

PART A	Your Details
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Position (if applicable)	
Date	18 December 2019

PART B

To which part in the plan does your representation relate?

Paragraph Number: Various	<ul style="list-style-type: none"> • Site Assessments • SEA/SA final report and addendum • Environment and Countryside Report 	Policy Reference:	
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:
The draft plan fails to take fully into account the decision from the recent Sandy Lane Planning Inquiry (Appeal Ref APP/Z3825/W/19/3227192) which concluded that development of Site F is not sustainable. We attach a document giving our comments and suggested improvements.
What improvements or modifications would you suggest? See attached

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

Do you wish to be notified of the local planning authority's decision under Regulation 19 of the Neighbourhood Plan (General) Regulations 2012 (as amended) in relation to the Henfield Neighbourhood Development plan?

Please tick here if you wish to be notified:

CPRH Comments on the Proposed Henfield Neighbourhood Plan.

Implications of the Sandy Lane Planning Inquiry Decision for the Henfield Neighbourhood Plan

Site F, the Land North of Sandy Lane, has recently been the subject of a planning appeal and a public inquiry (Appeal Ref APP/Z3825/W/19/3227192) where development proposals were dismissed by the inspector as not sustainable. Much new evidence was presented to the inquiry, including detailed landscape and heritage assessments. Extracts from the Appeal Decision are appended to illustrate the inspector's views on the impacts such development would have on the landscape setting and character of Henfield and on the adverse effects to nearby heritage assets.

We note especially his conclusions that:

- the harm to landscape character and visual harm would be of particular significance in this case (*Paragraph 56*).
- overall environmental matters weigh against the proposal (*Paragraph 72*).
- considerable importance and weight must be given to the desirability of preserving the setting of the listed buildings (*Paragraph 75*).
- building 42 houses here would not represent sustainable development. (*Paragraph 77*).

Given that the appeal was fought by Horsham District Council with full support from Henfield Parish Council and the Henfield community, it is important that the material points made in the inquiry are fully reflected in all the relevant documents of the Henfield Neighbourhood Plan as these may be referred to in the event that required housing numbers are changed again in the future.

CPRH considers that the implications of this landmark decision and the detailed reasons for the dismissal, have not been fully taken into account in the updated Site Assessments and consequently are not reflected in the Sustainability Assessments of the site options and other associated plan documents. Detailed suggestions are made below.

Comments on the Site Assessments in the Evidence Base

Section 3.0 explains that the observations and judgments in the Site Assessments were made by the planning consultants either on site visits or by reference to available documentation such as landscape assessments.

Section 1.3 explains that when the Neighbourhood Plan undergoes public consultation, interested people will have an opportunity to challenge or provide updated evidence to inform this Site Assessment, which will be reviewed as necessary.

The text of the Site F assessment (Page 39) has been duly updated to incorporate a section on the Appeal Decision under the heading *Constraints and potential mitigation* but the assessment still contains earlier text which is now clearly inappropriate.

It is important that the material points made in the inquiry are fully reflected in the updated site assessment so that the Evidence Base is sound in the event that additional housing requirements are brought forward.

The following points in particular need to be addressed:

- The proposal in the Site Assessment still states 42 dwellings. **The inspector considered that 42 houses cannot feasibly be accommodated on the site.** This has consequences for the

Sustainability Assessment of the site (Page 32 - Final SEA_SA Neighbourhood Plan June 2019b) as discussed below.

- The site assessment states that “A visual landscape impact assessment is required as part of any proposal. Any scheme will be expected to minimise the visual impact and enhance the character of the locality.” The public inquiry actually considered in depth two specialist landscape assessments and a detailed critique of their methodology, leading the Inspector to the conclusion that **any such housing scheme in this location would be detrimental to the visual amenity and character of the area.**
- At the bottom of Page 39 there is still an opinion expressed that “Impacts in the landscape and heritage would be lessened should the lower westward end of the site come forward with the higher eastern end remaining as open space”. This comment is inappropriate in light of the Planning Inspector’s detailed critique in his dismissal of this site at appeal in August 2019. A similar option was also considered by a Planning Inspector at the Local Plan Inquiry in respect of the Horsham District Local Plan 1997. That Inspector concluded that the site was not suitable for such development due to its particular characteristics and setting. He commented that:

“The objector proposes the development of the north western part of the site (about 1 ha) with the remainder being landscaping or public open space. Although the suggested housing would occupy the lowest part of the site, I consider it would result in a prominent extension of the built up area into the countryside. The recent housing at Chanctonbury View relates well to the pattern of development to the west, along Lower Station Road and Dropping Holms, and is not unduly intrusive in views towards the village. The proposal would represent an incongruous extension of this relatively inoffensive development, beyond what I consider to be a well defined boundary of the built up area. Trees to the west and rising ground to the east would afford some degree of screening but would not effectively reduce the seriously harmful effect of the proposed development on the wider countryside to the south and south west.”

