



# Ashington Parish Council

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18th September 2023

**F.A.O. Horsham District Council Planning Department**

**Ref: Planning application -**

**DC/23/0406 - Land To The West of Ashington C of E School**

Dear Sir/Madam,

We write with regards to the above mentioned planning application, and in response to the additional information and amended plans received by Horsham District Council from Savills obo Bellway Homes. We understand all recent correspondence is in response to the extensive consultation responses that Bellway Homes have received to date. The revised plans were discussed at the Ashington Parish Council meeting on Thursday 14th September 2023.

As the Ashington Neighbourhood Plan (ANP) has not been reviewed since it was adopted by Horsham District Council (HDC) in June 2021, we consider that the information, objectives, strategies and policies contained within it should be considered current and therefore be adhered to by the developers.

The parish council are very disappointed to see that the revised information provided is "conspicuous by its absence" with regards to responses to many issues raised previously by the council.

The parish council are also disappointed that the developers have chosen to seek out village organisations to effectively "negotiate" with them to try to modify the provision of amenities that they are required to provide within the scope of the ANP. The organisations they have singled out do not represent the views of the parish council, therefore they have entered discussions with Bellway Homes purely for their own reasons, whether it be for financial investment or enhanced assets. This approach undermines the integrity of the ANP.

Further to the submission of our formal response in April 2023 to the planning application, we have not received any correspondence from Bellway Homes to further discuss our response to their application and are therefore surprised that they have since sought the advice from other village organisations rather than actively engaging with the parish council first. All local organisations were consulted extensively in the 5 ½ years before the ANP went to referendum and therefore their views were taken into consideration when the ANP was developed.

Please find below our response to the information contained within the letter from Savills (abridged in places for clarity) and our original response to the planning application, with issues highlighted that have not been addressed or responded to.

**Ref: letter from Savills to Nicola Pettifer, HDC Planning Department, dated 18th August 2023 and all supporting documents on the HDC planning portal (our responses in red)**

### **Proposed Development and Heritage**

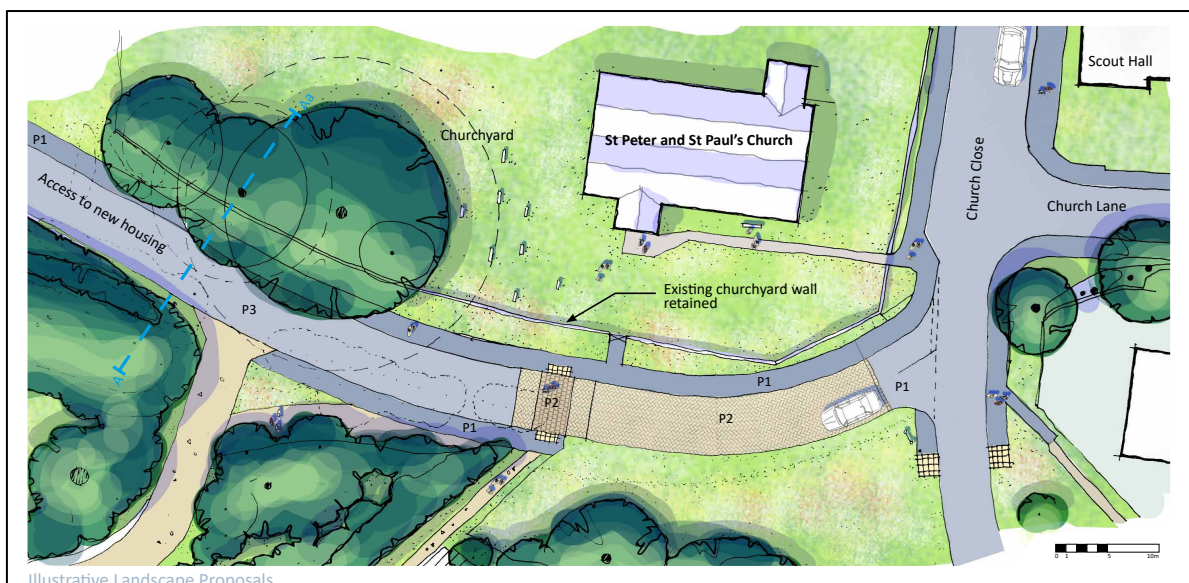
Unfortunately, there was an error on the original drawing which showed the land falling in the wrong direction. Drawing No. BEL-SL-SITE SECTION 01 is now submitted which shows that the site will fall from the south to the north.

