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18 November 2019

Mrs Catherine Howe  
Head of Strategic Planning  
Horsham District Council  
Parkside, Chart Way  
Horsham RH12 1RL

Dear Catherine

**Thakeham Homes' proposal for a development of 3,500 new homes on 351 acres of open countryside at Buck Barn, West Grinstead ("Weald Cross")**

Nuthurst Parish Council strongly opposes the above scheme for inclusion as a strategic site in the review of the Horsham District Planning Framework for the reasons given below. The reasons are organised into Part 1 (non-compliance with HDC's Strategic Policies) and Part 2, (non-compliance with HDC's Non-Strategic Policies). The Parish Council's comments are in green.

**PART 1: Non-compliance with HDC's strategic planning policy**

**1.1 HDC's Strategic Policy 1: Sustainable Development**

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

**Comment:**

"Weald Cross" 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 Downlink 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.

## **1.2 HDC's 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:**

*"Weald Cross" does not comply with this policy because it is not in or near any settlement. It is an isolated area of open countryside.*

## **1.3 HDC's 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.

**Comment:**

*"Weald Cross" 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.*

*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 "Weald Cross" is close to but outside an area categorised as having "low/no capacity for*

*large scale development". It follows therefore that that the "Weald Cross" site has absolutely no capacity for large scale housing development according to HDC's Landscape Capacity Assessment.*

#### **1.4 HDC's 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"*

#### **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. To worsen this currently unacceptable situation by including this proposed development in the Strategic Plan would be highly contrary to HDC's own policy.*

#### **1.5 HDC's 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.”

**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 Policy 26 and reduce employment opportunities in the farming industry.*

*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.*

*“Weald Cross” 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.*

## **1.6 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.”*

**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 Strategic Plan until the site-specific flood risk assessment has been completed and the outcomes are satisfactory.*

*Building three and a half thousand new homes 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.*

## **PART 2: Lack of compliance with Non-Strategic Policies**

### **2.1 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.”*

#### **Comment:**

*Replacing the current green infrastructure with three and a half thousand homes will result in a significant loss of biodiversity. The loss of 351 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.*

*There is no evidence that ancient woodland, veteran trees, ghyll woods and a precious field of wild orchids would, in perpetuity, survive any large-scale building development over a long period of some fifteen years and with different supervisory staff. The pressure on this habitat might become impossible to manage in future years.*

### **2.2 Policy 34: Cultural and Heritage Assets**

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:*

- 5. Preserve, and ensure clear legibility, locally distinctive vernacular building forms and their settings, features, 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 and isolation of ancient Grade II listed farmhouses amongst modern housing would 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.*

### **2.3 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”*

#### **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, thereby contributing to the rapid rise in pulmonary ill-health in this country.*

### **2.4 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. 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**

*This proposal 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 Planning Framework.*

Yours sincerely

**Sarah Hall**

Clerk, Nuthurst Parish Council

Copy: HDC's Cabinet members

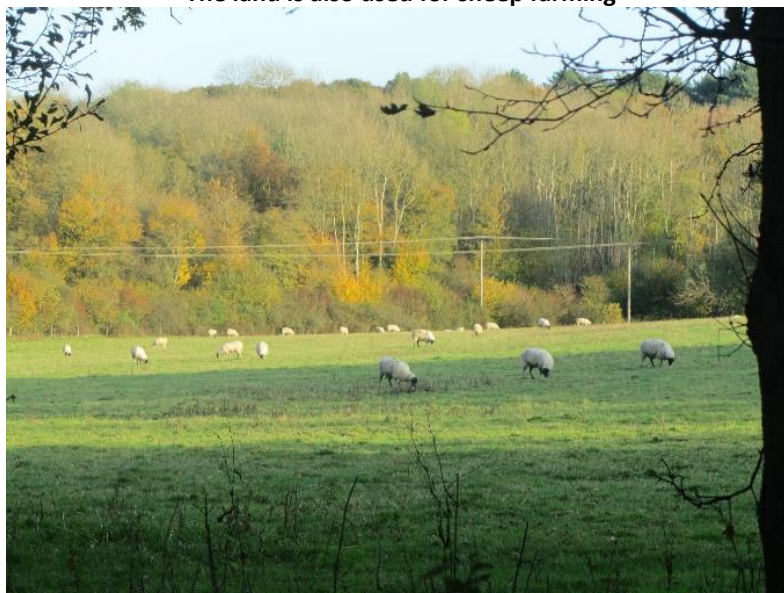
**Isolated from any settlement in 351 acres of open countryside**



**Most of the land is arable land Grade 3 "good to moderate"**



**The land is also used for sheep farming**





**One of the 23 Grade II Listed Buildings that are in or near this development**



**Part of site is in flood zone 3**



**Ancient woodland within the site (and a field with rare orchids)**



**A veteran tree over 600 years old within the site**



**Is this what people want instead?**

