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# Representations on the Amberley Pre-Submission Draft Neighbourhood Plan 2016-2032

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The Parham Estate



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## 1.0 Introduction

- 1.1 Savills (UK) Limited have been instructed by the Parham Estate to submit representations on the Amberley Pre-Submission Draft Neighbourhood Plan. The Estate owns land opposite the Sportsman Inn public house in Rackham Road and these representations are submitted in support of its inclusion as a potential development site in the Neighbourhood Plan. This follows our letter to the Council on the 20<sup>th</sup> January 2016 that set out the Estate's available development land in the Parish for consideration as part of the initial plan making process. Following further engagement with the Parish Council and in response to the draft plan, we are now providing further detailed comments.
- 1.2 Although land opposite the Sportsman inn public house is the main focus of our representation, our comments also reflect the fact that the Estate own other sites in the Parish and we have therefore assessed the plan in light of the Estates role as an interested local landowner.
- 1.3 These representations set out a brief background to the Parham Estate and assess the contents of the draft plan and the specific policies. Following this the representations address the draft housing allocation and set out details of the potential development site opposite the Sportsman Inn public house in Rackham Road.



## 2.0 Background to The Parham Estate

- 2.1 The Parham Estate is focused around Parham House and gardens and has a longstanding involvement in the local area. It continues to hold land around Storrington and within Amberley Parish and the Estate retain a strong interest in the local area.
- 2.2 As a landowner, the Estate leases land for various different purposes across the local area including land in Amberley Parish at the western end of Rackham Road to the Parish Council for use by the community as a football pitch. It is in the interest of the estate that the special intrinsic rural character of the local area is retained and enhanced and that suitable and sympathetic development should come forward at appropriate locations to ensure that the area thrives and evolves into the future.

## 3.0 Assessment of Draft Plan

- 3.1 In general the Estate supports the contents of the draft plan, but considers the need to amend various policies for clarity and include more than one development allocation site to meet the minimum 6 dwelling Parish requirement and provide a better spread of new development across the Parish minimising the impact on the surrounding infrastructure. Our comments on the plan are as follows:
- 3.2 We have reviewed the strengths, weakness, opportunities and threats on Page 12 of the plan and believe that it generally gives a good overview of the current position. However, under weaknesses the closure of the Black Horse Pub could also be construed as a general threat to the other pubs within the Parish and there should be more of a focus in the plan on helping to retain these community assets. The main issue that would put potential customers off returning to the existing pubs is parking facilities.
- 3.3 Parking issues are also identified under the weaknesses section from the point of view of the existing residents. An example of this is the current limited parking capacity at the Sportsman Inn public house on Rackham Road. The limited availability of the parking spaces would have an impact on whether a customer decides to return, but the situation also impacts on the amenity of the existing residents along Rackham Road where customers routinely park when the car park is at full capacity.
- 3.4 Paragraph 3.5 of the plan sets out the results of the action in rural Sussex (ARIS) study of local housing need which was completed in May 2015. It is interesting to note that the highest percentage of properties in the Parish are detached properties of 47.6% followed by semi-detached properties at 34.7% and terraced properties at 11.1%. It would be easy to read into this survey that because of the smaller proportion of the terraced housing and other dwelling types such as flats, there is a need for this type of dwelling within the Parish when compared to the higher percentage of detached properties. However, the high percentage of detached properties reflects the nature and character of the Parish and it would suggest that in these terms the development of new detached properties would be more appropriate and sympathetic to retaining the intrinsic rural character of the Parish.
- 3.5 On Page 17 under Tourism, we believe that the village pubs should be included in a bullet point under the “Parish attracts visitors for a variety of reasons” section.
- 3.6 Paragraph 4.1 sets out the vision for the Parish. The Estate agrees that the Parish should maintain its intrinsic rural character whilst allowing for sustainable development to ensure the survival of key facilities.
- 3.7 The Estate also endorses Core Objective 1 in relation to the provision of new residential development which complements the current character of the Parish and supports a variety of solutions to identify needs. Core Objective 6 and 8 are also supported as they allow the promotion of facilities to support tourism and visitor use and address parking issues.
- 3.8 Policy EN2 addresses landscape, character and open views and states that all development must maintain the local character of the landscape and not cause any loss or diminution on significant views that currently provide open field aspects. There is a potential conflict here with the presumption in favour of sustainable development.

