

12 August 2020

Delivered by email

Billingshurst Parish Council
Billingshurst Centre
Roman Way
Billeshurst
West Sussex
RH14 9QW

Ref: LINR3010

neighbourhoodplan@billingshurst.gov.uk

Dear Sir / Madam

BILLINGSHURST NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION WRITTEN REPRESENTATIONS ON BEHALF OF VISTRY HOMES

These written representations have been prepared by Turley, on behalf of our client Vistry Homes (formerly Linden Homes), in respect of the Billingshurst Neighbourhood Development Plan Regulation 16 Consultation. It is not our intention to make specific comments on the Neighbourhood Plan other than to echo our previous comments regarding the proposed Local Green Spaces policy (Policy BILL13).

Vistry feel it is important to clarify their position and the purpose of these representations. It should therefore be noted that following the acquisition of Linden Homes and the Partnerships and Regeneration business of Galliford Try plc on 03rd January 2020, the Vistry Group was formed. Linden Homes are now referred to as Vistry Homes.

In our previous representations (September 2019), we introduced to the Parish Council the parcel of land which Vistry is promoting through the Local Plan Review process. For ease of reference, this includes the area of land to the west of the A29 (Land at Bridgewater Farm). The proposed site is being promoted for residential development and is not subject to any ecological or landscape designations or constraints which indicate that it could not accommodate development.

Billingshurst Neighbourhood Plan – Regulation 16 Consultation Response

Policy Context

The introductory section of the Neighbourhood Plan seeks to set the planning policy context for the District and the Parish. It is noted that the District has an adopted development plan (Horsham District Planning Framework) which requires the provision 16,000 new homes between 2011 and 2031, including 150 homes on the land south of Billingshurst. Furthermore, we note the Parish Council's acknowledgement that Neighbourhood Plans should be in general conformity with the HDPF. As a consequence the NDP seeks to build on the policies contained with the current HDPF.

6th Floor North
2 Charlotte Place
Southampton
SO14 0TB

T 023 8072 4888 turley.co.uk

Notwithstanding the above, the District Council have initiated a Local Plan Review. This is in the early stages of the plan preparation process (Regulation 18 consultation undertaken in early 2020) with anticipated adoption expected in April 2022. We acknowledge and support the fact that the Neighbourhood Plan does not seek to allocate sites for residential development (Paragraph 1.15), which could potentially undermine the Review process, rather the Parish intend to work with the District to consider appropriate sites at a strategic level through the plan preparation process.

As we detailed in our previous representations (dated September 2019), we note the emerging Neighbourhood Plan comments on the past levels of housing delivery experienced at Billingshurst and conclude that it is likely that it will continue to be a sustainable settlement within the Horsham District. Billingshurst is therefore likely to accommodate a proportion of additional growth within the forthcoming Local Plan Review.

With this in mind, Paragraph 13 of the National Planning Policy Framework (NPPF, 2019) states that *“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these policies.”* Furthermore, Paragraph 29 confirms that *“Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”* Taking this into consideration, it is essential that the emerging Neighbourhood Plan does not seek to influence, constrain or restrict any decisions as a result of the Local Plan Review.

Policy BILL15: Local Green Spaces

Our previous representations took note of the Parish’s intention to designate areas of Local Green Space (Policy BILL15: Local Green Spaces). We note that the principles of the policy remain largely as they were in previous iterations of the Neighbourhood Plan. The Regulation 16 document confirms that Figure 9.1 shows each of the Local Green Spaces, with further detail provided at Appendix B. Point 1 of the policy wording confirms the potential designation of an area of land wrapping round the western edge of Billingshurst, named the “Bypass Path”. As previously set out we do not agree that this swath of land is *“demonstrably special”* as identified in the supporting criteria set out at Paragraph 100 of the NPPF (2019) and consider that it should not be designated as Local Green Space. Whilst we note that the site is well utilised by dog walkers, joggers and cyclists we are of the view that it does not hold any particular local significance.

Further, we uphold our position with regard to Local Green Spaces having the potential to undermine the Plan-making process and would reiterate that the Planning Practice Guidance (Paragraph: 007 Reference ID: 37-007-20140306) confirms that *“Designation any Local Green Space will need to consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green space designation should not be used in a way that undermines this aim of plan making.”* The Bypass area as it is shown in Figure 9.1 and Appendix B should therefore not be used as a tool to restrict the growth of Billingshurst, rather it is recommended that the Parish work with the District to identify potential designations that could be incorporated into future schemes at the earliest stage of the plan making process, where appropriate.

Horsham District Council – Local Plan Review Update

Horsham District Council consulted on their Regulation 18 Draft Local Plan consultation between 17th February and 30th March 2020. The purpose of the Regulation 18 consultation was to:

- Set out the draft vision, objectives and strategy for the District over a 18 year Plan period (2019-2036);
- Present a number of draft Strategic Policies and general planning policies which identify development locations for employment, retail, housing and other needs in the District;

- Provide a number of options for housing need, including those that take into consideration the anticipated shortfall from Crawley District Council and the Coastal Housing Market Area; and
- Identify a number of locations for residential development.

We understand that the Council are now considering all representations made to understand the views of those with key interests in the Plan.

The Local Development Scheme is being updated, however we understand that the Council anticipates the following timescales for adoption of the Plan:

- Regulation 19 preparation: April – March 2020
- Proposed Submission and Period for Representation: January to February 2021
- Submission: April – May 2021
- Examination: July - September 2021
- Main Modifications: December 2021 – January 2022
- Inspector's Report: March 2022
- Adoption: April 2022

Vistry will continue to monitor the progress of the Local Plan and seek to work with both the District and Parish to ensure it is appropriately prepared.

Summary

Vistry support, in principle, the Parish Council's proposed approach to allocating development sites for the future delivery of housing growth insomuch that the Neighbourhood Development Plan will not seek to make specific allocations, but rather work with the District Council through the Local Plan Review.

The designation of Local Green Spaces via Policy BILL15 is noted, specifically the "Bypass Path" which runs along the western boundary of Billingshurst. Vistry do not agree that the proposed space meets the criteria set out at Paragraph 100 within the NPPF insomuch that it is not considered to be "*demonstrably special*". We would urge the Council to ensure that the proposed designations are not confirmed unless they satisfy the relevant criteria. In any event, these designations should not undermine the plan making process and should not be used as a tool to restrict future development within Billingshurst. In addition, we would recommend that the Parish work with the District to ensure any potential designations are considered in the round and opportunities for the inclusion of such spaces within the emerging allocations and / or framework plans can be sufficiently accommodated.

We would welcome the opportunity to engage with the Parish Council and the Neighbourhood Plan Steering Group in order to discuss the relationship of the Vistry's site (Land at Bridgewater Farm) in the emerging Neighbourhood Development Plan, in conjunction with the Local Plan Review. This engagement would provide the Parish Council and other local stakeholders to influence the proposals at this early stage and for Vistry to shape their proposals accordingly.

Should you require any further information to support these representations at this time, then please do not hesitate to get in touch with myself or my colleague [REDACTED]

[REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]