

5. SITE ALLOCATIONS

SDA43: Land North of Kings Lane - Page 231 to 232

Coldwaltham Parish Council acknowledges the care and thought which has gone into the preparation and compiling of this Local Plan.

However, Coldwaltham Parish Council believe the allocation SDA43 is in contradiction to existing policies and has not followed correct process for its inclusion.

The authority, we fear, in ignoring precedent set elsewhere (Three Rivers District Council Sub Committee Report – 12 May 2025) and is potentially setting itself up for future challenges.

SDNPA appear to have ignored the need for a full consultation on its Sustainability Appraisal for SDA43 and that the Sustainability Appraisal relating to SDA43 is not robust.

Discrepancies have been noted in the Local Plan documentation, as the table in Section SDH10 (page 102) indicates that there is no need for any GTAA & SP sites in the Horsham District area, in any year to 2042; this is borne out by the SDNPA's own report dated December 2024, (<https://www.southdowns.gov.uk/app/uploads/2023/05/South-Downs-Brighton-and-Hove-and-Adur-and-Worthing-GTAA-Final-Report-December-2024.pdf>). However, the Site Allocation SDA43 (page 232) identifies the proposed site in Coldwaltham Parish. This site is currently still only a proposal under this Local Plan Review and therefore still being considered with no formal decision yet made.

Coldwaltham Parish Council (CPC) **OBJECTS** to the inclusion of site SDA43 for GTAA & SP allocation in the Local Plan under review.

Our Reasons Are:

In SDNPA's Integrated Impact Assessment (IIA) (dated March 2026) (<https://www.southdowns.gov.uk/app/uploads/2026/05/Local-Plan-Regulation-19-Integrated-Impact-Assessment.docx>) paragraph 1.6, states that "To be effective, the appraisal process must be fully integrated into the plan making process and applied at each stage of document production". We note that this site SDA43 has been added to the Local Plan after Regulation 18, following the call for GTAA & SP sites in 2025, which had already been pre-empted by a planning application made by the resident in November 2025, and before this allocation had appeared in this Regulation 19 Submission. This raises questions about the process between Regulation 18 and 19 with reference to a planning application and this allocation.

Paragraph 5.14 of the IIA states that allocation is a professional judgment based on technical studies and "consultation responses as part of an iterative process". In our view an "iterative process" implies one in which new proposals are subject to new consultation. We also note that at Stage A of SDNPA's assessment process in the IIA, the Kings Lane site scored five negative impacts out of eleven in Table H for Sustainability Objectives. We do not agree that any proposed "mitigations" can materially change these assessments in the way that SDNPA

suggests in Tables W in the IIA. Indeed, site SDA43 scored the lowest of the three reviewed sites in the Horsham District Area, this evidence would suggest that this site is least suitable.

There has been no evidence of any meaningful attempt by SDNPA to “talk to affected Parish Councils about any proposed change to allocations.” In fact, that there was no communication between SDNPA and CPC after January 21st 2026; there was no communication regarding a group visit to the site (SDA43) by park employees and/or committee members which was observed and questioned by residents, about which CPC had no information.

Under paragraph 1.11 of the Local Plan: SDNPA has acknowledged that “distinctive towns and villages, and communities with real pride in their areas” and therefore are South Downs National Park’s special qualities. *The CPC would add that local architecture, and village life should be appreciated and protected. Some villages have experienced disproportionate development and lost their identity. There is a need to balance the wellbeing of local communities which CPC have strived to promote.*

Site SDA43 would embarrass this principle

Under paragraph 1.13: The CPC note that SDNPA are “seeking to increase the amount of land in the National Park managed for nature to 33% by 2030” *SDA43 would contradict this paragraph as it would use agricultural land for a GTAA & SP site.*

Under paragraph 2.1: The SDNPA vision statement is “The South Downs National Park is a vibrant place with nature everywhere, for everyone, where wildlife flourishes, clean water flows and stars fill the dark night skies. Together we care for a climate-resilient landscape with thriving communities and a dynamic green rural economy at its heart. Shaped by stories old and new, this place inspires everyone to connect, enjoy, belong and take action.”

Again, under paragraph 2.2: The SDNPA statement is “Creating special places inspired by this nationally important landscape, enabling people and nature to flourish.”

Coldwaltham Parish Council applaud both these comments (2.1 and 2.2) as it demonstrates the SDNPA commitment to protect the unique nature of this National Park. However, this statement would be negated by using site SDA43 for any development. This is confirmed as the Kings Lane site (SDA43) scored negatively in Table H SDNPA (IIA) (March 2026) for National Park’s landscape character, functionality and perception and special qualities.

Local Plan Objective 9: “We will support development that improves the accessibility of the National Park, reduces car travel and facilitates sustainable modes of transport including active travel through better and new public rights of way and access land, safe and attractive pedestrian, equestrian and cycle routes and improved public transport.”

This objective cannot be achieved at SDA43 as there:

- *As there is very limited availability of public transport through the village of Coldwaltham; there is an erroneous statement that there is public transport available in the village every day. **This is not true.** Buses are available once a day on only three days a week from Coldwaltham to Pulborough (for all facilities), however, this is the day’s return journey, therefore there is no service back to Coldwaltham that day.*

- *This is confirmed as the Kings Lane site (SDA43) scored negatively in Table H SDNPA (IIA) (March 2026) for Efficient transport network.*
- *This is also confirmed by the SDNPA own Settlement Facilities Assessment Report dated May 2026, which scored zero for bus services.*
- *There is a lack of any safe pedestrian or cycle routes to key services and facilities from this site.*
- *The siting of unlimited touring caravans and other vehicles will generate an unacceptable increase in traffic, which would not reduce travel as this policy requires.*

Under paragraph 3.11: the concept of Ecosystems Services – highlights “such as the soils that provide our food, the rivers and aquifers that provide our drinking water, and the fresh air and tranquillity that is so essential to our health and wellbeing. We want to continue to ensure that new development brings positive benefits to ecosystems and the services they provide.”

This cannot be achieved at Site SDA43 as:

- *This is confirmed as the Kings Lane site (SDA43) scored negatively in Table H SDNPA (IIA) (March 2026) for Biodiversity and contribution to nature recovery.*
- *there is recurring surface flooding along Kings Lane itself and at the junction with the A29;*
- *landscape sensitivity requirements, including landscape character (SDL1), Relative Tranquillity (SDL4), Dark Night Skies (SDL5) and Water and Pollution (SDW5), Nutrient Neutrality (SDN7) and proximity to protected sites, especially the Arun basin RAMSAR protected wetland, SAC and Special Protected Area;*
- *infrastructure and drainage constraints affecting the site and surrounding area.*
- *The Environmental Health Officer, in her email of 17th February 2026 on Application SDNP/25/03961/FUL, highlighted her concerns regarding the environmental impact of the site.*
- *The siting of unlimited touring caravans on this site will further exacerbate the potential of overloading by the sewage and waste facilities.*
- *Southern Water proposes to lay an additional mains water pipeline through this site, which restricts the positioning of structures. Conversation with Southern Water needs to continue re the planning and siting of this proposed pipeline.*

Under Strategic Policy SDC2 – Objective 9: SDNPA will support development... which reduces car travel and facilitates active travel through better and new public rights of way and access land, safe and attractive pedestrian, equestrian and cycle routes.”

This cannot be achieved at Site SDA43:

- *As there is very limited availability of public transport through the village of Coldwaltham; there is an erroneous statement that there is public transport available in the village every day. **This is not true.** Buses are available once a day on only three days a week from Coldwaltham to Pulborough (for all facilities), however, this is the day’s return journey, therefore there is no service back to Coldwaltham that day.*
- *This is confirmed as the Kings Lane site (SDA43) scored negatively in Table H SDNPA (IIA) (March 2026) for Efficient transport network.*
- *This is also confirmed by the SDNPA own Settlement Facilities Assessment Report dated May 2026, which scored zero for bus services.*
- *the lack of safe pedestrian and cycle routes to key services and facilities.*

- *The siting of unlimited touring caravans will generate an unacceptable increase in traffic, thereby not reducing vehicle movements.*

Again, Under Strategic Policy SDC2 – Objective 14: SDNPA will support development that enhances the role of towns and villages as social and economic hubs, ... and facilities.”

- *The only facilities Coldwaltham offers are a public house, a school and a church.*
- *The nearest shops, GP Surgeries and Chemist are only available two miles distant in Pulborough.*
- *This is held up by the SDNPA own Settlement Facilities Assessment Report dated May 2026, which highlights the lack of resources within the parish.*

Currently, Church Hill (in Pulborough) is restricted to vehicle access only, making these facilities more inaccessible without personal transport as there is no availability of public transport from the village of Coldwaltham. Buses are available once a day on only three days a week from Coldwaltham to Pulborough (for all facilities), however, this is the day’s return journey, therefore there is no service back to Coldwaltham that day.

Under paragraph 4.8 Part 2(d): “refers to a sustainable location. This is to make it clear that previously developed sites that are remote from services and facilities, increasing dependency of occupants on transport by private car, will not be considered appropriate for reuse.” *This upholds our previous comment above regarding the need for transport by private car at the site SDA43.*

- *As there is very limited availability of public transport through the village of Coldwaltham; there is an erroneous statement that there is public transport available in the village every day. **This is not true.** Buses are available once a day on only three days a week from Coldwaltham to Pulborough (for all facilities), however, this is the day’s return journey, therefore there is no service back to Coldwaltham that day.*
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- *the lack of safe pedestrian and cycle routes to key services and facilities.*
- *The siting of unlimited touring caravans will generate an unacceptable increase in traffic, thereby not reducing vehicle movements.*

In Strategic Policy SDL4 (page 38): - “The purpose of the policy is to ensure that development does not harm the tranquillity of the countryside so that people can enjoy this special quality of the National Park.” *Evidence has shown that the tranquillity of the site (SDA43) has already been breached by; working at night under lights, burning of waste, moving earth with heavy machinery. SDA43 would contravene this purpose.*

In Strategic Policy SDL5 (page 39) Point 1: “Development proposals will be permitted where they conserve and take opportunities to enhance the intrinsic quality of dark night skies for people and wildlife”. *There is evidence of work being carried out at the site (SDA43) at night thereby requiring strong/bright lighting which contravenes this policy.*

In Strategic Policy SDL6: Historic Environment and Cultural Heritage (point 1) (page 41) “Development proposals will only be permitted where they conserve and enhance the historic environment and cultural heritage, including through the safeguarding of heritage assets and their setting;” *The proposed site (SDA43) has evidence of prehistoric, Roman, and medieval archaeological remains uncovered in Coldwaltham to the south of this site, suggesting the presence of a historical settlement site, surrounding Coldwaltham and extending to the south-east.*

- *This is confirmed as the Kings Lane site (SDA43) scored negatively in Table H SDNPA (IIA) (March 2026) for Historic environment, heritage assets and their settings and cultural heritage.*

In Strategic Policy SDL9: Archaeology Point1: “Development proposals will be permitted where they do not cause harm to archaeological heritage assets and/or their setting (whether designated or undesignated).” *SDNP’s own Archaeological Consultant highlighted that the proposed site (SDA43) has evidence of prehistoric, Roman, and medieval archaeological remains uncovered in Coldwaltham to the south of this site, suggesting the presence of a historical settlement site, surrounding Coldwaltham and extending to the south-east. The full report can be found on the application SDNP/25/03961/FUL.*

- *This is confirmed as the Kings Lane site (SDA43) scored negatively in Table H SDNPA (IIA) (March 2026) for Historic environment, heritage assets and their settings and cultural heritage.*

In Strategic Policy SDN4: The Arun Valley Special Protection Area (SPA) paragraph 4.95: “The Arun Valley SPA is designated for its wintering population of Bewick’s swan. Bewick’s swans frequently feed on suitable farmland up to 5km from the designated site and therefore suitable fields within 6.5km of the SPA.” *Coldwaltham Parish Council confirms that the proposed site (SDA43) is within a 5km distance of the Arun Valley. Furthermore, White-Tailed Eagles and Red Kites have recently been introduced by the RSPB to Pulborough Brooks, so this site would further contravene this policy.*

In Strategic Policy SDN8 – “The purpose of this policy is to ensure the management, including conservation and enhancement, of existing trees, woodlands, hedgerows,” *Access to the site (SDA43) is via a narrow country lane which has hedgerows on either side, these need to be protected against any destruction from any traffic generated accessing this site. The proposal is for a two pitch GTAA & SP site with both mobile homes and touring caravans which would have to access this site along this restricted lane.*

At various points along Kings Lane there is a ditch running alongside the road between it and the hedge, large vehicles and touring caravans could damage the verge pushing earth into the ditch thereby causing a blockage which would ultimately lead to further flooding. Additionally, there is risk of these large vehicle and touring caravans ending up in the ditch.

The continual access to the site by the touring caravans would further risk damage to the hedgerows.

Strategic Policy SDW1: “The purpose of this policy is to protect and enhance groundwater and surface water features; ensuring that the proposed development, either individually or cumulatively does not cause the quality of groundwater and surface water assets to deteriorate.” *The potential development of site SDA43 would pose a threat to groundwater and surface water features.*

Also, in Strategic Policy SDW2: “The purpose of this policy is to reduce vulnerability to flood risk and the impacts of flooding.”

- *Documents show that flooding occurs frequently along the access lane every winter, which would only be exacerbated by further run off hardstanding within the site (SDA43) required for mobile homes and touring caravans.*
- *At various points along Kings Lane there is a ditch running alongside the road between it and the hedge, large vehicles and touring caravans could damage the verge pushing earth into the ditch thereby causing a blockage which would ultimately lead to further flooding.*

In Addition, in Strategic Policy SDW3: “The purpose of this policy is to reduce vulnerability to surface water flooding through appropriate management and ensuring there is no net increase in surface water runoff from new development.” *There is a field drainage ditch along the western boundary of the site SDA43 which would be fouled by any wastewater which ultimately would drain into the River Rother and then The River Arun. (refer to the Arun Valley Special Protection Area).*

- *The positioning of any Wastewater Management System would need to consider the field drainage ditch, and ease of access when disposing of waste.*
- *The Environmental Health Officer, in her email of 17th February 2026 on Application SDNP/25/03961/FUL, highlighted her concerns regarding the environmental impact of the site with regards to wastewater management.*

In Strategic Policy SDW5: “The purpose of this policy is to set out how the National Park will be protected from air, noise, vibration, light, water, odour or other pollution arising from developments.” *Our response has identified problems with this at site (SDA43) on all these aspects.*

Not mentioned in this Local Plan, however, concerns were raised regarding the accessibility into the proposed site for Refuse Vehicles, Highway Maintenance and other Service Vehicles. Also, the Fire Officer highlighted the difficulty for their vehicles should any incident occur, as access to the nearest fire hydrant is beyond the 175m required for domestic residences.

In conclusion;

The Parish Council has concerns that SDA43 was brought forward without sufficient engagement with the parish.

The Parish Council has grave concerns regarding the continued monitoring of the site with regards to the environmental issues and the number of touring caravans on the site at any one time.

*As a result, the Parish Council **is not satisfied** that SDNPA has demonstrated that SDA43 is supported by sufficient and compliant evidence to justify its inclusion.*

Coldwaltham Parish Council

June 2026