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HDC Strategic Planning
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Review of the Horsham District Planning Framework (HDPF) - Call for Strategic Sites and Newhouse Farm, West Grinstead

Dear

We are responding to the submission of the above site by Thakeham Homes as a strategic site for 3,500 new homes in the new Local Plan. We strongly object to this proposal due to the impact it will have on Cowfold and the surrounding areas.

The village of Cowfold has long-standing issues with pollution and air quality due to the limited East/West Routes South of the M25 and North of the A27. The village routinely suffers with long traffic queues leading up to the village at peak times and a constant flow of traffic throughout the day. The outcome of this being that in October 2011 Cowfold was designated as an Air Quality Management Area under the Environment Act 1995 Part IV Section 83(1).

Historical data shows that over the last eight years traffic flow through Cowfold has increased by almost thirteen percent, with a worrying increase in HGV traffic by almost seventeen percent. The HDC Cowfold Air Quality Action Plan published September 2013 indicates that, based on 2011 data, HDV (Heavy Duty Diesel Vehicles) produce 13.32 times more NOx than Cars and LDV (Light Duty Diesel Vehicles).

Although the recent (2019) data for both Air Quality and Vehicle flow is currently incomplete, using the available data on an annualised basis indicates that traffic volume has again increased, but with a static proportion of HGV traffic compared to 2018 (Fig1 WSCC Highways Data, 2019 extrapolated from available YTD data). Despite the increase in traffic, the data suggests that due to the increase in the use of newer (EURO 6 compliant) vehicles, the pollution levels in Cowfold have actually begun to decrease. This has led to drop in average levels of Nitrogen Dioxide, such that for the first time since records began it appears that Cowfold AQMA may no longer be in breach of the 1995 Environment act (Fig 2 HDC Annual Status Report, 2019 extrapolated from provisional YTD Data).

It should be remembered, however, that the data is incomplete and not yet verified. In addition the Diffusion Tube technology being used to measure the pollution levels is notoriously inaccurate, so much so that Defra recommendations are that an AQMA should not be undeclared until 3 years have passed with average NO₂ levels being at or below 36µg/m³ which allows for a 10% margin of error. This should not detract from the distinct possibility that Cowfold is now at or below the level of breach. While this progress is very welcome, it does make it doubly important that no decisions are made that would bring Cowfold AQMA back above the levels where a further breach could result. Any decision that could be shown to have contributed to an increase in Nitrogen Dioxide levels that

take Cowfold back to levels that breach the Environment Act, 1995, could place those responsible for that decision in a position of being directly liable for the breach.

Weald Cross Development

The proposed development at Buck Barn consists of 3,500 new dwellings. This could lead to a potential 7,000 additional vehicles in the area. Due to the lack of alternative transport infrastructure (Limited bus services, no train services, no viable cycle route, and no viable footpaths) it has to be considered that a majority of those vehicles will be driven each day. Given that each outward journey will result in a return journey, this could equate to an additional 14,000 journeys a day, many through the village of Cowfold, in addition to the 18,500 vehicles that already pass through the village every day. This is before the additional light goods vehicles that the development will attract, for example the delivery of residents weekly shopping, are taken into consideration. Given that standing traffic is already a regular occurrence on the approach to and through the village, these additional journeys will only exacerbate the pollution issues, leading to a negative impact on the health and wellbeing of the residents of Cowfold.

The Weald Cross Development also includes provision for an underpass/flyover that would dramatically alter the junction where the A272 and A24 intersect. Firstly it is not entirely accepted that this dramatic alteration is needed. The traffic lights already do a more than acceptable job of controlling the traffic flow through the junction, while at the same time controlling the flow of traffic into Cowfold. If the alterations outlined in the proposal from Thakeham Homes were to be carried out, the flow of traffic along the A272 is likely to increase. This will lead to the traffic being stacked up along the A272 with much longer queues forming at the roundabouts. This stationary and polluting traffic will be queued along the route used by children on their daily walk into school. Not only is this specifically putting the respiratory health of the young children and their parents at much greater risk of long-term harm, but it will of course adversely impact the existing pollution issues from which the village has suffered over decades.

