit development which may in turn impact viability.
- 2.30 In terms of conclusion PPC should be making their own, on the basis of their assessment, rather than rely on HDC’s SHEELA conclusion. I would advise that the site is re-categorised as amber with the main constraints being landscape, access and viability and a comment noting that the site has greater potential for allocation if brought forwards with PPNP21, PPNP22 and PPNP23.
- 2.31 **PPNP21** – I think the rating of amber for landscape is fair in this instance. However, it would be worth including a note that says HDC’s Landscape Capacity Assessment Report concludes the site has low or no capacity for housing growth, but the SHELAA notes that the site has a natural border which could reduce the site’s sensitivity to development. With respect to access the SHELAA raises concerns about access to the site; it is likely to require the demolition of the existing dwelling if the site is brought forwards in isolation. If the site is brought forwards in connection with PPNP20, PPNP22 and PPNP23 there is potential for access to be provided via another site (this would require collaboration between the landowners). On this basis I would suggest that the access row is re-categorised as amber rather than green. In the viability row it might be worth mentioning that the proximity to the railway line may limit development which may in turn impact viability.
- 2.32 As with PPNP20 PPC should be making their own conclusion, on the basis of their assessment, rather than rely on HDC’s SHEELA conclusion. I would advise that the site is re-categorised as amber with the main constraints being landscape, access, viability and proximity to Listed Buildings and a comment noting that the site has greater potential for allocation if brought forwards with PPNP20, PPNP22 and PPNP23.
- 2.33 **PPNP22** – It would be worth including a note that says HDC’s Landscape Capacity Assessment Report appears to conclude that the site is already committed for development but is adjacent to areas of low or no capacity for housing growth. In terms of access the site is likely to require the demolition of the existing dwelling/building if the site is brought forwards in isolation. However, if the site is brought forwards in

connection with PPNP20, PPNP21 and PPNP23 there is potential for access to be provided via another site (this would require collaboration between the landowners). On this basis I would suggest that the access row is re-categorised as amber rather than green. In the viability row it might be worth mentioning that the proximity to the railway line may limit development which may in turn impact viability.

- 2.34 **PPNP23** – I think the rating of amber for landscape is fair in this instance. However, it would be worth including a note that says HDC’s Landscape Capacity Assessment Report concludes the site has low or no capacity for housing growth. In the viability row it might be worth mentioning that the proximity to the railway line may limit development which may in turn impact viability.
- 2.35 The conclusion for PPNP23 currently refers to HDC’s SHEELA. However, this site was not submitted to the SHEELA. I would advise that the site is re-categorised as amber with the main constraints being landscape, traffic (?) and viability and proximity to Listed Buildings/potential for archaeology and a comment noting that the site has greater potential for allocation if brought forwards with PPNP20, PPNP22 and PPNP23.
- 2.36 **PPNP24** – The site is adjacent to the BUAB – rectify this in the relevant rows. I think the green fill in the rows relating to distance to community facilities and services is a bit misleading, would suggest removing the fill and leaving the cells white. It would be worth including a note that says HDC’s Landscape Capacity Assessment Report concludes the site has low or no capacity for employment growth – I would suggest re-categorising “views into…” and “views out of…” as amber. According to the EA’s Flood Map for planning the site is not at risk of flooding from rivers or the sea; re-categorise “Flood Zone” to green and amend current comment. According to the EA’s flood map parts of the site are at low risk of surface water flooding, and there is a strip of land at high risk of flooding. It is likely that issues of surface water flooding could be mitigated should the site be developed; suggest that this row is re-categorised as green.
- 2.37 **PPNP25** – Be consistent with the responses for PPNP24 and PPNP 25 – for example “able to accommodate affordable housing” says no for PPNP25 but N/A for PPNP24. I think the green fill in the rows relating to distance to community facilities and services is a bit misleading, would suggest removing the fill and leaving the cells white. It would be worth including a note that says HDC’s Landscape Capacity Assessment Report concludes the site has low to moderate capacity for employment growth – I would suggest re-categorising “views into…” and “views out of…” as amber. According to the EA’s flood map there is a strip of land across the site which is at low risk of surface water flooding and a very limited area at medium risk of surface water flooding. In the southern corner of the site there is a high risk of surface water flooding affecting a small area – see extract below. It is likely that issues of surface water flooding could be mitigated should the site be developed; suggest that this row is re-categorised as green. The risk of surface water flooding does not affect the majority of the site, the comment in the viability row is perhaps a bit over-zealous and it is suggested that this is removed.



