



**Horsham
District
Council**

Representation Form

Billingshurst Neighbourhood Plan 2019-2031

The Neighbourhood Planning (General) Regulations 2012 (as amended) - Regulation 16

Billingshurst Neighbourhood Development Plan

In light of recent announcements regarding COVID-19, Horsham District Council to reviewed its protocols regarding the consultation process for neighbourhood plans, a number of which were published for public consultation shortly before the government imposed the nationwide lockdown.

In order to continue to progress neighbourhood plans, we have made a decision to continue with the consultation process with measures we feel are in accordance to the government guidelines.

Billingshurst Parish Council has prepared a Neighbourhood Development Plan (BNP). The Plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. In accordance with Regulation 16 of the Neighbourhood Planning Regulations 2012 (as amended), the BNP and associated documents will go out to consultation:

Wednesday 17 June to Wednesday 12 August 2020 for 8 weeks inviting representations on the draft submission plan, basic conditions statement, consultation statement and the Strategic Environmental Assessment (SEA) screening opinion. Supporting Background Papers are for information purposes only.

Copies of the BNP Neighbourhood Plan and supporting documents are available to view on the Horsham District Council's website:

<https://www.horsham.gov.uk/planningpolicy/planning-policy/currentconsultations>

Documents will not be made available in deposit locations due to the current COVID-19 pandemic. If local residents have difficulty in engaging online we have provided a telephone number and email address below. Members of the public are encouraged to leave their details for an officer to contact them back if they need further information.

Email: neighbourhood.planning@horsham.gov.uk – SAS@southdowns.gov.uk

Telephone: 01403 215398

All comments must be received by Midnight on Wednesday 12 August 2020

There are a number of ways to make your comments:

1. Please use the above web address above to make your representation online ; or
2. Complete this form and email it to: neighbourhood.planning@horsham.gov.uk ; or
3. Print this form and post it to: Neighbourhood Planning Officer, Horsham Council, Parkside, Chart Way, North Street, Horsham, RH12 1RL

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by Horsham District Council in line the Data Protection Act 1998 and General Data Protection Regulations. Horsham District Council will process your details in relation to this preparation of this document only. For further information please see the Council's privacy policy: <https://www.horsham.gov.uk/privacy-policy>

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	[REDACTED]
Address	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	Barton Willmore (on behalf of Reside Developments Ltd)
Position (if applicable)	Planner
Date	07/08/2020

PART B

To which part in the plan does your representation relate?

Paragraph Number:	See enclosed representations on Chapters 1, 2, 5, 6, 7, 8.	Policy Reference:	BILL 2 BILL 3 BILL 4 BILL 5 BILL 6 BILL 7 BILL 8 BILL 9 BILL 10 BILL 11 BILL 12
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support

Support with Modifications

Object

Comment

Please give details of your reasons for support/opposition, or make other comments here:

- Chapter 1 – The BNP should be clear as to whether its aim is to set the context of future HDC local plan allocations and should provide clarity over the need for a trigger for a review should the local plan defer and element of housing requirement to neighbourhood plans.
- Chapter 2 – The key objectives should be reviewed to reflect the relation of the BNP to the emerging HDC local plan.
- Chapter 5 – It is likely that district wide housing requirements will increase and the emerging local plan will seek to meet this need in a sustainable way, including through further allocations at Billingshurst. The ambition for homes to meet the needs of the ageing population and young households, as well as the demand for private rented accommodation, is noted.
- Chapter 5 – It may be beneficial to consider the preparation of a design code or guide as supplementary documents to guide discussions on design with applications. It would be useful to understand whether the Billingshurst Parish Design Statement (BPDS) has been reviewed in light of the design points identified in the engagement process.
- Policy BILL2 – Reside support the need to provide housing for the elderly. However, the BNP should not specify the form of provision nor seek to impose a minimum percentage requirement. Flexibility on dwelling typology is required.

- Policy BILL3 – It is questioned whether a specific policy on energy is required in the BNP as the emerging local plan will set a strategic or district wide approach. The reference to on-site energy generation is not necessary, and will not be effective or viable for small scale developments.
- Policies BILL4 to BILL12 – Reside looks forward to engage with the community to better understand the priorities of the community and how development can contribute in the context of the relevant statutory provisions.
- Policies Map – the existing Built Up Area Boundary (BUAB) as shown in the BNP does not reflect the adopted BUAB in the HDPF, and includes land at Kingsfold Close and land to the north of Windmill Place which does not fall within the adopted BUAB. The existing BUAB as shown in the BNP should be amended to reflect the correct and adopted BUAB.
- Appendix A – The commentary relies heavily upon the 2011 census which is now some years out-of-date, as are a number of the evidence base documents. The emerging local plan will generate an update in the assessment of need which out to trigger a new assessment of local need.

