



# Ashington Parish Council

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17th April 2023

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

Dear Sir/Madam,

The following planning application was discussed at the Ashington Parish Council Extraordinary Planning Committee meeting on Friday 14th April 2023 –

### **Planning application - 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.

Land To The West of Ashington C of E School Park Lane Ashington West  
Sussex

### **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.

Ashington Parish Council worked extremely hard, with the landowners and their agents, to create a comprehensive ANP Masterplan (Figure 1) for this new development and it is this basis on which the ANP was voted on at referendum by Ashington residents and subsequently adopted as Planning Policy for the parish. It is hugely disappointing that this application deviates so significantly from what was agreed and voted on. It makes a mockery of Neighbourhood Plans if years of working together can simply be thrown out once sites have received an allocation for development.

### **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.
2. **Quantum of development** - the parish council does not support delivery of 180 homes. As part of the ANP evidence base, the parish council commissioned a Housing Needs Assessment, which recommended 123-200 homes would be appropriate for Ashington  
(<https://www.ashingtonpc.org.uk/pdf/evidence-base-housing-needs->

[assessment-58-pdf.pdf](#)). The parish council agreed the upper figure in the range, because of an historic under delivery in Ashington, and then added 15-20% additional homes to allow for any uplift in government targets during the time it took to produce the ANP. This means that the ANP is already at the upper level for appropriate housing numbers. In addition, given that HDC has no current Local Plan and therefore no agreed housing targets except the historic HDPF then it could be argued that Ashington did not need to add the 15-20% uplift at all and certainly there is no justification for a further 20% uplift from the applicant at this site. The ANP site allocation for 150 homes should be adhered to. Provision of an additional 30 homes also interferes with the ability to co-locate both sports pitches and pavilion in the NW corner of the site.

3. **Housing density** - Para 5.4v of the submitted Planning Statement states that the “built form covers a reduced area than the (ASH11) policy”. This means that 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. As this is an edge of settlement expansion of Ashington, the ANP envisaged a lower density of homes to allow for a softened landscape.
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. These areas formed part of the landowners site submissions during preparation of the ANP. At no point did the landowners indicate that these areas were no longer available for inclusion in the ANP. They form an important part of the ANP Masterplan creating additional open space and sustainable transport routes.
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”.
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.
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.

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.
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”. As part of the ANP evidence base gathering WSCC commissioned a Flood Report on the problematic Mill Lane culvert in Ashington and suggested mitigation measures.

([https://www.dropbox.com/s/33jtrpmeg6o59ov/Ashington\\_EF1057%2005DRA%20FSR%20160422.pdf?dl=0](https://www.dropbox.com/s/33jtrpmeg6o59ov/Ashington_EF1057%2005DRA%20FSR%20160422.pdf?dl=0))

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).

10. **Sports facilities** - the provision of two full-size football pitches (one grass and one MUGA), sports pavilion & parking is welcomed but separating the two pitches across the development makes no practical sense - 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 submitted Heritage Statement (P21-3540) para 1.21 shows that Historic England raises concerns regarding landscaping, drainage works and ground preparation for sports pitches. Para 6.36 confirms that “limited works to the southern pitch would be undertaken”. Without good ground preparation and drainage, it is unlikely that this pitch will be in any usable condition for most, if not all, of the year. 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.

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.).

### **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-pdffile.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. There is a real concern locally that there will be accidents unless the distance between the junctions is increased. A very small piece of parish council land would be needed to accommodate the safer road layout and the parish council has previously made it clear to the applicant that it is open to discussions on this matter.

It should be noted that the existing junction of Church Lane and Foster Lane already causes significant issues with the junction being of insufficient size to adequately allow a car from Foster Lane to turn into Church Lane without crossing into the other carriageway. The developers were informed of existing issues with this junction at their public consultation in December 2022, but their response was that a “desk top survey” had indicated otherwise.

Church Lane is a road with inadequate walkways, and parked cars making access difficult. A parking bay outside the Church makes visibility difficult from the proposed access route, and parking issues at the junction already exist. A well-attended Church, a school with 210 pupils and the main village halls/community centre make this road busy at peak times. Any additional traffic, above the levels expected in the ANP, will clearly compound existing problems and even more so if the safer staggered junction is not agreed to.

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.

#### **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.

The submitted Transport Assessment para 4.18 states that “it is envisaged that the southern (grass) pitch will be used by the community informally and any organised events will occur at the sports pavilion. As such, visitors to the southern pitch are likely to travel by sustainable modes of transport from the local area rather than via private car”. The parish council is unsure as to where the applicant gets the evidence for this statement from? The ANP Policy ASH11xiii states a full sized (11 a side) grass football pitch for community use is to be provided. Ashington Cougars and Ashington Rovers are local community groups that need football pitches to play matches on.

Opponents will travel from across Sussex; therefore, parking spaces are needed at the grass pitch.

The Transport Assessment para 4.19 makes the assumption that peak demand at the football pitches will be weekday evenings and Saturday daytime. The author is clearly unaware that Women's & Girl's football (a very fast-growing sport) takes place on Sundays.

The Transport Assessment para 4.21 states that the majority of visitors will be travelling from Ashington. The reality of football matches is that at least half of the visitors will not be from Ashington (i.e. the opposition team).

Para 4.22 concludes that conflict for parking spaces between the allotment and football pitch users is "unlikely to occur". This assumption is questionable as allotment users will more than likely visit at the weekends. It is likely that visitors to nearby properties may also use these spaces. The validity of all of these assumptions must be challenged.

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?
3. **MUGA** - how will the lighting be designed and managed to ensure no harm to bats and other wildlife?
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.
5. **The Design & Access Statement p63 Furniture Strategy** makes no provision for seating at either the MUGA or grass football pitch.
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.
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?
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).

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.

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)

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.
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”.

#### **Inconsistencies between documents –**

1. Para 3.19 and 5.4xv of the submitted Planning Statement states 10 parking spaces for pavilion & allotments, layout drawing shows more.
2. Para 5.4xvi of the submitted Planning Statement states that parking for the allotments is at the adjacent Sports Pavilion, layout drawing shows

differently.

3. Para 5.4xiv of the submitted Planning Statement states “proposals include an 11-a-side grass MUGA”. MUGAS are not grass – they are all weather surfaces. The submitted Design & Access Statement refers to an “all weather MUGA”. Other documents state the MUGA will be to “Sport England specification” but do not give any details of the exact specification. What exactly is to be provided?
4. The submitted application form notes no employees currently on the site, but the water neutrality statement states that there is a current car washing business on site. The quoted amount of cars washed each day varies between 25 and 30 cars in the same document giving a variance of

**ANP documents can be viewed here:**

**<https://www.ashingtonpc.org.uk/key-documents/>**

### Figure 1 ANP Masterplans March & October 2020



**Figure 2 Extract from ANP - Black hatched areas are EXCLUDED from planning application DC/23/0406**

