

Barns Green & Itchingfield Neighbourhood Plan Consultation Statement



April 2020

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1. INTRODUCTION

- 1.1. This Consultation Statement has been prepared by DOWSETTMAYHEW Planning Partnership for, and on behalf of, Itchingfield Parish Council (IPC). It is in support of the preparation of the Itchingfield Neighbourhood Plan (INP).
- 1.2. This Statement contains a chronology of the stakeholder engagement that has taken place as part of the preparation of the INP, the main issues that have emerged through this process, and how they have been addressed. It sets out how preparation of the INP accords with the Neighbourhood Planning (General) Regulations 2012.
- 1.3. This Statement sets out a summary of the Legislative Background (Section 2); the Background to the Itchingfield Neighbourhood Plan (Section 3); a Chronology of the Consultation Process 2016-2019 (Section 4); the Main Issues Arising from Engagement (Section 5); Pre-submission Itchingfield NP & SA: Consultation (Section 6); the Main Issues Arising Through Consultation on the Pre-submission Neighbourhood Plan (Regulation 14) (Section 7); How the Main Issues Have Been Considered (Section 8); Preparation of Submission Documents (Section 9); and a Summary is provided at Section 10.
- 1.4. This Statement illustrates the level of public engagement undertaken at every stage of the process and how stakeholder consultation has been key to, and positively shaped, the INP and its preparation.

2. LEGISLATIVE BACKGROUND

- 2.1. The requirement for a Consultation Statement to accompany the Submission Version (Regulation 16) INP is set out in the Neighbourhood Planning (General) Regulations 2012.
- 2.2. Regulation 15(1) states that “Where a qualifying body submits a plan proposal to the local planning authority, it must include...” amongst other things 15(1)(b) “a consultation statement.”
- 2.3. Regulation 15(2) states that a Consultation Statement means a document which:

- (a) *“contains details of the people and bodies consulted about the proposed neighbourhood development plan;*
- (b) *explains how they were consulted;*
- (c) *summarises the main issues and concerns raised by those consulted; and*
- (d) *describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.”*

- 2.4. This Statement includes a summary of the consultation exercise as part of the preparation of the INP, undertaken in accordance with Regulation 14 of the Neighbourhood Plan (General) Planning Regulations 2012.

2.5. Before submitting a Plan proposal to the Local Planning Authority, a qualifying body must:

- (a) publicise, in a manner that is likely to bring to the attention of people who live, work or carry on a business in the neighbourhood area -
 - (i) details of the proposals for a neighbourhood development plan;*
 - (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;*
 - (iii) details of how to make representations; and*
 - (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;**
- (b) consult any consultation body referred to in Paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and*
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.”*

2.6. The preparation of the INP has been undertaken in accordance with these regulatory requirements.

3. BACKGROUND TO THE ITCHINGFIELD NEIGHBOURHOOD PLAN

- 3.1. IPC resolved to prepare a Neighbourhood Plan in June 2015. Horsham District Council (HDC) subsequently approved the designation of the Neighbourhood Plan Area in September 2015.
- 3.2. A Neighbourhood Plan Steering Group (NPSG) was formed in September 2015 to progress the preparation of the INP on behalf of IPC.
- 3.3. It was recognised that key to a successful Neighbourhood Plan would be the support of local residents and other stakeholders. Intrinsic to securing such support would be to ensure engagement with these stakeholders throughout the Plan preparation process.
- 3.4. It was agreed the preparation of the INP would be undertaken in a transparent and inclusive manner.
- 3.5. Throughout the Plan preparation process, the NPSG have sought to ensure that local residents, their representatives, local businesses, interest groups and wider interested parties, including statutory and regulatory bodies, have been actively consulted and their views sought.

- 3.6. A dedicated webpage has been established with reports and updates regularly provided online on the IPC website.
- 3.7. The overarching principles of the stakeholder engagement process has been to engage in a manner that is extensive, effective, inclusive, fair, transparent and proportionate.

4. CHRONOLOGY OF CONSULTATION PROCESS: 2015 - 2020

- 4.1. This section provides a chronological overview of the consultation stages undertaken as part of the production of the INP.

Neighbourhood Plan Steering Group Meetings: 2015-2020

- 4.2. The initial NPSG meeting took place on 21 September 2015. It was formed to process and prepare the INP on behalf of IPC.
- 4.3. Membership of the NPSG comprises a mix of volunteers and Parish Council Members. Meetings were held on a regular basis throughout the plan making process to discuss and prepare key documents.

Household Survey Questionnaire: June 2016

- 4.4. A Household Survey Questionnaire was sent to households in the parish in June 2016.
- 4.5. Local stakeholders were asked for their views on many aspects of life in Itchingfield and Barns Green. In particular, the Questionnaire asked what stakeholders considered:
 - Good and not so good about the Parish;
 - Must be preserved? and
 - Could be improved.
- 4.6. The responses from the 'Household Survey Questionnaire' were analysed by Action in Rural Sussex (AirS) during August and their report was submitted to IPC for review on 19 September 2016.
- 4.7. A Public Consultation Meeting was held on 21 October 2016 to: report on the Questionnaire results; discuss the INP; and explore the way forward.
- 4.8. Details relating to the questionnaire and results are available to view in Appendix 1.

Call for Sites: November 2016

- 4.9. A 'Call for Sites' was undertaken in November 2016. Landowners and/or agents were contacted and asked to propose sites within the Parish which should be considered for development.
- 4.10. In addition public advertisements and notices were set up to publicise the 'Call for Sites'.
- 4.11. Details relating to the 'Call for Sites' are available to view in Appendix 2.

Public Consultation Meeting: Vision and Objectives: February 2017

- 4.12. The Vision and Objectives of the INP were initially drafted by Members of the NPSG in December 2016
- 4.13. A Public Consultation Meeting was held in February 2017 where the Vision and Objectives were presented and feedback invited.
- 4.14. Details relating to the Vision and Objectives are available to view in Appendix 3.

Site Assessments: March -June 2017

- 4.15. A total of 29 sites were received in response to the Call for Sites. Sites comprised:
 - 1. Land at Wellcross Grange, Farm Cottage and Wellcross Lodge, near Broadbridge H
 - 2A Land west of Christ's Hospital Station.
 - 2B Land East of Five Oaks Road, Itchingfield.
 - 3. Land at "Wheatcroft", Bashurst Hill (2 plots).
 - 4. Land at "Wardcot", Fulfords Hill, Itchingfield.
 - 5. Land at "Bailings", Fulfords Hill, Itchingfield.
 - 6. Land at "Church Farm:", Fulfords Hill, Itchingfield.
 - 7. Land at the Old School, Itchingfield and attached former playing fields.
 - 8. Land at Plumtree Cross, Itchingfield.
 - 9. Land at, Sharpenhurst Farm, Itchingfield.
 - 10.Land at Muntham Home Farm, Barns Green.
 - 11.Land near Ark cottage, Plumtree Cross Lane, Barns Green.
 - 12.Land rear of Hele Farm, Sandhills Road, Barns Green.
 - 13.Land fronting Sandhills Road, Barns Green.
 - 14.Land at Hele Farm, Sandhills Road, Barns Green.
 - 15.Land at "Warrenhurst" Plumtree Cross Lane, Barns Green.
 - 16.Land at "Ropers" and "Cheffins" fields, Barns Green.
 - 17.Land behind "Sunnycroft", Two Mile Ash Road, Barns Green.
 - 18.Land at Muntham Drive, Barns Green.
 - 19.Land at Sumners Ponds, Chapel Road, Barns Green.

20. Land at Batchelors Farm, Emms Lane, Barns Green.
21. Land at the rear of Cross Lane, Barns Green.
22. Land at “The Glades”, Trout Lane, Barns Green.
23. Land at Two Mile Ash Road, Barns Green (later withdrawn).
24. Land at Two Mile Ash Road, Barns Green.
25. Land at Richmond Farm, Two Mile Ash Road (3 plots).
26. Land at Richmond House, Rye Farm Lane, Barns Green.
27. Land adjacent to Rye Farm House, Rye Farm Lane, Barns Green.
28. Land at Chapel Road, Barns Green.

- 4.16. All sites received were subject to a site assessment process which identified the environmental and policy constraints of each of the sites.
- 4.17. Details relating to the Site Assessment are available to view in Appendix 4.

Public Consultation Meeting: June 2017

- 4.18. A Public Consultation Meeting was held on 26 June 2018 .
- 4.19. The meeting provided an opportunity to update stakeholders/local residents on plan preparation.
- 4.20. Details relating to the Public Consultation Meeting are available to view in Appendix 5

Developer Presentations: July 2017

- 4.21. The NPSG involved all potential site developers to make a short presentation to the Group. In response 15 site promoters choose to accept the invitation and presentations took place on 21 and 31 July 2017.
- 4.22. Presentations were given from the following site promoters:
- Land at Wellcross Grange, Farm Cottage and Wellcross Lodge, near Broadbridge H.
 - Land at, Sharpenhurst Farm, Itchingfield.
 - Land at Muntham Home Farm, Barns Green.
 - Land near Ark cottage, Plumtree Cross Lane, Barns Green.
 - Land rear of Hele Farm, Sandhills Road, Barns Green.
 - Land fronting Sandhills Road, Barns Green.
 - Land at Hele Farm, Sandhills Road, Barns Green.

- Land at “Warrenhurst” Plumtree Cross Lane, Barns Green.
- Land at “Ropers” and “Cheffins” fields, Barns Green.
- Land at Muntham Drive, Barns Green.
- Land at Sumners Ponds, Chapel Road, Barns Green.
- Land at the rear of Cross Lane, Barns Green.
- Land at “The Glades”, Trout Lane, Barns Green.
- Land at Richmond House, Rye Farm Lane, Barns Green.
- Land at Chapel Road, Barns Green.

4.23. The following developers/agents gave written presentations:

- Land west of Christ’s Hospital Station.
- Land East of Five Oaks Road, Itchingfield.
- Land at “Wheatcroft”, Bashurst Hill (2 plots).
- Land at “Wheatcroft”, Bashurst Hill (2 plots).
- Land at the Old School, Itchingfield and attached former playing fields.

4.24. A further site, single dwelling in Bashurst Hill, Itchingfield, was put forward.

4.25. Details relating to the Presentations are available to view in Appendix 6.

Landscape Character Assessment: October 2017

4.26. IPC commissioned a Landscape Character Assessment to inform the preparation of the INP.

4.27. The Report identified and described landscape character areas within the Parish and their key characteristics to provide the baseline to guide future development and management of the landscape.

4.28. Details relating to the Landscape Character Assessment is available to view in Appendix 7.

Topic Paper: Nature Conservation and Biodiversity: October 2017

4.29. IPC commissioned a Topic Paper on nature conservation and biodiversity to inform the preparation of the INP.

4.30. The Paper summarises available evidence on the natural assets which exist within the parish; identifies key natural assets; includes suggestions for environmental policies.

4.31. Details relating to the Topic Paper is available to view in Appendix 8.

Scoping Report: January 2018

- 4.32. The Scoping Report for the Sustainability Appraisal (SA) to accompany the INP was the subject of formal consultation with the statutory bodies January 2018.
- 4.33. Feedback was received from Natural England and the Environment Agency in accordance with the regulatory timetable. No response was received from Historic England.
- 4.34. Details relating to the Scoping Report are available to view in Appendix 9.

Public Exhibition of Sites: January 2018

- 4.35. A Public Exhibition of Sites was held on 20 January 2018 between 10am-4pm.
- 4.36. The event was held at Barns Green School.
- 4.37. Details relating to the following sites were exhibited:
- Land at Wellcross Grange, Farm Cottage and Wellcross Lodge, near Broadbridge H.
 - Land west of Christ's Hospital Station.
 - Land East of Five Oaks Road, Itchingfield.
 - Land at "Wheatcroft", Bashurst Hill (2 plots).
 - Land at "Wardcot", Fulfords Hill, Itchingfield.
 - Land at "Bailings", Fulfords Hill, Itchingfield.
 - Land at "Church Farm:", Fulfords Hill, Itchingfield.
 - Land at the Old School, Itchingfield and attached former playing fields.
 - Land at Plumtree Cross, Itchingfield.
 - Land at, Sharpenhurst Farm, Itchingfield.
 - Land at Muntham Home Farm, Barns Green.
 - Land near Ark cottage, Plumtree Cross Lane, Barns Green.
 - Land rear of Hele Farm, Sandhills Road, Barns Green.
 - Land fronting Sandhills Road, Barns Green.
 - Land at Hele Farm, Sandhills Road, Barns Green.
 - Land at "Warrenhurst" Plumtree Cross Lane, Barns Green.
 - Land at "Ropers" and "Cheffins" fields, Barns Green.
 - Land behind "Sunnycroft", Two Mile Ash Road, Barns Green.

- Land at Muntham Drive, Barns Green.
- Land at Sumners Ponds, Chapel Road, Barns Green.
- Land at Batchelors Farm, Emms Lane, Barns Green.
- Land at the rear of Cross Lane, Barns Green.
- Land at “The Glades”, Trout Lane, Barns Green.
- Land at Two Mile Ash Road, Barns Green.
- Land at Richmond Farm, Two Mile Ash Road (3 plots).
- Land at Richmond House, Rye Farm Lane, Barns Green.
- Land adjacent to Rye Farm House, Rye Farm Lane, Barns Green.
- Land at Chapel Road, Barns Green.
- Land at Bashurst Hill, Itchingfield.

4.38. Residents were invited to provide feedback on each of the sites.

4.39. The exhibition was well attended with 250 people in attendance.

4.40. Details relating to the Public Exhibition is available to view in Appendix 10.

Public Consultation Meeting and Exhibition of Possible Sites: June 2018

4.41. A further Exhibition of Sites was held on 18 June 2018 at 19.30 in the Village Hall, Barns Green.

4.42. Details relating to the following sites were exhibited:

- Land at Wellcross Grange, Farm Cottage and Wellcross Lodge, near Broadbridge H.
- Land west of Christ’s Hospital Station.
- Land East of Five Oaks Road, Itchingfield.
- Land at “Wheatcroft”, Bashurst Hill (2 plots).
- Land at “Wardcot”, Fulfords Hill, Itchingfield.
- Land at “Bailings”, Fulfords Hill, Itchingfield.
- Land at “Church Farm”, Fulfords Hill, Itchingfield.
- Land at the Old School, Itchingfield and attached former playing fields.
- Land at Plumtree Cross, Itchingfield.
- Land at, Sharpenhurst Farm, Itchingfield.

- Land at Muntham Home Farm, Barns Green.
- Land near Ark cottage, Plumtree Cross Lane, Barns Green.
- Land rear of Hele Farm, Sandhills Road, Barns Green.
- Land fronting Sandhills Road, Barns Green.
- Land at Hele Farm, Sandhills Road, Barns Green.
- Land at “Warrenhurst” Plumtree Cross Lane, Barns Green.
- Land at “Ropers” and “Cheffins” fields, Barns Green.
- Land behind “Sunnycroft”, Two Mile Ash Road, Barns Green.
- Land at Muntham Drive, Barns Green.
- Land at Sumners Ponds, Chapel Road, Barns Green.
- Land at Batchelors Farm, Emms Lane, Barns Green.
- Land at the rear of Cross Lane, Barns Green.
- Land at “The Glades”, Trout Lane, Barns Green.
- Land at Two Mile Ash Road, Barns Green.
- Land at Richmond Farm, Two Mile Ash Road (3 plots).
- Land at Richmond House, Rye Farm Lane, Barns Green.
- Land adjacent to Rye Farm House, Rye Farm Lane, Barns Green.
- Land at Chapel Road, Barns Green.
- Land at Bashurst Hill, Itchingfield.

