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210210 LBNP Reg 16 NP Repts - Glayde Farm FINAL



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Dear Sir / Madam

**Representation to the Regulation 16 Lower Beeding Neighbourhood Plan Consultation
LAND AT GLAYDE FARM, LOWER BEEDING**

This representation is made on behalf of our client Millwood Designer Homes and responds to the Regulation 16 Lower Beeding Neighbourhood Plan (LBNP) consultation, which is open between 17th December 2020 and 11th February 2021. This representation is made with regard to the Land at Glayde Farm, West of Church Lane, which has been allocated for the development of 14 dwellings under Policy 9 of the draft LBNP. Millwood Designer Homes supports the allocation of this site.

These representations follow earlier representations to the Regulation 14 LBNP Consultation in winter 2019.

In accordance with Paragraph 37 of the National Planning Policy Framework (NPPF) "*Neighbourhood plans must meet certain 'basic conditions' and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.*"

The Basic Conditions are contained in the Planning Practice Guidance (PPG), the Localism Act (2011) and paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). These are:

- a) *having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,*
- b) *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,*
- c) *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,*
- d) *the making of the order contributes to the achievement of sustainable development,*
- e) *the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),*

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- f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and*
- g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.*

This letter sets out our initial feedback on the NP to ensure that the Basic Conditions can be met as the LBNP progresses through the next stages of consultation and then onto examination.

Millwood Designer Homes

Millwood Designer Homes (MDH) is an award-winning UK developer with an established reputation throughout the South East for its masterful interpretation of local vernacular architecture, especially its Wealden Hall House styles. They build a broad range of housing types, paying close attention to the details which result in homes that sit very comfortably within their surroundings. They endeavour to provide high-quality homes that will offer people the right size, style, comfort, practicality, innovation and beauty.

The Site

The land at Glayde Farm currently comprises circa 1 hectare (ha) of agricultural land to the rear of the dwellings that front onto Handcross Road, as shown in Appendix 1. It is referred to as 'Field B' within the LBNP.

The flat site is bounded on three sides by a mature hedgerow with its southern boundary comprising the back gardens of the dwellings located on Handcross Road. Additional agricultural land surrounds the east, north and west of the site. Access can be obtained from Handcross Road or potentially Church Lane. A Public right of way (PRoW) is situated adjacent to the western boundary and links to an adjacent PRoW on to the south of Handcross Road. The site falls entirely within Flood Zone 1.

The site lies outside the High Weald Area of Outstanding Beauty (AONB) and the Crabtree Conservation Area. There are no international or national nature conservation designations on the site.

A bus stop is within walking distance of the site and provides services to Horsham and Haywards Heath. A primary school and a public house are also within walking distance from the site.

A Grade II listed Church is located to the south west of the site. The importance of its protection and conservation is recognised by MDH and will be considered within future development proposals.

The site was assessed as part of a larger 6.29 ha area of land. The LBNP Land Availability Assessment (LAA) 2018 notes that the northern area of this land falls sharply away, was considered to be remote the built up area boundary (BUAB) and held a rural character which is not suitable for development. In contrast, the Assessment concluded that the southern field parcels adjoin the BUAB and are in close proximity to services in Lower Beeding. Development of the southern parcels can be seen in context of the existing residential dwellings. It was also noted that the northern and western boundaries of the southern field require suitable landscaping and buffering to mitigate against any visual impacts and Millwood Designer Homes will incorporate this into the proposal brought forward.

It is important to note that the land to the east of the site is also available for development if Lower Beeding Neighbourhood Plan Group (LBNPG) are minded to allocate further homes. This land is identified in Appendix 2. Additionally, the land to the east will be required to provide sufficient and safe access from the B2110 (in accordance with Draft Policy 9) and thus will form part of the red line of any application that comes forward.

Observations on the Regulation 16 Draft Neighbourhood Plan, Basic Conditions Statement and Evidence Base

Compliance with The National Planning Policy Framework (NPPF)

In order to meet the Basic Conditions a Neighbourhood Plan must not constrain the delivery of the NPPF objectives. Achieving sustainable development is the fundamental objective of the NPPF and so it is integral that the LBNP supports this.

MDH are pleased to see that the NPPF has been considered and referenced throughout the LBNP in relation to most policies. However, the emphasis on how the LBNP contributes to the achievement of sustainable development is not overly clear.

It is recommended that LBNPG revisit the LBNP to provide information on how the LBNP has placed sustainable development at the heart of the plan.

Compliance with adopted Local Plan

NPPF paragraph 13 sets out that a Neighbourhood Plan should support the delivery of strategic policies set out within the Local Development Plan. Furthermore, Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies as set out in NPPF paragraph 29.

