

Roger Potter  
Bramber Parish Council  
Meadow Edge  
The Street  
Bramber  
Steyning  
BN44 3WE

Our ref: BNP Reg. 14

Your ref:

Date: 1 November 2019

By email

Dear Roger Potter

**Re: HDC Representation to Bramber Neighbourhood Plan (Regulation 14)**

Thank you for the opportunity to make comments on the Pre-Submission Draft Bramber Neighbourhood Plan. The following are officer's comments:

Horsham District Council is supportive of the parish's work to develop their Neighbourhood Development Plan. It is acknowledged the Parish Council have undertaken a significant amount of work to reach this particular point and should be commended for all their effects.

The following are general comments to the Pre-Submission Draft Bramber Neighbourhood Plan:

1. Bramber and Upper Beeding is identified as a Larger Village in the settlement hierarchy as set out in Policy 3 of the adopted Horsham District Planning Framework (HDPF). There is an expectation that emerging neighbourhood plans are required to accommodate its fair proportion of the minimum 1,500 dwellings to be delivered from Neighbourhood Plans across Horsham in accordance with Policy 15 (4).
2. The emerging plan has made its best endeavors to meet the Housing requirement by objectively assessing sites put forward in its call for sites and HDC acknowledges that the conclusions made in Appendix A Site Assessments that Site 1 is unsuitable for development. I attach independent landscape and heritage assessment of Site 1 (please refer to Appendix A & B) and given without prejudice. Site 2 falls under the jurisdiction of the South Downs National Park Authority. HDC acknowledges that the emerging plan will not be allocating land for development in the current plan. A review of the Neighbourhood Plan will begin once the Inspector's report on the HDC Local Plan Review is published (expected 2021).
3. The Pre-Submission Draft Bramber Neighbourhood Plan has undergone an informal 'healthcheck' with HDC officers, with the expectation amendments will be implemented to ensure general conformity with planning legislation. This will bring reassurance that the plan has been positively prepared, and every endeavor has been made to ensure the plan is in general conformity with national planning policy which as you are aware is one of the key Basic Conditions by which the Neighbourhood Plan will be assessed

against. I attach a copy of the healthcheck for reference.

4. The emerging Bramber Neighbourhood Plan proposes Clays Field as a Local Green Spaces (LGS) the village of Bramber. Horsham District Council supports the principle of Local Green Space designations. However, it is acknowledged that a strict criterion must be satisfied before formal designation and there is the potential that the proposal put forward by the local community will not meet the requirements stipulated by Paragraph 100 of the National Planning Policy Framework. For information, we have provided this advice to the community, and have also explained that an examiner of the plan will also consider the site to ensure the LGS proposal meets the requirements set out by national planning policy and may ultimately recommend alterations or deletion of the site to ensure the plan meets the basic conditions.
  
5. It is the consideration of Horsham District Council that the Steering group have fully engaged with the relevant stakeholders to produce a neighbourhood plan supported by a robust evidence base. It is also the consideration of Horsham District Council that the plan meets the Basic Conditions and will contribute positively towards sustainable development and the improving the quality of the environment.

If you have any further questions regarding this representation, please do not hesitate to contact me.

Yours sincerely,



**Gavin Curwen**  
**Neighbourhood Planning Officer**

Cc: Carol Stephenson - Bramber Parish Clerk

## Appendix A

### Landscape Assessment: Clays Field, South of Castle Lane, Bramber

**The site owner wishes to put forward the Clays Field site for allocation in the Bramber Neighbourhood Plan. It is considered that the site could provide some new housing along with a large area of public amenity green space.**

Site Visit – A site visit was carried out on 10/06/2019 and included views from the footpaths along the South Downs.

#### Site Description and Appraisal:

The Site is located within the Parish of Bramber, but adjacent to the south eastern boundary of Steyning and west of the A283.

The South Downs National Park boundary sits in close proximity circa 200m away to the south. Bramber Castle ruins, grade I listed, sit to the east also c. 200m and grade II listed Burletts at 150m approximately to the south east.

The site is irregular in shape and predominantly rural in character although existing houses on Goring Road are visible along the site's western boundary and are partially seen through the vegetated boundary and trees along the northern boundary. Castle Lane forms part of this northern boundary and is a narrow rural lane.