The combination of the two factors above provides a strong argument against the proposed development on grounds of pollution alone, especially when taken in context with the Client Earth action and subsequent High Court Ruling on February 21st 2018 and the commitments made by the then Under-Secretary of State for Environment, Food and Rural Affairs in The House on February 23rd 2018.

In addition to the pollution issues mentioned above, it should also be noted that Cowfold itself is a small village, and that the area around Cowfold is made up of a number of other small villages and settlements, some so small that they are not even classified. The proposal from Thakeham homes is to essentially introduce a brand new 3500 property garden town. This proposal is completely at odds with the size of existing settlements and will bring a large amount of extra pressure to an already overstretched infrastructure.

The facilities in the area (Educational, medical etc.) are at, or will reach, capacity within the next 5 years. It is essential, therefore, that any significant new development includes fully binding conditions that include facilities to meet the increased need.

If the scheme is to be considered it should be with the following conditions being met before it is taken forward for further consideration

1. A full review of the impact that junction alterations will have on the village of Cowfold, and an agreed plan to mitigate the negative effects that the changes in traffic flow will undoubtedly have upon the village.
2. A full review of the impact that the additional traffic brought to the area by the development will have on the village of Cowfold, and an agreed plan to mitigate the negative effects that this additional traffic will undoubtedly have upon the village.

3. A review of the additional infrastructure and services that will be required by the Weald Cross development, and a legally binding guarantee from the developer that the additional infrastructure will be provided as part of the development with no attached caveats.

There is a need for additional housing, however, this should be appropriate and proportional as set out in the HDPF settlement Hierarchy. We encourage all Councillors to think carefully before any decisions are made, to fully consider the impact these decisions will have on the surrounding areas in which these excessively large schemes are being proposed and recognise the implications any decision could have should it result in the breach of existing legislation.

We trust you understand our concerns and why we object to this development so strongly.

Yours sincerely

Steve Reading
Chair
Cowfold Parish Council

Charts Fig.1 & Fig.2 attached

Fig1 WSCC Highways Data, 2019 extrapolated from available YTD data.

