

**Regulation 16 Consultation Responses Upper Beeding Neighbourhood Plan –
Regulation 16 Consultation – Summary of Representations**

Stakeholder Reference	Policy No. / Paragraph	Summary
Ref. 1	Policy 3	1. <i>'I'm still keen for you to remove the pound lane sites from the plan as per my previous email'.</i>
Ref. 2	Comments Policy 11	1. The respondent is posing the question as to why only 50% of Priory Field is being designated as Local Green Space? 2. The respondent suggests that the entire site be designated as Local Green Space.
Ref. 3	Oppose Policy 3 Policy 11	1. Respondent opposes Policy 3 on the grounds that the team have admitted there is insufficient suitable land available to meet the Local Development/Housing Need and felt unrealistic targets are proposed. Argues that the local infrastructure is not in place to accommodate the identified housing need. 2. The respondent disagrees with the Land at Pepperscoombe Lane being designated as Local Green Space in Policy 11, as they cannot see how this will benefit the local community.
Ref. 4	Oppose General	1. Oppose the plan due to infrastructure sustainability issues, flooding and inadequate drainage capacity and busy roads. The additional housing which will not be affordable for local residents. Suggest that the plan <i>'look at alternative locations to build this number of homes. The area is renowned for flooding yearly'.</i>
Ref. 5	Oppose UBNP – Regulation 19	1. <i>'It is a flood plain area you cannot build on this landThe traffic will cut through the street bramber as upper beeding residents already do so'.</i> 2. Suggest <i>'No building'</i>
Ref. 6	Oppose Policy 3 Paragraph 7.23	1. Opposes Policy 3 citing little local support, drainage capacity and flood risk. Furthermore, access routes in and out UB are poor via Hyde Lane and Saltings Way. The proposed development is outside the Built Up Area Boundary and it is felt the development will have detrimental effect on wildlife, trees and on the views of the SDNP with increased light pollution. As result of the increase in traffic there will be a loss of amenity to the quite Hyde Street.
Ref. 7	Oppose Policy 3	1. <i>Opposes the allocation made in Policy 3 as the number of homes will have a negative impact on resources in the village, especially roads running through the village, affect the South Downs National Park with light pollution and schools are full.</i>

Ref. 8 WSCC Estates	Support Policy 3	1. West Sussex County Council lends its support to this development, which contributes towards addressing the housing needs of the area.
Ref. 9 Waverly	General	1. The respondent (Waverly Borough council) has no comment to make.
Ref. 10	Support with Modifications Policy 3 7.23 to 7.31	1. The respondent would support the plan - provided that Policy 3 is removed, as the site is greenfield and in AONB. In addition flooding is at risk in this location. Therefore an alternative site 'Cement Works' has been put forward at initial PC meetings, as this is the preferred site for development by the local residents but this seems to have been ignored.
Ref. 11	Support with Modifications 6.6	1. Respondent feels that the amount of development outlined in the plan is too much, this affect the character of the village, with too much development proposed on green field land. The respondent feels that hat is needed is more detail on flood mitigation, different sites be allocated in plan (not greenfield), plan contributes to the environment, infrastructure provided before development and <i>'guarantee that a large portion of social housing would be provided'</i> .
Ref. 12	Policy 3 7.23 to 7.31	1. The respondent believes the plan have disregarded the wishes of local residents by supporting a large development of 70 houses in Policy 3. Planning applications has twice been rejected before and shouldn't be considered in the plan. The housing number in the AECOM Housing Needs Assessment needs to be reduced as smaller developments that have been identified over the parish would be more in keeping with local needs, but a large proportion of the land available falls in South Downs National Park or designated as level 3 flood risk and therefore rejected. NP should recognise Upper Beeding is not suitable for large development projects.
Ref. 13	Have comments Policy 3 7.23	1. <i>'Sites east of Pound Lane should not be considered for housing development as the access to this area is congested, narrow and unable to sustain the substantial increase in traffic to and from the proposed area'</i> . 2. <i>'Sites east of Pound Lane should only be considered for Housing Development if there was access to the North of the Village from Henfield Road'</i> .
Ref. 14	Have comments Policy 3 & 7.23	1. <i>'Land east of Pound Lane is not suitable for housing as it has insufficient access to the site, the road Hyde Lane is already very busy and if 70 houses were built you would probably have 140 cars plus added to the volume already using the road'</i> . 2. <i>'It would have to have another access road built north of the village to Small Dole'</i> .

<p>Ref. 15</p>	<p>Oppose Policy 3 SA/SEA 7.23 – 7.31</p>	<ol style="list-style-type: none"> 1. 'As this does not provide sufficient space for my comments to be made in full I have attached them'. <ol style="list-style-type: none"> 1) <i>This plan contradicts entirely previous objections by Upper Beeding Parish Council in 2014 (01/10/14 referencing DC/14/1744 and DC/14/1745)</i> 2) <i>This plan does not address adequately the objections and subsequent planning refusal by HDC (27/10/15 referencing DC/14/1744 and DC/14/1745)</i> 3) <i>Consider the proposed development to be a direct contravention of the following objective found in the 'West Sussex LLFA Policy for the Management of Surface Water', which highlights the NPPF 3.1.1</i> 4) <i>There is an inadequate solution to potential flooding let alone sodden ground and does not address HDC's own 'Horsham District Planning Framework Proposed Submission', sections 10.17 to 10.23 inclusive and the Revised 2010 SFRA.</i> 5) <i>Having so many houses being built in one area contradicts section 6.9 of the Neighbourhood Plan: 'that development should take place across a number of smaller sites rather than all being allocated within one or two substantial housing developments'.</i> 6) <i>Highway safety, inadequate parking and access, (7.24, 7.30 and 7.31). This fails to address the consequence of traffic as a result of the new development on the village as a whole. There is no practical solution to address the traffic bottlenecks in Hyde Lane and Pepperscombe Lane and Smugglers Lane.</i> 7) <i>'Sustainability Appraisal incorporating Strategic Environmental Assessment Dec 2018.' This does not address section 5 of the 'West Sussex LLFA Policy for the Management of Surface Water November 2018, specifically 5.3.5, 5.4.1, 5.4.2, 5.4.3, 5.5.2, 5.6.2 (the impact here is on the aquifers)</i> 8) <i>Southern Water expressed the need to address the sewerage issue in 2015 in its comments as regards DC/14/1744 and DC/14/1745. Where in the UBNP consultation is there any information aside from acknowledging the issue with sewerage is there a proposal. Building upwards of 70 houses and laying new pipes does not solve the issue of poor sewerage.</i> 2. The following suggestion is made: 'Examine further the viability and potential of the Cement Works site, and look for other brownfield sites or ones with better access, infrastructure and development potential'. 3. Attachment is added with further comments: 4. The respondent quotes the River Adur Catchment Flood Management Plan 2009 published by the Environment Agency which describes how 'extended periods of high water levels in the River Adur prevent drainage from land behind the defences. The respondent notes that 'UBNP has not described an adequate solution to address this problem. In fact it acknowledges the problem in 7.23 for one part of the development proposal'. 5. West Sussex Local Flood Risk Management Strategy (2013 – 2018)' report is noted, describing the reports analysis of severe and less severe events, which notes that Upper Beeding has experienced two substantive events in the past two years with these events more likely to happen. The respondent argues 'I do not see how Policy 3 addresses the 'West Sussex County
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<p>Ref. 16 The response is in 3 parts</p>	<p>Oppose Paragraph 7, Policy 3 and general comment</p>	<ol style="list-style-type: none"> 1. Part 1: Sites Little Paddocks and Land East of Pound Lane should be removed from the plan. Applications for these sites for similar sized development have been refused previously. Development which is viable on the site would result in unsustainable overdevelopment. Environment Agency will not support development on this site due to flooding. <i>'A lesser development is considered not viable'</i>. The inclusion of these sites are not supported by local residents, notes lack of support at Regulation 14 consultation. Suggests that the plan should come forward with smaller sites being allocated. 2. Attachments consist of pictures showing flooding in Little Paddocks with no dates given. Attached is further comments. States that a previous application on the site (DC/14/1744) was rejected by HDC on 27 October 2015 and quotes the reasons given for the then refusal. Before stating that they do not feel the site should allocated with the same constrains as when DC/14/1745 was refused planning permission. The combined development of 2 or 3 of the sites would result in far more dwellings impacting upon local infrastructure and the local countryside. 3. Current traffic problems will be added to with a bottleneck in Hyde Lane and Pound Lane, adjacent to Pound Cottage. Increasing in commercial traffic coming from industrial site at Newbrook Farm is a issue in Pound Lane which is in fact a footpath (2767). Pound Lane is currently not an adopted highway and upkeep is paid for by residents. Development could lead to obstruction for the emergency services. Existing roads provide no solution for the current access problems, these