4.43. Attendees were informed of the Parish Council’s preferred sites and feedback invited.

4.44. The event was well attended with 120 people in attendance.

4.45. A Public Consultation Meeting was held on 19 June 2018 at 19.30 in the Village Hall, Barns Green.

4.46. This meeting provided IPC an opportunity to let residents know, the NPSG had come to a decision regarding the assessment of sites. Stakeholders were informed it was considered Site 7: Land at the Old School, Itchingfield and attached former playing fields; and Site 19: Land at Sumners Ponds, Chapel Road, Barns Green were IPC’s preferred sites.

4.47. Details relating to the Public Meeting and Exhibition are available to view in Appendix 11.

Dedicated Webpage: September 2018

- 4.48. A dedicated webpage was created on IPC's website in September 2018 and documentation was uploaded.
- 4.49. This provided an online mechanism to keep stakeholders up-to-date on Plan preparation, public events, and raised awareness of the preparation of the INP.

Housing Needs Consideration Report: September 2018

- 4.50. A Housing Needs Consideration Report was initially prepared by DOWSETTMAYHEW Planning Partnership in December 2017. The document was subsequently updated to reflect changes to National Planning Policy Guidance, in April 2018 and September 2018.
- 4.51. The documents brought together a range of empirical data from a variety of sources in order to enable assessments and judgements about the level of housing that may need to be delivered in the Parish, up to the period 2031.

Indicative Housing Requirement: October 2018

- 4.52. In light of changes to national planning policy an indicative housing requirement was requested and provided by HDC in October 2018.
- 4.53. Details of the report are available to view at Appendix 12.

Policy Group: October 2018

- 4.54. In response to a request for volunteers in October 2018 to form a Policy Group, 10 volunteers were appointed.
- 4.55. The focus of the Group was formulate planning policy in respect of key matters.
- 4.56. Meetings were held in December 2018 and January 2019 to progress the draft planning policies and aims of the INP.
- 4.57. The Policy Group presented the final draft version of the INP to the NPSG in June 2019.
- 4.58. Details of the report are available to view at Appendix 13.

Meeting with HDC: May 2019

- 4.59. A meeting was held on 13 May 2019 with Members of the NPSG and HDC Officers.
- 4.60. The meeting provided an opportunity to provide an update on plan preparation and timescales for public consultation.
- 4.61. Details relating to the meeting is available to view in Appendix 14.

Village Meeting July 2019

- 4.62. The Annual Village Meeting was held on the 29 July 2019.
- 4.63. The meeting provided an opportunity to provide an update on the preparation of the draft INP.
- 4.64. Details relating to the meeting is available to view in Appendix 15.

Cornerstone Barristers: August 2019

- 4.65. The draft INP was shared with Cornerstone Barristers in July 2019 for comments.
- 4.66. Details comments were provided in August 2019.
- 4.67. Details relating to Cornerstone Barristers comments are available to view in Appendix 16.

Informal Health Check Comments: October 2019

- 4.68. The draft INP was prepared by Members of the NPWG over a number of months. The accompanying draft Sustainability Appraisal (SA) was prepared by DOWSETTMAYHEW Planning Partnership.
- 4.69. The draft INP was submitted to HDC in October 2019 for an informal 'health check'. In response and in order to expedite matters, HDC agreed to let IPC know of any key issues ahead of consultation. It was agreed comments on the INP and the SA would be made via the Regulation 14 Pre-submission consultation.
- 4.70. HDC's comments were provided in October 2019 and considered by the NPSG . The INP was amended as appropriate.
- 4.71. Details relating to HDC's comments are available to view in Appendix 17.

5. MAIN ISSUES ARISING FROM ENGAGEMENT

- 5.1. The extensive stakeholder engagement helped inform the key issues addressed in the initial INP and the policies that flow from the Vision and Objectives.
- 5.2. The main issues that arose during the stakeholder engagement exercise, in the lead up to the preparation of the initial Pre-submission INP and its subsequent statutory consultation, can be summarised as:

- **Preserve the rural character of the parish.**
- **Prevent coalescence between settlements.**
- **Meet the housing needs of the parish.**
- **Ensure local residents have access to key local and community services.**
- **Retain and support local businesses.**

- 5.3. How these issues were addressed within the initial Pre-submission INP is set out below.

Preserve The Rural Character Of The Parish

- 5.4. The Parish is predominantly rural. It lies between between Horsham and Billingshurst and includes the settlements of Itchingfield and Barns Green. The latter is the main settlement in the Parish.
- 5.5. The Parish is identified as “medium village” in the Horsham District Planning Framework. The settlement hierarchy identifies Barns Green as having a moderate level of service and facilities and community networks, together with some access to public transport. It notes that Barns Green provide some day to day needs for residents, but relies on small markets towns and larger settlements for a number of their requirements.
- 5.6. The parish supports a wide variety of plant and animal life and habitats, including arable, woodland, hedgerows, grassland, ponds, as well as rivers and associated environments. Buildings within the parish are also capable of providing a habitat to a wide variety of wildlife, including but not limited to bats and owls.
- 5.7. There are a number of ancient woodlands in the Parish these include (but are not limited to) Shellys Wood and Hunters Wood to the east of Itchingfield on the eastern boundary of the Parish and Vale Wood in the south of the Parish. The Parish also benefits from undesignated mixed deciduous woodland which is considered “lowland mixed deciduous woodland”.
- 5.8. Public consultation events have highlighted a local desire to protect the valued rural nature of the parish
- 5.9. In light of feedback received, the following Strategic Objective is included in the INP:

“To protect our rural location and environment and to maintain the gaps between the parish and other parishes which surround it”

- 5.10. Furthermore, the INP includes: Policy 1: Green Infrastructure Conservation; Policy 2: Biodiversity Conservation; Policy 3: Heritage Assets and Itchingfield Conservation Area ; Policy 4: Protection of Open Spaces; Policy 5: Protection of Green Infrastructure; Policy 9: Sumners Pond Site ; Policy 10: Old School Site, Itchingfield; Policy X: Windfall Development; Policy 11: Design Parameters; and Aim 1: Prevention of Coalescence.

Prevent Coalescence Between Settlements

- 5.11. The historic market town of Horsham is circa 4 miles to the north east of the Parish. The Parish is bounded by Broadbridge Heath Parish Council to the north east, Southwater Parish Council to the east, Shipley to the south east, Billingshurst Parish Council to the south and south west and Slinfold Parish Council to the north west. The surrounding land is primarily agricultural and entry into the Parish is by way of green corridors bounded by fields and/or woodland.
- 5.12. Public consultation events highlighted the desire to protect areas of open land between the settlements or in order protect the feeling of leaving one settlement before entering into the neighbouring parishes. In addition, feedback highlighted that it valued the rural character and sense of openness between the settlements.
- 5.13. This feedback was taken into account when drafting the Strategic Objectives. The following Strategic Objective is included in the INP:

“To protect our rural location and environment and to maintain the gaps between the parish and other parishes which surround it

- 5.14. Furthermore, the INP includes: Aim 1: Prevention of Coalescence.

Meet The Housing Needs Of The Parish

- 5.15. As set out above, the Parish is predominantly rural. It lies between between Horsham and Billingshurst and includes the settlements of Itchingfield and Barns Green.
- 5.16. The Parish is identified as “medium village” in the Horsham District Planning Framework.
- 5.17. The census data from 2011 shows that the total population for the parish was 1565. This was a rise of 88 people from 2001 (5.95%). At the time of the census, there were a total of 555 households (at least 1 person occupying at the time of the census).
- 5.18. As an intrinsic part of the preparation of the INP a detailed assessment was undertaken of housing need. A Parish Housing Need Assessment was first prepared in December 2017. The Report was subsequently updated to take account of changes to National Planning Policy Guidance a, in April 2018 and September 2018.
- 5.19. The Government published the first revision of the NPPF on the 24 July 2018. It was subsequently updated and published in February 2019. With respect to to calculating housing need, paragraph 65, confirms strategic policy-making authorities should establish a housing

requirement figure for their whole area. Within this overall requirement, the NPPF confirms strategic policies should also set out a housing requirement for designated neighbourhood areas.

- 5.20. Paragraph 66 of the NPPF states: “Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”
- 5.21. In light of this an “indicative figure” was requested from HDC. An indicative housing requirement number was provided for Itchingfield in October 2018.
- 5.22. HDC confirmed the starting point for the calculation of an indicative housing number are the policies contained in the adopted Horsham District Planning Framework (HDPF).
- 5.23. The Report confirms in order to come to an indicative number for Itchingfield Parish the key data sources (Local Plan; SHMA; and housing needs register) were identified. HDC confirmed these when taken together inform key trends. Furthermore HDC confirmed no data source was given more weight than the other.
- 5.24. The indicative number was derived from a mid-point of the following three data sources:
- Local Plan derived figure - 19 dwellings;
 - SHMA derived figure - 83 dwellings; and
 - Housing Needs Register derived figure - 103 dwellings.
- 5.25. The Report sets out that the Council is of the view that it is a reasonable assumption to take the mid-point between the data sources as an appropriate method to reach an overall indicative housing number. For Itchingfield Parish the mid-point of the data sources is 61 dwellings.
- 5.26. HDC advised the indicative housing number does not take into account local constraints nor infrastructure capacity. In addition, HDC advised, it will be for the plan makers to undertake best endeavours to accommodate the number applying reasonable assumptions consistent with the principles of sustainable development to deliver the number in its entirety.
- 5.27. The Report confirms these figures may need to be revised in the light of additional evidence becoming available. Furthermore it is confirmed, the figures are only reflective of those set out in the current HDPF, and the housing need for the parish may need to be revised in due course to reflect updated needs which may emerge through the Local Plan process.
- 5.28. The INP was subsequently prepared on this basis. The INP seeks to facilitate the delivery of 61 dwellings through the proposed allocations and windfall development.
- 5.29. In parallel to considerations of housing need, IPC assessed the potential of a number of candidate housing sites to meet this need. This process commenced with a ‘Call for Sites’ in November 2016.

- 5.30. Following this, the NPSG undertook site appraisals of each of the sites and considered the environmental and policy constraints of each site.
- 5.31. Public Exhibitions were held to exhibit all sites received and to gain feedback from stakeholders. Public consultation events highlighted stakeholders views with respect to housing. Feedback identified that a number of stakeholders consider the INP should not include large housing estates and housing should be of an appropriate nature and scale.
- 5.32. This feedback was taken into account when drafting the Strategic Objectives. The following Strategic Objective is included in the INP:

“To provide adequate and appropriate housing for the future needs of the parish.

To ensure that any development is appropriate to the character and population of the parish.”

- 5.33. Furthermore, the INP includes Policy 9: Sumners Pond Site ; Policy 10: Old School Site, Itchingfield; Policy X: Windfall Development; Policy 11: Design Parameters; Policy 12: Sustainable Design; Policy 13: Housing Mix; and Aim 4: Housing Mix-Apartments.

Ensure Local Residents Have Access To Key Local And Community Services.

- 5.34. Whilst the Parish is rural, it nonetheless benefits from a range of material assets. These include the Village Green, Village Hall/Barns Green Sports and Social Club, Barns Green Primary School, Muntham House School, St Nicolas Church, Sumners Fishery and Campsite, Barns Green Store, and Public House. A Farm Shop lies to the north of the village in Itchingfield.
- 5.35. There are extensive footpath networks and Public Rights of Way (PRoW) which run through the Parish. The Downs link crosses the northern part of the Parish from the western side at Five Oaks Road to Lower Barn on the eastern edge of the Parish boundary.
- 5.36. In addition to this, the Parish benefits from sports and leisure clubs and societies. These include Parent and Toddlers Group, Barns Green Players, Local Vocals, Barns Green and Itchingfield Women’s Institute, Barns Green Youth Club, Barns Green Sports and Social Club, Rainbows Brownies, Scout Group, Barns Green Cricket Club, Short Mat Bowls, Barns Green Rugby Club, Tennis Club, Football Club, Barns Green Stoolball Club, Bell Ringing, Playgroup,
- 5.37. Public feedback has highlighted community infrastructure is critical to the well being of Parish residents. It has also confirmed residents value local community services and facilities and wish these to be protected.
- 5.38. This feedback was taken into account when drafting the Strategic Objectives. The Following Strategic Objective is included in the INP:

“ To Improve And Enhance The Infrastructure Of The Parish.

To Continue To Support The Facilities For The Social Life Of The Parish.

- 5.39. Furthermore, the INP includes: Policy 4: Protection of Open Spaces ;Policy 6: Community Facilities Protection; Policy 7: Education Facilities Development; and Policy 8: Broadband Provision.

Retain And Support Local Businesses

- 5.40. The 2011 Census reveals that the number of residents of working age (16-74) was 1104. Of this figure, 813 (73.6%) were economically active, and 291 (26.3%) were economically inactive.
- 5.41. The Parish is predominantly rural with a limited number of working farms. There are also a number of equestrian based enterprises. There are a number of businesses operating in the Parish. These include a Public House, Village Store and Post Office, Sumners Ponds Fishery and Campsite and Cafe which lie in and around Barns Green.
- 5.42. The largest employer in the Parish is Muntham House School, which is located north west of Barns Green, which is a charitable trust providing educational facilities for boys. Elsewhere, economically active residents commute out of the Parish or work from home.
- 5.43. Public feedback has highlighted a desire to protect the existing businesses within the parish and to support rural economic development. This feedback was taken into account when drafting the Strategic Objectives. The following Strategic Objective is included in the INP:
- “To continue the commercial activities within the parish, for the benefit of ourselves and surrounding communities.”*
- 5.44. Furthermore, the INP includes: Policy 8: Broadband Provision; Policy 9: Sumners Pond Site; and Policy 16 -Small-scale Business.

6. PRE-SUBMISSION INP & SA: 1ST NOVEMBER - 13TH DECEMBER 2019

- 6.1. As set out above, a draft INP and draft SA was submitted to HDC in October 2019 for an informal 'health check'.
- 6.2. The consultation documents were available to view online on the dedicated INP webpage. A hard copy of the consultation documents were available to view at: the Barns Green Village Store; the school office, Barns Green Primary School; and The Hordens, Barns Green.
- 6.3. Notice of the consultation was posted on the Parish Council website, on social media, on Parish Council noticeboards. A notice was placed in the 'BigMag'. The consultation was also advertised on banners which were displayed in the Parish.
- 6.4. Stakeholders were alerted to the consultation via email. Locally in the Parish, notices alerting residents and stakeholders to the consultation were placed on Parish notice boards. In addition, a notice was placed on the IPC website.
- 6.5. Details of the Pre-submission consultation are available to view in Appendix 18.

7. MAIN ISSUES ARISING THROUGH CONSULTATION ON THE PRE-SUBMISSION NEIGHBOURHOOD PLAN (REGULATION 14)

- 7.1. A total of 30 representations were received in response to the Regulation 14 Pre-submission consultation.
- 7.2. Representations were received from a variety of stakeholders. These can be summarised as follows:

- **Developers/Landowners/Agents: 7;**
- **Statutory Bodies: 5; and**
- **Residents: 18.**

- 7.3. The main issues which have arisen through Consultation are:

- **Appropriateness of identified housing need;**
- **Promotion of additional housing site(s); and**
- **Appropriateness of Traveller Policy.**

Appropriateness Of Identified Housing Need

- 7.4. A total of 4 representations were received in respect of housing need. Representations were received from

- Horsham District Council (HDC);
- White & Sons;
- Turley; and
- ECE Hunter Developments.

