

# **Billingshurst Neighbourhood Plan Consultation Statement**

**Consultation Statement**

**Submission Stage (Regulation 16)  
February 2020**

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# 1 INTRODUCTION

1.1. This Consultation Statement has been prepared in accordance with regulation 15(2) of Neighbourhood Planning Regulations 2012 (as amended), which requires that a consultation statement should:

- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- explain how they were consulted;
- summarise the main issues and concerns raised by the persons consulted; and
- describe how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

1.2. The policies contained in the Billingshurst Neighbourhood Development Plan (the 'Neighbourhood Plan' or 'the Plan') have been developed as a result of extensive interaction and consultation with the community and businesses within the area. The work has engaged community groups over three years, including through surveys, public meetings and events. This has been overseen and coordinated by Billingshurst Parish Council via a dedicated Committee and then Working Party. The process has been supported throughout by Navigus Planning, a neighbourhood planning consultancy that was appointed following a competitive tendering exercise.

## **Organisational structure of the Committee / Working Group**

1.3. The Plan has been prepared after extensive community involvement and engagement. It reflects the views of the community and expressly the need for good design and layout of development, provision of leisure facilities and protection of green spaces of value to the community.

1.4. The Parish Council, as the formal lead on the Plan, initially put in place a Committee with full delegated powers to undertake the work. This was subsequently replaced by a Working Group, largely due to shortage of Councillors able to attend the Committee, which comprised both residents and Parish Councillors. Latterly the Working Group was overseen by the Finance and General Purposes Committee of Billingshurst Parish Council, which in turn reported to the Full Council. The Working Group was, periodically, split into smaller groups who looked at specific key areas such as business, residential development, environment, and traffic and transport.

1.5. The Working Group met most months and all meetings were advertised and open to the public to view and speak at. The original Working Group consisted of ten volunteers from the community and three members of the Parish Council. This membership changed over the course of the development of the Plan and, at its peak, there were 18 community volunteers and a Working Group of 24 people in total.

1.6. Full Council received a regular progress report on the Plan and all discussions relating to the Plan – both at Committee and Full Council - were minuted. There is further detail about the Committee/Working Group on the Billingshurst Parish Council website<sup>1</sup>, which includes all of the minutes of meetings held throughout the preparation of the Neighbourhood Plan.

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<sup>1</sup> [http://www.billingshurst.gov.uk/Neighbourhood\\_Plan\\_22674.aspx](http://www.billingshurst.gov.uk/Neighbourhood_Plan_22674.aspx)

## 2 SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

- 2.1. An important part of the Neighbourhood Plan process has been to ensure that all residents and those with an interest in Billingshurst parish have had an opportunity to input into the work. The Working Group has spent a great deal of time and energy speaking to as many individuals, local groups and businesses as possible throughout the process. There has been ongoing engagement with the community – to share and disseminate information and to seek input - and also some key consultation activities at strategic points in the process. Throughout the whole process the Working Group has met frequently and these meetings have been open to the public.
- 2.2. A summary of the significant programme of engagement and consultation activity is illustrated in Figure 2.1 and a comprehensive timeline of activity is contained in Appendix A.

*Figure 2.1: Key milestones in the Billingshurst Neighbourhood Plan process*



Date	Milestones	Key activities
2015	Billingshurst Parish Council decides to develop a Neighbourhood Plan	<ul style="list-style-type: none"> <li>Parish boundary is formally designated as the Neighbourhood Area.</li> <li>Initial Steering Committee formed.</li> </ul>
2016 and 2017	<p>Evidence relating to the parish is collated.</p> <p>Extensive programme of community engagement is undertaken.</p> <p>Information about housing need and supply gathered.</p>	<ul style="list-style-type: none"> <li>Themes for the Plan selected.</li> <li>Local Call for Sites issued and site assessments undertaken.</li> <li>Housing Needs Assessment for Billingshurst carried out by AECOM.</li> <li>Draft vision and objectives formulated and consulted upon.</li> <li>Consultation activities targeting local events and specific audiences undertaken.</li> </ul>
2018 to 2020	<p>Policy options developed and feedback sought from the community.</p> <p>Working Group agrees not to include sites in the Plan, rather for an early review to take place once the strategic context of the emerging HDC Local Plan is known.</p> <p>Pre-Submission (Regulation 14) draft Plan prepared and consulted on.</p> <p>Submission Plan (Regulation 16) prepared.</p>	<ul style="list-style-type: none"> <li>Options and development workshops take place to inform the draft Plan.</li> <li>Pre-Submission draft Neighbourhood Plan is drafted and consulted on at Regulation 14.</li> <li>Comments received are collated and the draft Plan is amended in readiness to formally issue to Horsham District Council.</li> <li>Supporting documents developed to sit alongside the Submission Version of the Neighbourhood Plan.</li> <li>Plan submitted to Horsham District Council, as the lead planning authority for the Neighbourhood Plan, for Regulation 16 consultation.</li> </ul>

- 2.3. The sections below describe, in fuller detail, the engagement and consultation process which took place during the course of the Plan preparation. This is divided into five main stages:

Stage I: Launching the Plan and seeking initial input from the community

Stage II: Exploring potential sites for development

Stage III: Consolidating local survey findings and developing policy options

Stage IV: Preparing the Pre-Submission (Regulation 14) Draft Neighbourhood Plan

Stage V: Preparing the Submission (Regulation 16) Neighbourhood Plan

**Stage I: Launching the Plan and seeking initial input from the community**

- 2.4. Having decided to develop a Neighbourhood Plan, the Parish Council successfully had the parish area designated by Horsham District Council on 30 December 2015. The initial Steering Committee put together a Communications Plan and budget setting out the key messages and target audiences. It organised a stall at the annual Billingshurst Show in June 2016 to officially launch the Plan, let the local community know what was involved and to seek initial feedback about Billingshurst.



*Billingshurst Show, 2016 (photo c/o West Sussex County Times)*

- 2.5. Over the course of the day, 212 residents shared their views by way of post-it notes and sticky dots on their priorities for Billingshurst. Comments were also collated across a range of topic areas including recreation, health, employment, retail and infrastructure. The results from the events were recorded and are available on the Neighbourhood Plan website<sup>2</sup>. Issues around local health provision, car parking and retail were particularly highlighted by the community, although all topics received a significant number of comments and suggestions on how they might be improved in the future.

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<sup>2</sup> [http://www.billingshurst.gov.uk/Neighbourhood\\_Plan\\_22674.aspx](http://www.billingshurst.gov.uk/Neighbourhood_Plan_22674.aspx)

- 2.6. The stall proved to be a successful way of engaging the general public and was therefore repeated at the Flower Show in August 2016, and twice along the High Street in September and November 2016, as well as at the annual 'Billifest' in December 2016.
- 2.7. In addition to activities piggy-backing onto existing events, the Working Group took the consultation to a variety of community groups and activities in the parish. This included the Lions Club, St Mary's and the Billingshurst Family Church. Engagement was also planned with the following target audiences, which were felt to be 'harder to reach':
- Commuters – by way of an engagement activity at the railway station
  - Teenagers – by surveying students at the Weald School and engaging the Scout and Guide Executive Committee
  - Local businesses – with a survey comprising questions about what businesses most needed in order to thrive locally.

**YOUR COMMUNITY, YOUR FUTURE**  
**What sort of place will YOUR Billingshurst be,**  
**15 years from now?**  
**WE WANT YOU TO DECIDE!**

Billingshurst **now** has a once in a generation chance to produce **its own plan to say how the parish will change over the next 15 years.**

**What you need to know:**

A Neighbourhood Plan is your chance to shape the future of Billingshurst. New planning powers handed to the Town Council by Parliament give local people a say on what happens over the next 15 years.

**"What power will this give us?"** The neighbourhood plan will provide some of the important policies which future planning applications – of all kinds – will be judged against. Therefore it is a document that will have a major say on whether applications in the parish are approved or refused. And that power is in your hands. This has never been the case before, so this is genuinely ground breaking.

**"Doesn't the District Council produce this plan?"** Up until recently they were the only ones permitted to produce a plan. But the Government's localism agenda has passed the power on local matters to local people. The District Council's plan will still be important in setting the high level planning policies but many decisions can now be made locally.

**"So what can our Neighbourhood Plan cover?"** This is largely up to you. The Parish Council has come up with a list of issues it considers to be important, including:

- **Housing** - the location and type of housing
- **Employment** - how best to bring new businesses to Billingshurst
- **Retail** – the need for re-vitalise the village centre, including its shops
- **Transport** – how to minimise congestion and improve cycling, walking and public transport
- **Parking** – how to alleviate parking problems in the village, at the railway station and elsewhere
- **Education** – how to address the need for additional capacity in our existing schools
- **Health** – looking at the need for and ways to provide expanded GP services in the town
- **Tourism, Arts and Culture** – how to maximise the heritage offer of our town and its cultural facilities
- **Environment and Recreation** – improving green open spaces and play/youth facilities

These are just ideas – ultimately what the Neighbourhood Plan covers is up to you.

**"How can we get involved?"** This is not the Parish Council's plan, it is the community's plan. Without the involvement of residents, business, community groups, landowners, etc. we have no Neighbourhood Plan. We need your help.

