



**WEST GRINSTEAD PARISH
COUNCIL**

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18th November 2019

**Review of the Horsham District Planning Framework (HDPF) - Call for Strategic Sites and
Newhouse Farm, West Grinstead**

Dear Sir/Madam,

We are responding to the submission of the above site by Thakeham Homes as a strategic site for 3,500 new homes in the new Local Plan. We wish to object to this proposal in the strongest possible terms. Before setting out our reasons though it might be helpful to touch on what we all mean by West Grinstead.

The Parish of West Grinstead is so named for historic reasons and for those who are not familiar with the parish, it is made up of the settlements of Partridge Green, Dial Post, Littleworth and West Grinstead, of which Partridge Green is much the largest. In the settlement hierarchy, Partridge Green is classed as a Medium Village, while the other three are all unclassified settlements.

As part of the HDPF review process, HDC has looked at reclassifying some unclassified settlements as secondary settlements (see Issues and Options – Employment, Tourism and Sustainable Rural development – April 2018), admitting of the possibility that through a combination of characteristics (e.g. presence of services and facilities, presence of local employment, proximity of other services and settlement characteristics) they might be able to take a degree of residential infilling within defined secondary settlement boundaries. Thus, there are proposals that both Dial Post and Littleworth be classed as secondary settlements. They did also look at West Grinstead. but in that case, the recommendation is: ‘Do not designate as a secondary settlement’. In coming to that decision, they observed in relation to the settlement characteristics and sense of place: ‘West Grinstead comprises solely of the church with limited development nearby. Although there is a designated conservation area, there is no clear sense of having arrived in a small settlement. There are no other services and facilities at West Grinstead or near by.’ Essentially it is a very spread out and disparate settlement, running from St Georges Church south of the B2135 up to the B2135 and running north up Park Lane past the Catholic Church of Our Lady of Consolation and St Francis to the old West Grinstead Train Station on the A272. It also stretches down the A272, both north and south, going as far east as Champions Gate and as far west as the A24. There are groupings of dwellings such as those at Old Sussex Stud and along Worthing Road (the A24) north and south of Buck Barn, but they are very scattered. Therefore, what this proposed scheme represents is not a settlement attached to an existing one, but effectively, a completely new small garden town on greenfield land.

Our reasons for objecting to the scheme are:-

1. Policy 2 of the HDPF (Strategic Policy: Strategic Development) provides that: ‘To maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services and local employment, the spatial strategy to 2031 is:
 1. focus development around the key settlement of Horsham, and allow for growth in the rest of the district in accordance with the identified settlement hierarchy.’

This site is 6 miles from Horsham and effectively falls completely outside the settlement hierarchy. It would therefore be contrary to Policy 2. It would also, by extension, conflict with Policy 1 (Strategic Policy: Sustainable Development), Policy 3 (Strategic Policy: Development Hierarchy) and Policy 4 (Strategic Policy: Settlement Expansion)

Also, although Policy 2 does not mention Crawley, it should perhaps have done so, particularly having regard to Horsham being expected to take part of their unmet need.

2. Policy 26 of the HDPF (Strategic Policy: Countryside Protection) states:

‘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 informal 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 of 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
2. to change;
3. the pattern of woodlands, fields, hedgerows, trees, waterbodies and other features; and
4. the landform of the area.’

To support any proposal such as Wealdcross for a completely new small garden town in the open countryside would be a major breach of this policy. In fact, it would render it meaningless. It would also be completely at odds with the supplementary paper relating to Mayfield that HDC submitted to the Planning Inspector in 2014 when he was examining what was then the draft HDPF. Interestingly, in his Report dated 8 October 2015, the Inspector commented at para 52: ‘As I discuss in brief below, there are other large sites with the potential to meet requirements towards the end of the plan period. These options include land west of Ifield, near the area of need at Crawley, west of Southwater and east of Billingshurst. If the review identifies significantly increased requirements (and he clearly had in mind the possibility of a second runway at Gatwick – see para 84 of the Report), it is possible that the option of developing a new settlement may need to be considered in more depth. I consider that in the first instance it is for the Council to look again in more detail at the merits or otherwise of these options, together with other smaller sites and the monitoring of housing provision through NPs.’

Our view is that the Inspector’s approach, as set out above, must be the correct one. One should never discount entirely the possibility of building a new garden town, but it should be an option of last resort and regard should always be had to other factors such as transport links.

3. Where transport links are concerned, the HDPF is quite rightly at pains to stress the need to ensure that development ‘makes a clear contribution to mitigating and adapting to the impacts of climate change and to meeting the district’s carbon reduction targets as set out in the Council’s Acting Together on Climate Change Strategy, 2009’ (Policy 35 - Strategic Policy: Climate Change).

There is also a specific policy on Sustainable Transport (Policy 40) which provides that:

There is a commitment to developing an integrated community connected by a sustainable transport system.

In order to manage the anticipated growth in demand for travel, development proposals which promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged and supported.

