

Horsham District Local Plan 2019-36: Public Consultation (Regulation 18)

Thakeham Homes' proposal for a development of 3,500 new homes on 443 acres of open countryside at Buck Barn, West Grinstead

Assessment against HDC's current and proposed Local Plan Policies

Nuthurst Parish Council strongly opposes the above scheme for inclusion as a strategic site in the Horsham District Local Plan and it urges HDC to remove the scheme from the Plan. The main reason is that the proposal fails to comply with very many of HDC's strategic and non-strategic policies in both its current Local Plan and in its proposed Local Plan as demonstrated below. The Parish Council's comments are given in green type.

1. Sustainable Development

1.1 HDC's current Local Plan: Strategic Policy 1: Sustainable Development

This is a policy that "reflects the presumption in favour of sustainable development"

1.2 HDC's proposed Local Plan: Strategic Policy 1: Sustainable Development

This is a policy that "reflects the presumption in favour of sustainable development"

Comment:

"Buck Barn" is not a sustainable site.

Public transport links are poor and would inevitably result in the heavy use of private cars. To quote just a few examples:

Rail. There is no direct access by public transport to the nearest rail station at Christs Hospital. This station is about six miles away if accessed by foot or cycle via the Downs Link and even then, requires the use of roads to reach the station. Horsham station is about 8 miles away. Existing commuters have great difficulty parking at Horsham station as the car park is invariably full before 7.30 am and they often have to stand as they cannot get a seat on the trains.

Bus. Bus route 23 from Buck Barn to Horsham takes 30 minutes. Horsham is the nearest centre for retail and leisure activities such as the cinema, swimming pool, bowling, library, golf course, gym and running track. There is no bus service along the A272 to Cowfold. The developer's offer of a park and ride bus service is inconsequential as the developer would lack control over whether it continued to operate or not.

Access to major trauma hospitals at Redhill, Brighton and Worthing could only realistically be achieved by car.

Services. Services in the vicinity are lacking and particularly regarding access to health facilities such as: child guidance, adult mental health, obstetrics, elderly care clinics, dentists

and opticians. The ambulance service is based in Horsham some distance away and is already over-burdened with the rapidly rising population in Horsham due to development at Broadbridge Heath and along the A264. It now has severe issues meeting targets for arrival times.

Local employment opportunities. Local employment opportunities for the residents of three and a half thousand homes would be severely limited or non-existent. Most of the residents would be obliged to travel northwards to the Gatwick Triangle, or London, which is a minimum of one and a half hours distant by bus and train. It would not deliver the required one new job for each new house.

Buck Barn does not comply with the current Policy 1 or the proposed Policy 1 as it is not a sustainable site.

2. Strategic Development

2.1 HDC's current Local Plan: Strategic Policy 2: Strategic Development

Regarding its spatial strategy, this states:

"1. Focus development in and around the key settlement of Horsham, and allow for growth in the rest of the district in accordance with the settlement hierarchy."

Comment:

Buck Barn does not comply with current Policy 2 because it is not in or near any settlement. It is an isolated area of open countryside.

3. Development Hierarchy and Settlement Expansion

3.1 HDC's current Local Plan: Strategic Policy 3: Strategic Policy: Development Hierarchy

This states that:

"Development will be permitted within towns and villages that have defined built-up areas."

This settlement hierarchy means that strategic sites will be located within, or adjacent to, towns and larger villages.

3.2 HDC's proposed Local Plan: Strategic Policy 2: Development Hierarchy

This states that:

"Development will be permitted within towns and villages that have defined built-up areas."

This settlement hierarchy means that strategic sites will be located within, or adjacent to, towns and larger villages.

3.3 HDC's proposed Local Plan: Strategic policy 3: Settlement Expansion

This states that:

*“The growth of settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of settlements will be supported where **all** of the following criteria are met, (which include):*

- 1. The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge;*
- 2. The level of expansion is appropriate to the scale and function of the settlement type;*
- 5. The development is contained within an existing defensible boundary and the landscape and townscape features are maintained and enhanced”*

Comment:

“Buck Barn” is not in, or adjacent to, any of the towns or villages in the long list of places listed in the settlement hierarchy. It is isolated from any settlement, in open countryside.

The site is not allocated for development in the Neighbourhood Plan and it does not join an existing settlement edge. Furthermore the site was assessed as “not developable” in HDC’s current SHELAA (January 2019).

Covering 443 acres of open countryside with 3,500 houses and other buildings is bound to ruin the landscape features. There will be considerable loss of hedges, ancient woodland and productive farmland. Furthermore, the site does not feature in HDC’s Landscape Character Assessment. The Landscape Capacity Map for Zone 2 (land south of Horsham to Southwater) shows that “Buck Barn” is close to but outside an area categorised as having “low/no capacity for large scale development”. It follows therefore that that the “Buck Barn” site has absolutely no capacity for large scale housing development according to HDC’s Landscape Capacity Assessment.