The Horsham District Planning Framework proposes significant growth in the south of the town. Developments in recent years have not brought with them the improvements in infrastructure needed to support the growth in population. As a result, health, education and community services are under pressure. The Neighbourhood Plan is your opportunity to ensure that this does not happen in the future. New development should help to put in place the facilities that Billingshurst needs and the Neighbourhood Plan can include policies to enable this to happen. But this needs your input to ensure that the Plan gets it right.

We will be engaging with everyone in the community over the coming months so please look out for information on when and where we will be doing this. Even if we only get 30 seconds of your time, this will add to our understanding of the issues and ensure the Plan reflects a future of which the community of Billingshurst can be proud.

*Flyer to advertise the emerging development of the Neighbourhood Plan*

- 2.8. In total, in excess of 1,000 responses from the general public and 62 responses from businesses were received across the various events and activities. This initial information gathered from these activities enabled the Working Group to formulate more in-depth questions about potential future priorities for the parish and in early 2017, a fuller survey was undertaken at three events held at the Billingshurst Centre. An event was also organised to take place at Adversane Hall, in the neighbouring hamlet to Billingshurst, to ensure that those not living in the main village itself had an opportunity to input into the work.
- 2.9. The surveys undertaken, when taken together with the 'hard' evidence being gathered by the Working Group on the topic areas, enabled the group to construct a draft vision and objectives for the parish:

In 2031, Billingshurst continues to thrive as a vibrant, prosperous and distinctive parish with the village of Billingshurst at its heart.

Over the plan period the population of Billingshurst village has grown through new housing development. Much of this has been smaller housing to address the needs of both first-time buyers and renters and older 'downsizers'.

What has been critical in making this growth work for Billingshurst has been the provision of infrastructure alongside the growth. This has included the provision of an expanded doctor's surgery [*we may say in time whether this is on a new site*], additional primary school provision so all local residents can send their children to the local school, and numerous play and leisure facilities for all ages [*we may be specific about this once we know 'what' and 'where'*]. This has enabled Billingshurst to grow as a centre for arts and culture.

Along with this community infrastructure, physical infrastructure provision of flood mitigation has ensured that the village is not blighted by flooding after heavy rains. Green spaces of value to the community have been protected so the community can continue to enjoy them [*we can be specific once we have a list, although it is not necessary in the vision to list them all*].

There has been a change in the way people move around and, in particular, get to the thriving shops on the High Street. With new development located on the edge of Billingshurst village but not far from the centre, improved provision for pedestrians and cyclists along dedicated 'movement routes' has encouraged more people to walk and cycle to the High Street. This in turn has meant fewer parking issues and a generally more thriving retail scene, as more local residents want to do their shopping on the High Street.

The new development has been designed and laid out well, so it blends in effectively with the existing built form in Billingshurst. More usable public green spaces have been planned into developments and more effective provision of off-road parking spaces has meant fewer vehicles blocking roads. The new houses themselves are designed to maximise their use of renewable energy sources. In short, new development in Billingshurst is attractive, sustainable and functional. In addition, new estates have been designed to minimise the traffic coming along the High Street. Development in Billingshurst is not only about housing. Existing businesses have been given the opportunity to thrive and expand through the provision of new commercial units. Small start-up businesses have been encouraged through the provision of flexible workspace and meeting space. The commercial sector in Billingshurst is thriving.

Billingshurst village is not the only part of the parish that is thriving. The villages of Adversane and Five Oaks benefit from the improved facilities in the village, whilst seeing their distinct heritage maintained.

**Draft OBJECTIVES**

**Objective One:** Contribute to the district-wide housing requirement and provide for the housing needs of the parish.

**Objective Two:** Develop and expand local facilities and infrastructure for existing and new residents.

**Objective Three:** Improve transport and movement, in particular through non-car modes.

**Objective Four:** Ensure that development is sensitively designed to reduce or minimise flood risk, mitigate climate change, promote biodiversity and reduce our carbon footprint.

**Objective Five:** Strengthen, support and promote local economic activity.

**Objective Six:** Protect green spaces of value to the community and maintain the high quality natural and historic environment.

2.10. This draft vision and objectives document was introduced to the community in June 2017 when the Working Group took a stand at the 2017 Billingshurst Show. This provided an opportunity for people to speak to members of the Working Group about the Plan and understand how the comments received so far had been used to construct the vision. The document was subsequently sent to every household in the parish, with a voucher incentive to encourage residents to feed in their views on it. 130 responses were received, which would be used to inform a series of dedicated workshop sessions to build on the objectives and identify 'Opportunities, Threats and Considerations' for inclusion in the Plan.

2.11. Throughout this initial period of engagement activity, the following communications were included:

- Regular reports and updates through the *Village TWEET* Magazine, which goes to every household once a month
- Latterly, reports/updates and Calls to Action on E-News which goes to approx. 50 parishioners who have signed up to this service
- Posters displayed on parish notice boards and shop windows
- Leaflets sent to households
- Website running throughout process with regular updates
- Handouts/displays at community events
- Involvement of The Weald Secondary School
- Updates at Full Council Meetings as appropriate
- Regular updates on social media, most notably Facebook and Twitter

- Boards and banners throughout the parish during some consultation events.
- 2.12. Throughout the process, the Working Group was aware that, in the outlying areas of the parish, particularly Coneyhurst and Five Oaks, there was the potential for engagement to fail to reach certain groups. Residents of both Coneyhurst and Five Oaks were therefore co-opted to the Working Group during formation of the Draft Plan.

### **Stage II: Exploring potential sites for development**

- 2.13. In parallel to the work taking place to engage the local community, the Working Group initially considered that it might allocate sites for development within the Neighbourhood Plan. Early on in the process therefore, a Local Call for Sites was launched, which invited local landowners, developers and others to submit any land that they wished to be assessed for the purposes of potential allocation in the Neighbourhood Plan. The Call for Sites was advertised online and in the local press and Village TWEET magazine.
- 2.14. Over 30 sites were submitted (some had previously been submitted to Horsham District Council as part of its Call for Sites programme) and the Working Group took advice from its consultants and Horsham District Council to develop a framework against which they would be assessed. Each site was given a RAG (red, amber, green) rating<sup>3</sup> depending on how well it met each of the criteria.
- 2.15. As part of the work on sites, the Parish Council asked AECOM to carry out a local Housing Needs Assessment, which would provide additional local detail on the numbers of houses that might be required within the parish over the period of the plan and also the type and tenure of these. The report<sup>4</sup>, published in August 2017, attributed to Billingshurst a figure of between 360 and 380 dwellings to address housing need over the period to 2031.
- 2.16. Throughout the development of the Neighbourhood Plan, there was a significant amount of discussion about the inclusion of development sites in the document. This was largely related to the fact that the parish was experiencing significant strategic growth allocated in the Horsham District Planning Framework (HDPF); as at June 2019, approximately 1,250 dwellings had either been completed since the start of the HDPF plan period in 2011, were under construction or had planning permission. In terms of sites with planning permission, this excludes sites of less than 5 dwellings, so the overall total was expected to be higher. The consultants supporting the development of the Plan put together a number of options about how site allocations might be tackled, ranging from not including sites, to including small sites and larger sites.
- 2.17. In light of the fact that the Parish has already contributed greatly to Horsham District Council meeting its district-wide housing requirements, along with the fact that this was also significantly in excess of the number proposed in the independent Housing Needs Assessment, the Working Group concluded that Billingshurst parish had addressed not only its own housing need figure but also has adequately contributed towards the wider housing needs of the district required by the current HDPF.

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<sup>3</sup> Ratings ranged from highly significant negative impact to highly significant positive impact

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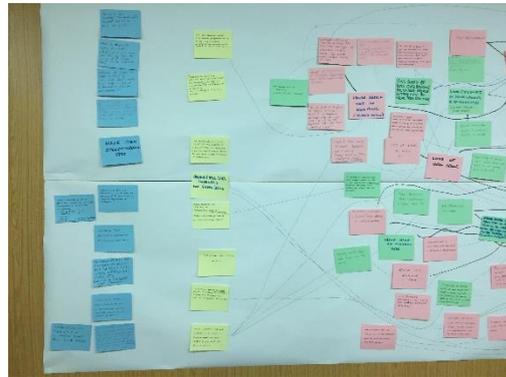
[http://www.billingshurst.gov.uk/\\_UserFiles/Files/Neighbourhood%20Plan/Billingshurst%20HNA%20Final%20Version11.pdf](http://www.billingshurst.gov.uk/_UserFiles/Files/Neighbourhood%20Plan/Billingshurst%20HNA%20Final%20Version11.pdf)

- 2.18. Notwithstanding the defined Plan period to 2031 (which aligns with the end date of the HDPF), it is recognised that Neighbourhood Plans should be reviewed periodically. Much of the strategic framework for the Neighbourhood Plan is provided by the HDPF, which is now in the process of being reviewed. To ensure that emerging Neighbourhood Plans are in conformity with the emerging Local Plan, on 13 March 2019, following on from a 'Future of Neighbourhood Planning' seminar, HDC sent a letter to all parishes setting out two options for developing their Neighbourhood Plans and in particular how site allocations might be approached. Billingshurst, as a parish with a Neighbourhood Plan at an advanced stage, considered it would continue to develop its Neighbourhood Plan, but without the inclusion of site allocations as the Working Group was concerned that the plan could be in danger of being overtaken by the review of the HDPF. Instead, Billingshurst Parish agreed to work with HDC as it undertakes the HDPF Review and allocates sites (residential and small scale employment) as part of that process. As part of this, the Parish Council will ensure that the community of Billingshurst is fully engaged in the process of allocating sites. This decision was taken in June 2019 by the Billingshurst Neighbourhood Plan Working Group.
- 2.19. It is therefore expected that an early review of the Billingshurst Neighbourhood Plan will be required to take account of the changing strategic context with the expected adoption of the HDPF Review in early 2021.

