

## Representation

1. **Strategic Policy HA17 – Steyning, 256 properties, Glebe Farm**
2. **Legally compliant – YES ; complies with the duty to cooperate – NO**
3. **Reasons for non-compliance and why Policy HA17 is not sound and fails to comply with the duty to co-operate:**

The plan in its entirety reads as a set of very worthy objectives and policies, but without offering any practical measures or funding pledges to support these objectives and to help Parish Councils to provide the infrastructure and facilities to support the population increase related to the proposed developments.

1. We do not agree that this plan is sound and will highlight our reasons with respect to policy HA 17. There is no justification given for the large numbers of new properties included on the Glebe Farm site as Horsham has already exceeded its allocation. We have considered development on this site against the criteria outlined in this local plan and highlight a number of inconsistencies. Fundamentally the local plan lacks an understanding of the connectivity from Steyning, the minimal public transport services currently available and the natural movement south to Shoreham, Worthing and Brighton rather than north to Horsham. Steyning has a limited range of local services that are already overstretched and a large development on the other side of the bypass, potentially increasing the towns population by 20%, without public transport and pedestrian access to those limited facilities, illustrates why including the Glebe farm development in the Horsham local plan appears to us illogical.
2. Specifically, looking at POLICY HA17, the plan contradicts legal requirements to prioritise re-using Brown Field sites for development – embodied in Objective 8 (Policy HA17 proposes a Green Field development) and further outlined in 4.35 where it seeks to prioritise ‘infilling re-development’ in scale with a village’s/town’s scale and character; and in Chapter 9.29 to reduce the impact of development on the rural landscape. The development of 265 houses on Green Field land away from the

centre of Steyning and separated from the town by the A283 therefore contradicts the declared strategies of the Local Plan.

3. Maintaining and growing sustainable communities – economically, socially and environmentally - is a clear objective of this Plan and to be applauded. Together with a strong ‘sense of place’, sustainability is itemised in Objective 1. Steyning falls in the category of a ‘market town’ and, as such, described in 4.35, Strategic Policy 2 – Development Hierarchy as having ‘a moderate range of services, strong community networks’ whilst Steyning has a strong community net work it has only a limited range of services, but then as offering ‘good local employment opportunities and reasonable rail and bus services’ both of which are not the case. There is a very limited range of professional opportunities within the town (with no current prospect of this changing) and public transport offers no rail link and an infrequent bus service. (There is only one bus a day to Worthing, the nearest main town to Steyning.) This means that the residents of the proposed Glebe Farm development are more likely to commute by car to larger towns e.g. Brighton or Worthing or to London via Shoreham station. This negates the sustainability of the development economically and socially and further damages the environment through increased vehicular traffic along through the town and along the A283.
4. Objective 1 also prioritises a ‘sense of place’ whereby residents feel part of town life and its community, nurtured through social and employment opportunities. Given the concerns outlined above, and its out-of-town location, Glebe Farm is unlikely to achieve a cohesive bond with the rest of the town.
5. Objective 2 aims to reduce carbon-emissions with the stated requirement that new development minimises carbon emissions and contributes to local and national net zero targets of 2030 and 2050 respectively. Figure 4 (5.1) in the Plan indicates the breakdown of harmful emissions per sector, with transport contributing 34% and Housing 30% respectively. Would HDC insist and enforce

that all new properties would incorporate 'green' energy e.g. heat pumps, to minimise the otherwise inevitable increase in emissions as a result of the development, so contradicting Objective 2. Furthermore, Strategic Policy 6: Climate Change Carbon Reduction, states (section F) that there is a requirement to ensure that developments re-use existing building materials. As the proposed Glebe Farm development consists entirely of new builds, surely it falls short of the Policy 6 requirements. (And the developer will be required to use offset mitigations instead)

Strategic Policy 8: Design and Construction also states that developments are required to incorporate 'green' forms of heating without the need to retrofit carbon-emitting systems at a later date. SPC seeks assurance that the proposed Glebe Farm development would not be approved without demonstrating that the homes would be carbon neutral with the use of heat pumps and solar panels.

