

RESPONSES TO THE HDC REGULATION 18 PUBLIC CONSULTATION

Chapter 4: Policies for Growth and Change

Strategic Policy 2: Development Hierarchy

nature of comment: object

summary: Partridge Green should remain as a medium village

comment: The proposed upgrading of Partridge Green from a medium to a larger village is one of only two such proposals and the other is from small to medium. No justification is offered.

When the 2007 Core Strategy was introduced, the first draft classified Partridge Green as a Category 1 Settlement (towns and villages with a good range of services and facilities as well as some access to public transport – capable of sustaining some expansion infilling and redevelopment). Representations were made that it should in fact be a Category 2 Settlement (villages with a more limited level of services which should accommodate only small-scale development or minor extensions that address specific local needs). These were accepted by HDC.

The classifications were reviewed in 2014 when the current HDPF was introduced. In the Settlement Sustainability Review, the summary as regards Partridge Green read: 'This settlement has a relatively young age structure for the District with more young adults (15-24 year olds) than in many other settlements. It has a number of local employment sites, although travel to work data indicates that most residents still travel outside the village for work. The village does however have a good range of local services and facilities, including a local primary school, a range of shops and a good range of community facilities, including recreation ground, village halls, 2 branch GP surgeries and recently created allotments. There also appears to be a strong sense of community with a number of local clubs and societies. There is an hourly bus route to the village.' The Key Sustainability Issues were identified as being: 'This settlement has a number of strong sustainability features, but its relatively isolated location and limited public transport mean that the settlement is strongly reliant on private car. There is a need to ensure that these local facilities remain viable. but high levels of development would result in an increase in unsustainable travel patterns.' The recommendation therefore was that the village be classified 'Medium Village'.

Basically, nothing has changed since that review, except, of course, that the other Large Villages have become larger so that the discrepancy between what one might think of as the obvious Large Villages such as Billingshurst, Henfield, Steyning and Storrington on the one hand and Partridge Green on the other, has become more pronounced.

Tellingly, in Policy 12: Strategic Policy – Retail Hierarchy and Town Centre First Principles, the retail Primary Centres are identified as Horsham Town, Billingshurst, Henfield and Pulborough and the Secondary Centres as Southwater, Steyning and Storrington. For some reason Broadbridge Heath does not come into either category despite having a major Tesco store and the Broadbridge Heath Retail Park. That leaves, Bramber and Upper Beeding, plus Partridge Green as the only ‘Large Villages’ which are not specifically mentioned in the Retail Hierarchy.

proposed change: revert Partridge Green to a Medium Village

Strategic Policy 2: Development Hierarchy

nature of comment: object

summary: the secondary settlement boundary of Littleworth is wrong

comment: for some reason the map of Littleworth also includes Jolesfield, which is an entirely separate community and nothing whatsoever to do with Littleworth.

proposed change: amend the secondary settlement boundary to remove Jolesfield

Chapter 5: Economic Development

Strategic Policy 6: Economic Growth

nature of comment: object

summary: land south of Star Road Industrial Estate is not viewed as a standalone new employment opportunity, but a key component of a strategy to build new homes on brownfield sites

comment: HDC has commented regarding this site: ‘3.9ha suitable for B1, B2 and B8 uses. This site could come forward as a standalone extension to Star Road Industrial Estate. There may also be potential, subject to landowner

agreement, for the relocation of sites on the Huffwood Estate, which could then be redeveloped for housing.’

This site was specifically identified by the West Grinstead Parish Neighbourhood Plan Working Group as a suitable site to relocate the commercial units currently occupying the Huffwood Trading Estate. Moreover, as it offered more space than was necessary for this purpose, it also offered the opportunity to relocate some of the older commercial units at the north end of Star Road, which in turn would free them for residential development and gradually see Partridge Green moving south using brownfield rather than greenfield sites. There was the potential for some net increase in the amount of commercial land, but it was never intended as a standalone site and indeed, if it was allocated on that basis, it might seriously undermine the strategy underlying the draft Neighbourhood Plan.

proposed change: Rephrase the comment to read: ‘3.9 ha suitable for B1, B2 and B9 uses. This site has the potential, subject to landowner agreement, to be used to relocate the units on the Huffwood Estate and further down the line, some of the units on the north end of Star Road Industrial Estate, which could then be redeveloped for housing. It also has the potential to provide some net gain in commercial space.’

