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District
Council**

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SOUTH DOWNS NATIONAL PARK RE-OPENED PUBLIC INQUIRY

**WRITTEN REPRESENTATION BY HORSHAM DISTRICT
COUNCIL**

TOPIC 4 – ADDITIONAL LAND

January 2008



1. Introduction

- 1.1 Horsham District Council (HDC) submitted representations both at the original Inquiry hearings and during the Further Matters consultation period which ran from 2nd July to 24th September 2007. HDC did not (and still does not) dispute the principle of the South Downs National Park designation, but submitted more detailed representations on matters 1, 2, 3 and 4 (Additions 5 & 7). We also took the opportunity to voice our support of proposed deletions 3, 4 and 5 to the boundary of the PSDNP within Horsham District. We felt, and still do, that this approach is more consistent with the relevant guidance and more appropriate 'on the ground'.
- 1.2 The Council does not wish to add further to the representations submitted to the original Inquiry hearings or the Further Matters consultation period on matters 1, 2 and 3.

2. Addition 5

- 2.1 Since the submission of our Further Matters representations and the subsequent re-opening of the public inquiry, The Council's Site Specific Allocations of Land DPD (SSAL) has been adopted. Due to the changes made in the Inspectors' binding report, there has been an alteration from the Council's submission allocation to the Council's adopted allocation regarding the RMC site in Washington.
- 2.2 This site is included within the area known as Addition 5 in the recommended boundary modifications of June 2007. The Council wishes to take this opportunity to update the Inspector of the policy situation in regard to this particular area.
- 2.3 Whilst the RMC site (previously AL 6 in the submission SSAL, please see Map I) was removed as an allocation in the adopted Site Specific Allocations of Land (2007) document, there is still an allocation in place for half of the site under Policy AL 19 which allocates Sandgate Park as a Country Park. Please see Appendix I, which is a copy of the adopted supporting text and policy.
- 2.4 As the Proposals Map extract (in Map II) shows, the area within Addition 5, formerly included as allocation AL6 but not designated to be a Country Park, comprises of old engineering works which used to relate to the sand working operations. There is also an electrical sub-station, residential properties and dog kennels within the area. Indeed, in their report into the SSAL the Inspectors' identified the majority of the AL 6 site as PDL, due to the mineral extraction and associated development.
- 2.5 As set out in the Further Matters representations, Horsham District Council maintains the principle of the position set out in its representations to the original Inquiry (see representations 2552/1/1, 2552/1/2, 2552/1/3, 2552/1/3a, 2552/1/3b, 2552/1/3c, 2552/1/4, 2552/1/4a, 2552/1/4b and 2552/1/4c). This, in essence, is that the Proposed South Downs National Park (PSDNP) should not extend to the north of the

A283. This is a position which is shared by the Environment Agency, for the reasons encapsulated in the Agency's Response in paragraphs 7.236 - 7.239 of the Inspector's Report.

- 2.6 The Council considers that where the area AL19 overlaps with that identified as Addition 5, the designation of a National Park would prejudice the longer-term delivery of the County Park identified in AL19.

3. Addition 7

- 3.1 The Council does not support the proposed Addition 7 and maintains the position set out in its representations to the previous Inquiry hearings. The work undertaken by the Council and submitted to that Inquiry supports the approach that the boundary

should abut the southern side of Edburton Road. However, in the case of this particular addition, the Council considers that the appropriate course of action is for DEFRA / Natural England to make the judgement in the light of the Inspector's conclusions.

