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Dear Sirs

**Billingshurst Neighbourhood Plan Regulation 16 Consultation
Consultation Representation in relation to Land East of Billingshurst, Little Daux.**

Introduction

- 1.1 This representation is submitted to the Horsham District Council (HDC), on behalf of Bellway Homes Ltd (“Bellway”) and Crest Strategic Projects (“Crest”), in relation to the Billingshurst Neighbourhood Plan Regulation 16 Consultation.
- 1.2 This representation specifically relates to the key aspects of the Billingshurst Neighbourhood Plan (BNP) that are relevant to the Land East of Billingshurst, Little Daux (the Site). It follows the representation made to the previous consultation on the Regulation 14 Draft BNP, and seeks to highlight any comments or concerns to help ensure full consideration and enable the basic conditions to be met.
- 1.3 Significantly, it is highlighted that the summary of representations to the Regulation 14 consultation, as contained in the Consultation Statement (February 2020), does not refer to our previous correspondence with Billingshurst Parish Council (BPC) or our submitted representations made on behalf of Bellway and Crest. Clarification is therefore sought as to the reason why this representation is not acknowledged and whether the details and comments raised were in fact taken into consideration in preparing the Regulation 16 BNP. For ease of reference, the Regulation 14 Representation, dated 25 September 2019, is appended to this letter (**Appendix A**).
- 1.4 The BNP is now at the final consultation stage before being taken to Examination. As such it is essential that the plan meets the Basic Conditions, as confirmed in paragraph 37 of the National Planning Policy Framework (NPPF). This states:

“Neighbourhood plans must meet certain ‘basic conditions’ and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.”
- 1.5 The Basic Conditions set out within the Planning Practice Guidance (PPG), the Localism Act (2011) and paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended), are as follows:
 - a) *“having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order or neighbourhood plan;*
 - b) *the making of the order or neighbourhood plan contributes to the achievement of sustainable development;*



- c) *the making of the order or neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);*
- d) *the making of the order or neighbourhood plan does not breach, and is otherwise compatible with, EU obligations;*
- e) *prescribed conditions are met in relation to the order or plan and prescribed matters have been complied with in connection with the proposal for the order or neighbourhood plan;”*

- 1.6 The NPPF also makes clear the importance of the hierarchy of Plans. For Horsham, the BNP must therefore be in general conformity with the adopted Local Plan – the Horsham District Planning Framework (HDPF). It is relevant that HDC is progressing the emerging Local Plan Review which will replace the HDPF in approximately 18-24 months. Therefore it is important to ensure that the emerging BNP will not conflict with the emerging Local Plan Review, if it is to avoid future conflict and the possibility of becoming quickly out of date.
- 1.7 In this regard, the NPPF paragraph 29 makes clear that Neighbourhood Plans must not undermine strategic policies. There is no expectation for any strategic decisions to be made by Neighbourhood Plans and as NPPF paragraph 69 highlights, Neighbourhood Plans which make allocations should consider opportunities for small and medium sized sites. In this case, the BNP does not allocate sites for development, instead focusing on the sites that have already gained planning permission since 2011 or been allocated by HDC in the HDPF.
- 1.8 For the avoidance of doubt, this representation makes reference to S106 contributions and Community Infrastructure Levy (CIL). However, as BPC will be aware, the Planning White Paper consultation (August 2020) proposes to replace these levies with a new post development tax ('Infrastructure Levy'). Therefore, where this representation refers to S106 and/or CIL, this should also be interpreted to mean any alternative that may supersede them as a result of the White Paper recommendations.

