

Ref: GA/RW/05619/L004

12 August 2020

Neighbourhood Planning Officer
Horsham Council
Parkside
Chart Way
North Street
Horsham
RH12 1RL

By E-mail: neighbourhood.planning@horsham.gov.uk

Dear Sir/Madam

Billingshurst Neighbourhood Plan 2019-31 Submission Stage (Regulation 16) Consultation

I write on behalf of our clients Dunmoore to provide our representations to the Billingshurst Neighbourhood Plan. By way of background we have been acting on behalf of Dunmoore in respect of their interests in Billingshurst since 2016. During that time we have engaged with the Parish Council in promoting Dunmoore's land north of Hilland Farm for a commercial scheme offering almost 20,000sqm business space a petrol filling station (PFS) and drive through coffee unit. The scheme was granted planning permission in June 2019 (HDC Ref. DC/18/2122).

Phase 1 of the development which benefits from detailed permission is well progressed as are the access junction works on the A29 to serve the whole development. Occupations on phase 1 are scheduled to take place later this year, with work expected to start on phase 2 shortly.

Over the three year period we have been working with Dunmoore we have played an active part in the Neighbourhood Plan process, attending numerous Neighbourhood Plan working party meetings and taking an active part in the consultation workshops used to inform the vision and objectives for the plan. Representations were made on behalf of Dunmoore to the Regulation 14 public consultation on the Neighbourhood Plan.

Dunmoore, through its landholding and committed development to the north of Billingshurst is a long-term stakeholder in Billingshurst and has a vested interest in its successful future. It is in this context that the following comments are made.

2 Vision and Objectives

Support is expressed for the ambition expressed under paragraph 2.1 that:

"...The High Street and other businesses will be thriving and local employment opportunities will have increased in part by supporting new premises but also wider services to meet the needs of the enlarged population."

Support is similarly expressed to Neighbourhood Plan objective 4, albeit in a modified form, for the reasons explained below.

Consistent with our Regulation 14 representations we consider that modified wording would better address issues relating to the datedness of existing employment accommodation and its unsuitable location causing highway concerns, as expressed in representations made during the emergence of the Neighbourhood Plan, as follows:

- The proximity of the existing industrial estates to the centre of the village and the railway crossing creates significant issues in terms of HGV movements and safety at the railway crossing and outside the primary school;¹
- Moving the industrial estates to the edge of the village with access off the A272/A29 would provide significant benefits, particularly if housing were to replace it;²
- 69% of those questioned considered existing business areas would be better located elsewhere in Billingshurst;³
- Views have been expressed at public consultations and group meetings of a desire for alternative employment sites being available close to the village but with direct access to the A29/A272, thereby removing HGV's and other traffic from residential streets. The developing Local Plan could support and incentivize this ambition.⁴

This is also referenced in the submission version Neighbourhood Plan, with paragraph 3.26 stating:

"Traffic through the village is a major concern. The presence of the industrial estates in the south of the village mean that many HGV's travel through the centre of the village, including passing the primary and secondary schools and along the High Street. This significantly reduces the quality of the environment and safety generally for residents, pedestrians and cyclists."

The Dunmoore scheme offers the opportunity to fulfill part of this equation but the objectives should be modified to better address the concerns which have been expressed and move employment sites to accessible locations at the edge of Billingshurst, such as that at Hilland Farm. Objective 4 should be modified as follows:

Modified Objective 4 (changes shown in **bold**)

*"Strengthen, support and promote local economic activity in all retail, industrial, commercial and professional activities and ensure they are focused in appropriate areas of the Parish. **Support is expressed for the relocation of commercial uses close to the train station to accessible employment sites at the edge of Billingshurst with direct access to the A29.**"*

Issues d & i, as expressed under paragraph 2.3 of the Neighbourhood Plan are considered to represent matters of particular importance for the future of Billingshurst, highlighting respectively:

- d. The need to improve retail provision; and
- i. The shortfall which exists for employment floorspace with a demand for fit for purpose business space, including starter units and low cost, flexible workspaces.

