



Neighbourhood Planning
Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

Date 20 December 2019
Your ref
Our ref 0704/296724-5

Dear Sirs

**Henfield Neighbourhood Plan Regulation 16 Consultation
On behalf of Welbeck Strategic Land (II) LLP**

DMH Stallard LLP act on behalf of Welbeck Strategy Land (II) LLP (“Welbeck”) in relation to the land known as Parsonage Farm, Henfield and the identification of the site as an allocation within the Henfield Neighbourhood Plan (“HNP”). Welbeck wholly support the HNP, which is considered to meet the basic conditions, represents sustainable development and fully accords with the strategic policies of the Horsham District Planning Framework (“HDPF”) and the National Planning Policy Framework (“NPPF”).

The land at Parsonage Farm, is identified as a housing allocation for housing and open space in policy 2.1 of the HNP. The allocation identifies that the site can accommodate approximately 205 dwellings within the area shown purple on the associated plan (page 26); the remaining land, edged green, is intended to provide formal and informal open space for the enjoyment of existing as well as future residents. Policy 2.1 requires a range of appropriate criteria for the future development of the site.

Policy 1

We support Policy 1 and its positive approach to the delivery of sustainable development in accordance with basic condition (d). We support the amendments of the Henfield Build Up Area Boundary (BUAB), as shown on Policy Map 1a (page 23), to include sites identified for development and the support thereafter, for proposals coming forwards within the BUAB.

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We support the inclusion of all land promoted at Parsonage Farm for identification on Policy Map 1a, which includes land proposed for green infrastructure as part of the residential development of the land shown to be included within the BUAB. Policy 4 of the HDPF supports the expansion of settlements where the site is allocated within a Neighbourhood Plan and where it adjoins an existing settlement edge, the revisions of the BUAB to include land at Parsonage Farm is therefore wholly appropriate and in accordance with the strategic policies of the HDPF.

Policy 2 – Housing Site Allocations & Policy 2.1 Land at Parsonage Farm

Welbeck wholly support the assessment and identification of a local housing need figure and the associated housing sites required to meet those needs, as set out in Policy 2 and Policy 2.1. This meets the basic conditions required of the HNP, it is compliant with national policy as it seeks to meet and ‘significantly boost’ identified housing needs as set out in Section 5 of the NPPF; it also complies with Policy 15 of the HDPF.

Paragraphs 65 and 66 of the NPPF requires that local planning authorities establish housing requirement figures for Neighbourhood Plan areas, however, the Horsham District Planning Framework (HDPF) pre-dates the NPPF 2019 and did not prescribe housing requirements for the HNP. However, the HDPF (Policy 15) requires that at least 1,500 new homes are delivered in accordance with the settlement hierarchy, through Neighbourhood Planning. Horsham District Council (HDC) requires that Neighbourhood Plan Steering Groups undertake a Housing Needs Assessment, to identified the level of housing needs within the Parish, Henfield Parish Council have prepared a Housing Needs Assessment, which has informed the HNP. It is considered that Policy 2 of the HNP is in general conformity with the strategic policies of the development plan, including the HDPF.

The Housing Needs Assessment identified various scenarios for calculating housing needs. The Housing Needs Assessment concludes that based on the ranges provided, the housing requirement is 272 dwellings (or 19dpa) over the plan period (paragraph 28). Acknowledging completions thus far, the Housing and Development Focus Group Report 2019 identifies a residual housing requirement of 260-273 homes (paragraph 3.21). Henfield is a ‘Larger Village’, a tier 2 settlement (Policy 3 of the HDPF), it is therefore wholly appropriate that the HNP should seek to deliver against this level of housing need in accordance with the strategic development hierarchy.

In informing the site selection process, the Parish Council have undertaken significant site assessment. They undertook a call for sites and invited site proponents to present their sites to the Steering Group and local residents. The sites and initial site assessments were published at an open day and comments were invited. During the Call

for Sites process and at Regulation 14 stage, Welbeck have submitted a full suite of site assessment to assist the Parish Council, demonstrating that the site is suitable for housing and deliverable within the Plan period. These documents are enclosed.

The site assessments have been undertaken by the Steering Group and a professional planning consultant. The process has been open, honest and fair and in accordance with the NPPF. The Regulation 16 HNP is supported by a Consultation Statement 2019, which states that out of 94 respondents an overwhelming 60% supported the draft HNP, in addition to a further 17% which supported the plan subject to modification. The HNP has gone through thorough consultation with the local community and statutory consultees which has resulted in a Plan which meets the basic conditions and is supported by the local community in accordance with the principle aims of local-led planning.

