



Examination Statement

Land at Glayde Farm, Lower Beeding

Prepared on behalf of Elivia Homes Eastern
(Representor Number 1198075)

Horsham District Council Local Plan
Examination in Public

Matter 9: Sites Allocated for Development in the Plan

Date of Hearing Statement: 22nd November 2024
Date of Hearing Session: 21st January 2025

Examination Statement – Horsham District Local Plan

Elivia Homes Eastern, Site: Land at Glayde Farm, Lower Beeding



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1. Introduction

- 1.1. This Examination Statement has been prepared by Savills on behalf of Elivia Homes Eastern (hereafter 'Elivia Homes').
- 1.2. This Statement relates the Land at Glayde Farm (hereafter 'the Site') which is located in Lower Beeding and has been draft allocated for 30 units in the Horsham District Local Plan 2023-2040 (HDLP). The Site is also subject to a detailed planning application which was submitted on 8th November 2024. The proposed development is for:

“Full planning application for the development of 32 no. residential units including appearance, landscaping, layout, scale and access with associated open space, earthworks, drainage and all other associated infrastructure.”
- 1.3. Prior to the submission of the HDLP to the Planning Inspectorate for Examination, Elivia Homes has participated in the formal consultation of the Local Plan at Regulation 18 (R18) (April - May 2018) and Regulation 19 (R19) stages (January - March 2024). The representor number is 1198075.
- 1.4. The location of the Site, its surroundings and the development vision have been set out in detail at the R18 and R19 stages (paragraphs 2.1 – 2.18), see Appendix B, and have therefore not been reproduced in detail in this Statement.
- 1.5. For the avoidance of doubt, any policies referred to within this Statement relate to the emerging Local Plan unless otherwise stated.

2. Response to the Inspectors Questions

Matter 9 – Sites Allocated for Development in the Plan

Issue 2 – Whether the other sites (settlement site allocations) allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

Q7 - Is Strategic Policy HA11: Lower Beeding Housing Allocations sound?

a) LWB1?

2.1. Paragraph 35 of the National Planning Policy Framework (NPPF) (2023) outlines that Plans are found to be 'sound' if they are:

“a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

2.2. Draft Policy HA11 allocates the Site for 30 dwellings with a site area of 2.7 ha. HDC’s Site Assessment Report (December 2023) justifies that the two southern parcels of draft allocation LWB1 are deliverable for 30 dwellings, which comprises the 2.7 ha of land referenced. However, the Policies Map is currently incorrect and shows an area of 4.6 ha. The Policies Map therefore needs to be updated to remove the most northern parcel of the allocation site.

2.3. A full planning application was submitted on 8th November for the proposed development of 32 dwellings on the two southern parcels of the Site. The application (Ref: DC/24/1763) has been received by HDC and



will be validated imminently. The evidence submitted as part of application Ref: DC/24/1763 justifies the proposed development of the southern two parcels at a density of 20 dwellings per hectare (dph) (see proposed layout at Appendix C). Paragraph 123 of the NPPF and draft Policy 20 of the HDLP highlight the importance of making efficient use of land in meeting housing needs. Therefore, the deliverability of at least 30 dwellings on the southern two fields has been justified.

ACTION REQUIRED: Remove the most northern parcel of site LWB1 from the Policies Map to show the correct site area of 2.7 ha. This is required to ensure the policy is effective.

Q7 - Is Strategic Policy HA11: Lower Beeding Housing Allocations sound?

d) Is criterion 2 a) effective? Are criteria 2 b) and c) consistent with national policy?

Criterion 2a

- 2.4. Criterion 2a states that development will be supported where proposals comply with any policies, including site-specific policies, in a Made Lower Beeding Neighbourhood Plan (LBNP). This policy is currently not effective since the emerging LBNP conflicts with the emerging HDLP.
- 2.5. The Site is part allocated for 14 dwellings in the emerging LBNP. The LBNP was Examined in 2021 but is still awaiting referendum due to concerns raised by Natural England regarding water usage in the Sussex North Water Resource Zone (SNWRZ). A focused consultation took place between 2nd September 2024 to 14th October 2024 requesting comments on the updated policies and evidence relating to water neutrality. When the strategic solution to water neutrality is implemented, the Council will proceed to take the LBNP to referendum and, upon a successful result, the Council will 'make' the Plan at Full Council at the earliest opportunity. Lower Beeding Parish Council currently aims to go to referendum on the emerging Neighbourhood Plan in January 2025.
- 2.6. Currently the draft allocation in the LBNP conflicts with the draft allocation in the HDLP, since 2.7 ha of the Site is allocated for 14 dwellings in the former and 30 dwellings in the latter. HDC's evidence base and Elivia Homes' live planning application has clearly demonstrated that the 2.7 ha of the Site can sustainably deliver at least 30 dwellings. The wording of Policy HA11 therefore needs to be updated to clarify how policies in the LBNP and the HDLP will interrelate.

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2.7. Paragraph 29 of the NPPF states that:

‘Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.’

2.8. The NPPF defines strategic policies as:

‘Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.’

2.9. Therefore, since the LBNP promotes less development than set out in draft Policy HA11, the LBNP is not consistent with national policy. This conflict will inevitably cause confusion during the determination of any planning applications if both the LBNP and the HDLP are adopted in their current format. To ensure that draft Policy HA11 is effective, additional text should be added to the policy outlining that in accordance with the NPPF, the site allocations made in the HDLP will take precedent over any conflict which arises from the emerging LBNP.

ACTION REQUIRED: Update the wording of Policy HA11 to clarify how the HDLP will interrelate with any made Neighbourhood Plans.