Chapter 6: Housing

Paragraph 6.29 – Shortlisted sites

Land at Buck Barn, West Grinstead (Weald Cross)

nature of comment: object

summary: I am totally opposed to the allocation of this site as a strategic site

comment: my reasons for objecting so strongly are:

1. strategic development – In Policy 2 of the existing HDPF, there is the proposition that ‘to maintain the district’s unique rural character while 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 to ... focus development in and around the key settlement of Horsham, and allow for growth in the rest of the district in accordance with the identified settlement hierarchy ...’. This has mysteriously been lost in the consultation draft, hopefully for no better reason than no strategic sites have thus far been chosen. One would like

to think that it would reappear in the second draft because climate change surely requires that we locate new development close to where people work, or close to where they can access a public transport system that will take them to work, accepting that we live in the South East and many have to commute.

2. countryside protection – access to and enjoyment of the countryside and all the facilities it provides are essential to our wellbeing. It has to be protected. Policy 28 states that: ‘Outside the built-up area boundaries and unclassified settlements, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to and justify its countryside location and must 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 informal recreation or d) enable the sustainable development of rural areas.’

Buck Barn would be ‘inappropriate development’. It would not be essential to, nor could it justify a countryside location and it could not satisfy any of the four criteria.

3. sustainable transport – new development needs to be located near to public transport and in particular, a good train service, accepting that a large proportion of local people still commute to work, whether to London, Crawley, Gatwick or elsewhere in the South East. Climate change requires that we do all we reasonably can to minimise our dependence on the motor car. Buck Barn would be at least 8 miles from the nearest train station. In practice, that would probably mean Horsham, as it has a better service than Christ’s Hospital and any park and ride is more likely to operate to Horsham.
4. air pollution – Cowfold is, of course, already an Air Quality Management Area. Currently, the level of pollution is just below critical levels. Building 3,500 new houses at Buck Barn would generate something like 7,000 more cars on local roads and a significant number of them would almost certainly travel east down the A272 to Cowfold. The effect would be to increase pollution levels, quite possibly above legal levels, placing HDC in breach of the law and exposing local residents to unacceptable risks.
5. road traffic dangers – the A24 between Ashington and Southwater has long been recognised as a dangerous road, largely because it is one of the few major roads that retains gaps in the central reservation, 28 in

total. In 2005 there was therefore a scheme to build three new grade separated junctions and to close all of the 28 gaps. The junctions would have been at the junction with the A272 at Buck Barn, at the turn off to Partridge Green on the B2135 and at the Grinders Lane turn off at Dial Post. In the event, the scheme was a victim of the 2008 financial crisis. It was though revisited in 2011 when there was a Preliminary Design Report prepared by Amey for West Sussex County Council. It actually recommended a number of interim measures, but in the Study Group Report to the Cabinet Member dated September 2011 in relation to Gap Closures, it concluded:

‘With regard to the suggestion to close some of the gaps and restrict movements at the B2135 and Dial Post Junctions, the team notes that the only opportunities that are currently available to safely make u-turns and right-turns along the route are at Ashington and Southwater roundabout. Therefore, closure of some of the gaps could potentially result in an increased risk of accidents at the other gaps. Consequently, the long-term solution is to implement the approved A24 major scheme (involving the construction of 3 no. 2-level junctions at Dial Post, Partridge Green and Buck Barn junctions) prior to closing any of the central reservation gaps.’

At the moment, the Buck Barn traffic lights serve as a safety valve for any driver seeking to cross the A24 using one of the gaps in the central reservation. You know that if you are patient, there will be a break in the flow of traffic. Remove that and you will, at a stroke, increase the risks for drivers using any of the other gaps. You cannot therefore deal with the Buck Barn crossing without at the same time addressing the B2135 and Grinders Lane junctions. That would obviously have major cost implications and affect timing and deliverability. Effectively, it would probably rule Buck Barn out as a strategic site unless and until the Government finds the money to actually implement the original scheme with 3 2-level junctions.

proposed change: remove Buck Barn from the list of strategic sites

Land North East of Henfield (Mayfield)

nature of comment: object

summary: I am totally opposed to the allocation of this site as a strategic site

comment: my reasons for objecting so strongly are:

These would basically be identical to reasons 1 to 4 for Buck Barn, but adding at the end of 4 the words:

‘From Partridge Green’s point of view, many of those drivers who might otherwise pass through Cowfold may be tempted by the congestion in Cowfold at peak times to re-route through Partridge Green, either up Littleworth Lane to the A272 or west to the A24. Partridge Green already finds itself used as a rat run and the roads in the village are not really suitable for large volumes of vehicles. If Mayfield ever received the green light, there would inevitably be a major increase in traffic volumes. In fact, it is quite possible that Mayfield could have a more detrimental affect on Partridge Green than Weald Cross.

proposed change: remove Mayfield from the list of strategic sites

Smaller Sites – Options

Question 1 – Do you agree that smaller scale sites will also be needed to meet the Council’s housing requirements.

The answer has to be ‘yes’.

Question 2 – Will the approach of allocating land for over 50 homes in the Local Plan help to provide certainty of delivery, particularly in the short to medium term? Should there be a different threshold?

‘Yes’ as to the first element, but at a major cost. As to the second element, a threshold as low as 50 is going to completely undermine the whole neighbourhood planning process. The Local Plan is meant to be strategic. 50 is micro managing and severely curtailing the ability of local communities to determine how their communities grow. I would therefore be inclined to raise the threshold to 200 and leave smaller developments to neighbourhood plans.

Question 3 – Do you consider this approach will allow existing neighbourhood plans that are undergoing preparation to be completed and minimise the need for them to undertake a review in the short term, whilst allowing the opportunity for communities to do this if they wish? Do you have any suggestion for a different approach?

As mentioned above, I believe this approach will completely undermine the neighbourhood planning process, which is why I would raise the threshold to 200 and leave smaller developments to neighbourhood plans.

Question 4 – What are your views on the shortlisted sites and the proposed housing number for each settlement?

My response is particular to **Partridge Green**. Basically, 200 is far too many. There is a draft Neighbourhood Plan in existence which is centred on a brownfield development of Huffwood Trading Estate providing about 50 units. If that was seen to succeed, the longer term strategy would be for some of the older units on the north end of Star Road Estate to relocate to land south of Star Road and for those too to be developed for residential. That may be too long term to satisfy HDC's immediate needs. I know that the Neighbourhood Plan Working Group did therefore ask HDC for an indicative number in late 2018 and in early 2019 was given a figure of 110, which would therefore have required them to find another 60. For that to now increase to 200 would therefore amount to a doubling in a year and make a mockery of a figure, which was supposed to reflect the level of increase that would be required under the Local Plan review.

I accept that being realistic, Partridge Green will have to agree something, They cannot hope to escape with no allocation. I would suggest 100 on one or two sites at the most.

Strategic Policy 16 – Affordable Housing

nature of comment: support

summary: would be quite happy for 50% affordable housing provision perhaps on very large developments

comment: the current housing crisis is, in large part, due to the sale of council housing, without any strategy in place for its replacement. The gap has been filled by private investors, which has distorted the market. We have to have a major programme to build social/affordable rented homes and this is an opportunity to generate that. You should not therefore be watering down your policies in this regard. If anything, you should be strengthening them.

proposed change: see above