As this area is prone to flooding, and the topography would indicate that any excess water would be likely to run down into the development rather than away from it, we would seek clarification as to whether this matter has been addressed?

Concerns about the impact of the proposed development on the listed Church has also be raised by consultees. To help demonstrate how the site access has been carefully designed to limit the impact on the setting of the church, an annotated coloured layout of the access has provided and a CGI image of the proposed development. This illustrates the proposed treatment of the access route, the retention of historic features such as the church wall and mature trees and a sensitively designed material palette. The annotated layout plan highlights that a no dig construction method would be used to ensure existing trees are not adversely impacted.

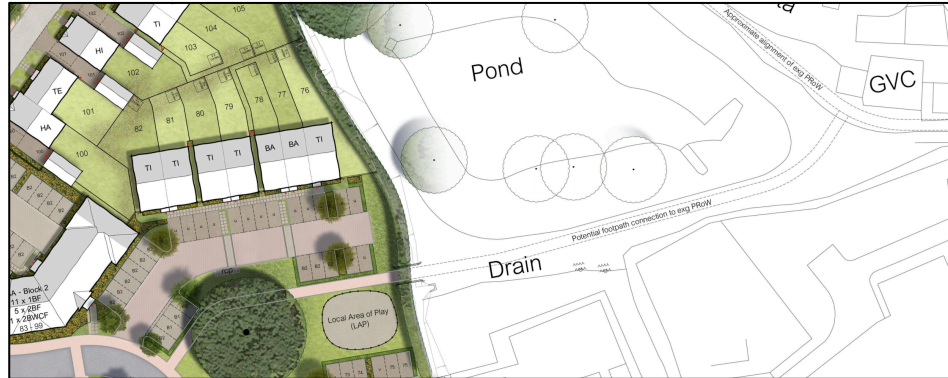
There is concern about the noise and vibration from the “rumbled block paving” so close to the church wall. As a “no dig construction” method has been proposed, we assume that by default this will necessitate a raised “speed table” type section, again that could cause noise and vibration as already happens with other roads in the village?

If the developers had amended the junction to match the previously requested staggered junction as per the ANP and WSCC Highways, this would also have moved the proximity of the road farther away from the church wall. To do this would require purchase of a small section of parish council land, and we can confirm we have not been formally approached in this respect.



### Footpath Links

To improve the pedestrian connections across the site and to the surrounding footpath network, the applicant is proposing a new connection to the east of the site. Between the site boundary and Public Right of Way FP2607, the new connection would make use of an informal path in Parish Council controlled land, before entering the site by the proposed Local Area for Play.



We note the new pedestrian connection proposed, although this has not previously been raised with the parish council despite running across our land. This footpath, if built to bridleway status as per the proposal for the rest of FP2607, will be exceedingly close to the pond and could be cause for concern, particularly given its proximity to the proposed play area.

8.16 of the ANP states -

*“Access on foot to the public open space from the eastern part of the site will be important. As part of this, the west of the site is used by Ashington Primary School for Forest School activities. The availability of this space for such activities must be retained, along with safe access on foot from the school. In addition, the school uses another area for Forest School activities to the south-west. Footpath access runs through the site so it is important that this is retained.”*

We note that a footpath connection has been removed from the southern part of the development which appears to effectively remove footpath access to the Forest Schools area and to the MUGA. It appears that children will be required to walk alongside the road rather than through a safer non road route. No reason or rationale has been provided as to why this important footpath has been removed?





### **Housing Mix**

Following our discussions, and aiming to provide additional smaller homes in the market mix of the proposed development, the applicant has updated the market mix accordingly. Nine additional 2 bedroom homes and nine fewer 4+ bedroom homes are now proposed

This is welcomed by the parish council.