BOX 1: Proposed Policy Amendment

Strategic Policy HA11 (Lower Beeding Housing Allocations)

2. In addition to meeting national and Local Plan requirements, development will be supported where proposals:

a) Comply with any policies, including site-specific policies, in a Made Lower Beeding Neighbourhood Plan. **Where there is conflict with a non-strategic policy in a Made Neighbourhood Plan which was Examined prior to the adoption of the HDLP, the strategic policy will take precedence in these instances.**

Criterion 2b

2.10. Criterion 2b of Policy HA11 states that development will be supported where proposals:

“Protect and enhance the setting of the Grade II listed Holy Trinity church. In the case of LWB1, development should be focussed to the southern part of the site with appropriate landscape mitigation to be implemented

on the northern half of the site to aid a transition to the wider open countryside. Negative impacts to the High Weald Area of Outstanding Natural Beauty should be avoided.”

- 2.11. Document SD14 of HDC’s suggested Modifications to the R19 Local Plan proposes a change to Criterion 2b. Main Modification HM096 proposes that Criterion 2b should instead state:

“Development proposals within and adjacent to the High Weald National Landscape (AONB) must demonstrate how their development proposals conserve and enhance the natural beauty of this landscape. Proposals should have particular regard to the setting and views into and out of the National Landscape and all proposals must take account of the High Weald Management Plan.”

- 2.12. Elivia Homes has made the assumption that Main Modification HM096 is instead intended to be a new Criterion and is discussed under the heading ‘Criterion 2d’ below. However, clarification is required as to whether Main Modification HM096 replaces the existing Criterion 2b or is intended as an additional Criterion 2d.

ACTION REQUIRED: Clarify whether Main Modification HM096 replaces existing Criterion 2b or will form a new Criterion named 2d.

- 2.13. In regard to the existing Criterion 2b, a Landscape and Visual Impact Assessment (LVIA) was undertaken and submitted as part of application Ref: DC/24/1763. The LVIA concludes that:

“The proposed development will result in a Low magnitude and direct change to the setting of the National Landscape, changing a small part of Lower Beeding village from a formerly agricultural landscape, to a developed site of principally residential development with associated new infrastructure and landscaped spaces.”

- 2.14. Therefore, it has been justified that appropriate landscape mitigation can be incorporated within the two southern parcels of the Site to result in a low magnitude change on the wider landscape setting. The northern land parcel which has also been allocated in the Policies Map is therefore not required for the development of at least 30 dwellings.

- 2.15. Application Ref: DC/24/1763 proposes the retention of much of the existing trees and hedgerows across the Site, in addition to new planting. The LVIA considers that the new vegetation cover would not be out of context with the existing character of the wider setting of the Site, particularly with the approval of the nearby residential development (Ref: DC/22/0708). On this basis, the LVIA concludes that:

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“the proposed development would integrate visually and functionally into the existing urban fabric and be seen as an extension of it.”

2.16. It has therefore been justified through the evidence base of application Ref: DC/24/1763 that appropriate landscape mitigation can be implemented in the southern two parcels of the Site in order to aid an appropriate transition to the wider open countryside. Reference to the northern land parcel can therefore be removed from Criterion 2b and there is no reason why landscape requirements should only apply to LWB1 rather than all allocations in the village. Reference to the High Weald Area of Outstanding Natural Beauty can also be removed from Criterion 2b on addition of the proposed new Criterion 2d.

ACTION REQUIRED: Remove the reference specifically to LWB1 and to landscape requirements on the southern and northern parts of it. This is required to ensure the policy is positively prepared and effective. As such the Policy should be updated to reflect the wording on Box 2.

BOX 2: Proposed Policy Amendment

Strategic Policy HA11 (Lower Beeding Housing Allocations)

2. In addition to meeting national and Local Plan requirements, development will be supported where proposals:

- a) Comply with any policies, including site-specific policies, in a Made Lower Beeding Neighbourhood Plan. **Where there is conflict with a non-strategic policy in a Made Neighbourhood Plan which was Examined prior to the adoption of the HDLP, the strategic policy will take precedence in these instances.**
- b) Protect and enhance the setting of the Grade II listed Holy trinity church.
- c) **Ensure appropriate landscape mitigation to aid the transition to the wider countryside.**
- d) For LWB3, any proposal should positively contribute to the heritage qualities of Crabtree Conservation Area.

Criterion 2d (Main Modification HM096)

2.17. Paragraph 20 of the NPPF states that:

“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision¹¹ for:

...d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

- 2.18. Paragraph 180 of the NPPF emphasises the importance of planning policies to protect and enhance valued landscapes, in addition to recognising the intrinsic character and beauty of the countryside.
- 2.19. In order for Main Modification HM096 to be consistent with national policy, the policy must ensure that valued landscapes are protected and enhanced. Main Modification HM096 requires development proposals to demonstrate how the High Weald National Landscape will be conserved and enhanced and therefore is in accordance with paragraphs 20 and 180 of the NPPF.
- 2.20. However, paragraph 16 of the NPPF states that Plans should:
- “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”*
- 2.21. Main Modification HM096 duplicates draft Strategic Policy 16 (Protected Landscapes) of the HDLP near verbatim. Since Strategic Policy 16 applies to all development proposals within HDC, Main Modification HM096 should be removed in its entirety to be in accordance with paragraph 16 of the NPPF.

ACTION REQUIRED: Remove Main Modification HM096 to avoid duplication and ensure the policy is consistent with national policy.

3. Conclusion

3.1. This Examination Statement should be read in conjunction with the Regulation 19 representations submitted on behalf of Elivia Homes in March 2024.

3.2. Elivia Homes supports the HDLP and in particular the site allocation of LBW1. As demonstrated by the submission of application Ref: DC/24/1763, the site allocation is deliverable. However, in order for draft Policy HA11 to be found sound, in accordance with paragraph 35 of the NPPF, the following amendments are required:

- Remove the most northern parcel of site LWB1 from the Policies Map to show the correct site area of 2.7 ha. This is required to ensure the policy is effective;
- Update the wording of Criterion 2a of draft Policy HA11 to clarify how the HDLP will interrelate with any made Neighbourhood Plans should conflicts arise;
- Clarify whether Main Modification HM096 replaces existing Criterion 2b or will form a new Criterion named 2d;
- Remove the reference specifically to LWB1 in Criterion 2b and to landscape requirements on the southern and northern parts of the Site and instead, as recommended in Box 2, include a criterion regarding transition to the countryside. This is required to ensure the policy is positively prepared and effective; and
- Remove Main Modification HM096 from draft Policy HA11 to avoid unnecessary duplication and ensure that the policy is consistent with national policy.