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Development proposals can to a certain extent protect some views onto open fields, but the plan must recognise that development in itself will cause some loss to views from certain aspects. The policy should look to minimise this impact rather than maintain the status quo to make the policy more realistic and deliverable.

- 3.9 The Estate agrees with Policy EN5, bullet point 2 that requires for planning permission to be supported that development is in keeping with the existing designed on natural landscapes and maintains the individual identity of settlements. This relates back to our point at 3.4 of this report that the Parish is to a certain extent characterised by a predominance of detached dwellings, the advent of which are important in maintaining the intrinsic character of the area.
- 3.10 Paragraph 5.4 acknowledges that car parking is an increasing challenge for the Parish. We also agree that one of the main hotspot locations is Crossgates, outside and either side of Sportsman public house. However, the land shown on the proposals map for the development of a new car park is a considerable distance away from this main hotspot location. It will help to alleviate parking congestion within the village, but it will not address the issues outside of the Sportsman Inn public house. We would therefore encourage the Parish to allocate further parking on the Estate owned land opposite. The Plan at Appendix 1 shows how this could be accommodated.

### Housing

- 3.11 Paragraph 5.5 sets out the general policy for the type of homes that are required within the Parish. The required housing mix is based on the AIRS survey, which was completed by 32.5% of the Parish residents. Of this 32.5%, 66.3% were in favour of affordable housing development in the Parish and 60.9% were opposed to open market housing. Although the plan at this point recognises that other engagement with the Parish has revealed a desire for some small open market houses, the Estate believes that the plan should also recognise that in order for the Parish to continue to grow and for the facilities to continue to be viable, all types of market housing should not be ruled out.
- 3.12 It should also be recognised in the plan that open market housing can provide for and address identified local needs within the Parish that affordable housing development may not.
- 3.13 This view carries on into Policy HD3 which requires all applications for new housing to demonstrate how the proposal meets the specific housing needs of the Parish. The Estate believes that this policy is too restrictive and should state that it should be read in conjunction with the other policies in the Neighbourhood Plan to provide an adequate balance of other issues such as impact on character. It must also be recognised that specific housing needs should not be measured solely on the survey that was undertaken in 2015 that only takes into account the views of 32.5% of the Parish residents. It should allow scope for wider evidence bases such as the South Downs National Park Authority's and Horsham District Council's Strategic Housing Market Assessments (SHMA) that are important indications of housing need in the area.
- 3.14 Policy HD6 addresses windfall sites and allows development to come forward on infill sites within the recognised settlement boundary. Although the Estate agree that windfall sites are an important addition to the supply of housing within the Parish, the policy is too restrictive in only allowing sites within the recognised

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settlement boundary to come forward. The National Planning Policy Framework (NPPF) and indeed Policy HD1 of the Neighbourhood Plan sets out the presumption in favour of sustainable development. By restricting windfall development to existing settlement boundaries the plan could potentially be in conflict with the presumption as some sites outside on the edge of the boundary could meet the criteria for sustainable development. Therefore, the policy should be amended to take into account such circumstances.

- 3.15 Policy HD9 requires new development to be subject to planning conditions that requires new development to be marketed to existing residents or people with local connections in the first instance. It is not clear in this policy whether it specifically relates to affordable housing or whether it also relates to any proposed market housing. The policy states in the first sentence that affordable housing delivered as part of HD5 and HD6 will be subject to this, but it later goes onto to state that the property may be offered on the open market if it does not sell within 6 months of marketing to those with local connections. The Estate believes that although the properties will require marketing to local connections for the first 6 months, the price the property is advertised at should not be affected. This is to ensure that the viability of development remains intact and that the policy only gives an advantage to those who specifically want or need to move within the Parish and not considered to be an incentive.
- 3.16 Policy ET3 addresses tourism. We believe that this policy should be widened out to include permission for facilities and 'associated infrastructure' connected with tourism.

## 4.0 Allocations of Land for Development

- 4.1 We understand that the Parish must allocate a minimum of 6 dwellings for development in the Neighbourhood Plan. Currently, the draft plan allocates one site in the centre of the village to meet this need. However, the Estate believes that the need should be spread across at least two separate sites to reduce the impact on the surrounding road network and also ensure that the wider Parish is covered and not just the village centre. Having two development sites to meet the need can also have the benefit of addressing identified needs within the Parish such as parking for example. There would also be less impact on the existing and surrounding properties and amenities.
- 4.2 With the above in mind, the Estate is submitting for consideration an illustrative development scheme on land opposite the Sportsman Inn public house on Rackham Road to meet the housing needs. The site has already been assessed positively as part of the Neighbourhood Plan process. The Housing Sites Report that forms part of the housing evidence base for the plan states that “given the configuration of adjoining residential development at Crossgates immediately to the east, that part of the site is suitable for a housing scheme.” Therefore it should be included for consultation within the Draft Plan.

### **Land opposite the Sportsman Inn public house, Rackham Road**

- 4.3 The proposed site is currently in use as a grazing paddock for horses. It is adjacent to the existing residential properties along Rackham Road and opposite the Sportsman Inn public house and other residential dwellings across the road. The site stretches from the existing development on Rackham Road to the detached residential property to the south. It therefore forms an infill site that is relatively flat and has access from both east and west sides onto Rackham Road. There is some perimeter screening along the northern boundary and fencing marks out the extent of the site.
- 4.4 Attached at Appendix 1 is a proposed Site Plan that shows the extent of the ownership and an illustrative development of three detached dwellings. The Proposed Plan also shows an area of land potentially dedicated to car parking. The provision of this site for market housing would allow for development of the car park to address the current “hotspot” parking issue along Rackham Road. The parking will provide an overflow car park for the Sportsman Inn public house, thereby reducing the conflict between the existing properties and customers of the pub.
- 4.5 Therefore this proposal will help to meet the local housing needs of the Parish and the identified parking needs in this specific area.
- 4.6 The plan is an example of how the site could be developed and care has been taken to ensure that landscaping is adequate to shelter the long views into the site of the new development, but not too much as to detract from the open field character of the landscape.
- 4.7 It is recognised that the site is outside of the settlement boundary, but it is located on the boundary and considered a sustainable development site despite this because it is within walking distance of the services and facilities in the village, is opposite a bus stop and is well connected to the existing residential development.

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- 4.8 The Estate recommend that the site is included as a housing allocation for 3 dwellings in the Neighbourhood Plan, which will also enable a further car parking allocation to meet the identified need.

## 5.0 Conclusion

- 5.1 The Estate would like to thank the Parish Council for the opportunity to input into the Amberley Neighbourhood Plan process. The Estate is a key landowner in the Parish and retains an important interest in its future of development.
- 5.2 Generally the Estate would support the Draft Neighbourhood Plan if there are amendments and changes to the planning policies to ensure that more development sites are available in the document for consultation and that important facilities and infrastructure are recognised.
- 5.3 The Estate believe that there should be more than one housing allocation in the Plan and has put forward a potential development site opposite the Sportsman Inn public house. It proposes the potential development of three dwellings that would allow the use of part of the land for car parking for the pub. This would alleviate current parking pressures on Rackham Road and address both the housing need for the Parish and the identified parking issues in this area.
- 5.4 We would be happy to meet with the Parish Council and its representatives to discuss these representations in more detail if required.

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## APPENDIX 1

(See separate attachment)