CPRH therefore submits that the final paragraph at the bottom of page 39 is misleading and should be removed from the site assessment and the sustainability assessments.

There was much discussion during the Sandy Lane Planning Appeal about the importance of the nearby Downslink as a visitor attraction and source of tourists coming to Henfield. This will soon be enhanced by incorporating part of the Downslink into one of the new village Heritage Trails currently being developed. The importance of tourism is recognised in the proposed Neighbourhood Plan (Community Aim 3, Section 5.51, Page 44) but **the specific role and importance of the Downslink is not acknowledged and deserves to be highlighted.** CPRH is currently researching ways in which the Downslink can be formally designated as an asset worthy of protection.

This has implications for the assessments of the nearby sites. For example, the assessments for Sites F, H and R all cite as an “opportunity”: *“The inclusion of a cycleway linking the Downs Link to roads which lead to the village centre to support our plans to improve visitor numbers.”*

The village is actively working to create an integrated network of cycleways but these particular proposals are unhelpful. Site F already enjoys cycle access to the nearby Downslink along the adjacent Sandy Lane. Sites H and R are actually adjacent to the Downslink which is itself a cycleway linking to the village roads. **Building new houses alongside or close to the Downslink or any of these existing cycle routes would be to the severe detriment of the rural character.** It is likely to deter visitors who come seeking to enjoy the countryside and open views from the Downslink. The usage and utility of the cycle routes would therefore be much reduced by development of

these sites. **Development here represents a threat to village tourism rather than an opportunity and should be reflected negatively in the Site Assessments.**

Comments on the Sustainability Assessments

The sustainability assessments for the sites have not been updated to reflect the detailed analysis and new information resulting from the public inquiry comprehensively conducted over a 4 day period including an in-depth site visit during August 2019. **The Sustainability Assessment for Site F on page 32 still assumes 42 houses despite the inspector's conclusion that this would not be sustainable development.**

Assessing the 'Appropriate Amount of Housing' (Objective 4) as 'green' is in conflict with the inspector's conclusion as the site cannot sustainably contribute the necessary quantum of housing.

Similarly, the **assessment of environmental impacts (Objective 10) as being possibly slightly negative (amber) clearly disagrees with the inspector's conclusions and should be revised to a negative impact (red).**

Thus amendments need to be made in relation to Site F in terms of lowering SE/SEA scores against objectives 4 and 10 as well as the textual summary on Page 32 - and also to the summary scores for Site F on Page 51 of the Final SEA_SA Neighbourhood Plan June 2019b - to reflect the Planning Inspector's views that Site F does not represent sustainable development.

These changes would give Site F an overall sustainability score of red rather than amber in the map on Page 52.

The site scores in turn feed through into Options 1, 6 and 10 which also need to be revised:

- Option 1 on page 53 still cites 42 houses.
- Option 6 provides for 30 houses on Site F, noting that "the topography of the site may have landscape impacts on the wider countryside but this could be lessened through careful design and landscape mitigation. Impacts in the landscape and heritage could be lessened should the lower westward end of the site come forward with the higher eastern end remaining as open space". As discussed above, limiting the development in this way would not overcome the harm to landscape character and setting.
- The new option 10 (in the Addendum to the Sustainability Appraisal dated 22nd October 2019, page 26) reverts to proposing 42 houses on site F exactly as before.

Thus, options that include site F, ie, Options 1, 6 and 10, need revising given the reasons for the inspector's recent appeal dismissal. We suggest that, as a minimum, objective 4 should score amber and objective 10 should score red. This reduces the acceptability of these three options and thereby strengthens the choice by the Steering Group of Option 5 as the way forward.