The site comprises of a field parcel in agricultural use bounded by mature treed hedgerows/shaws to the east and south western boundaries, and some scattered trees within. The northern and south eastern boundaries are also lined with trees and hedgerows but not as wide, and kept at a lower level, allowing interrupted views towards the site from Castle Lane and glimpses through to the South Downs escarpment. The western boundary abuts the rear gardens of properties on Goring Road and comprises a mix of well-kept hedgerows, close board fence, post and rail fence, some trees and other ornamental planting.

The well treed southern part of the site's boundary that abuts Clays Hill, makes a valuable contribution to the approach, Parkland feel and landscape setting of the village of Steyning. This would however be retained as such as the southern side of the site is proposed as open green space.

A public footpath (prow 2728) runs through the site closer to the south western part allowing full open views of the site. It is accessed from Goring Road through an alleyway between properties no. 49 and 51, following across the field to meet the western corner of the site's southern boundary adjacent to Clays Hill. In addition, the landowner currently allows access to the whole of the site and there are few different made paths locals use for dog walking, jogging, etc. A pedestrian gate is also located from Castle Lane allowing access from the site's northern boundary or as a short cut from the western side of Steyning to the east over the bypass and towards Bramber Castle.

Views towards the South Downs NP are available mostly within the northern part of the site. The field is well

used and a valued asset by the locals.

Visually the site is well contained from close and medium distance views from the east and south due to the mature vegetation. From the west and north however, there are glimpsed views over or through the existing hedgerows and through the gaps between properties on Goring Road.

From the wider landscape, the northern and central parts of the site is openly visible from the elevated South Downs Way path (provision 3183) within the National Park. From here the appreciation of the site is one of its landscape setting role but also the SDNP's setting due to the landform and sitting of properties off Clays Hill and Maudlyn Close in the lower part of the footslope.

The topography is undulating and the site gently slopes from north to south. A lake sits in the centre of the site towards the eastern boundary and seems to connect to a drain that runs along the A283 to the east and Clay Hills to the south which might still form part of the wider water network system connecting to the River Adur.

Notwithstanding the mature landscape buffers to the east and south, some noise intrusion is noticeable within the site as result of the traffic on the A283.

#### Background History:

Planning permission refused for change of use of land from agricultural use to equestrian use. The application sought permission for the keeping of horses, and for the erection of a stable block with associated hardstanding, fencing and vehicular access.

#### Landscape Character Guidance:

At District level, the site falls at the edge of the O4 Lower Adur Valley Area of the **Horsham District Landscape Character Assessment**.

Key characteristics of the area are:

- *Broad open, flat bottomed valley.*
- *Gently sloping lower valleysides, steeper upper valleysides. Open character with few hedgerows/hedgerow trees.*
- *Large scale field patterns with arable farmland dominant. Some floodmeadows remaining on the valleyfloor.*
- *Visual intrusion from quarry, cement works, pylons and the A283.*
- *Important cross valley views from higher slopes.*
- *Sparse historic settlement pattern. Distinctive local flint vernacular with brick detailing in Botolphs.*

The overall character of the area is described as follows:

*The area comprises a large open chalk valley, with a broad, flat floodplain. There are few trees and hedgerows except on some lower valleysides. Chalk valleysides are smoothly rounded with sweeping contours and are dominated by arable farmland, with some fragmented areas of chalk grassland. The floodplain includes both*

*drained arable farmland and flood meadows. Traditional farms and rows of cottages are concentrated on lower valleysides. Intrusive elements, including the former Cement Works site and A283, have a significant impact on the east side of the valley.*

Key issues are *Loss of floodmeadows and other wetland features to intensive arable agriculture and Visual intrusion of road traffic in undeveloped floodplain landscape.*

Overall landscape condition *is declining due to intensive arable agriculture, and major road intrusion in the valley.*

Overall sensitivity to change is high, due to the visibility of the floodplain/valleysides and some intrinsic landscape qualities. Key sensitivities are:

- Any built development that would alter undeveloped character of most of the area.
- Agricultural change resulting in the loss of remaining wetland landscape features.

