

18 August 2023



Nicola Pettifer
Horsham District Council
Planning Department
Chart Way
Horsham
RH12 1RL

Robert Steele
E: RSteele@savills.com
DL: +44 (0) 1483 796 807

244-246 High Street
Guilford GU1 3JF
T: +44 (0) 1483 796 800
savills.com

Dear Nicola,

LAND WEST OF ASHINGTON C OF E PRIMARY SCHOOL, ASHINGTON

HDC REFERENCE: DC/23/0406

DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF 180 DWELLINGS, SPORTS PAVILION, SPORT PITCHES AND ALLOTMENTS; WITH ASSOCIATED ACCESS, LANDSCAPING, OPEN SPACE AND INFRASTRUCTURE.

I am write in respect of the above planning application which was submitted on behalf of Bellway Homes (South London) Limited, to Horsham District Council (HDC) on 3 March 2023.

This letter has been prepared in response to consultation responses which have been received to date and provides additional information and amended plans.

The topics included in this letter are:

- Proposed Development and Heritage
- Footpath Links
- Housing Mix
- Sports Pitches and Pavilion
- Safeguarded Education Land
- Commercial Floorspace
- Mill Lane Flooding
- Noise
- Air Quality

Enclosed with this letter are:

- New and updated site section drawings
- CGI views of the proposed development
- Coloured layout drawing of proposed access way by Allen Pyke
- Amended site layout by DHA
- Technical Note on Mill Lane by Ardent
- Historic Environment Response by Pegasus

Proposed Development and Heritage

Revised site sections are enclosed with the letter to correct the originally submitted versions. 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. Drawing No. BEL-SL-SS01- A is also provided with this submission.

To assist in the LPA's assessment of the impact on the setting of the nearby Scheduled Monument to the south of the site a CGI view has been provided with this letter. This illustrates the separation distance between the proposed built form and the edge of the site near the Scheduled Monument. As explained further below, the southern grass pitch has also been removed from the proposed development. The submitted information demonstrates that the harm arising to the Scheduled Monument, via a change to its setting' would be less than substantial, at the low end of the spectrum. Further information is provided in the Historic Environment Response by Pegasus.

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.

The Historic Environment Response by Pegasus assesses the proposed development as having a less than substantial harmful impact, at the lower end of the spectrum, on the setting of the Church

In accordance with the NPPF any harm arising to heritage assists needs to be considered in the context of public benefits of the proposed development. These are set out in the Planning Statement, and given the less than substantial harm identified, the applicant's view is that the public benefits in this case outweigh any harm, and so complies with the relevant obligations and policy requirements.

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. This is likely to benefit existing and future residents access to the site.

As you know we met with West Sussex Public Right of Way team and have resolved their concerns. We are awaiting undated comments from them to confirm this position.

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. See Table below.

Bedroom Numbers	Number of Market Homes originally proposed	Revised Number of Market Homes	Difference from originally submitted	% of market units	SHMA Requirement %
1 bed apartment		-		0%	5%
2 bed apartment	4	4		23%	30%
2 bed houses	14	23	+9		
3 bed houses	52	52		44%	40%
4+ bed houses	47	38	-9	32%	25%
Total	117	117			

The proposed housing mix is broadly in accordance with the SHMA. The minor deviations from the SHMA respond to market analysis of the local area ensuring the development provides much needed family housing that reflects the character of the surrounding area, given the site's semi-rural location and proximity to the primary school.

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.

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.

However, 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;
- 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
- 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 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.

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.

Safeguarded Education Land

Policy ASH11 of the Neighbourhood Plan requires 0.45ha of land to be safeguarded for future school expansion. The area highlighted in the allocation map in the Neighbourhood Plan for this purpose is not included in the application site. However, the land will be safeguarded and the proposed development would not prejudice the land being used for the school expansion in the future.

West Sussex County Council (WSCC) Education consultation response to the application states that a total of 0.54ha of land is required to be safeguarded. This is an uplift from the amount specified in the Neighbourhood Plan, and their justification for this is based on the 180 homes proposed (i.e. the 30 new homes proposed above the approximate figure stated in Policy ASH11).

The applicant does not consider WSCC position on this to be reasonable or justified. The proposed quantum of new homes is in compliance with the “approximate” number of homes cited in Policy ASH11. There is also no provision within the policy that says the amount of land safeguarded should be adjusted depending on how many homes are proposed.

In addition, WCSS has provided no evidence to show that the additional request for safeguarded land is proportionate or justified mitigation for the proposed development.

The 180 new homes would generate an uplift in the CIL liability compared to 150 homes, which could be used in part to help fund the school expansion, which seems to be a more appropriate way of mitigation in lieu of additional safeguarded land above the 0.45ha requirement.

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;

It is noted that the policy requirement requires either commercial floorspace on site or off site as part of a multi use 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.

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.

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.

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 Lane 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.

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.

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.

Conclusion

The submitted information and plans show that the applicant is willing to respond positively to consultation and advice from HDC. Once you have had the opportunity to review the information we would welcome a meeting with you to discuss and consider next steps.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "R. Steele". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Robert Steele MRTPI