

West Hoathly Neighbourhood Plan - Summary of Representations

Ref#	Cmt#	Respondent	Organisation	Behalf Of	Policy	Type	Comments
164		Ms C Gibbons	Southern Water		New	Object	<p>We can find no policies to support the delivery of new or improved infrastructure, which is required to serve new development identified in the Neighbourhood Development Plan (NDP). Without this policy provision, the NDP does not meet the basic conditions necessary for a NDP, namely to have regard to national policies and contribute to the achievement of sustainable development.</p> <p>National policies and guidance Southern Water is the statutory sewerage undertaker providing wastewater services to West Hoathly. Southern Water has a statutory duty to serve new development, and is committed to ensuring the right wastewater infrastructure in the right place at the right time in collaboration with developers, the parish/town council and the planning authority. The adopted West Hoathly Neighbourhood Plan and adopted Mid Sussex Local Plan will inform Southern Water's investment planning. Adoption provides the planning certainty required to support investment proposals to Ofwat, the water industry's economic regulator. Investment proposals are prepared every five years through the price review process. The next price review is this year (2014). Ofwat's price determination will fund the investment programme in the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025.</p> <p>Although there are no current plans, over the life of the neighbourhood plan it maybe that we need to provide new or improved infrastructure. Page 8 of the National Policy Statement on Wastewater states that 'Waste water treatment is essential for public health and a clean environment. Demand for new and improved waste water infrastructure is likely to increase in response to the following main drivers: More stringent statutory requirements to protect the environment and water quality; Population growth and urbanisation; Replacement or improvement of infrastructure; Adaption to climate change. The Government is taking measures to reduce the demand for new waste water infrastructure in England.....However, there will still be a need for new waste water infrastructure to complement these approaches and ensure that the natural and man-made systems are able to function effectively together to deliver a wide range of ecosystem services and other benefits to society'.</p> <p>Accordingly, we seek policy provision to support new or improved utility infrastructure. Such policy provision would also be in line with the main intention</p>

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							<p>of the National Planning Policy Framework (NPPF) to achieve sustainable development. For example, one of the core planning principles contained in paragraph 17 of the NPPF is to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'. Also paragraph 157 of the NPPF requires positive planning for development and infrastructure required in an area.</p> <p>Our proposed policy provision supporting the delivery of utility infrastructure would enable two of the basic conditions necessary for a NDP to be met, namely: to have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development.</p> <p>Proposed amendment To ensure consistency with the NPPF and facilitate sustainable development, we propose the following additional policy in the Neighbourhood Plan:</p> <p>"New residential and commercial development will be permitted only if sufficient capacity is either available, or can be provided in time to serve it.</p> <p>New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan."</p>

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192		Mr C Owen	West Sussex County Council			Support	<p>Thank you for the opportunity to comment upon the submitted West Hoathly Neighbourhood Plan.</p> <p>Given that the Submission Neighbourhood Plan for West Hoathly Parish includes the proposed allocation of small scale housing sites, 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 general Development Management guidance in response to the Pre-Submission consultation earlier this year.</p> <p>The Plan makes reference to highway improvements desired by the Parish Council, for example in Policies WHP9A Road Improvements and WHP9B Planning Obligations and in referring on page 10 to the County Council's inclusion of traffic calming measures on the C319 road in its Infrastructure Plan priorities. Wherever the required funding will be drawn from it should be noted that the implementation of such improvements will be contingent upon proper processes of design and consultation</p>

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15043		Mrs A Purdye	Gatwick Airport Ltd			Support	<p>Thank you for your email dated 23 October 2014, regarding the above mentioned document. Our comments are as follows:</p> <p>Gatwick Airport Ltd are a statutory consultee and we would ask that any future development complies with aerodrome safeguarding requirements as detailed in ODPM/DfT Circular 01/2003 'Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas:</p> <p>The Town & Country Planning (Safeguarded Aerodromes Technical Sites and Military Explosives Storage Areas) Direction 2002.</p> <p>Some of the matters that we would need to take into consideration are, building design including heights. No buildings or structures are to exceed 209.35m Above Ordnance Datum (AOD) in this area. Other matters are landscaping, water bodies and any other bird attractants, renewable energy with particular regard to wind turbines and large areas of solar panels.</p> <p>We are happy to work with yourselves and developers at the early stages of any proposed developments to advise on aerodrome safeguarding requirements. Please be advised that the comments given are without prejudice to the consideration of any planning application which may be referred to us pursuant to Planning Circular 01/2003 in consultation under the safeguarding procedure.</p>

