

Warnham Neighbourhood Development Plan Regulation 16 Consultation - Summary of Representations

Reference	Policy No. Paragraph	Summary
Ref #1	Support General	<p>Supports the plan because it is necessary for Warnham to accept additional housing, with 35% affordable housing and housing for aging population. Heritage assets need to be protected. <i>'Any new development should enhance (not detract from) Warnham's appeal as an attractive village'</i> with adequate parking, facilities for residents and visitors. <i>'It is important that new housing should NOT be "luxury" or "executive". It must be for LOCAL needs. New development must respect landscape features and views; be designed to a high standard and generally not exceed two stories in height'.</i></p> <p><i>'Additional housing in Warnham will mean more traffic entering and leaving (or rat-running through!) the village onto the A24 via Bell Road or Knob Hill. These junctions are already hazardous. It is surely time for Warnham Parish Council and Horsham District Council to raise this issue with the responsible highways authority (West Sussex County Council) to see if there is any way to make these junctions safer for Warnham residents and visitors'.</i></p>
Ref #2 Thakeham Home Ltd.	Support with modifications	<p>The representation is in relation to Land to the East of Dorking Road, Kingsfold, first promoted to WNPSG in October 2015. The respondent supports the progression of the plan, however it is disappointed that the submission plan relies solely on one site for housing supply and is concerned that this does not show any resilience in <i>'ensuring housing delivery'</i>.</p> <p>The WNDP must meet the Basic Conditions as stipulated in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and be in general conformity with the Horsham District Planning Framework (HDPF), especially Policy 15: Housing Provision. With the forthcoming review of the HDPF and expected increase in the number of houses needed in the district <i>'thus requiring NP's to deliver a greater quantum across the future plan period'</i>. The argument is made that the plan needs more than one site to show that it has been positively planned by ensuring against a shortfall in numbers should the Freeman Road site fail to deliver due to constraints or unexpected external factors. This would help guard the plan against windfall application in a less favourable location. Additional site/s such as this would ensure the plan is also positively planned in accordance with national policy.</p>

Reference	Policy No. Paragraph	Summary
		<p><i>'In light of this, we would request that the WNP allocates additional sites including Land to the east of Dorking Road, Kingsfold. This would ensure against a shortfall in housing numbers for Kingsfold and the District as a whole, in the event that the site at Freeman Road fails to come forward, or is constrained in its delivery by unexpected external factors. It would also help to guard against a 'windfall' application in a less favoured location within the Parish. Allocation of an additional site(s) would also ensure that the Neighbourhood Plan is positively prepared in accordance with National policy'.</i></p> <p>The WNDP site assessment report, which called the site 'Land north of Pryors Wood, Kingsfold' (Ref: WN17)' and considered the site to be unsustainable and concluded that access was an issue. With regards to the access, the plan stated that if the issue could be resolved, then the site could come forward for 6 dwellings. The respondent notes that they sought advice from the Local Highways Authority (LHA) West Sussex County Council (WSCC). Advice received on 9 June 2016 stated that:</p> <p><i>'a new access point is proposed off Dorking Road. Dorking Road is an 'A' class road with a posted speed limit of 40mph in this location. The access will take the form of a simple priority junction with a 5m wide minor arm extending into the site. This is acceptable to the LHA'.</i></p> <p><i>As such, we ask the WNPG to consider allocating our site at Dorking Road, Kingsfold, now that it can be demonstrated that the LHA are satisfied with the proposed access arrangements and do not consider it to be a constraint to development".</i></p> <p>A planning application for the erection of 14 units (DC/18/1700) was submitted to HDC for consideration and is supported 'by a number of technical surveys and assessments demonstrating the site's availability and suitability for residential development'. The respondent argues that this shows the site is deliverable. It is also argued that the site 'is well related to the existing pattern of development'.</p> <p>When considering availability the respondent quotes National Planning Practise Guidance (NPPG) Paragraph 021 (Ref. 3-020-20140306) on when a site is best considered to be available. The respondent notes that the site is controlled entirely by them and they are actively engaging with WNDP and HDC.</p>