### **Sports Pitches and Pavilion**

The applicant is committed to providing high quality sports facilities on the site to add to the community offer in the village in accordance with the Neighbourhood Plan. The originally submitted application included two sport pitches including a MUGA to the north west of the site and a grass pitch to the south of the site.

As noted in the applicant's response to the Parish Council comments on the planning application dated 11 May 2023; there is insufficient land within the north-west field to cater for two sports pitches located together, in conjunction with the pavilion, parking and allotments provision. The attenuation provision is necessary within the north-west field due to topography and as such, two pitches would result in a considerable loss of existing green landscaping and trees within the northern tree belt which in turn would reduce existing biodiversity.

We understand there may be additional information that has come to light since the promotion stage of the ANP, but we also consider the whole issue regarding the location of the pitches could be considered irrelevant if Bellway Homes built the 150 homes proposed in the ANP rather than 180. 30 additional homes have effectively taken away the space allocated for the 2nd pitch. The amount of land put forward for consideration for the neighbourhood plan was significantly more than the land that has been put forward in Bellway Homes proposed development. In effect Bellway Homes are proposing more development on less land, therefore the benefits that the village voted on in the referendum will be lost. Should the correct amount of land be used by Bellway Homes, and the correct number of houses be built, much of the disparity with the ANP would disappear.

To help explain this further a new plan (Drawing Number 062009-BEL-SL-SPCP) has been produced to illustrate this and shows that it is not possible to include two full size 11 a side pitches in the north west of the site. Whilst the Neighbourhood Plan envisaged it would be possible, the applicant has all available information and surveys which would not have been available at the promotion stage of the Neighbourhood Plan.

For this reason the grass pitch was proposed to the south of the site. Subsequently, Historic England has raised concerns about the position of the grass pitch and the impact on the setting of the nearby Schedule Monument and potential impact on archaeological remains. The applicant is of the view that the grass pitch would not have a significant adverse impact on these items to warrant refusal of the planning application (see the Proposed Development and Heritage section of this letter above) and appropriate mitigation could be secured.

Parish council always proposed the southern section of the site be "open space", one of the benefits the village voted on at referendum.

The following images show an early 2019 masterplan that shows the council were prepared for the loss of some of the northern tree belt (scrubland deemed unimportant for biodiversity), for the allotments. The 2 pitches are then easily collocated if the original 150 houses were built, without the additional 30 homes that Bellway Homes are proposing.



The next image shows the latest Bellway Homes proposal and the removal of habitat to the west of the site, which was in the ANP originally to create a “soft edge” to the development.



... the applicant has been in discussions with the Ashington Community Trust and it is apparent that there could be a more appropriate use of resources to improve existing facilities in Ashington and which are managed by the Trust. Policy ASH8 of the Neighbourhood Plan explains that the allocation is to provide a grass pitch on site and also to contribute to existing facilities in the village. The applicant is committed to comply with the Neighbourhood Plan requirements, however in this case there is justification to not provide the grass pitch on site and instead provide further contributions to the upgrade and maintain the existing facilities. This is because:

- The application site and on site constraints and characteristics mean that it is a challenge to provide all the non-residential uses envisaged by the Neighbourhood Plan (pitches, play areas, open space, allotments, Sustainable Urban Drainage System) within the developable area (see Drawing Number 062009-BEL-SL-SPCP) without compromising existing vegetation and habitats;

Disputed by parish council as previously noted (due to extra 30 homes).

The current Bellway Homes application is proposing removing existing vegetation and habitats from the west of the site as opposed to ANP retaining it and removal of a smaller section in the northern section.

- The village has a number of existing facilities (the Community Cluster), including sports pitches which are well used and could benefit from upgrading and maintenance; and

This is not disputed and is already in the mentioned ASH8 under Table 7.1: Provision of Community Facilities, and therefore financial contributions should not be considered as a replacement to the loss of one pitch. The provision is for a MUGA, grass pitch AND financial contributions to upgrade existing facilities. Two pitches were put forward in the ANP as the existing number of pitches that are available in the village are not sufficient for the very successful football teams in the village. This is especially the case with the junior sides who currently have to rent alternative pitches in neighbouring villages just to play matches.