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15159		Mr N Webster	Mid Sussex District Council			Support	<p>Thank you for the opportunity to comment on the West Hoathly Neighbourhood Plan. Mid Sussex District Council welcomes the embracing of Neighbourhood Planning and the recognition of the potential benefits that such an opportunity presents to the community of West Hoathly. The District Council commends the effort afforded to delivering a Neighbourhood Plan for the parish.</p> <p>The District Council is satisfied that all the necessary legal requirements have been met in the preparation of the Neighbourhood Plan. The Plan represents a forward thinking document that will help to meet future needs and make a positive contribution to the environment, local economy and housing needs in the Parish.</p> <p>The District Council looks forward to working with the Parish Council to progress the Neighbourhood Plan to its Examination.</p>

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16481		Mr D Wilson	Savills	Thames Water Utilities Ltd		Support	<p>MID SUSSEX – WEST HOATHLY NEIGHBOURHOOD PLAN – COMMENTS ON BEHALF OF THAMES WATER</p> <p>Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water’s appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.</p> <p>Thames Water are the statutory sewerage undertaker for the north western part of the Mid Sussex District, but Thames Water have confirmed that West Hoathly lies outside their operational area.</p> <p>Thames Water have confirmed that Southern Water is the statutory sewerage undertaker and South East Water is the statutory water undertaker for the area under consultation. Therefore Thames Water have no additional comments on the draft Neighbourhood Plan.</p> <p>I trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.</p>

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16605		Mr Tom Bowkett	Sport England			Support	<p>Thank you for consulting Sport England on the above Neighbourhood Plan.</p> <p>Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England’s role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, ‘A Sporting Future for the Playing Fields of England – Planning Policy Statement’. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations. http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design</p>

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							<p>guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>If you need any further advice please do not hesitate to contact Sport England using the contact details below.</p>
16606		Ms Elizabeth Cleaver	Highways Agency			Support	<p>Thank you for inviting the Highways Agency to comment on the West Hoathly Neighbourhood Plan Submission.</p> <p>The Highways Agency is an executive agency of the Department for Transport. We are responsible for operating, maintaining and improving England's strategic road network on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network.</p> <p>We have reviewed the consultation and do not have any comments.</p>
20068		Ms Hannah Hyland	Environment Agency			Support	<p>Thank you for consulting the Environment Agency on the above Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.</p> <p>We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest. We have provided you with a copy of our Neighbourhood Plan Checklist for Mid Sussex which sets out the issues that should be considered in a Neighbourhood Plan.</p> <p>We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1.</p> <p>If you have any queries or need any further information please contact me.</p>

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20069		Mr Euan Campbell			WHP1 3C	Object	<p>I note that the document states " The design for vehicular access should ensure the current convenient and safe use of Bluebell Lane for existing residents, walkers and horse-riders using the bridleway is maintained" I am concerned at the lack of detail regarding where the access point would be to the proposed development site. Bluebell Lane is approximately 250 metres long and I feel it is critical to state where exactly the proposed access would be situated before asking residents of the parish to vote on whether or not to proceed with the Plan. Another important point I wish to make is that Bluebell Lane is a privately owned track and as stated in the Plan has public bridleway classification.. As the Parish Council will testify, during the last few months, I have been trying to establish the identity of the legal owner of Bluebell Lane, without success. I am curious as to how any development can proceed without the permission of the owner of Bluebell Lane as surely their permission would need to be sought in order to build an access point to the proposed development site. Another point that I feel needs to be brought to your attention is that Bluebell Lane is currently maintained by the residents of the 20 properties situated on it. If the proposed development occurs, it would lead to potentially an additional 20-30 vehicles using Bluebell Lane on a daily basis. In its current condition, Bluebell Lane would simply not be able to cope with this additional traffic. Given that it is forbidden to surface it with tarmac (due to it being a public bridleway) I would like assurances that the condition of Bluebell Lane will not suffer due to the proposed development going ahead. I am disappointed at the lack of detail in the Plan on how the extra traffic that the proposed development would bring would be dealt with. Station Road already has traffic issues with access/parking as it serves the many residents of adjoining streets as well as the the Organic Cafe and the</p>

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							<p>brickworks situated on Hamsey Road. At times the traffic situation on Station Road is what can only be described as verging on dangerous and I am concerned that the extra traffic created by the proposed Bluebell Wood development would only add to the existing problems that I witness in a regular basis. I understand that it is essential for additional housing to be created within the Parish however am disappointed at the lack of detail being put forward on certain aspects of the plans that have been submitted by the Parish Council.</p>

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20070		Ms Catherine Tonge	Natural England			Object	<p>Thank you for consulting Natural England on your Neighbourhood Plan. My brief comments are as follows:</p> <p>We welcome the commitment to protecting and enhancing the local landscape character and aspiration to keep development small scale and within existing built up areas, provided all development is discussed with High Weald AONB. We are, however, concerned about the loss of BAP woodland identified in the proposed housing allocation sites. If no viable alternatives can be found, any development will need to consider and respond to the value of this habitat and its biodiversity and work to minimise loss and potential for harm.</p> <p>We support the recognition of the proximity of the internationally important Ashdown Forest and commitment to work with Mid Sussex District Council regarding the provision of SANGs and SAMM within the area. We also note that policy WHP16 specifically addresses Alternative Green Space. Although we certainly encourage any such provision for the well-being of the community and enhancement of biodiversity, SANGs intended to mitigate for Ashdown Forest disturbance must be agreed at a district level to ensure the most effective site is provided.</p> <p>We welcome the commitment to protect and improve condition of the area's ancient woodland in the Sustainability Appraisal (1/Env) and would like to see this also highlighted in the plan itself. The plan could also be strengthened by including reference to protection of the other important habitats which exist within the parish as well as specific reference in the actual policies to the SSSIs which are mentioned in section 14 (Village and Countryside Landscape Features).</p> <p>Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing and commenting on your Neighbourhood Plan. Nevertheless, I hope you find these comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please contact me.</p>

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20071		Ms Nicola Hume	Persimmon Homes, Thames Valley			Object	<p>I am writing to make representations to the West Hoathly Neighbourhood Plan Consultation.</p> <p>Persimmon Homes supports the principle of the Neighbourhood Plan and the inclusion of site WHCS_06 Land adjacent to Cookhams. We do however, have reservations on the reliance placed upon the Local Plan (2004), having regard for paragraph 214 and 215 of the National Planning Policy Framework (NPPF). These paragraphs iterate that Local Plans policies, that were adopted since 2004, material weight is diminished depending on how closely aligned they are to the NPPF.</p> <p>Please find below our comments on specific policies within the Neighbourhood Plan.</p> <p>Section 14 – Villages and Countryside Landscape Features</p> <p>WHP1 Landscape (page 8)</p> <p>Persimmon recognises that the parish is in a sensitive landscape area due to its position within the High Weald Area of Outstanding Natural Beauty (AONB). In accordance with national and local policy new development within the Parish will need to take this into account. However, each site will need to be assessed on its individual merit and site specific circumstances. This will allow an informed decision on layout to be made, whilst taking into account the impact on the AONB.</p> <p>WHP4 Rights of Way (page 9)</p> <p>Persimmon recognise that the Neighbourhood Plan seeks to improve accessibility and we support this in principle. Not only would this allow improvement to accessibility but it would also improve the sustainability of the area as it increases the connectivity of West Hoathly Parish.</p> <p>Any footpath proposal should align with the emerging development proposal and take into consideration land control issues. In essence, a footpath link should not impact on the development of a specific proposal.</p>

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Section 15 - Traffic and Transport

WHP6 New Homes – Parking (page 11)

Persimmon recognise that a balance needs to be achieved within new residential development and compliance with local policy. We also note that on street parking has been identified as a local issue. However, we are concerned that policy, as currently worded, is overly restrictive. Each site needs to be considered individually for the appropriate level of parking that would be needed, and proximity of public transport to the prospective sites.