CPRH would challenge the statement on page 94 of the SEA/SA report that "any of the options (subject to mitigation which would be expected through planning policies, conditions and so on) would contribute to achieving sustainable development." **It is clear from the appeal decision that Site F is not amenable to mitigation and development here is unsustainable. This would rule out options 1, 6 and 10 from future consideration.**

Comments on the Local Green Space Proposals

The proposed Neighbourhood Plan designates a number of Local Green Spaces under NPPF 2019 Section 99, which says: *“The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them.”*

The criteria are: *“The Local Green Space designation should only be used where the green space is:*
a) in reasonably close proximity to the community it serves;
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
c) local in character and is not an extensive tract of land.”

The HNP Environment and Countryside Report 2018 originally proposed (in Annex G2) a designated Local Green Space along the verge of Dropping Holms:

“Green space 23 is the Verge East of Dropping Holms / Sandy Lane, Henfield Approx 0.03 Ha. It is a Narrow Verge of Road with view to and from the South Downs National Park. It is the only such view from the village”. See map below.

This Local Green Space proposal was subsequently withdrawn amid concerns that the designation of a local green space at that time might impede housing development on Site F. There is no longer any such proposal, however, and as the Sandy Lane Planning Appeal decision makes clear, the site would not be suitable for such development.



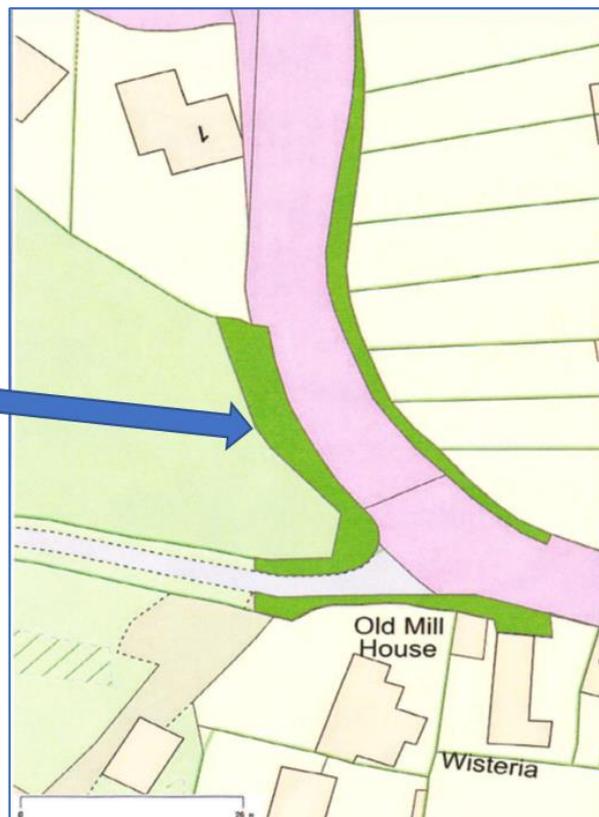
Above: Proposed designated Local Green Space

CPRH believes that this Green Space is of particular importance to the local community and should be reinstated in the Neighbourhood Plan. In proposing this we note that:

- The location provides a unique viewpoint of the South Downs which is much enjoyed by the people of Henfield, particularly for viewing sunsets.
- As per Section 5.81 of the proposed Neighbourhood Plan, extensive views to/from the South Downs and Chanctonbury Ring contribute to the rural setting of Henfield as a Downland Village.
- It is adjacent to the Grade 2 listed Old Mill House and Wisteria Cottage and would enhance the setting of these cottages.
- A heritage trail currently under development will run right past this point.
- This Green Space connects directly to and extends the hedgerow and wildlife corridor along Sandy Lane highlighted in Section 5.83 of the proposed Neighbourhood Plan.
- A new bench, provided by the community, is to be installed by the Parish Council on the east side of Dropping Holms to allow people to take advantage of the viewpoint.
- The location would be a convenient resting point for visitors coming from the Downs Link up Sandy Lane.
- There is an opportunity, noted in the Site Assessment for Site F, to provide open space/recreation/community facility by enhancing the verge with reinforced boundary planting and open space adjacent. CPRH volunteers would be happy to help with this work.

The location is shown more clearly in the Parish online system used by Henfield Parish Council, as indicated in the figure below.

Proposed
Local Green Space



Conclusion

The Campaign to Protect Rural Henfield broadly supports the proposals in the submitted Neighbourhood Plan subject to:

- fully recognising and incorporating the implications of the recent Sandy Lane appeal decision into the documents
- modifying the site assessments and sustainability assessments accordingly
- taking advantage of the new opportunity to reinstate the Local Green Space by Dropping Holms.



