



**Horsham
District
Council**

Representation Form

Southwater Neighbourhood Plan 2019-2031

The Neighbourhood Planning (General) Regulations 2012 (as amended) - Regulation 16

Southwater Parish Council has prepared a Neighbourhood Development Plan (SNP). The Plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. In accordance with Regulation 16 of the Neighbourhood Planning Regulations 2012 (as amended), the SNP and associated documents will go out to consultation (**Friday 7 June to Friday 19 July 2019**) for 6 weeks inviting representations on the draft submission plan, basic conditions statement, consultation statement and the Strategic Environmental Assessment (SEA).

Copies of the Southwater Neighbourhood Plan and supporting documents are available to view on the Horsham District Council's website:

<https://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 between 9am and 5pm Monday to Friday. Please see Public Notice for other locations and opening times.

All comments must be received by 5:00pm on Friday 19 July 2019

There are a number of ways to make your comments:

1. Please use the above web address above to make your representation online ; or
2. Complete this form and email it to: neighbourhood.planning@horsham.gov.uk ; or
3. Print this form and post it to: Neighbourhood Planning Officer, Horsham Council, Parkside, Chart Way, North Street, Horsham, RH12 1RL

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by Horsham District Council in line the Data Protection Act 1998 and General Data Protection Regulations. Horsham District Council will process your details in relation to this preparation of this document only. For further information please see the Council's privacy policy: <https://www.horsham.gov.uk/privacy-policy>

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	[REDACTED]
Address	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	Berkeley Strategic
Position (if applicable)	[REDACTED]
Date	19 th July 2019

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	SNP1 – Core Principles
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:
<p><u>Introduction</u></p> <ol style="list-style-type: none"> Berkeley Strategic Land Ltd ('Berkeley') welcomes the opportunity to comment on the Submission Version Southwater Neighbourhood Plan (March 2019) ('the Neighbourhood Plan'). Berkeley has an interest in the existing Broadacres development to the west of Worthing Road, Southwater, which has planning permission for 594 dwellings. Berkeley also has an interest in land to the west of Southwater, totalling 347 acres, where there is potential for additional development to be delivered in order to meet the future housing and infrastructure needs of the area. Approximately 54 acres of the land controlled by Berkeley is allocated for development under Policy SNP2 of the Neighbourhood Plan. <p><u>Policy SNP1 – Core Principles</u></p> <ol style="list-style-type: none"> Berkeley supports Policy SNP1 which refers to residential development and sets out that developments of more than 10 residential units should be within reasonable walking distance of Lintot Square or be able to easily access Lintot Square using public transport networks. However, this policy does not make land beyond this area inherently unsustainable or unsuitable for development, particularly having regard to the likely future development needs in Horsham District to be established through the new Local Plan and the ability to provide new infrastructure to support sustainable patterns of development.

What improvements or modifications would you suggest?

(Continue on separate sheet if necessary)

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	SNP2 – Allocation for Residential Development
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

Policy SNP2 – Allocation for Residential Development

1. Berkeley has no objection to the identification of land west of Southwater for development in the Neighbourhood Plan in order to meet the Parish's share (stated in the Neighbourhood Plan to be a minimum of 422 homes) of the 1,500 homes that need to be allocated by neighbourhood plans across the district as set out in the adopted Horsham District Planning Framework 2015 (Policy 15). The site is available for development and is developable.
2. Berkeley welcomes the identification of 422-450 homes in Policy SNP2. The requirement for 422 homes should be treated as a minimum, while 450 homes should be expressed as an approximate figure rather than a 'cap' in paragraph 4.12 so as to provide flexibility and preserve the ability for the best use to be made of this site to deliver sustainable development.
3. There is a small additional area of land adjacent to the allocated area that is developable and should be included within the proposed Neighbourhood Plan site allocation. This area of land is located between the Broadacres development and the proposed allocation. The logic of including this land in the allocation is explained further in relation to the Neighbourhood Plan Policies Map below.
4. Berkeley has the following detailed comments on the proposed wording of Policy SNP2.
5. SNP2.1 refers to the provision of 'a minimum of 8 hectares of public open space'. Prior to the detail design of the site being completed it is considered that the imposition of a ridged policy requirement such as this is unjustified. The wording of this part of the policy should be amended to refer to 'approximately 8 hectares of public open space' so as to provide design flexibility. It should be noted that the provision of this quantum of public open space is not required to meet open space standards, but is rather derived from a requirement to provide an appropriate open space buffer around the listed building at Great House Farm. The amount of open space required to provide this buffer is an approximate pending the completion of a heritage impact assessment at planning application stage.
6. The final sentence of SNP2.1 should therefore be amended to read as follows:

"The site shall provide approximately 8 hectares of public open space."
7. The opening sentence of SNP2.2 states that 'Development proposals on this site must (our underlining) meet the following criteria to be considered acceptable.'