It should be noted that the existing grass area is a recreational field for the use of all residents and not solely a sports pitch.

- The proposed MUGA and pavilion would be provided and the Community Trust has suggested it would be a welcomed addition to the facilities and would be well used.

On this basis, the amendments of the planning application remove the southern grass pitch from the proposal reverting to an open space area, which could be landscaped and used for informal recreation (benefiting biodiversity and existing and future residents).

The open space area is already proposed in this location in the ANP, however somewhat smaller than the area that went to referendum. Bellway Homes are proposing either a football pitch or an open space. The ANP clearly stated both, not to choose one over the other. Either way the village would be losing another benefit that was voted on at the referendum.

The applicant proposes a financial contribution in addition to any CIL payment towards the existing sports facilities in Ashington. The actual amount is to be calculated, but would be the equivalent of providing the grass pitch as previously proposed. This would ensure the proposed development is still generating the community benefits envisaged by the Neighbourhood Plan.

As previously noted, we are surprised by the engagement between the developers and the Ashington Community Centre Trust (ACCT) ahead of holding discussions with the parish council, and even more surprised that they would wish to sanction

the physical “loss” of a football pitch which would seem to contradict the needs and wishes of the existing village football clubs. It is worth noting that the ACCT is a totally independent body that has no connection with the parish council. They are not accountable to the parish council and have gone against the wishes of not only the council, but also a good many residents of the village, in their negotiations with Bellway Homes.

The ACCT do not have a mandate to speak on behalf of the village, therefore they only represent their own aspirations.

#### Sports Pavilion

The proposed sports pavilion has been amended to address the comments from Sports England. The following changes are now proposed:

- The communal showers in the players changing rooms have now been separated into individual cubicles;
- The plan has been amended to provide 2 officials changing rooms;
- Solar panels can be provided on the south facing elevation where appropriate and the plans have been updated accordingly. A separate battery storage area has been provided;
- A plant room has been designed into the building. This is accessible from the car park to facilitate servicing. It also adjoins the battery storage area;
- An office has been incorporated into the design. The office connects directly to the battery storage area which then connects to the plant room so there is a good flow route between these area uses; and
- The kitchen has been re-located in the building and now serves both the committee room as well as the outdoor amenity terrace.

The pavilion has been specifically located to the north of the sports field to reduce the amount of hard standing proposed and maintaining as much open green field space as possible to the south. It is also adjacent to the allotments to provide a convenient hub space and facilities for users of the sports field and allotments. It is also envisaged that the meeting space in the pavilion could be hired out or used for meetings outside of use for sport.

We are pleased that some of Sports England concerns have been addressed. We would of course expect any feedback from the local sports clubs to be noted also.

However, it is not clear how the one communal space can both be “hired out for meetings outside of sport use” and “provide a convenient hub space and facilities for users of the sports field and allotments”? Within the ANP was provision for a small cluster of buildings that could be used for a permanent Neighbourhood Wardens office, parish council office, youth club and meeting rooms, as well as a sports pavilion. Bellway Homes proposal is to shoehorn all into one small building that would be totally inadequate.

Another example of benefits lost that the village voted on at referendum.



### **Commercial Floorspace**

Policy ASH11 xii of the Neighbourhood Plan states:

*The provision of commercial floorspace (Use Class B1) on flexible terms, subject to meeting the requirements of Policy ASH9 (Small Scale and 'Move on' Employment Development) – this could be as part of a multi-user community facility at the Ashington Community Cluster;*

The proposed pavilion includes space within that could be hired for ad hoc meeting space outside the times it is used for sport. This would provide a flexible facility and support small businesses or people working at home who need extra space for meetings or function.

The “Club/Committee room” on revised plan 062009-PAV-P1-REVA appears to have a useable space of approx. 4m x 6m. However, as this has clearly been designed with dual aspect large opening doors and 3 storage cupboards, it is likely to be most useful as a space for use and access by pavilion users rather than a flexible working space for small businesses or home-based workers. Therefore, limited hire space as noted in previous section.