### **Stage III: Consolidating local survey findings and developing policy options**

- 2.20. Following on from the consultation on the draft vision and objectives in Autumn 2017, three interactive workshops were held across late 2017 and early 2018. The purpose of the workshops was twofold:
- to understand more fully the threats and opportunities in delivering each of the Plan objectives; and
  - to start to develop options for addressing these threats and opportunities.
- 2.21. A range of stakeholders were invited to attend including residents, developers, landowners, businesses and local councillors, from across the parish, with approximately 35 attendees in total. The vision and objectives, which had been finalised, were presented and the groups were tasked to identify potential opportunities and threats for each of the objectives. The exercise was intended to be very visual and inclusive and delegates were encouraged to write on whiteboards and use the maps provided to set out as much detail as possible on the objectives and their interlinkages. A discussion about external factors that might influence the likelihood of achieving objectives also took place and these were recorded.
- 2.22. Using the evidence gathered, the final part of the workshop asked delegates to identify possible options that should be tested at the next stage of development of the Plan. This would then inform a series of 'preferred options' to address each of the issues and these would be brought together to form the draft Plan.

- 2.23. A detailed report of the Workshop Sessions was published and is available on the Neighbourhood Plan website<sup>5</sup>.



*Images of the workshops and detail gathered*

- 2.24. A wide range of issues were raised and considered across the three workshops that would prove invaluable in determining options for the Plan. This included housing (design, density and layout), local infrastructure provision, how to sustain the vibrancy of the village centre, encouraging flexible working and improving opportunities for sustainable modes of transport, particularly for journeys within the parish. One area discussed was the problems caused by the historic location of industrial estates, which had remained in situ despite housing being built around them. This caused issues such as heavy goods vehicles driving near to homes and a lack of space for business expansion. The merits of relocating, over time, the industrial estates to out/edge of town locations was discussed, but this was felt to be too ambitious for the Working Group to tackle at this point and there was concern it might hold up progress on the Plan. A later discussion on this topic with officers from HDC confirmed the complexity of tackling such an issue through a Neighbourhood Plan and it was agreed that this would not be pursued through the current Neighbourhood Plan, but potentially revisited once the Local Plan Review had emerged and any update of the Neighbourhood Plan was being undertaken.
- 2.25. A small number of matters raised were not issues that a Neighbourhood Plan – and specifically its policies – would be able address. This includes matters such as making all local road speed limits 20mph or fixing blocked drains or broken paving stones. However, these were noted as important items that would be reflected in the ‘non-policy action plan’ to accompany the Neighbourhood Plan. Also, these items could be identified as priorities for spending of money collected under the Community Infrastructure Levy (CIL) regime.
- 2.26. The workshop outcomes lead the Working Group to compile a series of papers on each of the Plan topic areas including: Housing (including density); Retail and the High Street; Recreation and Leisure and walking and cycling. Their purpose was to consolidate the evidence – both hard data and feedback from the workshops – and to set out preferred options to include in the draft Neighbourhood Plan.

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<http://www.billingshurst.gov.uk/UserFiles/Files/Neighbourhood%20Plan/NP%20Options%20and%20Development%20Final%20Report.pdf>

2.27. Work had been ongoing to identify green spaces in the parish that local people cherished and which might be suitable for Local Green Space designation. A shortlist was drawn up from nominations received and assessed against the National Planning Policy Framework Local Green Space criteria in the NPPF. This resulted in 18 spaces being agreed for inclusion in the draft Plan.

#### **Stage IV: Preparing the Pre-Submission (Regulation 14) Draft Neighbourhood Plan**

2.28. In Autumn 2018, the initial draft Billingshurst Neighbourhood Plan was completed and submitted to Horsham District Council (HDC) for an informal Health Check. Feedback was received from HDC in the form of a Health Check report in April 2019. The report praised the considerable work that had taken place within the parish to produce the draft document, gave some general comments on areas such as conformity and formatting, and then more detailed comments on a policy-by-policy basis.

2.29. The Working Group discussed the comments and produced a formal record of how they wished to respond to each, which included noting some comments and amending the Plan for others. The Plan was then amended in readiness for the Regulation 14 Pre-Submission Draft consultation, which took place over eight weeks between 1st August to midnight on 29th September 2019. The Neighbourhood Plan and supporting documents, including a Sustainability Appraisal, were made available for comment in the following ways:

- Documents available for downloading on the website
- Hard copies of the Plan available at The Billingshurst Centre and Billingshurst Library
- Two consultation events on 7th and 11th September 2019, open to all

2.30. A summary leaflet, explaining the Plan and encouraging people to read it fully, was prepared.

2.31. Letters were also sent to Statutory Authorities informing them of the Regulation 14 consultation and how they could respond. A list of these consultee and the letter sent to them is contained in Appendix B. Responses were received from the following statutory consultees:

- Horsham District Council
- Environment Agency
- Historic England
- Natural England
- West Sussex County Council (Rights of Way Team)
- West Sussex County Council Asset Management and Estates (as a landowner)
- Southern Water
- Surrey County Council
- Slinfold Parish Council

2.32. The consultation was widely promoted through large articles in the monthly Village TWEET magazine (delivered to all households), 7 banners, 25 Correx boards, posters on notice boards and in shop windows, TWITTER, Facebook (including Facebook Live), 2 drop-in sessions (one at the Billingshurst Centre where 31 attended and one at the Leisure Centre where 25 attended). E-mails were also sent to those who had recently subscribed to a Mail Chimp direct e-mail service.

- 2.33. In total, 45 individuals/organisations responded to the Regulation 14 Pre-Submission consultation. Comments were recorded and made available for Working Group members to read and discuss. All comments received by the deadline were tabulated accordingly and the retained consultants then analysed these and made suggestions to the Working Party as appropriate. These were then carefully considered by the Working Party on 9th October 2019 and responses agreed accordingly. The list of comments made and Working Party responses can be found in Appendix C.
- 2.34. The following paragraphs provide a summary, by topic area, of the comments received during this process. Where policies are referenced by number, this refers to the numbering in the Regulation
- 2.35. **Spatial Strategy:** There was some concern among developers responding that defining a Built Up Area Boundary (BUAB) within the Plan could potentially restrict future development. This was not felt to be the case, however, as the HDPF enables development where it borders the BUAB and the Working Group felt that setting out parameters for where development is inappropriate was an important issue raised by the community. The Neighbourhood Plan commits to an early review to take into account the strategic direction of the as yet unpublished Local Plan Review.
- 2.36. **Housing:** The housing policies received relatively little comment, aside from the suggestion that certain criteria within Policy BILL2 (Housing Design and Character) were overly prescriptive. This was discussed by the group and it was decided that the policy as written did offer sufficient flexibility. Within Policy BILL2, however, an additional clause was added to support the preservation and/or incorporation of natural features such as trees and hedges, which would help to deliver a net environmental benefit.
- 2.37. **Community assets and infrastructure:** Many residents responding were acutely aware of the need to ensure that suitable infrastructure was in place to serve any new housing. There was concern that this had not always been adequately delivered in the past. In terms of leisure and recreation, additional specific detail was added to Policy BILL4 (Provision of Leisure and Recreation Facilities), to help guide developer contributions. The inclusion of Jubilee Fields as a Local Green Space was removed to ensure that recreational development that might be proposed there to enhance the space (beyond the current footprint) would still be possible.
- 2.38. Policy BILL5 (Burial Space) was felt by HDC in their initial Health Check to be beyond the scope of a Neighbourhood Plan. The Working Group reflected on this but retained the policy as there is a very real lack of burial space in the parish and the need to identify further space was something that had been raised during the engagement activity.
- 2.39. A new policy (Integrated Infrastructure) was added following feedback from Southern Water, to support the provision of utilities as necessary.
- 2.40. **Economy:** The High Street in Billingshurst provides an invaluable set of facilities for those living in the village and neighbouring settlements. Additional wording was added to policy BILL6 (Retaining and Enhancing the Vitality and Viability of Billingshurst Village Centre) to emphasise support for a mix of uses in the village centre – it was felt that promoting a range of uses including retail, office space, housing and cultural – would serve to help the High Street continue to thrive.
- 2.41. Historic England praised the Plan in its approach to the sympathetic bringing back into re-use of historical assets to create flexible workspaces. Originally set as an Aim, this was redrafted as a

policy to enable diversification of high streets that enable them to thrive as more flexible economic and social places.