Reside Developments Ltd object to the BNP in its current form on the basis that it fails to clarify its role in relation to the allocation of housing sites and its relationship with the emerging local plan; on the basis that Policy BILL2 should not specify the form of elderly accommodation provision nor impose a minimum percentage requirement; and on the basis that Policy BILL3 is not necessary.

Please see enclosed 'Billingshurst Neighbourhood Plan Regulation 16 Consultation – Representations' document for full comments.

What improvements or modifications would you suggest?

- Chapter 1 – The BNP should be clear as to whether its aim is to set the context of future HDC local plan allocations and should provide clarity over the need for a trigger for a review should the local plan defer and element of housing requirement to neighbourhood plans.
- Chapter 2 – The key objectives should be reviewed to reflect the relation of the BNP to the emerging HDC local plan.
- Chapter 5 – It may be beneficial to consider the preparation of a design code or guide as supplementary documents to guide discussions on design with applications. It would be useful to understand whether the Billingshurst Parish Design Statement (BPDS) has been reviewed in light of the design points identified in the engagement process.
- Policy BILL2 – Reside support the need to provide housing for the elderly. However, the BNP should not specify the form of provision nor seek to impose a minimum percentage requirement. Flexibility on dwelling typology is required.
- Policy BILL3 – It is questioned whether a specific policy on energy is required in the BNP as the emerging local plan will set a strategic or district wide approach. The reference to on-site energy generation is not necessary, and will not be effective or viable for small scale developments.
- Policies Map – the existing Built Up Area Boundary (BUAB) as shown in the BNP does not reflect the adopted BUAB in the HDPF, and includes land at Kingsfold Close and land to the north of Windmill Place which does not fall within the adopted BUAB. The existing BUAB as shown in the BNP should be amended to reflect the correct and adopted BUAB.

Please see enclosed 'Billingshurst Neighbourhood Plan Regulation 16 Consultation – Representations' document for full comments.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

Do you wish to be notified of the local planning authority's decision under Regulation 19 of the Neighbourhood Plan (General) Regulations 2012 in relation to the Billingshurst Neighbourhood Development plan?

Please tick here if you wish to be to be notified:

BILLINGSHURST NEIGHBOURHOOD PLAN**REGULATION 16 CONSULTATION – REPRESENTATIONS**

These representations are submitted on behalf of Reside Developments Ltd (Reside). Reside control land to the east of Billingshurst which it is promoting through the emerging Horsham District (HDC) local plan, with the regulation 19 consultation expected shortly. Given the scale of development proposed, Reside would also wish to promote its land interests through the Billingshurst Neighbourhood Plan (BNP), should the BNP seek to allocate housing sites.

As drafted, it is noted that the Billingshurst Neighbourhood Plan (BNP) has been prepared in the context of the adopted Horsham District Planning Framework (HDPF) (adopted November 2015) and recognises that the preparation of the local plan would trigger an early review of the BNP (assuming of course that it is adopted or 'made' at that time).

Reside recognise the effort and commitment of the community in bringing forward a neighbourhood plan and assembling the evidence base documents. The BNP cites the existing level of housing commitments (stating that these amount to 1250 homes) and argues that Billingshurst has met its own identified needs as well as making a contribution to strategic needs. As a Small Town / Larger Village settlement (as identified in the HDPF), Billingshurst will continue to make a contribution to meeting wider or 'strategic' needs as determined through the emerging local plan. The challenge for the BNP is to set out a policy basis for the local needs of the neighbourhood area to be met as part of this wider strategic function as well as the form of development. At the same time, the BNP should not seek to duplicate existing HDPF policies or seek to address matters that are addressed through other legislative procedures such as the building regulations.

Our concern is that given the stage reached by the emerging local plan, policies in the neighbourhood plan could be rendered out of date and the local plan will certainly take precedence over the BNP in the event of any conflict in policy as per 3 of the NPPF.

That said, if the aim of the BNP is to stay silent on housing allocations, i.e. as inferred at para 3.23, the BNP can set a context and strategy for the consideration of additional allocations and the form of development in so far as it is consistent with the future local plan (as adopted).

Our comments are made in this context.

Chapter 1 (Introduction):

Para 1.16 sets out the expectation of an early review in light or in response to the adoption of the HDC local plan. The principle matter that will arise from the local plan will be the allocation of additional sites. If the aim of the BNP is to set the context of such future allocations in the local plan then it should state as such. Likewise, if the local plan defers an element of the housing requirement to neighbourhood plans, which may include Billingshurst, then the assumption is that the BNP would undertake a review which may be partial.