¹ Paragraph 2.20, Billingshurst NP Option Development Workshops Final Report February 2018

² Paragraph 2.21, Billingshurst NP Option Development Workshops Final Report February 2018

³ Overview of NP Business Consultation Qu's 11 & 13

⁴ Respondent no. 115, Billingshurst NP Working group to Horsham District Local Plan Review, Issues and Options Consultation 2018

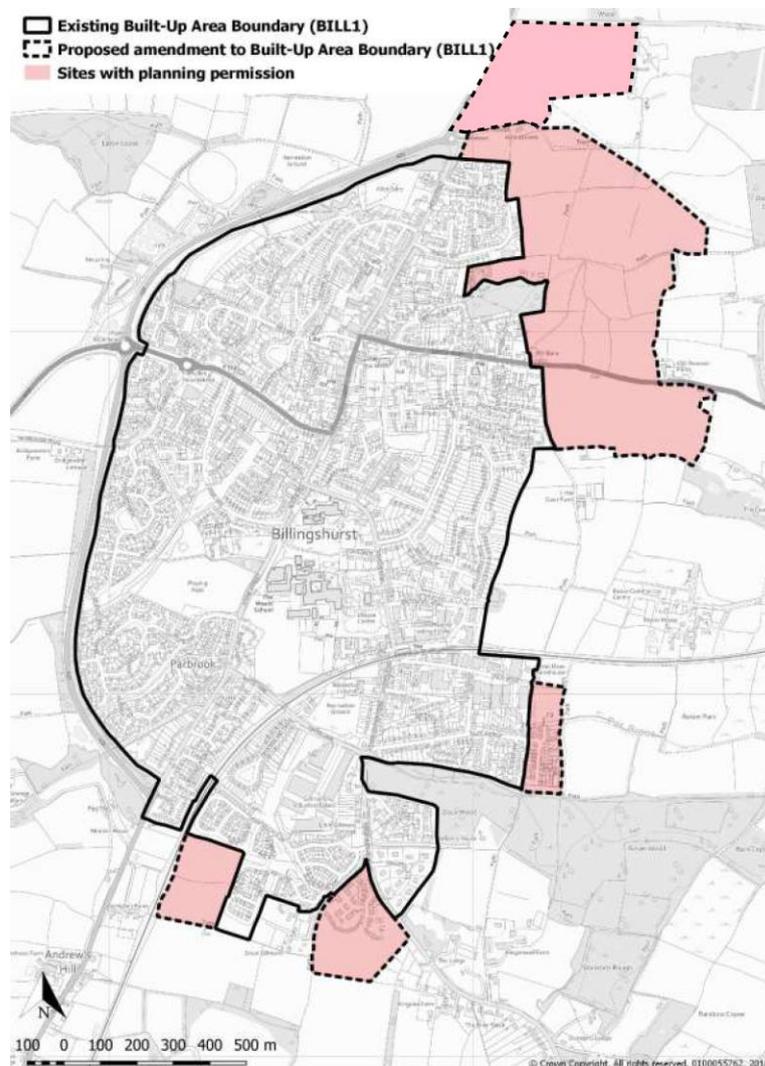
As developers of a committed mixed-use commercial development at the edge of Billingshurst, with good links and in close proximity to the High Street, Dunmoore are well placed to support and help realize the vision and objectives of the Plan. In turn it is important that the Neighbourhood Plan supports the delivery of this important development for Billingshurst.

4 Spatial Strategy

Paragraph 4.7 states that:

"Policy BILL1 of the Billingshurst Neighbourhood Plan proposes an amendment of the BUAB in order to encompass those sites that have been completed or with planning permission. The extent of the proposed new BUAB and the location of these sites are shown in Figure 4.1."

To make this statement factually correct Figure 4.1 needs to be updated to extend the BUAB around the Dunmoore site north of Hilland Farm, as shown below. This provides an expansion of the BUAB which is contiguous with the boundary to the south including the eastern expansion area.



As explained above the Hilland Farm site benefits from an extant planning permission (DC/18/2122), as modified by permission ref's: DC/19/1365 & DC/20/0171. The amendment will also correct the pink notation on the key

which states: 'sites with planning permission.' The same changes need to be carried forward on the policy maps in Section 12.

This important change to the plan is necessary to best support the delivery of this important permitted scheme for Billingshurst. It is also needed to satisfy basic conditions⁵ a, d and e.

Following a comprehensive assessment at application stage the permitted scheme was shown to represent sustainable development needed to support the future unmet needs for commercial floorspace and consistent with national policy to create conditions in which business can invest, expand and adapt. As explained at paragraph 4.6 of the Neighbourhood Plan it is also consistent with HDPF policy 4.