CAMPAIGN TO PROTECT RURAL HENFIELD

**Appendix: Extracts from the Sandy Lane Appeal Decision Notice,
REF APP/Z3825/W/19/3227192 Land north of Sandy Lane, Henfield, West
Sussex, BN5 9UN**

Designated Heritage Assets

Paragraph 42

[The site] contributes to the significance of the Conservation Area by maintaining an appreciation of the historic connections with the countryside and a historic worked landscape.

The proposal, through its urbanising effect, would harm this significance through a reduction in the legibility and understanding of Henfield and Nep Town as historic rural settlements. It would dilute the appreciation of the transition between the historic hamlet of Nep Town and the adjacent countryside

Paragraph 43

Old Mill House is the nearest listed building to the appeal site and is orientated towards it. The site contributes to the understanding and appreciation of the significance of this listed building as a once rural and more isolated vernacular dwelling at the edge of the historic settlement.

[T]he proposal would introduce new built form and associated residential use within part of the setting of the listed building thereby harmfully diminishing the significance of this listed building

Paragraph 44

Like Old Mill House, the appeal site contributes to the understanding and appreciation of the significance of Wisteria Cottage as part of a small group of vernacular dwellings at the edge of a historic settlement with rural origins. It is located further away from the site than Old Mill House and has less of an open view to and from the site. However, the urbanising effect of the proposal upon the setting of Wisteria Cottage would still result in less than substantial harm to its significance.

Paragraph 45

Rosemount Cottage has yet greater physical separation, yet its setting still benefits albeit to a more limited degree from the openness and rural character of the appeal site.

Character and Appearance

Paragraph 48

Although it is located adjacent to residential properties, the site itself has rural qualities that make a strong contribution to the setting of Henfield.

Paragraph 50

Horsham District Landscape Character Assessment (2014) informed the development of the HDPF. For the area in which the site is located it notes that despite some thick hedgerows and copses development would potentially be very visually prominent due to the escarpment and ridgeline along the settlement edge. It also states that the land is important to the visual setting of Henfield

Paragraph 51

The openness of the site and the views to the South Downs and wider countryside contribute positively both to the setting of the settlement of Henfield and to the historic connection of Nep Town with the countryside.

Paragraph 52

Although, houses positioned further down the slope of the site are unlikely to be prominent in views from Mill End and Nep Town, the positioning of houses towards the eastern end of the site (for example plots 1, 2, 3, 35, 36 and 37 of the indicative layout) would be likely to negatively impinge upon views towards the South Downs. Despite the landscaped and open areas indicated, I am not aware of any possible layout for 42 dwellings that would preserve the existing countryside qualities of the site and its relationship with the adjoining countryside.

Paragraph 53

The proposed development would amount to an encroachment into the countryside that would, as outlined above, cause significant harm to the rural setting of Henfield and would sever the historic connection of Nep Town with the countryside

Paragraph 54

Given the considerable number of residential dwellings that enjoy views of the site, the harm to the rural character and qualities of the site would be appreciable from these nearby properties. This weighs against the development in addition to the harm experienced from public viewpoints

Paragraph 57

The visual and landscape character impacts would be limited in their extent, being confined to the immediate area. However, that is not to say that the impacts would not be significant considering the particular historic connection with Nep Town, the setting of this part of Henfield and the proximity of public rights of way to the site. The proposed landscaping would provide additional visual screening of the site from adjacent public rights of way. However, the urbanising effect of the proposals would still be apparent for users of the footpaths.

Paragraph 58

In this case the harm to landscape character and visual harm would be of particular significance.

Paragraph 59

The proposed development would result in net moderate long-term adverse landscape and visual effects that would be significantly detrimental to the character and appearance of the area. It would also not provide appropriate protection of the intrinsic beauty and character of the countryside

Paragraph 72

There would be net moderate harm to the character and appearance of the area as set out above. Despite the new planting, the biodiversity benefits of the scheme would be likely to be modest given the urbanisation of the existing open space.

Taking all these factors into consideration, including the harm to character and appearance, overall environmental matters weigh against the proposal.

Paragraph 75

I must give considerable importance and weight to the desirability of preserving the setting of any listed building.

Paragraph 77

Permission should be refused and the proposal would not represent sustainable development.