

The Steyning Society's representations against the inclusion in the South Downs Local Plan ("the Plan") of Land at Horsham Road¹ ("the Site")

- A. The Plan is not sound in respect of the Site because it is not positively prepared, based on proportionate evidence or justified because
1. The Land Availability Assessment ("the LAA") downgrades the sensitivity of the Site's landscape to "medium landscape sensitivity"² from the sensitivity attributed to it in the Authority's land availability assessment in 2016 ("the 2016 Assessment"). The LAA is an important part of the evidence because the LAA describes itself as being "an essential part of the evidence base" for the Plan.
 2. When rejecting the Site as being suitable for development, the 2016 Assessment said that "the whole site ... has High Sensitivity", which it qualified in respect of the south eastern corner by saying that this corner had "slightly less Medium High Sensitivity due to its relationship with the settlement pattern".
 3. The 2016 Assessment attributed High Sensitivity to the Site "due to proximity to public right of way, conservation area, elevated position above settlement and intervisibility with the close scarp slope and the downs". It attributed "slightly less Medium High Sensitivity" to the south eastern corner "due to its relationship with the settlement pattern" but added that "access and proximity to the Conservation Area and historic core of the settlement are significant constraints".
 4. The 2016 Assessment also said that development of the Site would have a "potential adverse impact on heritage assets".
 5. The LAA does not refer to the 2016 Assessment and therefore gives no reason for departing from the 2016 Assessment. It says that the Site was identified by the Wiston Whole Estate Plan but it does not say when it was identified or why the Site owner's plan is relevant to the Site's significance.
 6. The 2016 Assessment is to be preferred to the LAA because it is in line with other assessments of the Site including
 - a. the Site's designation as an area of outstanding natural beauty before it was incorporated into the South Downs National Park (and thereby became entitled to a high level of protection, which is still recognised today under the National Planning Framework).
 - b. the decision³ by Horsham District Council, as the then planning authority, in 2003 to refuse Wiston Estate permission to construct a track on the Site to the backs of some of the houses on Mouse Lane and to allow part of the Site to be used as gardens by these houses, which was upheld on appeal⁴. The inspector said that the track would be "discordant in this farmland setting in open countryside and that, in damaging the rural character and appearance

¹ Site number SDA 77

² Appendix B(iii) at PDF page 91

³ Application ST/24/03 which is available on the Council's planning website

⁴ The decision is available on the same planning website under the same reference

of this landscape bordering Steyning, both this track and the associated traffic would conflict with the aims and appearance of national and local policies to safeguard its *special* quality” (emphasis added). He also said that the change of use “would be harmful to the character and appearance of the land and, as such, inconsistent with the strong policies directed to its conservation”.

- c. the representations⁵ made by The Sussex Downs Conservation Board (a predecessor of the Park Authority) against this planning application. It said that “the extension of the curtilages would have a *significant* impact on the character and appearance of the area” and that the track would have “*significant* landscape implications in terms of a suburbanising influence upon the character and appearance of the area and would be *visually prominent* in views on top of the Downs, to the detriment of the village in the AONB landscape” (emphasis added).
- d. The Steyning Historic Character Assessment Report dated August 2004⁶, which says that this part of Steyning is the only part of the town which has not gained 19th and 20th century suburbs, *that maintaining this rare historic urban/country side interface must be a priority*, and that its greatest vulnerability is to its key characteristic of being on the fringe of medieval and modern town (emphasis added). The reference to vulnerability can only be a reference to vulnerability from development.
- e. Horsham District Council’s Steyning Conservation and Management Plan of 2018 which says that this fringe of Steyning has a “high sensitivity to change associated with development”⁷.
- f. The Site was not included in the original version of the LAA and was only added in December 2025.
- g. The LAA fails to take into account
 - I. Steyning’s importance as a historic market town. This is recognised by the national listing of 111 buildings⁸, many of which are timber-framed buildings, as well as by the designation of the central part of the town as a Conservation Area;
 - II. that the Site’s elevated position makes the Site visible from the centre of the town and from the Downs and that any development there would therefore be particularly conspicuous;
 - III. the relevance of other development in Steyning in meeting the town’s housing needs, including the current development at Glebe

