

27th June 2019



neighbourhood.planning@horsham.gov.uk
<<by email>>

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Dear Sir/Madam,

Re: Southwater Neighbourhood Plan – Regulation 16 Consultation Comments

Introduction

Christ’s Hospital Foundation (hereafter referred to as the “Foundation”) would like to thank the Southwater Neighbourhood Plan Steering Group (SNPSG) for the opportunity to comment on the draft Southwater Neighbourhood Plan (hereafter referred to as the “SNP”). This response has been prepared by Savills on behalf of the Foundation in the Foundation’s capacity as an important local landowner, stakeholder and business.

Consultation

We note that many of the comments on Regulation 14 Draft Plan have been considered, and the Plan has been amended which is positive. However, the Foundation still has a number of concerns which are set out below. The Foundation has offered, on a number of occasions, a meeting to discuss the School, its requirements and future plans. To date, no one from the SNPSG has taken up this offer which is disappointing. Stakeholder meetings are a good opportunity for both parties to understand each other’s specific requirements, and are generally beneficial. They are actively encouraged in preparing Neighbourhood Plans¹.

Background

The Foundation is a registered charity. The principal objective of the Foundation is to aid the advancement of education for children, principally for the benefit of those who have social, financial and other specific needs. The assets and endowments of the Foundation are therefore used to support more than 600 bursary places at the school. The ability of the Foundation to meet the financial needs of the school depends critically on significant funding to grow the endowment and increase investment returns.

Christ’s Hospital School is a private institution but allows limited public access to some of its facilities such as Bluecoat Sports Centre, the Chapel and Theatre. It is important that the School is allowed to retain its privacy for the safety and security of the pupils and staff.

¹

https://www.ourneighbourhoodplanning.org.uk/news/2017/12/15/What_are_the_most_common_pitfalls_of_neighbourhood_planning_and_how_can_they_be_avoided



Policy Comments

This section sets out the Foundation's comments on the SNP.

Policy SNP1 – Southwater's Core Principles

The importance of Christ's Hospital Station is recognised in point (h) which states that Christ's Hospital Railway station provides key transport links and can therefore facilitate sustainable development. The policy should be amended so that it recognises the importance of Christ's Hospital settlement, and actively encourages development around the station.

Policy SNP7 Formal/Informal Sports Areas

The SNP designates a number of the Foundation's playing fields as formal/informal sports areas. There is no recognition that the Foundation is a private institution. It is not considered reasonable that such a restrictive policy be placed on the Foundation's private land over which the public do not currently have access. Point (1) also requires 'better' facilities to be provided in the event of any development, which is not considered reasonable.

It is also stated that where development on formal/informal sports areas would conflict with the criteria in policy SNP7, it should be in the overwhelming interests of the Southwater community. However, this is private land which the community does not have a right of access to so it would be unreasonable to make this request as it could restrict the Foundation's future operations. For example, if the Foundation wanted to develop part of a playing pitch for a new school building.

SNP10 Residential Space Standards

Part SNP10.1 is not necessary as it repeats National Policy and guidelines.

SNP12 – Outdoor Play Space

This policy requires major developments to provide play space. However, there is no evidence base to justify the need for additional play spaces in the Parish. This policy should be evidenced or omitted.

SNP13 – Enhancing our Non-Motorised Transport Network

This policy ignores the significant potential that Christ's Hospital Station (one of the Parishes major assets) offers with its good rail connections, and potential to encourage sustainable modes.

SNP17 – Site Levels

This policy is prescriptive where it sets out specific dimensions and gradients for new development (SNP17.3). Each site will have different physical characteristics. It is therefore not reasonable to take such a prescriptive approach. The policy should be amended to reflect this.

SNP18 – A Treed Landscape

This first paragraph of this policy is unclear and potentially onerous where it states: '(regardless of land ownership)'. This should be clarified. Furthermore, the policy states that trees or new woodland of *greater environmental value* should be provided. It is unclear what is meant by *greater*. It will make the development management process more difficult if this is left vague and undefined. Part SNP 18.3 refers to providing a new tree for every 40 sq m of floorspace. This policy would be difficult to deliver where it relies on third party land ownership. It is also unclear whether the requirement to pay for additional trees goes beyond the requirements of Section 106 in requiring monies to pay for new trees (as opposed to simply mitigating the impact of new development).