Appendix A

Glossary

GLOSSARY

dph	Dwellings Per Hectare
HDC	Horsham District Council
HDLP	Horsham District Local Plan
LBNP	Lower Beeding Neighbourhood Plan
LVIA	Landscape and Visual Impact Assessment
NPPF	National Planning Policy Framework
R18	Regulation 18
R19	Regulation 19
SA	Sustainability Assessment
SNWRZ	Sussex North Water Resource Zone
5YHLS	Five-year Housing Land Supply

Appendix B Submitted Regulation 19 Representations

Horsham District Local Plan Regulation 19 Consultation

Land at Glayde Farm, West of Church Lane,
Lower Beeding



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1. Introduction

- 1.1. This representation has been prepared by Savills, on behalf of Elivia Homes (“Elivia”) in response to the Horsham District Local Plan Regulation 19 Consultation (herein referred to as “DHDLP” or “R19”). Elivia Homes have an option agreement on Glayde Farm and are in a position to submit an immediate planning application with their own Water Neutrality solution, with delivery of the whole site within the next five years.
- 1.2. Upon adoption, the DHDLP will replace the adopted Horsham District Planning Framework 2015 (“HDPF”). It will cover the period from 2023 to 2040 and is intended to deliver the social, economic and environmental objectives that are reflected in Spatial Objective 1.
- 1.3. At the R19 stage, the intention is to determine whether the DHDLP is capable of being found sound in line with the requirements of paragraph 35 of the National Planning Policy Framework September 2023 (applied in accordance with paragraph 230 of the December 2023 NPPF). Namely that they are positively prepared, justified, effective and consistent with national policy.
- 1.4. Whilst this representation highlights issues and objections with specific draft policies, the shortfalls are capable of being addressed through modifications. Recommendations are therefore made to this effect that if taken on board, would enable the Examining Inspector to find the relevant policies DHDLP sound.

Scope of Representation

- 1.5. This representation is made with regard to the Land at Glayde Farm, West of Church Lane, Lower Beeding which has been partly allocated for residential development within the emerging Lower Beeding Neighbourhood Plan (LBNP) which has reached referendum stage, and is identified as a draft site allocation in policy HA11 (site LWB1) of the DHDLP. The site has reference SA567 in the Sustainability Appraisal, and this reference has remained consistent throughout the Emerging Local Plan process.

About Elivia Homes

- 1.6. Elivia Homes was formed in 2022 through the coming together of their two regional, award-winning businesses, formerly known as Vanderbilt Homes and Crayfern Homes. Vanderbilt Homes was founded in 2004 and now operates as their Central region, while Crayfern Homes was founded in 1992 and operates as their Southern region. In 2023, Elivia acquired Millwood Designer Homes, which was founded in 1991, with it becoming their Eastern region. Elivia Homes is committed to delivering sustainable growth and maintaining a reputation as one of the most trusted high-quality housebuilders in the South East.
- 1.7. The Call for Sites and representations to the Regulation 18 Local Plan Consultation were made on behalf of Millwood Designer Homes. Elivia Homes confirm that they are in control of the land and that it is available and deliverable.

Structure of Representation

1.8. The representation is set out in the following chapters:

- Section 2 The Promotion: provides an update on the promotion site and development opportunity.
- Section 3 Evidence Base: will assess any relevant new evidence base documents where applicable to the site.
- Section 4 Representations on the Plan: provides representation on the relevant policies of the Regulation 19 DHDLP.
- Section 5 Conclusion: sets out concluding comments.

1.9. The representation is supported by:

- Appendix A: Site Location Plan
- Appendix B: Proposed Site Layout

2. The Promotion

Site Summary and update on the Promotion

- 2.1. The Land at Glayde Farm ('the site') is situated in Lower Beeding, approximately 6km to the south east of Horsham Town. Lower Beeding is classified as a small village in the settlement hierarchy where it is stated to have some level of services and facilities.
- 2.2. The site promoted within this representation ("the promotion") and allocated within draft policy HA11, falls within a wider site as shown on Figure 2.1 below. The land proposed for allocation plus the wider site is under the control of Elivia and is available for development.

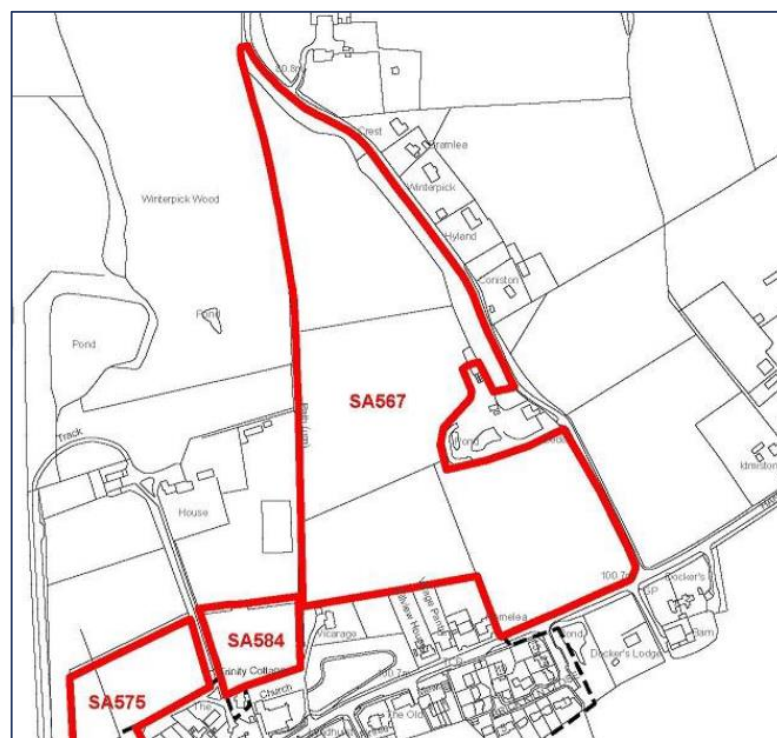


Figure 2.1: Glayde Farm (Wider Site) (site reference SA567) Site Location Plan

Source: Site Assessment Report supporting the Regulation 18 Consultation.