- 2.38 It is recommended that the site is concluded as an amber site with the key constraints being remote from the built up area boundary and landscape (and surface water flood risk).

- 2.39 **PPNP26** – in the assessment of the provision of Affordable Housing it appears a higher density of development has been used (40 dwellings per hectare) what is the justification for this? Also the row for affordable housing says 61 when the other assessments have said yes or no. Suggest that this row is amended to read “Yes” with a note in the comments that says “on the assumption of a policy compliant scheme”. It would be worth including a note that says HDC’s Landscape Capacity Assessment Report concludes the site has low to moderate capacity for housing growth – I would suggest re-categorising “views into...” and “views out of...” as amber. “Significant additional traffic” I don’t know if a red rating is justifiable (would the Local Highways Authority support this position), would suggest categorising as amber.
- 2.40 **PPNP27** – in the assessment of the provision of Affordable Housing it appears a higher density of development has been used (40 dwellings per hectare) what is the justification for this? Also the row for affordable housing says 66 when the other assessments have said yes or no. Suggest that this row is amended to read “Yes” with a note in the comments that says “on the assumption of a policy compliant scheme”. It would be worth including a note that says HDC’s Landscape Capacity Assessment Report concludes the site falls within two character areas (43 with low to moderate capacity for housing growth and 48 with no-low capacity for housing growth) – I would suggest re-categorising “views into...” and “views out of...” as red, or amber (if the development is kept to the eastern part of the site) as a minimum. I don’t know if a red rating is justifiable (would the Local Highways Authority support this position), would suggest categorising as amber.
- 2.41 **PPNP28** – I don’t know if a red rating is justifiable in relation to “site generate significant additional traffic/congestion” (would the Local Highways Authority support this position), would suggest categorising as amber.
- 2.42 **PPNP29** – No comments.
- 2.43 **PPNP30** – I don’t know if a red rating is justifiable in relation to “site generate significant additional traffic/congestion” (would the Local Highways Authority support this position), would suggest categorising as amber.
- 2.44 **PPNP31** – in the assessment of the provision of Affordable Housing it appears a higher density of development has been used (40 dwellings per hectare) what is the justification for this? In terms of access if the existing dwelling needs to be demolished to facilitate an acceptable access for four or more dwellings it would be worth including a note to this effect. With reference to “site generate significant additional traffic/congestion” I don’t think a red rating is justifiable (would the Local Highways Authority support this position), would suggest categorising as amber.
- 2.45 **PPNP32** – Should “distance to public transport” be green if the nearest bus stop is 0.8km away?
- 2.46 **PPNP33** – If there are two sites these should be assessed individually; only one red line boundary has been shared with AECOM. Should “distance to public transport” be amber if the nearest bus stop is 1km away? If the site is not at risk of surface water flooding then it should be categorised as green. If it is unclear whether the site is available or there are doubts about availability then it would be advisable to rate the site as red because there are doubts about its availability.