- 7.5. **Horsham District Council:** Representations note the INP promotes two sites which will facilitate the delivery of 52 dwellings over the plan period with the remaining shortfall of 9 dwellings to come from windfall allowance for the parish. Representations confirm this approach is aligned with national guidance.
- 7.6. Representations submit a policy for a windfall allowance of 9 dwellings, to come forward in the Plan period, would be appropriate to meet the indicative housing requirements. It is submitted care must be taken to avoid the issue of double counting for the purposes of monitoring in relation to recording the wider windfall allowance for the district.
- 7.7. **White & Sons:** Representations state the INP should be based on the SHMA and Housing Needs Register derived figures. It is submitted the Local Plan derived figure is considered to be out of date and to underestimate the actual level of need and should therefore be set aside.
- 7.8. Representations request an updated 'indicative figure' is requested from HDC to reflect the current position as housing needs in the District are understood to have increased. Representations recommend the removal of the out of date Local Plan derived figure or otherwise include an explanation for the significant deviation between the derived figures and the effect of this on the housing need.
- 7.9. Representations request Local Plan derived figure should be set aside with the mid point recalculated. Representations submit a mid point of 93 is considered to be more appropriate and reflective of the actual need in the Parish.
- 7.10. **Turley:**Representations submit the 'Housing Needs Indicative Requirement October 2018' is silent on the issue of older person's accommodation. It states the report extrapolates affordable housing need to conclude an indicative housing number of 61 dwellings for Itchingfield Parish, based on the mid-point of the HDPF Local Plan derived figure (19 dwellings), SHMA derived figure (83 dwellings) and Housing Needs Register derived figure (103 dwellings). It is submitted given the age of these documents, it is considered that the evidence base relied upon is out of date.
- 7.11. Representation set out that figures referenced in the report are only reflective of those set out in the current HDPF 2015.
- 7.12. Representations state that the report acknowledges that the housing need for the parish may need to be revised in due course to reflect updated needs which may emerge through the local plan process.
- 7.13. **ECE Hunter Developments:** Representations submit that the most recent evidence published by HDC in respect of housing need is dated 2016, which representations state pre-dates the updated

National Planning Policy Framework (NPPF) and standard methodology for housing supply and delivery.

- 7.14. Representations submit under the provision of the updated NPPF, INP Steering Group requested an indicative housing requirement for the Parish. Representations confirm HDC has provided a housing requirement for the parish of 61 dwellings.
- 7.15. Representations submit that the proposed 'indicative figure' of 61 units should be seen as a minimum, with allocations seeking to make the most effective use of land to deliver housing numbers more directly linked with both the SHMA and HNR figures.
- 7.16. In response to comments received a background paper entitled 'Response to Regulation 14 Pre-submission Representations in Respect of Housing Matters, March 2020'. This provides a detailed response to matters raised by all parties and confirms any recommended changes to the Submission INP.
- 7.17. Details relating to the background paper 'Response to Regulation 14 Pre-submission Representations in Respect of Housing Matters, April 2020' are available to view in Appendix 19.

Promotion Of Additional Housing Site(S)

- 7.18. A total of 5 representations were received from developers/agents acting on behalf of landowners in respect of the promotion of housing sites.
- 7.19. Representations were received from:
- Christ's Hospital;
 - Hume Planning Consultancy;
 - Miller Developments;
 - Turley; and
 - White & Sons.
- 7.20. **Christ's Hospital:** Representations state it is considered that housing-led development in the vicinity of Christ's Hospital Station would not only be appropriate over the life of the Plan, but would also potentially be capable of delivering further new and upgraded parking facilities in connection with the station. It was submitted more detailed consideration of both sites 2a and 2b could be undertaken that would lead to their identification as the sites being available, suitable and developable during the life of the Neighbourhood Plan.
- 7.21. **Hume Planning Consultancy:** Representations submitted the capacity of land to the rear of Sunnycroft, Two Mile Ash Road falls below the required threshold of inclusion within the SHELAA, however it is considered this should not prevent the Neighbourhood Plan from considering the site for residential development. Representations advise the site should be allocated for residential development.

- 7.22. **Miller Developments:** Representations set out objection to the INP due to the reasons given for the dismissal of Site 28 in the Site Assessments document and the proposed allocation of the Sumners Pond and Old School sites for housing. Representations submit Site 28 is situated immediately adjacent to the existing boundary of the Built-Up Area in Barns Green and the site is an appropriate location for a long-term expansion of the village.
- 7.23. **Turley:** Representations set out comments in respect of the assessment of Site 1 and the site criterion used to reach conclusions.
- 7.24. In response to comments received a background paper entitled 'Response to Regulation 14 Pre-submission Representations in Relation to Matters Relating to the Selection of Sites for Development'.
- 7.25. This confirms IPC's Approach to site selection including: the 'Call for Sites'; Public Exhibitions; Site Appraisals; NPWG meetings' IPC meetings and associated decisions on preferred sites. In addition it provides a detailed response to matters raised by all parties in respect of site selection.
- 7.26. Details relating to the background paper 'Response to Regulation 14 Pre-submission Representations in Relation to Matters Relating to the Selection of Sites for Development' are available to view in Appendix 20.

Appropriateness Of Traveller Policy.

- 7.27. HDC provided comments on the proposed Traveller policy. Representations submitted the policy does not meet some of the 'basic conditions' set out in paragraph 8(2) of Schedule 4B of the Town and Country planning Act 1990. It is considered when the Plan comes before an Inspector at Examination it is likely to be found 'unsound'. The relevant conditions are:
- "(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),*
- (f) the making of the order does not breach, and is otherwise compatible with, EU obligations"*
- 7.28. With regard to (e) the strategic allocation of Travellers pitches, it is submitted this has been considered by the Local Planning Authority supported by robust evidence base to demonstrate the provision of 5 years of deliverable sites and local need.
- 7.29. It is submitted such evidence complied in accordance with 2015 Planning Policy for Traveller Sites (PPTS) should be presented as part of the evidence base to support a robust policy in the plan.
- 7.30. Representations confirm support is given to those neighbourhood plans who seek to allocate suitable traveller sites within the plan in accordance with national guidance.
- 7.31. It is considered the provision of travellers pitches throughout the district should be evidence led and in the absence of robust supporting evidence the justification for the inclusion of the proposed policy in the Neighbourhood Plan would also be found to be incompatible with condition (f), as the government guidance is that there will be replacement obligations specific to the UK if Brexit goes ahead.

- 7.32. Additionally, it is submitted policies must comply with current UK Equalities legislation. The Equalities Act 2010 states that discrimination on grounds of race or ethnic origin is unlawful, and this will apply to the gypsy and traveller community.
- 7.33. It is submitted the proposed emerging policy removes the opportunity to consider provision for a particular community within the parish, and if challenged is unlikely to be found compliant, and so should be removed on that basis.
- 7.34. In response to comments received from HDC, a revised draft Traveller Aim and associated supporting text has been prepared by the NPSG. This has been discussed and agreed with HDC legal department.
- 7.35. The revised Aim and supporting text is set out in the Submission INP.

Other Matters

- 7.36. Table 1 summarises all responses received (including the above) and for completeness is set out below.

TABLE 1 STAKEHOLDER FEEDBACK

| AIMS/POLICIES | | |
|---------------|--------------------------------|---|
| Aim /Policy | Commenter No. | Summary of Comments |
| General | 8 (Environment Agency) | Representations state based on the environmental constraints within the Plan area, the Environment Agency have no detailed comments to make in relation to the Plan at this stage. |
| | 9 (HDC) | <p>Representations recommend reference to 'Proposals Map' is replaced with 'Policies Map' as this is the terminology used in planning legislation. The Policies Map shows allocations and designations arising from policies in the local plan or Neighbourhood plan and at the current time these are not sufficiently clear. The Policies Map should be a map which:</p> <ul style="list-style-type: none"> (i) identifies the location and boundaries of allocations and designations; (ii) is reproduced from, or based on, an Ordnance Survey map; (iii) shows National Grid lines and reference numbers; and (iv) includes an explanation of any symbol or notation which it uses. <p>Representations submit that it follows all policies relating to landuse should be delineated on the policies map – proposed local green spaces, proposed buffer zones, designated play spaces and any proposed cycling or pedestrian links.</p> <p>Representations submit an objective that explicitly refers to the conservation of the historic environment with reference to new development would strengthen the plan.</p> <p>Representations set out support to retain existing leisure and recreational opportunities and to maintain and enhance community facilities; however there was no detail as to how this would be achieved.</p> <p>Representations recommend checking chapter listing – there are two 'chapter 4s'.</p> <p>Representations confirm HDC has sought confirmation from local groups to commit to a full or partial review of Neighbourhood Plan once the District has completed a review of its Local Plan in 2021.</p> <p>Representations state a statement in the plan to provide this clarity would be appropriate.</p> |
| | 10 (Natural England) | Representations state Natural England does not have any specific comments on this draft neighbourhood plan. |
| | 11 (Sport England) | <p>Representations set out that it is essential that neighbourhood plans reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Para 96 and 97.</p> <p>It is submitted that it is important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land.</p> <p>In line with the Government's NPPF and Planning Practice Guidance representations submit consideration should also be given to how any new development, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this.</p> |
| | 12 (WSCC Services Response) | <p>Representations set out that whilst WSCC welcoming the decisions of so many parishes to prepare Neighbourhood Plans, the County Council does not have sufficient resources available to respond in detail to Neighbourhood Plan consultations unless there are potentially significant impacts on its services that we are not already aware of, or conflicts are identified with its emerging or adopted policies. Representations state WSCC expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals.</p> <p>Representations set out West Sussex Waste Local Plan 2014 (WLP) and the West Sussex Joint Minerals Local Plan 2018 (JMPLP) form part of the development plan for Itchingfield as well as the Horsham District Planning Framework; as such the Waste and Minerals Plans should be mentioned alongside the Local Plan for Horsham.</p> <p>Representations set out the entire area of the Parish is safeguarded under Policy M9 of the Joint Minerals Local Plan and part of the Parish is safeguarded under Policy W2 of the Waste Local Plan. The Parish may wish to consider if they want to include reference to this in their Plan.</p> |
| | 6 | <p>Objectives</p> <p>Representations set out support for the recognition within the draft Neighbourhood Plan of the requirement to provide adequate and appropriate housing for the future needs of the parish. However, it is considered that this objective should go further and explicitly reference the critical local need to provide accommodation for the ageing population, as referenced in Chapter Two.</p> |

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| 13 | <p>Representations state they are disappointed the Steering Group decided not to have their meetings in public like the full council.</p> <p>Representations submit in order to obtain a greater engagement, a summary of the key factors written in a more simplistic way should have been prepared on 1 or 2 pages of A4 paper.</p> <p>Representations recommend when the plan is agreed and shortly before any construction commences a liaison committee should be formed comprising of the developer, parish council and residents who are going to be inconvenienced.</p> <p>Representations submit on Page 11 Section 1.6.6 states that a summary of all representations will be made public. It is submitted You the full details of every response should be made public and not summarised or edited, as the council or the examiner should see the full details, so there can be no ambiguity.</p> <p>Representations submit on Page 10 Section 1.5.4. It says the exhibition was held in January 2017. I believe this to be incorrect as it was held on Saturday 20th January 2018.</p> <p>Representations submit on it is frequently mentioned in the minutes of the Steering Group that the site assessment forms would be published. It is submitted this never happened and the first time residents were able to access this information was when the draft plan was published on 1st November 2019.</p> <p>Representations submit they wish to record yet again that they live opposite Summers Ponds (Site 19) and whilst they will be impacted by the site during and after construction through parking and other issues, they have no objections to some development in the field opposite North Cottage. This would be subject to some assurances. In addition representations submit they have no objections to the proposed commercial development. However there are objections to the overall scheme that is being proposed.</p> |
| 14 | <p>Representations set out serious concerns regarding the competent and impartiality of the plan's authors and the evidence basis used within its development.</p> |
| 16 | <p>Representations submit the INP should state the % of residents who are in support of what is proposed.</p> <p>It is submitted the INP does not reflect the fact that the % of residents in the Itchingfield Hamlet is very small in comparison to the rest of the parish.</p> <p>Representations submit there is no mention of Bashurst Hill.</p> <p>Representations submit the "Itchingfield High Street" photo should read Itchingfield Road.</p> |
| 18 | <p>Representation submit consideration should be given to a summary of the key points of the plan to be attached to any voting slip.</p> <p>Representations submit that the Framework covers 15 years from adoption, assuming this occurs in 2020 then Village Strategic planning is covered until 2035, not 2031 as stated in the forward and clause 12.1.0.</p> <p>Representations submit that Section 2.5 should be "Barns Green and Itchingfield today."</p> <p>Representations submit that 2.5.2 - Bashurst Hill should be incorporated within Itchingfield not identified as separate.</p> <p>Representations state with respect to Flood Risk Zones - Need to understand what Flood Zones 1/2/3 mean and what a Category 2 settlement. Without this understanding no valid comment can be made.</p> <p>Representations oppose Greenfield development within the Parish.</p> <p>Representations query how binding policy wording is? Representations submit Policies need to clearly state: Must, Should, Can or May.</p> <p>Representations query how views be considered to be without evidence?</p> |
| 20 | <p>Representations submit the plan has clearly identified the 'least worst' options available to provide a solution for almost all of the 61 housing plots that have to be found.</p> |
| 21 | <p>Representations submit the plan has clearly identified the 'least worst' options available to provide a solution for almost all of the 61 housing plots that have to be found.</p> |
| 26 | <p>Representations set out agreement with the Draft proposals, sites, considerations and potential.</p> <p>Representations state one issue they would like to enrich, is contained in the background info and state this does not materially affect the Plan.</p> <p>Representations submit there is a wealth of Inventory, Manors/Rapes and built environment references available and documentation is shared with the PC.</p> <p>Separately, representations comment on the early process of this consultation.</p> <p>It is submitted that is appeared that HDC would only be looking at sites of 10+ units, and so the presenter submitted a proposal which described 5 scenarios for our site, all reflecting each of the criteria.</p> <p>Representations ask the PC to consider the language that is used when asking Parishioners to use their time, to perhaps plan the questions they may ask, and most of all, to refrain from making assumptions and judgements based on personal experience rather than evidence and fact.</p> |

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| | 27 | Support without modifications. |
| | 28 | <p>Representations set out agreement with aims to preserve ecology, biodiversity and to do everything we can to 'resist climate change'. Representations query who is going to ensure that these measures are adhered to and that these assets are really protected?</p> <p>Representations state an excellent traffic survey has been completed.</p> <p>Representations confirmed it would be good if the banked area in front of the court could be planted with a hedge or some trees which would soften the appearance and do something wonderful for the wildlife.</p> <p>Representations submit Barns Green is an expanding village in terms of population, but it doesn't have to expand in terms of development. Representations submit the two major sites where development has been approved are well chosen.</p> <p>Representations submit the surrounding villages are being swamped by building, light and car pollution at an alarming rate and that Barns Green does not have to take an intensive building project.</p> |
| CHAPTER 4 - ENVIRONMENT AND HERITAGE | | |
| General | 16 | <p>Representations submit Bashurst Hill reference is missing and recommend the following text is included:</p> <p>X% of residents live in the Itchingfield Hamlet</p> <p>X% of residents live in Bashurst Hill.</p> |
| Aim 1 - Prevention of Coalescence | 3 | <p>Representation submit further consideration should be given to the potential for appropriate development to be brought forward around Christ's Hospital railway station, including land to the west of the station.</p> <p>Representations submit the wording in respect of "perceived separation" is not considered appropriate and should be deleted. Consider the policy should refer to physical separation.</p> |
| Policy 1 - Green Infrastructure Conservation | 9 (HDC) | <p>Representations set out support to the policy especially the final section which references clear government guidance with regards to achieving a net gain in biodiversity.</p> <p>Representations 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. Representations query whether this part of the policy be inserted directly to Policies 8 & 9?</p> |
| | 16 | Representations submit the document does not explain how the developers would compensate for the loss of the green infrastructure or protect the existing ecosystem. Representation submit an additional section should be included to outline how examples of how this will be achieved with both proposed developments. |
| | 18 | Representations submit the INP should be a clearer or a more forceful statement about potential compensation provided. |
| Policy 2 - Biodiversity Conservation | 9 (HDC) | <p>Representation query whether Policy 2 would be applicable to all development including one infill proposal? Representation seek clarification on where the threshold of 5 dwellings originates from with regards to Policy 2 (f).</p> <p>Representations set out a suggestion to apply the criterion directly to allocations policies.</p> |
| Policy 3 - Heritage Assets and Itchingfield Conservation Area | 9 (HDC) | No further comment. |
| | 16 | Representations state the sentence which reads 'well-built, well designed, low density development would be welcomed.' should be deleted as it is supposition and is not supported by the residents of Itchingfield Hamlet. |
| | 18 | Representations query whether the sentence which reads 'well-built, well designed, low density development would be welcomed.' can be deleted. |