Paragraph 009 (Reference ID: 41-009-20190509) of the PPG explains that *“although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested”*. Thus to meet the basic condition the LBNP must conform with the adopted Horsham Development Planning Framework (HDPF) whilst considering the evidence and reasoning of the emerging Horsham Local Plan (eHLP). MDH are mindful of the how the emerging Horsham Local Plan (eHLP) and the LBNP relate to each other.

Section 7 of the BCS sets out how the LBNP is in general conformity with the policies of the HDPF and the draft policies of the eHLP. However, it is not clear where the LBNP has used the reasoning and evidence informing the eHLP to inform the LBNP within the BCS. It is noted that that section 11 of the LBNP lists several evidence based documents from various resources which could include eHLP evidence.

Recommendation: That the LBNP and the BCS set out clearly how the emerging evidence base has been used to inform the LBNP. Without this, there is a risk that the LBNP may not meet the basic conditions and/or will become quickly superseded by the eHLP.

Local Housing Need

Neighbourhood planning bodies are expected to work proactively with local planning authorities throughout the process of determining their own housing requirement as set out in paragraph 105 (ref: ID: 41-105-20190509) of the PPG. Paragraphs 5.13 – 5.15 set out how the LBNPG have worked with HDC to understand the housing requirement in the area. Further evidence is provided in paragraphs 5.19 – 5.22. MDH are supportive of this approach but consider that further evidence is required to explain how the proposed housing requirement accords with the evidence base of the eHLP.

Recommendation: That the LBNP or BCS explains how the housing required uses the evidence base of the eHLP to inform the housing requirement.

The LBNP allocates a total of 45 residential dwellings on specific sites (Policies 6-9). The remaining six dwellings are proposed to be delivered through windfall sites. NPPF paragraph 70 states “*where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply*”. It is acknowledged that the paragraph 5.50 of the LBNP explains that Lower Beeding has a strong history of delivering windfall development. However, it is not clear what this evidence is or where it has been published.

It is considered that the full housing requirement should be allocated through the LBNP and windfall sites should be in addition to this. Windfall sites can provide sufficient flexibility for potential changes in the future if required, in accordance with the NPPF paragraph 11.

Additionally flexibility should be included within the Neighbourhood Plan wording to not only ensure consistency with the Horsham District Planning Framework (HDPF), but also to account for any additional uplift for housing across the District included within the eHLP.

Recommendation: That the LBNP allocates the entire housing need (51 units) and allows windfalls sites to come forward where they meet the requirements of the NPPF, the LBNP and the adopted Horsham Local Plan. That adaptive wording is included to read “at least 51 units” to allow for changes in the eHLP prior to its adoption.

Draft Policy 9: Land at Glayde Farm (Field B)

MDH are supportive of the amended wording included in Draft Policy 9, point 9. This takes on board our previous comments set out in our Regulation 14 Neighbourhood Plan representation. It expands upon the retention of existing mature hedgerows allowing for a section to be removed if there is a demonstrated need for this.

It should be noted that the land to the east will be required to provide sufficient and safe access from the B2110 in accordance with point 9 of Draft Policy 9.

Observation: That the land to the east of the allocated site will be required to provide access from the B2110. This land could also be used for further housing development and would provide a better character for the access road.

Draft Policy 11: Housing Mix

As previously raised, Draft Policy 11 seeks development proposals for residential development which seek to include a mix of dwelling types and sizes to meet local needs as indicated in the most recent survey. Currently, the AiRS Survey requires 40.2% of 2/3 bedroom bungalow. Notably, MDH has additional land (south-eastern parcel shown on Figure 2) to accommodate bungalows should the LBNPG wish to see the delivery of bungalows in the village. Bungalows in this area would provide a soft and enhanced settlement boundary which would improve the entrance to the village on Handcross Lane. This would meet the strategic objectives of the LBNP.

In addition to this it is considered that the Neighbourhood Plan should remain in accordance with the wider Strategic Housing Market Assessment (SHMA) evidence base and any updates to it. This ensures that the Plan is not only reactive and relevant to market requirements, but it also ensures coordination with the Horsham Local Plan once adopted.

Observation: The land to east of Draft Policy 9 is available for bungalows if LBNPG require additional land for this housing type.

Recommendation: That the LBNP includes wording to link its policies with the Horsham SHMA and any updates, providing for future flexibility through adaptive policy wording.

Conclusion

MDH are fully supportive of the allocation of the Land at Glayde Farm under Draft Policy 9. This Site is available, developable and deliverable and MDH can ensure the development of the site will make a valuable contribution to the village.

These representations have provided observations and recommendations for the LBNPG to consider. Following the uptake of our recommendations, MDH considers that the LBNP meets the Basic Conditions and an examiner will be able to reach a positive conclusion.

MDH would like to thank the LBNPG and HDC for the opportunity to comment on the Regulation 16 LBNP.

Yours sincerely




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