

Hearing Statement by Campaign to Protect Rural Henfield (CPRH)

- **Matter 9, Issue 2 – Whether the other sites (settlement site allocations) allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?**
- **Q5. Is Strategic Policy HA9: Henfield Allocation sound? a) HNF1?**
- **Q12. Is Strategic Policy HA16: Small Dole Housing Allocation sound? a) SMD1?**

1. Key Issues

The draft local plan is **not sound or legally compliant** due to the inclusion of HA9 (Sandgate Nurseries) and HA16 (Land West of Shoreham Road), which:

- Lack **justification** as appropriate strategies, ignoring reasonable alternatives.
- Are **inconsistent** with the National Planning Policy Framework and with the aims of the Local Plan itself, and thereby with relevant planning and other legislative requirements.
- **Conflict with** the ‘made’ Henfield Neighbourhood Plan 2017-2031 (HNP), undermining its long-term strategy and ongoing community efforts to implement it.

CPRH has made similar points in response to both the Regulation 18 consultation in 2020 and the Regulation 19 consultation in 2024 (see representations #1190231 and #1190267 in the evidence base). Representations from numerous individuals on HA9 (64 personal representations) and HA16 (66 personal representations), from the Henfield Parish Council (#1191014), the Upper Beeding Parish Council (#1191020, #1193087), the Shermanbury Parish Council (#1192785) and our MP (#1192423) all reinforce our position that HDC failed to consider properly the conflicts with the community-driven Henfield Neighbourhood Plan.

Including these sites in the local plan would disregard community aspirations and the Government’s neighbourhood planning agenda. It would significantly erode trust in the planning system and jeopardise public confidence in future community-led development efforts.

We focus our attention here on the specific problems caused by the two additional sites in Henfield but we are aware that other parishes also have concerns about the additional sites they have been allocated.

2. Site Allocation – Sandgate Nurseries

The sustainability assessments for the Local Plan are summarised in Document SD03a, an extract from which is shown in the table below. It can be seen that for the sites considered in Henfield, Sandgate Nurseries has the worst sustainability ratings with biodiversity and historic environment in particular scoring poorly.

The potential for developing Sandgate Nurseries was also assessed in detail for the Neighbourhood Plan. The decision not to allocate it was based on an assessment that multiple harms could not be fully mitigated. Indeed, development there would undermine the core objectives of the plan which took so many years of effort to develop and was supported by over 90% of voters in the referendum.

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
SA005 (residential – 100 dwellings)	++	++/-?	0	0?	++	0?	-?	-?	-	-?	0	-	+	0	+	0	+
SA011 (residential – 30 dwellings)	++	++/-?	0	0?	++	-?	-?	-?	-?	-?	0	-	+	0	+	0	+
SA065 (residential – 25 dwellings)	++	++/-?	0	0?	++	0?	0?	0?	-?	-?	0	-	+	0	+	0	-
SA317 (residential – 55 dwellings)	++	++/-?	0	0?	+	-?	-?	-?	-	-?	0	-	+	0	+	0	-
SA504 (residential – 10 dwellings)	++	++/-?	0	0?	+	-?	-?	-?	-?	-?	0	-	+	0	+	0	+
SA686 (residential – 205 dwellings)	++	++?	0	0?	++	-?	-?	0?	-?	-?	0	-	+	0	+	0	-
GA011 (Gypsy and Traveller use)	++	-?	+	0?	-	-?	?	0?	+	-?	0	0	+	0	+	0	-

Summary of the likely sustainability effects of the small site options considered for the Horsham District Local Plan as per July 2021 (extracted from Table 4.5 in SD03a, p68-69)

Allocating Sandgate conflicts with the stated sustainability aims of the proposed local plan, making it inconsistent to include Sandgate when more appropriate sites are readily available.

Figure 1 below illustrates visually how the HNP is firmly founded in the physical geography of Henfield. The spatial strategy (Policy 1) of the plan is to focus housing development in the more accessible areas to the north and east of the village, while protecting the central Henfield Conservation Area from more traffic and congestion, attracting visitors to the walking trails around the south-west of the village to grow Henfield’s tourist economy, while protecting the rich wildlife sustained by the river floodplain. Developing the Sandgate Nurseries site would run counter to all these policies.

