



**Horsham
District
Council**

Representation Form

Itchingfield Neighbourhood Plan 2019-2031

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

Itchingfield Neighbourhood Development Plan

Horsham District Council has reviewed its protocols regarding the consultation process for neighbourhood plans. 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.

Itchingfield Parish Council has prepared a Neighbourhood Development Plan (INP). 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 INP and associated documents will go out to consultation from:

5pm 17 December to midnight 11 February 2021 for 8 weeks inviting representations on the draft submission plan, basic conditions statement, consultation statement, Habitat Regulations Assessment and the full Strategic Environmental Assessment (SEA).

Copies of the INP 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 11 February 2021

There are a number of ways to make your comments:

1. Please click on the weblink above to view the plan and support documents;
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	The Stanley Building, 7 Pancras Square, London
Postcode	N1C 4AG
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	Inspired Villages
Position (if applicable)	Planning Director
Date	10 February 2021

PART B

To which part in the plan does your representation relate?

Paragraph Number:	1.2.12 6.2.1 to 6.2.9	Policy Reference:	Objective 1 Policy 4 Policy 6
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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:

NPPF para 60 references determining the 'minimum number of homes needed' and meeting unmet needs from neighbouring areas.

NPPF para 61 also talks about the size, type and tenure of housing need for different groups in the community being assessed and reflected in planning policies and contains a non-exhaustive list including affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent and self-build.

The NP identifies two site allocations plus a travellers site. **NP para's 6.2.1 to 6.2.9** discusses how Itchingfield Parish Council (IPC) determined its 'indicative figure' for a housing requirement based on a mid-point of three data sources. This is not a justified approach.

- Any figure should be a minimum number and not an indicative one. The need for housing in the district and nationally is significant.
- The housing needs register figure is presumably based on those in need of affordable housing and does not consider all forms of accommodation which are required, including private housing.
- The NP does not state how it will meet the needs, in full, of all different groups in the community, particularly for older people.
- The NP does not identify, as it should do, whether there is any unmet need arising from neighbouring areas and how this may be met within Itchingfield.
- The NP does not identify constraints, which prevents development from taking place to meet the minimum needs of the parish and, where required, neighbouring areas.

NP para 1.2.12 says the NP is not just about housing numbers, but is about the sort of housing needed in the parish, design and where it should be built, as well as other factors such as the economy, etc. Inspired Villages, in partnership with Legal & General, has legally secured a site at Wellcross Farm (between the existing complex of buildings at Wellcross Grange, Five Oaks Road and the southern edge of Broadbridge Heath) on land at the northern edge of the parish. It does not conflict with Policy 27 of the HDPF, constituting 'infill' development between those existing built features, would not result in coalescence between settlements and will not act as a precedent for further southern expansion into the parish.

The development proposes a continuing care retirement community and Policy 18 of the HDPF supports such proposals can be outside existing built-up area boundaries. There is a significant unmet need for specialist housing for older people as identified by Government in the National Planning Policy Guidance (housing for older and disabled people) as 'critical' (Paragraph: 001 Reference ID: 63-001-20190626). This was included in the PPG on the 26 June 2019. The NP does not acknowledge this material consideration nor does it set out how this critical need will be met.

The draft Horsham Local Plan (Reg 18) was subject to public consultation in 2020 and which identified the above site as a potential site allocation (reference: SA622 – Land at Wellcross Farm) for 100-150 dwellings. A planning application for a continuing care retirement community was determined by the Council in 2020. The application was recommended for approval by the Council's planning officers demonstrating the proposals were in compliance with the development plan and the submission was technically sound. The application was refused by the planning committee following a refusal at a previous committee, on an adjacent site – Lyons Farm on the north side of Five Oaks Road (Slinfold parish). The Wellcross Farm application has been appealed and is with the Planning Inspectorate for a decision by Spring 2021. The Reg 19 version of the Local Plan has been delayed until April/May 2021.

The NP is being progressed based upon the HDPF adopted in 2015 and which does not reflect the updated evidence base on housing needs and other factors, updates to national planning policy

and guidance which are informing the emerging Local Plan. The approach to progressing a NP ahead of the new Local Plan is not logical and is contrary to the NPPF, and this conflicts with **Objective 1** of the NP “to provide adequate and appropriate housing for the future needs of the parish” as the housing figures for the NP are derived from discussions with HDC in 2018 and this is not up to date.