To do otherwise would be inconsistent with the plans treatment of other permitted schemes which have been brought within an extended BUAB and the important role which Neighbourhood Plans play in shaping, directing and delivering sustainable development.⁶

Consistent with our Regulation 14 representations it is considered that to be consistent with basic condition (a) a further bullet point should be added under part b of Policy BILL1, as follows:

v. The scale and impact of the development is acceptable and meets an identified local need which cannot be suitably accommodated within the BUAB

This will introduce greater flexibility called for under paragraph 81 of the NPPF. This is considered of importance given the datedness of the current HDPF (2015), against which the Neighbourhood Plan aligns itself (paragraph 1.8 of the Neighbourhood Plan). The HDPF includes a housing target which equates to 800 dwellings per annum (dpa). By contrast the emerging Local Plan has consulted on projected housing needs of between 1,000 and 1,400dpa⁷, representing a significant uplift in development needs across the plan period, a proportion of which will inevitably fall on Billingshurst.

This flexibility is considered important in ensuring that when the replacement Local Plan is adopted (currently projected for April 2022), the Neighbourhood Plan will not be rendered out of date to a new Local Plan.

7 Economy

POLICY BILL7: RETAINING AND ENHANCING THE VITALITY AND VIABILITY OF BILLINGSHURST VILLAGE CENTRE

Following the recent changes to the Use Classes Order, to be effective from 1 September 2020, part B of the policy will need to be re-written to acknowledge and accept the greater flexibility introduced by the new Class E, which groups current uses A1, A2, A3, B1a, B1b, B1c, D1 (clinic, health centres, creches, day nurseries, day centre) and D2 (gyms, indoor recreations not involving motorised vehicles or firearms) in the new Class E.

Consistent with the objective of the Neighbourhood Plan to support economic activity in all retail, industrial, commercial and professional activities the policy should be expanded to consider larger format Class E (Commercial, business and service) uses which cannot be physically accommodated in the designated primary shopping area, as follows:

Larger Format Proposals

E. In considering larger format proposals for Class E uses which cannot be accommodated in the primary shopping area preference will be given to accessible sites well connected to the village centre which are best able to deliver linked benefits to the existing centre and provide for sustainable patterns of travel.

⁵ Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990

⁶ NPPF, Paragraph 29

⁷ Horsham District Local Plan 2019-36 Regulation 18 Consultation (February 2020), Strategic Policy 14 – Options for Housing Growth

This policy change will help achieve sustainable development and accord with national policy consistent with basic conditions a and d.

Support is expressed for: **POLICY BILL11: TOURISM-RELATED DEVELOPMENT AND PROVISION OF TOURIST ACCOMMODATION**

8 Transport & Movement

Similar to comments made in respect of the policy maps needing to be updated, to capture the committed development at Hilland Farm, it is also necessary for figures 8.1 and 8.2 to be updated. These need to show:

- The extent of the land north of Hilland Farm which has planning permission;
- The committed key movement routes demonstrating how the network will grow in the future;
- The route of the pedestrian/cycle link between Hilland Roundabout and the land north of Hilland Farm;
- The bus stop improvements secured as part of that permission;
- The key movement routes being brought forward as part of the east of Billingshurst expansion area, including the route of the relief road linking the A272 with the Hilland Road Roundabout.

This will avoid the Neighbourhood Plan being rendered out of date at an early stage given that these developments are well advanced on the ground.

I trust that the content of this letter is clear and will be considered as the neighbourhood plan progresses. In the event you should have any queries or require any additional information please do not hesitate to contact me.

[Redacted signature block]

Associate

Armstrong Rigg Planning

Direct Line: [Redacted]

Mobile: [Redacted]



**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

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

Please see enclosed letter, which provides comments as summarised below:

2 Vision and Objectives

Support is expressed for the ambition expressed under **paragraph 2.1** that:

"...The High Street and other businesses will be thriving and local employment opportunities will have increased in part by supporting new premises but also wider services to meet the needs of the enlarged population."

Objective 4 should be modified for reasons described below:

Consistent with our Regulation 14 representations we consider that modified wording would better address issues relating the datedness of existing employment accommodation and its unsuitable location causing highway concerns, as expressed in representations made during the emergence of the Neighbourhood Plan, as follows:

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Policy BILL1 and policies map need to be modified for the following reasons:

4 Spatial Strategy

Paragraph 4.7 states that:

"Policy BILL1 of the Billingshurst Neighbourhood Plan proposes an amendment of the BUAB in order to encompass those sites that have been completed or with planning permission. The extent of the proposed new BUAB and the location of these sites are shown in Figure 4.1."