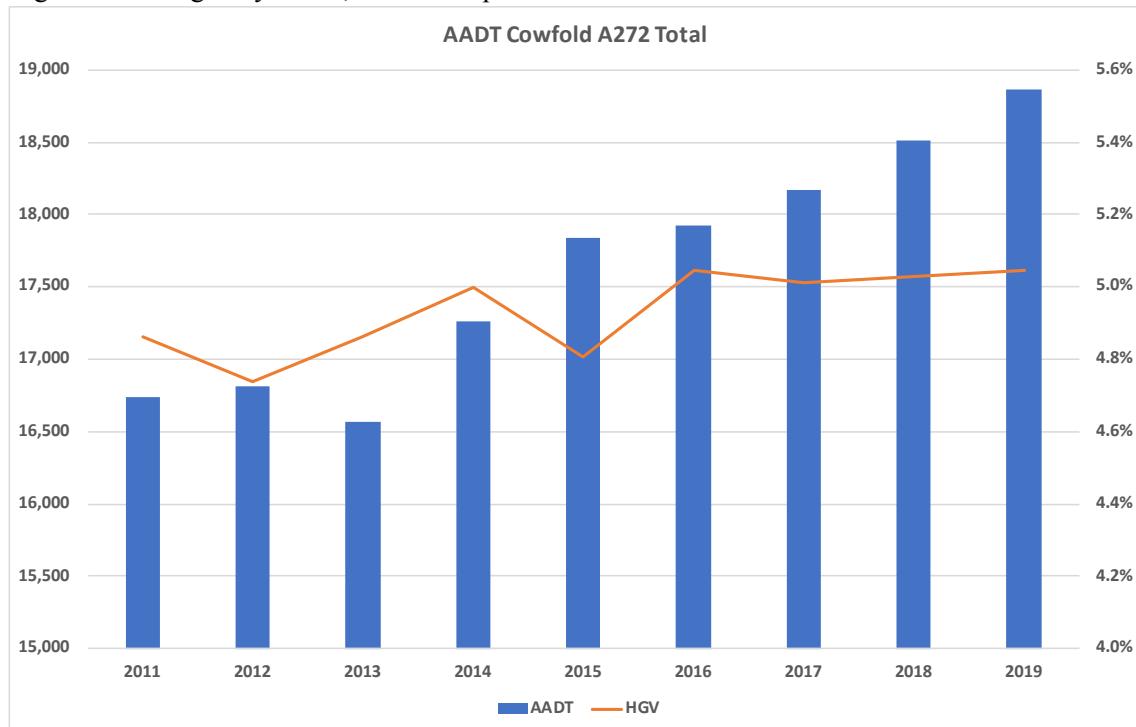
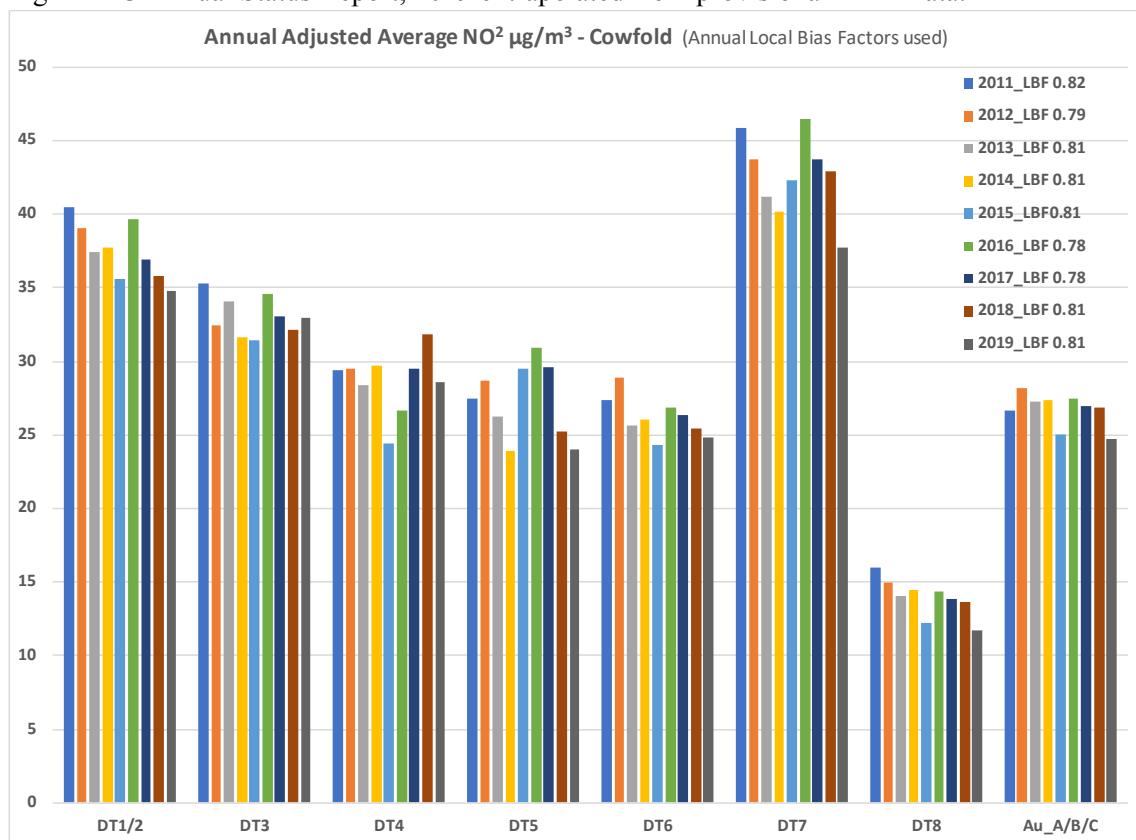


Fig 2 HDC Annual Status Report, 2019 extrapolated from provisional YTD Data.



DT1/2 are co-located at The Street, Cowfold. The average figure is included.

DT3 Opposite Margaret Cottages, Station Rd, Cowfold

DT4 Opposite Trelawny House, Horsham Rd

DT5 Junction of Thornden Rd and Station Rd, Cowfold

DT6 Millers Cottage, Henfield Rd, Cowfold

DT7 3 Huntscroft Cottages, Bolney Rd, Cowfold

DT8 Fairfield Cottages, Cowfold. Set Back from through traffic to provide background data

Au A/B/C Village Hall, Bolney Rd, Cowfold