Development will be supported if it:

1. Is appropriate and in scale to the existing transport infrastructure, including public transport.
2. Maintains and improves the existing transport system (road, rail, cycle).
3. Is integrated with the wider network of routes, including public rights of way and cycle paths.
4. Includes opportunities for sustainable transport which reduce the need for major infrastructure and cut carbon emissions.
5. Is located in areas where there are, or will be a choice in the modes of transport available.
6. Minimises the distance people need to travel and minimises conflicts between traffic, cyclists and pedestrians.
7. Delivers better local bus and rail services in partnership with operators and increasing opportunities for interchange between the public transport network and all other modes of transport.
8. Develops innovative and adaptable approaches to public transport in rural areas of the district.
9. Provides safe and suitable access for all vehicles, pedestrians, cyclists, horse riders, public transport and the delivery of goods.
10. Is accompanied by an agreed Green Travel Plan where it is necessary to minimise a potentially significant impact of the development on the wider area or as a result of needing to address an existing local traffic problem.

Key to this is access to trains. Christs Hospital Station is about 8 miles away. Horsham Station is a little closer at about 6.5 miles. Both are probably too far to walk. Cycling to Horsham Station would involve using the dual carriageway that is the A24, so is unlikely to appeal. Cyclists are more likely to take the longer option and use the Downs Link to Christs Hospital but would almost certainly be in a very small minority. Most are going to have recourse to car or bus. The existing bus service is well nigh non-existent, so the popularity of bus transport would be almost totally dependent on what new services are provided. Sadly, what has happened to rural bus services over the last 5 to 10 years would hardly inspire confidence.

4. Again on transport links and coming back to Policy 35 in the HDPF concerning Climate Change, Wealdcross is, of course, on the junction of the A24 and the A272. Three miles east down the A272 is the village of Cowfold. This in turn is at the junction of the A272 and the B2116. At peak hours this is subject to serious traffic congestion such that Cowfold is one of only two Air Quality Management Areas in the District. As such, it is required to have an Air Quality Action Plan, prepared by HDC in conjunction with West Sussex County Highways Department that reviews all possible pollution reduction measures and assesses them in terms of pollution reduction, acceptability, cost effectiveness and feasibility. The last review was in 2017. The summary was that: 'There are no clear cut highway infrastructure measure solutions to the problem because of concerns about either the deliverability of the schemes proposed, a lack of evidence that there would be any material improvement to air quality, or because of concerns about the likelihood of schemes generating a business case.'

However if 3,500 new dwellings are built just three miles down the A272, home to probably about 4,900 cars, even applying a fairly modest 1.4 cars per household, that is going to lead to greater congestion in Cowfold and can only increase the carbon emission readings. That would be in obvious conflict with statutory requirements and HDC's own Policy 35.

5. Still on transport links, a key plank of the Thakeham Homes presentation for Wealdcross would be the provision of 'significant transport infrastructure upgrades to local roads, including improvements to the A24/A272 junction and a grade separated junction to ensure the free flow of traffic along the A24.' At peak hours, there can be serious congestion at the Buck Barn traffic lights at the junction of these two roads. Clearly, that would be markedly worse if this scheme was ever to see the light of day and something like an additional 4,900 cars were making use of it, perhaps several times a day. We consider it would be a very dangerous solution to have just a single grade separated junction at Buck barn and do away with the traffic lights. It completely overlooks the function those lights serve at the moment for the existing junctions on to the A24 all the way between Ashington and Southwater, including the 28 gaps in the central reservation.

They serve as a safety valve, particularly at the Junction with the B2135 turning to Partridge Green and the junction with Grinders Lane by the Old Barn Nursery at Dial Post as drivers using those junctions know that if they are patient, there will be a gap in the traffic caused by the lights to the north. There is the same affect for those using the roundabout on to the A24 at the south end of Southwater.

West Sussex Highways Department actively pursued a programme to improve the A24 between Ashington and Southwater about 20 years ago. It was still under discussion as recently as 2013, at which point it was shelved indefinitely for lack of funding. It involved three grade separated junctions, the first at Buck Barn, the second at the junction with the B2135 and the third as the junction with Grinders Lane at the south end of Dial Post. As and when they were completed, all 28 of the central reservations were to be blocked. It was never a case of dealing with the different junctions piecemeal. They were promoted as a coherent and linked package of measures and that is precisely how they should be viewed now. In 2009 they were going to cost almost £32m, with the Department of Transport providing just over £29m and West Sussex CC paying the balance. One imagines the cost now would be significantly higher. If Thakeham Homes can and will fund the whole scheme, or if Thakeham will fund the Buck Barn junction, with the funding the rest of the work, then we would be prepared to remove this objection (but not the others) although we would want to see the programme completed before the first house on the site was started.

We do accept the need for new housing. We cannot comment on the number that new housing should take because, as we write this, HDC have not committed themselves to any such number, but whatever it is, we believe strongly that it should not take the form of new garden towns and in particular, should not be located at Buck Barn for the reasons we have set out. We do though reserve the right to introduce further objections as we see fit.

Yours faithfully,

David Green

David Green
Chairman of Planning, West Grinstead Parish Council.