

SUMMARY OF NUTHURST PARISH COUNCIL'S COMMENTS ON HDC'S ASSESSMENT OF THE BUCK BARN SITE

1. The concept of a new town sited in open countryside

This is a vitally important issue. The Low Weald landscape is already diminishing in area and should this scheme go ahead, it would act as a precedent and set in train a tragic loss of this type of landscape in West Sussex. Because so much is at stake, there should have been two requirements.

- Firstly, the developer should have been required to submit far more detailed plans for public consideration. For example, plans should show exactly how many shops, pubs, offices, factories, garages, other buildings and roads are proposed, and where they will be sited in relation to existing features such as the Adur tributary, public footpaths, the Downs Link, listed buildings and ancient woodland. Instead, the information put out for this public consultation is minimal and inadequate, and proper evaluations cannot be made.
- Secondly, far more time should be spent in collecting together independent information and allowing a detailed evaluation of the concept of a new town in the Low Weald. Instead, the scheme is being rushed through, which may benefit the developer, but not the 143 thousand people who live in the Horsham District and who stand to be massively affected if the scheme ever gains permission.

In summary, far more detail should be provided and time spent in testing the acceptability of this concept, namely placing a new town in this rural and isolated part of the Low Weald. It should be remembered that in the past, proposals to create new towns in Britain have taken far longer to plan and been open for scrutiny and judicial reviews for very extended periods. This was appropriate and good practice.

2. The assessments of the site are based far more on what the developer promises than independent, hard fact.

HDC has created fourteen assessment criteria. Yet, too many of these criteria have been assessed by HDC on the basis of what the developer has promised, rather than on hard and independent fact.

For example, because the developer has promised to provide land and build a surgery, “Health” has been assessed as a “favourable impact”. There is no report from the Clinical Commissioning Group saying that it would require a surgery in this location, or a viability study. Realistically, the fact is that no CCG would be interested in establishing a surgery for only 7000 people as it would be too small to be viable. Similarly, because the developer has promised to provide land and build three schools, “Education” has been assessed as “very positive impact”. Once again, there is no report from WSCC that three schools would ever be wanted in this location. Realistically, any secondary school would be built in Southwater, a location that has been mooted for a new secondary school for at least the last twenty years, and where the population is greater and nearer to sports facilities.

In summary, there should have been no assessments based on a developer’s aspirational promises, unsubstantiated by any independent, factual reports. Only factual evidence should have been assessed.

3. There are far too many assertions that have been accepted as fact in the assessment process

For example, the developer has asserted that biodiversity will be improved by building this new town in the countryside. This has resulted in the site being assessed as “neutral” for the criterion of “Biodiversity”. Yet, the developer has provided no evidence for this assertion and the public is thus unable to either accept the assertion, or challenge it. It appears sloppy in the extreme to proceed to evaluate the scheme to build a new town at Buck Barn purely on the basis of the developer’s assertions.

Additionally, the developer fails to record many relevant facts. This criterion of “Biodiversity” provides a good example as it omits to mention the re-wilding project at Knepp Castle, which is only a short distance away. This project will

endanger the migration of species from Knepp Castle to the Buck Barn site and vice versa. Had this fact been recorded, the assessment of “Biodiversity” may well not have been “neutral”, but worse.

The same applies with the criterion “Flooding and Drainage”. The phrase used in the assessment says, “The land contains some watercourses, although no land at risk from flooding is proposed for development” and this site has been accordingly assessed as being “neutral”.

What the developer does not record is that a tributary of the River Adur flows from north to south through the whole length of the site and that the land has been assessed by the Environment Agency as a Zone 3 flood risk area. Nor is there any consideration of the effect of development on flooding on land beyond the Buck Barn site. Nor does it record that according to HDC policy, development should not be considered before full surveys are made, and note that these should be independent surveys. The phrase “no land at risk of flooding is proposed for development” is another assertion. The developer has not produced a map showing the layout of the houses and other buildings in relation to the zone 3 flood risk area. The methodology used to assess the site against the criteria is extremely weak and any proper assessment would have judged this worse than a “neutral” site in relation to flooding.

In summary, full and accurate information should have been provided so that proper assessments could be carried out. At the moment, the assessments are very unreliable and provide no basis on which to make a decision on whether a new town should be built at Buck Barn.

4. Conclusion

The concept of new towns in the countryside is vitally important and needs examining far more fully, and at far greater length. More information is needed and it must be factual, supported by proper independent evidence. Only then will the assessments be reliable enough to permit a proper decision to be made on new towns in isolated countryside.

Until a far more rigorous examination of the concept is instituted, the Parish Council has no alternative but to strongly oppose the inclusion of Buck Barn in the Local Plan.