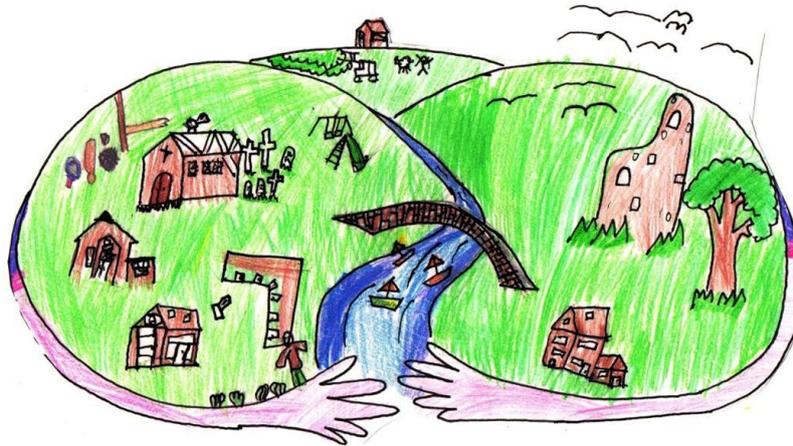


Upper Beeding Parish Council



Neighbourhood Plan

Statement by Upper Beeding Parish Council in response to the initial comments of the Independent Examiner.

10th September 2019

Policy 2

I understand the role and purpose of the policy. However, the final paragraph reads more as supporting text rather than policy. I am minded to recommend that it becomes supporting text. Does the Parish Council have any comments on this proposition?

The purpose of this paragraph is to give assurances that detailed proposals are not yet agreed and the allocation numbers to each of the sites proposed could be subject to change. Upper Beeding Parish Council (UBPC) feel this is particularly important considering the nature of the Pound Lane sites. UBPC are aware that the number of dwellings on each site are subject to a variety of requirements and wanted to reassure residents that development would be site specific taking into account all the environmental considerations particularly concerning the Pound Lane sites.

That said, should the inspector consider this clarification is greater achieved by making the statement supporting text, the Parish Council would support this amendment.

Does the Parish Council have any comments on the representation made by Highways England on the potential impact of the levels of development included in the Plan on the operation of the strategic highway network?

UBPC do not agree with the assertions made by Highways England in their representation. It is the understanding of the Parish Council, Highways England has misinterpreted the AECOM Housing Needs Assessment (2017). The AECOM HNA methodology is advocated by Locality, the government body to support neighbourhood planning and has been employed to identify a housing requirement figure which is both robust and in line with best practice (PPG: Paragraph: 105 Reference ID: 41-105-20190509). The housing requirement put forward by the AECOM HNA is a 'naked' figure and does not consider local circumstances, constraints nor the availability of development opportunities. It is noted the representation states 213 dwellings is being proposed but this incorrect as the UBNP is only proposing 109 dwellings across a number of sites up to 2031 in the emerging plan.

The HDPF is supported by a comprehensive evidence base including a robust transport assessment of the impact of strategic development on the transport network. The [Horsham Transport Study](#) (April 2014), supports HDPF growth up to 2031. It follows the growth proposed in the emerging Upper Beeding Neighbourhood Plan is within the tolerances (i.e. within the 1,500 dwellings to come from neighbourhood planning) as stipulated in the HDC Transport Study.

The district council is undertaking the process of reviewing its Local Plan and will include an assessment of future growth scenarios as stipulated from the Standard Methodology. This work has only started in earnest and should not be confused with the evidence base to support the adopted HDPF which has been robustly tested at Examination. Finally, as neighbourhood planners who freely volunteer their time accordingly on behalf of the community, it is not considered appropriate for this neighbourhood plan or any other to undertake a district wide assessment of the cumulative impact of traffic derived from development and it should be regarded as an ongoing strategic concern for HDC. The Upper

Beeding Neighbourhood Plan has been planned positively and contributes to sustainable development and is supported by evidence considered to be sufficient and proportionate and follows guidance outlined in the PPG (Paragraph: 072 Reference ID: 41-072-20190509).

Paragraph 6.6 of the Plan comments about the AECOM study and its assertion that 213 dwellings are required in the Plan period. The schedule of documents on the HDC website includes the AECOM study. Its paragraph 20 comments that the need is for 189 dwellings. Please can the Parish Council advise on this difference

For clarification the Parish can confirm the 213 dwellings is required over the plan period and is the definitive Housing Requirement Number as advocated by [AECOM Housing Needs Assessment](#). Notwithstanding, the figure of 213 or 189, UBPC can confirm that the proposed allocation of 109 houses in the neighbourhood plan has been carefully considered. Best endeavours have been made to accommodate as much as the housing requirement as possible taking into account local circumstances concerning flood risk, landscape, local amenity, character, design and infrastructure and local resident's preference for sympathetic development proposals for the village.

The proposed allocation of 109 dwellings is supported by robust evidence such as the site assessment work which underpins the plan and are there limited opportunities for growth within and abutting the settlement edge. UBPC consider this number to be deliverable and demonstrates positive planning making efficient and best of use of land.

Policy 3

I have read the various representations. Can the Parish Council advise on the current position with regard to liaison and joint working between the various landowners and potential developers?

UBPC are aware that a new agent has been appointed represent one of the landowners at 'Land East of Pound Lane' and has been in correspondence with the developer, Reside Homes. It is anticipated that the three landowners will work together to produce a comprehensive development. It remains the view of UBPC that the three sites will provide a better solution if they work together and deliver a comprehensive proposal.

Rydon Homes, the previous developer behind all three sites have only recently withdrawn their interest/control fully, hence there are no detailed proposals yet. It is anticipated that Reside Homes will contact the other landowners to move forward collaboratively.

Is the site capable of early delivery within the Plan period?

UBPC consider that the site is capable of early delivery within the Plan period (within the 1st five years) subject to the usual planning requirements. The lead landowner/developer Reside Homes is a local developer based in Surrey with a strong reputation for delivery.

In criterion 7 how would a judgement be made about the need or otherwise for a secondary access? Similarly, how would a judgement be made about the extent to which any secondary access would not prejudice the comprehensive development of the site?

Any discussion regarding the need for a secondary access would be made in consultation with WSCC Highways, the County Planner and SDNP to insure the best solution for the development and neighbouring residents. UBPC are mindful that there are a number of factors and considerations including pedestrian/ footpath access, impact on a listed building, the suitability of the Lane and surrounding roads including the junction at Manor Road and Henfield Road, conservation and historical issues, suitability for all users and it must not be detrimental to current users and residents. It is expected those issues will be dealt with through the development management process.

The policy and the text (paragraph 7.24) comment about supporting a comprehensive development of the site. Would it follow that the policy would not support the separate development of the component parts of the site?

UBPC support the comprehensive development of all three sites. As shown in 7.28 both SDNP and WSCC both support cumulative development with particular regard to a landscape led, comprehensive design approach that will be considerate of the area as a whole. UBPC consider that a 'piece meal' approach could have a detrimental effect on the wider locality and in particular on the setting of the national park. A comprehensive landscape led masterplan is considered to be appropriate framework to deliver a sympathetic development which the community would be supportive of. Problems could also occur should one of the sites withdraw resulting in a 'gap' between the BUAB and any potential development.

Could the component parts of the site be developed separately within the context of an agreed/approved landscape-led masterplan?

UBPC have concerns that a 'piece meal' approach would be difficult to deliver with potentially differing priorities and objectives of each of the site owners. Should one of the site owners defer or withdraw the whole area design could be compromised. UBPC believe each of the three landowners need each other to make the best and most efficient use of the site and produce a comprehensive and sympathetic development which will enhance the area and met the objectives of the Plan. The first position of the Parish Council is to have a comprehensive proposal. Nevertheless, in the absence of a collaboration/equalisation agreement between the landowners, the parish council would consider a phased development within the context of a comprehensive landscape-led masterplan.

Paragraph 7.23 comments about the potential capacities of the three component parts of the proposed site. How has an indicative figure of 70 dwellings been reached as included in the policy itself?

Upon careful consideration the figure of 70 dwellings has been derived from the gross developable area to exclude areas located within flood risk zone 2 and 3. It is anticipated this area would be given over to mitigation through Sustainable Drainage measures with an opportunity for the creation of public open space with the added benefit of delivering a net

increase in bio-diversity gain. Regarding density a simple calculation of applying 30 dwellings per hectare was applied on the net developable area outside flood risk areas which arrived at approximately 70 dwellings for the scheme. UBPC believe this to be a realistic number for this site considering the conditions and constraints attached to the site while making best and most efficient use of land.

In addition, during both the regulation 14 and 16 consultations, residents expressed the desire for smaller design led developments rather than large inappropriate extensions and this density goes some way to addressing these issues as well as insuring a landscape lead design that considers the context, environment and impact on the wider landscape. Previous applications (withdrawn) on Land East of Pound Lane significantly exceed 70 dwellings and considered to be inappropriate and entirely out of character with the village.

Policy 5

I acknowledge the current occupation of the site. However, is criterion 3 necessary? Presumably the current owners will take a business judgement about relocation.

Informally the site owners have informed the steering group the site is available for development. The Horsham development Planning Framework (HDPF), Policy 9 and Policy 10 is looks to retain countryside employment. Horsham District is a rural authority and the rural economy is pivotal to the economic health of the district. Loss of rural employment sites should be resisted unless it can be demonstrated the current use is not viable and support by a robust market strategy over an agreed timescales' UBPC considered it important to re-enforce these policies by making reference to the condition in Policy 5 and contributes to sustainable development by providing employment opportunities for residents minimising the need to travel significant distances for work. Nevertheless, the parish council would like to see redevelopment of this site for an appropriate use which is sited in a primarily residential area.