- 2.3. The land within Elivia control (as shown as SA567 in figure 2.1) comprises approximately 6.7ha of agricultural land and is located in the north-east of the village of Lower Beeding (see supporting location plan).
- 2.4. The site is bounded by mature hedgerow to the north and west, Handcross Road and residential development to the south, and Church Lane and residential development to the east. It falls adjacent to the defined settlement boundary. The wider surroundings comprise further agricultural land. A number of mature hedgerows delineate the site into four separate fields and a couple of isolated shrubs and trees are present across the site.

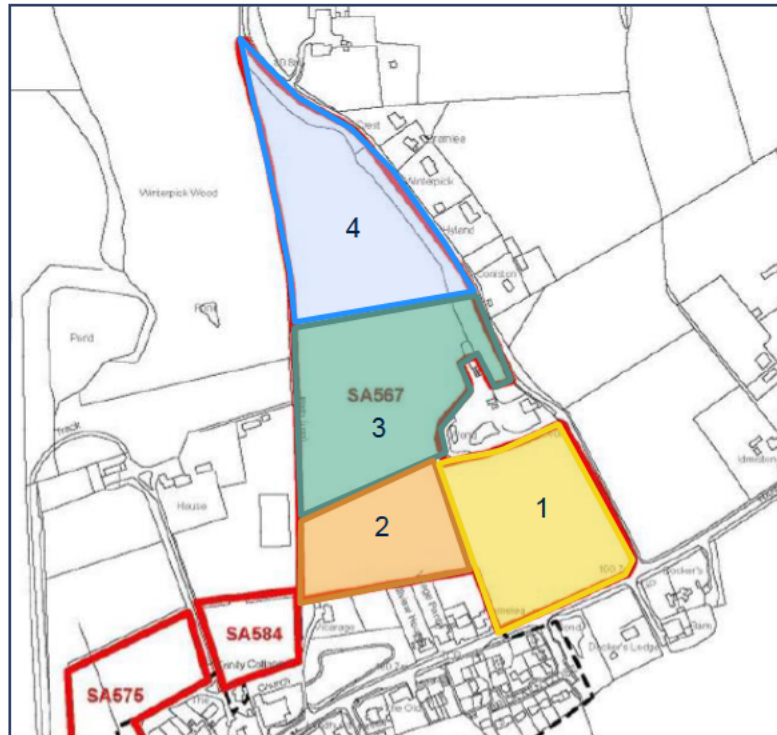


Figure 2.3: Glayde Farm – Site Parcel References

- 2.11. The proposed vehicular access would be achieved from Handcross Road. Pedestrian and cycle access are also proposed in this location. Further pedestrian access points are proposed on the east and west of the site connecting to existing footpaths and to Church Lane.
- 2.12. The residential development was formed of three developable areas defined by the existing hedgerows and the primary road. The development parcels are supported by a network of public open space.
- 2.13. Parcel 1 is situated to the east of the main entrance and proposes 19 units. This provides a mix of detached and semi-detached new homes at a low density, but also includes an apartment building and terraced housing fronting Handcross Road. Some of the homes front onto the primary road through the site, providing passive surveillance and active frontages. The remaining homes front onto open space which provides a buffer to Handcross Road and Church Lane. A large SuDS feature is included here.
- 2.14. Parcel 2 is on the western side of the main entrance and accommodates 15 units. This area comprises an apartment building as well as detached and semi-detached family homes.
- 2.15. Parcel 3 is the central field and proposes two cul-de-sacs, containing 14 units altogether. These provide a mixture of detached, semi-detached and terraced homes. The parcel is enclosed between the existing hedgerows. Within Parcel 3 is an area of open space that provides a natural transition into the countryside and more landscape-sensitive northern field (Parcel 4).
- 2.16. It is not proposed that any residential development will come forward in Parcel 4 and will instead only be used for ecological mitigation purposes.

Horsham District Local Plan Regulation 19 Consultation

Land at Glayde Farm, West of Church Lane, Lower Beeding



2.17. The pre-app officer provided comments on landscape, design and layout changes. Place Services provided feedback on the landscape and visual effects of the proposal and were comfortable that development could come forward in parcels 1-3. Specific comments sought to ensure:

- The protection of the countryside character;
- A landscape buffer to the western boundary with the public footpath, in addition to a landscape buffer along the southern boundary with the adjoining properties and a buffer to the northern boundary.
- Provision of a soft edge to the settlement and the countryside to the east.
- The open aspect of Parcel 2 is retained and to include open space fronting onto Church Lane.
- Reinforcement of hedgerows and field boundaries, particularly the southern boundary hedgerow adjacent to Handcross Road;
- The colour and material palette is reflective of the High Weald AONB character.

2.18. Elivia revised the layout to take account of these comments. The indicative layout is included at Appendix B and an extract provided below in Figure 2.4.