Planning and Land Management Guidelines include:

- *Conserve the open character of the floodplain.*
- *Ensure any small scale development on valleysides respects historic settlement pattern, form and building materials.*
- *Maintain cross valley views.*
- *Conserve and manage watermeadows.*
- *Conserve small pastures.*
- *Conserve and manage drainage ditches to maximise floristic diversity.*
- *Encourage the reversion of valleyfloor arable land to pasture.*
- *Encourage the reversion of valleyside from arable to chalk grassland.*
- *Encourage small scale tree planting at the foot of combes and around settlements and farms where appropriate.*
- *Encourage the planting of native alder and willow riverside trees where appropriate.*
- *Incorporate the embankments of the A283 by scrub and woodland planting.*

The Horsham District Landscape Character Assessment on section 5 assesses the District key **settlements character and guidelines**. The site falls within and forms part of the landscape setting area 2 for Steyning, refer to page 175 of the document. The area is described as:

- gently undulating landform,
- large green space adjacent to Clay Hill links countryside to the town and provides a wider setting for Bramber Castle
- parkland character with avenue trees along Clay Hill

With regards the sensitivity of the landscape setting areas to development or change the study concludes that the area is considered to have many intrinsic landscape qualities, to make a very important contribution to distinctive settlement setting, to be of moderate visual prominence, low intervisibility, (although there are view to and from the Downs), and of high sensitivity.

Planning and Landscape enhancement guidelines include:

- Conserve and enhance distinctive character of the historic core
- Conserve and enhance informal green spaces linking the town to the countryside
- Conserve well treed character of the early 20th Century residential areas

The site is also assessed on the **Horsham Landscape Capacity Study** under Local Landscape Character Area 66: Bramber Castle and Clays Hill. Landscape Character Sensitivity is described as:

- The topography of this area is mostly gently undulating, but with the prominent mound of Bramber Castle to the east.
- It is primarily formed of a large green space adjacent to Clay's Hill which links the wider countryside to Steyning, and provides a wider landscape setting to Bramber Castle
- There is a parkland character along Clay's Hill
- There is a soft well treed settlement edge
- Overall, the landscape in good condition

Key landscape features and qualities of this area are highly sensitive to development

#### Visual Sensitivity

Whilst there is some enclosure from tree belts, the landscape is relatively visible from the surrounding roads and housing areas, and would have moderate sensitivity to housing development. Employment development would be more visually intrusive due to its greater scale and height.

#### Landscape Value

- There is a high level of historic interest - Bramber Castle
- Important to the setting of Steyning and Bramber
- Adjacent to the South Downs National Park
- Low tranquillity due to the A283 and Clay's Hill roads
- The park and Castle currently provide an important amenity area for residents and tourists visiting the castle.

#### Landscape Capacity

The area has a strong distinctive character and is of overall moderate visibility. The area has no landscape capacity for large scale development which would be likely to result in unacceptable adverse impacts on character and setting of Steyning and Bramber.

LLCA 66 covers a wider study area within the south eastern surrounding fields of Steyning and concludes has having No/Low capacity for medium scale housing development due to the high sensitivity of the area and moderate-high landscape value.

**Recommendation:**

Based on the appraisal and landscape assessment studies above, it is considered that the site has no landscape capacity for development.

The undeveloped nature of the site is considered to form part of the appreciation of the village landscape setting as well as the wider Bramber Castle landscape setting.

This field, together with Bramber Castle (Grade I listed) and large grounds of properties along Clays Hill - Darryname, Burletts (Grade II listed) and Greenleaves,- also from part of the setting of the South Downs National Park, Bramber and are the remains of the historic fabric present on Old maps as far back as c.1875.

The site, is an important field described within the Horsham District Landscape Character Assessment on section 5, Settlement Character and Guidelines as '*large green space adjacent to Clay Hill links countryside to the town and provides a wider setting for Bramber Castle*'. This in addition to the distinctive character and recreational value, intervisibility and beautiful views towards the Downs, gives the site a high landscape value notwithstanding it not being subject to a landscape designation and considered as 'ordinary landscape' in planning terms and NPPF context.

Vehicular access to the site would be made through Castle Lane, a narrow and rural character lane which once linked the Castle to the heart of Steyning. As discussed within the site promotion proposals, the lane would need to be widened for footpath inclusion and as result its character lost to allow for highways requirements. This urbanising negative effect would be further exacerbated by the presence of built form in contrast with the existing open field.

As described above and shown on photos below, the northern parts of the site, where the development would be located, would be in full view from the elevated footpaths within the NP and would close the gap between SDNP and Steyning, bringing the urban form further into the countryside, causing harm to the setting of the National Park and resulting in the perception of coalescence between Bramber and Steyning.

For these reasons, it is considered that an allocation would result in harm to the landscape character and visual amenity of the area including views from the South Downs NP. It would also result in harm to the landscape setting of Steyning, Bramber Castle and National Park as well as resulting in coalescence between Steyning and Bramber when appreciated from the elevated path on the SDNP.

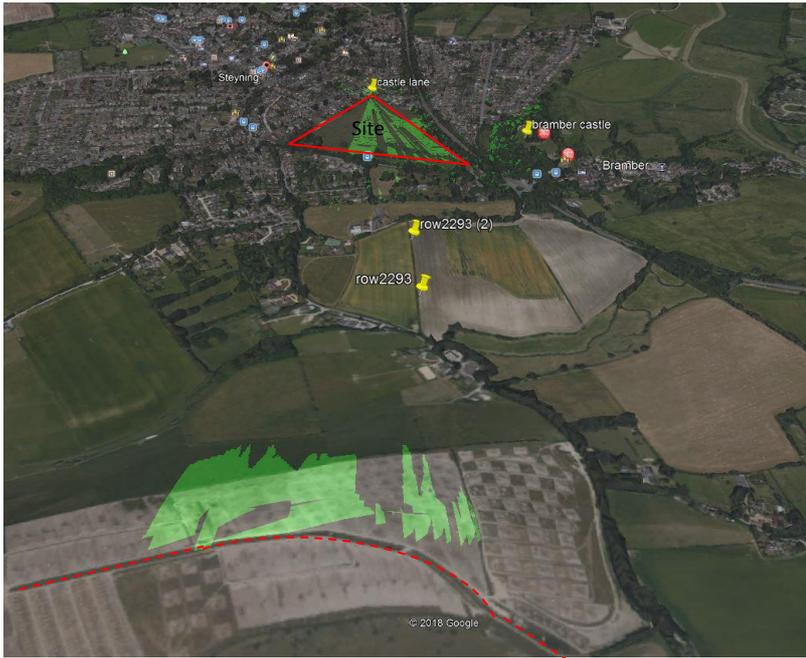
Ines Watson CMLI  
Senior Landscape Architect



*1. View from the SDNP towards the site shown in red*



*2. View towards the site shown in red from the SDNP*



Photos taken from the Sussex Downs Row3183. Google viewed



3. Panoramic view from the SDNP



4. Castle Lane approach to the site

## Appendix B

### Heritage Comments: Clays Field, South of Castle Lane, Bramber

Sent July 2019

Dear Norman,

In terms of the impact of any future development on the site within the setting of Bramber Castle, a scheduled ancient monument and grade I listed building, it is important to understand the significance of this piece of undeveloped land within the context of Steyning and Bramber.

Steyning is a pre-conquest settlement and was the main town in this part of Sussex in the early eleventh century. Bramber was created by William de Braose immediately after the conquest in direct competition for revenue with Steyning. The history of the two settlements is one of separation and distinctiveness. This has been eroded over time by the suburban expansion of Steyning to the east of the old railway line, now the A283, and south of King's Barn Lane. This suburban expansion extends to the base of the natural outcrop on which Bramber Castle sits on its north west side. Clays Field is the only remaining open space directly between Steyning and Bramber. Clays Field is recorded as a post medieval designed landscape. It is thought to contain a buried Late Bronze Age occupation layer following the discovery of a hoard when the artificial lake was created in the southeastern end in 1981. But no medieval finds of any significance have been made. It has no recorded link with the castle in functional terms although it is thought that this part of Steyning as far as the junction with High Street and Church Street was claimed by de Braose in the late eleventh century. Despite this lack of functional link, Clays Field is significant in maintaining an appreciation of a physical and experiential distinction between the two settlements. Due to the historic relationship between the two settlements maintaining this distinction is essential to maintaining the special interest of Bramber Castle.

Although there is extremely limited intervisibility between the castle structure and Clays Field due to the thick bands of trees on the west side of the castle mound and around the castle motte, the castle is experienced in its setting which includes Clays Field. Despite the suburban development either side of Castle Lane to the east of the A283 and to the north of Castle Lane to the west of the bypass, it is still possible to understand and appreciate a distinction between the two settlements. When travelling east along Castle Lane the castle mound comes into view as one approaches the boundary line between the houses on Goring Road and Clays Field. The mound rises from the Lower Chalk formation and is a distinctive feature in the landscape. The open foreground of Clays Field is important in reinforcing the perception of strength and impressiveness of the castle in the landscape. If the north part of Clays Field is developed this will restrict views of the castle mound and dilute a perception of the significance of the castle in this location; to intimidate the historic occupants of Steyning, particularly the Canons. I am satisfied developing this part of Clays Field will lead to harm to the special interest of the castle in its setting.

Regards,

Seán Rix  
Senior Conservation Officer