3. Site Assessment Findings

- 3.1 In light of the comments made above AECOM has proposed amendments to some of the conclusions reached by Pulborough Parish Council, these are identified by the use of **bold text** in Table 1 below. AECOM's conclusions and RAG rating reflect whether the site is appropriate for allocation in the NDP.
- 3.2 AECOM has also identified key constraints impacting each site and these have been set out in Table 1 below.
- 3.3 Traffic has been included as a constraint in a number of instances. However, where it is followed by a “?” it is because it is not possible, at this stage, to establish whether it as an absolute or insurmountable constraint (in line with the comments made in the previous section).
- 3.4 Table 1 details which sites could be appropriate for allocation in the Pulborough Neighbourhood Plan (i.e. those sites rated green or amber). Sites whose conclusion is ‘green’ are sites that show no or few constraints and are appropriate as site allocations. Sites whose conclusion is ‘amber’ are sites which are potentially suitable if identified issues can be resolved or mitigated. Sites whose conclusion is ‘red’ are sites which are not currently suitable. The judgement on each site is based on the three ‘tests’ of whether a site is appropriate for allocation: that the site is **suitable, available** and **achievable**.
- 3.5 To complement Table 1 below a map has been produced that shows each site with a colour-coded boundary corresponding to AECOM's RAG rating, please see Appendix L.

Table 1. Conclusions of the Site Assessment

Site reference	PPC RAG Rating	AECOM RAG Rating	Key Constraints
PPNP01			Heritage (in a Conservation Area and proximity to Listed Buildings, potential for archaeology), constrained access and presence of protected species, potential local green space
PPNP02			Site is not available
PPNP03			Heritage (adjacent to a Conservation Area, potential for archaeology), surface water flooding
PPNP04			Site is not available
PPNP05			Heritage (adjacent to a Conservation Area), traffic?, loss of employment (not a designated employment site), potential contamination
PPNP06			Tree Preservation Order, heritage (potential for archaeology), loss of employment, surface water flooding, potential contamination
PPNP07			Tree Preservation Order, heritage (potential for archaeology)
PPNP08			
PPNP09			Landscape, heritage (proximity to Listed Buildings, potential for archaeology), highways, surface water flooding
PPNP10			Landscape, heritage (potential for archaeology), highways? (note that previous planning permission was not refused on highways grounds)
PPNP11			Landscape, highways, viability
PPNP12			Site is not available
PPNP13			Heritage (in a Conservation Area and proximity to Listed Buildings, potential for archaeology), constrained access, landscape and presence of protected species, potential local green space
<i>PPNP14</i>			<i>Site already has planning permission</i>
PPNP15			Access
PPNP16			Site is not available
PPNP17			Landscape, heritage (potential for archaeology), highways, sewerage and drainage
PPNP18			Landscape, heritage (proximity to Listed Buildings, potential for archaeology), highways, sewerage and drainage

Site reference	PPC RAG Rating	AECOM RAG Rating	Key Constraints
PPNP19			Landscape, access, sewerage and drainage
PPNP20			Landscape, access and viability, sewerage and drainage
PPNP21			Landscape, access, viability and heritage (proximity to Listed Buildings), sewerage and drainage
PPNP22			Landscape, access, viability, heritage (potential for archaeology), sewerage and drainage
PPNP23			Landscape, traffic(?), viability, heritage (proximity to Listed Buildings, potential for archaeology), sewerage and drainage
PPNP24			Landscape (and surface water flooding)
PPNP25			Remote from the built up area boundary and landscape (and surface water flooding).
PPNP26			Remote from the built up area boundary, distance from community facilities and services, landscape and settlement pattern, heritage, traffic, sewerage and drainage.
PPNP27			Remote from the built up area boundary, distance from community facilities and services, landscape and settlement pattern, heritage, traffic, sewerage and drainage
PPNP28			Remote from the built up area boundary and distance from community facilities and services
PPNP29			Site is not available
PPNP30			Remote from the built up area boundary, distance from community facilities and services, traffic?
PPNP31			Remote from the built up area boundary, distance from community facilities and services, access, traffic?, trees
PPNP32			Site is not available
PPNP33			Doubts about site's availability

Indicative Housing Capacity

3.6 Indicative housing capacities; that is, the optimal number of new homes that could be provided on each site, for each site considered suitable and available have been established by Pulborough Parish Council in the following ways:

- Where a site promoter has provided any development figures, e.g. through a masterplan or through information submitted to Pulborough Parish Council; and
- By applying a gross to net developable area assumption to the site area and multiplying the net developable area by an assumption of 30 dwellings per hectare.