- 2.42. Policy BILL9 (Tourism-related Development and Provision of Tourist Accommodation) was strengthened to ensure that any such development would be on accessible sites, ideally with easy connections to the village centre. This was felt to be a positive clause that would again support the use of the High Street, thus helping it to be sustainable as a local centre.
- 2.43. **Transport and movement:** Various comments related to the safety and accessibility of routes, particularly in congested areas such as outside schools. The policy promoting sustainable movement was felt to sufficiently promote the key movement routes in the parish (although the network of routes was extended to the existing HDPF site allocations shown on the map, to illustrate future linkages). These comments were dealt with more appropriately in the Non-Policy Actions section.
- 2.44. **Environment:** The comments were largely supportive of the Local Green Spaces. Site owners were informed at Regulation 14 of their inclusion in the Plan. Two Local Green Spaces were removed from the Plan following comments received: Jubilee Fields (as per para 2.38 above) and Adversane Green, because it is already protected as a Village Green. The list of Local Green Spaces was renumbered to enable easier read across on the map.
- 2.45. Policy BILL14 (Multi-value Sustainable Drainage Systems) attracted some comments, largely around the desire to strengthen the policy to enable, as far as possible, the ongoing maintenance of such facilities. An additional clause was therefore added to this effect, requiring developments to be supported by a drainage maintenance plan where appropriate.
- 2.46. The final policy in the Plan, BILL15, seeks to preserve views of St Mary's Church, an iconic heritage asset in the village. A number of respondents raised concerns about the policy being too restrictive in its current wording. This was amended to require development proposals to consider their impact on the view **to** the church spire (as opposed to also **from** the spire) and ensure that it does not have a significantly detrimental impact, rather than attempting to restrict development within any vantage point of the church.

#### **Stage V: Preparing the Submission (Regulation 16) Neighbourhood Plan**

- 2.47. Following the changes made to the Plan as a result of the Regulation 14 consultation, the amended Plan was approved at a meeting of Billingshurst Parish Council on 6 November 2019. The Submission Version was submitted to Horsham District Council for Regulation 16 Consultation in March 2020.

### **3 STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATION ASSESSMENT**

#### **Strategic Environmental Assessment**

- 3.1 The Plan and the process under which it was made conforms to the SEA Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 3.2 Horsham District Council (HDC) is the lead authority for the Billingshurst Neighbourhood Plan. It has issued a 'standard' screening for all Neighbourhood Plans within the district. This is included at Appendix C. This states that if a Neighbourhood Plan is allocating sites for development then it could have a significant environmental impact, therefore a Strategic Environmental Assessment (SEA) is required.
- 3.3 The Billingshurst Neighbourhood Plan does not allocate sites and it has been confirmed by HDC that an SEA is not required. Nevertheless, in July 2019, a Sustainability Statement was prepared to support the Pre-Submission (Regulation 14) Version of the Billingshurst Neighbourhood Plan. The statutory bodies (the Environment Agency, Natural England and Historic England) were consulted to assist in the determination of whether or not the Billingshurst Neighbourhood Plan would have significant environmental effects in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 3.4 Relevant representations were duly taken into account in the final version of the SEA that accompanies the Submission (Regulation 16) Version of the Plan.

#### **Habitats Regulations Assessment (HRA)**

- 3.5 Under Directive 92/43/EEC, also known as the Habitats Directive<sup>6</sup>, it must be ascertained whether the draft Plan is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulation Assessments (HRA). An appropriate assessment is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether or not it is necessary to undertake an assessment, a screening process is followed.
- 3.6 In July 2019, an HRA Screening Report prepared by Billingshurst Parish Council was published for consultation with Horsham District Council and Natural England (the statutory body) at Pre-Submission (Regulation 14) Stage. This considered that an HRA would not be required because the Plan is not likely to have significant impacts on European protected species or sites. In its representations to the Regulation 14 Consultation, Natural England did not raise any concerns about the findings of the HRA Screening Report.
- 3.7 The Screening Report, including the response from the statutory body, has been submitted at Regulation 16 stage as part of the evidence base for the Plan.
- 3.8 In addition to conforming to its EU obligations, the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights.

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<sup>6</sup> Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>.



## 4 CONCLUSION

- 4.1. The Working Group has undertaken a very thorough engagement programme in order to develop its Neighbourhood Plan. It has set out a comprehensive vision and objectives. In developing the policies to achieve the vision and objectives, the Working Group has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 4.2. Feedback from the Regulation 14 consultation has enabled the Plan to be shaped into its final version, to submit to Horsham District Council.
- 4.3. This report fulfils the requirements for the Consultation Statement, as set out in Regulation 15(2) of the Neighbourhood Planning Regulations 2012 (as amended).
- 4.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Working Group as well as those who have taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Neighbourhood Plan.

## Appendix A - Diary of significant engagement events and activities

The table below provides a summary of significant events and milestones that have taken place during the development of the Billingshurst Neighbourhood Plan.

In addition to the events described below, the Working Group has met over the course of the development period on largely a monthly basis.

Many other meetings and discussions have taken place between the Working Group and Horsham District Council Neighbourhood Plan officers, developers and representatives of developers, residents and businesses.

Results of all consultations alluded to in the Appendix below are on the website.

Date	Event/ Activity	Commentary
December 2015	Billingshurst Parish Council formally designated as a Neighbourhood Area	Agreement to proceed with making a Billingshurst Neighbourhood Plan and initial Committee established.
Spring 2016	Local Call for sites issued	Landowners and developers invited to submit their sites for consideration in the draft plan. Work begins on collating a robust site assessment pro forma against which to assess sites.
May 2016	External consultants engaged to support the Plan process.	Navigus Planning is contracted.
June 2016	Neighbourhood Plan officially launched with a stall at the annual Billingshurst Show	A manned stand with displays and opportunity for the public to set out their issues priorities using post-it notes and sticky dots. 212 residents contribute.
August 2016	Engagement event at the Flower Show	Issues and priorities engagement. 79 residents contribute.
September 2016	High Street Consultation – 1	Issues and priorities engagement. 55 residents contribute.
October 2016	Commuter Consultation	Issues and priorities engagement with targeted group. 44 residents contribute.
November 2016	High Street Consultation – 2	Issues and priorities engagement. 166 residents contribute.
	Church Consultation event (repeated in December)	Issues and priorities engagement. 36 residents contribute.
December 2016	Billifest engagement	Issues and priorities engagement. 359 residents contribute.
	Lions Club engagement	Issues and priorities engagement. 14 residents contribute.
January 2017	Weald School engagement	Issues and priorities engagement with targeted group. 50 students contribute.
	Scouts and Guides Executive Committee	Issues and priorities engagement with targeted group. 11 delegates contribute.

Date	Event/ Activity	Commentary
	Business engagement	Survey results collated from the business survey issued in October 2016 – 62 respondents.
	Billingshurst Centre Consultation – 1	Survey on the use of the centre and views on how to improve the village centre – 79 responses.
February 2017	Adversane Hall - Consultation	Issues and priorities engagement undertaken in Adversane. 26 residents contribute.
	Billingshurst Centre Consultation – 2	Survey on the use of the centre and views on how to improve the village centre – 49 responses.
March 2017	Billingshurst Centre Consultation – 3	Survey on the use of the centre and views on how to improve the village centre – 71 responses.
June 2017	Billingshurst Show	Consultation on the draft vision and objectives -
August 2017	Billingshurst Housing Needs Assessment (HNA) published	Undertaken by AECOM.
September / October 2017	Vision and objectives consultation	All households in the parish sent the draft vision and objectives for comment and an update on the Plan.
November 2017	Vision and objectives agreed	
December 2017 to January 2018	Option development workshops held	Three workshops held with invited delegates to start to consider how the objectives of the plan might be delivered, bearing in mind the feedback so far. 35 attended.
March 2018	Final site assessment results are collated	Decision still pending on whether to include sites or not, in light of the HNA findings and the emerging Local Plan Review.
February to August 2018	Workshop Report published Working Groups consider which options to pursue in the Plan	Working Group compiles evidence on each theme with a view to determining policy options for the Plan.
September to December 2018	Initial draft of the Billingshurst Neighbourhood Plan is drafted	To be submitted to HDC for informal comments.
January to April 2019	Horsham District Council undertake informal Health Check of the draft Plan	Comments are received in April 2019.
March 2019	HDC letter to parishes offering options on whether to include site allocations or not	The Working Group consider the options in the letter and undertake further discussions. A decision, with reasoning, is minuted in June 2019 not to progress site allocations at this time.
April to July 2019	Pre-Submission draft plan completed along with supporting documentation	Supporting documents include the evidence base and SEA/HRA Screening reports.
August to September 2019	Pre-Submission (Regulation 14) consultation	8 week consultation involving the community and statutory bodies, including two public events.

<b>Date</b>	<b>Event/ Activity</b>	<b>Commentary</b>
October 2019 to January 2020	Submission Version (Regulation 16) documents finalised and supporting documentation	To submit to HDC in March 2020.

