



Bramber Neighbourhood Plan Examination

**Statement by Horsham District Council in response
to the Independent Examiner's Request for Points of
Clarification (sent 22 June 2020)**

Questions for the District Council

1.0 Introduction

- 1.1 This position statement is in response to the Examiner's request for clarification (22 June 2020) in relation to the allocation of land for residential development by Neighbourhood Plans and the timetable for the preparation of the Local Plan. This statement also addresses if the Council is satisfied with the Bramber Neighbourhood Plan's proposal to defer consideration of the provision of new dwellings until the emerging Neighbourhood Plan has been adopted.

2.0 Context

- 2.1 The Parish of Bramber has been designated as a Neighbourhood Plan area since 15 February 2018. The Steering group leading the preparation of the neighbourhood plan has undertaken extensive engagement in the preparation of the Neighbourhood Plan.
- 2.2 The Parish published a Pre-Submission Plan for consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This consultation was held between 21 September 2019 to 2 November 2019. Comments were considered and the Pre-Submission Plan was amended accordingly. A revised "Submission Plan" was then formally submitted to Horsham District Council, in accordance with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012. A six week consultation was held on the Bramber Submission draft Neighbourhood Plan. Representations were invited between 16 March 2020 and 27 April 2020.

3.0 Timetable for the preparation of the Local Plan

Question: Is the Local Plan Review timetable still proceeding to that available on the District Council's website and the Local Development Scheme?

- 3.1 Horsham District Council is currently preparing a Local Plan Review (2019 to 2036) which will eventually supersede the adopted Horsham District

Planning Framework (HDPF). The Local Plan Review has completed the Regulation 18 Draft Consultation; this ran for 6 weeks from 17 February concluding on the 30 March 2020 receiving over 6,000 representations.

- 3.2 The new Local Plan will set out how the Authority will meet the additional housing requirements which arise from the standard housing methodology and any Duty to Co-operate requirements. The locational strategy to meet these housing numbers is a strategic matter and will be addressed in the emerging review of the Horsham Local Plan. It will take account of the Council's revised evidence base and Sustainability Appraisal process. The proposals for meeting the housing requirement arising from the standard housing methodology are set out in Chapter six of the consultation document.
- 3.3 The Horsham District Local Plan Regulation 18 document has limited weight and has a number of stages to progress through before the Plan can be adopted. Thus, even having regard to the housing need arising from the standard methodology which is the basis for the Local Plan Review and the strategy proposed by the Local Plan to meet that need, at this time Bramber Parish Council cannot plan beyond the current adopted plan requirements set out in the HDPF. Subject to the outcome of Local Plan process any additional needs for the Parish will need to be met in the Council's Local Plan and the Parish Council has confirmed it will work with the officers as part of a Local Plan process. The Parish will continue to monitor the policies in the Bramber Neighbourhood Plan to ensure they are kept up to date and in particular following the completion of the Local Plan .
- 3.4 Horsham District Council would like to advise the examiner the Council are working to an amended Local Plan timetable. HDC are working towards a Pre-submission Draft of the Local Plan, Regulation 19, for early 2021, with submission and examination following later in 2021. The revised timetable can be found on the Council website: <https://www.horsham.gov.uk/planning/local-plan/local-plan-review->

[timetable](#). The Local Development Scheme will be updated in the coming weeks to reflect this new timetable.

- 3.5 The Coronavirus COVID-19 outbreak has had an effect on all of our lives. At Horsham District Council we will endeavour to keep all of our communities safe. Neighbourhood Planning groups will be kept up to date with any changes or updates in guidance. With regards, to the Local Plan preparation, Government's advice has been explicit regarding Local Plan preparation with guidance to progress as much as possible employing new technology where possible and encourage initiatives to engage with local communities. At the time of writing, officers are processing the thousands of representations received during the Regulation 18 consultation with this exercise near completion. Therefore, the Council will continue the work on the preparation of the Local Plan and Regulation 19 Submission Documents, as per the timetable on our website, whilst having regard to the up to date government guidance if/as it changes.

4.0 Residential development allocations in Neighbourhood Plans

Question: I note that the District Council supports the submitted Plan's intention to defer consideration of the provision of new dwellings in the neighbourhood area until the emerging Local Plan has been adopted and any 'made' neighbourhood plan at that time is reviewed.

Within this context please can the District Council advise to what extent other neighbourhood plans in the District have allocated land for residential development to contribute towards the 1500 dwellings required by Policy 15 of the adopted District Planning Framework?

- 4.1 The starting point for the preparation of the BNDP is the Horsham District Planning Framework (HDPF). Policy 15 of this Plan sets out the Strategic Housing Provision in the Horsham District. This is for a provision of 16,000 homes. Part d of the policy says that at least 1500 of the aforementioned overall provision will be allocated through Neighbourhood Plans, and to be in

accordance with the settlement hierarchy. There is no specific housing provision in the policy for each parish area.

- 4.2 Horsham District Council are working closely with Neighbourhood Planning groups to ensure there is an adequate provision of residential development allocated through Neighbourhood Plans. There are 24 designated Neighbourhood Areas in the Horsham District, with neighbourhood Plans at various stages of development. There are seven 'made' Neighbourhood Plans which allocate land to deliver 394 dwellings. Furthermore, Upper Beeding, Henfield, Southwater and Shipley have recently completed examination in May/June 2020 contributing a further 829 dwellings through allocations in their respective neighbourhood plans. The cumulative total for made neighbourhood plans and plans waiting to proceed to referendum equates to 1223 dwellings. This represents 82% of the minimum 1,500 dwellings to come from neighbourhood plans in accordance with Policy 15(d).
- 4.3 The Council are confident that Neighbourhood Plans across the District will allocate sufficient provision to meet the requirements of Policy 15 of the HDPF. The current status of Neighbourhood Plan preparation is at the time of writing highlighted in Appendix A. The schedule demonstrates Neighbourhood Plan preparation is at an advanced stage for many of the local neighbourhood plan groups with the projected final housing number to be delivered through Neighbourhood Plan expected to be approximately 1,800 dwellings. This comfortably exceeds the minimum requirement as stipulated in criterion (d) Policy 15 of the adopted HDPF stipulating at least 1,500 of the overall provision of 800pa over the plan period will be allocated through Neighbourhood Plans and to be in accordance with the settlement hierarchy.
- 4.4 Horsham District Council will continue to closely monitor the progress of Neighbourhood Plans. It follows any housing shortfall across Horsham District from Neighbourhood Plans will be dealt through the emerging new Horsham Local Plan. This is considered a strategic matter for the district council and respectfully not within the remit of this examination.
- 4.5 Bramber Parish Council have made best endeavours to accommodate their housing requirement identified through a robust housing needs assessment

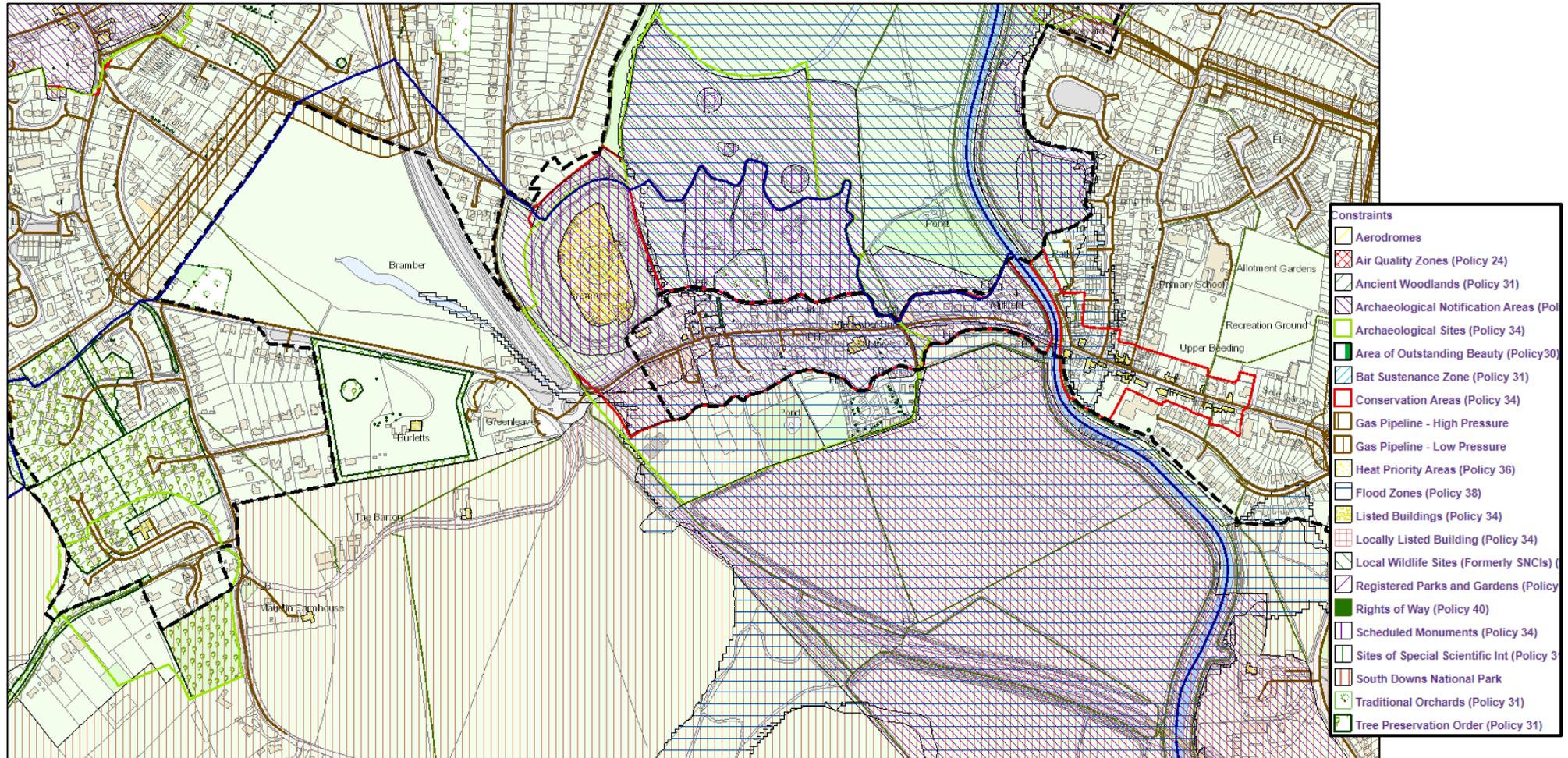
prepared by AECOM, which is widely accepted to be proportionate and accepted methodology in accordance with Planning Practice Guidance¹. The local group has undertaken a robust site assessment analysis of the opportunities available to the parish following a call for sites consultation. It is acknowledged the Parish is heavily constrained with limited opportunities for development. This is highlighted in Plan A (page 7) which identifies the only significant opportunity outside the National Park is a field which separates Bramber from Steyning. It is considered this area known locally as Clay's Field is acknowledged by the parish and local community as an important space between the villages of Steyning and Bramber and discounted for potential housing development on grounds of landscape, heritage and impact on local character.

5.0 Conclusion

Horsham District council considers the Bramber Neighbourhood Development Plan meets the Basic Conditions and is in general conformity with the strategic policies of the adopted HDPF. While the Parish are not allocating land for development their particular circumstances of being heavily constrained has left limited opportunity to pursue a viable and sustainable housing allocation, nevertheless, the plan will proceed to introduce a number of planning policies which will play a key role in guiding development in the parish in a sustainable manner. This decision is supported by a robust evidence base which has been prepared in line with Government guidance on neighbourhood planning.

¹ Paragraph: 105 Reference ID 41-105-20190509
Revision Date: 09 05 2019

Plan A: Bramber Village with Constraints.



Indicative purposes only.

Appendix A: Current Status of Neighbourhood Plans in Horsham District (July 2020)

Current Status of NDP as of 20 July 2020	Neighbourhood Plan Area	Numbers Proposed within Plan
Made	Storrington / Washington	146
Made	Warnham	50
Made	Thakeham	50
Made	Slinfold	77
Made	Shermanbury and Wineham	20
Made	Nuthurst	51
Made	Woodmancote	n/a
Total		394
Referendum (May 2021) Decision Statement issued 30 Jan	Upper Beeding	109
Referendum (May 2021) Decision Statement issued 22 June	Henfield	270
Decision Statement to be finalised Examiner's Report issued 15 May	Southwater	450
Decision Statement to be finalised Examiner's Report issued 18 June	Shipley	n/a
Cumulative Total		1223
Examination in progress. Examination question deadline 20 July	Rusper	n/a
Examination in progress. Examination question deadline 16 July	Bramber	n/a
Cumulative Total		1223
Regulation 16 concludes 12 August	Ashington	225
Regulation 16 concludes 12 August	Billingshurst	n/a
Regulation 16 concludes 4 September	West Grinstead	n/a
Cumulative Total		1448
Regulation 15 (submitted)	Steyning	n/a
Regulation 15 (submitted)	Horsham Blueprint	n/a
Regulation 15 (submitted)	Cowfold	70
Regulation 15 (submitted)	Itchingfield	52 (61) ²
Regulation 15 (submitted 8 July 2020)	Lower Beeding	45 (51) ³
Cumulative Total		1630
Regulation 14 concludes on the 19 July	Rudgwick	n/a
Regulation 14 concludes on the 31 August	Pulborough	263
Cumulative Total		1893
Work in Progress	West Chilts	n/a
Projected Total		1893

² Indicative housing number requested of 61 – the plan allocates 52 with the shortfall to be made up of a windfall policy of 9 dwellings

³ Indicative housing number requested of 51 – the plan allocates 45 with the shortfall to be made up of windfall policy of 6 dwellings