4. Conclusion

- 3.1 In essence, the Council's position in relation to Addition 5 remains that the Proposed South Downs National Park (PSDNP) should not extend to the north of the A283. The purpose of this written representation is to update the Inspector on the position regarding the HDC allocations within Addition 5.
- 3.2 It is still the opinion of the Council that proposed Addition 5 would not have due regard to Site Specific Allocations of Land DPD, and would therefore be contrary to the five principles set out in approach to boundary definition. Because of this, and because the area identified, along with the adjoining Kennels and other properties, clearly relates more to the sandpit area, the Council does not support its inclusion in Addition 5. A further amended boundary is, therefore, proposed whereby if the area to the north of the A283 is included then the area designated as Country Park under policy AL19 of the SSAL and the RMC works area is excluded.
- 3.3 As discussed in paragraph 2.6, the work undertaken by the Council and submitted to that Inquiry supports the approach that the boundary should abut the southern side of Edburton Road. However, in the case of this particular addition (addition 7), the Council considers that the appropriate course of action is for DEFRA / Natural England to make the judgement in the light of the Inspector's conclusions.
- 3.4 The Council did not (and still does not) dispute the principle of the South Downs National Park designation. The Council considers that the inclusion of the proposed Additions 5 and 7 would not be appropriate for the reasons set out in this represent. We felt, and still do, that these areas should be excluded and that this approach is more consistent with the relevant guidance and more appropriate 'on the ground'.

Extract from Horsham District's Adopted Site Specific Allocations of Land DPD

Sandgate Park, Sullington

3.62 Sand extraction at Sandgate Park is likely to continue well beyond the current plan period to 2018. However, in the light of the potential of this overall area to make a valuable contribution to a variety of recreational facilities a feasibility study was prepared by Land Use Consultants (2000) on behalf of the Council. The study concluded that the concept of the Country Park was both valid and achievable. The study also highlighted the potential for an early phased introduction of the Country Park; the Council will seek to utilise any opportunities to work towards this objective, including through agreeing a timescale for progressing the elements identified and negotiating public access to the restored parts of the site in advance of the final cessation of the sand workings.

3.63 Sullington Warren is an SSSI and therefore this status should be respected in any country park proposal. It is therefore suggested that the public use of the Warren should continue to be restricted to informal recreation through the use of the footpaths.

3.64 Similarly, the area of mixed woodland, covering approximately 12 hectares that has been actively managed by the Council since 1987, should be protected and enhanced in any future country park strategy. Within this area Countryside Wardens in the Leisure Services Department of the Council have worked closely with the Sandgate Conservation Society in an effort to enhance the amenity and woodland interest of the area. A management plan has been prepared for the site which sets out long term proposals to ensure that the various habitats are safeguarded and enhanced. Such proposals should be incorporated within a Supplementary Planning Document 'planning brief' for the overall Country Park, which the Council would expect to prepare for the area in the longer term, once the basis for moving forward with the implementation of the Country Park is clearer.

3.65 There is scope to create a variety of formal and informal recreation uses following sand extraction at Sandgate Park between Water Lane and Hampers Lane. The grading and landscaping process with respect to lagoons in the east of the site has already begun. These areas could be used for informal recreational purposes as well as fishing and water sports such as windsurfing. There is a need for small campsites for "backpackers" within easy reach of the South Downs Way and also a hostel or "bunkhouse" accommodation, providing simple dormitory and self-catering facilities. It is considered that Sandgate Park could provide such facilities given its proximity to the South Downs Way, just half a mile away. Sandgate Park could also be a suitable location for additional active sports provisions such as football pitches.

3.66 Angels Sandpit could be incorporated within a Country Park. The site is currently being used for the tipping of inert material in the pit. This will reduce its steep sides and make public access possible.

3.67 The former pit east of Hampers Lane has been restored and planted with trees. Policy AL19 allocates this land for public use as part of the provision of a Country Park at Sandgate. This part of the Park could also be used for informal recreational use and would provide a useful link between the Country Park and the Washington Common National Trust land to the east.

3.68 In general terms, this area has great potential to become a real asset in the Storrington area in terms of its informal and active recreation and small scale tourist use potential. Although sand extraction may continue for many years yet, and probably beyond the plan period, it is essential that the proposed future Country Park use is not prejudiced by development proposals that inhibit its implementation and that provision is made to encourage proposals that could assist in creating a Country Park as soon as it is practicable to do so.

POLICY AL 19

Sandgate Park, Sullington

The Council will seek to secure the Sandgate Park area, as shown on the Proposals Map, for the formation of a Country Park as soon as it is practical to do so, taking into account the requirements for mineral extraction. Proposals that could assist in the formation of the country park will be encouraged. Development proposals not directly associated with mineral extraction that could prejudice the formation of the Country Park will not be permitted.