SNP19 – Parish Heritage Assets

This policy places a requirement for developments affecting a parish heritage asset to provide the level of information (e.g. a Heritage Statement) normally required for a designated heritage asset (e.g. statutorily listed building). This is onerous and puts an unnecessary burden on developers and landowners which would be disproportionate and costly.

SNP20 – Assets of Community Value

It is possible that private assets including land and buildings will be designated as Assets of Community Value (ACV). The accompanying paper dated November 2017 entitled 'Assets of Community Value' lists Christ's Hospital School and the Bluecoat Sports and Fitness Clubs as potential ACVs.

It is foreseeable that the School may wish to undertake some work that would only be of benefit to the school (e.g. a new private school building) which could affect (a yet to be designated) ACV. This would trigger the need for the development to have benefit to the local community which is not reasonable or practical. The policy should be amended to be less onerous.

SNP21 – A Growing Economy

No provision has been made for new employment space. The Foundation is promoting land around Hop Oast roundabout which has been identified as a deliverable site (in the site assessments evidence base). The Foundation is promoting this site through the Local Plan as a commercial use (e.g. drive-thru, small hotel, etc.) because of its location next to the A24. The Foundation wishes to see it included as an allocation in the SNP. It is encouraging to see the site assessment report identify the site as follows:

'This site could be suitable for non-residential development, if there is a need for such an allocation in the Parish.'

The Foundation would like to request that the site is given an allocation and appropriately worded policy to identify the site as being a potential location for commercial development.

Policy SNP 21.3 states that: *Outside Key Employment Areas and Parish Employment Areas, small scale business units are supported where they are in accordance with the development plan.*

It is recommended that this is changed to as follows:

Outside Key Employment Areas and Parish Employment Areas, small scale business units are supported where there is an identified need.

Built-Up Area Boundary

The SNP recommends a number of changes to the Christ's Hospital settlement boundary. The rationale for the changes is set out in the accompanying evidence base document entitled 'Built-Up Area Review.' Three changes are proposed around Christ's Hospital all of which would reduce the Built-Up Area Boundary (BUAB) of Christ's Hospital. The Foundation is unclear under what provisions the Neighbourhood Plan can bring forward these boundary changes as there are no policies in the Horsham District Planning Framework that allow for this. Notwithstanding, the Foundation has a number of other comments which are set out below.

Firstly, Horsham District Council has recently undertaken a review of settlement boundaries as part of their Local Plan review. Through this process, no need to amend the BUAB around Christ's Hospital has been identified.

Secondly, figure E (Appendix A) of the Landscape Sensitivity Study (LSS) shows a much wider BUAB for Christ's Hospital denoted as blue shading. The evidence base therefore indicates a larger boundary may in fact be more appropriate. It is also concluded in the LSS that the settlement can support additional development

which means a reduction in the BUAB is contrary to the evidence and base, illogical and arbitrary (please refer to extract below from LSS).

25-100 units(1 to 4Ha) = yes, potentially, where well related to the development pattern and where visual effects to other landscapes would be minimal

Thirdly, the Foundation has recently achieved planning consent (ref: DC/19/0423) for some of the land which is proposed to be removed from the settlement boundary (identified in Appendix B). The Parish Council commented on the scheme and raised no objection (please see Appendix C). Now that the scheme has planning permission, this means that only a small area of land would be removed (referred to as area 34 in the review of Public Open Spaces) from the BUAB, which already has a proposed designation for a Local Green Space (which restricts development).

Fourthly, the proposed changes would split the settlement of Christ's Hospital into two smaller settlements which is not consistent with other settlements in the HDPF.

Fifthly, there is no need for the proposed boundary reduction to the east. If anything it should be expanded to include the property to the east of the existing settlement boundary (please refer to Appendix B).

Conclusion

The Foundation would like to thank SNPSG for the opportunity to comment on the draft SNP. The Foundation would like to reiterate its offer of a meeting to discuss some of the issues identified in this letter. Should you want to meet with the Foundation's representatives to discuss this letter, we would be more than happy to do so.