Reference	Policy No. Paragraph	Summary
		<p>With regard to suitability the respondent quotes NPPG Paragraph 019 Ref. 019-20140306. In the plan's initial assessment of the site it was considered that access was a constraint, the pre-application correspondence with the LHA demonstrates that access from the site is feasible.</p> <p>On achievability the respondent quotes NPPG, Paragraph 021 Ref. 021-20140306. Before stating that <i>"Thakeham has a proven track record for delivering schemes of a similar size and scale throughout the South East and has the capacity to deliver the development of the site to provide much needed new homes within the first 5 years of the plan period"</i>.</p> <p>Deliverability: <i>'For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. As such, we consider that the site could provide much needed housing development within the plan period'</i>.</p> <p>The respondent then concludes that the plan should allocate additional site/s to ensure that it meets the definition of sustainable development whilst being in accordance with national policy, seeing it be planned positively and flexible to change. Repeating that the site at Kingsfold is available, suitable and achievable, arguing that this shows it is in accordance with deliverability in the NPPG.</p>
Ref #3	Oppose Policy W5 (5.1 – 5.21)	<p>Strongly opposes the allocation on Freeman Road for a number of reasons.</p> <p>Firstly, the access to the site and increased congestion. The level of traffic throughout the village is already concerning. Access has poor sight lines, whilst the whole site is bordered by public footpaths which is used frequently by local residents. The roads do not have capacity for the construction vehicles and the new residents' cars. Those attempting to avoiding the main road/s will be further congested along Mayes Lane and Knob Hill. <i>"These are narrow country lanes with sharp blind corners, and as a local resident on Knob Hill we regularly have cars crashed in to our wall, gate or driveway because of careless driving and excessive speeding and have even had one car turn upside down outside of our house"</i>. Secondly, the amount of rural spaces will decrease and are under threat from further development, if this site is allocated. Thirdly, the site will be too crammed with houses, whilst there'll be sufficient parking for the houses, <i>'with limited space only adding further pressure to the surrounding streets and residents'</i>.</p>

Reference	Policy No. Paragraph	Summary
		The respondent suggests that the plan re-consider allocation of housing to the 'Bell Road site', giving easy access to the A24 easing congestion and construction traffic. The site is also walking distance to the local school, church, shops and pub for new residents.
Ref #4	Oppose 5.13	<i>'Traffic through village and tillets lane will be unacceptable if not dangerous'.</i> Suggested modification: <i>'Land to the South of Bell Road will not unduly affect traffic'.</i>
Ref #5	Oppose Policy W5 5.1 to 5.21	<i>'The site proposed has an entrance off a single track lane. This lane, Tillets Lane, and the road up from the village, Threestile Road, is heavily used by pedestrians, walking their dogs and with pushchairs with children. It is a popular cycling and horse riding route. Threestile Road is already used as a "rat run" and can be very dangerous with the speed of the cars entering and exiting the village. This will only be exacerbated by increased traffic created by a housing development of this size. The construction traffic movements will create an additional hazard'.</i> Suggested modification: <i>'There is a much better located site on the south side of Bell Road which would be much more suitable and solve the access issues'.</i>
Ref #6	Oppose Policy No. W6	<i>'This was not the first choice of the residents of Warnham, it was Bell Road, which has far easier access for vehicles and would cause less disruption in the village, with regards to vehicles building the houses and the new residents. The village has quite small roads so will cause congestion and possible accidents. Bell Road is also close to the village shops, school and church. It's also closer to a main road for commuting with no limitations on access. Building north of Freeman Road you would be building on recently used agriculture land whereas Bell Road hasn't been used for agricultural purposes for as long as I can remember. Basically the view of the villagers is that the development would be most appropriate and ideally situated in Bell Road, but the view of one land owner seems override the vote of long term village residents who actually live in the village.</i> <i>Build the houses where the people who actually live in the village want them. This decision will effect the entire village life, destroy agricultural land and be done at the detriment to our beautiful village. Having lived in the village all my life it'll be a shame to destroy such a lovely piece of land and make our village busier as people will have to drive through the village instead of straight onto a main road'.</i>
Ref #7	Oppose Policy W6	Bell Road would be a more suitable allocation for the plan and has better access for construction and the new residents. The village roads are tight and there'll be lots of congestion on Freeman Road. Bell Road is in closes proximity to local amenities