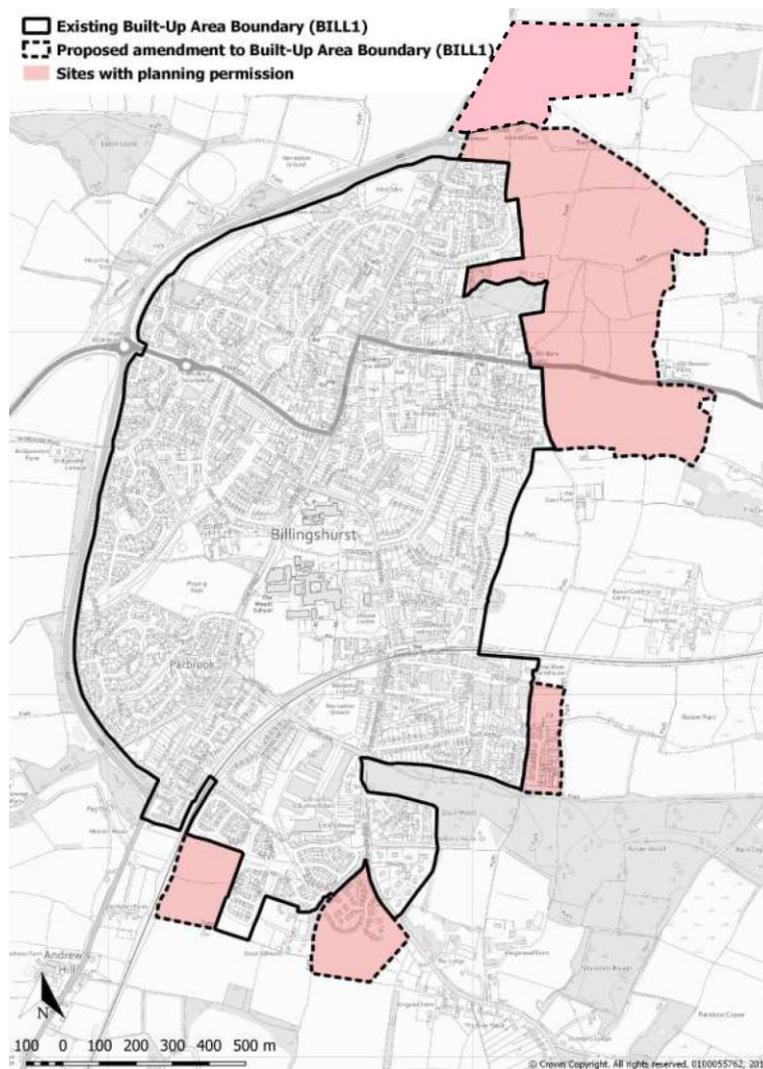
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This flexibility is considered important in ensuring that when the replacement Local Plan is adopted (currently projected for April 2022), the Neighbourhood Plan will not be rendered out of date.

Policy BILL7 needs to be modified as described below:

POLICY BILL7: RETAINING AND ENHANCING THE VITALITY AND VIABILITY OF BILLINGSHURST VILLAGE CENTRE

Following the recent changes to the Use Classes Order, to be effective from 1 September 2020, part B of the policy will need to be re-written to acknowledge and accept the greater flexibility introduced by the new Class E, which groups current uses A1, A2, A3, B1a, B1b, B1c, D1 (clinic, health centres, creches, day nurseries, day centre) and D2 (gyms, indoor recreations not involving motorised vehicles or firearms) in the new Class E.

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This policy change will help achieve sustainable development and accord with national policy consistent with basic conditions a and d.

Policy BILL11

Support is expressed for: **POLICY BILL11: TOURISM-RELATED DEVELOPMENT AND PROVISION OF TOURIST ACCOMMODATION**

Figures 8.1 and 8.2 need to be modified for the following reasons:

8 Transport & Movement

Similar to comments made in respect of the policy maps needing to be updated, to capture the committed development at Hilland Farm, it is also necessary for figures 8.1 and 8.2 to be updated. These need to show:

- The extent of the land north of Hilland Farm which has planning permission;
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This will avoid the Neighbourhood Plan being rendered out of date at an early stage given that these developments are well advanced on the ground.

⁷ Horsham District Local Plan 2019-36 Regulation 18 Consultation (February 2020), Strategic Policy 14 – Options for Housing Growth

What improvements or modifications would you suggest?

Please see above and enclosed covering letter.

(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: