

HENFIELD NEIGHBOURHOOD PLAN

CRITICAL ANALYSIS OF SITE ASSESSMENTS

SITE C – WSCC LAND WANTLEY FIELDS

Access to public highway - yes

You have identified Site C – WSCC Land Wantley Fields for development and have illustrated the provision for suitable access on the map provided. However this runs straight through the area you have also clearly identified as green spaces (identified on your green spaces map as No 20)

Policy 11: Local Green spaces

You state the following regarding the importance of local green spaces.

P11.1 the following sites, as shown on Map of Local Green Spaces, page 54, (Site 20) are designated as Local Green Space

P11.2 Proposals for development in a designated Local Green Space will be resisted, unless they are ancillary to the use of the land for a public recreational purpose or are required for a statutory utility infrastructure purpose.

5.82 This policy designates Local Green Spaces in the Parish, to be protected from development by the designation in accordance with the NPPF.

5.83 In each case, the designated green space is an integral part of the Parish and is therefore regarded as special to the local community. The HNP Local Green Spaces study (in the evidence base) sets out the case for each site to be designated. Once designated, the policy will resist all proposals for development unless it can be clearly demonstrated the development is ancillary to a public recreation use or is required utilities' development

5.84 In addition to the protections already afforded to green infrastructure assets such as historic commons and ancient woodlands, the HNP recognises the value of smaller, green assets dispersed across the Parish.

Despite the declaration made above there appears to be a significant conflict between proposals for suitable development sites and establishing and protecting green spaces.

Landscape

Horsham District Landscape capacity study April 2014 Categorisation

You state **Site C assessment:** Part of area 69: Low/moderate capacity for medium scale development (100-500 homes)

This assessment is incorrect and inconsistent. The Landscape capacity study map zone 7 clearly shows that area 69 has No/Low capacity and it is only area 70 that has Low to moderate capacity.

It also conflicts with your own policy 11 Local green spaces

HENFIELD NEIGHBOURHOOD PLAN

SITE ASSESSMENT

SITE K 1 – LAND AT FURNERS LANE

You state in your assessment under the headings:

Conformity with local plan strategic policies

HDPF Policy 4 criteria 1 and 5 supports the expansion of settlements where: 1) The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge and (5) The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.

However you then state this site “**is not attached to the existing or revised development boundary**” and would extend development into open countryside with no defensible boundaries. It is therefore contrary to HDPF Policy 4 criteria 1 and 5.

This assessment is incorrect, as you have chosen to split the land into two separate areas “KI & K2” which distorts the reality, as K1 & K2 are all part of the same site recognized in the SHELAA ref: Part of SA005 Which is also clearly identified on the current Landscape capacity study map (area 70 zone 7 Henfield) which also clearly illustrates that this is the only land **with low/to moderate capacity for development**. Therefore this site does adjoin the existing settlement edge and the development is contained within an existing defensible boundary and the landscape and townscape character features can and will be maintained and enhanced and the site does offer significant opportunities.

Opportunities The assessment therefore ignores the opportunities this site offers such as: Retirement housing- Build to rent housing - Affordable housing - Market housing- Community facilities- Open spaces

Summary of sustainability

You have provided a detailed assessment of the neighbouring site C – WSCC Land at Wantley fields as outlined. “The site has been put forward to provide recreational space and housing. It is a greenfield site outside of the settlement boundary and it is proposed to contain a large area of retained open countryside/vegetative buffer, restricting built development to the south western corner of the site to be in line with new development to the south along Fillery Way. This will reduce the potential for negative impact on Objective 9. By limiting development in this way, the site’s performance against objectives in relation the countryside is improved. This approach ensures that the housing will be well screened from the countryside beyond by mature trees and hedging. The provision of housing provides a strong positive impact on Objective 4 and its location adjacent to Henfield will also have a strong positive impact on Objective 3 through the provision of recreational space for use by the wider community.”

The assessment is incorrect and inconsistent as you have failed to carry out an accurate assessment of Site K1 which neighbours Site C WSCC Land and has very similar characteristics and also offers “**The provision of housing providing a strong positive impact on Objective 4 and its location adjacent to Henfield will also have a strong positive impact on Objective 3 through the provision of recreational space for use by the wider community**” and you have failed to acknowledge this.

HENFIELD NEIGHBOURHOOD PLAN

SITE ASSESSMENT

CONTINUED SITE K 1 – LAND AT FURNERS LANE

Surrounding Land uses. You state countryside all around site with farmsteads to the southeast. This assessment is incorrect as this site is part of the same site as K2, which are all part of the same site recognized in the SHELAA ref: Part of SA005

General Character – open countryside/edge of settlement/urban. You have assessed this site as open countryside yet site C WSCC you have assessed as “rural in character on the site but edge of settlement”. Your assessment of site K1 is incorrect and inconsistent with the landscape capacity study as this site is part of the same site K2, which neighbours site C and shares the same/similar characteristics being “rural in character but edge of settlement”

Opportunity to provide open space/recreation/community facility You state none proposed. This is incorrect as there will be plenty of opportunity for open space/recreation and community facilities.

Opportunity to enhance biodiversity and green infrastructure You have stated this to be NO. This is incorrect, as the site will include a number of enhancements to the biodiversity & green infrastructure including recreation facilities.

Transport

Access to highway You have stated access to highway via Furner’s lane, which is a narrow country lane at this point.

This information is incorrect. The access will come via the existing access of the recent Meadow walk development (Croudace), which adjoins Site K2 & K1.

Pedestrian access You state no pavement along Furner’s lane.

This is incorrect as pedestrian access would be via the recent meadow walk development.

Public rights of way You have stated yes, public footpath on eastern boundary.

This is incorrect as there are no public footpaths or public rights of way on this site.

Surface water flood issues You have stated: High, medium and low surface water flood risk on boundary between K1 and K2 with some low risk extending eastwards into site K1

This is incorrect. The area you are referring to does not flood and any surface water retained is only as a result of heavy farm machinery causing deep tyre trenches that retain water on a heavy down pour, which would be eliminated once the site is developed.

HENFIELD NEIGHBOURHOOD PLAN

SITE ASSESSMENT

SITE K 2 – LAND AT FURNERS LANE

Conformity with Local Plan strategic policies You state HDPF Policy 4 criteria 1 and 5 supports the expansion of settlements where: 1) The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge and ⁽¹⁾~~(SEP)~~5) The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.

You acknowledge Site K2 – Land at Furner’s lane “**is attached to the revised development boundary**” However you then go on to state this would extend development into open countryside with no defensible boundaries. It is therefore contrary to HDPF Policy 4 criteria 5.

Yet in your assessment of the neighbouring site C WSCC Land. You made the same assessment and acknowledged the site adjoins the existing settlement and went on to state **the “development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced”**.

This assessment is incorrect and completely inconsistent with your assessment of the neighbouring site C WSCC land “which possesses very similar characteristics” relating to the containment within existing defensible boundaries and your own acknowledgment that it is attached to the revised boundary.

Summary of sustainability appraisal Large site on the eastern side of Henfield which projects into open countryside beyond the line of new development along Fillery Way. Greenfield site outside of the settlement boundary which gives rise to a number of negative impacts on SEA Objectives including the environment, countryside, biodiversity and character. However, it is considered that these impacts would be localised to the immediate area and new screening would reduce these impacts. Accessibility may also present an issue.

The site would provide a considerable contribution towards the housing need.

You stated in Comments made to Site C WSCC Land Wantley Fields as outlined below

HENFIELD NEIGHBOURHOOD PLAN

SITE ASSESSMENT

CONTINUED SITE K 2 – LAND AT FURNERS LANE

Summary of sustainability appraisal for site C WSCC Land Wantley Fields compared to site K2

The site has been put forward to provide recreational space and housing. It is a greenfield site outside of the settlement boundary and it is proposed to contain a large area of retained open countryside/vegetative buffer, restricting built development to the south western corner of the site to be in line with new development to the south along Fillery Way. This will reduce the potential for negative impact on Objective 9. By limiting development in this way, the site's performance against objectives in relation the countryside is improved. This approach ensures that the housing will be well screened from the countryside beyond by mature trees and hedging.

The provision of housing provides a strong positive impact on Objective 4 and its location adjacent to Henfield will also have a strong positive impact on Objective 3 through the provision of recreational space for use by the wider community.

You state in your summary of sustainability appraisal for site C WSCC Land Wantley fields “The provision of housing **provides a strong positive impact on Objective 4 and its location adjacent to Henfield will also have a strong positive impact on Objective 3 through the provision of recreational space for use by the wider community.**

Your assessment of Site K2 is incorrect and inconsistent, as you have stated it is outside of the settlement boundary even though you have acknowledged site K2 adjoins the revised settlement boundary and have acknowledged Site K2 will provide open spaces. You have also failed to include that Site K2 provision of housing will also provide a strong positive impact on objective 4 and its location adjacent to the revised settlement boundary will also have a strong impact on objective 3 through the provision of recreational space for use by the wider community, Yet you have failed to include this in your assessment.

General Character – open countryside/edge of settlement/urban You assessed Site C WSCC Land at wantley as “**Rural in character on the site but edge of settlement.** You then assessed the neighbouring land Site K2 Land at Furner's lane simply “**open countryside**”

This assessment is again incorrect and inconsistent and choses to ignore that Site K2 is also “**rural in character and on the edge of the settlement**”

Record of protected species/habitats Your assessment is again inconsistent. You have chosen to list only .2 species for the neighbouring land Site C WSCC Land and 9 species on your site assessment of site L Land at backsettown the other neighbouring site. Yet you have listed 16 species for Site K2 site which has similar bio-diversity characteristics.