		<p>roads are congested. Development will ‘exacerbate’ the flooding problem, respondent mentions attached pictures of flooding ‘taken prior to the cessation of clearing of streams by EA’. Respondent states that ‘a report by the EA on 20th November 2018, sets out their objections to the development of the sites citing that the submitted FRA did not take into account the impacts of climate change making no allowance for same’. Adding that with current issues, a small change will be ‘catastrophic’.</p> <ol style="list-style-type: none"> 4. Argues that the neighbourhood planning process has not been explained well to residents, left ‘unaware of the various stages and when they have opportunity to comment. Many do not understand the difference between the NP and the planning applications by Rydon Homes, who (despite their obvious financial interest) have collaborated in the production of the NP’. Respondent quotes a representation made by Campaign for Protecting Rural England (CPRE) on the DC/18/2325 application dated 22 December 2018. 5. Part 2: ‘The Plan for Upper Beeding does not have a non-technical summary. It is unacceptable to expect all residents of Upper Beeding to read and fully understand the full document in its current form. It would seem that this is by design. The Plan represents the wishes of the NP Team and not that of the residents. The Plan should contain a suitable summary to provide sufficient concise and truthful information to enable all residents to make an informed decision as to whether the Plan supports their requirements and vision for the future of the village’. 6. Part 3: Rydon's withdrawal of their application to develop the sites east of Pound Lane underlines the fact that these sites are unsuitable. Sites east of Pound Lane should be removed from the plan. Their inclusion adversely impacts the credibility of the Plan’.
Ref. 17	Oppose Policy 3	<ol style="list-style-type: none"> 1. ‘This version of the NP includes 2 plots of land in Pound Lane which, at the Pre submission vote of last August, was voted off by a majority of 84% by parishioners who took part (HDC NOTE: this is believed to be Regulation 14 consultation). I had no knowledge of this vote until told by a neighbour. Does my vote not count? I cannot remember receiving any literature informing me of this’. 2. The respondent continues by noting that a meeting was held between Rydon Homes, the UBNP team and HDC officers ‘on how to go forward’ on the sites on Pound Lane. The respondent feels that the UBNP team obviously thought his to be ‘viable’ despite the described vote by residents saying that the site was too constrained. Feels that the meeting is ‘perverse’ as the plan states that it smaller pieces of land with smaller developments ‘is the way forward’. 3. Respondent argues that the Pound Lane sites will have a negative impact on ‘unreliable sewage system’, narrow ‘pot holed lanes’, flooding and commercial and construction traffic. Potential loss of habitat, flora fauna and privacy whilst Village parking and navigation is ‘extremely tricky’. The respondent feels that the UBNP team already know this, as they showed objections to the original planning applications made to Policy 3 sites in 2014. ‘Now apparently, it’s fine to go ahead and expect the villagers to put up with this. Please refer to HDC Planning DC/14/1744 & 1745 to see the many objections to the submission of 2014 and also the same with DC/18/2318 & 2325’.

		<p>4. Respondent asks why the plan, in the pursuit of downsizer dwellings, is looking to allocate these in the northern part of the village far from shops, services and buses in village centre with 'uneven pavements' along the route to them. Residents are confused by the definition of affordable housing. The Grade II Listed building on the Policy 3 site <i>'must be preserved and the setting of this must not be compromised'</i>. Respondent state that they have been 'advised by a councillor' that they vote yes to the plan as 'it could be a lot worse!!'. Argues that to vote in favour of the plan with Policy 3 allocations would be 'a total disaster for so many reasons'.</p>
<p>Ref. 18</p>	<p>Oppose Policy 3 7.23 - 7.31 SA/SEA</p>	<ol style="list-style-type: none"> 1. 'As this does not provide sufficient space for my comments to be made in full I have attached them'. <ol style="list-style-type: none"> 1) <i>This plan contradicts entirely previous objections by Upper Beeding Parish Council in 2014 (01/10/14 referencing DC/14/1744 and DC/14/1745)</i> 2) <i>This plan does not address adequately the objections and subsequent planning refusal by HDC (27/10/15 referencing DC/14/1744 and DC/14/1745)</i> 3) <i>Consider the proposed development to be a direct contravention of the following objective found in the 'West Sussex LLFA Policy for the Management of Surface Water', which highlights the NPPF 3.1.1</i> 4) <i>There is an inadequate solution to potential flooding let alone sodden ground and does not address HDC's own 'Horsham District Planning Framework Proposed Submission', sections 10.17 to 10.23 inclusive and the Revised 2010 SFRA.</i> 5) <i>Having so many houses being built in one area contradicts section 6.9 of the Neighbourhood Plan: 'that development should take place across a number of smaller sites rather than all being allocated within one or two substantial housing developments'.</i> 6) <i>Highway safety, inadequate parking and access, (7.24, 7.30 and 7.31). This fails to address the consequence of traffic as a result of the new development on the village as a whole. There is no practical solution to address the traffic bottlenecks in Hyde Lane and Pepperscombe Lane and Smugglers Lane.</i> 7) <i>'Sustainability Appraisal incorporating Strategic Environmental Assessment Dec 2018.' This does not address section 5 of the 'West Sussex LLFA Policy for the Management of Surface Water November 2018, specifically 5.3.5, 5.4.1, 5.4.2, 5.4.3, 5.5.2, 5.6.2 (the impact here is on the aquifers)</i> 8) <i>Southern Water expressed the need to address the sewerage issue in 2015 in its comments as regards DC/14/1744 and DC/14/1745. Where in the UBNP consultation is there any information aside from acknowledging the issue with sewerage is there a proposal. Building upwards of 70 houses and laying new pipes does not solve the issue of poor sewerage.</i> 2. The following suggestion is made: 'Examine further the viability and potential of the Cement Works site, and look for other brownfield sites or ones with better access, infrastructure and development potential'. 3. Attachment is added with further comments:

		<ol style="list-style-type: none"> 4. The respondent quotes the River Adur Catchment Flood Management Plan 2009 published by the Environment Agency which describes how 'extended periods of high water levels in the River Adur prevent drainage from land behind the defences. The respondent notes that <i>'UBNP has not described an adequate solution to address this problem. In fact it acknowledges the problem in 7.23 for one part of the development proposal'</i>. 5. West Sussex Local Flood Risk Management Strategy (2013 – 2018)' report is noted, describing the reports analysis of severe and less severe events, which notes that Upper Beeding has experienced two substantive events in the past two years with these events more likely to happen. The respondent argues 'I do not see how Policy 3 addresses the <i>'West Sussex County Council's Response to the Government Consultation on Proposed Amendments to Planning and Policy Statement 25: Development and Flood Risk'</i>, which approved the Government's changes in section 2.2.' 6. <i>'It is not sustainable and certainly does little to address the EU Flood Directive that was transposed into UK law as 'The Flood Risk Regulations' 10/12/09. Neither does it address the European Directive 2001/42/ED (The SEA Directive) which has at its core the protection of the environment and to which the West Sussex Flood Risk Management Strategy requires. This relates specifically to: "Population and human health; Biodiversity, flora and fauna; Soil; Water; Air; Climatic factors; Material assets; Cultural, architectural and archaeological heritage.'</i> 7. Questions why the plan agree with AECOM's conclusions on the site which go against the conclusions made in the Strategic Housing Land Availability Assessment and Parish council's opinion in 2014. 8. Argues that in paragraph 6.9 a statement is made that the strong view of the community is to allocate housing on a number of smaller sites. It is argued that the plan's proposal to allocate 70 – 109 houses on two adjacent sites 'accounting for a significant majority of the housing requirements is a contradiction (as per page 45 of the UBNP). What is a greater concern is that this number may just be the minimum as AECOM suggest yields of 33-87 houses and 16-44 houses in respectively Little Paddocks, Upper Beeding and Land east of Pound Lane, Upper Beeding (page 46)' 9. The findings in the 'Provisional Road Traffic Estimates Great Britain: July 2017 - June 2018' show 'an increase in lorry and van traffic by respectively 1.3% and 3.7%'. There was no mention in Policy 3 of the impact of van traffic flow increase, noting a Royal Mail report in September 2018 stating they've seen a 9% increase in online orders. 10. The plan has not sufficiently addressed the impact on the 'existing stress' currently on local school and medical centre.
Ref. 19	Oppose Policy 3	<ol style="list-style-type: none"> 1. Opposes Policy 3, noting respondents rejected it during Regulation 14 consultation and refusal of planning applications (DC/14/1744 & 1745). Feels Policy 3 will lead to 'over development', noting flooding on the site and the Environment Agency's concerns raised in recent planning applications (DC/18/2325 & 2138). Argues that Policy 3 should be omitted.
Ref. 20 Southern Water	Oppose Policy 3 Policy 4	<ol style="list-style-type: none"> 1. <i>'Southern Water has undertaken a preliminary assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for this proposal. Our assessment reveals that the local sewerage system requires reinforcement in order to accommodate additional development. This is not a constraint to development however, provided planning</i>

