

Lower Beeding Parish Council
Parish Clerk
Bede Cottage
Church Lane,
Plummers Plain
RH13 6LU

Our ref: LBNP/Reg 14
Your ref: n/a
Date: 11 February 2021

By Email.

Dear Peter,

Re: Representation to Lower Beeding Submission Neighbourhood Plan (Reg 16)

Thank you for consulting Horsham District Council (HDC) on the Lower Beeding Submission Neighbourhood Plan and presenting an opportunity to comment on the plan. We would like to congratulate the Parish Council on reaching this significant milestone in the process which demonstrates the commitment of the community to engage with the neighbourhood plan process. The following are officers' comments.

This letter sets out the following key points of our representations. Our representations follows on from the comments made at the pre-submission (Regulation 14) consultation and at earlier stages in the process through the HDC 'healthcheck'.

There is an expectation in the adopted Horsham District Planning Framework (HDPF) that in addition to any sites allocated specifically in the adopted HDPF, emerging neighbourhood plans will be required to accommodate an appropriate proportion of the minimum 1,500 dwellings to be delivered from Neighbourhood Plans across Horsham district as stated in Policy 15 (4) of the HDPF. The Council welcomes the submitted neighbourhood plan is proposing to make new housing allocations to count towards this requirement.

Lower Beeding is identified as a 'small' village in the settlement hierarchy by Policy 3 of the adopted HDPF. It therefore acknowledged Lower Beeding as a sustainable settlement, which is able to accommodate some development of an appropriate scale to the location. The District Council provided the steering group with an 'indicative' housing target of 51 dwellings over the plan period following a request made by the Parish Council. The emerging neighbourhood plan is promoting four allocations comprising the delivery of 45 dwellings over the plan period with the remaining shortfall of six dwellings to come from windfall allowance for the parish during the plan period. This approach is consistent with guidance from the Planning Practice Guidance¹ which states neighbourhood plans may meet their identified housing need through a combination of allocations and windfall development. We note Policy 10 Windfall

¹ Paragraph: 097 Reference ID: 41-097-20190509

Development has been included in the submission plan and also welcome the clarification provided in paragraph 5.52, which states any windfall development above the four units required for the Parish will contribute to the wider District allowance and be recorded accordingly.

We have previously made comments regarding access arrangements in relation to Policy 9; Land at Glayde Farm. It appears from the submitted Consultation Statement, that the Highway Authority has not made specific representations regarding this site. It is unclear whether they agree in principle to the access arrangements. Nevertheless, we'd wish to reiterate that any technical solution should not prejudice the setting and integrity of local heritage assets nearby namely the Grade II Listed Holy Trinity Church.

The District Council has started its review of the HDPF to accord with new NPPF, housing delivery test and the standard methodology. In Horsham District, different neighbourhood planning groups are at different stages of plan preparation. As a result, the Local Plan Review will affect parishes in different ways and the District Council has recognised this. Horsham District Council has engaged with all the parishes to ensure our work streams are not in conflict and are aligned. Whilst the pandemic has presented a challenge for plan-making, it is expected many neighbourhood plans will be made in 2021. The District Council has therefore sought confirmation from local groups to commit to a full or partial review of their neighbourhood plan once the District Council has completed a review of its Local Plan. We therefore welcome paragraph 9.5 of the LBNP which provides a commitment to review the LBNP to take account of any revised housing numbers emerging from the Local Plan Review.

If you have any further questions regarding this representation or any of the comments submitted by Horsham District Council officers, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Norman Kwan'.

Norman Kwan
Senior Neighbourhood Planning Officer