⁵ Also available on the same planning website under the same reference

⁶ https://www.westsussex.gov.uk/media/1747/steyning_eus_report_and_maps.pdf. Commissioned by Horsham District Council. West Sussex County Council and English Heritage

⁷ [Steyning Appraisal and Management Plan.pdf](#) at page 16t

⁸ This includes two at Grade I and seven at Grade II*

Farm which, when completed, will provide 265 new dwellings and the likely development of the old Grammar School Site in Church Street which has recently been sold for development;

- IV. the effect that these other developments and any development of the Site would have on services in Steyning, including medical services, which are already overstretched, schooling at primary and secondary level, water supply and sewage disposal;
- V. the increased pressure that development of the site would put on the Horsham Road. This road is one of the two main access roads to Steyning. It carries particularly heavy traffic in term time around the schools on the opposite side of the road. This part of the road is narrow and not easily widened because it is at a lower level than the Site and the other side of the road, which has been developed for many years. It is prone to extensive flooding in the winter months, which can reduce the usable road from two lanes of traffic to one for extended periods. The road leads to a very sharp bend at the junction with Mouse Lane.
- VI. the safety of pedestrians using the pavement beside the road which is narrow and cannot be widened. Although it is intended to ameliorate this by the provision of a new path, this path would join the Horsham Road at a point where is no pavement on this side of the road and would therefore require traffic controls within approximately twenty yards of the very sharp bend. This must give rise to safety concerns, having regard to poor visibility, the heavy traffic flow at times and the nature of traffic using the road, which includes buses, lorries and container vehicles.
- VII. that Steyning already has adequate community halls, including two halls at the Steyning Centre, the Penfold Church Hall, the Methodist Church Hall and the Athletic Club Hall. It also has a fully equipped leisure centre, a museum and a library. The Plan appears to suggest that the provision of a community building is a relevant consideration because the building is specifically mentioned in paragraph 5.240 at page 288 of the Plan, but the Plan fails to identify the purpose for which this building will be used. Alternative public uses for Brotherhood Hall have been given anxious consideration since the Grammar School stopped using the hall but no sustainable use has yet been identified.
- VIII. that developing the site will inevitably result in demands for further development along this side of the Horsham Road up to the A 283, generating urban sprawl and causing detriment to the National Park.

- B. The Plan is also not sound in respect of the Site because it is not consistent with national policy as expressed in the National Planning Framework applicable to the Site, namely
1. that sustainable development should protect and enhance the natural environment, which is one of the Framework's overarching objectives⁹;
 2. that Planning policies should contribute to and enhance the natural environment by protecting and enhancing valued landscapes¹⁰; and
 3. that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues and that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas¹¹.

For the reasons given above, the proposed development would not comply with any of these requirements. In particular, it would flagrantly disregard the requirement to conserve the landscape and scenic beauty of the Site, instead of giving this consideration the great weight required by the policy. It is therefore contrary to the statutory purpose¹² of national parks which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the national parks and to promote public enjoyment and understanding of their special qualities, and to which the Park authorities must have regard¹³.

- C. The Plan is not legally compliant in respect of the Site on general public law grounds because, for the reasons given above, it fails to take into account relevant and material evidence, including the evidence that the Park's planning authority's earlier assessment that the Site is unsuitable for development, it does not comply with relevant policy in the National Planning Framework or the statutory duties and appears to rely on irrelevant considerations such as the provision of a community hall and the Site owner's assessment that the Site has a potential for housing.
- D. For these reasons, no modification would make the Plan sound or legally compliant in respect of the Site - apart from reinstating the 2016 Assessment that the Site is unsuitable for development.
- E. The Inspector is invited to visit the Site to form his or her own view about the Site's significance and the challenges posed by its access to the Horsham Road.

The Steyning Society
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⁹ Paragraph 8c

¹⁰ Paragraph 187

¹¹ Paragraph 189

¹² Environment Act 1995, Section 62

¹³ Ibid