Reference	Policy No. Paragraph	Summary
		<p>such as schools, shops and the church. There is agricultural use close to Freeman road and little has been put on Bell Road. This seems to be the most logical reason for access whilst being closer to the train station.</p> <p><i>'All the villagers were in favour of Bell Road, I've been in the village over 80 years and I can honestly say that north of Freeman road is the worst location for access and use. It is a beautiful part of the village that'll be destroyed which is close to other residents. Bell road isnt close to them and it's been approved by the people who actually live in the village'.</i></p>
Ref #8	Oppose	<p>The respondent argues the proposed freeman site will add to the congestion in the village. It is argued that the Bell Road site would add the least amount of congestion, noting adjacent Public Rights of Way to the Village high street.</p> <p><i>'I understand that this was the original preferred site but the land owner himself wanted to develop this land so it was changed to the current proposed site. The development site should be chosen on suitability not availability, as this is clearly the optimum site for any new development due to the proximity to the A24. The average family has two vehicles and the increase in traffic as they travel to work would create traffic chaos'.</i></p>
Ref #9	Oppose	<p>The respondent argues that by allocating '60 houses' at land North of Freeman Road the village will likely become congested by the level of traffic that shall increase from 'approximately 120 additional vehicles' that shall be on the road. With this in mind, the respondent argues that the best site would be South of Bell Road. Due its proximity to the A24, community facilities and amenities. Allocating housing on Land North of Freeman would result in the loss of privacy, thus contradicting Policy W5 Criteria (g) which states: <i>"They do not result in unacceptable loss of amenity for neighbouring uses through the loss of privacy, loss of light or visual intrusion"</i>.</p>
Ref #10 Southern Water	Oppose Policy W1	<p>The respondent understands the desire to protect the open countryside, however, it <i>'cannot support the current wording of policy W1 as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development. The policy refers proposals outside the built-up area boundary to policies 3, 4 and 27 of the Horsham District Planning Framework (2015), however none of these policies contain provisions to make allowance for essential utility infrastructure'.</i></p> <p>The respondent continues that the utilities provision which was in the Regulation 14 version of the plan was removed from the Regulation 16 version. <i>'We do not agree with the statement on page 5 of Appendix 4 to the Consultation Statement, that</i></p>

Reference	Policy No. Paragraph	Summary
		<p><i>utilities infrastructure is covered by permitted development rights - this is not applicable in all cases and planning applications may, during the lifetime of the WNP, be required for new or upgraded structures related to the provision of water or wastewater infrastructure needed to serve new and existing development, or conform to stricter environmental standards'.</i></p> <p>Adding to this the respondent argues that:</p> <p><i>'Furthermore, Paragraph 116 of the National Planning Policy Framework (NPPF) (2012) establishes that development should be permitted in designated areas in exceptional circumstances, where it can be demonstrated that the proposal is in the public interest. This approach is further supported by paragraph 118, which describes the principles that development should be permitted if the benefit outweighs any harm. It is important to consider that there may be limited options available for the location of new utilities infrastructure (e.g. a new pumping station) due to the need to connect into the existing network. The National Planning Practice Guidance (ref: 34-005-20140306) recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered' '.</i></p> <p>The respondent then concludes that as a result of the above, Warnham Neighbourhood Plan does not meet the basic conditions.</p> <p>Suggested modification: <i>'Our proposed amendment would accordingly be in line with the NPPF and NPPG and so enable the basic conditions of a Neighbourhood Plan to be met (new text is underlined):</i></p> <p><i>[...]</i></p> <p><i>a) Development proposals outside the Built-Up Area Boundary will not be permitted unless they conform to the policies of the Horsham District Planning Framework <u>or they are for essential utility infrastructure, where the benefit outweighs any harm, and it can be demonstrated there are no reasonable alternative sites available;</u>'</i></p>
Ref #11	Oppose Policy W6	<p><i>'The first choice of Warnham residents was a site situated at Bell Road, which has much easier access for vehicles and would cause less disruption to the village. The site they are proposing would mean driving through the village through narrow roads some single file with only passing places. Bell Road is close to the village shop, church, and school it also has no impact on residents as there are only houses on the north side so it won't be looking into people's houses and</i></p>

Reference	Policy No. Paragraph	Summary
		<p><i>gardens from an elevated position as it would be from Freeman Road. The land at Bell Road hasn't been used for agricultural or any other uses for as long as I can remember and it seems strange to me that this whole section of land doesn't appear to be in the neighbourhood planning area and therefore the local land owner can put houses there adding even more houses to the village. I find it very disappointing that one land owner can dictate what would be best for him compared to what would be best for the Village'.</i></p> <p>The respondent suggests modifying the plan to allocating the housing on Bell Road instead of Freeman Road as the infrastructure is already there and will have <i>'the lowest impact on village life'</i>.</p>
Ref #12	Oppose	<p><i>'As a resident of Warnham I wish to register my objection to the current plan to develop the North of Freeman Road Warnham as the traffic trying to access the main Roads would be a hazard as most of the roads in the village are single file due parked cars. I feel the ideal place for new housing development would be Station Road Warnham as that would give easy access to the A24 and minimise traffic trying to go through the village'.</i></p>
Ref #13	Oppose	<p><i>'Tilletts lane is unsuitable for the degree of traffic that will be generated by this development. It is bad enough that Warnham is used as a rat run each morning and evening, the 20 mile an hour limit is a joke, the school traffic is bad enough without more that will be generated by this development as most people will drive their children to school despite living a short distance away'.</i></p> <p>Suggested modification: <i>'the road should come out in Threestile Road if the development has to go ahead, much wider road access there'.</i></p>
Ref #14	Have comments 3.1	<p><i>'The development is in an area that has single track access roads to it. The traffic levels that currently go through the village cause problems, so the idea that an additional 50 new houses will not generate large amounts of additional traffic are very unlikely'.</i> Suggest modification: <i>'The site needs to be as the village voted for - South of Bell Road.</i></p>
Ref #15	Oppose 3.1 and 3.2	<p>The access from the proposed Freeman Road is insufficient as it proposes to come off a single track lane. This will add to the village's congestion. The community prefers the Bell Road site as is unlikely to impact the village, it would also see potential for a 'pedestrian/cycle underpass' to the station. Adding that the Bell Road site should be Compulsory Purchase Order if the landowner refuses to put their site forward.</p>

Reference	Policy No. Paragraph	Summary
		Suggested modification states <i>'put the new site on the south side of Bell Road and get any developer to provide an underpass to Station Road. The developer should also be required to provide traffic calming measures in the village'</i> .
Ref #16	Oppose Warnham Neighbourhood Development Plan	Has lived in Warnham Village for a long time and argues that the <i>'beauty and appeal of Warnham is the village country feel which will be lost if this is allowed to go ahead'</i> . The respondent appreciates the need for housing in this country but asks if it needs to be at the cost of the British Countryside, whilst arguing that there is surface water flooding and heaving traffic in the area. Regarding traffic, it is seen as already being a serious issue, and will further increase during the school run. Suggest modification: <i>'Move the site elsewhere perhaps between Warnham and Broadbridge heath'</i> .
Ref #17 Kingsfold Residents Association	Support	<i>'The Kingsfold Residents Association support the Warnham Neighbourhood Plan. Our support is based on:</i> <i>a) The proposed site of 50 dwellings (including 15 units of affordable housing), north of Freeman Road in Warnham, will be in proportion to the scale and size of the village in accordance with Policy 3: Settlement Hierarchy</i> <i>b) It is in line with the Horsham Local Plan requirement that development under a neighbourhood plan is within or adjacent to the boundary of villages with the facilities to render them sustainable.</i> <i>c) Sites in Kingsfold were submitted for consideration but cannot be taken forward, on the basis that The Horsham Local Plan and national policies require developments to be sustainable. The requirement for sustainability includes being within walking distance of shops and other facilities including a local primary school. Kingsfold fails to meet this criterion'.</i>
Ref #18	Oppose Section 5.1 - 5.8 North of Freeman Road. Ref. WNDP1	Opposes the allocation of housing on North of Freeman Road. Traffic has become an increasing problem over the years and single roads has led to cars parking and causing congestion, this <i>'will inevitably become an even bigger problem in the future given the vast number of houses being built in the Horsham and district area'</i> . Building on the site <i>'will only exacerbate the situation and is a poor choice'</i> . Tillets Lane, Friday Street and Threestile Road are narrow, the respondent argues that <i>'the logical aim should be to choose a site that avoids the village'</i> . The respondent also argues that <i>'the proposed site, as it exists, benefits Warnham by providing a green space which adds to the country village atmosphere, one of the charms of Warnham worth preserving for the future'</i> . Suggested modification: <i>'Revert to the villagers preferred site for development on the south side of Bell Road'</i> .

Reference	Policy No. Paragraph	Summary
Ref #19 Highways England	Support	<p><i>‘Having reviewed the Warnham Neighbourhood Plan Regulation 16 Consultation, we note that the Horsham District Planning Framework identifies that between 2015-2031 at least 1,500 homes should be delivered throughout the district allocated through Neighbourhood Planning. The Warnham Neighbourhood Plan has identified provision for 50 dwellings at Land North of Freeman Road’.</i></p> <p><i>Accordingly, Highways England does not offer any comments at present on the Warnham Neighbourhood Plan Regulation 16 Consultation. However, if further sites are identified, Highways England requests that it is kept informed for consideration of whether there would be a cumulative impact on the Strategic Road Network’.</i></p>
Ref #20 DBA Estates	Support with modifications. Have comments 1.11; 2.17; Objective 7; Vision; Chapter 6; 6.8; 6.10; and 6.11. Policy W7	<p>Representation is made on behalf of Wienerberger Ltd for its land holdings at Station Road, Warnham. The respondent welcomes paragraph 1.1 which recognises the need for a partial or full review under the guise of the revised NPPF and the Horsham District Planning framework (HDPF) review. The respondent supports with modifications as</p> <p><i>‘At Paragraph 2.17 we note the comment regarding pockets of commercial activity but feel that the paragraph lacks completion over concerns raised following the community survey. What were the concerns and how have they been addressed through the production of the Neighbourhood Plan? Without further clarification to this paragraph we are unable to comment further to its Appropriateness’.</i></p> <p>Whilst noting that the district has a ‘diverse urban and rural economy’, the respondent identifies Neighbourhood plans ‘play a central role in identifying and promoting sustainable economic growth at the local level, however it is recognised that the Warnham Neighbourhood Plan does not specifically allocate commercial development’. The respondent then quotes Policy 10 in the HDPF, stating that the Plan’s Objective 7 (encourage appropriate businesses) ties in with the objectives of the HDPF and the NPPF 2012, of which the respondent supports and encourages.</p> <p>Whilst the respondent argues that there is a contradiction with the plan’s employment policy, due to there being no employment allocations in the plan. Stating that:</p> <p><i>‘The Vision contained within the Neighbourhood Plan for Parish businesses to have expanded and strengthened, providing increased local employment opportunities with additional business premises having been successfully integrated into the parish environment further demonstrates the Warnham Parish’s commitment to securing</i></p>

Reference	Policy No. Paragraph	Summary
		<p><i>sustainable economic growth for the Parish and indeed the wider District so it remains unclear why there are no employment allocations put forward within the Neighbourhood Plan’.</i></p> <p>The respondent describes the Chapter 6’s survey taken of Parish based businesses. After going the survey’s findings, which found businesses frustration with broadband speed and mobiles signals, the respondent argues that they <i>‘agree with the aim of the Neighbourhood Plan to ensure that all new residential, commercial and community properties within the parish should be served by (or ready for) a superfast broadband (fibre-optic) connection, unless it can be demonstrated through consultation with British Telecom that this would not be either possible, practical or economically viable. Ensuring a good secure and quick internet access is vital to the start up of many businesses and would be paramount in ensuring contribution to their survival rates over the first 12 months of operation’.</i></p> <p>The respondent also agrees with paragraph 6.8 statement that businesses based in Warnham should be protected, enable local access to work before adding that this should be sustainable and noting the site’s close proximity to Warnham train station.</p> <p><i>‘As set out above, it was noted that no specific employment allocations are made within the Warnham Neighbourhood Plan. This is confirmed by Paragraph 6.10 which considered that specific land allocations were inappropriate within the site shortlisted for development. Wienerberger disagree with this statement and can confirm that they have promoted the site through the Neighbourhood Development Plan and Horsham District Local Plan Review. Indeed, Paragraph 6.11 confirms that the site has been identified for potential employment use (Site SA 842) in the SHELAA. The site was originally deemed not currently available for a number of reasons including access, liability to flooding and remoteness from a Built-Up Area Boundary. DBA Estates submitted representations to Horsham District’s Consultation on the Local Plan Review Issues and Options Consultation in April 2018 to promote the site for commercial development’.</i></p> <p>The respondent further argues that the site is sustainable by noting it’s proximity to the A24 and good road links to M25 and A264. Whilst adding that the train station provides good services to Horsham, Dorking, Leatherhead, Epsom, Sutton and London, promoting non-car journeys. Before making the following arguments:</p> <p><i>‘Extensive background studies and technical reports have been carried out on the site which demonstrate that the site is suitable for commercial development. These have included ecological surveys, topographical survey, and transport</i></p>

Reference	Policy No. Paragraph	Summary
		<p><i>assessment including traffic surveys. Detailed proposals were put forward with the representations to the Local Plan Review, including access junction proposals which proposes access from Station Road via an all movements simple priority junction. The design proposals provide both a betterment to the existing junction arrangement with the A24 and a junction capable of accommodating the traffic associated with commercial B1 office development on the site. We therefore consider that the site should be considered for future employment allocation within the Neighbourhood Plan. It is clearly a site that has been given consideration through the Neighbourhood Plan process which is coming forward prior to the Local Plan Review’.</i></p> <p><i>‘The proposals at Station Road aim to meet the demand for much sought after commercial floorspace for local and wider business requirements. It is vital that the Council and Parish support opportunities to meet the shortfall in B1 office space required for SME start-ups. Existing employment stock in the District is old and of low to moderate quality, thereby does not appeal to companies looking to invest in the South East region. This site offers the opportunity to bring forward high quality Grade A office development to meet the latent demand for such office space within the District and Warnham Parish itself’.</i></p> <p>The respondent then concludes that they support the ‘general policy background’ to the plan especially that set out in Policy W7 which protects employments interests. However, they:</p> <p><i>‘Recognise that the Parish has a deficiency of high-quality employment land. It is contended that the site at Station Road, Warnham is suitable for employment and commercial development, occupying a sustainable location and has the potential to offer up to 5.5 hectares of high-quality grade A office and employment space. We consider that the site should be allocated in the Neighbourhood Plan to provide future employment space to be brought forward over the Plan period’.</i></p>
Ref #21 West Sussex County Council	Comments	<p><i>‘Given that the Pre-Submission Neighbourhood Plan for Warnham includes the proposed allocation of housing on one site, it should be noted that this will be subject to the resolution of any highway safety and access issues at the planning application stage or as part of a consultation on a Community Right to Build Order. The County Council provided comments and general Development Management guidance in response to the previous consultation’.</i></p>

Reference	Policy No. Paragraph	Summary
		<p><i>'We query the change of previous policy W8 to an Aim (Aim 5), particularly following the recent approval of the footpath diversion proposal supported by Warnham Parish Council and set out in Aim 5. It is considered that the plan could further support the delivery of this and other footpath improvements in the parish by this being policy rather than an Aim of the plan'.</i></p>
Ref #22 Environment Agency	Support	<p><i>'Having reviewed the Warnham Neighbourhood Plan and based on the issues within our remit we have no comments to make in relation to the Plan'.</i></p>
Ref #23 Gladman Developments Limited	Have Comments	<p>The respondent goes through the legal requirements of a neighbourhood Plan to meet the basic conditions. Noting the publication of the revised National Planning Policy Framework (NPPF), with paragraph 214 stipulating that the any plan submitted before 24 January 2018 will be examined under the old NPPF (2012) to help with the transition, therefore this response has been prepared against the previous NPPF (2012). It carries on by noting requirements of Qualifying Bodies, Neighbourhood Plans and Local Planning Authorities. These include paragraph 16 which states that neighbourhood plans should support strategic policies, paragraph 17 making it clear plans should create a framework resulting in decisions being made with high predictability and efficiency. Paragraph 184 states that Local Planning Authorities should ensure they have an up-to-date Local Plan and that the Neighbourhood Plan aligns with the Strategic Policies and support sustainable growth opportunities.</p> <p>The respondent notes the Secretary of State updated in the Neighbourhood Planning chapter of the Planning Practice Guidance (PPG) on 11 February 2016 and 19 May 2016. These updates make clear the requirements of undertaking a review of the plan where the evidence base for the plan is not considered to be robust enough. PPG also stipulates that a Neighbourhood Plan should not put forward policies which restrict development. With this in mind, the respondent has <i>'reservations regarding the WNP'S ability to meet the basic conditions (a) and (d)'</i>.</p> <p>Policy 15 of the Horsham District Planning Framework (HDPF) and how Neighbourhood Plans need to allocate sites for at least 1500 dwellings. Further noting that Policy 15 <i>'does not set specific targets for neighbourhood areas and as such to meet the requirements of the Framework the plan should not seek to constrain potential sustainable development from coming forward'</i>.</p>

Reference	Policy No. Paragraph	Summary
		<p><i>'It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend alternative options that should be explored prior to the Plan being submitted for Independent Examination'.</i></p> <p>The respondent states that they are concerned by the plan's vision and objectives and how they speak through the policies. It is argued that there is a confliction with paragraph 184 of the NPPF (2012). <i>'For example, seeking to safeguard the tranquil environment whilst not exceeding historic housing growth does not suggest a positive framework to base the plan upon'.</i></p> <p>On Policy W1 the respondent argues that focusing on development within the Built Up Areas Boundary is a negative approach, leading to settlement limits that would not allow sustainable development to come forward. This sees confliction with the NPPF as it is clear that sustainable should go ahead without delay. This would also restrict suitable development. Added to this, there is a lack of clarity as to whether the HDPF housing allocation will be met through Neighbourhood Planning, therefore a more positive approach to the development adjacent to the settlement boundary is needed. Failure to do this would see confliction with paragraph 14 of the NPPF.</p> <p>Regarding Policy W2 the respondent made the following comments:</p> <p><i>'Noting that following the initial Regulation 14 consultation, AECOM have undertaken a Housing Needs Assessment it is disappointing that the proposed housing target from this report suggests a housing target less than proposed in the WNP. This is despite many of the scenarios considered being well in excess of the suggested figure. Whilst it may have been agreed with the Council that the housing target of the WNP is appropriate for Warnhams role in the settlement hierarchy and as a proportion of meeting the 1500 home target from the HDPF, this is not based on a detailed assessment of need in Warnham'.</i></p> <p><i>The assessment should be based on continuing the vitality and sustainability of Warnham to ensure that the current level of services and facilities can be maintained over the plan period. Gladman would suggest that for this to be the case the level of housing would need to be significantly in excess of the currently proposed 50, a level which would currently fall short of historic growth rates from a time when housebuilding has been constrained. Delivering additional development above 50 would still be in general conformity with the HDPF, supporting the Council's position in the delivery of 1500 dwellings through neighbourhood plans, to which there is currently a significant shortfall'.</i></p>

Reference	Policy No. Paragraph	Summary
		In conclusion the respondent reiterates its argument that the WNP does not meet the basic conditions (a) and (d) as stipulated in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended).
Ref #24	Oppose	<p><i>‘The proposed site would need access to it from a single track road or a road with poor visibility. The traffic in the village would be increased dramatically if this site was to be developed Warnham village previously agreed to developing the land on the South side of Bell Road. This site has access to the A24 without the traffic having to come through the village. Warnham Parish council objected to planning permission on 6 units being developed at Cidermill Farm, Warnham on the basis of the excess traffic.</i></p> <p><i>The site that should be developed is the South side of Bell Road, Warnham which was previously agreed by the village. The land owner should not be able to dictate where the development takes place in the village. We need houses in the village, but in the correct place. The proposed site is not the right place’.</i></p>
Ref #25 Natural England*	Comments* *Compared the plan against the NPPF 2018 not 2012. For the purpose of plan making, Paragraph 214 of the NPPF states that any Plan submitted on or before 24 January 2019 will be examined against NPPF 2012.	<p>The responded is in support of Policy W1 stating that <i>‘Focusing new development within the built-up area boundary minimises development in greenbelt and green-field land’</i>. This supported by Section 13 of NPPF 2018.</p> <p>On Policy W5 the respondent see there being a positive contribution to retention and enhancement of hedgerow, whilst stating that the aim of residential development to protect and preserve priority habitats will minimise impacts on biodiversity plus protect existing ecological networks. It is also sees the plan’s requirements to provide good pedestrian and cycle connectiosn to public transport and services shall reduce private vehicle use. The respondent notes that this is in line with <i>‘NPPF (8. 170. 174. & 175.) and the DEFRA 25 year plan’s aims (1.1.). NPPF (148. & 170.) and is especially important in section 9’</i>.</p> <p>The respondent also suggests the following modifications:</p> <p>The respondent argues that the plan introduces keys concept of the NPPF and DEFRA 25 year plan, ecological protection and net gains. However the respondent does feel that should protect and preserve Local Green Spaces and Ancient Woodland. <i>‘This policy should also protect and preserve local green spaces and ancient woodland along with priority habitats’.</i></p> <p>The suggested wording proposed by the respondent for this policy is: <i>“d) they protect, and preserve <u>and enhance: ancient woodlands, local green spaces and priority habitats;</u>”</i></p>

Reference	Policy No. Paragraph	Summary
		<p>The respondent supports Policy W6 as the requirement for development to provide and protect accessible green space and ecological networks shall see improvement to the lives of those with mobility issues and biodiversity net gain. The following improvements are suggested: <i>'Policy W6 should incorporate GI, biodiversity net gain, ecological networks, ecosystem services and natural capital concepts. Developments at WNDP 1 should have the same requirements suggested in my improvements for policy W5. The development of the residential gardens should be appropriate for the local area and existing ecological network it is replacing. Consider requiring surface water drainage at WNDP 1 to be achieved by Sustainable Urban Drainage Scheme (SUDS) rather than traditional drainage methods such as gully pots. These SUDS can be valuable GI assets in their own right and also filter out pollutants from surface water run off providing an ecosystem service and natural capital'</i>.</p> <p>Both Aim 5: Footpath And Cycle Route Infrastructure & Aim 6: Bus Infrastructure are supported by the respondent as <i>'Improving bus services will reduce reliance on private vehicle use which will help reduce emissions and improve the air quality of Warnham'</i>.</p> <p>Other comments: <i>'As well as interweaving the concepts of Green infrastructure and biodiversity net gain throughout the neighbourhood plan we strongly recommend implementing a specific policy or aim for these concepts. This policy/aim should make a commitment to achieving biodiversity net gain, outline what GI features are important to Warnham and indicate what how Warnham would like its GI assets to develop & improve in the future. This policy/aim could also utilize natural capital concepts. The NDP should also contain a map of the whole parish showing priority habitat and ancient woodland as noted in our response to the Warnham neighbourhood plan HRA screening report, issued on 27/04/2018'</i>.</p>
Ref #26 Horsham District Council	Support	<p>The respondent supports the Warnham Neighbourhood Development Plan. The respondent notes that the village of Warnham is identified as a medium village under the settlement hierarchy of Policy 3 of the Horsham District Planning Framework (HDPF). Policy 15 (4) of the HDPF, stipulates that all Neighbourhood Plans are expected to accommodate its fair proportion of at least 1500 homes. With this in mind HDC state that</p> <p><i>'The delivery of a minimum of 50 dwellings and accompanying infrastructure along with recent permissions within the village is considered to be in proportion to the scale and size of the village in accordance with Policy 3: Settlement Hierarchy and meet local needs taking account of constraints to delivery that affect this particular parish'</i>.</p>

Reference	Policy No. Paragraph	Summary
		<p>HDC states that the wider strategic housing issues should be an issue for the District Council and the Local Plan review, this if a more appropriate mechanism to consider the wider district housing need as <i>'it is not for Neighbourhood Plans to deal with complex strategic issues, nor are they required to do so in statute or government policy'</i>. The issues of wider strategic housing will come forward in the Local Plan review next year, which will also go through the Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA).</p> <p>HDC officers considered the plan to have a degree of inconsistency as Policy W2 (1) states around 50 units whilst Policy W2 (2) states a minimum 50 dwellings over the plan period, whilst the plan define the term 'around' as being that define.</p> <p><i>'Taking account of the need to ensure that sufficient homes are delivered in Horsham district, including Warnham parish, together with the provisions in the recently updated NPPF, which are already a material consideration for the determination of planning applications, HDC is of the view that the plan should set out that the 50 is a minimum number'.</i></p> <p>With this in mind, the council welcomes paragraph 1.1 in the plan which stipulates there being a need to consider a full or partial review of the plan. This will be undertaken in an appropriate timeframe when the district council undertakes a review of the district wide housing need as it rolls forward the HDPF. As such <i>'this is a positive measure and helps to demonstrate that the parish has sought to ensure that plan is in general conformity with national planning policy'</i>.</p> <p>It is the view of HDC that the steering group has undertaken the relevant engagement with stakeholders during a comprehensive assessment of sites in the allocation of their neighbourhood plan which is supported by the Sustainability Appraisal. HDC also considers the plan and housing proposals, notwithstanding any recommended modifications made by the Examiner, meets the basic conditions and the allocation will make a positive contribution to the district housing in accordance with Policy 15 of the HDPF. The needed update of the SEA/SA, noted during Regulation 14, has been addressed.</p> <p>A tabulation of comments on the plan, policies, criteria and any other issues is attached to the representation. As a general comments it makes observations on where the plan has inconsistently applied the term 'around 50' dwellings, with these being recommended to be changed to 'a minimum of 50'. Whilst Figure 1.1 deemed sufficient, but in resolution as it seems hard to read.</p>

Reference	Policy No. Paragraph	Summary
		<p><i>The paragraph mentions that Warnham is classified as a 'Medium village' but fails to mention under which policy. This should be amended to:</i></p> <p><i>"Under Policy 3 of the HDPF Warnham is a 'Medium Village'...."</i></p> <p>Policy W5 should be amended to read as follows:</p> <p>2 (b) <i>"...in accordance with Policy W10 <u>W9</u> (Parking standards for new residential development);"</i></p>