Opportunity to enhance biodiversity and green infrastructure Your assessment of site K2 as “None proposed”

This assessment is incorrect and inconsistent, as you have already acknowledged open spaces will be provided, as will recreation facilities.

HENFIELD NEIGHBOURHOOD PLAN

SITE ASSESSMENT

CONTINUED SITE K 2 – LAND AT FURNERS LANE

Landscape

Horsham District Landscape capacity study April 2014 Categorisation

Site K2 Assessment: Part of area 70: Moderate capacity for medium scale development (100-500 homes).

This assessment ignores the fact that this is the only land identified in the landscape capacity study that has any capacity for medium scale development.

Surface water flooding issues

Your assessment: High, medium and low surface water flood risk on boundary between site K1 and K2

Your assessment is incorrect as the surface water you are referring to is as a result of deep trenches caused by heavy farm machinery accessing the fields, which will be eliminated once developed

Contaminated Land (usually applies to brownfield sites)

This assessment is inconsistent with your assessment of site C, as you have stated Site K2 is “Greenfield” yet your assessment of Site C ignores that it is also a “Greenfield” site

HENFIELD NEIGHBOURHOOD PLAN

SITE ASSESSMENT

SITE X PARSONAGE FARM – WELLBECK STRATEGIC LAND

Plan strategic policies

Whilst this site does adjoin the development boundary, it would extend development into open countryside with no defensible boundaries. It is therefore considered to be in conflict with Policy 4 criteria 5.

Summary of Sustainability Appraisal

This site gives rise to a number of greater negative impacts on SEA Objectives, particularly those relating to the countryside and environment. The site is on the northern side of Henfield and therefore impacts upon the National Park are all less than new housing proposals would be in other parts of Henfield. The provision of housing provides a strong positive impact on Objectives 3 and 4 **although again the distance from the High Street is noted.** The site also has relatively good accessibility and its development would result in minimal impacts on the surrounding community resulting in a possible positive impact with regard to Objective 6.

This assessment is incorrect and inconsistent as it states that the “ impacts upon the National Park are all less than new housing proposals would be in other parts of Henfield”. Even though this site is far more highly exposed to the national park and indeed the main A281 coming into Henfield from the North than better alternative sites such as Site K1/K2 SHLAA REFERENCE SA005 land at Furner’s lane. Also identified in the most current landscape capacity study “As the only land identified to have low/moderate capacity for housing.

The assessment also fails to mention a new access will be required onto the A281 which will give rise to a number of negative impacts.

Although the assessment acknowledges the distance from the high street, How is it then Site X Parsonage farm has been selected ahead of Site K1 Furnace lane, considering Site X Parsonage farm is almost three times further away from the village centre than Site K1 furnace lane site and is only 250 metres closer to the village centre than the west end lane site. Site K1 furnace lane is significantly closer than both West end lane and Parsonage farm by some considerable difference.

Approximate distances of proposed sites from centre of village

West End lane = 1300 metres

Site X Parsonage Farm = 1062 metres

Site K1 Furner’s Lane = 368 metres

HENFIELD NEIGHBOURHOOD PLAN

SITE ASSESSMENT

CONT: SITE X PARSONAGE FARM – WELLBECK STRATEGIC LAND

HPC response to application DC/09/1222 Development of 130 dwellings Deer Park

“10) Some residents attending the Public Meeting are concerned regarding the adverse affect on the environment a development of 130 dwellings would have. Flooding is one of these concerns, Henfield being in close proximity to the River Adur, which flows to the West of the proposed development. The river is tidal and when a high tide occurs at Shoreham simultaneously with heavy rain within the region, flooding occurs around Henfield albeit not within the immediate vicinity of the proposed development. Industrial and domestic development (primarily within the Burgess Hill area) over the past 25 years has created a run off of rainwater into the river and this has increased the problem of flooding. Council considers further development is likely to increase flooding. The loss of more agricultural land and open space, which allows flood water to soak away, coupled with the many underground springs that can be found within the Parish, can only add to this problem”.

Considering HPC and residents comments and concerns to the development of 130 dwellings at Deer park and also Considering the drastic effect of climate change forecast in the very near future why would you allocate land for development close to a flood zone and a river when you have better alternative sites available that are not as close to either a flood zone or river?

OBJECTION: LANDSCAPE Ignores the assessment of the Horsham District Landscape capacity study April 2014 where it clearly identifies area 69 of which this site falls within has NO/LOW Capacity

OBJECTION: Proposed site is less than 250 metres from river

OBJECTION: Furthest from village centre

OBJECTION: New Access onto A281 required

OBJECTION: Close to an Area of ancient woodland approximately 120m to the north of the proposed site

OBJECTION: Ignores duty to find better alternative sites