CHAPTER 5 - COMMUNITY INFRASTRUCTURE

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| <p>Policy 4 - Protection of Open Spaces</p> | <p>9 (HDC)</p> | <p>Representation ask if further protection is required or merited. For example, Ancient Woodland is protected under existing legislation and community assets such as playing fields are also protected through existing HDPF policy (4.3). Representations set out that it would be useful and necessary to delineate such assets on a policies map. Representation set out a suggested amendment as follows: 'Development proposals shall, where possible and consistent with other policies in this Plan, include measures which provide a mix of formal and informal open space to meet the needs generated by the development. Open space is to be of high quality and serve local need.'</p> |
| | <p>17</p> | <p>Representations submit the Plan should consider inclusion of protection of the woodland adjacent to the Jubilee Field and the Aboretum as this is likely to be ancient. Suggest the naming of these woodlands as priority areas for protection within Barns Green. Representations submit a statement is needed here to elucidate and elaborate upon the concept of 'social benefit' as there needs to be explicit recognition of the weighting needed to passive aspects of open green spaces as well as active. Representations submit a statement is needed to confirm the effect that proposals need to involve consultation with the residents of Barns Green and have an 'independent' analysis of the results. Representations submit a case could be made in line with the biodiversity conservation (5.6.3) section of the plan to re-designate the Jubilee Field as a locally relevant habitat site. Representations submit it should be recognised within this plan that the Jubilee Field meadow contributes to the iconic views of the village and should be preserved. Representations submit Policy 4 needs to be clearer in its terms of reference in relation to the definition of 'surplus to requirements' and those agents involved in these decisions. Representations submit the Neighbourhood Development Plan ought to be designed to project allocation of open spaces for a population that is expected to rise in the next fifteen years. The equitable allocation of natural spaces (e.g. Jubilee Field), formal spaces and sporting field per person is to be encouraged and needs to be more explicit in the policy.</p> |
| | <p>19</p> | <p>Representations set out concern to turn the jubilee field into a rugby pitch or multi-purpose sports field.</p> |
| <p>Policy 5 - Protection of Green Infrastructure</p> | <p>9 (HDC)</p> | <p>Representations set out that while hedgerows and individual trees do not need to be identified on a policies map but identification of local landmarks such as Asmiles Community Orchard and specific river corridors should be denoted on a policies map. Representations confirm this will provide clarification for all stakeholders (landowners, developers, local residents, officers) and avoid any potential disputes.</p> |
| <p>Policy 6 - Community Facilities Protection</p> | <p>6</p> | <p>Representations submit the application for the community care retirement community will incorporate on site community facilities. Therefore representation state Turely support the recognition within Policy 6 of the need to protect existing community facilities and consider the policy should also encourage schemes to deliver additional facilities where appropriate to do so.</p> |
| | <p>9 (HDC)</p> | <p>Representations submit reference to comments relating to Policy 4 regarding community infrastructure. Representation set out it is considered Policy 6 is similar to HDPF 4.9 so query whether the inclusion of Policy 6 bring added value to the emerging plan. It is considered such policy provision for a neighbourhood pan bring about a 'local' perspective and identified specific local community facilities which requires protection.</p> |
| <p>Policy 7 - Education Facilities Development</p> | <p>9 (HDC)</p> | <p>Representation recommend WSCC education authority is consulted and (potential) expansion is agreed with the education authority. Criterion (a) may not be possible but it is acknowledged in the policy itself. Representations recommend any land is safeguarded and denoted on a plan to ensure clarification.</p> |

CHAPTER 6 - HOUSING

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| <p>General</p> | <p>9 (HDC)</p> | <p>Representation confirm HDC have provided an indicative housing target of 61 dwellings in the Plan period. Comments note the INP is promoting 2 sites which will facilitate the delivery of 52 dwellings over the plan period with the remaining shortfall of 9 dwellings to come from windfall allowance for the parish. Representations confirm this approach is aligned with national guidance. Representations submit a policy for a windfall allowance of 9 dwellings to come forward in the Plan period would be appropriate to meet the indicative housing requirements. It is submitted care must be taken to avoid the issue of double counting for the purposes of monitoring in relation to recording the wider windfall allowance for the district.</p> |
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| 3 | <p>Representation submit it is considered that housing-led development in the vicinity of Christ's Hospital Station would not only be appropriate over the life of the Plan, but would also potentially be capable of delivering further new and upgraded parking facilities in connection with the station</p> <p>Considered more detailed consideration of both sites 2a and 2b could be undertaken that would lead to their identification as the sites being available, suitable and developable during the life of the Neighbourhood Plan.</p> |
| 4 | <p>Representations submit it is considered capacity of land to the rear of Sunnycroft, Two Mile Ash Road falls below the required threshold of inclusion within the SHELAA, however it is considered this should not prevent the Neighbourhood Plan from considering the site for residential development. Representations submit the site should be allocated for residential development.</p> |
| 5 | <p>Paras 6.3 through to 6.5, Policy 9 & Policy 10.</p> <p>Representations set out objection to the Plan due to the reasons given for the dismissal of Site 28 in the Site Assessments document, and the corresponding proposed allocation of the Summers Pond and Old School sites for new housing.</p> <p>Representations state it is considered that in coming to the conclusion that Site 28 is <i>unsuitable for development</i>, the main reason given in the Site Assessment is that the existing agricultural tenancy raises a significant question mark over the deliverability of this site, with the tenant 'having made it clear that he will resist any attempt to terminate the</p> <p>Representations also state that the Tenant is also the owner of Summers Pond site.</p> <p>Representation confirm that it has previously pointed out to the Parish Council in July 2018, that termination of this tenancy is not within the tenant's gift as the landlord is entitled to serve a notice terminating any existing tenancies if planning permission is granted for a use other than agricultural. Representations state this is a factual position, and therefore the site is available for development.</p> <p>With respect to the SHELAA, representations confirm the site was identified as 'deliverable housing site' in the 2009 SHLAA. Representations state the status of Site 28 was changed to 'Not Currently Deliverable' in 2015, although no reasons were given at the time as to why this change from 'deliverable' to 'not currently deliverable' had taken place.</p> <p>Representation consider the Plan should make provision for what should occur in a situation where one or both of the preferred housing sites fail to come forward within an acceptable timescale.</p> <p>Representations set out</p> <ul style="list-style-type: none"> • The site gently rises, rather than slopes, and is surrounded by a cordon of mature tree belts on all three sides. It is not considered housing on the site would be 'highly visible', particularly in the case of a sympathetically designed and well landscaped proposal. • The presence of listed buildings should not prevent a well-designed and sympathetic scheme coming forward. Consider there is no reason why an appropriate development would be harmful to the setting of the existing listed buildings. • Site 28 is relatively small, and any development would be sympathetic in scale & kind to the village. • Suitable & acceptable vehicular access would have to be demonstrated during the detailed planning process. <p>Representations note Policy 9 of the draft Neighbourhood Plan states that providing a safe vehicular access is also an issue for the Summers Pond site to overcome in due course. Representations state this has not hindered its allocation as a preferred housing site in the draft Plan.</p> <ul style="list-style-type: none"> • Site 28 is situated immediately adjacent to the existing boundary of the Built-Up Area in Barns Green. It is considered the site is an appropriate location for a long-term expansion of the village. • Should Site 28 be developed, the infrastructure would have to include a Sustainable Urban Drainage System which captures the surface water run-off in a storm event and releases it over a much longer period directly into the network, thus removing the current source of flooding. • Density not out-of-keeping with the village. Development of Site 28 would result in a density entirely in keeping with the character of the village. |
| 6 | <p>Representation confirm opposition to the Plan.</p> <p>Representation confirm they are the agent acting for their client's land at Wellcross Farm, east of Five Oaks Road where a planning application has been submitted for a proposed continuing care retirement community.</p> <p>Representations submit the Needs Assessment, produced by Contact Consulting, submitted alongside the current planning application quantifies that there is a current shortfall of 492 units of Extra Care across the District.</p> <p>Representations state there is a critical need for retirement communities to address the rapidly ageing population, which is only exacerbated with the supply of new housing in general at a national level consistently failing to keep pace with growth in the population. It is considered there is a significant disparity between the identified needs of older people and the adopted and emerging Development Plan context to provide for those needs.</p> <p>Itchingfield Parish Need</p> <p>Representations submit the 'Housing Needs Indicative Requirement October 2018' is silent on the issue of older person's accommodation. It sets out the report extrapolates affordable housing need to conclude an indicative housing number of 6.1 dwellings for Itchingfield Parish, based on the mid-point of the HDPF Local Plan derived figure (19 dwellings), SHMA derived figure (63 dwellings) and Housing Needs Register derived figure (103 dwellings). It is submitted given the age of these documents, it is considered that the evidence base relied upon is out of date.</p> <p>Representation set out that figures referenced in the report are only reflective of those set out in the current HDPF 2015. Further its is stated that the report acknowledges that the housing need for the parish may need to be revised in due course to reflect updated needs which may emerge through the local plan process.</p> |

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| 6 Ctd | <p>Representation set out comments on the site assessment of Site 1 and the site criterion used to reach conclusions. Comments are set out on the following criterion</p> <ul style="list-style-type: none"> The site is remote from the BUAB of Barns Green, although adjacent to the BUAB of Broadbridge Heath. It is a Greenfield site, currently used mainly for agricultural purposes. The river Arun flows through the northern end of the site, leaving the surrounding land prone to flooding. Part of the site is listed as Historic Parkland in West Sussex Heritage Environment Record. The development would be highly visible and destroy the rural aspect of the area. The proposed development would erode the green buffer between Broadbridge Heath and Itchingfield/Barns Green. The houses would be convenient for Christ's Hospital railway station and School, but far distant from shops, public transport and other village amenities. The housing development would constitute a detached outpost from the village centre. There would be significant road safety issues when vehicles exited the site, whether onto the A264 or onto Fulfords Hill, a narrow country road. There is potential for the development to adversely affect the biodiversity of the river Arun. The site is listed on the SHELAA and in the Economic Land Assessment as "Undevelopable". The size of the proposed development far exceeds the housing needs of the parish, identified by the Steering Group, under any of the available methodologies. The site will do nothing to improve or enhance the infrastructure of the parish. <p>Representation submit it is considered as currently drafted it restricts the application of Policy 18: Retirement Housing and Specialist Care (Horsham District Planning Framework). It is considered that by not including sufficient flexibility, the NP jeopardises the delivery of appropriate sites which can contribute to meeting some of the shortfall for elderly accommodation.</p> |
| 7 | <p>Paragraph: 6.2.6. Representation set out it is considered that the Neighbourhood Plan should be based on the SHMA and Housing Needs Register derived figures. The Local Plan derived figure is considered to be out of date and to underestimate the actual level of need and should therefore be set aside.</p> <p>Representation submit clients land Site 18 would contribute to the Parish's housing need and provide in the region of 30 mixed dwellings.</p> <p>Modification - Representations request an updated 'indicative figure' is requested from HDC to reflect the current position as housing needs in the District are understood to have increased. Representations recommend the removal of the out of date Local Plan derived figure or otherwise include an explanation for the significant deviation between the derived figures and the effect of this on the housing need.</p> <p>Paragraph: 6.2.7 Representation submit it is considered there is a significant deviation between the figures is considered to skew the accuracy of calculated mid point.</p> <p>Modification - Representations request Local Plan derived figure should be set aside with the mid point recalculated. A mid point of 93 is considered to be more appropriate and reflective of the actual need in the Parish.</p> |
| 13 | <p>Paragraph 6.3.5 Representation submit the 2 sites considered suitable for development do not meet the identified needs of HDC within their Strategic Housing Market Assessment and Housing Needs Register. It is submitted these figures are both higher than those identified in the Neighbourhood Plan with the current allocations amounting to only 52 units comprising 31 units and 20 units.</p> <p>Modification: Allocate further housing for the village as an additional 30 units to make a total of 82 would almost fully meet the identified needs in the SHMA (83 units) and go further towards meeting the Housing Needs Register figure (103 units).</p> <p>Paragraph: 6.5.8 Representation submit clients site would also lend itself to houses of quality design and construction with larger plots.</p> <p>Modification: Allocate further housing for the village.</p> <p>Representations state they are surprised Ropers and Cheffins Fields (Site 16) was not recommended for inclusion in the plan. Representations note whilst planning permission was refused under DC/15/0029 this was for 63 dwellings and the current proposal is for a much reduced number of 40.</p> <p>Representations state the 2018 SHELAA does confirm like the two recommended sites this one can also be considered if submitted under a NP. It adjoins the Built Up Area Boundary, and all the facilities of Barns Green are within walking distance. Representations note access from Sandhills Road could present a problem it can be overcome, and is no different from the access into Sumners Ponds. It is also stated that there is also potential access from The Ashmiles Estate. It is considered it would also bring balance to developments in the village.</p> <p>Representations submit it is considered the following sites would be a better mix for the village than the ones put forward:-</p> <ul style="list-style-type: none"> Site 7 amended to show a reduced number of dwellings on the Old School Site (not the field) circa 8 Site 16 as submitted number of dwellings 40 Site 19 amended to show a reduced number of dwellings subject to confirmation on certain matters 22 dwellings. |