The BNP should be clear as to the role of the BNP in such circumstances so that the community has certainty and clarity over the need or trigger for a review and the weight to be attached in such circumstances if the BNP is made in its current form in advance of the local plan.

Chapter 2 (Vision & Objectives):

The BNP usefully sets out a number of key objectives. We would suggest that these are revisited in light of the above comments and the relationship of the BNP to the emerging HDC local plan.

Chapter 5 (Housing):

The plan identifies the contribution made to date by existing permissions and allocations in the HDPF in meeting strategic (district wide) housing needs and that the scale of development accommodates the specific local needs identified.

District wide housing requirements will be reviewed and set through the emerging local plan. It is likely that the requirement will increase (subject of course to any changes in government policy and the consideration of unmet need from elsewhere through the exercise of the duty to co-operate). Billingshurst is a sustainable location for development which is recognised as a Small Town / Large Village settlement. The local plan will seek to meet this need in a sustainable way and it is likely that further allocations will be proposed at Billingshurst.

This will most likely result in amendment to the Build Up Area Boundary (BUAB).

Any further development will provide the opportunity for discussions as to mix and the form of the development. We support the commentary at para 4(f) of the Housing Needs Study that the market is best suited to meet the needs for market dwellings and that the BNP should be permissive. We note the ambition for homes to meet the needs of the ageing population and also young households, together with continued demand for private rented.

The ambition to secure high quality design is laudable but we are not convinced that the policy as drafted with the extensive discussion as to design issues is effective. It may be more beneficial to consider the preparation of a design code or guide as a supplementary document which can then be used as the basis for discussion with applicants. Para 5.8 refers to the design 'points' identified through the engagement process which appear to be in addition to the Billingshurst Parish Design Statement (BPDS). It is unclear whether these are in addition to the BPDS which is referenced in policy BILL1. It would be useful to understand whether the BPDS has been or will be reviewed in light of the comments received through the engagement process.

Policy BILL2: Reside support the need to provide for the needs of the elderly, both through Class C2 and Class C3 housing. Reside has successfully provided bungalows as part of a mixed tenure scheme. The BNP should not and ought not however specify the form of provision nor seek to impose a minimum percentage requirement. The typology of dwellings that can contribute to meeting such needs is wide and varied and flexibility is required. Reside therefore object to Policy BILL2 as currently drafted.

Policy BILL3 (energy): We question whether the BNP needs a specific policy. The emerging local plan will set a strategic or district wide approach as well as government guidance. Such guidance and technology is advancing all the time and in large part, building performance is a matter for building regulations. Reside therefore object to Policy BILL3 on the grounds that is not necessary.

The reference to on-site energy generation is likewise not necessary. With technology advance, not least in the National Grid and decarbonisation strategy, on site generation, through say CHP with a local heat network, may not be the most appropriate and cost-effective means. It will certainly not be effective or viable for smaller scale developments and is often only possible for developments in their thousands.

Chapter 6 (Community Assets and Infrastructure), Chapter 7 (Economy) and Chapter 8 (Transport):

Policies BILL4 to BILL12: The BNP usefully identifies a number of infrastructure challenges and priorities, including recreation and leisure as well as improvements to the high street and other facilities. New development can play an important role, in bringing new younger families into the community, increasing demand and spend on local facilities as well as generating CIL

and s106 monies to support the ambitions of the BNP. Reside looks forward to engaging with the community through the promotion of its land interests to understand better the priorities of the community and how development can contribute in the context of the relevant statutory provisions.

Policies Map:

We note that the policies map does not seek to identify any housing allocations and identifies the BUAB to include the consented and allocated sites through the HDPF.

It is noted that the existing BUAB as shown in the BNP does not reflect the adopted BUAB in the HDPF, and includes land at Kingsfold Close and land to the north of Windmill Place which does not fall within the adopted BUAB. The existing BUAB as shown in the BNP should be amended to reflect the correct and adopted BUAB.

Appendix A:

Whilst the commentary is interesting, it appears heavily reliant upon the 2011 census which is now some years out-of-date. Likewise, a number of the evidence base documents are a number of years old. The emerging local plan will generate an update in the assessment of need which ought to trigger a new assessment of local need.

Summary

In light of the above, Reside Developments Ltd object to the BNP in its current form on terms set out above including that it fails to clarify its role in relation to the allocation of housing sites and its relationship with the emerging local plan; on the basis that Policy BILL2 should not specify the form of elderly accommodation provision nor impose a minimum percentage requirement; and on the basis that Policy BILL3 is not necessary.