3.7 The calculation of indicative housing capacities is the starting point of conversations with the landowners/site promoters and Horsham District Council; they may be revised up or down following these conversations and detailed design work.

3.8 Table 2 below sets out the potential number of units that could be provided on 'green' sites.

Table 2. Indicative Housing Capacities: 'Green' Sites

Site reference	Landowner assumption	"Policy on" assumption
PPNP07	9	8
PPNP08	1	1
PPNP14	3	3
Total Indicative Housing Capacity	13	12

Source: Information provided by Pulborough Parish Council

3.9 Table 3 below sets out the potential number of units that could be provided on 'amber' sites.

Table 3. Indicative Housing Capacities: 'Amber' Sites

Site reference	Landowner assumption	"Policy on" assumption
PPNP01	8	46
PPNP03	Not provided	4
PPNP05	27	8
PPNP06	39	31
PPNP09	100	206
PPNP10	73	110
PPNP11	21	17
PPNP13	72	81
PPNP15	4	4
PPNP17	25	26
PPNP18	60	45
PPNP20	31	36
PPNP21	6	11
PPNP22	75	56
PPNP23	291	218
Total Indicative Housing Capacity	836 (including 4 for PPNP03)	899

Source: Information provided by Pulborough Parish Council

4. Conclusions

Site Assessment Conclusions

- 4.1 Pulborough Parish Council has a housing target of 294 dwellings to be allocated in their Neighbourhood Development Plan. The site assessment has concluded that there are three sites that show no or few constraints and are appropriate as site allocations, with an indicative development capacity of 12-13 dwellings.
- 4.2 If the Parish Council, in consultation with the community, Horsham District Council and other relevant statutory consultees (as appropriate) decided to allocate these sites for the number of units indicated there would be a remaining housing target for the Neighbourhood Plan of 282 dwellings.
- 4.3 The site assessment has concluded that there are 15 sites that are potentially suitable if identified issues can be resolved or mitigated, with an indicative development capacity of 836 to 899 dwellings, in excess of the identified housing target.
- 4.4 As with above the Parish Council are advised to consult with the community, Horsham District Council and other relevant statutory consultees (as appropriate) to determine which of the potentially suitable sites best meet the aims and objectives of the Neighbourhood Development Plan and should therefore be allocated for development.
- 4.5 It would appear that the potentially suitable sites can be divided into the following groups: sites to the east of the A29 (sites 20, 21, 22 and 23), sites to the north and west of Glebelands (sites 9, 10 and 11) and other potentially suitable sites. These groupings have the following indicative capacities:
 - East of the A29: 321 (“policy on” assumption) - 403 (landowner assumptions) dwellings;
 - North and west of Glebelands: 194 (landowner assumptions) - 333 (“policy on” assumption) dwellings; and
 - Other sites: 239 (landowner assumptions) to 245 (“policy on” assumption) dwellings.

Viability

- 4.6 As part of the site selection process, it is recommended that the PPC discusses site viability with HDC. Viability appraisals for individual sites may already exist. If not, it is possible to use the Council’s existing viability evidence (such as an “Affordable Housing Viability Assessment” or “Whole Plan Viability Study”) to test the viability of sites proposed for allocation in the NDP. This can be done by ‘matching’ site typologies used in existing reports, with sites proposed by the Steering Group to give an indication of whether a site is viable for development and therefore likely to be delivered. In addition, any landowner or developer promoting a site for development should be contacted to request evidence of viability.

Next Steps

- 4.7 This report can be used by PPC to guide decision making on site selection and to use as evidence to support site allocations in the NDP if they choose to do so. It is strongly advised that PPC discuss potential site allocations with HDC and the Local Highways Authority in order to establish whether proposed site(s) would be acceptable.