		<p><i>policy for this site ensures that occupation of the proposed development is phased to align with the delivery of sewerage network reinforcement’.</i></p> <ol style="list-style-type: none"> 2. <i>‘If development is permitted to proceed without such policy provision, Southern Water has limited powers to prevent connection and the system could become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 170(e) of the National Planning Policy Framework (NPPF) 2018, which requires the planning system to prevent both new and existing development from contributing to pollution’.</i> 3. <i>‘Furthermore, there could be a risk that the necessary local sewerage infrastructure will not be delivered in time to service the proposed development, unless delivery is supported by planning policies and subsequently in planning conditions. This is supported by the principles of sustainable development identified in paragraph 8 of the NPPF, which may be achieved by: ‘identifying and coordinating the provision of infrastructure’. Our approach is further supported by paragraph 28 of the NPPF, which states that non strategic planning policies should be used by communities to address the provision of infrastructure. The National Planning Practice Guidance specifies that ‘Adequate water and wastewater infrastructure is needed to support sustainable development’. The following suggestion is made for Policy 3:</i> 4. <i>Any proposal must be delivered in accordance with the following principles: [...] <u>13. Occupation of the development is phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.</u></i> 5. <i>The following suggestion is made for Policy 4: Any development will need to address the following: [...] <u>9. Occupation of the development is phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.</u></i>
Ref. 21	Oppose Policy 3	<ol style="list-style-type: none"> 1. <i>‘Governance’: ‘We have asked for a copy of the NP Teams Terms of Reference. None has been provided. We assume there is no ToR. Therefore the remit of the Team and members is not laid out and they can be acting how they feel fit with their own personal agendas, rather than with clear guidance set by the Parish Council for the benefit of the village’.</i> 2. <i>Online activity: HDC notes that the respondent makes points that are in dispute regarding online and offline comments made by the Parish Council and Neighbourhood Planning team.</i> 3. <i>Issues with Parish Council consultation process: HDC notes the respondent’s comments on transparency during the development of the Neighbourhood Plan, questionnaires, meetings and consultation process.</i> 4. <i>Issues with Horsham District Council consultation process: Respondents notes that there were mistakes during the Regulation 16 consultation led by HDC. This saw technical issues with HDC’s Neighbourhood planning email address bouncing back residents’ emails. ‘Warnham’ had been left on the e-form instead of Upper Beeding. This was amended by</i>

		<p>HDC team and consultation was led for another week, however, the respondent noted that some residents were put off by this and the term ‘Warnham’ was still there on 4 March 2019.</p> <p>5. The respondent describes the DC/14/2037 on Newbrook Farm rejected by HDC in 2014 and the then objections raised on the application by Parish Council, South Downs Society, Campaign to Protect Rural England (CPRE) and South Downs National Park Authority (SDNPA). Noting that <i>‘SHELAA site SA053 was rejected due to proximity to the floodplain (among other reasons). This site is now SHELAA reference SA488 and has been included in the NP despite its ongoing unsuitability’</i>. Respondent argues that the infrastructure is inadequate and will be unable to cope before stating that they feel the transport assessment is ‘flawed’ which has been pointed out by another resident, quoting another resident’s comments on paragraphs 3.8, 5.9, 8.5, 8.8 and 8.9 of the transport assessment.</p> <p>6. It is stated that the sites have ‘substantial flooding for a third of the year, every year’. Noting that West Sussex County Councillor David Barling has written voicing his concerns regarding the flooding. It is also noted that <i>‘The Environment Agency has objected to the applications based on flooding, but this has been disregarded when formulating the Plan’</i>. The respondent quotes West Sussex LLFA Policy for the Management of Surface Water (November 2018) SuDS Policy 2:1, 5.3.7, 5.3.10 and Policy 3:1.</p> <p>7. The respondent then concludes that the plan has not been in line with correct governance arrangements, there has been no terms of reference in place, the process has not been transparent and the processed is seen to have ‘skewed misinformation ‘to’ sway voters’. It is argued that the plan is based on the UBNP wishes and not those of the majority of residents with the plan needing to be called into question and should be rejected. Attached to the representation also is:</p> <ul style="list-style-type: none"> • Picture of Little Paddocks Flooding in 1995 • Environment Agency response to DC/18/2318 dated 20 November 2018 • Another picture of Little Paddocks flooding not dated • Campaign to Protect Rural England Sussex (CPRE) objection to DC/18/2318 dated 22 December 2018 • West Sussex County Council Cllr. David Barling letter objection to DC/14/1744 and DC/14/1745. • South Downs National Park Authority letter on DC/18/2325 dated 8 November 2018 • Worthless Campaign letter from Mass Headteacher Action dated 28 September 2018 • Screen shots of Upper Beeding Parish Council online activity • Upper Beeding Parish Council objection to DC/18/2318 date 29 November 2018
Ref. 22	Oppose Policy 3 General	<p>1. The respondent could not find the Neighbourhood Plan on the HDC website. The respondent quotes correspondence from the Upper Beeding Parish Council in 2013 explaining the Neighbourhood Plan’s responsibilities. Describes the objections raised to the two planning applications (DC/14/1744 and DC/14/1745) and arguing that the sewage system is at full capacity and has overflowed in the past.</p>

		<ol style="list-style-type: none"> 2. Argues that surface water issues have not been addressed, whilst development would cause ‘<i>a major disturbance to the setting of the Listed building</i>’, negative impact on the local amenities and local school and Doctor’s surgery is at capacity. Refers to letter written by then HDC Director of Planning on 27 October 2015. Notes that a larger proportion (90%) of respondents at Regulation 14 opposed to Policy 3. These two sites, combined with the land owned by West Sussex County Council will lead to ‘<i>the rural setting of the area being eroded by the density of development</i>’. The amount of housing being allocated in the Neighbourhood Plan is contrary to paragraph 2.11. The distances of the allocated site are too far away from the services and shops. 3. The sites allocated in the Neighbourhood Plan ‘<i>are the only green rural spaces left in our village</i>’, whilst the village has no village green, and they will also have a damaging effect on wildlife habitat. Argues that the cement works two miles south of the village needs development that would benefit all. Respondent fears that development in Policy 3 will lead to negative traffic impacts. Feels that the Neighbourhood plan consultation (Regulation 14) was not advertised sufficiently. HDC note that the respondent makes points that are in dispute regarding online and offline comments made by the Parish Council and Neighbourhood Planning team. The respondent says that they had no idea ‘of this part of the process’ until being told of it by HDC Officers. 4. Notes minutes from UBNP team, HDC officers and Rydon Homes meeting had to be requested by local residents. The respondent asks if this was ‘<i>a breach of Code of Conduct 2007 which states that PC representatives should be open and honest?</i>’. Policy 3 contradicts the plan’s aim of requiring sites of small development. Mentions that these notices were taken down all bar the one outside their house. 5. Respondent stated that they ‘see no evidence of a non-technical summary’ available at Regulation 16 consultation.
<p>Ref. 23 Historic England</p>	<p>Have comments Policy 6 Policy 7</p>	<ol style="list-style-type: none"> 1. <i>Policy 6 Riverside Caravan Park, Upper Beeding. The site lies directly adjacent to (south of) the Scheduled Ancient Monument of a medieval saltern (a salt refining facility) in Saltings Field. Whilst the Scheduled Ancient Monument represents the extent of know archaeological remains of special interest, along with a five-metre buffer, there is potential for associated remains to be located on surrounding land. As such we would suggest it is appropriate when allocating this land to ensure mitigation of potential impacts to archaeological remains that may be present are carefully integrated into the process of designing proposals. This can be achieved by including a requirement to complete an archaeological investigation prior to submission of proposals for planning consent. We would recommend inserting a bullet point with the following wording:</i> 2. <i>“Proposals for development should be informed by the findings of an archaeological investigation undertaken according to a written scheme of investigation agreed in writing with the Council’s archaeological advisor. The design and layout should take the findings of investigation into account by seeking to preserve remains of archaeological interest ‘in situ’, with the greatest priority given to preserving remains of demonstrable national importance. Where, given the need for</i>