Does the policy anticipate the maintenance of the existing open, green street frontage?

UBPC acknowledge there is no specific reference to maintaining the existing green frontage as it was believed this would be considered at planning application stage, however the broad requirements in Policy 5: criterion 5 and criterion 6 which refer to landscaping and amenity would ensure a suitable frontage is considered.

Policy 7

Does the policy anticipate that any new development will be served through the existing principal access into the wider nursing home site?

UBPC anticipate that any new development would be served through the existing principal access. However, it does not consider this to be a rigid criterion and would prefer this to be left open for any developer to consider all the options and put together the best proposition for consideration at the planning application stage. Access would then be considered and managed through the planning process.

Is criterion 4 necessary? Might some existing car parking spaces need to be lost/redeveloped to incorporate the new development and its own car parking requirements?

UBPC considers it important that the WSCC parking calculator is met and dealt with at the development management process, hence the inclusion.

Policy 9

The first part of the policy is well-developed. However, should the second part be a community aspiration?

UBPC have considered your comment and agree that a second section for community aspirations would make the policy more comprehensive.

Policy 11

The Local Green Spaces Report is an excellent piece of work. However, the policy itself goes beyond the matter-of-fact approach in the NPPF. Are the three identified 'very special circumstances' at the end of the policy necessary?

Having considered your comments, UBPC are happy to remove the three points identified as unnecessary.

Representations

Does the Parish Council wish to comment on any of the representations made to the Plan in general?

UBPC are aware that every effort has been made to engage with residents throughout the whole process going above and beyond the statutory requirements. The most recent public engagement was a series of open sessions presenting the plan following regulation 14 and prior to regulation 16. A flyer was delivered to every household in the Parish advertising this (attached page 8) and members of the team were on hand for discussion and clarification.

The team is made up of a mixture of Parish Councillors and residents, all members of the team are engaging and were available at numerous events during the process (including annual parish meetings, school fayres, fundraising events etc). The Chairman wrote regular articles for the village newsletter, updated Facebook, parish noticeboards and the website and gave regular updates at parish council meetings.

All statutory consultations have taken place and every representation and comment has been considered in putting the plan together and the process has remained positive and transparent throughout.

The consultation document gives further details of all the public engagement that has taken place and UBPC are impressed with the level of engagement which is well in excess of statutory requirements.

Does the Parish Council wish to comment on the representations made to the Plan by the National Park Authority, Highways England and the Environment Agency?

UBPC recognise that the representations made at the regulation 14 stage were considered and in particular those representations made by statutory consultees in amending the Plan for regulation 16, however it should be noted that SDNP and Natural England have made recommendations that generally have been incorporated in revisions to the Plan at latter stages. Representations made by Highways England has also been addressed in this submission.

UPPER BEEDING PARISH COUNCIL



NEIGHBOURHOOD PLAN (NP) REGULATION 16

Dear Resident

You will be aware that we recently published our Draft NP and sought feedback from yourselves and Statutory Consultees (such as SDNPA, Southern Water, WSCC, HDC etc.). All responses have been published on our website <http://upperbeeding-pc.gov.uk/neighbourhood-plan/latest-news-documents/> and been considered in producing the Final NP and associated documents for submission to HDC as part of Regulation 15 for HDC to manage and distribute for further comments as part of Regulation 16.

Copies of the Upper Beeding Neighbourhood Plan and supporting documentation are available to view on the HDC website: www.horsham.gov.uk/planningpolicy/planning-policy/currentconsultations
Hard copies of the documentation are available upon prior request for inspection at Horsham District Council offices; Parkside, Chart Way, North Street, Horsham, RH12 1RL. They will also be available at the:

- Upper Beeding Newsagent High St. UB BN44 3JA
- Upper Beeding Baptist Church the HUB Café 19 Church Lane UB BN44 3 HP
- Nisa Supermarket 5 – 9 Hyde Square UB BN44 3JE
- Upper Beeding Parish Council Office r/o 3 Hyde Square UB BN44 3JE
- Henfield Parish Council Office, Henfield Hall, Coopers Way Henfield BN5 9DB
- Small Dole Post Office, Henfield Road, Small Dole BN5 9XT

We will also be holding Drop In Sessions where members of the NP Team and Parish Councillors will be available to clarify any points, answer questions, present the Plan and the Policies in more detail and explain the benefits of having a NP supported by the community.

Drop-In Sessions

9th March 2019 – Small Dole Village Hall 14.00 – 16.00

14th March 2019 – The Hub 10.00 – 12.00

16th March 2019 – Beeding and Bramber Village Hall 13.00 – 15.00

All welcome

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