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| | <p>16</p> <p>Representations recommend para 6.2.7 is updated to read "For Itchingfield Parish the mid-point of the data sources figures was identified as 61 dwellings." Representations recommend a link is provided in the document to the site assessments. Representations also recommend a summary of key findings as to why the other proposals were not acceptable and why the two proposed sites put forward were acceptable i.e. highlight the differences. Representations submit that para 6.3.7 is the Steering Committee's own opinion that this imposed development will 'enhance' the hamlet of Itchingfield. From our perspective (and others), we live adjacent to the proposed housing estate, it will massively impact our privacy and outlook. The increased environmental pollution due to the additional traffic, light and noise, will spoil the tranquil nature rich surroundings.</p> <p>18</p> <p>Representations submit paragraph 6.2.7 should state "Barns Green and Itchingfield." Representations query the order of event regarding the site selection process.</p> <p>19</p> <p>Representations state two sites identified for future housing make good sense and support is given for the decision to keep future housing developments within the existing village or hamlet boundaries and to resist any sort of sprawl.</p> <p>22</p> <p>Representations state Summers Ponds is the more suitable location for affordable housing not Itchingfield. Representations state the site of the Old School should be limited to a smaller development of larger houses which might attract families out of the Village moving from smaller affordable housing which could be released for younger couples and single occupants. Representations submit affordable housing needs to be in the centre of Barns Green close to amenities.</p> <p>23</p> <p>Representations set out opposition to the building of 32 houses on the Summers Pond Site. Representations state it is claimed the site is mainly Brown Field and it is not! Representations advise of concern to Little Slaughterford Representation advise of concern re close proximity to Ancient Woodland, being outside the Village boundary and the land being in a Bat feeding area. Representations state Chapel Road would not cope with anymore traffic.</p> |
| <p>Policy 9 - Summers Pond Site</p> | <p>1</p> <p>Support with modifications. Representations set out that the most recent evidence published by HDC in respect of housing need is dated 2016, which representations state pre-dates the updated National Planning Policy Framework (NPPF) and standard methodology for housing supply and delivery. Representations submit under the provision of the updated NPPF, Itchingfield Neighbourhood Plan Steering Group approached HDC to request an indicative housing requirement for the Parish. HDC has set out the housing requirement for the parish to be in the region of 61 dwellings. Representations state it is considered that the proposed 'indicative figure' of 61 units should be seen as a minimum, with allocations seeking to make the most effective use of land to deliver housing numbers more directly linked with both the SHMA and HNR figures. The site at Summers Ponds has been actively promoted for inclusion, on behalf of Hunter Group Ltd, for a mixed use development comprising approximately 32 dwellings and 2,500sqm of commercial land. Representations confirm the agent is very pleased to see Summers Ponds has been carried forward to deliver a mixed use development. The inclusion of this site to provide such uses is fully supported in principle. Representations encourage the Parish Council to recognise the need for further flexibility in order to respond to change, and therefore the numbers of dwellings (around 32) and commercial units (around 7) as set out within emerging policy should not be seen as an arbitrary ceiling to delivering a high quality new development for the benefit of the local community. Representations submit it is considered that it is likely that more effective use of the land could be made, which would be unduly controlled by the policy wording and definition of 'around'. Representations therefore set out hope that consideration could be given to amending the introductory wording of Policy 9 Summers Ponds Site as follows: "Development proposals for a minimum of 32 residential units and 7 light industrial/commercial units, on land at Summers Ponds shall include the following measures: [...]"</p> |

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| 4 | <p>Representations submit the Neighbourhood Plan must be aligned with the Horsham District Planning Framework (HDPPF). It is asserted that the allocation of Summers Pond does not reflect the aims and objectives of the HDPPF.</p> <p>Representations state the site should be protected for employment uses, which would encourage the expansion of the existing businesses and support new start-up businesses – which would accord with policies 7 and 9 of the HDPPF.</p> <p>Representations set out the NP should therefore focus on allocating non employment uses for housing close to the edge of Barns Green in place of this site.</p> <p>It is submitted Summers Pond site could be fully allocated for employment to support the SME businesses in this rural area.</p> <p>Representation set out the site is currently occupied for employment purposes and it has not been demonstrated that the site is no longer viable or needed for employment.</p> <p>It is submitted the site could provide for the expansion of the existing small businesses and could attract new start up businesses.</p> |
| 9 (HDC) | <p>Representations ask consideration is given to the impact of the proposal on the non-designated historic farmstead of Slaughterford farm (reference is made to the Old Farm House – records from WSCC Historical Records indicate the site was identified originally as a historic farmstead). Could the plan assist through the development of planning policy to preserve the survival of any original farm buildings or possibly enhance those features.</p> <p>Representations state given part of the site comprises of light industrial and existing agricultural uses there may be contamination in the ground as a result of years of activity; Please consider inclusion for a requirement for a contamination assessment to be undertaken as part of the policy criterion.</p> <p>Criterion 4. Remove 'where possible' and replace with wording such as 'justifiable' to ensure flexibility.</p> <p>Representations set out support for the provision of employment at Summers Pond. Representations submit there should be no net loss of employment floorspace on this site. In terms of commercial provision onsite, representations recommend consideration is given to the inclusion of a criterion in respect of the massing and size of potential commercial units onsite as it is considered large box units/sheds may not be appropriate in a rural setting.</p> |
| (WSCC Services Response) | <p>Representations submit it should be noted that parking should be in accordance with the latest WSCC Parking Standards adopted in August 2019.</p> |
| 13 | <p>Representations submit Section 6.3.7 states the site is largely a Brownfield Site. It is considered this is incorrect.</p> <p>Representations submit the proposed housing is to be on the field which is agricultural/Greenfield.</p> <p>Representations state 6 properties will be built very close to a Grade II listed property. Representations advise of concerns about what damage could be caused by the digging of underground work on the foundations, and provision for services.</p> <p>Representations state the field and general area is considered to be a bat sustenance area.</p> <p>Representations state it is considered 'this will just be the gateway to further development as owner and developer clearly have ambitions for greater development of the site'.</p> <p>Concerns raised in relation to density, mobile phone mast and parking arrangements.</p> |
| 14 | <p>Representations submit plan currently does not incorporate a robust methodology for assessing sites and incorporates a lack of impartiality. It is considered the site assessment documentation does not provide robust justification to support statements made.</p> <p>Representation state the justification for site 19 includes the following considerations:</p> <ul style="list-style-type: none"> - The Economic Land Report marks the site as Undevelopable (without giving reasons). - Development would not visually impact the rural nature of the village. - The development is away from the centre of the village. - The housing density is, on that location, acceptable. <p>Representations submit that statements appear to be highly opinionated and factually incorrect. Please demonstrate that the compilers and reviewers of the document are competent individuals.</p> |
| 15 | <p>Representations submit that parking for Summers needs addressing.</p> <p>It is submitted that the school is not large enough for a potential of 50 extra houses in the village.</p> <p>Representations query what is there to stop a spread of development across the whole of Summer Ponds?</p> <p>Representations state the field is very, very wet in winter.</p> <p>Representations submit the volume of houses is extreme and squashing them in is not in keeping with the village.</p> |

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| 18 | <p>Representations state it is still unclear after carefully reading the site assessments why this site has been chosen whilst others have been discounted where they are first within the northern "arc" of the village.</p> <p>Representations submit the site is not largely brownfield as stated. Representations query how does development of this site "retain existing employment opportunities."</p> <p>Representations submit that deeming the entire complex of Summers Ponds a "Large Commercial site" could imply that the entity it is not agricultural, greenfield or recreational but potentially available for subsequent development as a "commercial site."</p> <p>Representations submit there is a need to qualify within the assessment if Summers Ponds is a recreation business or the basis from which to initiate a substantial housing development site? Representations set out concern that development could lead to potential development of the entire site over a number of years.</p> <p>Representation set out concern that the development site is not being correctly characterised within the review and assessment process. No consideration of the potential flood risk to the development.</p> |
| 24 | <p>Representation set out concern re visibility on busy road.</p> <p>Representation set out opposition to the houses being built on the Summers site:</p> <ul style="list-style-type: none"> • The proposed plans are not in keeping to the listed building and will effect its setting; • The rural nature of the Summers site being developed into a housing estate; • Field proposed is a known bat feeding ground close to ancient woodland which is about 150m away; • Effect on the setting of the listed building; • Summers side of the road is outside the village boundary. <p>Representation set out objection to Page 44-45 - 6.3.7 as it is considered misleading.</p> |
| 25 | <p>Representation submit Paragraph 6.4.2, page 46 this section is currently an arable / grassland field and borders the boundary of the existing Listed building 'Little Slaughtford'.</p> <p>Representations submit building new houses up to the boundary fence of the listed building will destroy this special setting.</p> <p>Representations consider the removal of the Northern section of this site from the proposal making the Northern boundary the existing entrance / access road to Summers Ponds.</p> |
| 29 | <p>Representation set out support for the land development at Summers Pond. This land has previously been developed and as such is ideally located for future development without compromising the parish's green fields.</p> |
| 30 | <p>Representation set out support for the land development at Summers Pond. This land has previously been developed and as such is ideally located for future development without compromising the parish's green fields.</p> |
| 2 | <p>Representations confirm the Chichester Diocese strongly supports the proposals for the Old School site.</p> <p>Representations submit the proposed density is less than that shown on either of the indicative plans submitted at the Call for Sites stage. Representations confirm the reasons for the lower density are understood and the diocese does not object to any of the details of Policy 10.</p> <p>Representations confirm only comments at this stage are those of consistency between the text and the policy. The policy uses the term around 20 residential units and "around" is defined in 6.5.10 as plus or minus 10% of the figure quoted. Paragraph 6.5.3 (b) refers to "a maximum of 20 dwellings) and sub-paragraph (c) to "up to 20...".</p> <p>Representations confirm the Diocese strongly supports the sentiments expressed in 6.5.4 regarding the derelict condition of the site. Representations confirm the Diocese has kept to its informal undertaking not to seek to preempt the neighbourhood plan with an early planning application but unfortunately the result has been that there have been repeated instances of vandalism. Having regard to the security issues and the unsightliness of a derelict site, representations confirm the Diocese will be seeking to bring the site forward for development at the earliest possible period of the neighbourhood plan.</p> |
| 4 | <p>Representation submit the site is remote from the built up area boundary, shops and village amenities.</p> <p>It is considered the proposed allocation of the Old School represents a significant proportion of the overall housing target yet occupies what the NP itself represents is a far less sustainable location than Barns Green.</p> <p>It is submitted his site should not be selected over other sites around Barns Green which represents a far more sustainable location. It is submitted the school also represents a community use which should be safeguarded until the potential for alternative uses are explored such as housing.</p> <p>It is submitted the NP should therefore focus on allocating housing sites close to the edge of Barns Green in place of this site.</p> |
| <p>Policy 10 - Ithingfield Old School Site - Ithingfield</p> | |

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| 9 (HDC) | <p>Representations ask for consideration to be given to the heritage interest of the non-designated historic national school. In addition, representations state there should also be consideration of the proposed development to the potential impact to the setting of Itchingfield House (Grade II Listed Status). It is submitted a separate criterion is added to reflect consideration of the heritage asset (Itchingfield House).</p> |
| WSCC Services Response) | <p>Representations submit it should be noted that parking should be in accordance with the latest WSCC Parking Standards adopted in August 2019.</p> |
| 13 | <p>Representations state no firm views on whether it should be used for either residential or commercial use. Representations state the playing field should not be developed in my opinion. Representations submit 79% of residents said Greenfield sites should not be developed.</p> |
| 16 | <p>Representations recommend Page 49, photo of school playing fields should be updated to one showing the whole of the playing field including the nearby housing and buildings adjacent to the plot. Representations state the proposal from the residents was to develop the school and playground area not the playing field. It is considered anything more is unattractive and disproportionate to the Hamlet of Itchingfield. Representations state most people drive these days so to get from Itchingfield Hamlet or Barns Green to Christ's Hospital station. Representations state the proximity of Barns Green Vs Itchingfield to CH station has little credence when both residents would need to drive to the station to catch transport links. The Hamlet already has vitality and a viable mixed aged population and demographic. Representations submit that Page 51, 6.5.9 clause is misleading as firstly the majority of residents who expressed a view do not live in the hamlet therefore the 'majority' will not be affected by the proposal. Representations submit that local residents view is that just the school and playground should be developed is not stated anywhere in the document and should be included for a fair and true representation. Representations recommend the term 'this derelict site' is updated to 'the school buildings and playground to be developed' and reinstate the 'greenfield' element (playing fields).</p> |
| 17 | <p>Representations suggest inclusion of expected quota for affordable housing in the proposed 20 dwellings in Itchingfield. Representations submit that the NDP needs to incorporate in the policy a pre-emptive drive to plant broadleaved trees, as endorsed by the Woodland Trust, in order to reduce this effect and should ideally be instigated before the initiation of housing development of the two proposed sites.</p> |
| 18 | <p>Representations set out support for the regeneration of the school site but queries where is the justification to develop the adjacent field. Representations questions the need to include 6.5.2.4 as it could be used as an argument by developers to challenge the plan and seek additional housing. Representations state new residents will only have "close links to transport solutions" if they use their cars first. It is considered this is not a sustainable statement.</p> |
| 29 | <p>Representation set out support for the development at the Old School Site at Itchingfield. This land has previously been developed and as such is ideally located for future development without compromising the parish's green fields. It is preferable to the site's current existence.</p> |
| 30 | <p>Representation set out support for the development at the Old School Site at Itchingfield. This land has previously been developed and as such is ideally located for future development without compromising the parish's green fields. It is preferable to the site's current existence.</p> |
| 7 | <p>Representation set out support for Policies 11 and 12 as these are considered appropriate to maintain the character of the area and ensure that development is of a high quality and sustainable.</p> |
| 9 (HDC) | <p>Please ensure the Policy is NPPF compliant – neighbourhood plans should play an important role in identifying the special qualities of each area (Para 125 - NPPF). The policy should make explicit what local materials and detailing should be used to positively respond to the vernacular. Please consider revisiting the criterion as listed in Policy 11. For example, reference is made to criterion 1. 'Be of high quality design and layout.' This will be difficult to quantify for officers as is criterion 5. It could be interpreted in many ways.</p> |
| 16 | <p>Representations include invitation to all members of the Itchingfield parish council and the Steering Committee to come into our home and view the proposed development site from our property, since the orientation of our house looks out directly onto the proposed housing estate. We will be majorly impacted by all accounts listed above.</p> |
| 7 | <p>Representation set out support for Policies 11 and 12 as these are considered appropriate to maintain the character of the area and ensure that development is of a high quality and sustainable.</p> |
| Policy 11 - Design Parameters | |
| Policy 12 - Sustainable Design | |

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| | 9 (HDC) | No further comment |
| Policy 13 - Housing Mix | 6 | Representations set out it is considered that reference to "centrally located level sites suited to older residents" contradicts Policy 18 of the HDPF which states in respect of continuing care retirement communities that these will "normally" be located within defined Built-Up Areas. To resolve the contradiction of Draft Policy 13 with an adopted Development Plan policy, representations recommend that the final sentence contained within Draft Policy 13 is deleted, so that the Neighbourhood Plan does not obstruct the delivery of adopted HDPF Policy 18. |
| | 7 | Representations set out that it is considered the Policy is highly prescriptive and considers that introducing such a policy would be inconsistent with past patterns of development. Representations consider the Policy should be more flexibly worded as follows: " <i>Development proposals should provide a mix of housing suitable for all ages, household sizes and incomes in the local community, subject to the development needs of the particular sites and any Policy in relation to that site. This includes centrally-located level sites suited to older residents.</i> " |
| | 9 (HDC) | Representation confirm the assumption is that housing mix is support by qualitative and quantitatively evidence. |
| | 18 | Representations query why is this principle only an Aim and not a Policy. |
| Policy 14 - Parking Provision | 7 | Representations set out support for the Policy and sets out that development should provide sufficient parking for residents and visitors. |
| | 9 (HDC) | No further comment |
| Policy 15 - Traveller Sites | 9 (HDC) | It is submitted the policy does not meet some of the 'basic conditions' set out in paragraph 8(2) of Schedule 4B of the Town and Country planning Act 1990. It is considered when the Plan comes before an Inspector at Examination it is likely to be found 'unsound'. The relevant conditions are: "(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area), (f) the making of the order does not breach, and is otherwise compatible with, EU obligations" With regard to (e) the strategic allocation of Travellers pitches, it is submitted this has been considered by the Local Planning Authority supported by robust evidence base to demonstrate the provision of 5 years of deliverable sites and local need. It is submitted such evidence compiled in accordance with 2015 Planning Policy for Traveller Sites (PPTS) should be presented as part of the evidence base to support a robust policy in the plan. Representations confirm support is given to those neighbourhood plans who seek to allocate suitable traveller sites within the plan in accordance with national guidance. It is considered the provision of travellers pitches throughout the district should be evidence led and in the absence of robust supporting evidence the justification for the inclusion of the proposed policy in the Neighbourhood Plan would also be found to be incompatible with condition (f), as the government guidance is that there will be replacement obligations specific to the UK if Brexit goes ahead. Additionally, it is submitted policies must comply with current UK Equalities legislation. The Equalities Act 2010 states that discrimination on grounds of race or ethnic origin is unlawful, and this will apply to the gypsy and traveller community. It is submitted the proposed emerging policy removes the opportunity to consider provision for a particular community within the parish, and if challenged is unlikely to be found compliant, and so should be removed on that basis. |
| | CHAPTER 7 - ECONOMY | |
| Policy 16 - Small-Scale Businesses | 18 | Representations submit they would expect the number of "self employed" and home workers to have been under recorded. |
| | 9 (HDC) | Representations state the promotion of small-scale enterprise in rural areas is very important and should be commended. It is considered the policy is quite lengthy and could be more concise as there are several parts to it. It is confirmed the rural economy is considered to be very important to the wider Horsham economy. Nevertheless, there are existing small businesses in the rural areas such as equestrian centres and small rural businesses in converted properties. Care should be taken not to restrict expansion of existing business premises if appropriate but also avoids speculative commercial proposals which is unplanned. |
| | 18 | Representations state there is a clear need to differentiate between "business" which implies a distinct and separate premises and "self-employment" such as a plasterer, physiotherapist or business consultant." It is considered the needs of these two groups are distinct and should be addressed differently within the Policy. |

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| | 24 | Representations support development of small scale business at the Summers Pond site. |
| CHAPTER 8 - TRANSPORT | | |
| General | 7 | Representations set out support for paragraph 8.3 and acknowledge that the bus service is infrequent and timed at inconvenient periods. |
| | 16 | Representations query what potential road improvements would be included in the plans help to mitigate increased traffic flow? |
| Aim 8 - Pedestrian Pavements | 9 (HDC) | Representation set out support given to the importance of surfacing material of footpaths. It is suggested wording for this aim is: <i>IPC will support development proposals which include the provision of pedestrian pavements allowing safe passage for pedestrians past and through the development. The footpaths should be treated with suitable surfacing materials that reflect the rural character of the district. Black tarmac used for both footpaths and roads should be avoided.</i> |
| | 16 | Representations submit that it may be acceptable to the Summers Pond development, but not in Ictingfield, unless the path is included within the boundary of the housing estate. |
| SA COMMENTS | | |
| | Commenter No. | Summary of Comments |
| | 6 | It is submitted the site promoters site (and at Wellcross Farm) scores very similarly to the two sites proposed for allocation in the SA which accompanies the Draft NP. It is submitted the Site should have scored more highly in terms of objective 1 (the site is not highly visible, there are suburban features which contribute its setting, we are proposing enhancements), objective 2 (we are proposing net biodiversity gain) and objective 8 (the site is in proximity to two bus stops with convenient connections to footpath / PRoW network for pedestrians/cyclists plus a CCFC has on site private transport service for its residents). |

8. HOW THE MAIN ISSUES HAVE BEEN CONSIDERED

- 8.1. Paragraph 15(2)(d) requires the Consultation Statement to describe how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.
- 8.2. Section 7 detailed the stakeholder feedback in Table 1.
- 8.3. Table 2 set out below, summarises comments received and how these have been taken into consideration in preparing the Submission Version INP (Regulation 16). This is presented thematically, for ease of cross-reference to the INP.

TABLE 2

STAKEHOLDER FEEDBACK WITH COMMENTS

| AIMS/POLICIES | | | |
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| Aim /Policy | Commenter No. | Summary of Comments | Updates/Changes to INP |
| General | 8 (Environment Agency) | Representations state based on the environmental constraints within the Plan area, the Environment Agency have no detailed comments to make in relation to the Plan at this stage. | Comments noted. No changes to INP. |
| | 9 (HDC) | Representations recommend reference to 'Proposals Map' is replaced with 'Policies Map' as this is the terminology used in planning legislation. The Policies Map shows allocations and designations arising from policies in the local plan or Neighbourhood plan and at the current time these are not sufficiently clear. The Policies Map should be a map which: (i) identifies the location and boundaries of allocations and designations; (ii) is reproduced from, or based on, an Ordnance Survey map; (iii) shows National Grid lines and reference numbers; and (iv) includes an explanation of any symbol or notation which it uses. Representations submit that it follows all policies relating to landuse should be delineated on the policies map – proposed local green spaces, proposed buffer zones, designated play spaces and any proposed cycling or pedestrian links. Representations submit an objective that explicitly refers to the conservation of the historic environment with reference to new development would strengthen the plan. | Comments noted. Proposals Map updated to read 'Policies Map' Policies Map to include; proposed local green spaces; proposed buffer zones; designated play spaces; and proposed cycling or pedestrian links |
| | | Representations recommend checking chapter listing – there are two 'chapter 4s'. | Comments noted. Additional historic environment Strategic Objective included in INP. |
| | | Representations set out support to retain existing leisure and recreational opportunities and to maintain and enhance community facilities; however there was no detail as to how this would be achieved. | Comments noted. IPC to prepare priority list to detail infrastructure projects. |
| | | Representations confirm HDC has sought confirmation from local groups to commit to a full or partial review of Neighbourhood Plan once the District has completed a review of its Local Plan in 2021. Representations state a statement in the plan to provide this clarity would be appropriate. | Comments noted. Chapter numbering updated. |
| | | Representations state Natural England does not have any specific comments on this draft neighbourhood plan. | Comments noted. No changes to INP. Chapter 9: Monitoring and Review sets out IPC's commitment to undertake a review as requested by HDC. |
| | 10 (Natural England) | | Comments noted. No changes to INP. |
| | 11 (Sport England) | Representations set out that it is essential that neighbourhood plans reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Para 96 and 97. It is submitted that it is important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. In line with the Government's NPPF and Planning Practice Guidance representations submit consideration should also be given to how any new development, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this. | Comments noted. No changes to INP. |
| | 12 (WSCC Serv/ices Response) | Representations set out that whilst WSCC welcoming the decisions of so many parishes to prepare Neighbourhood Plans, the County Council does not have sufficient resources available to respond in detail to Neighbourhood Plan consultations unless there are potentially significant impacts on its services that we are not already aware of, or conflicts are identified with its emerging or adopted policies. Representations state WSCC expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals. Representations set out West Sussex Waste Local Plan 2014 (WLP) and the West Sussex Joint Minerals Local Plan 2018 (JMLP) form part of the development plan for Itchingfield as well as the Horsham District Planning Framework, as such the Waste and Minerals Plans should be mentioned alongside the Local Plan for Horsham. Representations set out the entire area of the Parish is safeguarded under Policy M9 of the Joint Minerals Local Plan and part of the Parish is safeguarded under Policy W2 of the Waste Local Plan. The Parish may wish to consider if they want to include reference to this in their Plan. | Comments noted. Evidence Base updated to detail West Sussex Waste Local Plan 2014 (WLP) and the West Sussex Joint Minerals Local Plan 2018 (JMLP) |

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| 6 | <p>Objectives</p> <p>Representations set out support for the recognition within the draft Neighbourhood Plan of the requirement to provide adequate and appropriate housing for the future needs of the parish. However, it is considered that this objective should go further and explicitly reference the critical local need to provide accommodation for the ageing population, as referenced in Chapter Two.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>The INP has sought to address the housing needs of the Parish. The Plan is silent on the need for assisted living and is therefore is reliant on HDC's policy framework in relation to this matter.</p> |
| 13 | <p>Representations state they are disappointed the Steering Group decided not to have their meetings in public like the full council.</p> <p>Representations submit in order to obtain a greater engagement, a summary of the key factors written in a more simplistic way should have been prepared on 1 or 2 pages of A4 paper.</p> <p>Representations recommend when the plan is agreed and shortly before any construction commences a liaison committee should be formed comprising of the developer, parish council and residents who are going to be inconvenienced.</p> <p>Representations submit on Page 11 Section 1.6.6 states that a summary of all representations will be made public. It is submitted you the full details of every response should be made public and not summarised or edited, as the council or the examiner should see the full details, so there can be no ambiguity.</p> <p>Representations submit on Page 10 Section 1.5.4. It says the exhibition was held in January 2017. I believe this to be incorrect as it was held on Saturday 20th January 2018.</p> <p>Representations submit on it is frequently mentioned in the minutes of the Steering Group that the site assessment forms would be published. It is submitted this never happened and the first time residents were able to access this information was when the draft plan was published on 1st November 2019.</p> <p>Representations submit they wish to record, yet again that they live opposite Summers Ponds (Site 19) and whilst they will be impacted by the site during and after construction through parking and other issues, they have no objections to some development in the field opposite North Cottage. This would be subject to some assurances. In addition representations submit they have no objections to the proposed commercial development. However there are objections to the overall scheme that is being proposed.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| 14 | <p>Representations set out serious concerns regarding the competent and impartiality of the plan's authors and the evidence basis used within its development.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| 16 | <p>Representations submit the INP should state the % of residents who are in support of what is proposed.</p> <p>It is submitted the INP does not reflect the fact that the % of residents in the Itchingfield Hamlet is very small in comparison to the rest of the parish.</p> <p>Representations submit there is no mention of Bashurst Hill.</p> <p>Representations submit the "Itchingfield High Street" photo should read Itchingfield Road.</p> | <p>Comments noted.</p> <p>Photo of Itchingfield High Street updated to read "Itchingfield Road".</p> |
| 18 | <p>Representation submit consideration should be given to a summary of the key points of the plan to be attached to any voting slip.</p> <p>Representations submit that the Framework covers 15 years from adoption, assuming this occurs in 2020 then Village Strategic planning is covered until 2035, not 2031 as stated in the forward and clause 12.1.0.</p> <p>Representations submit that Section 2.5 should be "Barns Green and Itchingfield today."</p> <p>Representations submit that 2.5.2 - Bashurst Hill should be incorporated within Itchingfield not identified as separate.</p> <p>Representations state with respect to Flood Risk Zones - Need to understand what Flood Zones 1/2/3 mean and what a Category 2 settlement. Without this understanding no valid comment can be made.</p> <p>Representations oppose Greenfield development within the Parish.</p> <p>Representations query how binding policy wording is? Representations submit Policies need to clearly state: Must, Should, Can or May.</p> <p>Representations query how views be considered to be without evidence?</p> | <p>Comments noted.</p> <p>Paragraph 2.5 updated to read "Barns Green and Itchingfield today."</p> |
| 20 | <p>Representations submit the plan has clearly identified the "least worst" options available to provide a solution for almost all of the 61 housing plots that have to be found.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |

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| | 21 | Representations submit the plan has clearly identified the 'least worst' options available to provide a solution for almost all of the 61 housing plots that have to be found. | Comments noted. No changes to INP. |
| | 26 | <p>Representations set out agreement with the Draft proposals, sites, considerations and potential.</p> <p>Representations state one issue they would like to enrich, is contained in the background info and state this does not materially affect the Plan.</p> <p>Representations submit there is a wealth of Inventory, Manors/Rapes and built environment references available and documentation is shared with the PC.</p> <p>Separately, representations comment on the early process of this consultation.</p> <p>It is submitted that it appeared that HDC would only be looking at sites of 10+ units, and so the representer submitted a proposal which described 5 scenarios for our site, all reflecting each of the criteria.</p> <p>Representations ask the PC to consider the language that is used when asking Parishioners to use their time, to perhaps plan the questions they may ask, and most of all, to refrain from making assumptions and judgements based on personal experience rather than evidence and fact.</p> | Comments noted. No changes to INP. |
| | 27 | Support without modifications. | Comments noted. No changes to INP. |
| | 28 | <p>Representations set out agreement with aims to preserve ecology, biodiversity and to do everything we can to 'resist climate change'. Representations query who is going to ensure that these measures are adhered to and that these assets are really protected?</p> <p>Representations state an excellent traffic survey has been completed.</p> <p>Representations confirmed it would be good if the banked area in front of the court could be planted with a hedge or some trees which would soften the appearance and do something wonderful for the wildlife.</p> <p>Representations submit Barns Green is an expanding village in terms of population, but it doesn't have to expand in terms of development. Representations submit the two major sites where development has been approved are well chosen.</p> <p>Representations submit the surrounding villages are being swamped by building, light and car pollution at an alarming rate and that Barns Green does not have to take an intensive building project.</p> | Comments noted. No changes to INP. |
| CHAPTER 4 - ENVIRONMENT AND HERITAGE | | | |
| General | 16 | <p>Representations submit Bashurst Hill reference is missing and recommend the following text is included:</p> <p>X% of residents live in the Itchingfield Hamlet</p> <p>X% of residents live in Bashurst Hill.</p> | Comments noted. Information relating to Bashurst Hill included in INP |
| Aim 1 - Prevention of Coalescence | 3 | <p>Representation submit further consideration should be given to the potential for appropriate development to be brought forward around Christ's Hospital railway station, including land to the west of the station.</p> <p>Representations submit the wording in respect of "perceived separation" is not considered appropriate and should be deleted. Consider the policy should refer to physical separation.</p> | Comments noted. See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage. Aim 1 updated to read: IPC will not support development in areas which would undermine, individually or cumulatively, physical separation between this parish and the parishes that surround it (Billingshurst, Boradbridge Heath, Slinfold and Shipley). It is considered vitally important, to ensure the openness and rural character of the parish, that these open areas are protected and maintained. This will be done by offering full support to HDC to in implementing HDPF Policy 2 and the relevant policy of the Local Plan Review. |

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| Policy 1 - Green Infrastructure Conservation | 9 (HDC) | <p>Representations set out support to the policy especially the final section which references clear government guidance with regards to achieving a net gain in biodiversity.</p> <p>Representations 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. Representations query whether this part of the policy be inserted directly to Policies 8 & 9?</p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>No changes recommended given the policy positive seeks to ensure proposals do not result in the loss of green infrastructure and wishes to ensure proposals demonstrate how they intend to achieve a net gain in biodiversity.</p> |
| | 16 | <p>Representations submit the document does not explain how the developers would compensate for the loss of the green infrastructure or protect the existing ecosystem. Representation submit an additional section should be included to outline how examples of how this will be achieved with both proposed developments.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| | 18 | <p>Representations submit the INP should be a clearer or a more forceful statement about potential compensation provided.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| | 9 (HDC) | <p>Representation query whether Policy 2 would be applicable to all development including one infill proposal? Representation seek clarification on where the threshold of 5 dwellings originates from with regards to Policy 2 (f).</p> <p>Representations set out a suggestion to apply the criterion directly to allocations policies.</p> | <p>Comments noted.</p> <p>Policy amended to remove reference to 5 dwellings.</p> |
| Policy 3 - Heritage Assets and Itchingfield Conservation Area | 9 (HDC) | <p>No further comment.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| | 16 | <p>Representations state the sentence which reads 'well-built, well designed, low density development would be welcomed.' should be deleted as it is supposition and is not supported by the residents of Itchingfield Hamlet.</p> | <p>Comments noted.</p> <p>Paragraph 4.7.3 updated to read: "IPC would welcome well-built, well designed, low density development."</p> |
| | 18 | <p>Representations query whether the sentence which reads 'well-built, well designed, low density development would be welcomed.' can be deleted.</p> | <p>Comments noted.</p> <p>Paragraph 4.7.3 updated to read: "IPC would welcome well-built, well designed, low density development."</p> |
| CHAPTER 5 - COMMUNITY INFRASTRUCTURE | | | |
| Policy 4 - Protection of Open Spaces | 9 (HDC) | <p>Representation ask if further protection is required or merited. For example, Ancient Woodland is protected under existing legislation and community assets such as playing fields are also protected through existing HDPF policy (43).</p> <p>Representations set out that it would be useful and necessary to delineate such assets on a policies map.</p> <p>Representation set out a suggested amendment as follows:</p> <p><i>'Development proposals shall, where possible and consistent with other policies in this Plan, include measures which provide a mix of formal and informal open space to meet the needs generated by the development. Open space is to be of high quality and serve local need.'</i></p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>No changes recommended given the Policy seeks to protect existing spaces; and sets out conditions for replacing existing uses and the loss of facilities.</p> |