		<p><i>development, the importance of remains does not merit their preservation the compilation of a record of any remains that will be lost will be required as a condition of planning permission.”</i></p> <p>3. <i>This provides a process that reflects the requirements set out in the Framework with regard to the need for decisions affecting potential heritage assets to be informed by an assessment of significance, which in this case may require fieldwork to determine whether any remains are, in fact, present.</i></p> <p>4. <i>We also recommend the replacement of the wording used in relation to the need to record archaeological remains in Policy 7 with this form of words, which reflects the requirement to seek to avoid or minimise conflict between the conservation of heritage assets and any aspect of a proposal set out in the Framework.</i></p>
Ref. 24	Oppose Policies 2, 3, 8	<p>1. <i>‘No infrastructure, it’s a flood plain, there will be noise from the water pumps, the road is not maintained by the council, it’s outside of the built up area of the village’.</i> Suggests that <i>‘No houses built on pound lane site’.</i></p>
Ref. 25	5.1 The vision 7.23 Policy 3	<p>1. Opposes the site allocations in Policy 3 due to concerns regarding traffic impacts and parking capacity within the village. Respondent suggests that ‘1 plot rather than 3 to be built on and a new design to the village road system allowing 2-way traffic in and out of the village’</p>
Ref. 26	Oppose Policies 2, 3	<p>1. Policy 3 allocation site is effected by flooding, has too narrow an entrance to the site, is adjacent to a Listed building and fears the proposed water pumps will cause noise pollution. The respondent suggests removal of Policy 3 and allocation at the former cement works site.</p>
Ref. 27	Opposition Policy 3	<p>1. The respondent describes the plan as allocating ‘wholly unsuitable plots’ whilst also questioning the ‘professional manner’ of the UBNP during the consultation process.</p> <p>2. HDC notes that the respondent’s argument made of how the UBNP conducted themselves before and during consultation.</p> <p>3. The respondent argues that development on Policy 3 site will have negative impact on Listed Building, sewage, drainage, flooding, South Downs National Park, road network, health services and primary school capacities.</p> <p>4. Respondent argues that the housing numbers should be re-considered in line with a ‘post-Brexit’ climate. Doesn’t understand why the Parish Council objected to DC/14/1744 and DC/14/1745 applications but now allocates the same land in its Neighbourhood Plan, especially given aim being to allocate smaller sites.</p> <p>5. HDC notes that the respondent makes points that are in dispute regarding online and offline comments made by the Parish Council and Neighbourhood Planning team. The respondent has attached the following:</p> <ul style="list-style-type: none"> • Photos of flooding provided (no date given. No annotation/detail supplied – please refer to full rep.) • Rydons and flood risk side by side

		<ul style="list-style-type: none"> • Full response which expands up on comments made
Ref. 28	Oppose Policy 3 Policy 11	<ol style="list-style-type: none"> 1. Opposes Policy 3 on the grounds of site access, village infrastructure is insufficient and is situated on flood risk land. 'Policy 11, local green space, specifically, <i>'Pepperscombe Lane, this narrow strip would never be suitable, how is this even in the plan'</i>. Respondent attaches a picture of a flooded lane with no date or name of lane given.
Ref. 29	Oppose 7.23 to 7.31	<ol style="list-style-type: none"> 1. Part 1: <i>'This policy does not reflect the views of the community as per the consultation. Remove the support of development of land East of Pound Lane'</i>. 2. Part 2: <i>Please remove the development proposal for land East of Pound lane as this is a flood risk or needs to be raised which will be detrimental to the landscape and surrounding area.</i>
Ref. 30	Oppose 6.6	<ol style="list-style-type: none"> 1. The chosen allocations 'are wrong' and need to be allocated in better places as the road condition at Pound Lane is poor, being unable to support increase in vehicle movement during and after construction. Primary School is at full capacity.
Ref. 31	Support General	<ol style="list-style-type: none"> 1. <i>'The plan provides a balanced view for all residents and support housing, green spaces, SDNP, transport, the wants of the community, improvements to infrastructure and ideas for the Cement Works'</i>.
Ref. 32	Support with Modifications Policy 2 Policy 3	<ol style="list-style-type: none"> 1. Objects to the allocation of 70 homes in land East of Pound Lane. This on the grounds of difficult parking nearby. Is of the understanding that the Environment Agency objected to recent applications made on the site, noting that <i>'if the houses were elevated enough to prevent flood risk then they were detrimental to the landscape'</i>. 2. It is argued that there is insufficient capacity for infrastructure such as schools and doctors. 3. The respondent suggests that land East of Pound Lane be removed.
Ref. 33	Oppose Policy 3 7.23	<ol style="list-style-type: none"> 1. All three sites in Policy 3 are in Flood Zone 3, a listed Building is adjacent to the site and Doctors and Primary School at full capacity. 2. Understands the need for affordable units and smaller units for elderly, but 'no houses are affordable nowadays' whilst there's no bus route nearby the site, shops are too distant for the elderly too. Sewage system is inadequate. 3. Roads are too narrow with no room to expand them. High Street into both Hyde Lane and Pound Lane is already difficult, adding 70 homes will make the matter worse.
Ref. 34	Oppose Policy 3 7.23	<ol style="list-style-type: none"> 1. All three sites in Policy 3 are in Flood Zone 3, a listed Building is adjacent and Doctors and Primary School at full capacity. 2. Understands the need for affordable units and smaller units for elderly, but 'no houses are affordable nowadays' whilst there's no bus route nearby the site, shop is too distant for the elderly too. Sewage system is inadequate.

		<ol style="list-style-type: none"> 3. Roads are too narrow with no room to expand them. High Street into both Hyde Lane and Pound Lane is already difficult to access, adding 70 homes will make the matter worse. 4. Suggest finding a site where such constraints are not present.
Ref. 35	Oppose Policy 3	<ol style="list-style-type: none"> 1. <i>'oppose both applications due to ruining beautiful countryside and making Pound Lane even worse than it already is due to being very narrow and already having parked cars the entire length'</i> with potential negative traffic impacts. 2. <i>'there must be a better option than building on lovely green fields'</i>.
Ref. 36	Oppose Policy 3	<ol style="list-style-type: none"> 1. Opposes Policy 3 as <i>'it will be taxing not only on the environment but the existing infrastructure - roads, drainage, the school, GP practice'</i>.
Ref. 37	Oppose Policy 2, 3, 8	<ol style="list-style-type: none"> 1. <i>'The sites are unsuitable for development as they flood. The infrastructure can't cope as they are on the outskirts of the village outside of the Built Up Area Boundary and next to the South Downs National Park so should be removed from the Plan. Remove sites from plan'</i>.
Ref. 38	Oppose Policy 2, 3, 8	<ol style="list-style-type: none"> 1. Opposes Policy 3 due to concerns over flooding, which is present during the winter months' and has affected them. 2. The drains have insufficient capacity. Has concerns over traffic impacts on the village. The site will see <i>'be a massive over development of a rural village and will be completely out of character with the rest of the village'</i>. 3. Suggests that the sites in Policy 3 be removed from the plan.
Ref. 39	Oppose Policy 2, 3, 8	<ol style="list-style-type: none"> 1. Opposes Policy 3 due to concerns over flooding, which has caused the respondent's property at the bottom of The Driftway arguing that a new pumping station has caused this. 2. The drains have insufficient capacity and there is a bottleneck at the top of Pound Lane. <i>'Upper Beeding is already struggling to keep up with demand, any further over development will only increase the pressure on the School, doctors etc. Upper Beeding is a village not a Town'. 'If this development is approved I suggest Hyde Lane, Pound Lane and Saltings Road be improved to cater for the hundred's of extra vehicles.'</i> 3. <i>I propose that this development be removed from the plan'</i>.
Ref. 40 Environment Agency	Policy 6 5.4, 5.10, 5.11	<ol style="list-style-type: none"> 1. <i>In our view we would look to Horsham District Council to be satisfied that the Sequential Test has been passed for the site allocations, notably the Riverside Caravan Park. It is not for the Environment Agency to comment on the relative availability of alternative sites. However, there are some comments we would wish to make regarding the process and methodology that has been adopted that you may wish to consider.</i>

		<ol style="list-style-type: none"> 2. <i>Section 5.4 of the report highlights the relationship between the flood risk vulnerability of a development against the flood zone classification. Table 2 has been taken from the Planning Practice Guidance but we would wish to draw your attention to the fact that the key has been amended the “x” should read “development should not be permitted” rather than “development permitted where risks are mitigated and there are wider benefits”. This definition is in effect the Exceptions Test which where an “x” is identified would not be relevant.</i> 3. <i>With regard to the number of sites considered through the Sequential Test I would encourage you to be satisfied that the additional 10 sites that were considered for the SA/SEA process should not also have been considered in the Sequential Test.</i> 4. <i>Section 5.10 discusses the Sequential Test for each of the sites and this is developed further in 5.11 through the sequential approach. The results of these are then presented in Table 4. In reading this table it suggests that none of the sites with areas wholly or partly within flood zones pass the sequential test. If this is the case they should not progress to the Exceptions Test. This may be a presentational error but for clarity and to comply with NPPF and its Practice Guidance should be reconsidered.</i> 5. <i>We would wish Horsham District Council be satisfied that the Sequential Test has been passed, notably for the Riverside Caravan Park which lies wholly in Flood Zone 3. This is in accordance with paragraph 155 of the NPPF.</i> 6. <i>With regard to the specific policies in the Neighbourhood Plan we only have specific comments to make with regard to Policy 6 – Riverside Caravan Park.</i> 7. <i>On the basis that the Sequential Test is satisfied we would wish to see clear policy criteria to show how the remaining flood risk would be managed and mitigated on site. The background evidence to the Neighbourhood Plan is written in such a way that the wider sustainability issues outweigh the flood risk on the site and whilst this may be considered true by yourselves in allocating a site due consideration needs to be given to how the remaining risk is managed and that flood risk would not be increased to third parties.</i> 8. <i>As drafted the policy does identify a number of elements that would need to be addressed – most notably the requirement for a site specific Flood Risk Assessment. We would recommend that the policy doesn’t specify an exact finished floor level but that an appropriate level would be set based on the FRA. This will allow for any changes in modelling or climate change assessments that may occur prior to a planning application coming forward.</i>
Ref. 41	Oppose Policy 3	<ol style="list-style-type: none"> 1. <i>Opposes Policy 3 as this have a negative impact on flooding, traffic and school and doctors surgery at full capacity.</i>
Ref. 42	Oppose Policy 2, 3, 11	<ol style="list-style-type: none"> 1. <i>Opposes Policy 3 as the site is flood plain, unsuitable for development and has narrow access.</i> 2. <i>The respondent notes that in Objective 7 of the plan’s vision aims ‘to protect areas of open space’ and feels that with the site being adjacent to the South Downs National Park it ‘must be preserved’.</i>