The Site

- 2.1 The site is being actively promoted through Horsham's Local Plan Review for a residential led development. It is identified by HDC as one of the strategic housing options that may come forward in the emerging Local Plan Review (part of Site SA118). It lies to the east of Billingshurst and is outside of, but immediately adjacent to, the existing settlement boundary.
- 2.2 The site has an area of circa 37 hectares and comprises a number of agricultural land parcels located to the north of the railway line, albeit land to the south of the railway line has also been promoted for a longer term strategic development on behalf of Bellway only.
- 2.3 The Rosier Business Park is adjacent to but outside of the site and forms an existing business centre. There are two listed buildings adjacent to the site, comprising the Grade II Listed farmhouse at Little Daux Farm (listing ID: 1354140) and the Grade II Listed Rosier Farmhouse (listing ID: 1027129). Approximately 3.2 hectares of the site is designated as a Site of Nature Conservation Importance (SNCI), this will be enhanced as part of the development proposals.
- 2.4 The site's western boundary abuts the existing settlement and is demarcated by trees, and the rear gardens of properties fronting Broomfield Drive and Brookers Road. There is an existing access into the site from Brookers Road and a footpath link from Broomfield Drive. Further access points are provided off Coneyhurst Road (A272) to the east and off the A272 to the north. This currently serves Little Daux Farm.

Strategic Development Opportunity at Little Daux

- 2.5 Representations sent to HDC in March 2020 indicated that the site (north of the railway), known as Little Daux, has capacity for delivery of 650 homes, including 35% affordable housing provision (circa 228 affordable homes). In addition to much needed housing, the proposed development at Little Daux will also deliver:

- A new community hub with the potential to offer a café, community hall, co-working space and an Ambulance Community Response Post;
 - Land for a new primary school at the heart of the development;
 - Dual-use playing fields as part of the primary school for use by the wider community;
 - An outdoor adult gym, park with a equipped play and recreation space, as well as links to a circular trim trail;
 - Enhancements to green infrastructure, including improvements to the SNCI on the site;
 - Additional Station Parking; and
 - Land for additional commercial floorspace at the southern gateway to the site.
- 2.6 In total, the site will deliver circa 18 hectares of green space, in addition to open space provision, ecological enhancements to Wilden's Meadow SNCI and biodiversity net gains of 17.12% habitat units and 12.10% hedgerow units.
- 2.7 Notably, the development at Little Daux makes provision for all relevant infrastructure, including the provision of a new primary school, as part of the strategic allocation. As such, there is less uncertainty surrounding the delivery of this infrastructure in Billingshurst.
- 2.8 The site would be accessed from a new access onto the A272 to the east.

Representations to the Regulation 16 Neighbourhood Plan

- 3.1 The Regulation 16 BNP was published for consultation on 17 June 2020 and invites comments until 12 August 2020. Where relevant to the site, the following provides comments, concerns and areas of support for the Plan to help inform the final stages of the Neighbourhood Plan process.

Objectives

- 3.2 The BNP has not allocated sites for development. However, it remains prudent for the Parish to facilitate the development at Little Daux to safeguard the vitality of the village. Notwithstanding this, the benefits of the site should be highlighted, particularly in relation to the 6 identified objectives on page 9 of the BNP:
- **Objective 1:** The site will deliver high quality, sustainable, new housing that reflects the existing village vernacular and respects the character of the wider locality.
 - **Objective 2:** The development will provide new infrastructure to support the community, including a new primary school, central hub, with provision for flexible office space for home working, and the potential for medical facilities on the site. This is in addition to the various area of public realm set out above all of which will be available for use by the existing and new community of Billingshurst.
 - **Objectives 3:** New connections will be provided to the railway station and towards the centre of the village, to ensure that the development provides a safe environment for all road users. The proposed scheme will emphasise the benefits of sustainable transport modes, providing legible and attractive pedestrian and cycling routes connecting the site with the village.
 - **Objective 4:** Crest and Bellway are committed to creating a sustainable extension to the village, ensuring that this development will complement, support and enhance the local economic activity in the Parish. Benefitting from to its proximity to the High Street, this development will reinforce the vitality of the existing

services and facilities in Billingshurst. Notwithstanding this, additional complementary employment or community facilities will be provided as set out in relation to Objective 2 above, benefiting the village overall.

- **Objective 5:** Little Daux will incorporate appropriate mitigation to ensure that there is no increased risk of flooding in the area resulting from this scheme. In addition, biodiversity enhancement and net gain will also be delivered (exceeding the 10% recommendation of the NPPF As set out above). The development parcels proposed have been informed by the native hedgerows and trees on the site, which will be enhanced as part of the green infrastructure proposals. In addition, the development will provide new walking routes that connect to Wilden's Meadow SCNI, promoting wildlife and access to nature. With provision of new employment space and public amenities on site, as well as greater access to the train station, residents and visitors will not need to use private vehicles to travel. These factors, in combination with Crest and Bellway's commitment to the high standard of Building Regulations, will ensure that the development minimises and mitigates impact on climate change.
- **Objective 6:** This development will be sensitively designed to reflect the location of Little Daux. The scheme will be landscape led in its overall layout and design, including extensive areas of public open space and new landscaping, to create a high quality environment throughout. This was demonstrated in the representations to HDC in March 2020, through the vision document and illustrative masterplan, both of which can be forwarded to BPC if requested and are provided at **Appendix B** to this representation along with the remainder of that representation (dated March 2020).

Key Issues

3.3 The BNP identifies a number of key issues for Billingshurst on page 10. In relation to these, the benefits of Little Daux should also be highlighted as follows:

- **Road Congestion:** Little Daux will provide all necessary infrastructure to accommodate the development itself, and in particular with regards to traffic. This includes a new roundabout to access to the site from the A272, which will also offer the benefit of traffic control along this main road. Elsewhere around the general area, traffic modelling has and will be undertaken to ensure that any further improvements required to accommodate the development are delivered. This will ensure that the scheme has no greater impact on existing issues, and in the longer term, is capable of supporting road improvements that will be of benefit to the wider area more generally.
- **Car Parking:** Parking will be provided at Little Daux for all proposed uses, ensuring that there is no greater pressure on the village arising from visitors, occupiers or employees at the site. In addition, land is proposed for an extension to the station car park. This will help to reduce the existing pressures in this location.
- **Retail Experience and High Street Improvements:** Development at Little Daux will support the growth, vitality and viability of the High Street. It will improve the permeability of the village, with new connections between the station and village centre, and increasing footfall to local services to help support them in the long term. This is intended to help increase footfall and encourage other businesses into the High Street, improving its retail offer and the overall experience for the local and wider community.
- **Improved Public Transport:** The Development at Little Daux provides an opportunity to help enhance the local public transport facilities in the area. In particular, the availability of land for a station car park extension is a key aspect of this, as it may help to make the facility more attractive to those living in the wider area or far side of the village who cannot walk to the station. Equally, the greater population in the village resulting from the development will also increase pressure for improved and more regular services from the public transport service providers operating in this area.
- **Education and Medical Facilities:** A new primary school is being provided at Little Daux. It will serve the existing community and proposed development. Where required, contributions would be made for improvements to the existing medical facilities in the village and there is an opportunity to provide an Ambulance Community Response Post within the site, enabling faster access to emergency care. However, whilst the need for access to high quality primary care is understood, it is acknowledged that the

ratio of patients to doctors in Billingshurst is lower than the District and national average so advice would be taken from HDC on this matter.

- **Maintaining a 'Village Feel':** The masterplan that has been prepared for Little Daux specifically seeks to ensure that the development integrates and contributes to the quality and character of Billingshurst. It will be a spacious, landscape led development, which aims to add positively to the existing village feel.
- **Workspace Provision:** In addition to providing a community hub with local facilities such as a new community hall, café and meeting space, all of which could be used by local business persons working from home, the site will also deliver an area of commercial space adjacent to the main site entrance. This offers village residents an opportunity for access to further local employment space potentially for smaller businesses, start-ups and training. This will complement existing services and encourage new businesses to trade in the area. Equally, this provision will reduce the need for travel to places of work, helping to improve the long term sustainability of the village and helping to increase the footfall and patronage to local shops, services and public transport.
- **Housing Needs:** In terms of providing a range of homes to address specific needs, Little Daux has the ability to provide a range of Starter Homes, Family Homes and Life-Cycle Homes to cater for various needs in Billingshurst.

Aim 1: Prepare for early review of the BNP

- 3.4 **Object:** As previously noted, the BNP is based on the HDPF which was adopted in 2015 and will become out of date in December 2020. As such, the BNP acts as an interim policy document to guide development in the Parish up until the adoption of the emerging Local Plan Review. Whilst the intent of this aim is supported, the commitment to an early review of the BNP should be elevated to the first strategic policy within the BNP. This would underline the importance of a review in the immediate future to account for changes in local and national policy.
- 3.5 As a result of Covid-19, HDC has also outlined that it has had to undertake a review of the Local Development Scheme, and the timetable for progress of the Local Plan Review. As a result, HDC currently anticipates that the Regulation 19 Consultation on the Local Plan Review will not take place until early 2021 (originally intended for September / October 2020).

Aim 2: Work with key stakeholders to deliver improved health and education facilities

- 3.6 **Support:** As noted in the response to objective 2 and paragraph 3.3, the development at Little Daux will help to achieve this aim through the provision of a new primary school and the potential for Ambulance Community Response Post on the site. Crest and Bellway are committed to delivering educational facilities as part of the development and have spoken with HDC and West Sussex County Council (WSSCC) to achieve this.

Aim 4: Footpath and Cycle Route Infrastructure

- 3.7 **Support:** Bellway and Crest share BPC's ambitions for attractive and usable footpaths and cycle route infrastructure in the Parish. As a sustainable urban extension, Little Daux will be able to provide clear and legible routes through the site, to provide sustainable transport options throughout Billingshurst to connect existing and proposed services and facilities in the village.

Spatial Strategy and policy BILL1: Billingshurst Built-Up Area Boundary

- 3.8 **Object:** This representation principally objects to the built up area boundary (BUAB) set out in BNP Policy BILL1. As the BNP has not allocated sites for development, the settlement boundary for the Parish should be left for HDC to determine. This is linked to the comments above in relation to Aim 1.
- 3.9 In this regard, Policy 15 of the HDPF identified that Neighbourhood Plans should bring forward 1,500 homes. BPC has made a decision not to allocate any sites (small or large) for housing development. Therefore it is not necessary for the BNP to definite a BUAB as this is already covered by the HDPF. Furthermore, as BPC is

aware, the HDPF is presently being reviewed through the Local Plan Review Process, and this will make any further allocations for housing in the village and wider Parish, also outlining any proposed amendments to the settlement boundary to align with this.

Policy BILL2: Housing Design and Character

- 3.10 **Comments:** Earlier representations raised an objection to this policy, on the basis that part A was unclear with regards to requirements for good design. The policy now included a list of expectations for good quality design. Whilst this is clearer, there are some concepts that may be difficult to implement together. Before progressing to examination, it is necessary to ensure that the BNP includes sufficient flexibility to allow a development to have its own identity whilst also respecting the qualities of the area.
- 3.11 It remains the case that there is some overlap between Policy BILL2 and Policy 33 of the HDPF and arguably some conflict arises between competing interests of delivering a locally distinctive development (Policy 33) and delivering specific features in a scheme that may not reflect existing character. Overall it remains important for the policy to convey the importance of high quality design, ensured by evolution of proposals and supported by design strategies secured at the planning application stage. These requirements in BILL2 are capable of being secured in this manner as applicable to individual sites.

Policy BILL3: Energy Efficiency and Design

- 3.12 **Support:** The attached representations submitted to HDC's Regulation 18 Local Plan Review in March 2020 (**Appendix B**) attest to Bellway and Crest's commitment to the development of a high-quality and sustainable new development. The scheme is intended to meet and exceed the sustainable design interventions outlined in the emerging BNP.
- 3.13 Little Daux benefits from a genuine choice of transport modes, providing opportunities for electric vehicle charging points, car clubs, ready access to an established train station and the prioritisation of pedestrian and cycling routes across the site. In addition, the new dwellings will be constructed in accordance with the necessary energy efficiency requirements to mitigate against climate change.
- 3.14 To facilitate this, Bellway and Crest are open to positive engagement with BPC to promote sustainable development at Little Daux wherever it is viable to do so.

Policy BILL 4: Provision of Leisure and Recreation Facilities

- 3.15 **Support:** Little Daux covers circa 37 hectares; a large proportion of which will be dedicated to open space and infrastructure, including extensive amenity and open space, a potential trim trail, wildlife corridors, ecological enhancements, play areas and SUDs. In addition the proposals include dual use playing fields for the new primary school that would be available for community use. This commitment to green space and recreational facilities within the development demonstrates the site's compliance with Policy BILL 4 and its compatibility with the wider objectives of the BNP.

Policy BILL 6: Integrated Infrastructure

- 3.16 **Support:** The text associated with this policy refers to education and health improvements. As set out above, Little Daux will be providing a new primary school and this provision will support the objectives of this policy. As applicable, S106 contributions or CIL will be provided that can also support improvements to primary care in the village where this is required by the CCG and local primary care providers.

Policy BILL 7: Retaining and Enhancing the Vitality and Viability of Billingshurst Village Centre

- 3.17 **Comments:** Whilst this emerging policy predominantly relates to development in the village centre, the sentiment is pertinent, specifically its ambitions to support the vitality and viability of town centres. The proposed development at Little Daux will promote the economic viability and vitality of Billingshurst village centre by providing new homes with direct links to the High Street. This will provide additional patronage and increase footfall along the High Street to encourage vitality in this area.

Policy BILL 10: Flexible Workspaces

- 3.18 **Comments:** The general aims of this policy are supported, as Little Daux has the potential to deliver some flexible workspace. However, the policy limits development to existing buildings and areas within the BUAB. The limited space within the settlement for development is evident, and there is a potential conflict with the HDPF. This is particularly the case in the High Street where HDPF Policy 12 identifies that there is a balance to be made between maintaining a diverse range and choice of suitable uses which would include retail and other businesses, whilst ensuring that in these locations there remains a convenient, cohesive and concentrated primary area with a high proportion of retail (A1) uses and proposed Class E uses. Therefore whilst BILL 10 refers to Policy 9 of the HDPF, it should also refer to Policy 12, which is clearly applicable to central areas including the High Street. BILL 10, or its preamble should be re-worded to ensure that the HDPF is appropriately reflected, that is assuming that BNP is progressed now rather than waiting to align with the emerging Local Plan Review.

Policy BILL12: Protection and Enhancement of key movement routes

- 3.19 **Support:** Little Daux will enable the retention and enhancement of key public rights of way, ensuring additional north-south and east-west corridors, including to key locations such as the station and village centre. Future residents at Little Daux will benefit from a comprehensive and legible development that actively encourages increased footfall in Billingshurst.
- 3.20 Bellway and Crest have committed to providing direct access at the north of the development to Amblehurst Green to facilitate movement between the two developments and the village. In addition, the proposals at Little Daux will provide vehicular access to the A272, and cycling and pedestrian routes throughout the site, improving permeability and encouraging thoroughfare throughout.

Policy BILL13: Public Car parking

- 3.21 **Support:** This policy seeks to encourage new and retained parking areas in the village, including at the station. Although the policy wording need not be changed, it is highlighted that Little Daux will provide an opportunity for an additional station car park, with land being set aside specifically for this purpose in the illustrative masterplan. This proposal fulfils the non-policy action identified on page 73 of the BNP.

Policy BILL14: Residential Parking Provision

- 3.22 **Objects:** Policy BILL 14 should be informed by the latest evidence provided in the Horsham Local Plan Review and the parking standards set out by the West Sussex County Council (WSSC).
- 3.23 HDC has adopted the WSSC parking standards and hence this should be explicitly stated that developments should accord with these countywide parking standards. It is essential to ensure that requirements for on-site parking provision does not conflict with that guidance.

Policy BILL15: Local Green Spaces

- 3.24 **Comments:** The BNP does not allocate Local Green Space on the site. This will be considered in the design evolution of Little Daux and will account for the emerging policies set out in BNP and Horsham's Local Plan Review.

Policy BILL16: Multi-Value Sustainable Drainage Systems

- 3.25 **Comments:** Little Daux will incorporate SUDs which have been designed into the scheme from the outset and with input from both an Ecological and Drainage consultant. A significant proportion of the site is in flood zone 1 and so has the lowest risk of flooding. The current strategy limits peak flows from the development to existing greenfield rates and provides long term storage, ultimately resulting in no negative offsite impacts.
- 3.26 Whilst there are no objections to this policy, the wording of Part C should make an allowance for the fact that long term maintenance strategies are often not provided at the planning application stage but are secured either

by way of a planning condition or through a S106 obligation. This is because the degree of detail stated in the BNP is not often known at the application stage and, in instances where it is, it can change before a development is occupied. This degree of flexibility is essential to ensuring that development is not unduly restricted and can come forward quickly and efficiently in any given location.

Policy BILL17: Views to St Mary's Church

- 3.27 **Comments:** Bellway and Crest support the emphasis made in the BNP to uphold the integrity of St Mary's Church in the village. A full heritage assessment will be undertaken to inform the design evolution of Little Daux. This will be provided as part of any future planning application and ensure that the requirements of this policy are met.

Supporting Documents

Density Topic Paper

- 3.28 **Comments:** It is assumed that the Density Topic Paper is relevant to development within the existing built environment and will not be applied to urban extensions. In accordance with local and national policy, the density of all new development in the District should be designed in response to the emerging policies of the Local Plan Review and guidance within the Planning White Paper (August 2020) and National Design Guidance.

Housing Need Paper

- 3.29 **Comments:** The Housing Need Paper was drafted in April 2018 to identify the types of housing required by the existing and future populations in Billingshurst. This paper is based on policies in the adopted HDPF and does not consider the latest evidence which is informing HDC's Local Plan Review. This paper has recommended that BPC defer to the policies set out in the HDPF to inform housing mix and is, therefore, arguably not up to date.
- 3.30 In this regard, HDC is developing District Wide evidence base with Crawley Borough Council and Mid Sussex District Council which will account for the density, mix and tenure of housing to ensure needs are appropriately met. The primary driver for housing need will therefore be governed by the new Planning White Paper and revisions to the Standardised Methodology for Calculating Housing Need.

Summary

- 4.1 Little Daux is the most sustainable greenfield site in the District. This proposal represents the most logical extension for the village, enabling comprehensive plan-led development which can provide real and positive benefits for the village in the short and long term. The site is therefore being promoted to HDC as a strategic housing led development opportunity, which incorporates a range of other facilities including a primary school, community spaces, employment and a car park extension for the village train station.
- 4.2 Whilst the BNP could allocated sites for development, it is clear that the aspiration remains to support HDC in allocation through the Local Plan Review. It remains that there are no objections to this approach but it is felt that this should be appropriately reflected in the BNP with the removal of the settlement boundary policy (BILL 1). This would also avoid the need for later amendments to the BNP to ensure that it is capable of aligning with the emerging Local Plan Review.
- 4.3 This is pertinent to the other emerging policies within the BNP as the adopted Development Plan in Horsham will become out of date at the end of 2020. The adoption of the policies within the BNP is therefore only currently capable of serving as an interim measure to cover and address development in the Parish between the end of

this year and adoption of the Local Plan Review. At this point, the BNP will require further updates and reviews if it is to form a functional part of the Development Plan.

- 4.4 It is hoped that this representation helps to further inform the final stages of the BNP process, prior to Examination commencing. If taken on board, these comments will help to ensure that the BNP can pass Examination and proceed to Referendum. We also want it acknowledged that we submitted duly made representations at the Regulation 14 stage (Appendix A), and for these to be referred to in the Evidence Base.
- 4.5 Should you have any queries in relation to the details of my letter, please do let me know.

Yours Faithfully,



Director

Encl:

Appendix A - Regulation 14 Representation (September 2019)

Appendix B – Representations to HDC’s Local Plan Review (March 2020)