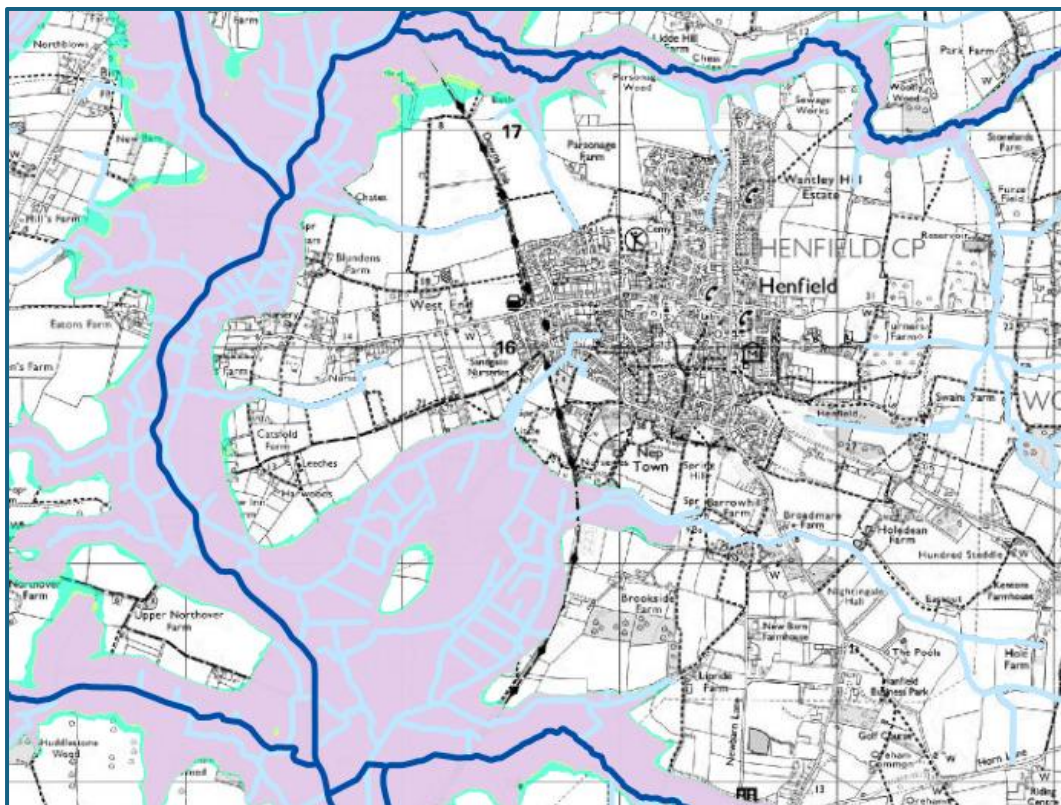


Figure 1: Extract from map CC03 SFRA-Appendix-1-Figure-9F-CC showing the location of Henfield relative to the River Adur, its Floodplain and the Downs Link trail

Our village is in the middle of implementing the Neighbourhood Plan, which continues until 2031. We have already launched the Horsham Heritage Trails, one of which passes alongside the Sandgate Nurseries site and we are currently developing the accompanying birdwatch trail. These, and many future plans, would be ruined by a new housing development at Sandgate Nurseries.

The proposed Local Plan unnecessarily allocates all the sites needed for a 17-year period upfront, based on the availability of land that was being promoted for development back in 2017. This not a requirement of the NPPF, which under Paragraph 69 allows for a more dynamic approach requiring specific allocations only for the first 5 years and broad locations for growth beyond that.

The developer responses to the Reg 19 consultation show that over 1800 more houses are being proposed in Henfield, equivalent to a 67% increase in the site of the village. Some of these are already proceeding to planning application, eg. Croudace 190-215 houses with potential to extend to 450 (#1191683). Clearly, alternative options to developing Sandgate are available.

There is a current planning application for Sandgate Nurseries (DC/23/0189) for 82 units. The Sandgate site has already been subject to multiple refused planning applications and dismissed appeals during which the arguments for and against development of the site have been well rehearsed. What has become clear is that development would cause a range of harms which can, at best, only be partially mitigated. The main conflicts are summarised below.

Heritage

NPPF Paragraphs 196-197 set out the requirements not only to protect irreplaceable historical assets but to sustain and enhance their significance in a wider social, cultural, economic and environmental setting. The report EN09, Cultural Heritage Desk Based Assessment Part B– Sites Identified for Potential Allocation for Housing Development identifies a number of harms that cannot be completely mitigated at Sandgate.

The rural setting of Camilla Cottage plays an important role in enhancing its special historic and architectural interest. This is the only remaining double-sided loose farmstead to survive in Henfield, a locally distinctive pattern of development once typical of the Low Weald which gives it particular value. The distinctive, historic farmhouse would be incorporated into an urban residential expansion, resulting in no visual or physical separation between the farmstead and the village. This would compromise its historic relationship with Henfield and the wider landscape.

The sunken Hollands Lane, which runs along the southern edge of the site, is a real exemplifier of local rural character, being a particularly undamaged stretch of the historic route to Bineham Bridge, in existence from at least 1548 (de Candole, 34-6), with fine views to the south and nicely marked at its transition from paved to unpaved by one of the oldest trees in Henfield, a veteran oak. It forms part of the new 'River History and the Rise of Henfield' heritage trail but its character would be transformed by the proposed development. The report recommends that "Consideration should be given to the cumulative impact of development on the overall landscape and historic character of the locality."

The report also recommends that "Any entrances to the site should be minimal in form and reflect the rural character of this part of West End Lane." What is proposed by the developer is

an incongruous chicane arrangement with speed bumps to reduce vehicle speeds and manage the conflict with traffic emerging from the junction with the Bishop Park estate.

It is suggested that the “The western boundary of the site should retain a green edge” but there is no defensible boundary with the adjacent land which has already been brought forward for potential housing development.

Access to the site would necessarily be from the High Street through the Henfield Conservation Area where there are over 60 listed buildings (see Figure 2). The report says: “it is acknowledged that development may have an effect on these heritage assets through unplanned impacts of development such as increased traffic, and changes to their wider environment”.



Figure 2: Henfield Conservation Area showing nationally listed buildings (from Conservation and Management Plan 2019)

Aside from the issues that this creates for the road traffic, it also affects both residents and visitors. Residents find it hard to relax in their homes knowing that their car may be damaged at any moment. Visitors cannot wander freely about enjoying the views and the architectural heritage. There are concerns that timber framed houses by the roadside are being damaged by the vibration of heavy lorries and delivery vans going to the new developments.

The increase in traffic is clearly already having an adverse impact on the character of the Conservation Area and the ability of the public to enjoy it. The noise and the hurried traffic spoil the relaxed and tranquil ambience that was present just a few years ago. Building another 82 housing units on West End Lane can only aggravate the harm being caused to the character of this designated heritage area and lead to further deterioration in the quality of life for residents and loss of the benefits for tourism and Henfield’s visitor economy.

The “bus stops” in Station Road are actually at the bus depot where the 17 buses will pick up passengers as they leave early in the morning. There is currently no return service. Two buses a day, leaving in the morning with no return service is hardly a viable transport service.

Biodiversity

NPPF paragraph 185 says that: *To protect and enhance biodiversity and geodiversity, plans should:*

- a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

The studies that have been done on biodiversity at Sandgate have only looked at what happens within the site. They have not taken account of wider impacts on the village as a whole and the conflict with the NHP. Hollands Lane is one of the main green entryways to the village, connecting from/to the paths along the river to Ashurst.

Building here disrupts the green corridor which we are trying to create as part of the Horsham's nature recovery programme. It also directly affects the birdwatching trail we are developing by disrupting the birds' habitat. Both Hollands Lane and West End Lane have been identified in the 2021 HNP as significant wildlife corridors.

This area is identified as an Opportunity Area for biodiversity, which is a priority area for restoration and creation of biodiverse habitats. There are patches of Priority Deciduous Woodland which can be potentially reconnected.

Offsetting the biodiversity loss somewhere else will not save the rare species recorded on site, such as the Brown Hairstreak butterflies which are not even mentioned in the land promoter's ecological submission. The Brown Hairstreak is one of Britain's rarest butterflies and the field lies within the Priority area for Countryside Stewardship measures to conserve it

3. Small Dole

The HDC Settlement Sustainability Assessment for Small Dole classifies it as a Small Village. The lack of key services such as education and medical facilities does lead to a reliance on larger nearby settlements and unsustainable travel patterns. Potential for housing development is therefore limited.

On 12th April 2017 a Memorandum of Understanding was signed between Henfield and Upper Beeding Parishes. It was agreed that planning needed to take into account the overall sustainability and size of the settlement and resolved that the two Neighbourhood Plans must not 'over-allocate' sites for the small village of Small Dole.

The decision taken and widely consulted-on in each parish, was to limit large site development to one site only in Small Dole, namely Oxcroft Farm (within Upper Beeding parish). Both Neighbourhood Plans are now 'made'.

Policy HA16 Land West of Shoreham Road thus conflicts directly with both the Henfield Neighbourhood Plan and Upper Beeding Neighbourhood Plans. It is government policy and HDC's stated aim to give real weight to Neighbourhood Plans and community wishes. The Reg

19 Local Plan undermines these aims and is inconsistent with HDC's own policies on sustainability of settlements.

4. Proposal

NPPF Paragraph 69 requires planning policies to identify a supply of "specific, deliverable" sites for five years following adoption of a Plan and "specific, developable sites or broad locations for growth" for years 6-10 and, where possible, years 11-15 of the Plan period.

CPRH proposes that the Local Plan should be phased so that not all the housing development comes forward at once. The first phase could include all the housing sites already allocated in current neighbourhood plans.

The subsequent phase could specify the number of houses to be built through additional allocations to be brought forward under future updates of the Neighbourhood Plans. An ample supply of alternative sites is available to avoid developing HA9 Sandgate Nurseries or HA16 Land West of Shoreham Road. This would allow time for meaningful consultation about future site allocations so that sites could be brought forward that align with both community wishes and the policies of the NPPF. It allows the HDC to meet its pledge to continue to work with Parishes on supporting the preparation and review of Neighbourhood Plans. It would also make the Local Plan dynamically responsive to changing circumstances during the lifetime of the Plan.