		<ol style="list-style-type: none"> 3. <i>'Policy 8 - Design Standards for New Development, this seems to be a complete contradiction in terms namely visual impact, parking, impact on the density of the development in this part of the village, impact on neighbours, drainage and sustainability'.</i> 4. The respondent states that <i>'at no time have I received any information, nor an invitation to make my views known until I became aware that it had already been submitted to HDC'.</i> 5. The respondent is unable to see how Upper Beeding would be able to sustain close to 100 homes and would like to see smaller sites proposed for development.
Ref. 43	Oppose Policy 3	<ol style="list-style-type: none"> 1. Respondent feels that the potential development on land East of Pound Lane will have a negative impact on the rural character of the village and <i>'will be detrimental to the character, landscape and the natural beauty of the park'</i> (South Downs National Park). 2. Hyde Lane will not be adequate enough to accommodate the increased traffic and will likely affect the surrounding villages with the High Street to Bramber being one example. Policy 3 will likely affect infrastructure such as traffic, schools, doctors surgeries, drainage, transport, roads, community facilities and environmental issues. 3. Development on this site will likely set a precedent and possibly reduce the gap between Upper Beeding and Small Dole. 4. <i>'Suggest another area/site be looked at for example the Cement Works at Dacre Gardens'</i> as this has good transport links and won't affect the character of the surrounding villages.
Ref. 44 Henry Adams	Support Policy 3	<ol style="list-style-type: none"> 1. Representation made on behalf of landowner (West Sussex County Council) of southern parcel East of Pound Lane. 2. Site has been allocated in the Upper Beeding Neighbourhood Plan as part of comprehensive development over 3 sites consisting of 70 dwellings allocated under Policy 3. Respondent details site background and description. 3. Respondent notes that the site adjoins the Settlement Policy Boundary whilst Upper Beeding itself is a large village with a large number of service and facilities. Proximity is then given to the following services; Primary School (approx. 350m), Recreation Ground (approx. 400m), Public House (approx. 550m) and Swimming Pool (approx. 500m). 4. Respondent quotes the wording of Policy 3 with West Sussex County Council Highway's authority initial comments on the Smugglers Lane an independent access: <i>'The WSCC owned land at Smugglers Lane has the potential for development with access in principle achievable from Smugglers Lane, which is not a private drive in third party ownership. It may be possible to upgrade and widen the existing lane using land within the control of WSCC to provide an acceptable means of access to a number of dwellings. This would require the completion of an agreement under Section 38 of the Highways Act 1980 and be subject to the completion of the current investigation over the legal status of Smugglers Lane'.</i> 5. Respondent suggests the following changes to paragraph 7 in Policy 3 as they argue a secondary access would additional link to the village and allow for 'effective master planning' which could see a comprehensive development on all 3 sites:

		<p><i>'a secondary access off Smugglers Lane is supported providing it is necessary and will not prejudice the comprehensive development of the site in its entirety'.</i></p> <p>6. The respondent further states: <i>'As referred to in our previous submissions, a means of access via Smugglers Lane will ensure both physical and visual connectivity between the site and existing Settlement Boundary'.</i></p> <p>7. <i>'An access at Smugglers Lane would assist with the wording and aims of the Parish that have been included in Policy 8. This wording is as follows, <u>'enhanced pedestrian and new cycle links from the site to Upper Beeding village centre are to be provided to improve connectivity from the site to the wider village'</u>. The access at Smugglers Lane would provide an access straight into the village centre, rather than pedestrians walking to the settlement via Pound Lane'.</i></p> <p>8. Respondent states that the landowner is in agreement with the comprehensive scheme being landscape led and Policy 8 of the Neighbourhood Plan.</p> <p>9. <i>'The National Planning Policy Framework was revised and adopted in February 2019 and sets out the policies that should be relied upon in decision making. The most relevant policies of the NPPF are the following'.</i> The respondent quotes NPPF 2019 paragraphs 11 (a) (b), 13 and 29. The respondent then quotes the basic conditions as set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>10. <i>'In our view, the draft Neighbourhood Plan has been positively prepared, in accordance with the relevant guidance. It is felt that the proposals would not result in harm to the historic environment and would preserve the wider landscape of the South Downs National Park. Subject to the recommended changes to policy wording and an appropriate landscape led approach, we consider that the draft Plan would contribute to the achievement of sustainable development. It is, therefore, our opinion that the Upper Beeding Neighbourhood Plan can be considered Sound, subject to the amendments proposed above'.</i></p> <p>11. The respondent then concludes: <i>'The landowners are supportive of development on the site and it is readily available for development. In our view, the site is capable of being developed independently or as part of a wider scheme. They are supportive of the allocation in principle, together with the requirement for the site to be subject to a masterplan. Subject to the amendments sought to Policy wording, on behalf of clients we support the draft Neighbourhood Plan'.</i></p>
Ref. 45	Oppose Policy 3	<p>1. The respondent raises concerns over the impacts which a housing allocation on Land East of Pound Lane could have on Hyde Lane, Pound Lane, school, the Doctors surgery and infrastructure and sewage system capacity.</p> <p>2. Land East of Pound Lane used to be part of the Area of Outstanding Natural Beauty before the designation of the South Downs National Park, this should be re-designated. Argues that the site would be 'intrusion into the countryside'. Large variety of birds live in the Brooks. The setting of the Grade II Listed Building on Pound Lane 'should be respected'. Site sees a lot of flooding, which affects the respondent's garden. View from SDNP across the Adur Valley to Chanctonbury Ring needs to be protected and also the SDNP is a 'Dark Skies' designation.</p>