8. This wording is regarded by Berkeley as being overly prescriptive in that it does not provide sufficient flexibility for the development to propose a different approach to the criteria set out in SNP2.2, which on balance, may be judged by the local planning authority to provide a better development solution.
9. To provide some flexibility in the wording of this policy it is suggested that 'must' should be replaced with 'should' so that the first line of SNP2.2 reads as follows.

'Development proposals on this site should meet the following criteria to be considered acceptable:'

10. With regard to Berkeley's wider land interest of 347 acres, there is potential for further strategic development to take place to the west of Southwater and the potential for this will be considered over the longer term through Horsham District Council's new Local Plan, expected to be adopted in 2021. The rest of the land under Berkeley's control is located immediately to the north of the land proposed to be allocated under Policy SNP2.
11. The new Horsham District Local Plan will represent the next phase of planning for the district to respond to longer term development needs beyond the timescales and scope of both the Horsham District Planning Framework 2015 and the Neighbourhood Plan.
12. From a legal stand point the Horsham District Local Plan will, once adopted, replace the Horsham Planning Framework 2015 and would represent a more up to date policy position than a previously adopted Neighbourhood Plan.
13. In this context, the development of the land included in the Neighbourhood Plan under Policy SNP2 could represent the first phase of a larger strategic development. Therefore, the Neighbourhood Plan allocation must not prejudice a potential future strategic development, the consideration of which will form part of the Horsham District Local Plan preparation process. This approach would reflect the requirements of the existing Horsham District Planning Framework 2015 (Policy 4) which states that development outside settlement boundaries should not prejudice comprehensive long term development. To ensure it is in conformity with this part of the Horsham District Planning Framework, the Neighbourhood Plan would benefit from a similar policy provision within Policy SNP2.2, as follows:

1) New development should not prejudice potential comprehensive longer term development.

What improvements or modifications would you suggest?

It is suggested that the following modifications are made to Policy SNP2:

- 1) Paragraph 4.12 should refer to 450 homes as an approximate figure rather than a 'cap'.
- 2) The final sentence of SNP2.1 should be amended to read as follows:

"The site shall provide approximately 8 hectares of public open space."

- 3) The first line of SNP2.2 should be amended to read as follows.

'Development proposals on this site should meet the following criteria to be considered acceptable:'

4) The following criteria should be added to the end of Policy SNP2.2:

1) New development should not prejudice potential comprehensive longer term development.

(Continue on separate sheet if necessary)

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	SNP3 – Safeguarding of land for secondary school
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

1. Berkeley supports in principle the safeguarding of land for a secondary school or all-through school as proposed by policy SNP3. However, Berkeley wishes to make clear that, whilst the Neighbourhood Plan can safeguard land for the future provision of a school, it cannot justifiably require the provision of the land for the school in connection with the limited number of new homes it is proposing to allocate.
2. At this stage Berkeley does not object to the general location of safeguarded land. However, the precise extent of land required for the school will need to be determined in due course following detailed design. In addition, the safeguarding policy will need to be applied with flexibility to permit the delivery of enabling infrastructure, such as highway access, within the safeguarded area.
3. The overall approach to safeguarding and the policy wording of Policy SNP3 appears to be acceptable on this basis. However, paragraph 4.22 of the Neighbourhood Plan implies that a school may need to be delivered in connection with the growth set out in the Neighbourhood Plan.
4. Berkeley considers that the need for a secondary (or all-through school) is a strategic matter, which should be considered through the District Council's emerging Local Plan process in due course. This is acknowledged at paragraph 4.23 of the Neighbourhood Plan.

What improvements or modifications would you suggest?

(Continue on separate sheet if necessary)

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	SNP9 – Home Standards
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

1. Policy SNP9 mandates the use of part M4(2) of the Building Regulations.
2. As the policy notes, this is an optional part of the Building Regulations. Additionally, this is not a requirement of the Horsham District Planning Framework.
3. Therefore, Berkeley suggests that this policy is amended as follows:

SNP9.1. To provide homes that are fit for all ages, developers will be encouraged to deliver new dwellings (regardless of size, type or tenure) that achieve M4(2) of the optional requirements in the Building Regulations.*

SNP9.2. Where an extension is proposed, that new part of the dwelling should so far as reasonably possible conform to M4(2) of the optional requirements in the Building Regulations.*

SNP9.3. These measures will be secured by condition on any permission granted.

What improvements or modifications would you suggest?

See amended wording above.

(Continue on separate sheet if necessary)

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	SNP14 – Adequate provision of car parking
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

1. Berkeley recognises and supports the need for new development to make adequate provision for car parking and for the car parking to be well-designed. However, the policy requirements of Policy SNP14 appear to be overly detailed and prescriptive as to the way in which parking requirements should be met.
2. In Berkeley's experience a variety of approaches to car parking provision can be acceptable and support high quality place-making. For example a mix of on-plot and on-street parking can help to ensure that no single car parking solution dominates and that the right types of parking are provided for the right types of homes.
3. For example whereas parking at the side of homes, as referenced in the first part of SNP14, may be the most appropriate solution for detached or semi-detached homes, denser development, which might include terraced houses and flats, is likely to require a different solution. Berkeley agrees with the observation that some rear car parking courts built as part of planned developments in the past have proved unsuccessful. However, for flats, it may be necessary to include a parking court and these can be acceptable in some instances where they are appropriately situated and designed.