In addition to this, the application site does not include all the land in the allocation, which could otherwise be used for small scale commercial use if it become available. It is understood that the landowner is considering plans for purpose built commercial space within the allocation site, which could be found to comply with Policy ASH11 in this respect.

We as the PC are unaware of this and would respond that therefore we would not consider this to comply with ASH11 as there is no assurance that this would happen. This again is totally contrary to the ANP.

Thirdly, the applicant would be willing to contribute financially through the Section 106 Agreement to the Ashington Community Trust for them to provide updated or new office space in their facilities. It is understood from the Ashington Community Trust that the Community Centre benefits from extant planning permission for an extension which could be used for such purposes and funded in part by an appropriately and reasonable contribution through the Section 106 Agreement.

As such, there are various options available and so the applicant is willing to discuss this further with you and come to an agreement about how this is to be secured.

As noted previously, it is already part of the ANP under ASH8: Ashington Community Cluster that there should be financial contributions allocated towards existing facilities, however it is felt to be inappropriate that the developers have been holding talks directly with the ACCT regarding what they now wish to have.

It could be considered that the developers are trying to renege on many aspects of the ANP delivery by offering other options that are already in the plan.

### **Mill Lane Flooding**

Enclosed with this letter is a Technical Report dated August 23 by Ardent. This investigates the flooding issues at Mill Lane as identified by the Neighbourhood Plan and whether there could be any causal link between the proposed development and the flooding.

The Flood Risk Assessment and Drainage Strategy demonstrates that the proposed development would not result in additional flood risk elsewhere. This has been confirmed by the HDC Drainage Officer in their comments dated 13 April 2023. As such, the proposed development would not adversely impact the existing issues experienced at Mill Lane.

However, the Technical Report does recognise there is a flooding issue at Mill Lane and suggests the best way forward would be for the Local Lead Flood Authority (LLFA) to lead the investigation and access funds via the Flood and Coastal Erosion Risk Management Grant in Aid fund from the DEFRA

and the Environment Agency to undertake remedial works. A Mill Land Flood Study has already been undertaken by the appropriate body and so information is available about the issue and potential solutions.

In addition to any funding from DEFRA, the proposed development would generate a CIL liability and part of those funds could also be used to facilitate the necessary works. As noted the planning application does not include all the land identified in the site allocation. As such the proposed development does not jeopardise any flood mitigation works on this land in the event mitigation measures are proposed and lead by the LLFA.

Within the ANP great emphasis was put on alleviating a problem that has existed in the village for many years. Mill Lane regularly floods with water flowing from the stream rising in Spring Copse and The Yokebourne River. One of the benefits the village voted on at referendum was a flood relief scheme that involved a pumping station to divert the water north away from Mill Lane.

The flooding occurs even though the land that Bellway Homes propose to develop is currently agricultural land. Development would only exacerbate the problem. The site of the diversion scheme was planned to be on land that was put forward in the ANP however it is not land within the Bellway Homes proposal. Whether that is because the landowners have not offered the land to Bellway, or that Bellway are not willing to buy that land is unclear to the PC. However, there is no mention of this particular flood relief scheme anywhere in Bellway Homes proposal. It appears this is something they have completely ignored. Certainly there is mention of a balancing pond (attenuation basin) however this will do nothing to alleviate the historical village problem that the ANP addressed.

This is a significant loss of a crucial benefit to the village.

#### **Noise**

In response to the Environmental Health Comments, the Noise Assessment has been updated with regard to the noise impact from the MUGA. The MUGA will be an all weather facility. The report concludes that noise from the MUGA with appropriate mitigation in terms of the type of glazing in the new homes and trickle ventilation, will not adversely impact on residential amenity of future residents. Furthermore, the use of the MUGA can be conditioned so not to be used at unsociable hours, if considered necessary by the LPA.

Any noise issue could be mitigated by good management of the facilities, which the parish council feel that they would be best placed to oversee.

#### **Air Quality**

Ardent Engineers have been in discussions with the Environmental Health Officer in respect of Air Quality. Clarifications have been provided and the Officer has stated planning conditions can be suggested and secured.

The parish council have no comment to make.