6. As highlighted in point 3 above, the lack of employment opportunities in Steyning means that vehicular transport would increase considerably with the Glebe Farm planned development, so further increasing carbon emissions and defeating the aims of Objective 2.
7. Objective 3 states that new development needs to minimise the impact on the countryside and rural landscape and setting of its location and town. The simple fact that the proposed Glebe Farm development uses a Green Field site contradicts this stated aim. Although much of the District is not a designated protected landscape (ref: The Landscape Capacity Assessment, 2020), Strategic Policy 13: The Natural Environment and Landscape Character, states that anything other than small changes that cumulatively impact on landscape, settlement character and the natural environment will be a key consideration. In short, the Glebe Farm development with 265 new builds, cannot be described as a 'small change' and so contravenes Strategic Policy 13. 265 houses would potentially increase population by 20%. It is

clear that this development would result in a significant increase in the overall level of activity in the countryside, and fails to protect, conserve, and enhance the key features and characteristics of the landscape in terms of its ecological qualities, tranquillity, pattern of woodlands, fields, hedgerows, trees, waterbodies etc. and protection of dark skies.

8. Objective 4 also prioritises the enhancement of the environment and ecosystem services, with the aim of delivering biodiversity net gain, nature recovery and green infrastructure networks. As stated in point 7 above, the development of 265 homes at Glebe Farm can only be detrimental to the natural environment, introducing increased vehicle air pollution and further strain on limited water resources. We remain concerned that the nearby Lithium Battery Storage will continue to cause harm to the neighbourhood and the wildlife.

The land at Glebe Farm is also designated Flood level 1/2. Flood Levels currently do not take into account very heavy rainfall, so with rainfall set to increase as a result of Climate Change, building on such land would increase rather than decrease the risk of flooding to the proposed new properties and its surrounding area.

Strategic Policy 10: Flooding, Development states that proposals will only be supported where they follow a sequential approach to flood risk management, so that priority is given to development sites and areas with the lowest risk of flooding, where shown to be safe. The case for the Glebe Farm land is yet to be proven with a definitive flood risk assessment.

9. Objective 5 is wide-ranging in scope, stressing the need for community 'inclusivity' through the provision of necessary infrastructure that prioritises walking, cycling and public transport, so that developments are accessible to community services and open spaces and contribute to healthy lifestyles. The proposed Glebe Farm development fails to meet these aims; it is a mile's walk into the centre of Steyning, via a busy by-pass, and as stated

above is not well supported by public transport. Residents of such a development are therefore more likely to drive to out-town-shopping areas and train stations than walk or cycle into Steyning. How would HDC ensure that this new development will be accompanied by public transport access to Steyning town and its local facilities? Furthermore, it is difficult to justify the inclusion of such a population influx into Steyning as both the local secondary school and medical centre are already at full capacity.

10. Objective 6, with its aim to safeguard and enhance the character and built heritage of the towns/villages within the district is to be applauded and Steyning Parish Council (SPC) supports Strategic Policy 21: Heritage Assets and Managing Change within the Historic Environment and its aim to safeguard and enhance the District's heritage through regular reviews of Conservation Areas, and an annual update of Historic England's Heritage at Risk Register, to ensure these remain up to date and relevant. It is important to note, however, that there is no 'net-gain' from the proposed Glebe Farm development in terms of heritage value to Steyning. In fact, as a new development, it could be viewed as detracting from the historic nature of the town and the wider District area.
11. Objectives 7 and 8 focus on meeting high-quality local employment jobs and creating opportunities for economic growth, with the aim of reducing commuting distances and growing business, to protect and promote the economic viability of the District, including the appropriate re-use of brownfield land. While SPC very much supports the re-use of Brown Field sites for economic and (appropriate) residential development, as previously stated in point 3 above, the scope for such employment is very limited in Steyning. Strategic Policy 29: New Employment, does not include Employment Site Allocations for Steyning. At present the economy relies on service, retail and limited small-scale manufacturing businesses and there are no specific proposals within the Local Plan to suggest that this will change. Some of the new residents of the proposed Glebe Farm

development might commute within the District, but it is more likely that they will commute to Brighton or London, especially as hybrid working has increased since the Covid pandemic.