What improvements or modifications would you suggest?

1. As worded the policy does not provide sufficient flexibility to facilitate a varied mix of development and the policy should therefore be rewritten. Accordingly Berkeley's preference would be for a simpler and less prescriptive policy wording to be included.

(Continue on separate sheet if necessary)

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	SNP18 – A Treed Landscape
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

1. Berkeley objects to the requirement set out in policy SNP18.3 to provide one tree per 40 sq m of floorspace created. Whilst the intention to increase tree planting is laudable, this particular standard is too prescriptive.
2. Berkeley would support a more general requirement for new development to retain and where appropriate provide additional tree planting as part of an agreed landscape strategy. Berkeley is also committed to providing compensatory planting where trees need to be removed to facilitate new development and to achieving a net gain in biodiversity through the development proposed under Policy SNP2.

What improvements or modifications would you suggest?

(Continue on separate sheet if necessary)

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	SNP18 – Neighbourhood Plan Policies Map
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

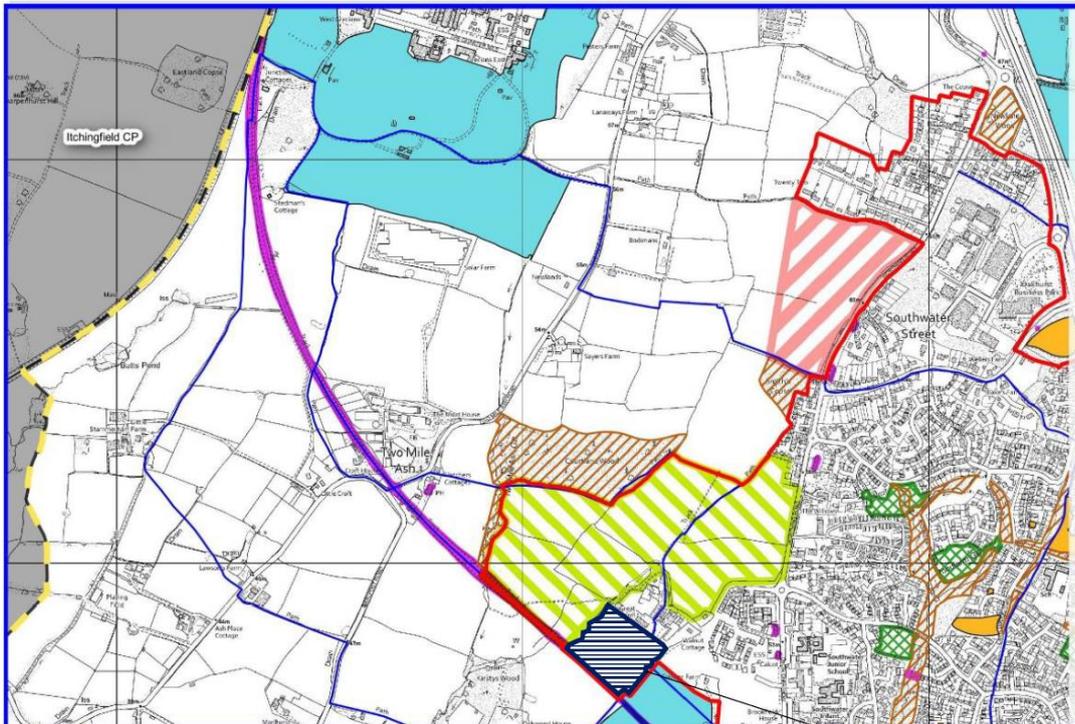
Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

1. As noted above in relation to Policy SNP2, the Neighbourhood Plan Policies Map should be altered to include within the Policy SNP2 allocation a small field located directly between the proposed allocation to the west and the existing Broadacres development to the east.
2. The Policies Map currently identifies this field as 'white land' within the proposed Built-up Area Boundary. However, this field does not form part of the Broadacres development, and as a result of its location and suitability for development, it should therefore logically be included in the allocation under Policy SNP2. The field is hatched in blue on the extract of the Policies Map below.

Policies Map Extract

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NEIGHBOURHOOD PLAN POLICIES MAP

Land to be included in allocation under Policy SNP2

What improvements or modifications would you suggest?

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

Do you wish to be notified of the local planning authority's decision under Regulation 19 of the Neighbourhood Plan (General) Regulations 2012 (as amended) in relation to the Southwater Neighbourhood Development plan?

Please tick here if you wish to be notified: