

Greg Burt
Clerk to PC
Billingshurst Parish Council

Our ref: BNP
Your ref: n/a

Date: 10 August 2020

By Email.

Dear Greg Burt,

Re: Representations to Billingshurst Submission Neighbourhood Plan (Regulation 16)

Thank you for consulting Horsham District Council (HDC) on the Billingshurst Submission Neighbourhood Plan. The District Council is supportive of the Parish Council's work to develop their Neighbourhood Development Plan. We recognise that the Parish Council has undertaken a significant amount of work to reach this particular point and should be commended for all their hard work. The Council's detailed comments on particular policies are listed in the schedule attached to this letter.

We appreciate that the Billingshurst Neighbourhood Planning group has been flexible whilst preparing a plan through the Covid-19 pandemic. HDC appreciate the Neighbourhood Planning Groups communication and acceptance to running a longer consultation period for Regulation 16 (8 weeks), and having a telephone service instead of a deposit location.

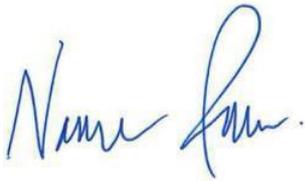
In addition, we wish to make the following general comments to the Submission Billingshurst Neighbourhood Plan (BNP) as part of our response:

1. Billingshurst is identified as a Small Town and Larger Villages in the settlement hierarchy as set out in Policy 3 of the adopted Horsham District Planning Framework (HDPF). There is an expectation that emerging neighbourhood plans are required to accommodate their fair proportion of the minimum 1,500 dwellings to be delivered from Neighbourhood Plans across Horsham in accordance with Policy 15 (4). HDC agrees with the Neighbourhood Planning group's approach to housing in the Neighbourhood Plan. More detail will be given in the matrix to follow, however, from June 2019 Billingshurst Neighbourhood Area had 1,250 dwellings either completed or were under construction as part of a granted planning permission. HDC agree that this figure exceeds any suggestion in the Housing Needs Paper, and Billingshurst have received and exceeded, an appropriate amount of housing for the Horsham District Planning Framework (HDPF) plan period.
2. There is an opportunity for a full or partial review of the Billingshurst Neighbourhood Plan once the Local Plan Review has been through the legislative process and is suitably mature to provide the certainty for local groups to embark on a review of individual plans. The Local Plan Review may increase housing numbers within Billingshurst, and we will continue to keep all of our community groups and neighbourhood plans informed of the Review's progress. This is referenced within the BNP in Chapter 5: Housing.

3. The emerging Billingshurst Plan proposes 16 parcels of land as potential Local Green Spaces (LGS). Horsham District Council supports the principle of Local Green Space designations. However, it is acknowledged that a strict criterion must be satisfied before formal designation and there is the potential that the proposal put forward by the local community will not meet the requirements stipulated by Paragraph 100 of the National Planning Policy Framework. Furthermore, the NPPF is explicit regarding the designation of Local Green Space and as stipulated in Paragraph 99 in the 'The Framework' notwithstanding, the individual merits of a local green space proposal, any LGS proposal should be consistent with the local planning of sustainable development, the provision of homes, employment and other essential infrastructure. Local Green Space should not be employed as a means to stymie development. Local Green Space should endure beyond the end of the plan period and come forward through a neighbourhood plan or local plan review. For information, we have provided this advice to other local community groups, and have also explained that an examiner of the plan will be required to consider if the proposal designation meets the requirements set out by national planning policy and may ultimately recommend alterations or deletion of the site to ensure the plan meets the basic conditions.

Further detailed commentary on individual policies can be found in the accompanying schedule. If you have any further questions regarding this representation or any of the comments submitted by HDC officers, please do not hesitate to contact me or my colleagues at the Specialist Advisory Service at the National Park.

Yours sincerely,



Norman Kwan
Senior Neighbourhood Planning Officer.

**Horsham District Council Comments to the Submission
Billingshurst Neighbourhood Plan (BNP)**

August 2020

NP Paragraph No. / Policy No.	Suggested Change / Comment
General comment	Appreciate the extra effort that has been made by the BNP and Parish Council to format the Neighbourhood Plan by a local graphic designer. The formatting makes the plan easy to read and follow.
1. Introduction – Figure 1.1	Very minor comment, could be beneficial to make the map slightly bigger for those with visual impediments who are looking at a hard copy of the BNP.
1. Introduction – Paragraph 1.6-1.13	This section is well written and sets the scene for plan making in the Billingshurst Parish. Initially my comments were to reflect the Local Plan Review, however this is mentioned in the next section which is very helpful.
1. Introduction – Paragraph 1.14	The Consultation part of the plan could make reference to the accompanying submitted Consultation Statement within this chapter.
1. Introduction – Paragraph 1.15	Useful to mention about the Neighbourhood Plan review and Local Plan Review early on in the BNP. It shows the long term vision for Billingshurst. The only small comment may be that it could have mentioned the potential for additional housing figures for Neighbourhood Plans.
2. Vision and Objectives – paragraph 2.1	The Vision for Billingshurst is clear and well-presented and the group has clearly thought about what kind of place they want Billingshurst to be up to 2031.
Paragraph 2.2	Agree with the connectivity of the BNP Objectives to the issues for Billingshurst in the following paragraph 2.3. The plans objectives cover a range of planning matters and issues.
3. Local Context	Appreciate the way the plan has noted the past of Billingshurst, and its historic features, whilst looking to the present day. Touching on all aspects of Billingshurst such as housing, community facilities, village life, historic context, housing sites, village character, transport etc.
3. Local Context – paragraph 3.29	Paragraph 3.29 sets the scene for the community of Billingshurst, and what kind of people live in the Neighbourhood Area. And how the objectives and issues reflect the population demographic.
4. Spatial Strategy	Paragraphs 4.1 - 4.2 reflect on the HDPF Policy 4: Settlement Expansion and paragraph 4.3 comments on the awareness of the BNP having more than one settlement within the Neighbourhood Area. There is good connection to the HDPF Policy 3: Development Hierarchy, and certain circumstances where housing may be appropriate within the BNP undefined settlements.
4. Spatial Strategy – paragraph 4.4	HDC is pleased to see the incorporation of the paragraph into the BNP. It shows the forward thinking of the Neighbourhood Planning group, and acceptance of sustainable growth for Billingshurst. There is also consideration given to the landscape and capacity of the Low Weald.
Policy BILL1: Billingshurst Built-up Area Boundary	HDC is in support of this policy, and the inclusion of built out sites into the Built up area boundary. The policy conformity section shows the link between local community Objectives, with Spatial Horsham Policy and National NPPF Planning Policies. A good way to show a joined up approach.
5. Housing	Good planning context has been given in paragraphs 5.1 – 5.4. It is important for this iteration of the BNP to be able to show that Billingshurst did carry out a Housing Needs Assessment (HNA). However, it was decided by officers at HDC that the parish had exceeded and accepted over any housing figure that was provided in the HNA (paragraph 5.2: 360 – 380 dwellings), and therefore didn't need to allocate any housing in this iteration of the BNP. Paragraph 5.4 comments on the early review of the Billingshurst Neighbourhood Plan, and to accept a proportionate amount of growth to the Parish. This is a clear

	and helpful way to address the relationship between this Neighbourhood Plan and the Local Plan Review.
5. Housing – Aim 1: Prepare for an early review of the Neighbourhood Plan	Clear and helpful way to show the intent of the future of the Neighbourhood Area in terms of reviewing. Showing distinction from Policy and background text. HDC agree and appreciate this method of transparency from the BNP group.
Policy BILL2: Housing Design and Character	Good policy detail and link to the West Sussex County Council standards. Good vision for use of open green space as part of development. Part B to the policy could link to the Lifetime homes standards in the footnote. This part of policy links back to parish demographic and objectives.
5. Energy Efficiency in Design	Good to see the BNP taking Climate Change to the local level. Good National Policy context in paragraph 5.12 – 5.15. It would be helpful to link to the 'new national technical standards' that is mentioned in 5.15, as done in previous paragraphs.
Policy BILL3: Energy Efficiency in Design	This policy builds on and is in general conformity with HDPF Policy 36: Appropriate Energy Use and Policy 37: Sustainable Construction. Point vii mentions the infrastructure for electric vehicles, it could have been worthwhile to link to the WSCC Electric Vehicle Strategy (https://www.westsussex.gov.uk/roads-and-travel/travel-and-public-transport/travelwise-sustainable-transport/electric-vehicles/) from January 2020. My only comment is whilst HDC is in support of this kind of policy, how does the BNP group see this information being submitted as part of a planning application? Would the group expect a standalone energy report showing materials, energy efficiency etc. Or is this acceptable in the design and access report? Just a comment for consideration.
6. Community Assets and Infrastructure	Again, a slight repeat on an earlier comment, but Figure 6.1 could be slightly bigger for those with visual impediments who are looking at a hard copy of the BNP. It is helpful to show the spread of these facilities on a map within the BNP.
6. Table 6.1	This is a useful table to have in terms of what can be done for the current community facilities. These could also be used in terms of projects for spending CIL money.
Policy BILL4: Provision of Leisure and Recreation Facilities	Small point, may wish to add in some text about appropriate outside lighting techniques in regards to Point A v.
Policy BILL5: Burial Space	Innovative policy for a Neighbourhood Plan to cover. No comments on policy context.
Policy BILL6: Integrated Infrastructure	No comments on policy context.
7. Economy	Paragraph 7.1 sets good policy context. Figure 7.1 is a useful tool to visualise the layout of shopping / village centre within Billingshurst. It links nicely to paragraphs 7.5 sub sequential bullet points (car parking, pedestrian safety, expansions) etc.
Policy BILL7: Retaining and Enhancing the Vitality of Billingshurst Village Centre	Support of Point A of Policy and is in general conformity with HDPF Policy 12: Vitality and Viability of Existing Retail Centres (in particular point 2a). The HDPF also notes Billingshurst as a secondary centre as mentioned in the BNP. Part C-E of the Policy relates to temporary uses within the village centre. HDC is in general support of the concept, and appreciates the extra measures in terms of detrimental impact e.g. amenity, noise etc.
Policy BILL8: Public Realm and Movement in Billingshurst Centre	HDC is in support of this policy as it further expands upon HDPF Policy 12 Point 2b.
Policy BILL9: Re-use of Historic Buildings in Billingshurst Village Centre	HDC is in general support of this policy, however as mentioned/alluded to in the Policy; historic buildings have specific requirements in terms of redevelopment. All development will likely require Listed Building consent, along with a possible planning application. Historic Buildings are a big part of the Local Character of communities so it is important any re-use is sympathetic to this.

Aim 3: Explore opportunities to part-pedestrianise Billingshurst High Street	Interesting concept to explore through the BNP. If the Parish Council requires any assistance to set up meetings etc or would like a representative present from HDC.
Policy BILL10: Flexible Workspaces	HDC is in support of this policy and is generally in conformity with HDPF Policy 7: Economic Growth. Especially in the current Covid-19 pandemic, boosting our local economies is extremely important. Flexibility for start-up / smaller businesses is a promising idea to promote through an NDP. Only comment would be on what kind of documentation would the Parish Council expect to be included within a planning application to prove the status of the start-up/incubator business.
Policy BILL11: Tourism-related Development and Provision of Tourist Accommodation	A point that could be added to Point iii of this policy, is possible viability assessment that proves that other options within the BUAB have been explored. As a general point HDC supports the development and promotion of tourism accommodation to boost the local economy, and is in line with Policy 7 Point 6.
8. Transport and Movement	Paragraph 8.3 sets the distinction between what the BNP can and cannot do, this is helpful comment to make for readers of the Neighbourhood Plan that may be unaware of its limitations.
Policy BILL12: Protection and Enhancement of Key Movement Routes	Part A of this policy is in general conformity with HDPF Policy 33: Development Principles, in particular Point 8. Ease of movement is a key factor in the performance of the local economy, and can add to the health and wellbeing of residents and people who work in the Neighbourhood Area. Figure 8.1 could again be slightly bigger as the names of the locations appear quite small. As it is already enlarged in Figure 8.2 and 8.3, 8.1 could possibly be deleted. Also if the working group did any evidence to support this policy, it could be beneficial to link this within the BNP as a footnote.
Policy BILL13: Public Car Parking	As a general point, there could be an 'Aim' added for this policy, in regards to exploring the possibility of the existing train station being redeveloped to a multi-storey car park (as mentioned in paragraph 8.8.) Car parking may be under control by the District or County Authority (or private ownership) and may be out of the control of the BNP. However, the context of future-proofing by adding fast charge electric car parking (Part C ii) and bicycle parking is welcomed.
Policy BILL14: Residential Parking Provision	As a general comment, the current parking standards for Horsham District are the updated June 2020 standards from West Sussex County Council (WSCC) - https://www.westsussex.gov.uk/media/1847/guidance_parking_res_dev.pdf It is understood by the BNP that the WSCC standards must be used (Part B of the policy). HDC supports the principle of this policy.
9. Local Green Spaces	The emerging Billingshurst Plan proposes 16 parcels of land as potential Local Green Spaces (LGS). Horsham District Council supports the principle of Local Green Space designations within Neighbourhood Plan. There is a strict criterion must be satisfied before formal designation and there is the potential that the proposal put forward by the local community will not meet the requirements stipulated by Paragraph 100 of the National Planning Policy Framework. A comment would to link the two LGS documents somewhere in this policy.
Policy BILL15: Local Green Spaces	HDC is in support of Local Green Spaces Policies, and HDC also acknowledge that none of the proposed LGS sites are proposed SHEELA sites as part of the Local Plan Review. These site can be found in the SHEELA report from 2018 - (https://www.horsham.gov.uk/_data/assets/pdf_file/0017/66221/SHELAA-2018-FINAL-v7-App1MSDC.pdf) And accompanying SHEELA Map for Billingshurst (https://www.horsham.gov.uk/_data/assets/pdf_file/0010/66259/MAP_Billingshurst2018red.pdf). HDC is in support of the Local Green Spaces Allocated as part of Policy 15, and believe that all but one meets the criteria set in Paragraph 100 of the NPPF. They

	<p>are designated for a range of reasons, such as recreation, sport (Bowling Alley) and wildlife.</p> <p>We have concerns over LGS 1. Bypass Path fulfilling the criteria for an LGS. Although it may be of particular importance and value to the BNP and community, and 'linear paths' form a crucial part of green infrastructure, there is doubt whether it fully qualifies as a LGS.</p>
Paragraph 9.5	HDC is supportive of the inclusion of Biodiversity net gain within the BNP. Biodiversity net gain is mentioned in the update to the NPPG Natural Environment Guidance paragraph 006 in regards to multi-functioning green spaces, ecological connectivity and multifunctional sustainable drainage.
Policy BILL16: Multi-value Sustainable Drainage Systems	HDC is in support of this policy. Part A in particular is in general conformity with HDPF Policy 35: Climate Change Point 2 and 4. Supportive of Part B and the inclusion of Biodiversity within the Policy (NPPG Natural Environment guidance July 2019). It could be worthwhile to link BILL 16 Part C in Policy BILL2: Housing Design and Character.
Policy BILL17: Views to St Mary's Church	After meeting the Neighbourhood Planning group, it was clear that St Mary's Church is a key prominent building and feature within the Neighbourhood Area. My only comment on this policy is where the Parish Council feel the biggest threat of compromising the view comes from. If this was shown on a map that could be put on an appendix, even better. However, as the policy stands it is supported by HDC.
Monitoring and Implementation	Very clear and concise.
Non-Policy Actions	Very interesting concept to keep note of non-policy actions that are important to the Neighbourhood Planning group. These are also measures that could be looked at through CIL, or could be incorporated into future iterations of the Neighbourhood Plan.