**Ashington Parish Council OBJECT to the application**

Many of the requirements detailed in Policy ASH11 Land West of Ashington School and elsewhere in the Ashington Neighbourhood Plan (ANP) are not met by the submitted application.

**Specifically:**

**Non-compliance with ANP (Policy ASH11, approximately 150 homes) –**

1. **Developer Masterplan** - Poor design and not as presented by landowners/agents during the ANP preparation.  
**No significant change to overall plan.**  
**Removal of grass pitch, small extension to sports pavilion, additional sports pavilion storage, removal of section of footpath, proposed new footpath.**
2. **Quantum of development** - parish council does not support delivery of 180 homes ... site allocation for 150 homes should be adhered to. Provision of an additional 30 homes interferes with the ability to co-locate both sports pitches and pavilion in the NW corner of the site.  
**No reduction in housing numbers.**
3. **Housing density** - ... the application proposes 180 homes in a smaller area (approx. 14.95 hectares) than the 150 homes allocated in the ANP (approx. 18.5 hectares). Therefore, housing density is increased.  
**No reduction in housing numbers.**
4. **Exclusion of ANP land** - The application excludes land designated in the ANP as Open Space (Figure 2, hatched black areas)
  - a. ANP open space to the north-west of the site, linking to Rectory Lane is absent from the application. This was to form part of the sustainable transport routes into and out of the site and must be included.
  - b. The barns at Church Farm, to the south of the proposed access road.
  - c. Much of the open space around Church Farm House.A large corner of the Forest School site (Furzefield Copse) is also excluded from the application.  
**No explanation given. The reduction in land coupled with the increase in the quantum of houses is the fundamental problem leading to the majority of benefits that the village vote on at referendum not being delivered.**
5. **Allotments** - The provision of allotments is not as per the ANP – their proposed location interferes with the sports pitch configuration in the NW corner of the site. The applicant claims that to provide allotments as per the ANP they would need to remove trees/scrub, and this will have an impact on wildlife/biodiversity. The applicants own ecological report (conclusion para 8.3) states that “the site is dominated by habitats not considered to be of ecological importance”.  
**Allotments in same location.**



6. **Area of built development** - Retention of the scrubland in the north of the site, contrary to the ANP figure 8.2, coupled with the additional 30 homes that the application proposes, forces built development further west in the site than necessary, disregarding policy ASH11v.  
No amendment to location.
7. **Safeguarded land for School** - There is a lack of clarity in the documents regarding safeguarding of land for future school expansion. It is not clear how ANP Policy ASH11xviii and ASH11xix will be achieved. The proposed safeguarded land is outside the red line boundary of the proposed development.  
Land still outside boundary. Developers challenge the WSCC Education request that the safeguarded land increase by 20% in line with the housing numbers being increased by 20%. WSCC Education object to the application due to this discrepancy (21 June 2023). The Ashington School House Trust (landowners Ashington CE School) also object on the same grounds.
8. **Commercial floorspace** - No commercial floorspace is to be provided, contrary to Policy ASH11xii and no details are provided as to how this policy will be met.  
A limited area has now been proposed in the sports pavilion (approx. 4m x 6m?), but it is felt that the use of this to be a viable commercial space could be compromised by the need of those using the facility for sports. The access to this space would be through the main sports pavilion past the toilets, shower rooms etc, which would seem to be an unprofessional set up to be hiring out to commercial users. Poorly thought layout of the whole building, which is totally inadequate for the uses proposed and not in keeping with the ANP. No Neighbourhood Wardens office, no parish council office, no meeting rooms etc.  
  