**Appendix B - List of statutory consultees contacted and example letter**

County and District Contacts	Email addresses
Horsham District Council	<a href="mailto:neighbourhood.planning@horsham.gov.uk">neighbourhood.planning@horsham.gov.uk</a>
West Sussex County Council	<a href="mailto:planning.policy@westsussex.gov.uk">planning.policy@westsussex.gov.uk</a> <a href="mailto:caroline.west@westsussex.gov.uk">caroline.west@westsussex.gov.uk</a>
Surrey County Council	<a href="mailto:planning.consultations@surreycc.gov.uk">planning.consultations@surreycc.gov.uk</a>

Neighbouring Parish Councils
Wisborough Green Parish Council
Loxwood Parish Council
Rudgwick Parish Council
Slinfold Parish Council
Itchingfield Parish Council
Shipley Parish Council
Thakeham Parish Council
West Chiltonton Parish Council
Pulborough Parish Council

Other Organisations	Email Address
EDF Energy - Infrastructure Planning South	<a href="mailto:john.park@edfenergy.com">john.park@edfenergy.com</a>
Historic England	<a href="mailto:LondonSeast@historicengland.org.uk">LondonSeast@historicengland.org.uk</a>
Environment Agency - Solent and South Downs	<a href="mailto:planningssd@environment-agency.gov.uk">planningssd@environment-agency.gov.uk</a>
Highways England	<a href="mailto:info@highwaysengland.co.uk">info@highwaysengland.co.uk</a>
Natural England	<a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>
Network Rail	<a href="mailto:TownPlanningSE@networkrail.co.uk">TownPlanningSE@networkrail.co.uk</a>
Southern Water	<a href="mailto:planning.policy@southernwater.co.uk">planning.policy@southernwater.co.uk</a>
Sport England	<a href="mailto:planning.south@sportengland.org">planning.south@sportengland.org</a>
UK Power Networks	<a href="mailto:Luke.Hughes@UKPowerNetworks.co.uk">Luke.Hughes@UKPowerNetworks.co.uk</a>
West Sussex Local Forum Access Forum	<a href="mailto:wslaf@westsussex.gov.uk">wslaf@westsussex.gov.uk</a>

In addition to the statutory consultees, landowners and developers were contacted. All consultees, including a range of parties that the Working Group considered were likely to have an interest in the Plan, were sent variations of the following letter:

**Billingshurst Parish Council wishes to inform you of the  
Pre-Submission Consultation (Regulation 14)  
on the Billingshurst Neighbourhood Plan**

The details of how to make representations on the Pre-Submission Neighbourhood Plan are given below:

The Plan can be viewed in the following ways:

1. By electronic download, click [here](#)
2. The wider evidence base supporting the plan can be seen further down this page.
3. In hard copy at the following locations: Billingshurst Centre, Roman Way, Billingshurst. RH14 9QW or The Billingshurst Library, Mill Lane, Billingshurst, RH14 9JZ.
4. Consultation events were held at the Billingshurst Centre on 7th September 2019 and The Billingshurst Leisure Centre on 11th September 2019. All were welcome to attend these sessions.

The consultation period runs from **1st August to midnight on 29th September 2019**. No representations will be accepted after this closing date.

Representations can be made in the following ways:

1. By email to [neighbourhoodplan@billingshurst.gov.uk](mailto:neighbourhoodplan@billingshurst.gov.uk)
2. By post to Billingshurst Parish Council, Billingshurst Centre, Roman Way, Billingshurst, West Sussex RH14 9QW.

All representations must be accompanied by a name, address and, if relevant, the organisation you are representing.

In addition, HDC has undertaken a screening on the need for a *Strategic Environmental Assessment (SEA)*. It is of the opinion that, because the Billingshurst Neighbourhood Plan is not allocating sites for development, an SEA is not required.

Billingshurst Parish Council has separately undertaken a *Habitats Regulations Assessment (HRA)* screening and is of the opinion that the Billingshurst Neighbourhood Plan will not have any significant environmental impact on any European designated sites, therefore an HRA is not required. Billingshurst Parish Council invites representations on this from you or the organisation you represent. Please click either [SEA](#) or [HRA](#) to view the documents.

Please [click here](#) to view the Local Green Spaces Report.

If you have any queries, please contact:

Clerk to the Council  
Billingshurst Parish Council, Billingshurst Centre  
Roman Way, Billingshurst, West Sussex  
RH14 9QW  
Tel: 01403 782555

## APPENDIX C – Summary of Regulation 14 representatives and response from Working Group

The table below details the key points raised during the consultation. A full copy of the responses is provided on the Billingshurst Neighbourhood Plan website.

Respondent Ref:

- |                                      |                                   |   |
|--------------------------------------|-----------------------------------|---|
| 1. WSCC Asset Management and Estates | 16. No details                    | 32. Reside Developments                             |
| 2. Resident                          | 17. Gladman                       | 33. HDC   |
| 3. WSCC Rights of Way Team           | 18. Resident                      | 34. Billingshurst Sports and Recreation Association |
| 4. Resident                          | 19. Resident                      | 35. Historic England                                |
| 5. Natural England                   | 20. Aspen Corporate Services Ltd. | 36. Resident  |
| 6. Resident                          | 21. Resident                      | 37. Armstrong Rigg Planning                         |
| 7. Southern Water                    | 22. Resident                      | 38. Resident  |
| 8. Waverley Borough Council          | 23. Resident                      | 39. Resident  |
| 9. Resident                          | 24. CPA Property                  | 40. Hallam Land Management Ltd.                     |
| 10. Surrey County Council            | 25. CPA Property                  | 41. Turley  |
| 11. Resident                         | 26. CPA Property                  | 42. Judith Ashton Associates                        |
| 12. Resident                         | 27. Resident                      | 43. Resident  |
| 13. Resident                         | 28. CPA Property                  | 44. Henry Adams LLP                                 |
| 14. Resident                         | 29. WSCC                          |   |
| 15. Resident                         | 30. Rosier Business Park          |   |
|                                      | 31. Resident                      |   |

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
1	WSCC Asset Management and Estates (as a landowner)	<b>Policy BILL13: Local Green Spaces</b> <ul style="list-style-type: none"> <li>• Jubilee Fields(1)</li> <li>• Adversane Green(14)</li> <li>• Bypass Path (15)</li> </ul>	The WG notes that NPPF para 146 states that "Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of	Remove Local Green Spaces Jubilee Fields and Adversane Green from the Plan.

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		<p>Concern that these are owned by WSCC Estates on behalf of Highways Department. Land is required for potential future highways work and as such is not suitable to be designated as LGS.</p>	<p>including land within it”, which includes “local transport infrastructure which can demonstrate a requirement for a Green Belt location”. This would seem to address the concerns raised.</p> <p>However, the WG has agreed to remove two Local Green Spaces from the Regulation 16 version for the following reasons, based on other comments received at Regulation 14:</p> <ol style="list-style-type: none"> <li>1. Jubilee Fields: to</li> <li>2. Adversane Green, as it is already protected by Village Green status.</li> </ol>	
2	Resident	<ol style="list-style-type: none"> <li>1.Concerned about lack of housing allocations and not taking opportunity to shape where development goes.</li> <li>2.Objective 6: LGS sites do not extend to sites that might be valued in the future. Could we include an aspiration for a country park at the woodlands south of the railway?</li> <li>3.Little mention of industrial development – is there scope to try and move businesses from the existing Station Road estate to elsewhere,</li> </ol>	<ol style="list-style-type: none"> <li>1.WG has decided not to pre-empt Local Plan by allocating housing. Policy BILL1 sets out where development would not be appropriate.</li> <li>2.Future sites are beyond scope of LGS. Large wooded areas not generally appropriate for LGS designation. The area of woodland in question, however, is designated as ancient woodland and therefore safeguarded.</li> <li>3.This idea was discussed at length by the WG. The movement of businesses from one estate to another was felt to be outside the scope of the NDP. An action</li> </ol>	<ol style="list-style-type: none"> <li>1.No amendment required.</li> <li>2.No amendment required.</li> <li>3.No amendment required.</li> </ol>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		to reduce lorry movements in that part of town.	(17) has been included to explore this with individual businesses.	
3	WSCC Rights of Way Team	Supports the Plan – “pleased to note the various section which relate to the Public Rights of Way network and wider consideration to improving links around the area.”	Noted.	No amendment required.
4	Resident	<p><b>Policy BILL14:Multi-value sustainable drainage systems</b></p> <p>1. Suggests the Billingshurst Surface Water Management Plan is referenced here.</p> <p>2. Clause (c) – Can this clause be strengthened to ensure that agreed maintenance agreements are enforced? Also can it extend beyond SuDS to include the ditches, ordinary watercourses and ponds into which developers drain their surface water?</p>	<p>1. Verify if this document exists and whether it provides helpful background evidence for the neighbourhood plan.</p> <p>2. Enforcement is not within the gift of the planning system. WG could strengthen clause (c) to require development to be supported by a drainage management plan.</p>	<p>1. Reference document in list of evidence is relevant.</p> <p>2. Include additional community action to work with relevant partners to enforce drainage management agreements. Potential text for clause (c): <b>“Development proposals should be supported by a drainage scheme maintenance plan which demonstrates a schedule of activities, access points, outfalls and any biodiversity considerations. The maintenance plan should also include an indication of the adopting or maintaining authority or organisation and may require inclusion within a register of drainage features”.</b></p>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		3. Provides useful photographic evidence of surface water flooding?	3. Noted as helpful.	3. Include photos in this section of the plan as illustrative examples of flooding locally.
5	Natural England	No specific comments; general guidance enclosed	Noted.	No amendment required.
6	Resident	Concerned about the lack of school places in light of the amount of housing planned for the area.	Planning for school places is the responsibility of the local education authority (WSCC). The NP includes an Aim to work with partners to ensure adequate education (and health) infrastructure is in place.	No amendment required.
7	Southern Water	<p>1. <b>BILL1: Built-up area boundary</b> - current wording could create barrier to statutory utility providers from delivering essential infrastructure required to serve existing and planned development. Suggests changing the 'and' to 'or' in Part B clauses.</p> <p>2. <b>BILL13: Local green spaces</b> – current wording could create barrier to statutory utility providers from delivering essential infrastructure required to serve existing and planned development. Suggest add: <b>“or it can be demonstrated that very special circumstances exist, for example where it is essential to meet specific necessary utility infrastructure needs and no feasible alternative site is available.”</b></p> <p>3. Recommend additional policy to support provision of utilities infrastructure as</p>	<p>1. Agree.</p> <p>2. Agree.</p> <p>3. The SG has no objection to including such a policy.</p>	<p>1. Amend Part B of Policy BILL1 as suggested.</p> <p>2. Amend Part B of Policy BILL14 as suggested.</p> <p>3. Policy to be inserted after Policy BILL5 (Burial Space). Wording:</p>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		required: <b>“New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.”</b>		The Neighbourhood Plan intends to ensure that new development is integrated into and well connected to the local infrastructure network – including communications, transportation and utilities - and for adequate utilities and infrastructure to be in place. Policy: <b>“New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan. It will be secured, as necessary, by relevant Section 106 Agreements linked to planning permissions.”</b>
8	Waverley Borough Council	No comment as no housing being allocated.	Noted.	No amendment required.
9	Resident	1.Supports need for adequate car parking at new homes.  2.Concerned that 3x Village Greens are not designated as Local Green Spaces.	1.Noted.  2.Village Greens are already afforded protection and therefore LGS would not offer anything additional.	1. No amendments required.  2. Adversane Green removed as Local Green Space as it is already afforded protection, having Village Green status.