<p>Ref. 46 South Downs National Park Authority</p>	<p>General Comments</p> <p>Vision and Objectives 6.1, 6.10, 7.22, Policies 3, 5, 7, 8, 10</p>	<ol style="list-style-type: none"> 1. The respondent states that the neighbourhood plan needs to ensure that it does not conflict with the emerging South Downs National Park Authority Local Plan. 2. <i>'The SDLP has been through Examination and was out for consultation on Main Modifications from 1st February to 28th March 2019. This is the final stage of the SDLP process before adoption. In response to our previous comments, relevant SDLP policies have been listed in section 3. The three SDLP core policies provide the overarching framework for evaluating all development proposals in the National Park, therefore SD2 Ecosystem Services and SD3 Major Development should be added to the list of relevant policies.'</i> 3. The respondent suggests removing reference to landscape in Vision and Objectives, as there are 7 special qualities within the SDNP, which are equal in importance. 4. <i>'Upper Beeding and Small Dole will have retained their own distinctive characters and they will have worked successfully with the South Downs National Park Authority (SDNPA) and West Sussex County Council (WSCC) to; protect the special qualities of the South Downs National Park landscape.'</i> 5. <i>'The third aim largely repeats the second one, we therefore suggest this is deleted. In terms of the sixth aim: (Develop a green infrastructure plan that improves recreation and leisure opportunities within the National Park for the community), there is also potential to improve connections from the Parish to the South Downs Way and the South Downs Link.'</i> The respondent makes the following recommendation: 6. Delete third issue: Maintaining the parish's natural landscape. We recommend that the sixth aim in this section is reworded to say: <u>'Develop a green infrastructure plan that improves recreation and leisure opportunities within the National Park for the community and provides better connections from the Parish to the South Downs Way and South Downs Link'</u>. 7. Paragraph 6.10 - As commented elsewhere, policies of the SDLP are also relevant and should be referred to here. Include reference to SDLP policies: "For all other planning matters, the national and local policies of planning documents – the National Planning Policy Framework and the policies of the Horsham Planning Framework and South Downs Local Plan are to be referred to." 8. Paragraph 7.22 – Respondent Welcomes reference made by the plan to the Shoreham Cement Works Area Action Plan. 9. Policy 3 – The respondent welcomes landscape led master plan for the site and criteria 1 (a)-(d). <i>'However, we'd like to emphasise the potential impact of the roofscape and wish to see direct reference to this in the policy. We also consider the policy could be more effective in highlighting opportunities to improve Green Infrastructure (GI) and recommend criteria 11 makes specific reference to GI. New and additional GI should also be characteristic of the landscape character area'</i>. 10. <i>We wish to reinforce the following points and recommend the inclusion of the additional following wording detail in the policy.</i> <ol style="list-style-type: none"> A. <i>1 (b) Regard should be given to visibility and key views, especially from the SDNP which should inform the earliest stages of design and layout. <u>The roofscape will be a significant aspect of this assessment and how it will appear in these views.</u></i>
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		<p>17. We recommend the following additional wording is included within the policy criteria:</p> <p>A. 2. <u>The development design and landscaping positively respond to the identified landscape, cultural and visual sensitivities of the SDNP does not adversely affect the landscape character of the South Downs National Park or have a detrimental visual impact on the National Park.</u></p> <p>18. We note the following typos in paragraph 7.56: “The landscaping should be designed in partnership with the new built from form to deliver a useable space which provides safe, interesting space for residents to leave lead fulfilling lives.”</p> <p>19. Policy 8 – ‘We welcome and support the revisions made to this policy in response to our comments made during the pre-submission consultation. Further amendments are sought in line with SDLP Policy SD5 and SD48’.</p> <p><u>Amendment: Within the SDNP or its setting...development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive design that makes a positive contribution to the overall character and appearance of the area.</u></p> <p><u>Add: Within the SDNP development proposals should meet minimum sustainability credentials, as set out below</u></p> <p>a) At least 19% reduction in CO2 emissions relative to building regulations baseline via energy efficiency of the built fabric.</p> <p>b) At least 20% reduction in CO2 emissions relative to building regulations baseline via low/zero carbon energy on site, eg. PV.</p> <p>c) No more than 105 litres/person/day predicted internal mains water consumption.</p> <p>20. Policy 10 – ‘The Courtyard and Beeding Court employment sites referenced in the policy are located within the SDNP. This policy therefore needs to reflect the wording of the strategic employment policy (SD35 Employment Land) in the SDLP as it may have the potential to conflict with this otherwise.</p> <p>21. <u>Proposals that result in the loss of an existing employment site will only be permitted where it is demonstrated that its continued use is no longer viable, demonstrated by a robust marketing campaign of at least 12 months; unless the site relates to a site specific policy within the Neighbourhood Plan’.</u></p>
<p>Ref. 47 Natural England</p>	<p>General Comments Policies 1, 3, 4, 5, 6, 7, 8, 9, 10, 11 Community aspirations Functionally linked land</p>	<p>1. <u>Policy 1 – Supporting development within the built up area boundary reduces the impacts on SDNPA and green belt with the village. Resisting proposals which adversely affect the qualities of SDNP and ‘areas of valued open space and local green space contributes to protecting the important areas of biodiversity and the existing ecological networks of Upper Beeding’.</u> The respondent argues that ‘Resistance to proposals should also be stated to include proposals which may adversely affect designated sites chiefly; Beeding Hill to Newtimber Hill SSSI, Horton Clay Pit SSSI and Adur Estuary SSSI – which while not within parish boundary is a short distance downstream from the Adur River and so can be impacted by development within Upper Beeding’.</p> <p>Evidence: <u>Conserving and enhancing the beauty of landscapes in National Parks is in line with both the NPPF (172.) and the DEFRA 25 year plan (Chapter 2.) Protecting the greenbelt from unsuitable development is a key focus of the NPPF (Section</u></p>