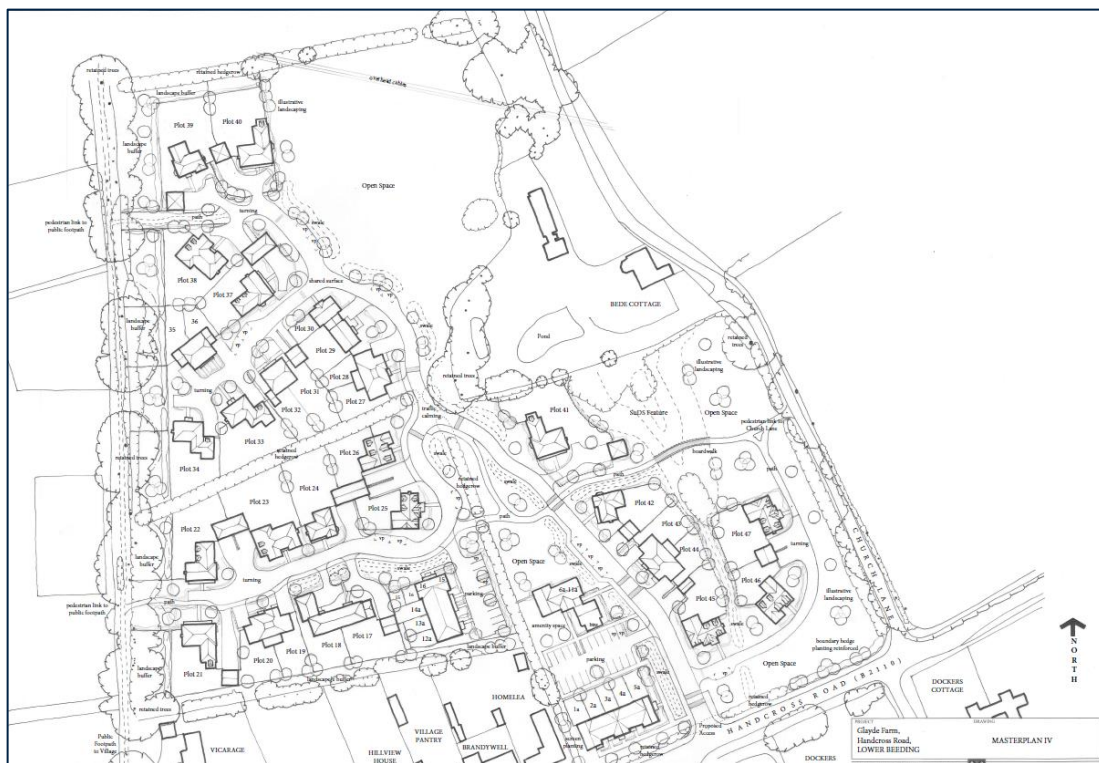


Figure 2.4 Indicative Site Layout

3. Evidence Base

- 3.1. HDC has published several new Evidence Base documents, two of which (the Sustainability Appraisal and Habitats Regulation Assessment) are stated to form part of the Regulation 19 consultation. Where applicable to the promotion, comments are provided on the evidence base documents here.

Site Assessment Report December 2023 – Comment

- 3.2. The Site Assessment Report has been updated since the version published as part of the Regulation 18 consultation some time ago. The site has continued to be assessed under reference: SA567 (Land at Glayde Farm West of Church Lane). In conclusion, HDC estimate that 30 dwellings can be accommodated on the site.
- 3.3. The site area has been amended with the red line boundary now removing the most northerly field parcel (Parcel 4), also amended to accurately reflect the site area stated. Elivia supports this correction albeit the actual capacity for the parcel shown is still considered to be greater, with plans having been prepared and discussed at pre-application stages with HDC, showing a higher number of dwellings on the same parcel (See section 2). Elivia considers that the site capacity should be increased to reflect this. HDC is aware of the higher capacity for the site, referring to promotion for 48 dwellings. This should not be discounted as Elivia is certain that a development of this scale is achievable and technical work has been undertaken to support this. Therefore Elivia considers that a developable quantum range would be more appropriate within the Site Assessment Report to allow details to come forward, whilst HDC maintains control of site capacity overall.
- 3.4. With regards to the conclusion on environmental considerations “unfavourable impacts with potential for mitigation” Elivia consider that this is too negative, given that none of the text falling within the environmental considerations category is negative, raising only possible issues that have not been confirmed as present (e.g. proximity of heritage assets but no stated impacts on the assets or their setting, or any resultant mitigation requirements). Therefore, Elivia considers that this should be changed to “neutral impact” but with potential for enhancements, including through high quality design.
- 3.5. Overall, HDC should be aware that a more accurate conclusion for the site will help to support the soundness of the plan, notably in respect of its justification and effectiveness.
- 3.6. With regards to social considerations, the previous paragraphs have touched on the possibility of a capacity range for the site, which is considered more appropriate given HDC’s conclusions in respect of housing.
- 3.7. In terms of the conclusion, the site assessment states a capacity of 30 units. It is unclear from the text if this is 30 in addition to the 14 which a draft allocated in the LBNP that has reached referendum stage. Elivia considers that it should be in addition to and therefore, a range of 45-50 dwellings for the site overall is more appropriate. This clarification would then feed directly into the DHDL – discussed below.

Sustainability Appraisal Update December 2023

- 3.8. The Sustainability Appraisal (SA) includes an updated assessment of the site (originally assessed as reference SA567; now assessed as policy HA11 site LWB1). The fact that the site has now been assessed by HDC as a standalone development opportunity is supported by Elivia.



3.9. With regards to the details of the assessment, there are 2 changes made by HDC – notably shown in the table below:

Table 3.1 – Comparison between the scoring of SA7 and SA8 for the site in the current (Reg.19, 2023) and previous (Reg.18, 2020) SA iterations

SA version / objective	SA7: Landscapes and townscapes	SA8: Historic environment
SA 2020 - SA567	--?	-?
SA 2023 – LWB1	--/+?	+/-?

3.10. The changes in respect of landscape objective SA7, from significant negative effect (--?) to mixed significant negative and minor positive effects likely (--/+?) is more favourable, albeit Elivia considers that this could further be amended to a “0” negligible effect, owing to previous representations on the site confirming mitigation and enhancements, and Elivia’s confirmation again that this will be achieved.

3.11. Equally, with regards to objective SA8, the change from minor negative effect (-?) to mixed minor effects (-/+?) is more favourable. It is appreciated that HDC would be unable to determine any impacts on heritage assets until a planning application is made and technical heritage evidence provided as part of that planning application. However, with appropriate design and mitigation this too could be amended to “0” which is ultimately the intention when an application is made for the site.