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
10	Surrey County Council	No comments.	Noted.	No amendments required.
11	Resident	Raises concerns about lack of traffic calming through the village and lack of enforcement of traffic speeds.	The Plan includes an Aim to consider part-pedestrianisation of the High Street and policies to encourage safe foot/cycle within the village and centre. Enforcement is beyond the scope of the NP.	No amendments required.
12	Resident	Can reference be made to the newly published WSCC Cycling Design Guide?	Agree.	Make reference within Policy BILL10 and include in evidence list.
13	Resident	1.Concerned about impact of additional housing on already overstretched infrastructure.  2.Little mention of industrial development – is there scope to try and move businesses from the existing Station Road estate to elsewhere, to reduce lorry movements in that part of town.	1.The NP does not allocate housing, as it does not wish to pre-empt the new Local Plan. Policy BILL1 sets out where development would not be appropriate.  2. This idea was discussed at length by the WG. The movement of businesses from one estate to another was felt to be outside the scope of the NDP. An action (17) has been included to explore this with individual businesses	No amendments required.
14	Resident	Supports the provision for cycling and walking in the village centre. Would be keen to see support for 'home zones', including for instance, traffic calming, reduced parking hours in village centre, which would help to reduce traffic.	Traffic calming and parking restrictions are outside the scope of the NP. However, the Plan includes an aim to explore part-pedestrianising the village centre.	Include in Section 11, an additional action, “ <b>encourage other forms of transport into the Village Centre</b> ”.
15	Resident	<b>Policy BILL13: Local green spaces</b> – would like to nominate the grassed area with tree in front of house numbers 42, 44, 46, 48, 50 and 52 in	There are many similar areas of grassed areas located within housing areas across the parish. Generally speaking, these were	No amendments required.

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		Broomfield Drive to be formally designated as a Local Green Space in the Neighbourhood Plan. This attractive green is frequently used by children who like to play under the tree. It is also used by residents of Broomfield Drive for communal events and is viewed as an important open natural area between the houses.	designed into the housing areas when they were developed. The WG consider such spaces to comprises largely verges or other small piece of land on or adjacent to the highway and not demonstrably special with regards the NPPF criteria.	
16	No contact details	Would like to see additional supporting information in the plan to express the extent of flooding as a problem.	Noted although unclear what the source of the information provided is.	Additional photographic evidence included in the Plan.
17	Gladman	<p>1.<b>BILL1: Built up area boundary</b> – objects to the use of BUABs to restrict development that might otherwise be sustainable. Suggests policy should be more flexible. This would also negate the need for Aim 1.</p> <p>2.<b>BILL13: Local green spaces</b> – suggests that some of the LGSs nominated are 'extensive tracts of land' and therefore unsuitable.</p> <p>3.<b>BILL15: Views to and from St Mary's Church</b> – considers that protecting all views to and from</p>	<p>1.The purpose of the BUAB is to direct development to the most appropriate location, in line with Policy 3 of the HDPF. The NP has redefined the boundary to include allocated sites. Policy 4 of the HDPF suggests that sites can be allocated outside the BUAB, where that adjoin it. As the NP does not seek to allocate housing, in order not to pre-empt the growth strategy of the emerging Local Plan, it is justified in focussing development within the settlement boundaries.</p> <p>2.There is no given upper limit to what constitutes an 'extensive tract of land'. Indeed, there are examples of plans designating sites of 29ha as LGSs.</p>	<p>1. No amendments required.</p> <p>2. No amendments required.</p>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		the church is too restrictive. Recommend identifying the most iconic views to and from the church.	3.The church, within the Conservation Area, is a listed building and The Design Statement for the Parish of Billingshurst sets out that protecting views of the spire is important. Whilst identifying specific 'exemplary' viewpoints would be helpful, there are felt to be so many of these that it would become onerous.	3. Amend the policy to protect views 'to' the Church not from it. Amend policy wording to require proposals to consider the impact on the view of the church spire and ensure that it is not significantly detrimental.
18	Resident	Comments generally supporting the approach of the Neighbourhood Plan.	Noted.	No amendments required.
19	Resident	Supports the Plan, in particular the call for (part) pedestrianisation of the High Street and public realm improvements. Concern that financial services are not mentioned as being an important asset to attract to the village.	Noted, some of the comments are beyond the scope of a NP.	No amendments required.
20	Stantec on behalf of Aspen Corporate Services Limited	<p>1. <b>Policy BILL1: Built up area boundary</b> – concerned that clause B(i) does not provide sufficient detail as to what constitutes 'appropriate uses in the countryside'.</p> <p>2. Promotes the merits of allocating land at Okehurst Lane.</p>	<p>1. The NP conforms to the HDPF and the NPPF (2019), both of which include further detail on this.</p> <p>2. The NP is not seeking to allocate sites.</p>	<p>1. Include NPPF Paras 83a and 84 in the conformity reference.</p> <p>2. No amendments required.</p>
21	Resident	<p>Main planning concerns:</p> <p>1. Concerned about lack of protection of green space/ woods to the south of A272/East of Billingshurst.</p>	<p>1.Some of the woods mentioned are designated as 'ancient woodland'. The NP directs development to within the BUAB.</p>	<p>1.No amendments required.</p> <p>2.No amendments required.</p>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		<p>2. Why has the BUAB been amended to include allocated housing currently outside the existing BUAB?</p> <p>3. Concerns about lack of supporting infrastructure – health, schools etc.</p>	<p>2.Areas included within the Built-up Area Boundary must conform to relevant local and national policy to ensure the most appropriate use of land. Outside the boundary only uses appropriate to a countryside location are acceptable. The BUAB should include existing commitments and new development adjacent to the boundary. This includes sites allocated for development in the HDPF.</p> <p>3.The NP includes an Aim to work with partners to ensure adequate education and health infrastructure is in place.</p>	<p>3.No amendments required.</p>
22	Resident	<p>1. Concerned that 2011 data is out of date.</p> <p>2. Reference to Billingshurst being a 'Larger Village' is disingenuous</p> <p>3. Extending the BUAB</p>	<p>1. This is noted but ultimately it does not dictate the direction of the Plan. Council tax receipts will only tell you the number of properties, not any other data about the population.</p> <p>2. Larger Village is the classification in the settlement hierarchy of the HDPF and is not our classification.</p> <p>3. The point is noted. However, this is the requirement of the planning system and does not materially change the way that growth is dealt with. The planning system is not the cause, it is responding to a central</p>	<p>1. No amendments required</p> <p>2. No amendments required</p> <p>3. No amendments required</p>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		<p>4. Brownfield first</p> <p>5. Loss of natural habitat and green spaces</p> <p>6. Brick deserts</p> <p>7. Community well-being compromised</p> <p>8. Parking</p>	<p>government requirement to build more homes. The extension simply reflects sites that have planning permission or that have been built since the old BUAB was drawn. The NP cannot prevent any sites with planning permission from being built.</p> <p>4. This is noted. For future growth, BILL1 provides a framework for this.</p> <p>5. This is noted. BILL13 protects a number of green spaces</p> <p>6. This is noted. BILL14 seeks to ensure that development protects and enhances wildlife and biodiversity.</p> <p>7. This is noted. The NP is not explicitly proposing any significant scales of new development and seeks to improve movement for non-vehicular traffic through the movement routes in BILL10.</p> <p>8. This is an issue that the WG looked at as part of the development of the Plan. An action has been identified in Section 11 relating to improving car parking at the station.</p>	<p>4. No amendments required</p> <p>5. No amendments required</p> <p>6. No amendments required</p> <p>7. No amendments required</p> <p>8. No amendments required</p>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		9. Strain on local infrastructure	9. The point is noted. CIL is a non-negotiable payment from development, with the NP meaning that a larger share comes directly to the Parish Council to spend as it sees fit. The developer has no right of negotiation over this payment. Funding for schools, social care and health are all acknowledged to be issues but are not entirely about planning – if funding for these things is to come through the planning system then more development would need to be accepted. The issue of the graveyard is noted – the NP was unable to identify land in a suitable location for this with a willing landowner.	9. No amendments required
23	Resident	1. New housing  2. Development in Adversane  3. New businesses	1. The NP does not propose any significant new housing.  2. Adversane is not a settlement where growth is proposed or where significant growth is sustainable.  3. Policy BILL6 of the NP seeks to improve the vitality of the High Street. Section 7 of the Plan also has specific aims to provide more workspaces.	1. No amendments required  2. No amendments required  3. No amendments required

