

Itchingfield Parish Council
c/o 14 Trout Lane,
Barns Green,
West Sussex,
RH13 0QD

Our ref: INP/Reg 16
Your ref: n/a
Date: 11 Feb 2021

By Email.

Dear [REDACTED],

Re: Representation to Itchingfield Submission Neighbourhood Plan (Reg 16)

Thank you for consulting Horsham District Council on the Itchingfield Submission Neighbourhood Plan and presenting an opportunity to comment on the plan. This letter highlights the key points of our representation and appendix 1 includes our detailed comments. Our representation follows on from comments made during the Regulation 14 consultation and informal feedback made at earlier stages in the process. Please note that these are officer comments.

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.

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 which proposes to make new housing allocations to count towards this requirement.

Barns Green, Itchingfield is identified as a 'medium' village in the settlement hierarchy by Policy 3 of the HDPF. It is therefore acknowledged that Barns Green as a sustainable settlement, is able to accommodate new development of an appropriate scale to the location. The Council has provided the steering group with an 'indicative' housing target of 61 dwellings over the plan period. The submitted neighbourhood plan is promoting two allocations comprising the delivery of 52 dwellings over the plan period with the remaining shortfall of 9 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 11 Windfall Development has been included in the submission plan and also welcome the clarification provided in paragraph 6.6.4 which states any windfall development

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

above the 9 units required for the Parish will contribute to the wider District allowance and be recorded accordingly. Further detailed comments on Policy 11 are included in the table below.

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 Council has recognised this. Horsham District 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 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 11.1.3 of the INP which provides a commitment to review the INP to take account of any revised housing numbers emerging from the Local Plan Review.

We previously objected to the inclusion of Policy 15: Traveller Sites in the emerging plan. We note this policy has since been removed and replaced by Aim 5: Traveller Sites. Aims included within the INP, express the views of the Parish but are not policy, and as such will not be used in the determination of planning applications. Nevertheless, Aim 5 is noted and it is considered clarifications could be made to the wording. For example, provision for touring caravans is included within the requirements for a gypsy and traveller pitch. Furthermore, it is noted that the Local Development Scheme for Horsham District (2020-2022) states the needs of Gypsy, Traveller and Travelling Showpeople will be considered through the Local Plan Review process.

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,


Senior Neighbourhood Planning Officer

**Appendix 1: Horsham District Council Comments to the Itchingfield Submission Plan
11 February 2021**

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
Policy 1	Support is given to this policy especially the final section which references clear government guidance with regards to achieving a net gain in biodiversity. It is recommended the last paragraph is revisited and clarification is sought on whether this part applies blanket coverage to all developments from one dwelling infill sites to large development proposals. Could this part of the policy be inserted directly to Policies 9 & 10?	For clarity.
Policy 4	We note and welcome the amendments made to this policy in response to our previous comments.	None.
Policy 5 – Protection of green infrastructure	It is considered given the prominence of green infrastructure, and protection afforded to natural assets such as ancient woodland and veteran trees within the NPPF, the term ‘where possible’ should be deleted from this policy.	Remove ‘where possible’
Policy 9 – Summers Pond Site	The site, at its nearest is over 400m from the main recreation ground and play facilities at the village hall. The Horsham District Sport, Open Space & Recreation Study (2014) recommends play facilities should be within 400m. In addition, Fields in Trust recommend a 100m walking distance to a Local Area for Play (aimed at very young children) and 400m for a Locally Equipped Area for Play. On this basis, it is considered that the development at Summers Pond should	Require appropriate play facilities within the recommended walking distances.

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	<p>be required to make provision for appropriate play facilities within the recommended walking distances.</p> <p>Whilst the proposal site is within walking distance of some local facilities (e.g the post office), there is no footpath on Chapel Road up to Farm Close. To enable new resident to access local facilities by walking or cycling, the proposal should provide an attractive and accessible public link which connects to the nearest convenient point on the local footway. Reference could also be made to Aim 9 – pedestrian pavements.</p> <p>Criterion 4. Given the areas of existing mature woodland form part of wider habitat network and the biodiversity value of existing hedgerows, it is considered insufficient to seek their protection only ‘where possible’. Particularly if this proposal site is to achieve a biodiversity net gain (see comments on Policy 1).</p> <p>Criteria 5 of the policy appears to deal with two separate issues – protection of heritage assets and contamination. Recommend these are issues separated into two criteria.</p>	<p>Provide suitable pedestrian and cycle links to the village.</p> <p>Remove ‘where possible’ and replace with <u>‘a proposed loss of or damage of existing mature trees and hedgerows should be avoided, and if demonstrated as unavoidable, appropriate replacement or compensation will be required.’</u></p> <p>Provide separate criteria to deal with the protection of heritage assets and appropriate contamination assessment and treatment.</p>
Policy 10	Suggest criteria is included to state biodiversity net gain will be sought on this site (as per comments for Policy 1).	For clarity.
Policy 11 – Windfall development	The supporting text for this policy paragraph 6.6.3 suggests development adjacent to the Built Up Area Boundary for Barns Green will be considered windfall, however the Policy refers to only development within the BUAB – in line with HDPF Policy 3. We recommend the reference to development adjacent to the BUAB is	For clarity.

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
	removed. The use of windfall should be carefully considered and how is recorded for purposes of housing trajectory.	
Aim 5 – Traveller Sites	See main letter.	