The Steering Group have undertaken a robust Sustainability Appraisal (“SA”) of the site options, including varied distribution of the housing need across a number of sites. The SA identified ‘Option 5’ as being the most sustainable option, which is then followed through into the HNP. The Steering Group acknowledges that the delivery of housing can sometimes be best achieved through planning for large scale development, this wholly accords with the NPPF (paragraph 72); the land at Parsonage Farm can deliver against the local housing need, whilst delivering a range of additional benefits to the village. The robust assessment of the sites, through the site assessment process, and the testing of various ‘options’ through the SA, demonstrates that the identified strategy, as set out in the submitted HNP, contributes towards the achievement of sustainable development in accordance with the NPPF, the HDPF and basic condition 2.

The HNP and Policy 2.1 identifies land at Parsonage Farm for 205 dwellings, by allocating a larger site to meet local needs, a new access from London Road can be justified and delivered, reducing the direct impact on existing residents of Henfield and providing for a safe and direct access onto the London Road and main route into and out of Henfield. Furthermore, the delivery of 205 dwellings on a single site allows for the provision of significant open space and recreational infrastructure for both future and existing residents, including a country park, allotments (a need for which is identified within the Environment and Countryside Focus Group Report 2019) and a new children’s playspace (as identified within the Community Facilities and Infrastructure Focus Group Report 2019). It can provide a good mix of dwellings types and sizes and a policy compliant level of affordable housing, which small development proposals might fail to achieve. This range of benefits would be difficult, if not impossible, to deliver through the identification of smaller sites. The land at Parsonage Farm can deliver a range of benefits set against the needs identified by the HNP evidence base, including additional access to the countryside for existing residents. It is considered that it

represents sustainable development, in accordance with the NPPF and the basic conditions.

For the reasons set out above, Welbeck support the allocation of Parsonage Farm for housing and open space (Policy 2.1). The Steering Group (along association with the detailed Focus Groups) have undertaken significant site assessment and have assessed various options for growth through the Sustainability Appraisal. Welbeck has undertaken detailed site assessment work which has been submitted to the Council through the Call for Sites and Regulation 14 consultation process, demonstrating the suitability and deliverability of the scheme (and is enclosed). The HNP evidence base, which is largely prepared by specialist consultants, includes a detailed site assessment of each site submitted, including the 2 options for land at Parsonage Farm (Site X and Site Xa). Welbeck support the site assessments, which reasonably concludes that whilst the site would have a negative impact on landscape, on the basis that it would represent development of green fields, Site Xa – land at Parsonage Farm, would otherwise result in positive impacts on other objectives, particularly sustaining the village hub, providing against local housing and infrastructure needs, delivering new community infrastructure and protecting environment, biodiversity and local green infrastructure.

In summary, the SA acknowledges that the delivery of the site would have a broad range of positive outcomes, whilst maintaining the amenity of existing residents. Figure 4 of the SA concludes that development land at Parsonage Farm (Site Xa) for housing would have a neutral or positive impact, it is the only site outside the current BUAB to achieve a positive assessment.

Following the Regulation 14 consultation, an Addendum to the SA has been undertaken, this undertakes an appraisal of alternative sites and development options (7, 7a, 8, 9 and 10). Section 4 of the SA Addendum provides a summary of the SA/SEA objectives and the performance of each of the options. These additional options perform negatively against many of the SA/SEA objectives, consequently, the SA (at Section 4) dismisses these options in favour of the previously selection 'option 5', which remains the most favourable of the options which seeks to deliver against full local housing needs. Welbeck welcome the Steering Group's robust approach to testing alternative strategies and support the concludes of the SA and the SA addendum.

Summary

Overall, Welbeck commend the HNP Steering Group for their significant inputs into the Neighbourhood Plan process, resulting in a robust and policy compliant Plan, which accords with the basic conditions.



The HNP is based on a strong evidence base, including evidence supplied by site proponents, including Welbeck. It is welcomed that the Parish Council has been confident in its selection of sites, acknowledging an appropriate and justified level of housing required for the Parish, and then selecting the appropriate sites to meet those needs, noting that larger sites can often deliver greater local benefits.

It is understood that the HNP may be examined through the Hearing process, please note that Welbeck would welcome participation in the process. Please contact Katie Lamb, Director of Planning, on 01293 605192 or katie.lamb@dmhstallard.com.

Yours faithfully

DMH Stallard LLP

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Enclosures: Site Plan
Concept masterplan
Transport Technical Note & Accessibility Walking Route Map
Drainage Technical Note
Landscape Visual Appraisal & technical appendices