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
24	CPA Property on behalf of Universal Trailers Ltd, Menzies Wood Farm	Promotion of land for employment allocation	For a number of reasons, including the impending review of the HDPF, the WG took the decision not to allocate sites for development. This may be considered as part of an early review of the NP.	No amendments required
25	CPA Property on behalf of the owners of St Andrews Hill Farm	Promotion of land for employment and residential allocation	For a number of reasons, including the impending review of the HDPF, the WG took the decision not to allocate sites for development. This may be considered as part of an early review of the NP.	No amendments required
26	CPA Property on behalf of the owners of land at Charles Wadey Builders Yard and McVeigh Parker Agricultural Supplies	Promotion of land for employment allocation	For a number of reasons, including the impending review of the HDPF, the WG took the decision not to allocate sites for development. This may be considered as part of an early review of the NP.	No amendments required
27	Resident	<ol style="list-style-type: none"> <li>1. Description of transport links as 'excellent'</li> <li>2. Widening roads and moving station</li> <li>3. Movement Route E should be extended and have consistent reference in the key.</li> </ol>	<ol style="list-style-type: none"> <li>1. Point is noted and agreed. Amend along with description</li> <li>2. Point is noted although such things are very costly and would require significant amount of development to justify/fund them</li> <li>3. Point is noted and agreed.</li> </ol>	<ol style="list-style-type: none"> <li>1. Delete 'excellent' and reflect narrative in paras 3.25-3.28.</li> <li>2. No amendments required.</li> <li>3. Extend Movement Route E to the east?</li> </ol>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		<p>4. Aim 5 routes not marked on the Policies Map</p> <p>5. Lack of wildlife-friendly policies</p> <p>6. Land for self-build</p> <p>7. Fig 6.1 – play area in the grounds of the Women’s Hall</p> <p>8. Appendix D weblink</p> <p>9. Section 7.5, reference to BILL11</p>	<p>4. Aims are distinct from policies and are not subject to consideration as part of any planning application – they are actually projects and none of these routes have been explicitly identified and as they are not policies they should not be shown on the Policies Map.</p> <p>5. Noted.</p> <p>6. This is noted. It was not an issue that was raised through the development of the NP and the imminent review of the HDPF is likely to address this.</p> <p>7. Agree this could be added to Figure 6.1</p> <p>8. Noted. Will be amended.</p> <p>9. Noted. Will be amended.</p>	<p>4. No amendments required.</p> <p>5. Additional clause added to Policy BILL2 to encourage development to consider biodiversity.</p> <p>6. No amendments required.</p> <p>7. Amend Figure 6.</p> <p>8. Update Appendix D weblink</p> <p>9. Amend para 7.5 to refer to correct policy numbering</p>
28	CPA Property on behalf of the owners of land and buildings at Hilland Farm	Promotion of land for employment allocation	For a number of reasons, including the impending review of the HDPF, the WG Steering Group took the decision not to allocate sites for development. This may	No amendments required

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
			be considered as part of an early review of the NP.	
29	West Sussex County Council	<ol style="list-style-type: none"> <li>1. Para 5.8 – reference to WSCC Parking Standards and Manual for Streets</li> <li>2. Education provision – reference to WSCC School Places document</li> <li>3. Para 7.5 – pedestrian safety and car parking</li> <li>4. Policy BILL11(A) – compliance with NPPF</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted and agreed</li> <li>2. Noted and agreed</li> <li>3. Noted. This section identifies issues and it would deflect from this if too much detail was provided about who should be involved in delivering the solutions.</li> <li>4. Disagree – the NPPF does not say that an application can only be refused on parking where there would be a severe residual impact. It says that 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' The loss of public car parks is a different matter and the consultation revealed widespread support for safeguarding car parking space.</li> </ol>	<ol style="list-style-type: none"> <li>1. Text to be added to para 5.8 regarding WSCC Parking Standards and Manual for Streets.</li> <li>2. Text to be added to para 6.10 reflecting latest position.</li> <li>3. No amendments required</li> <li>4. No amendments required.</li> </ol>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		5. Policy BILL12A – compliance with NPPF	5. As above. It is considered that development without off-street parking would have a severely detrimental impact and this is why the WSCC Parking Standards have certain requirements for parking provision.	5. No amendments required.
30	Rosier Business Park Ltd	Promotion of land for employment and residential allocation	For a number of reasons, including the impending review of the HDPF, the NP Steering Group took the decision not to allocate sites for development. This may be considered as part of an early review of the NP.	No amendments required
31	Duplicate of #36	N/a	N/a	N/a
32	Reside Developments	No comments	Noted	No amendments required
33	Horsham DC	Not all Local Green Spaces proposed may fulfil the criteria	Noted.	Two Local Green Spaces have been removed.
34	Billingshurst Sports Recreation Assoc.	Provision of a 4G astroturf pitch at Jubilee Fields to support the growth of Billingshurst FC	Noted. This could be a specific requirement of BILL4Aiii.  This raises a possible conflict between BILL4Aiii and the proposal for Jubilee Fields to be a Local Green Space. Whilst the LGS designation wouldn't restrict the ability to 'modernise' on the same footprint, it would restrict any development on undeveloped space. This may not prevent a 4G pitch but could prevent, for example, the provision of	A reference to a 4G pitch has been added to BILL49Aiii.  Jubilee Fields has been removed as a Local Green Space, to ensure its future potential is not stifled by the designation. The site is owned by Billingshurst Parish Council in any case, which is felt to afford it adequate protection.