Buck Barn does not comply with current Policy 3 or proposed Policies 2 and 3 on Development Hierarchy and Settlement Expansion because it is not within or adjacent to any settlement.

4. Environmental Protection

4.1 HDC’s current Local Plan: Strategic Policy 24: Environmental Protection

This states that:

“To minimise the air pollution and greenhouse gas emissions in order to protect human health and the environment”

“Contribute to the implementation to the Local Air Action Plans and do not conflict with its objectives”

“Maintain or reduce the number of people exposed to poor air quality”

4.2 HDC’s proposed Local Plan: Strategic Policy 25: Environmental Protection

This states that:

“Developments will be expected to minimise exposure to, and the emission of, pollutants including noise, odour, vibration, air and light pollution...”

4.3 HDC’s proposed Local Plan: Policy 26: Air Quality

This states that:

“Major development proposalsor in relevant proximity to an Air Quality Management Zone must be accompanied by an Air Quality Impact Assessment and an Emissions Mitigation Assessment.”

Comment:

The proposed development of three and a half thousand new homes would add somewhere in the region of seven thousand domestic vehicles to local roads, some of which are narrow rural lanes. Additionally, lorry and van traffic would increase due to the rising use of electronic purchasing by households, the delivery of LPG gas and oil, the need for refuse collection for the proposed large number of new homes and the proposed shops, schools, pub and surgery. Much of this traffic would use the A272 Cowfold Road which is already heavily used at peak times.

Cowfold is already an Air Quality Management Area. It has the highest level of air pollution within the District, compromising the health and well-being of its 2,000 inhabitants and school children, the fabric of an ancient church and the nearby environment. Air quality in Cowfold regularly exceeds the nitrogen dioxide emission limit in the Environment Act 1995. Development of this isolated site would result in hugely increased traffic flows and pollution and would significantly worsen air quality in Cowfold. There has been no Air Quality Impact Assessment or Emissions Mitigation Assessment for the Cowfold Air Quality Management Area. This contravenes proposed policy 26 on Air Quality.

Light pollution would increase dramatically in the countryside as a result of building 3,500 houses. Furthermore, the proposal to floodlight the Downs Link is unacceptable.

Buck Barn would contravene HDC’s current Policy 24 and proposed Policies 25 and 26 on Environmental Protection and Air Quality.

5. Countryside Protection, the Natural Environment and Landscape Character

5.1 HDC’s current local plan: Strategic Policy 26. Countryside Protection

This states that:

“Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location and in addition meet one of the following criteria:

- 1. Support the needs of agriculture or forestry;*
- 2. Enable the extraction of minerals or the disposal of waste;*
- 3. Provide for quiet recreational use; or*

4. *Enable the sustainable development of rural areas.*”

“In addition, proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level activity in the activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located, including:

- 1. The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change; and*
- 2. The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features.”*

5.2 HDC’s proposed local plan: Strategic Policy 28: Countryside Protection

This states that:

1) *“Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location and in addition meet one of the following criteria:*

- a) Support the needs of agriculture or forestry;*
- b) Enable the extraction of minerals or the disposal of waste;*
- c) Provide for quiet recreational use; or*
- d) Enable the sustainable development of rural areas.”*

2) *In addition, all proposals must be appropriately integrated within the landscape and be of a scale appropriate to its countryside location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level activity in the activity in the countryside, and protects, conserves, and seeks to enhance, the key features and characteristics of the landscape character area in which it is located, including:*

- 1. The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change; and*
- 2. The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features.”*

5.3 HDC’s proposed local plan: Strategic Policy 27: The Natural Environment and Landscape Character

This states that:

“Proposals will be required to

- 1) Protect, conserve and enhance the landscape and townscape character, taking into account areas identified as of landscape importance”*
- 2) Maintain and enhance the Green Infrastructure Network”*

Comment:

This site is classified as Grade 3 agricultural land with good to moderate fertility. At present, the majority of its many fields are given over to arable farming though other farming and countryside activities exist including dairy and sheep farming (including wool), geese and game-bird rearing, and equine use. To remove acres and acres of productive agricultural

land from use would be contrary to current Policy 26 and draft Policy 28 and reduce employment opportunities in the farming industry. The proposal would destroy the landscape – it certainly would not “protect, conserve and enhance it”

The proposed development of three and a half thousand homes is not essential to a countryside location. It would not support agriculture or mineral extraction, or provide a quiet, tranquil environment and it is not in a sustainable location.

Buck Barn would destroy the pattern of fields, hedgerows and woods that have survived for nearly a thousand years making the area’s agrarian history hard to read in the future. Surrounding its Grade II Listed Farm Buildings with modern houses should not meet with approval.

Therefore Buck Barn does not comply with current Policy 26 and proposed Policies 28 and 27 on Countryside Protection, the Natural Environment and Landscape Character.

6. Green Infrastructure and Biodiversity

6.1 HDC’s current Local Plan: Policy 31: Green Infrastructure and Bio-diversity

This states that:

“1. Development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigate or compensates for this loss and ensures that the ecosystem services of the area are retained.

2. Development proposals will be required to contribute to the existing biodiversity and should create and manage new habitats where appropriate.”

6.2 HDC’s proposed Local Plan: Policy 31: Green Infrastructure and Biodiversity

This states that “development proposals should therefore consider how they can contribute to the following:

1. **Hedgerows** in the Low Weald (providing important connectivity between fragmented habitats)
2. **Woodland** – new planting and allowing natural regeneration, important tools in capturing more carbon and helping wildlife.”

It also states “that:

1. Development will be supported where it can demonstrate that it maintains and enhances the existing network of green infrastructure, the Nature Recovery Network, natural capital and biodiversity. Proposals that would result in the loss of the existing network of green infrastructure or part of the Nature Recovery Network, will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss ...
2. Proposals will be expected to retain and enhance existing fresh water features, hedgerows, trees and deciduous woodland ...”

Comment:

Replacing the current green infrastructure with three and a half thousand homes and removal of many hedgerows and ancient woodland will result in a significant loss of biodiversity. The loss of 443 acres of open countryside will diminish the numbers of birds, insects and mammals, particularly during the inevitably noisy construction phase which is scheduled to last for some fifteen years. It should be noted that a number of species may migrate to and from the nearby “re-wilded” Knepp Castle estate thereby compromising its programme of re-establishing a locally rich biodiversity. Furthermore the proposed lighting of the Downs Link would have a severe adverse effect on the fauna of the area, particularly on the movement of birds and animals between locations.

The proposed development will result in the loss of many hedgerows thus removing the connectivity between habitats. The loss of many stands of ancient woodland, individual veteran trees and ghyll woods will remove sources for capturing carbon thus contributing to global warming and climate change.

There is no way that these losses of green infrastructure and biodiversity can be mitigated or compensated for when 443 acres of open countryside are to be concreted over with 3,500 houses

Therefore Buck Barn contravenes HDC’s current Policy 31 and proposed Policy 31 on Green Infrastructure and Biodiversity

7. Heritage Assets and managing change in the Historic Environment

7.1 HDC’s current Local Plan: Policy 34: Heritage Assets and managing change in the Historic Environment

This states that:

“The Council recognises that heritage assets are an irreplaceable resource, and as such the Council will sustain and enhance its historic environment through positive management of development affecting heritage assets. Applications for such development will be required to:

- a) Preserve, and ensure clear legibility, locally distinctive vernacular building forms and their settings, features, fabric, and materials”.*

7.2 HDC’s proposed Local Plan: Policy 35 Heritage Assets and managing change in the Historic Environment

This states that:

“The Council recognises that heritage assets, both designated and non-designated, and their settings are an irreplaceable resource, and as such the Council will preserve and enhance its historic environment through positive management of development affecting heritage assets. Applications for such development will be required to:

- 4. Preserve, and ensure clear legibility of, locally distinctive vernacular building forms and their settings and features including trees, fabric, and materials”.*

Comment:

Records show that this site has been farmed since at least 1296, the date of the earliest record for West Grinstead. The loss of the field system, hedgerows and ancient woodland will prevent any subsequent reading of the area's agricultural and architectural history.

There are fifteen Grade II listed buildings both within and near to the proposed development site. There are eight more Grade II listed buildings just south of the proposed development site and likely to be affected by the proposed large roundabout and flyover.

Nothing suggested by the developer as mitigation would compensate for the harm done to this significant example of Low Weald landscape.

Buck Barn would contravene HDC's current Policy 34 and proposed Policy 35 on Heritage Assets and managing change in the Historic Environment.

8 Flooding

8.1 HDCs' current Local Plan Strategic Policy 38: Flooding

This states that:

"...priority (will be given) to development sites with the lowest risk of flooding.

b. Development proposals will avoid the functional floodplain (Flood Zone 3b)...

c. Only be acceptable in Flood Zone 2 and 3 following a sequential test and exceptions tests if necessary

d. Require a site-specific flood risk assessment for all developments over one hectare in Flood Zone 1 and all proposals in Flood Zone 2 and 3."