The proposed continuing care retirement community will provide many benefits to the parish and the local community. There must be recognition that such a development is very different from a residential development. Inspired Villages is there for the long-term providing more than just homes but also providing jobs, facilities, (which are publicly accessible) and other enhancements, including:

- The provision of specialist housing for older people with a mix of one, two and even three bedroom houses and apartments in compliance with **NP Policy 14** and meeting a local and district-wide need.
- The provision of affordable homes for older people.
- Freeing up under occupied homes in the local area and further afield, suitable for meeting the needs of other groups in the community, especially families.
- Providing a wide range of communal facilities within the development for use by the residents on-site but also the wider community (e.g. café/restaurant, wellbeing centre, etc) as it will provide a vibrant and sustainable community. The facilities will improve and enhance the infrastructure of the parish by providing valuable facilities and services in compliance with **strategic objective 2 and 3 of Chapter 5 – Community Infrastructure**.
- Includes fast-charge electric vehicle charging points (typically 10% of the parking spaces) with passive provision normally provided for all other parking spaces. The company is working towards low-zero carbon by 2030 and normally includes a range of sustainability measures such as fabric-first and renewables in compliance with **NP Policy 13**.
- Providing a significant number of jobs on-site in a range of different roles (from administration and management, to maintenance, groundskeeper, catering, housekeeping, care) and also indirect employment via the supply chain. The NP says it is not just about housing numbers, however, the economy section fails to plan positively to support the economy of the parish. A retirement community would be a major local employer (approx. 33 operational jobs) which would be of significant benefit to the parish, generating inward investment and much needed employment opportunities.
- Significantly lower levels of car ownership (approx. only 70% of residents bring a car with them upon moving in, and usage is low as residents have access on-site to a range of facilities or can use the village transport service when they need to go shopping, medical appointments, etc) and is predominantly off-peak.
- Significant savings to the NHS and social care budget each and every year. There is a range of evidence which demonstrates living in a retirement community reduces the number of GP appointments, hospital appointments/hospital stays and the need to go into a care home allowing people to remain in their own homes for as long as possible because the properties are purpose built for this and with on-site care and assistance available 24/7.
- Enhancements to pedestrian and cycle access on Five Oaks Road and the surrounding Public Rights of Way network. These improvements are set out in the legal agreement and complies with **NP Policy 5, AIM 6 and AIM9**.
- Includes landscape and biodiversity enhancements within the site and the river corridor in compliance with **NP Policy 1 and 2**. Significant areas of open space would be provided which would be publicly accessible. **NP Policy 4** is not positive and should be amended to encourage the provision of new open space.

What improvements or modifications would you suggest?

Housing policy

- The evidence base must be updated to reflect the emerging Horsham Local Plan and the latest housing requirement and to meet the critical need for older persons housing upon which the plan is currently silent.
- There is a need for a specific policy (rather than supporting text) which sets out the housing numbers for the parish as a minimum figure and how it is meeting the needs for all groups as per NPPF para 61.
- The NP must align with the emerging Local Plan and the up to date evidence base contained therein rather than reliance on outdated evidence from the HDPF. This is set out at para 13 of the NPPF. As currently proposed the NP would not be supporting the up-to-date delivery of strategic policies contained in the local plan.

Economy policy / aims

- Should be amended to positively support local employment generation. This would encourage the provision of new jobs within the parish, reduce out-commuting and generate investment into the parish. The retirement community could generate approximately 35 jobs on-site in a range of roles and there should be encouragement for local residents to have access to opportunities.

Policy 4 should encourage the provision of new areas of open space.

Community facilities

- **Policy 6** should be amended, or a new policy produced to encourage the provision of new community facilities. This is essential to add to what is already present in the parish and to be progressive. The retirement community would contribute to the provision of much needed facilities for the parish and access to the wider community would be secured within the legal agreement.

General

- The NP should acknowledge that development can have considerable beneficial impacts to the parish: creating much needed new homes, construction and operational jobs, new facilities and open space. An allocation of the Wellcross Farm site would have significant benefits to the parish.

(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 Itchingfield Neighbourhood Development plan?

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