3.12. With regards to objective SA9 (efficient use of land) previous comments relating to the site do not appear to have been taken on board. Ultimately, whilst the site is identified as Grade 3 land on Natural England’s “Agricultural Land Classification map for London and the South East (ALC007)”, it is noted that these maps are not sufficiently accurate. Furthermore, the site is a small area of this land and used for pasture. It is not sufficient or significant enough to impact future food production in this location. As such, Elivia maintain that the relatively small release of Grade 3 land at the promotion site is outweighed by the housing need and arguably a more positive score would be more accurate.

3.13. Other suggested changes were provided at the Regulation 18 consultation stage, and are considered to still apply. These are set out below:

Table 3.2: Comments on other SA objectives

Objective	Comment
SA2: Access to services and facilities	Change requested: The promotion site is within 450m of the primary school. A bus stop is within a 15-min walk, which provides regular access to Horsham Town. This will create a positive effect.
SA3: Inclusive communities	Change requested: Inclusive communities covers a broader subject beyond local regeneration and deprivation. The promotion will be fully inclusive with policy compliant affordable housing creating a positive effect.
SA6: Biodiversity and geodiversity	Change requested: No Ancient Woodland within or adjoining the sites. It is unlikely that the promotion will cause adverse impacts. Change to Neutral/Negligible.
SA10: Mineral resources	Change requested: The size and location of the site indicates that it is not suitable for mineral extraction. Change to Neutral/Negligible.
SA12: Flooding	Change requested: The location in Flood Zone 1, alongside SuDs would mean that the run off rate would be maintained plus an allowance for climate change. Change to Neutral/Negligible.

Built-Up Area Boundaries - November 2023: Object; not positively prepared or effective

3.14. This document assesses sites that were promoted to earlier stages of the Local Plan process and makes a recommendation for amendments to built up area boundaries where relevant. Elivia object to the proposed changes at Lower Beeding, on the basis that the changes shown for the village (page 43 of the PDF document) show only 1 amendment to the west of the village, to encapsulate existing built form. However, there is additional built form in the village that could arguably also be included. More pertinent however is the fact that the site which is proposed to be allocated in policy HA11 – site LWB1 (and equally LWB2 which is not subject to these representations) should also be included.

Action required: In order to be positively prepared and effective at delivering housing in this location, and to support the allocation policy, the built up area boundary for Lower Beeding must be amended to (at the very least) include the site allocations.

Landscape Capacity Assessment Rev C (May 2021) - Object

- 3.15. The Landscape Capacity Assessment (LCA) has been updated since the comments in our Regulation 18 Representations. However, the assessment on the Local landscape Character Area (LB2) in which the site was included does not appear to have been updated. As such the comments within the Regulation 18 Representations are still valid.
- 3.16. The Planning Practice Guidance explains that Landscape Character Assessments should inform sensitivity and capacity studies. HDC's Landscape Character Assessment dates from 2003 and is considered to be significantly out of date. Thus, the information underpinning the LCA is not justified.
- 3.17. It is reiterated that the Land at Glayde Farm is assessed as a part of a much wider area which encloses the west and north of Lower Beeding and so the specific landscape qualities of the site have not been truly reflected. Area LB2 includes the approved development at the land at Sandygate Lane and the land at Trinity Cottage (allocation within the LBNP). The assessment of LB2 has identified the area to have a low-moderate capacity for small scale housing development (i.e. circa 60 dwellings at a density of 25 – 30 dwellings per hectare) and no/low capacity for medium scale development (i.e. 60-250 dwellings at a density of 30-35 dwellings per hectare).
- 3.18. The landscape and visual impacts caused within medium scale development could significantly change dependant on whether a proposal is at 60 or at 250 dwellings. This assessment technique is not considered an effective way to identify the landscape capacity in an area and Elivia do not support this approach. For example, in Lower Beeding, collectively the proposed development could result in approximately 80 dwellings, 20 dwellings over the theoretical limit for 'small scale development' but a considerable 170 dwellings less than the upper limit of 'medium scale development'. This limit takes no account for the type or size of homes or the mitigation that can be delivered alongside them.
- 3.19. At paragraph 1.8 of the LCA, HDC has acknowledged that:
- "Landscape sensitivity and capacity levels are indicative, and it is expected that further analysis at a smaller scale and a more detailed assessment of the area would be carried out in relation to specific applications to determine the actual capacity of the site."*
- 3.20. Elivia support this and advise that capacity of an allocation in landscape terms should be informed by site specific assessment. As a consequence, the LCA should not preclude approximately 80 dwellings coming forward in Lower Beeding unless site specific assessment demonstrates adverse effects. It is strongly considered, that with sensitive design, the area is capable of accommodating the development in landscape terms and will provide additional benefits such as defining a more sensitive landscape led settlement edge. As such, Elivia consider that area LB2 is capable of accommodating development at the lower end of 'medium scale development' and this should be reflected in the LCA.

The approach to the LCA is not a justified approach that allows policy makers to truly assess the ability for a site to accommodate development. In Lower Beeding it is considered that there is capacity to accommodate development at the lower end of 'medium scale development'.

4. Representations on the Local Plan

- 4.1. The purpose of the DHDLP is to deliver the social, economic and environmental needs of Horsham and the wider area. The following comments are provided in respect of the tests of soundness, legal compliance and the duty to cooperate, and are provided to help HDC ensure that the plan can pass the examination process.
- 4.2. For avoidance of doubt comments are provided in respect of the site promotion only and not on any other policies that are not immediately and directly relevant to the promotion and draft allocation. This does not prevent Elivia from commenting further at any additional consultation stages or at the Examination.

Insert Map 20 – Lower Beeding: Object; not positively prepared or effective

- 4.3. The settlement boundary for Lower Beeding should be amended to reflect the proposed allocations in Lower Beeding, and in particular site LWB1 (the promotion site).
- 4.4. Once built out, the development will appear as a seamless addition to the village. Failing to amend the settlement boundary in this way is not considered to demonstrate that the plan is positively prepared.

ACTION REQUIRED:

Extend the built up area boundary for Lower Beeding to include the allocation of the site.

Strategic Policy HA11: Lower Beeding Housing Allocations – Support in Principle the allocation LWB1; comment on detailed matters

- 4.5. Whilst Elivia supports this policy in principle and the proposed allocation of the promotion site under part LWB1. However, there is a risk that this policy fails the tests of soundness as it is not positively prepared or effective at meeting relevant housing needs. Policy wording in its current form also raises concerns regarding the overall effectiveness of the policy in achieving the desired outcome for housing delivery. It remains that there are a number of matters that require clarification and amendment in order to ensure that the policy is sound.
- 4.6. Primarily is that the site area for LWB1 is stated to be 2.7ha. This is incorrect and must be changed to reflect the Site Assessment Report which accurately confirms the site as 4.6ha. The evidence base and pre-application advice received so far supports an allocation of this scale and there is no justification provided in any documents for a reduction from this, nor in the planning pre-application enquiry.

ACTION REQUIRED:

Update the site area for LWB1 to 4.6ha. This is required to ensure the policy is positively prepared and effective.

- 4.7. Secondly, HDC needs to provide clarification on the quantum of development – as the site is part allocated for 14 dwellings in the LBNP and the remainder of the site is capable of delivering another 30-35 dwellings – as demonstrated in the pre-application submission to HDC. If the proposed allocation of the site for 30

dwelling is based on a 2.7ha site, then it is clear from the evidence base and the pre-application submission that a larger quantum can be delivered. Elivia has shown that 48 dwellings can be suitably accommodated. If HDC does not want to be as prescriptive, it is suggested that a range is stated in the policy instead – namely 45-50 dwellings. The text must also confirm how the LBNP policy and Draft Policy HA11 interrelate. The policy and evidence base is not clear on this. Otherwise, the policy wording must be changed to confirm that the 30 home allocation on the 2.7ha site is in addition to the 14 home allocation in the LBNP. The allocation plan must also then be amended.

ACTION REQUIRED:

Increase the proposed allocation yield to more accurately reflect the promoted capacity of the site. This is required to ensure the policy is both effective and justified.

- 4.8. Part 2 b of the policy then states a site-specific requirement for LWB1, namely: *“In the case of LWB1, development should be focussed to the southern part of the site with appropriate landscape mitigation to be implemented on the northern half of the site to aid a transition to the wider open countryside.”*
- 4.9. Elivia understand HDCs intention, however it is not necessary to restrict the development in such a way. As the pre-application plans show, a suitable area of landscaping can be provided within Parcel 3, achieving the transition into the wider landscape that is ultimately sought. Therefore, development does not need to be entirely limited to Parcels 1 and Parcel 2, and can also be provided in Parcel 3 without unacceptable harm. Landscape mitigation in the form of screening should be limited to reinforcing existing boundaries with additional planting. There is equally no reason why this only applies to LWB1 rather than all allocations in the village.

Action required: Remove the reference specifically to LWB1 and to landscape requirements on the southern and northern parts of it. This is required to ensure the policy is positively prepared and effective. As such the Policy should be updated to reflect the wording on Box 4.1 overleaf.

BOX 4.1: Proposed Policy amendment

Strategic Policy HA11 (Lower Beeding Housing Allocations)

The policy should be amended from the following existing wording:

1. *The following sites are allocated, as shown on the Policies Map, for the provision of at least 43 homes:*
 - *LWB1 – Land at Glayde Farm, West of Church Lane, 2.7 hectares (30 homes)*
 - *LWB2 – Land at Trinity Cottage (Land South of Church Farm House), 0.5 hectares (7 homes)*
 - *LWB3 – Land at Cyder Farm 0.15 hectares (6 homes)*
2. *In addition to meeting national and Local Plan requirements, development will be supported where proposals:*
 - a) *Comply with any policies, including site-specific policies, in a Made Lower Beeding Neighbourhood Plan;*
 - b) *Protect and enhance the setting of the Grade II listed Holy trinity church. In the case of LWB1, development should be focussed to the southern part of the site on the site identified on the policy map with appropriate landscape mitigation to be implemented on to the northern half of the site to aid a transition to the wider open countryside. Negative impacts to the High Weald Area of Outstanding Natural Beauty should be avoided; and*
 - c) *For LWB3, any proposal should positively contribute to the heritage qualities of Crabtree Conservation Area.*

To the following proposed wording:

1. *The following sites are allocated, as shown on the Policies Map, for the provision of at least **58** homes:*
 - *LWB1 – Land at Glayde Farm, West of Church Lane, **4.6** hectares (**45-50** homes)*
 - *LWB2 – Land at Trinity Cottage (Land South of Church Farm House), 0.5 hectares (7 homes)*
 - *LWB3 – Land at Cyder Farm 0.15 hectares (6 homes)*
2. *In addition to meeting national and Local Plan requirements, development will be supported where proposals:*
 - a) *Comply with any policies, including site-specific policies, in a Made Lower Beeding Neighbourhood Plan;*
 - b) *Protect and enhance the setting of the Grade II listed Holy trinity church.*
 - c) ***Ensure appropriate landscape mitigation to aid the transition to the wider countryside.** Negative impacts to the High Weald Area of Outstanding Natural Beauty should be avoided; and*
 - d) *For LWB3, any proposal should positively contribute to the heritage qualities of Crabtree Conservation Area.*

Strategic Policy 37: Housing Provision – object; not positively prepared and inconsistent with national policy

- 4.10. The Standard Method for calculating housing need is the starting point for determining housing requirements and should be applied unless exceptional circumstances exist. In HDC's case, this (at 2023) was 911 dwellings per annum (DPA). Over the 17 year plan period, this amounts to 15,487 dwellings as a minimum.
- 4.11. The first point to note is that depending on the timing of submission, HDC may need to review housing provision, in light of any update to the standard method. This can be achieved through an update report before submission or if applicable prior to the Examination process. Where applicable consultation may also be required.
- 4.12. Notwithstanding this, HDC's position is that it will deliver 13,212 dwellings; an average of 777dpa. This leaves a shortfall of 2,275 dwellings; therefore failing to meet the district's minimum housing needs over the plan period.
- 4.13. Whilst HDC explains its position in respect of exceptional circumstances and the issue of water neutrality, Elivia does not agree that there is sufficient evidence within the plan and evidence base to support the proposed shortfall in housing provision. It is accepted that this may well have impacted early delivery in the plan period. Resolutions will have to be found by the relevant water and statutory bodies and this cannot be the sole reason for preventing development and failing to address housing needs. If HDC is seeking to restrict the amount of development it allocates in the plan, as a result of water neutrality, or indeed any other technical matter, then it is essential that there is sufficient evidence base available to back up the position. Elivia does not accept that this has been provided. Consequently, this policy is neither positively prepared or justified.
- 4.14. Concerns are further exacerbated by the fact that adjacent and nearby local authorities in the same housing market area (HMA) are also failing to meet their own housing needs. HDC's approach does not seek in any way to address these cooperatively. Equally, HDC's own unmet needs cannot be accommodated elsewhere in the HMA and so the shortfall, and resultant impact on affordability will continue. HDC, when adopting the HDPF, had to agree to an early review to address housing shortfalls at the time. It appears that the same scenario is arising again; albeit the plan does not appear to include any form of review mechanism or commitment to early reassessment of sites to address known housing shortfalls in the district or wider HMA.
- 4.15. Site LWB1 has capacity to accommodate between 45 and 50 dwellings with its own water neutrality solution. HDC is aware of this given pre-application discussions and details of this promotion. There is no reason why the proposed yield for this allocation cannot be increased to help, albeit in a small way, address the housing shortfall.

ACTION REQUIRED:

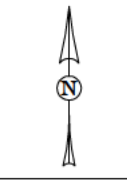
Strategic Policy 37 is at risk of not being positively prepared or justified. It is recommended that the HDC seek to deliver their identified housing need and optimise sites that have been branded as suitable. As such, the residential developments proposed at Site LWB1 can be boosted.

5. Conclusion


- 5.1. This representation has been prepared by Savills, on behalf of Elivia Homes in response to the Regulation 19 consultation of the DHDLP. The representation has been submitted within the consultation timeframe and provide observations on the proposed policies and evidence base within the Regulation 19 Consultation Document.
- 5.2. Representations are provided specifically with regards to the proposed allocation in policy HA11, part LWB1 - at Land at Glayde Farm, West of Church Lane, Lower Beeding. This site has already been partially allocated for a development of 14 dwellings in the LBNP which has reached referendum stage. Elivia Homes support the allocation of the wider site and can deliver it immediately, but their objection is one of estimated yield and extent of development.
- 5.3. The site has been assessed by HDC and is estimated to accommodate 30 dwellings. The proposed allocation reflects this. However, the developable area appears to be smaller than the site area assessed by HDC within the evidence base. It is also unclear whether the allocation for 30 dwellings, is in addition to the allocation for 14 dwellings in the LBNP – policy wording would suggest as such but this needs to be clarified. Elivia takes the view that the site is capable of accommodating 45-50 dwellings.
- 5.4. This representation has highlighted a number of issues and errors within the plan and evidence base that need to be rectified in order for the plan to be found sound. Elivia support the application of the site and the principle of the allocation policy, but it is clear that proposed changes are needed to ensure that the evidence base and policy and consistent and therefore justified.
- 5.5. With regards to overall housing delivery, Elivia object on the basis that the proposed housing provision over the plan period is not positively prepared or effective. There are also no sufficient reasons or evidence provided for the known shortfall of housing. If sites such as LWB1 are used more effectively, this shortfall could be reduced. There is also no mechanism in place to address any of the known unmet needs of adjacent authorities such as Crawley.
- 5.6. Elivia Homes and Savills would like to thank HDC for the opportunity to comment on the Regulation 19 Local Plan Consultation and welcome any future opportunities to comment on the emerging Local Plan. If HDC submit the Plan for Examination following this consultation, Elvia Homes and Savills kindly request to be notified and allowed the opportunity to appear at the Examination if applicable to their site at LBW1.




Appendix A Site Location Plan



KEY

 Site Boundary



REV.	DESCRIPTION	REF.
	 MILLWOOD <small>Designer Homes Limited</small> <small>Part of Places for People</small>	PROJECT Gayde Farm, Lower Beeding
		TITLE Location Plan
SCALE	1:1250 (A1)	DRAWING NO.
DATE	Mar 23	P363 / PL / 1101
DRAWN	SL	REVISION
		-



Appendix B Masterplan



PROJECT		DRAWING	
Glayde Farm, Handcross Road, LOWER BEEDING		MASTERPLAN IV	
MILLWOOD		DESIGNER HOMES LIMITED	
DRAWN	DATE	SCALE	DWG. NO.
PSB	July '23	1:500 @ A1	P363/MP/304
			REV. DATE

Appendix C

Proposed Site Layout

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All dimensions are to be checked on site prior to setting out and fabrication and ON Architecture Ltd should be notified of any discrepancy prior to proceeding further.

For Construction & Fabrication Purposes - Do not scale from this drawing, use only the illustrated dimensions herein. Additional dimensions are to be requested and checked directly.

Illustrated information from 3rd party consultants/specialists is shown as indicatively only. See other consultant / specialist drawings for full information and detail.

All aspects of the architectural design concerning fire performance / fire safety (whether or not illustrated / annotated) are to be considered as 'For Approval only, irrespective of the drawing status / suitability.



ELIVIA

— HOMES —



Revision Note & Date		Note	Amended	Checked
Rev	Date		GA	DK
A	30/10/24	Sub updated following comments	GA	DK
B	04/11/24	Minor amendments following clients comments	GA	DK

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Project Title
**Proposed Residential Development,
Land at Glayde Farm, Lower Beeding
Elivia Homes Eastern**

Drawing Title
**Proposed Site Layout
Roof Plan**

BIM Number	Scale	Date	Drawn	Checked
-	1:500@A1	July 2024	GA	RDT

Drawing Status
PLANNING ISSUE

Project No.	Drawing No.	Status	Revision
21.176	101	-	B