8.2 HDC's proposed Local Plan: Strategic Policy 40: Flooding

This states that:

"... Priority is given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere.

Development proposals will:

c. avoid development on the functional floodplain (Flood Zone 3b)...

d. only be acceptable in Flood Zone 2 and 3 following a sequential test and exceptions tests if necessary...

f. require a site-specific flood risk assessment for all developments over one hectare in Flood Zone 1 and all proposals in Flood Zone 2 and 3."

Comment:

This site is not at low risk of flooding. A tributary of the River Adur runs through the whole length of this site from north to south. Land surrounding the tributary is categorised as Flood Zone 3.

The proposed development should not be considered for inclusion in the Local Plan until the site-specific flood risk assessment has been completed and the outcomes are satisfactory;

Building three and a half thousand new homes and other buildings on open countryside, and the associated hard infrastructure such as drives, roads and footpaths, will remove a considerable amount of land that currently serves to absorb rainfall. Inevitably, flooding will worsen.

Buck Barn would contravene HDC's current policy 38 and HDC's proposed policy 40 on Flooding because part of the site is in Flood Zone 3.

9. Sustainable Transport

9.1 HDC's current Local Plan: Policy 40: Sustainable Transport

This states that:

"Development will be supported if it:

- 1. Is appropriate in scale to the existing transport infrastructure including public transport"*

9.2 HDC's proposed Local Plan: Policy 42: Sustainable Transport

This states that:

"Development will be supported if it:

- 2. Minimises the distance people need to travel and minimises conflict between traffic, cyclists and pedestrians;*

Comment:

The existing public transport links are very poor. Whilst there is a half-hourly bus service along the A24 linking Buck Barn to Horsham, half an hour away, and Worthing, three quarters of an hour away, there is no service along the A272 to Cowfold.

There is no easily accessible rail service.

It is not responsible to suggest that placing three and a half thousand new homes in such an unsustainable location is acceptable. Some seven thousand people would inevitably find it necessary to travel by car to work and to essential services. This amount of extra traffic will increase air pollution, particularly at Cowfold, the worst air pollution are in the District. This pollution would therefore contribute to the rapid rise in pulmonary ill-health in this country.

Buck Barn therefore does not comply with HDC's current Policy 40 and proposed Policy 42 on Sustainable Transport because the site is not in a sustainable location.

10. Other matters

10.1 A comment on Thakeham Homes' proposal for the Buck Barn junction

The proposal to do away with the traffic lights at the Buck Barn junction is flawed.

Traffic lights currently control the traffic flow at this junction perfectly well. There are no “hold-ups” and the traffic lights give benefits elsewhere. The “pulsing” flow of traffic engendered by the traffic lights allows vehicles attempting to join the A24 and A272 to find a pause in the traffic in which to make this manoeuvre safely. This is especially beneficial on the A24, where traffic can reach speeds up to 60 mph and in stretches up to 70 mph.

A proposal of a flyover is similarly flawed. It would destroy yet more arable land and would impact badly on the 8 Grade II listed buildings just south of the A272 near the Buck Barn junction. Crucially, it would create greater problems further along the road system. Cowfold roundabout is already a “pinch-point” where long traffic queues are common. More free-flowing traffic would exacerbate this already existing problem and worsen the already poor air quality in Cowfold. Exactly the same consequence would occur at Washington roundabout on the A24 where traffic queues can stretch for miles at peak times.

The road infrastructure proposals describe changes at the Buck Barn junction that are both unnecessary and unwanted.

2.5 A comment on Thakeham Homes offer of building a doctors’ surgery

This lacks realism. It is unlikely that any GP practice would find it viable to have only seven thousand patients. Twelve to fourteen thousand would be a more viable number. Please note that people already living in the vicinity would be few, and would have their own GP already.

2.6 A comment on Thakeham Homes offer to build three schools

This proposal is also unrealistic. Three and a half thousand homes is unlikely to yield sufficient children to warrant this number of schools. Additionally, a secondary school has been proposed for Southwater for the past twenty years. Should one be needed, Southwater is a far more sustainable location.

CONCLUSIONS

The inclusion of the proposed Buck barn development in HDC’s revision of its Local Plan is vigorously opposed by Nuthurst Parish Council. Effectively, Thakeham Homes intends to build a town in a productive agricultural and rural location that is isolated from any settlement. This kind of appallingly unsympathetic development would ruin this part of the Low Weald and set a precedent for developers to turn the whole area into a creeping urban conglomerate.

The Parish Council considers that the failure of the proposal to comply with so many of HDC’s Strategic and Non-Strategic Policies must surely mean that it must not be included as a strategic site in HDC’s revision of its Local Plan.