Yours Sincerely,



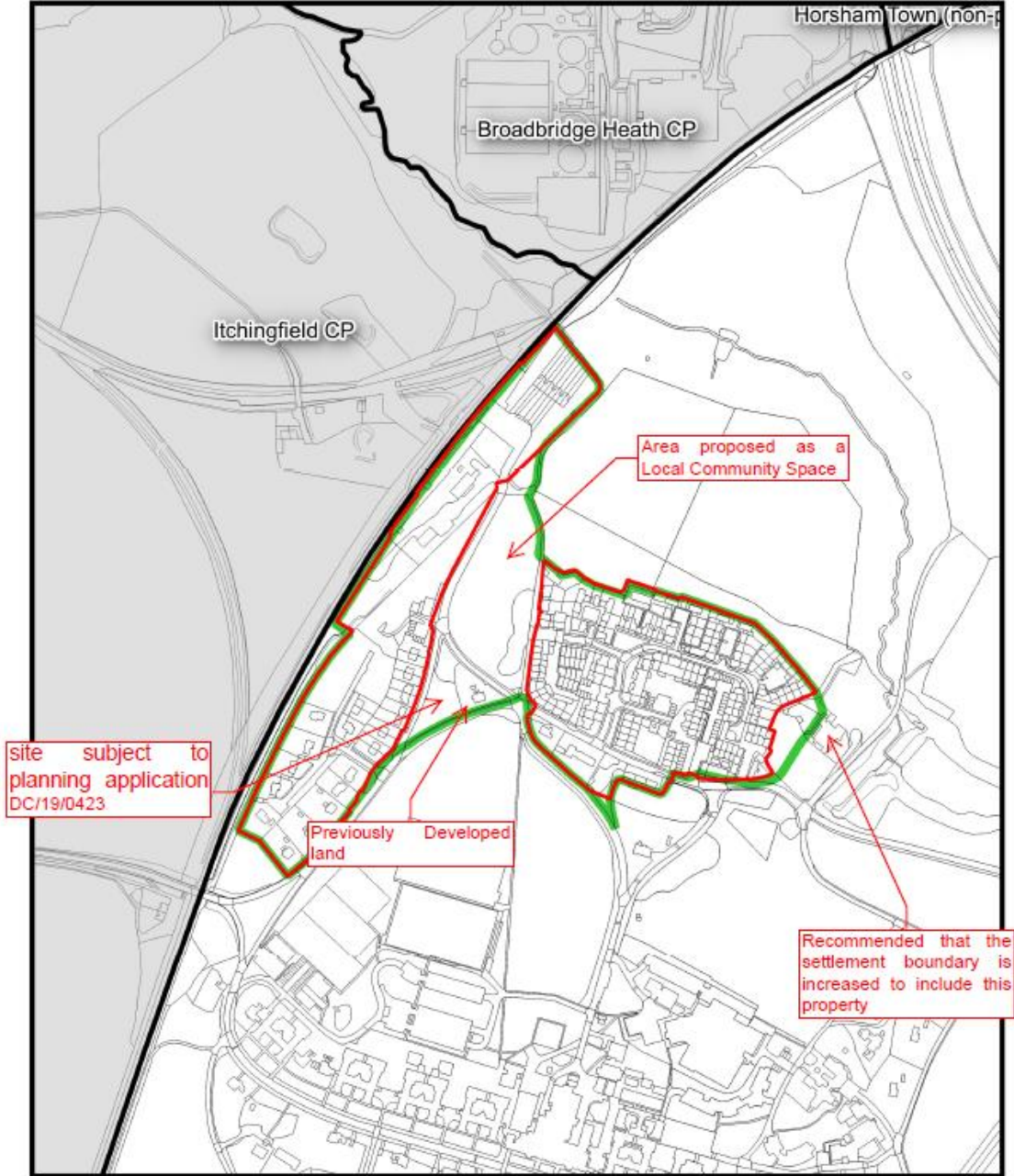
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Appendix A – Figure E from Landscape Sensitivity Study



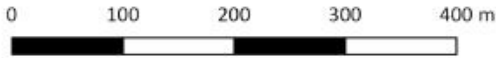
 Christ's Hospital

Appendix B – Savills comments on Proposed Built-up Area boundary amends



Christ's Hospital Built-Up Area Boundary Review

- Proposed Built-Up Area Boundary
- HDPF Built-Up Area Boundary



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