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
			floodlighting columns and a maintenance hut.	
35	Historic England	<p>1. Notes elements of NP that should be held up as particularly good practice, including specific advice on energy efficiency retrofit in historic buildings and the provision for temporary use of vacant business premises in the town centre and the reuse of historic buildings in the village centre.</p> <p>2. <b>Policy BILL7: Public realm and movement in Billingshurst village centre</b> - could be enhanced for the sake of clarity as it would suggest in its present wording that demolition of buildings simply to widen pavements would be considered supportable.</p> <p>3. <b>Policy BILL15: Views to and from St Marys Church</b> – too restrictive. Suggest identifying those views of the church that are considered to contribute most strongly to its significance, to which the policy should apply.</p> <p>4. <b>Aim 4:</b> would like to see developed as a policy, as this would provide a leading example of policy to enable diversification of high streets that enable them to thrive as more flexible economic and social places.</p>	<p>1. Noted.</p> <p>2. Noted and agreed.</p> <p>3. Agreed.</p> <p>4. WG agree this would be helpful and would like to incorporate support for 'mixed use' – e.g. housing, retail, cultural, community, office, flexible work space' within policy BILL6. In addition, a new policy has been added on flexible workspace.</p> <p>5. Agreed.</p>	<p>1. No amendments required.</p> <p>2. Include additional text to specify that this would not be acceptable where a building might be demolished or significantly impacted.</p> <p>3. See Row 17 of this table, point 3.</p> <p>4. Policy BILL6 amended and a new Policy inserted into the Economy section.</p>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		5. <b>Sustainability Appraisal</b> – upgrade BILL8 assessment to ++ against heritage.		5.Amend SA as described.
36	Resident	Concerned about safety around schools (vis a vis roads and traffic). Puts forward various suggestions.	Some of the suggestions are planning related, for instance widening footpaths, and provision for this is made within Policy BILL10. Others are more relevant to the Non-Policy Actions.	Suggestions included in the Non-Policy Actions Section 11.
37	Armstrong Rigg	<p>Representing a client in respect of land north of Hilland Farm for a commercial scheme.</p> <ol style="list-style-type: none"> <li>1. <b>Objective 4:</b> suggest rewording to be more explicit about encouraging industrial activity away from the railway station.</li> <li>2. <b>Issues for Billingshurst:</b> <ol style="list-style-type: none"> <li>a. Suggests including following wording against retail provision: <b>“Where suitable in-centre sites are not available preference should be given to accessible sites well connected to the village centre.”</b></li> <li>b. Suggests additional wording against workspace: <b>“fit for purpose business space”</b> and provision for moving businesses away from the station.</li> <li>c. Suggests additional text for housing to serve needs of aging population.</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1. Objective 4 already includes the need to focus such activity in appropriate areas of the parish.</li> <li>2. Issues: <ol style="list-style-type: none"> <li>a. The engagement process revealed strong support for concentrating retail provision in the village centre, rather than dispersing it throughout the village.</li> <li>b. Agree with addition of fit for purpose business space. As the Plan is not allocating sites, including explicit wording about moving businesses away from the station area is an aspiration at this stage, but could be reviewed in the NP early review.</li> <li>c. Not felt to be necessary.</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1.No amendments required.</li> <li>2.Issues: <ol style="list-style-type: none"> <li>a. No amendments required.</li> <li>b. Include bold text here in issues.</li> <li>c. No amendments required.</li> </ol> </li> </ol>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		<p>3. <b>Policy BILL1: Built up area boundary</b> – map (and policies map and Figures 6.1 and 8.1) should be amended to include, within the amended BUAB, the extant permission for the Dunmoore site north of Hill Farm (DC/18/2122); various comments on the wording of the policy.</p> <p>4. <b>Policy BILL2: Housing design and character</b> – Clause B is overly prescriptive.</p> <p>5. <b>Policy BILL6: Retaining and enhancing the vitality and viability of Billingshurst village centre</b> – suggests additional wording to enable development to take place outside village centre, subject to sequential test.</p> <p>6. <b>Policy BILL9: Tourism-related development and provision of tourist accommodation</b> – suggestion to add additional clause for developments outside the BUAB.</p>	<p>3. The WG discussed this point and agreed that the Plan should not include sites with extant permissions and that these can be reviewed when the Plan is reviewed.</p> <p>4. Disagree as policy encourages “<b>where possible</b>”. Clause (v) mentions parking solutions particularly favoured by local residents, as evidenced in the local engagement.</p> <p>5. Locals favoured focussing retail provision in the village centre. In any case, sequential test included at HDC level.</p> <p>6. Agree to adding that developments should be in “<b>accessible sites, well connected to the village centre and the built-up area of Billingshurst</b>”.</p>	<p>3. Maps to be amended to remove sites with extant planning permissions; Amend clause B(iii) to it represents the appropriate provision of <del>tourist activities and facilities</del>, <u>tourism facilities, accommodation, attractions and activities</u>, where it meets the requirements of Policy BILL9.</p> <p>4.No amendments required.</p> <p>5.No amendments required.</p> <p>6.Add wording to clause (iii). [also move wording about car parking to new clause].</p>

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		7. <b>Figure 8.1: Key Movement Routes</b> – should include the site with extant pp. Should also indicate routes that are committed as part of development allocations, even if they have not yet been constructed.	7. Agree that future, committed routes, within allocated sites, could be included, when the plan is reviewed	7. Amend map to include committed routes.
38	Resident	<b>Policy BILL10: Protection and Enhancement of Key Movement Routes</b> Would like a new footpath to be developed place on the east side of Alicks Hill from the top of Station Road south to the Weald School.	This particular route was not raised during the engagement process. The Key Movement Routes policy is based on enhancing existing routes rather than providing new routes. This could be added as a Non-Policy Action regarding identifying and securing new walking routes.	Consider whether this might be added as a Non-Policy Action.
39	Resident	Can more be done to improve safety for pedestrians near to schools, particularly Primary School in Station Road?	Section 8 of the Plan seeks to improve walking and cycling opportunities in the parish, specifically noting the issues at schools. Policy BILL10 identified the route in question as a key movement route, to attract investment and safety measures including greater access.	No amendments required to the policy, but a new Non-Policy Action to be added to Section 11 to work with partners to explore options for improved signage and safety options near to schools.
40	Hallam Land Management Limited	Site details submitted (Brookhurst Green). 1. <b>Policy BILL4: Provision of Leisure and Recreation Facilities</b> – welcomes policy.  2. <b>Policy BILL10: Protection and Enhancement of Key Movement Routes</b> – suggests an additional key movement route.	1. Noted.  2. The route identified would enable a connection to the site submitted. As the NP is not seeking to allocate sites and the site has yet to gain planning permission, it would be premature to identify this as a Key Movement Route. This can be reviewed as part of the early NP review.	1. No amendments required.  2. No amendments required.

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
41	Turley	Provides details of site being promoted at Land at Bridgewater Farm, Billingshurst.	Noted.	No amendments required.
42	Judith Ashton Associates	Provides details of site being promoted at Marringdean Road, Billingshurst. Queries whether the NP meets the Basic Conditions as it is not seeking to allocate sites, which it suggests is not a positive approach to plan making.	There is no obligation for NPs to allocate sites for housing. In agreement with HDC, the NP is seeking to undertake an early review to consider the implications of the emerging Local Plan, which is not at an advanced enough stage to provide strategic context for the NP.	No amendments required.
43	Dr J. L. Mulder	<p>1. Traffic concerns: would support schemes that minimise lorry movements along Stane Street. Concerned about pedestrian safety.</p> <p>2. Sets out ideas for developer contributions to be spent on.</p> <p>3. Need to consider climate change – can all developments include tree planting?</p>	<p>1. Traffic calming/ enforcement/ redirecting is not a planning matter. Policy BILL10 supports improvements to Key Movement Routes, including widening of pavements.</p> <p>2. Section 10 of the NP identifies an action for the Parish Council to set out a Spending Priority Schedule for developer contributions to be spent on.</p> <p>3. Policy BILL3 focuses on energy efficiency in design and supports proposals that maximise sustainability in their design. Tree planting could be encouraged within this.</p>	<p>1. No amendments required.</p> <p>2. Action to be carried out once the NP is made.</p> <p>3. Introduce an additional clause to support tree planting in new developments (potentially encouraging trees that are particularly climate change friendly).</p>
44	Henry Adams LLP	Submission of site for consideration during the early review of the NP.	Noted.	No amendments required.
45	Slinfold Parish Council	It may be worthwhile for the parish councils, should they so wish, to include a section to	Noted. The NP doesn't explicitly seek to address housing needs. Concern over	No amendments required.

Ref.	Name of body/ 'Resident'	Representation	Response by Responsible Body	Amendment to Plan
		<p>guard against C2 (residential institutions) developments as opposed to C3, residential. There is potential for C2 to be used to get around some NP and HDPF clauses as evidenced by the current proposals in Slinfold and Itchingfield.</p> <p>As NPs usually deal with housing, the lack of a C2 section may be a hole that developers seek to exploit.</p>	<p>development of C2 residential institutions was not an issue raised by the community so it would not be appropriate to address in the Plan.</p>	

## APPENDIX D - Horsham District Council SEA Screening Opinion



Horsham  
District  
Council

Strategic Environmental Assessment

Screening Opinion

Many thanks for your screening opinion and for providing an indication of what the Neighbourhood Development Plan (NDP) is aiming to achieve.

The EU legislation under Strategic Environment Assessment (SEA) Directive 2001/42/EC, Paragraph 2 of the SEA Regulations 2001/42/EC states that an SEA is mandatory for plans/programmes which are: are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste/ water management, telecommunications, tourism, town & country planning or land use and which set the framework for future development consent of projects listed in the EIA Directive.

To ensure compliance with the legislation, HDC have taken a uniform approach to screening and require all NDP's allocating sites for housing development to undertake an SEA.

We also recommend a Sustainability Appraisal (SA) is also carried out as this will help demonstrate how the NDP accords with the principles of sustainable development. These two processes can be carried out in conjunction in a combined SA/SEA, which is our preferred approach.

We would welcome the opportunity to provide comments on the Scoping Report and would be happy to review a Draft prior to the formal submission of the NDP. We recommend the District's SA Scoping Report is used as a starting point for your SA work.

With regard the Habitats Regulation Assessments (HRA),if the Plan area is within a 15 km search area of internationally important sites designated for their ecological status (Natura 2000 (N2K)sites or European Sites), a HRA may be required. Please refer to the HRA: A toolkit to support HRA Screening and Appropriate Assessment of Plans [http://www.caerphilly.gov.uk/pdf/Environment\\_Planning/LDP-Examination-Documents/SEW4.pdf](http://www.caerphilly.gov.uk/pdf/Environment_Planning/LDP-Examination-Documents/SEW4.pdf)

Should a HRA be required we would advise early consultation with Natural England.