<p>Biodiversity net gain</p>	<p>13.) <i>Incorporating, protecting and enhancing ecological networks is in line with the NPPF (170. & 174.). Protecting and enhancing designated sites is in line with the aims of the NPPF (171. & 174.).</i></p> <p>2. Policy 2 – no comment is given.</p> <p>3. Policy 3 – <i>‘The requirement of point 1.b) limits the potential negative impacts of inappropriate development on the setting of the SDNP. The requirement of point 1.d) helps protect the SDNP and can also contribute to achieving biodiversity net gain and enhances the existing ecological network. The requirement of point 8. can reduce the amounts of private vehicular usage which in turn can: improve air quality, reduce emissions and lessen a cause of climate change. The requirement of point 9. limits the negative ecological impacts of the development. The respondent also supports the provision of Sustainable Drainage (SuDs) before stating that ‘proposals should be required to achieve a biodiversity net gain and enhance the existing ecological network’.</i> Support to arguments made mentions DEFRA 25 year plan and NPPF paragraphs 20, 91, 150, 171 & 181 in relation to Incorporating, protecting and enhancing Green Infrastructure NPPF paragraphs 170 & 174 in relation to Incorporating, protecting and enhancing ecological networks, NPPF paragraphs 8, 170, 174 & 175 for minimising impacts on biodiversity and providing biodiversity net gains and NPPF paragraphs 170 & 171 for incorporating and contributing to natural capital.</p> <p><i>“9. A full ecological and biodiversity survey of the site is submitted as part of the application. <u>Any reasonable mitigation and potential enhancements proposed by the surveys must be implemented in full</u>”.</i></p> <p>4. Policy 4 – Respondent argues that criteria 4 and 7 will help limit the negative impacts on SDNP and Horton Clay SSSI whilst helping improving air quality. <i>‘The full ecological and biodiversity survey should be used to focus environmental mitigation and enhancement measures’.</i> Proposals should see a ‘net gain in biodiversity’, enhance neighbouring ecology networks and <i>‘be encouraged if feasible to incorporate natural capital/ ecosystem services and achieve net gains in these 3 concepts’.</i> Again, support of the arguments made mentions DEFRA 25 year plan and NPPF paragraphs 8, 20, 91, 148, 150, 170, 172, 174, 175 and 181. The following suggested wording is made to criteria 3 and 6:</p> <p><i>“3. A full ecological and biodiversity written survey of the site is required to be submitted as part of a formal planning application. <u>Any reasonable mitigation and potential enhancements proposed by the surveys must be implemented in full</u>”</i></p> <p><i>“6. The pond within the site to be retained and incorporated within the scheme as to enhance its ecological value.”</i></p> <p>5. Policy 5 – Responded argues that criteria 2, 5 and 9 can limit negative impacts on the setting of the SDNP. Criterion 7 could result in limiting negative impacts on the environment and see a net gain in biodiversity with enhance in the existing ecological network. The respondent states that proposals should see full ecological and biodiversity survey for environmental mitigation and enhancements. Proposals should see a ‘net gain in biodiversity’, enhance neighbouring ecology networks and <i>‘encouraged and supported to incorporate GI into this development. Proposals should also be encouraged if feasible to incorporate natural capital/ ecosystem services and achieve net gains in these 3 concepts’.</i> In support of the arguments made mentions DEFRA 25 year plan and NPPF paragraphs 8, 20, 91, 148, 150, 170, 172, 174, 175 and 181. The following suggested wording is made to criteria 7:</p>
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		<p><i>'7. A full ecological and biodiversity survey and written report of the site may be required to be submitted with a planning application. <u>Any reasonable mitigation and potential enhancements proposed by the surveys should be implemented in full</u>'</i></p> <p>6. Policy 6 – Criteria 7 can limit impacts of development on the SDNP. Criteria 10 can limit the impacts of development on wider existing ecological network. Criterion 13 can limit negative ecological impacts of development and could result in biodiversity net gain. Suggest that criterion 10 is strengthened to enable biodiversity net gain, whilst criterion 13 <i>'should encourage and support the use of SUDS surface water drainage'</i>. With proposals being encouraged and supported to incorporate Green Infrastructure into the development. Again, support of the arguments made mentions DEFRA 25 year plan and NPPF paragraphs 8, 20, 91, 148, 150, 170, 172, 174, 175 and 181</p> <p><i>"10. Design and layout of the development shall ensure the ecological and landscape value of the River Adur Water Meadows and Wyckham Wood Local Wildlife Site is <u>protected and enhanced</u>. not detrimentally harmed."</i></p> <p><i>"11. A full ecological and biodiversity survey and written report of the site will be required to be submitted with a planning application. <u>Any reasonable mitigation and potential enhancements proposed by the surveys should be implemented in full</u>"</i></p> <p><i>"13. A drainage strategy detailing the proposed means of foul and surface water disposal must be submitted with a planning application <u>strategies should seek to incorporate SuDs</u>"</i></p> <p>7. Policy 7 – Criteria 2, 3 and 6 can limit development impact on the setting of the SDNP. Criterion 3 encourages Green Infrastructure incorporation which could result in positive ecological impacts and biodiversity net gain. Criterion 7 can limit negative environmental impacts. Alteration of criterion 3 could include net gain terminology. Again, support of the arguments made mentions DEFRA 25 year plan and NPPF paragraphs 8, 20, 91, 148, 150, 170, 172, 174, 175 and 181.</p> <p><i>"3. A landscaping scheme is to be submitted with the planning application. The landscaping and GI proposals for the site will need to provide a positive new edge of settlement at this location <u>that achieves biodiversity net gains</u>."</i></p> <p><i>"7. A full ecological and biodiversity survey of the site is required and a written report to be submitted with a planning application. <u>Any reasonable mitigation and potential enhancements proposed by the surveys should be implemented in full</u>.</i></p> <p>8. Policy 8 – Respondent argues that requiring all development having a landscape led approach will help limit any potentially harmful impact on the SDNP. The protection of trees/hedges could help limit impacts on the existing ecological network. Proposals are encouraged to enhance SDNP landscape, protection of trees/hedges, drainage achieved through SuDs, biodiversity net gain, enhancement of biodiversity net gain and consideration of designated sites including Beeding Hill, Newtimber Hill SSSI, Horton Clay SSSI and Adur Estuary SSSI. Again, support of the arguments made mentions DEFRA 25 year plan and NPPF paragraphs 8, 20, 91, 148, 150, 170, 172, 174, 175 and 181</p> <p><i>"Within the South Downs National Park or its setting, proposals must adopt a landscape led approach <u>and conserve, and enhance where feasible, its landscape character, and natural beauty and tranquillity</u>. In the areas adjoining the South</i></p>
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		<p><i>Downs National Park, proposals must avoid any significant detrimental effect on its landscape, <u>and natural beauty and tranquillity.</u></i></p> <p>9. Policy 9 - <i>'This policy should specifically encourage improvement of community facilities using GI as they are ideal areas to implement GI'. 'Incorporating, protecting and enhancing GI is in line with the NPPF (20. 91. 150. 171. & 181.) and the DEFRA 25 year plan (chapter 3 section 3.i).'</i></p> <p>10. Policy 10 - <i>Ensuring proposals to expand employment sites consider the landscape and the SDNP helps limit the potential impact proposals could have on the SDNP. Conserving and enhancing the beauty of landscapes in National Parks is in line with both the NPPF (172.) and the DEFRA 25 year plan (Chapter 2.)</i></p> <p>11. Policy 11 – <i>'Having numerous local green spaces designated within Upper Beeding is very beneficial to the wider ecological network of the parish as they are important natural and semi-natural areas that engage the public and distribute the benefits of GI'.</i></p> <p>12. Community aspirations – <i>'Many of the community aspirations are in line with aims to increase the amount and quality of GI within Upper Beeding and could even result in biodiversity net gains if implemented well, we support aspirations like these'.</i></p> <p>13. Functionally linked land – <i>'We would make note birds for which Arun Valley Special Protection Area and Ramsar site are designated, utilise land within, and also around, these sites. Where birds regularly forage on land outside the designated site, this land may be considered functionally linked to the SPA/Ramsar by providing supporting habitat. Due to their locations the allocations surrounding Upper Beeding village, chiefly the allocation east of pound land, could potentially be considered functionally linked land for the non-breeding/wintering birds, which are interest features Arun Valley SPA and Ramsar site. Proposals at these locations may therefore require further assessment to determine with certainty that the existing application site serves as functionally linked land, and possibly appropriate impact mitigation/avoidance measures'.</i></p> <p>14. Biodiversity net gain – <i>The respondent strongly advise the Neighbourhood Plan 'specific policy focused around delivering biodiversity net gain in Upper Beeding. Such a policy should make it a requirement of every development within Lenham to result in an overall increase in biodiversity'. While this policy should be tailored to suit the specific demands and habitats of Upper Beeding Natural England would offer the following advice regarding its implementation:</i></p> <ul style="list-style-type: none"> • <i>Net gain requirements should be quantifiable and measureable, to this end we recommend employing a biodiversity metric such as the DEFRA biodiversity metric highlighted in Annex A</i> • <i>Net gain policy cannot be applied to irreplaceable habitats or species such as ancient woodlands</i> • <i>Net gain delivery should be proportionate and related to the species or habitats impacted by the proposed development</i> • <i>The delivery of net gain should be tailored to enhance the ecological networks that were present at the site of development, if this is not possible net gain delivery may be considered off site however it should still be proportionate and relevant to the species or habitats impacted by the development.</i>
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<p>Ref. 48 High Ways England</p>	<p>General Comments</p>	<ol style="list-style-type: none"> 1. <i>'The SRN (Strategic Road Network) does not pass through the parish of Upper Beeding, with the A27 lying to the south and the A23 to the east of the parish. The 2015 Horsham District Planning Framework identifies that at least 1,500 dwellings should be delivered throughout the district via neighbourhood plans but does not give a specific allocation of additional housing for Upper Beeding parish.</i> 2. <i>The AECOM Housing Needs Assessment (2017) estimated the quantum of housing need in the parish based on 4 sources. Based upon the average of the four projections, the Upper Beeding Neighbourhood Plan Consultation (Regulation 16) identifies that 213 dwellings should be delivered in the parish to 2031. We note that targets projected by the various sources ranged from 62 to 351 dwellings over the Plan period.</i> 3. <i>Based on the 213 (and up to 351) dwellings proposed, this amount of development is likely to have an impact on the operation of the junction of the A27 and A283 and may potentially worsen the existing queuing on the A27 Shoreham bypass flyover slips because of existing congestion in the peak periods at the Sussex Pad junction. As such, there are expected to be knock on effects on the Local and Strategic Road Networks.</i> 4. <i>In order to understand the potential impact upon the SRN, we will need to see an assessment of the cumulative traffic generation and distribution to and from the SRN, and impact upon junction operation. The assessment should include a sensitivity test of the higher estimate of housing requirement for the parish (351 dwellings). In this respect, we strongly advise that the development is included within the Horsham Transport Study that Horsham District Council is currently undertaking in order to understand the impact on the SRN, while any applications will need to be supported by a robust Transport Assessment.</i> 5. <i>In the absence of this information, Highways England is unable to advise that the Upper Beeding Neighbourhood Plan 2018 – 2031 is sound in its current format due to its potential to cause severe harm on the safe and efficient operation of the highway network. We provide our continued commitment to work with the Parish Council to resolve the above matters of concern to enable successful delivery of the Neighbourhood Plan. Please do contact us to discuss how to move forward on this assessment'.</i>

<p>Ref. 49 West Sussex County Council</p>	<p>General comments 7.24 Policy 6 Appendix F</p>	<ol style="list-style-type: none"> 1. <i>'Given that the submitted UBNP includes the proposed allocation of small-scale housing, 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.</i> 2. <i>Para 7.24 - Reference is made to the adoption of Pound Lane as public maintained highway. For information, WSCC cannot insist upon such a requirement; it is for the respective land owner to offer the land for adoption. Such a requirement is not in any case included within the suggested policy.</i> 3. <i>Policy 6, Point 9 – Whilst the suggestion for the works to be agreed with WSCC prior to the application being submitted via pre application discussion is welcomed, this cannot be required. Any improvements should be covered within the planning application. As such, it is recommended that the last two sentences of Point 9 are changed to read 'It is likely that improvements to Riverside will be needed; any improvements are to be agreed with the County Council'</i> 4. <i>Appendix F, p120 - the aspirations to provide cycle links between Upper Beeding and Small Dole, also St Peter's Church and Steyning, could extend to consider horse riders also. Such routes would connect equestrian communities and so enhance the local rural economy as well as encouraging horse riders from using the local road network. The aspiration to improve the footpaths and bridleways, could also be funded from future CIL monies'.</i>
<p>Ref. 50 DMH Stallard</p>	<p>Support Policy 10</p>	<ol style="list-style-type: none"> 1. <i>DMH Stallard act on behalf of Hopegar Properties on planning matters in relation to the Mackley Industrial Estate site (Small Dole). The representation makes specific comments on Policy 10 – Employment Sites and Supporting Businesses which advises that loss of existing employment will only be permitted where it can demonstrated that the use is no longer viable, whilst proposed expansion of these sites will be supported, subject to criteria being met.</i> 2. <i>'objective 4 states that the seeks to secure the future of the existing employment uses within the parish and plan for their growth to serve and support the local economy. We wholeheartedly agree with the objective'.</i> 3. <i>The respondent notes that the 'Local Economy Focus Group Report' states one of the objectives is to improve and introduce opportunities for businesses to grow. It was also noted that existing industrial estates in the parish have future potential growth, however, most estates see opportunities exhausted or limited.</i> 4. <i>'We fully support the contents of Policy 10 and wholly support the identification of Mackleys Business Park as an employment site. Mackleys Industrial Estate is located at the southern end of the settlement of Small Dole and is approximately 9.5 hectares in area. It is a large Estate which provides a significant employment offer in the Parish'.</i> 5. <i>It is noted in paragraph 7.75 there are land constraints which sees the plan not allocate land for employment use, aiming to maintain existing sites and mention Henfield Neighbourhood Plan intend to allocate new employment land, which is commutable.</i> 6. <i>Whilst we understand this approach, it should be noted that by including the area of the south of the Mackley Industrial Estate an area approximately 1.1 hectares of land has been made available and allocated for employment space. This area was not previously included in the draft version (Reg 14) of the Neighbourhood Plan, and by including this area in the</i>

		<p><i>submission version (Reg 16) of the Plan, the Parish will have helped to make a significant contribution to address the continued need for commercial space in the Parish and the District. We consider that the Neighbourhood Plan should make reference to this point.</i></p> <p>7. <i>In summary, we fully support the submission version of the Neighbourhood Plan and the identification of Mackleys Industrial Estate as an employment site. However, for clarity, consistency and for the reasons set out above, it is considered that the built up area boundary of Small Dole as shown on the Map be amended to ensure that the area of land to the south be included’.</i></p>
<p>Ref. 51 DMH Stallard</p>	<p>Support Policy 4</p>	<ol style="list-style-type: none"> 1. The representation has specific comments on Policy 4 which allocates 20 houses on Land at Southern end of Oxcroft Farm, the respondent ‘wholly supports’ the policy. The respondent notes that the AECOM Site Assessment suggested a yield range of 20-52 dwellings, however, Small Dole sits within two Parishes (Upper Beeding and Henfield) which both have a Neighbourhood Plan and do not wish to over allocate Small Dole. Whilst the respondent agrees with this approach, it is concerned that Henfield Neighbourhood Plan may not allocate any sites at all and query whether it would be sensible to have a mechanism that provides more than 20 homes. The respondent has noted that two sites have been put forward two Henfield Neighbourhood plan, with one site being previously refused with great local objection and the other being deemed to be ‘land locked’. 2. The respondent notes that Policy 4 does not have specific policy regarding affordable housing, instead referring this to Policy 16 of the HDPF, criteria 3 (a) and (b) is quoted. Whilst the respondent commends this, they argue that this level of affordable housing may leave many potential housing sites being unviable, with HDPF Policy 16 acknowledging that criteria 3 (a) and (b) are ‘targets’. The respondent suggests: <i>‘It is our view therefore that the affordable housing requirement referenced within the Draft Neighbourhood Plan should be considered a target, and there should be an acknowledgement within the Plan of this, and also that where viability is an issue, a lower level of affordable housing may be necessary and will be acceptable’.</i> 3. Attached to representation is a report on potential access, the ‘report concludes that there are 3 possible access points to the site, 2 of which would be directly from Henfield Road’. WSCC have confirmed to the respondent that access from Henfield Road would be the best solution. 4. The respondent notes that Policy 4 sees a requirement for full ecological and biodiversity written survey. With this already being covered by local and national validation requirements, the respondents queries the need for this within policy 4. 5. Respondent notes that the Policy requires a strong landscape buffer to provide a defensible boundary to development, stating where possible existing boundaries should be retained. The respondent argues that Criteria 2 could be in conflict with this objective (Access is to be from the Henfield Road). This part of the policy requires a landscaping scheme to be submitted, the respondent sees this part of local validation already. <i>‘As such it is our view that this part of policy 4 is unnecessary as this requirement will be met through local validation of the planning application’.</i>

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| | | <ol style="list-style-type: none"> 6. <i>'The policy requires that the development be designed so as not to unacceptably harm the amenity and privacy of occupiers of properties along Henfield Road..... However, we would query whether this criterion of the policy is necessary given that this is something that would be duly considered and given significant weight by the case officer as part of their assessment of the planning application'.</i> 7. Respondent seeks clarification on why retention of the existing pond is deemed to be necessary. 8. The respondent describes the current criteria 7 which requires the pedestrian access to the nearby bus stop as 'onerous' and sees potential challenges related to land ownership. <i>'We are concerned that the need for the requirement to improve pedestrian access by connecting the site to existing bus stops would be beyond the scope and control of the landowner. We would suggest therefore that the wording of this part of the policy be amended in a way which would require that the development seeks to secure improved accessibility to bus stops'.</i> 9. Criterion 8 which covers Land contamination is questioned, given the site is currently agricultural use and that a land contamination assessment is already a local requirement for the validation list. <i>'As such it is our view that point 8 of policy 4 is unnecessary as this requirement will be met through local validation of the planning application by Horsham District Council'.</i> 10. For quantum of development it is argued that <i>'The site allocation is subject to a number of requirements as set out within the site allocation policy, which we believe may have an impact on the ability of the site to provide the quantum of development proposed'.</i> The respondent repeats the criteria in Policy 4. Whilst the allocated area covers 1.3 hectares, the respondent argues that less than half of the site could be developed due to retention of existing buildings and pond. Further noting <i>'significant amount of land around the edges of the site may be required to provide the required strong landscape buffers along the boundaries of this site'.</i> 11. In Light of this, the respondent had attached to two layouts for the site. One with 20 dwellings with the retention of farm buildings which is described as 'quite cramped'. The second layout sees 30 units with the farm buildings located elsewhere. The respondent argues that the allocation of 20 units does not make the best use of the site. 12. <i>'This exercise has highlighted that in order to provide the desired quantum of development and comply with the policy requirements, the site allocation may need to propose around 30 units. This would be the case particularly if the layout were to be somewhat more spacious and therefore, better reflect the semi-rural / edge of settlement location. As such we consider that it may be suitable for the Examiner to consider allowing the site allocation to be flexible in order to allow for a scheme of up to 30 units on site. We would be very happy to discuss this matter further with the Examiner during the subsequent examination'.</i> 13. There is no clarification as to whether the existing farm buildings on site will need to be relocated, whilst noting that the erection of agricultural building was accepted in principle on the site. However, this could potentially be problematic as there is no area show on the site allocation as to where the farm buildings could be relocated to. |
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		<p>14. <i>'As such, we are of the view that in the event that relocation of the farm buildings is required some sort of link / agreed mechanism should be in place in order to ensure that the relocation of the farm buildings on another part of the land can be approved as it will be an integral part of the allocation of this site. We have attached a site plan which indicates the other land in the ownership of the Trustees on which the farm buildings could potentially be located (appendix c). We would suggest that an asterix could be included on the policy map with an annotation indicating that the existing farm buildings are to be located in this area'.</i></p> <p>15. Attached to the representation is:</p> <ul style="list-style-type: none"> • Highway Access Report • Pictures of site layouts for 20 units and 30 units • Picture of site boundary with current uses with allocated part of site
Ref. 52	Oppose Policy 2, 3, 11	<p>1. Opposes Policy 3 due to flooding which they have witnessed first-hand for the past 34 years and has insufficient drainage. The site is only served by one road with construction traffic will impact current infrastructure. Roads are already dangerous for school children and elderly. There will be negative visual impacts. The respondent suggest land south of Shoreham Road, which has no flooding and affordable first time buyers homes.</p>
Ref. 53	Oppose Policy 3 7.23, - 7.31	<p>1. Opposes Policy 3 as secondary access will not mitigate traffic sufficiently. Current road capacity has been reached with high traffic levels and very limited parkin. Increased traffic will be a danger to local primary school children contradicting 5.1 'providing safe routes to schools'. Criterion 8 of policy 3 is 'ill considered' as there insufficient room for cycle lane.</p> <p>2. Policy 3 would result in 'over development' and site sees flooding.</p> <p>3. Suggests nearby cements for development.</p>
Ref. 54	Oppose Policy 3 7.23, - 7.31	<p>1. Opposes in Policy 3 as secondary access will not mitigate traffic sufficiently.</p> <p>2. Current road capacity has been reached with high traffic levels and very limited parkin. Increased traffic will be a danger to local primary school children contradicting 5.1 'providing safe routes to schools'. Criterion 8 of policy 3 is 'ill considered' as there insufficient room for cycle lane. Proposed developed on site would be 'over development' and site sees flooding.</p> <p>3. Suggests nearby cements for development.</p>
Ref. 55	Oppose Policy 3 7.23	<p>1. Opposes Policy 3. <i>'Our most recent comments were submitted to HDC Planning Department 18 November 2018 and our views remain unchanged. Please see attached files below...'</i>. Attached is representation made on DC/18/2318.</p>

Ref 56	Support	<ol style="list-style-type: none">1. Development proposed within the plan is appropriate and is in general conformity with the development plan and national policy.2. The plan has been positively prepared and is committed to a further review once the district council has completed its review of its HDPF.3. Support is given to the designation of Local Green Space providing each proposal meets the test as stipulated in the NPPF.4. Consideration is made to the possible extension of the referendum area to include parts of Small Dole which reside in Henfield Parish.
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