Developer has indicated a landowner will potentially provide their own "development" for this purpose. The parish council are not aware of this.
9. **Flood mitigation works** - Non-compliance with ASH7 & ASH11xx. The submitted Flood Risk Assessment report, para 4.7, states "this development is not considered suitable to alleviate flooding in the adjacent catchments". ... The main recommendation was for a new culvert and stream diversion within Church Farm House land and this was a contributing factor in the selection of this land for allocation in the ANP. However, it now appears that the required piece of land for the new culvert is not now included in this planning application (see 3c above).  
Still not included. The large attenuation basin proposed remains on the plans. This has nothing to do with the proposed flood relief scheme that was addressed in the ANP.
10. **Sports facilities** - the provision of two full-size football pitches (one grass and one MUGA), sports pavilion & parking is welcomed but ... - they need to be co-located. A single grass football pitch in the SE of site with no parking, no toilet facilities, on land with significant archaeological constraints is likely to render this pitch almost useless. The ANP Masterplan, as prepared by landowners and parish council showed both sports pitches co-located in the NW corner of the

site and served by a single sports pavilion. At no stage in ANP preparation was a football pitch to be located separately.

Developers have removed provision on the new development for the grass pitch and propose funds instead to improve existing ACCT facilities.

Only 1 new pitch therefore proposed on development site, not 2 as per ANP. This is insufficient for village needs.

11. **Open Space** - The SE corner of land was designated as Open Space for the benefit of residents e.g. dog walking, in order to protect underground heritage assets as much as possible (see 10.).

This is now proposed by developers (already requested in ANP), although at the detriment of losing a football pitch (see 10.) The proposed open space is significantly smaller than was originally put forward by the landowners in the ANP, so much so it cannot be regarded as a significant benefit.

### **Highway Access –**

1. **Church Lane** - Prior to finalising the ANP site allocations it was necessary to demonstrate that access was deliverable especially as it required the cooperation of adjoining landowners (Church Farm and Church Farm House). The landowners jointly commissioned a Transport Assessment (<https://www.ashingtonpc.org.uk/pdf/evidence-base-regulation-14-ref-354-site-5-transport-report-36-pdf.pdf>).

This report concluded that access was indeed possible, but it raised a significant safety concern in paragraph 3.7 – “The Road Safety Audit has highlighted that proposed junction configuration could lead to an increased risk of vehicles crossing the central white line markings, which could in turn increase the risk of collisions. To address this concern, it was suggested that the new access could be moved so that the distance between the two junction is maximised.”

The Stage 1 Road Safety Audit agreed with this and recommended that the alignment of the road be amended. The designer agreed and provided an amended access drawing. This realignment has NOT been incorporated into the submitted planning application.

No amendment to the previously proposed junction or indeed any mention of Highways issues. In fact, Bellway Homes seem to have gone against a recommendation in their own traffic survey.

2. **NW corner of the site** - We note that there is a proposed “vehicular connectivity route through to adjoining land parcel” from the allotments. The ANP specified there to be a “sustainable transport link” only in this area. The access to this development should be from Church Close, with no secondary access via Rectory Lane. See 3.a. above.

No removal from the plans or indeed any comment as to the reason for its inclusion at all? There should be no access from Rectory Lane as this would cause significant traffic issues in the village with potentially 5 developments all using the same minor road.

### Other points –

1. **Parking** - the submitted Layout Plan (062009-BEL-SL-02) shows 18 parking spaces are to be provided for the 14 allotments, a separate 20 spaces to serve the MUGA, and no spaces to serve the grass football pitch. The distribution of parking spaces is unbalanced and impractical. It would be better to have one car park to serve all needs.

No amendment to parking spaces proposed.

2. **Forest Schools** (ASH11xi) - how are the access routes from school to Forest Schools land to be maintained, how is the land to be secured for Forest Schools use in the long term?

No response received.

3. **MUGA** - how will the lighting be designed and managed to ensure no harm to bats and other wildlife?

No response received.

4. **Sports pavilion** - this is poorly located to serve the proposed grass football pitch. In addition, it is poorly sited to allow any decent views of the MUGA - the proposed viewing windows and “Outdoor Viewing Area” primarily overlook the proposed attenuation basin and allotments. There is no outdoor storage space provided for football goals/equipment including mowers, there is no access to toilets from the outside of the building so muddy boots from players using the grass pitch will, most likely, be trailed through the building. The kitchen would benefit from an outdoor serving hatch so that drinks can be served to spectators outside.

Pavilion has not been relocated in response to concerns raised.

Some items raised by Sport England have been addressed, but not all. ie access to toilets through main access point (muddy boots etc). Additional items amended in response to Sport England concerns (separate shower cubicles etc) have been provided at the expense of the Club/Committee room. More amenities have been squeezed into a smaller space.