With the high level of car parking space provision for new dwellings we are concerned that it may lead to sites coming forward, having an excessively urban layout and feel, contrary to the nature of parish. This requirement could also lead to sub optimal use of land.

The policy requirements set by the Neighbourhood Plan are significantly more onerous than the current policy requirement of Mid Sussex District Council, Development and Infrastructure SPD (2006). We would strongly suggest that these standards reflect the policies within the Local Plan. It should also be noted that the Mid Sussex District Council Local Plan (2004), observes that an overprovision of off street parking can lead to an over reliance on private car use.

WHP9B Planning Obligations (page 11)

Persimmon note that the Neighbourhood Plan states that new development will be required to contribute toward a number of specific projects within the West Hoathly Parish. Any contributions made through Section 106 need to be accord with Community Infrastructure Levy (CIL) regulation 122. This regulation sets out that planning obligations should only be sought where they meet all of the following tests (i) necessary to make the development acceptable in planning terms; and (ii) directly related to the development; and (iii) fairly and reasonably related in scale and kind to the development.

Section 19 – Homes

WHP11 Infill Housing (page 13)

We recognise that infill housing provides an important source of urban capacity and could potentially meet a proportion of West Hoathly Parish's development needs.

The Plan identifies a number of larger sites (10+ dwellings) for future housing development, which land includes WHP13: WHCS_06 (Land adjacent to Cookhams). This specific site is located between established built frontages and was considered by Mid Sussex District Council as "infill development" within their Mid Sussex District Council Site Review for West Hoathly, Jan 2014.

WHP12 Housing Mix (page 14)

Persimmon notes the identified need for smaller dwellings within the Parish with a particular emphasis on 2-3 bed units (from the work completed by the Parish Council). We are concerned that this is overly restrictive; development should respond to local market conditions and demands. It is noted that there is a discretionary 'up to 25%' for 'other sized dwellings'. However, this is considered to be overly restrictive as it does not allow a site to be used to its optimal potential.

We note that there is potential conflict with the requirements of this policy, of 'at least 75%' smaller units, and policy WHP13b, 'reflect the design and density of the development should reflect the rural character of the settlement'. We note that the grain of development within the locality of the Land adjacent to Cookhams is larger properties, by having such a high proportion of smaller units it does not allow the potential new development to relate to the 'rural character of the settlement' and existing built form.

WHP13 Sites for New Homes (page 14)

We support the Parish in identifying sites within the Neighbourhood Plan area. It should be noted that while these sites are expected to come forward within the plan period, there is the potential for one or more of these sites to be delayed or withdrawn. For this reason the Parish should consider allocating additional capacity

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							to the identified sites and potentially highlighting some reserve sites.
							<p>WHP13b: WHCS_06 (Land adjacent to Cookhams) (page 14)</p> <p>Persimmon supports the inclusion of this site within the Neighbourhood Plan.</p> <p>We suggest that the settlement boundary, once establish, will need to include the allocated sites within the Neighbourhood Plan. This site presents an opportunity to infill/ round off the existing built form of Sharpthorne. We note that this site is bounded to the north, west and east by existing development and will be enclosed to the south by retained trees.</p> <p>We note that some of the wording within this policy is overly restrictive:</p> <p>(i) The area of land highlighted on Map C, as undeveloped area, needs to be informed by detailed analysis of the site. We note that the Parish require this undeveloped area to be gifted to the Parish or any other community body. We anticipate that a portion of the site would need to provide landscaping and amenity space. This is something that the owner would be able to discuss with the Parish in due course.</p> <p>(ii) Improving the Rights of Way network is a principle that Persimmon support. However, land control needs to be considered when looking to improve the network and the feasibility of this. The timing and route of the footpath would need to be carefully considered to allow any scheme on the site coming forward to not be precluded; both in terms of timing and layout.</p> <p>(iii) The policy sets out that there should be 'no more than 16 dwellings'. This policy wording is restrictive and needs to be informed by detailed analysis of the site. The policy should be inline with the guidance in the NPPF paragraph 47 'to boost significantly the supply of housing'. In accordance with the NPPF, and the reflect SHLAA analysis, we would suggest that the policy should set a minimum of</p>

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							16 dwellings. We agree that the design of the scheme should reflect the existing built form of the Parish. The design of the scheme should also be informed by analysis of the site.