12. Objective 9 declares the role of Horsham Town as the primary focus for the community and business. However, for Steyning residents this is not the case. Lying at the far South of the District, the public transport links to Horsham are poor – a 90-minute route – and the proposed development at Glebe Farm would only serve to further divert the focus away from Horsham to Brighton/Shoreham.

The Plan recognises Steyning as a secondary hub and as such any new development must not have a detrimental impact on the provision of local needs. Clearly, with the proposed development of 265 properties, it will struggle to do this without a solid financial commitment/funding from the District Council to support improved public transport, facilities, and infrastructure.

13. Objective 10 aims to provide housing developments that respect the scale of existing places and deliver a range of housing sizes and types to meet the needs of young people, families and older people, and provide of a range of affordable housing. This is exactly what SPC would support. However, the proposed Glebe Farm development falls short of this aim in several ways:
  - a) Previous housing targets estimated Steyning's requirement to be 165 new homes and this the number on which its Neighbourhood Plan 2019 was based. Bearing in mind it is a similar size to both nearby Storrington and Henfield whose planned Local Plan developments propose 55 and 125 respectively, 265 new homes at Glebe Farm is disproportionate to the scale of the town.
  - b) Strategic Policy 27: Inclusive Communities, Health and Wellbeing, emphasises the importance of catering for an ageing population which is higher than average across the District – 22.8% aged over 65, expected to rise to 30% by 2040. This means that it important to build smaller

(downsizing) accessible properties within the town, near to facilities, bus routes and medical provision. Glebe Farm is isolated and does not meet this growing need for older people within the town.

- c) Strategic Policy 38: Meeting Local Housing Needs, gives the appropriate strategic mix of home sizes and tenure. As stated in Strategic Policy 39: Affordable Housing, these percentages e.g. 2-bedroom homes - rented affordable housing 30%; affordable home ownership 40%; open market housing 30%, should be treated as a *minimum*. Policy 39 also indicates that as there is a high need for 3 and 4-bedroom rented affordable houses, and at least 45% of Green Field site developments need to meet this tenure type. The proposed Glebe Farm development plans provides no assurance of the above size and tenure mix. This should be made a mandatory requirement of all proposed developments to meet the Local Plan's Statutory requirements.

14. Strategic Policy 9: Water Neutrality states that a water neutrality statement is required to demonstrate how a development proposal meets policy requirements including, as a minimum: a) baseline information relating to existing water use within a development site; b) full calculations relating to expected water use within a proposed development; and c) full details of how any remaining water use will be offset. No such statement is included in the proposed Glebe Farm planning proposal, and so it does not meet the Local Plan's Water Neutrality strategy.

### **Conclusion**

SPC cannot for the reasons given support the HDC Local Plan 2024 – with specific reference to Strategic Policy H17 – for the reasons outlined above. Any future development in Steyning needs to include entry level affordable housing and smaller properties to allow for the elderly to be able to downsize within the community which would in turn free up the larger houses.

SPC would support development of the previously stated housing target for the town of 165 properties, with appropriate use of in-

fill and Brown Field sites (as stated as a priority in the Local Plan). The town already has proposed developments agreed which meet this requirement and the needs of local residents i.e. they are 'affordable' and suitable for an aging population:

- Former Steyning Grammar School site – 30 modest-sized properties for aged 50+
- Shooting field – 14 flats (previously 2 larger residences)
- Elm Grove Lane – 9 modest-sized properties
- Other recent infill development eg two semis in Goring Road
- A review of Steyning's neighbourhood plan would identify other infill sites that would meet the criteria of the local plan more appropriately.

If there is to be any development on Green Field land in the future then this needs to be conditional on the following:

1. Independent scrutiny of offsetting both carbon-emissions, environmental impact and water neutrality.
2. It meets the 45% minimum threshold for affordable rental and house ownership properties.
3. Support for community land trusts or housing associations to protect the status of affordable housing
4. HDC commitment to funding improved public transport, infrastructure and facilities to serve the population growth.
5. The views of SPC are given due weight in the assessment of any Green Field development.