Storage building potentially obstructs view of pitch from pavilion.

Minimal effort to ensure this building is fit for purpose.





5. **The Design & Access Statement p63 Furniture Strategy** makes no provision for seating at either the MUGA or grass football pitch.  
**None added in revised plans.**
6. **Attenuation basin and expansion area** - this is proposed right next to the sports pavilion, football pitch (MUGA) and children's play area in the NW of the site. This will store rainwater in the event of heavy rainfall. Putting an attenuation basin right next to an area where children will congregate & play is downright dangerous. The location of this also interferes with the ability to co-locate both sports pitches in the NW of the site.  
**No amendment or rationale.**
7. **Ecology report** (para 7.2, EE1-EE8) - what measures will be put in place to ensure the Biodiversity Net Gains are maintained in perpetuity?  
**No response received.**
8. **Sustainable transport links** - the provision of routes to and from the development are welcomed. WSCC has recommended that FP2607 is upgraded to Bridleway status as part of the Chanctonbury Nurseries planning application (DC/22/0372), and we would expect all sustainable transport routes to also be of Bridleway designation and standard. Including FP2611 (ASH11x).  
**Would need clarification if the proposed new link to FP2607 would be to this standard?**
9. **Bus services** - The Transport Statement, para 1.6 states "with bus services to be improved" but makes no mention as to how local bus services will be improved.  
**No response received.**
10. **Water Neutrality Statement** - this should be checked and challenged.  
Section 2.0 Existing Site Water Use -  
"Existing Farm Water Use" - With regards to the site as an existing area of farmland, this section quotes figures obtained from the Center for Ecology and Hydrology and Met Office for the last year, indicating "between February 2021 and January 2022 this area received 1,133 mm of rainfall; representing 91% of typical rainfall for the south west of England according to office records". We would like to point out that Ashington is in the Southern region, not the South West region of England and therefore consider the figures should be 716mm of rainfall representing 88% of typical rainfall.  
  
"Existing Car Valeting Water Use" - No local evidence exists to support the applicant's claims of washing 30 cars per day. Car washing is not, as we understand, an authorised activity at this site, and therefore we cannot see how these figures could be used to "offset" water usage at the proposed development.

There is discrepancy in the document as to how much water is actually being “used” by the car washing business, with 2 different estimates and incorrect calculations –

Page 8 - 60 litres per car x 30 cars per day = 1,800 litres per day = 657,000 litres year.

Page 21 - 60 litres per car x 25 cars per day = 1,500 litres per day = 375,00 litres per year (incorrect calculation, should say 547,500 litres)

We can see no recent update regarding water useage or corroboration of information previously provided. All this information provided by Bellway Homes is not only mathematically incorrect it is also factually incorrect. The car wash facility is a fabrication of someone’s overactive imagination; it does not nor has ever existed.

11. **House and garden designs** - concern about the lack of front gardens leading to an oppressive street scene. Rear gardens backing onto and overlooking each other, creating irregular and impractical garden shapes eg plots 10-16 and 123-132. No gardens for the flats and some other properties e.g. 144 and 147, 33 and 36.

No visible change on plans (even though “nine additional 2 bedroom homes and nine fewer 4+ bedroom homes are now proposed”).

12. **Consultation** - Bellway Homes may well have sought the parish council’s feedback on preliminary plans, but they certainly have not taken any action on the feedback given. Their engagement with the parish council has been nothing more than a “tick box” exercise in order to demonstrate “consultation”.

We would consider there are many issues raised by the parish council that have still not been addressed or responded to. This shows a total lack of Bellway Homes even trying to engage with the local community or trying to find any solutions to issues raised. They seem to have a total disregard for the ANP process and for the planning issues raised by both the parish council and Horsham District Council. It appears to be their way or no way. By ignoring or side-lining issues, they seem to assume they will go away.

Ashington Parish Council have reviewed all revised plans and updated information with regards to planning application DC/23/0406 and in its current form -

**Ashington Parish Council OBJECT to the application.**