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| | 17 | <p>Representations submit the Plan should consider inclusion of protection of the woodland adjacent to the Jubilee Field and the Aboetum as this is likely to be ancient. Suggest the naming of these woodlands as priority areas for protection within Barns Green.</p> <p>Representations submit a statement is needed here to elucidate and elaborate upon the concept of 'social benefit' as there needs to be explicit recognition of the weighting needed to passive aspects of open green spaces as well as active.</p> <p>Representations submit a statement is needed to confirm the effect that proposals need to involve consultation with the residents of Barns Green and have an 'independent' analysis of the results.</p> <p>Representations submit a case could be made in line with the biodiversity conservation (5.6.3) section of the plan to re-designate the Jubilee Field as a locally relevant habitat site.</p> <p>Representations submit it should be recognised within this plan that the Jubilee Field meadow contributes to the iconic views of the village and should be preserved.</p> <p>Representations submit Policy 4 needs to be clearer in its terms of reference in relation to the definition of 'surplus to requirements' and those agents involved in these decisions.</p> <p>Representations submit the Neighbourhood Development Plan ought to be designed to project allocation of open spaces for a population that is expected to rise in the next fifteen years. The equitable allocation of natural spaces (e.g. Jubilee Field), formal spaces and sporting field per person is to be encouraged and needs to be more explicit in the policy.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| | 19 | <p>Representations set out concern to turn the jubilee field into a rugby pitch or multi-purpose sports field.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| <p>Policy 5 - Protection of Green Infrastructure</p> | 9 (HDC) | <p>Representations set out that while hedgerows and individual trees do not need to be identified on a policies map but identification of local landmarks such as Asmiles Community Orchard and specific river corridors should be denoted on a policies map. Representations confirm this will provide clarification for all stakeholders (landowners, developers, local residents, officers) and avoid any potential disputes.</p> | <p>Policies Map updated to include local landmarks referenced by HDC.</p> |
| <p>Policy 6 - Community Facilities Protection</p> | 6 | <p>Representations submit the application for the community care retirement community will incorporate on site community facilities. Therefore representation state Turely support the recognition within Policy 6 of the need to protect existing community facilities and consider the policy should also encourage schemes to deliver additional facilities where appropriate to do so.</p> | <p>Comments noted.</p> <p>Policy 6 updated to include support for the provision of new/additional community facilities.</p> |
| | 9 (HDC) | <p>Representations submit reference to comments relating to Policy 4 regarding community infrastructure.</p> <p>Representation set out it is considered Policy 6 is similar to HDPF 43 so query whether the inclusion of Policy 6 bring added value to the emerging plan. It is considered such policy provision for a neighbourhood pan bring about a 'local' perspective and identified specific local community facilities which requires protection.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>Policy includes details to avoiding the loss and substantial alteration to existing community facilities.</p> |
| <p>Policy 7 - Education Facilities Development</p> | 9 (HDC) | <p>Representation recommend WSCC education authority is consulted and (potential) expansion is agreed with the education authority. Criterion (a) may not be possible but it is acknowledged in the policy itself.</p> <p>Representations recommend any land is safeguarded and denoted on a plan to ensure clarification.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>No land safeguarded.</p> |
| <p>CHAPTER 6 - HOUSING</p> | | | |
| <p>General</p> | 9 (HDC) | <p>Representation confirm HDC have provided an indicative housing target of 61 dwellings in the Plan period. Comments note the INP is promoting 2 sites which will facilitate the delivery of 52 dwellings over the plan period with the remaining shortfall of 9 dwellings to come from windfall allowance for the parish. Representations confirm this approach is aligned with national guidance.</p> <p>Representations submit a policy for a windfall allowance of 9 dwellings to come forward in the Plan period would be appropriate to meet the indicative housing requirements. It is submitted care must be taken to avoid the issue of double counting for the purposes of monitoring in relation to recording the wider windfall allowance for the district.</p> | <p>Comments noted.</p> <p>Windfall Development Policy included in INP.</p> |

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| 3 | <p>Representation submit it is considered that housing-led development in the vicinity of Christ's Hospital Station would not only be appropriate over the life of the Plan, but would also potentially be capable of delivering further new and upgraded parking facilities in connection with the station</p> <p>Considered more detailed consideration of both sites 2a and 2b could be undertaken that would lead to their identification as the sites being available, suitable and developable during the life of the Neighbourhood Plan.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| 4 | <p>Representations submit it is considered capacity of land to the rear of Sunnycroft, Two Mile Ash Road falls below the required threshold of inclusion within the SHELAA, however it is considered this should not prevent the Neighbourhood Plan from considering the site for residential development. Representations submit the site should be allocated for residential development.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| 5 | <p>Paras 6.3 through to 6.5, Policy 9 & Policy 10.</p> <p>Representations set out objection to the Plan due to the reasons given for the dismissal of Site 28 in the Site Assessments document, and the corresponding proposed allocation of the Summers Pond and Old School sites for new housing.</p> <p>Representations state it is considered that in coming to the conclusion that Site 28 is <i>unsuitable for development</i>, the main reason given in the Site Assessment is that the existing agricultural tenancy raises a significant question mark over the deliverability of this site, with the tenant 'having made it clear that he will resist any attempt to terminate the</p> <p>Representations also state that the Tenant is also the owner of Summers Pond site.</p> <p>Representation confirm that it has previously pointed out to the Parish Council in July 2018, that termination of this tenancy is not within the tenant's gift as the landlord is entitled to serve a notice terminating any existing tenancies if planning permission is granted for a use other than agricultural. Representations state this is a factual position, and therefore the site is available for development.</p> <p>With respect to the SHELAA, representations confirm the site <u>was</u> identified as 'deliverable housing site' in the 2009 SHLAA.</p> <p>Representations state the status of Site 28 was changed to 'Not Currently Deliverable' in 2015, although no reasons were given at the time as to why this change from 'deliverable' to 'not currently deliverable' had taken place.</p> <p>Representation consider the Plan should make provision for what should occur in a situation where one or both of the preferred housing sites fail to come forward within an acceptable timescale.</p> <p>Representations set out</p> <ul style="list-style-type: none"> • The site gently rises, rather than slopes, and is surrounded by a cordon of mature tree belts on all three sides. It is not considered housing on the site would be 'highly visible', particularly in the case of a sympathetically designed and well landscaped proposal. • The presence of listed buildings should not prevent a well-designed and sympathetic scheme coming forward. Consider there is no reason why an appropriate development would be harmful to the setting of the existing listed buildings. • Site 28 is relatively small, and any development would be sympathetic in scale & kind to the village. • Suitable & acceptable vehicular access would have to be demonstrated during the detailed planning process. <p>Representations note Policy 9 of the draft Neighbourhood Plan states that providing a safe vehicular access is also an issue for the Summers Pond site to overcome in due course. Representations state this has not hindered it's allocation as a preferred housing site in the draft Plan.</p> <ul style="list-style-type: none"> • Site 28 is situated immediately adjacent to the existing boundary of the Built-Up Area in Barns Green. It is considered the site is an appropriate location for a long-term expansion of the village. • Should Site 28 be developed, the infrastructure would have to include a Sustainable Urban Drainage System which captures the surface water run-off in a storm event and releases it over a much longer period directly into the network, thus removing the current source of flooding. • Density not out-of-keeping with the village. Development of Site 28 would result in a density entirely in keeping with the character of the village. | <p>Comments noted.</p> <p>No changes to INP.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |

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| <p>6</p> <p>Representation confirm opposition to the Plan.</p> <p>Representation confirm they are the agent acting for their client's land at Wellcross Farm, east of Five Oaks Road where a planning application has been submitted for a proposed continuing care retirement community.</p> <p>Representations submit the Needs Assessment, produced by Contact Consulting, submitted alongside the current planning application quantifies that there is a current shortfall of 492 units of Extra Care across the District.</p> <p>Representations state there is a critical need for retirement communities to address the rapidly ageing population, which is only exacerbated with the supply of new housing in general at a national level consistently failing to keep pace with growth in the population. It is considered there is a significant disparity between the identified needs of older people and the adopted and emerging Development Plan context to provide for those needs.</p> <p>Itchingfield Parish Need</p> <p>Representations submit the 'Housing Needs Indicative Requirement October 2018' is silent on the issue of older person's accommodation. It sets out the report extrapolates affordable housing need to conclude an indicative housing number of 61 dwellings for Itchingfield Parish, based on the mid-point of the HDPF Local Plan derived figure (19 dwellings), SHMA derived figure (83 dwellings) and Housing Needs Register derived figure (103 dwellings). It is submitted given the age of these documents, it is considered that the evidence base relied upon is out of date.</p> <p>Representation set out that figures referenced in the report are only reflective of those set out in the current HDPF 2015. Further it is stated that the report acknowledges that the housing need for the parish may need to be revised in due course to reflect updated needs which may emerge through the local plan process.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>The INP has sought to address the housing needs of the Parish. The Plan is silent on the need for assisted living and is therefore reliant on HDC's policy framework in relation to this matter.</p> |
| <p>6 Ctd</p> <p>Representation set out comments on the site assessment of Site 1 and the site criterion used to reach conclusions. Comments are set out on the following criterion</p> <ul style="list-style-type: none"> The site is remote from the BUAB of Barns Green, although adjacent to the BUAB of Broadbridge Heath. It is a Greenfield site, currently used mainly for agricultural purposes. The river Arun flows through the northern end of the site, leaving the surrounding land prone to flooding. Part of the site is listed as Historic Parkland in West Sussex Heritage Environment Record. The development would be highly visible and destroy the rural aspect of the area. The proposed development would erode the green buffer between Broadbridge Heath and Itchingfield/Barns Green. The houses would be convenient for Christ's Hospital railway station and School, but far distant from shops, public transport and other village amenities. The housing development would constitute a detached outpost from the village centre. There would be significant road safety issues when vehicles exited the site, whether onto the A264 or onto Fulfords Hill, a narrow country road. There is potential for the development to adversely affect the biodiversity of the river Arun. The site is listed on the SHELAA and in the Economic Land Assessment as "Undevelopable". The size of the proposed development far exceeds the housing needs of the parish, identified by the Steering Group, under any of the available methodologies. The site will do nothing to improve or enhance the infrastructure of the parish. <p>Representation submit it is considered as currently drafted it restricts the application of Policy 18: Retirement Housing and Specialist Care (Horsham District Planning Framework). It is considered that by not including sufficient flexibility, the NP jeopardises the delivery of appropriate sites which can contribute to meeting some of the shortfall for elderly accommodation.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| <p>7</p> <p>Paragraph: 6.2.6. Representation set out it is considered that the Neighbourhood Plan should be based on the SHMA and Housing Needs Register derived figures. The Local Plan derived figure is considered to be out of date and to underestimate the actual level of need and should therefore be set aside.</p> <p>Representation submit clients land Site 18 would contribute to the Parish's housing need and provide in the region of 30 mixed dwellings.</p> <p>Modification - Representations request an updated 'indicative figure' is requested from HDC to reflect the current position as housing needs in the District are understood to have increased. Representations recommend the removal of the out of date Local Plan derived figure or otherwise include an explanation for the significant deviation between the derived figures and the effect of this on the housing need.</p> <p>Paragraph: 6.2.7 Representation submit it is considered there is a significant deviation between the figures is considered to skew the accuracy of calculated mid point.</p> <p>Modification - Representations request Local Plan derived figure should be set aside with the mid point recalculated. A mid point of 93 is considered to be more appropriate and reflective of the actual need in the Parish.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> <p>See Background Paper 'Response to Regulation 14 Pre-submission Representations in Respect of Housing Matters'.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> <p>See Background Paper 'Response to Regulation 14 Pre-submission Representations in Respect of Housing Matters'.</p> |

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| | | <p>Paragraph 6.3.5 Representation submit the 2 sites considered suitable for development do not meet the identified needs of HDC within their Strategic Housing Market Assessment and Housing Needs Register. It is submitted these figures are both higher than those identified in the Neighbourhood Plan with the current allocations amounting to only 82 units comprising 31 units and 20 units.</p> <p>Modification: Allocate further housing for the village as an additional 30 units to make a total of 82 would almost fully meet the identified needs in the SHMA (83 units) and go further towards meeting the Housing Needs Register figure (103 units).</p> <p>Paragraph: 6.5.8 Representation submit clients site would also lend itself to houses of quality design and construction with larger plots.</p> <p>Modification: Allocate further housing for the village.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> <p>See Background Paper 'Response to Regulation 14 Pre-submission Representations in Respect of Housing Matters'.</p> <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| 13 | <p>Representations state they are surprised Ropers and Cheffins Fields (Site 16) was not recommended for inclusion in the plan. Representations note whilst planning permission was refused under DC/15/0029 this was for 63 dwellings and the current proposal is for a much reduced number of 40.</p> <p>Representations state the 2018 SHELAA does confirm like the two recommended sites this one can also be considered if submitted under a NP. It adjoins the Built Up Area Boundary, and all the facilities of Barns Green are within walking distance. Representations note access from Sandhills Road could present a problem it can be overcome, and is no different from the access into Summers Ponds. It is also stated that there is also potential access from The Ashmiles Estate. It is considered it would also bring balance to developments in the village.</p> <p>Representations submit it is considered the following sites would be a better mix for the village than the ones put forward:-</p> <ul style="list-style-type: none"> • Site 7 amended to show a reduced number of dwellings on the Old School Site (not the field) circa 8 • Site 16 as submitted number of dwellings 40 • Site 19 amended to show a reduced number of dwellings subject to confirmation on certain matters 22 dwellings. | <p>Comments noted.</p> <p>Para 6.2.7 updated to read: For Itchingfield Parish the mid-point of the data sources figures was identified as 61 dwellings.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> | |
| 16 | <p>Representations recommend para 6.2.7 is updated to read "For Itchingfield Parish the mid-point of the data sources figures was identified as 61 dwellings."</p> <p>Representations recommend a link is provided in the document to the site assessments. Representations also recommend a summary of key findings as to why the other proposals were not acceptable and why the two proposed sites put forward were acceptable i.e. highlight the differences.</p> <p>Representations submit that para 6.3.7 is the Steering Committee's own opinion that this imposed development will 'enhance' the hamlet of Itchingfield. From our perspective (and others), we live adjacent to the proposed housing estate. It will massively impact our privacy and outlook. The increased environmental pollution due to the additional traffic, light and noise, will spoil the tranquil nature rich surroundings.</p> | <p>Comments noted.</p> <p>Para 6.2.7 is updated to read: For Itchingfield Parish the mid-point of the data sources figures was identified as 61 dwellings.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> | |
| 18 | <p>Representations submit paragraph 6.2.7 should state "Barns Green and Itchingfield."</p> <p>Representations query the order of event regarding the site selection process.</p> | <p>Comments noted.</p> <p>Para 6.2.7 is updated to read: For Itchingfield Parish the mid-point of the data sources figures was identified as 61 dwellings.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> | |
| 19 | <p>Representations state two sites identified for future housing make good sense and support is given for the decision to keep future housing developments within the existing village or hamlet boundaries and to resist any sort of sprawl.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> | |
| 22 | <p>Representations state Summers Ponds is the more suitable location for affordable housing not Itchingfield.</p> <p>Representations state the site of the Old School should be limited to a smaller development of larger houses which might attract families out of the Village moving from smaller affordable housing which could be released for younger couples and single occupants.</p> <p>Representations submit affordable housing needs to be in the centre of Barns Green close to amenities.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> | |

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| | 23 | <p>Representations set out opposition to the building of 32 houses on the Summers Pond Site.</p> <p>Representations state it is claimed the site is mainly Brown Field and it is not.</p> <p>Representations advise of concern to Little Slaughterford</p> <p>Representation advise of concern re close proximity to Ancient Woodland, being outside the Village boundary and the land being in a Bat feeding area.</p> <p>Representations state Chapel Road would not cope with anymore traffic.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| <p>Policy 9 - Summers Pond Site</p> | 1 | <p>Support with modifications.</p> <p>Representations set out that the most recent evidence published by HDC in respect of housing need is dated 2016, which HDC to request an indicative housing requirement for the Parish. HDC has set out the housing requirement for the parish to be in the region of 61 dwellings.</p> <p>Representations state it is considered that the proposed 'indicative figure' of 61 units should be seen as a minimum, with allocations seeking to make the most effective use of land to deliver housing numbers more directly linked with both the SHMA and HNR figures.</p> <p>The site at Summers Ponds has been actively promoted for inclusion, on behalf of Hunter Group Ltd, for a mixed use development comprising approximately 32 dwellings and 2,500sqm of commercial land.</p> <p>Representations confirm the agent is very pleased to see Summers Ponds has been carried forward to deliver a mixed use development. The inclusion of this site to provide such uses is fully supported in principle.</p> <p>Representations encourage the Parish Council to recognise the need for further flexibility in order to respond to change, and therefore the numbers of dwellings (around 32) and commercial units (around 7) as set out within emerging policy should not be seen as an arbitrary ceiling to delivering a high quality new development for the benefit of the local community.</p> <p>Representations submit it is considered that it is likely that more effective use of the land could be made, which would be unduly controlled by the policy wording and definition of 'around'.</p> <p>Representations therefore set out hope that consideration could be given to amending the introductory wording of Policy 9 Summers Ponds Site as follows:</p> <p>"Development proposals for a minimum of 32 residential units and 7 light industrial/commercial units, on land at Summers Ponds shall include the following measures: [...]"</p> | <p>Comments noted.</p> <p>No changes recommended as the term "around" which is currently included in the policy offers flexibility.</p> <p>Criteria updated to detail any light industrial/commercial units shall not exceed 2000 square metres of ground space. In addition details relating to height, design and distance to Chapel road and nearby houses included of units included.</p> <p>These details were shared and agreed with Lee Goosens, The Hunter Group on 05 February 2020 ahead of the submission INP being finalised.</p> |
| | 4 | <p>Representations submit the Neighbourhood Plan must be aligned with the Horsham District Planning Framework (HDPF). It is asserted that the allocation of Summers Pond does not reflect the aims and objectives of the HDPF.</p> <p>Representations state the site should be protected for employment uses, which would encourage the expansion of the existing businesses and support new start-up businesses – which would accord with policies 7 and 9 of the HDPF.</p> <p>Representations set out the NP should therefore focus on allocating non employment uses for housing close to the edge of Barns Green in place of this site.</p> <p>It is submitted Summers Pond site could be fully allocated for employment to support the SME businesses in this rural area.</p> <p>Representation set out the site is currently occupied for employment purposes and it has not been demonstrated that the site is no longer viable or needed for employment.</p> <p>It is submitted the site could provide for the expansion of the existing small businesses and could attract new start-up businesses.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |

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| 9 (HDC) | <p>Representations ask consideration is given to the impact of the proposal on the non-designated historic farmstead of Slaughtford farm (reference is made to the Old Farm House—records from WSCC Historical Records indicate the site was identified originally as a historic farmstead). Could the plan assist through the development or planning policy to preserve the survival of any original farm buildings or possibly enhance those features.</p> <p>Representations state given part of the site comprises of light industrial and existing agricultural uses there may be contamination in the ground as a result of years of activity. Please consider inclusion for a requirement for a contamination assessment to be undertaken as part of the policy criterion.</p> <p>Criterion 4. Remove 'where possible' and replace with wording such as 'justifiable' to ensure flexibility.</p> <p>Representations set out support for the provision of employment at Summers Pond. Representations submit there should be no net loss of employment floorspace on this site. In terms of commercial provision onsite, representations recommend consideration is given to the inclusion of a criterion in respect of the massing and size of potential commercial units onsite as it is considered large box units/sheds may not be appropriate in a rural setting.</p> | <p>Comments noted.</p> <p>No changes recommended to criterion 4 as it is given the criterion is sufficiently flexible.</p> <p>No changes recommended re Criterion 5 as this currently relates to "Little Slaughtford and its setting and/or any features or special architectural or historic interest"</p> <p>Additional criterion included re potential contamination matters.</p> <p>Criteria updated to detail any light industrial/commercial units shall not exceed 2000 square metres of ground space. In addition details relating to height, design and distance to Chapel road and nearby houses included of units included.</p> <p>These details were shared and agreed with Lee Goosens. The Hunter Group on 05 February 2020 ahead of the submission INP being finalised.</p> |
| WSCC Services Response) | <p>Representations submit it should be noted that parking should be in accordance with the latest WSCC Parking Standards adopted in August 2019.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| 13 | <p>Representations submit Section 6.3.7 states the site is largely a Brownfield Site. It is considered this is incorrect.</p> <p>Representations submit the proposed housing is to be on the field which is agricultural/Greenfield.</p> <p>Representations state 6 properties will be built very close to a Grade II listed property. Representations advise of concerns about what damage could be caused by the digging of underground work on the foundations, and provision for services.</p> <p>Representations state the field and general area is considered to be a bat sustenance area.</p> <p>Representations state it is considered 'this will just be the gateway to further development as owner and developer clearly have ambitions for greater development of the site'.</p> <p>Concerns raised in relation to density, mobile phone mast and parking arrangements.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| 14 | <p>Representations submit plan currently does not incorporate a robust methodology for assessing sites and incorporates a lack of impartiality. It is considered the site assessment documentation does not provide robust justification to support statements made. Representation state the justification for site 19 includes the following considerations:</p> <ul style="list-style-type: none"> - The Economic Land Report marks the site as Undevelopable (without giving reasons). - Development would not visually impact the rural nature of the village. - The development is away from the centre of the village. - The housing density is, on that location, acceptable. <p>Representations submit that statements appear to be highly opinionated and factually incorrect. Please demonstrate that the compilers and reviewers of the document are competent individuals.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| 15 | <p>Representations submit that parking for Summers needs addressing.</p> <p>It is submitted that the school is not large enough for a potential of 50 extra houses in the village.</p> <p>Representations query what is there to stop a spread of development across the whole of Summer Ponds?</p> <p>Representations state the field is very, very wet in winter.</p> <p>Representations submit the volume of houses is extreme and squashing them in is not in keeping with the village.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |

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| <p>Policy 10 - Old School Site - Itchingfield</p> | <p>18</p> <p>Representations state it is still unclear after carefully reading the site assessments why this site has been chosen whilst others have been discounted where they are first within the northern "arc" of the village.</p> <p>Representations submit the site is not largely brownfield as stated. Representations query how does development of this site "retain existing employment opportunities."</p> <p>Representations confirm that deeming the entire complex of Summers Ponds a "Large Commercial site" could imply that the entity it is not agricultural, greenfield or recreational but potentially available for subsequent development as a "commercial site."</p> <p>Representations submit there is a need to qualify within the assessment if Summers Ponds is a recreation business or the basis from which to initiate a substantial housing development site? Representations set out concern that development could lead to potential development of the entire site over a number of years.</p> <p>Representation set out concern that the development site is not being correctly characterised within the review and assessment process. No consideration of the potential flood risk to the development.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| <p>24</p> | <p>Representation set out concern re visibility on busy road.</p> <p>Representation set out opposition to the houses being built on the Summers site:</p> <ul style="list-style-type: none"> • The proposed plans are not in keeping to the listed building and will effect its setting; • The rural nature of the Summers site being developed into a housing estate; • Field proposed is a known bat feeding ground close to ancient woodland which is about 150m away; • Effect on the setting of the listed building; • Summers side of the road is outside the village boundary. <p>Representation set out objection to Page 44-45 - 6.3.7 as it is considered misleading.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| <p>25</p> | <p>Representation submit Paragraph 6.4.2, page 46 this section is currently an arable / grassland field and borders the boundary of the existing Listed building 'Little Slaughtertford'.</p> <p>Representations submit building new houses up to the boundary fence of the listed building will destroy this special setting.</p> <p>Representations consider the removal of the Northern section of this site from the proposal making the Northern boundary the existing entrance / access road to Summers Ponds.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| <p>29</p> | <p>Representation set out support for the land development at Summers Pond. This land has previously been developed and as such is ideally located for future development without compromising the parish's green fields.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| <p>30</p> | <p>Representation set out support for the land development at Summers Pond. This land has previously been developed and as such is ideally located for future development without compromising the parish's green fields.</p> | <p>Comments noted.</p> <p>No changes to INP/</p> |
| <p>2</p> | <p>Representations confirm the Chichester Diocese strongly supports the proposals for the Old School site.</p> <p>Representations submit the proposed density is less than that shown on either of the indicative plans submitted at the Call for Sites stage. Representations confirm the reasons for the lower density are understood and the diocese does not object to any of the details of Policy 10.</p> <p>Representations confirm only comments at this stage are those of consistency between the text and the policy. The policy uses the term around 20 residential units and "around" is defined in 6.5.10 as plus or minus 10% of the figure quoted. Paragraph 6.5.3 (b) refers to "a maximum of 20 dwellings) and sub-paragraph (c) to "up to 20...".</p> <p>Representations confirm the Diocese strongly supports the sentiments expressed in 6.5.4 regarding the derelict condition of the site. Representations confirm the Diocese has kept to its informal undertaking not to seek to preempt the neighbourhood plan with an early planning application but unfortunately the result has been that there have been repeated instances of vandalism. Having regard to the security issues and the unsightliness of a derelict site, representations confirm the Diocese will be seeking to bring the site forward for development at the earliest possible period of the neighbourhood plan.</p> | <p>Comments noted.</p> <p>Paragraph 6.5.3 (b) and (c) updated to read " around 20" as detailed in paragraph 6.5.10.</p> |

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| 4 | <p>Representation submit the site is remote from the built up area boundary, shops and village amenities.</p> <p>It is considered the proposed allocation of the Old School represents a significant proportion of the overall housing target yet occupies what the NP itself represents is a far less sustainable location than Barns Green.</p> <p>It is submitted his site should not be selected over other sites around Barns Green which represents a far more sustainable location. It is submitted the school also represents a community use which should be safeguarded until the potential for alternative uses are explored such as housing.</p> <p>It is submitted the NP should therefore focus on allocating housing sites close to the edge of Barns Green in place of this site.</p> | <p>Comments noted.</p> <p>See Site Selection Background Paper which address/respond to comments received in this regard at the Regulation 14 Pre-submission stage.</p> |
| 9 (HDC) | <p>Representations ask for consideration to be given to the heritage interest of the non-designated historic national school.</p> <p>In addition, representations state there should also be consideration of the proposed development to the potential impact to the setting of Itchingfield House (Grade II Listed Status). It is submitted a separate criterion is added to reflect consideration of the heritage asset (Itchingfield House).</p> | <p>Comments noted.</p> <p>Additional criteria with respect to: heritage interest of the school; and Itchingfield House included.</p> |
| (WSCC Services Response) | <p>Representations submit it should be noted that parking should be in accordance with the latest WSCC Parking Standards adopted in August 2019.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| 13 | <p>Representations state no firm views on whether it should be used for either residential or commercial use.</p> <p>Representations state the playing field should not be developed in my opinion.</p> <p>Representations submit 79% of residents said Greenfield sites should not be developed.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| 16 | <p>Representations recommend Page 49, photo of school playing fields should be updated to one showing the whole of the playing field including the nearby housing and buildings adjacent to the plot.</p> <p>Representations state the proposal from the residents was to develop the school and playground area not the playing field. It is considered anything more is unattractive and disproportionate to the Hamlet of Itchingfield.</p> <p>Representations state most people drive these days so to get from Itchingfield Hamlet or Barns Green to Christ's Hospital station.</p> <p>Representations state the proximity of Barns Green Vs Itchingfield to CH station has little credence when both residents would need to drive to the station to catch transport links. The Hamlet already has vitality and a viable mixed aged population and demographic.</p> <p>Representations submit that Page 51, 6.5.9 clause is misleading as firstly the majority of residents who expressed a view do not live in the hamlet therefore the 'majority' will not be affected by the proposal.</p> <p>Representations submit that local residents view is that just the school and playground should be developed is not stated anywhere in the document and should be included for a fair and true representation.</p> <p>Representations recommend the term 'this derelict site' is updated to 'the school buildings and playground to be developed' and reinstate the 'greenfield' element (playing fields).</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| 17 | <p>Representations suggest inclusion of expected quota for affordable housing in the proposed 20 dwellings in Itchingfield.</p> <p>Representations submit that the NDP needs to incorporate in the policy a pre-emptive drive to plant broadleaved trees, as endorsed by the Woodland Trust, in order to reduce this effect and should ideally be instigated before the initiation of housing development of the two proposed sites.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |
| 18 | <p>Representations set out support for the regeneration of the school site but queries where is the justification to develop the adjacent field.</p> <p>Representations questions the the need to include 6.5.2.4 as it could be used as an argument by developers to challenge the plan and seek additional housing.</p> <p>Representations state new residents will only have "close links to transport solutions" if they use their cars first. It is considered this is not a sustainable statement.</p> | <p>Comments noted.</p> <p>No changes to INP.</p> |

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| | 29 | Representation set out support for the development at the Old School Site at Itchingfield. This land has previously been developed and as such is ideally located for future development without compromising the parish's green fields. It is preferable to the site's current existence. | Comments noted. No changes to INP. |
| | 30 | Representation set out support for the development at the Old School Site at Itchingfield. This land has previously been developed and as such is ideally located for future development without compromising the parish's green fields. It is preferable to the site's current existence. | Comments noted. No changes to INP. |
| Policy 11 - Design Parameters | 7 | Representation set out support for Policies 11 and 12 as these are considered appropriate to maintain the character of the area and ensure that development is of a high quality and sustainable. | Comments noted. No changes to INP. |
| | 9 (HDC) | Please ensure the Policy is NPPF compliant – neighbourhood plans should play an important role in identifying the special qualities of each area (Para 125 - NPPF). The policy should make explicit what local materials and detailing should be used to positively respond to the vernacular. Please consider revisiting the criterion as listed in Policy 11. For example, reference is made to criterion 1. 'Be of high quality design and layout.' This will be difficult to quantify for officers as is criterion 5. It could be interpreted in many ways. | Comments noted. Policy updated to set out what local materials and detailing should be used to positively respond to the vernacular. Supporting text updated to set out a clear design vision and exceptions to provide clarity to both developers and users of the Policy. In addition, supporting text updated to set out a summary of the Parish's defining characteristics, special qualities and how this could be reflected in development. |
| | 16 | Representations include invitation to all members of the Itchingfield parish council and the Steering Committee to come into our home and view the proposed development site from our property, since the orientation of our house looks out directly onto the proposed housing estate. We will be majorly impacted by all accounts listed above. | Comments noted. No changes to INP. |
| Policy 12 - Sustainable Design | 7 | Representation set out support for Policies 11 and 12 as these are considered appropriate to maintain the character of the area and ensure that development is of a high quality and sustainable. | Comments noted. No changes to INP. |
| | 9 (HDC) | No further comment | Comments noted. No changes to INP. |
| Policy 13 - Housing Mix | 6 | Representations set out it is considered that reference to "centrally located level sites suited to older residents" contradicts Policy 18 of the HDPF which states in respect of continuing care retirement communities that these will "normally" be located within defined Built-Up Areas. To resolve the contradiction of Draft Policy 13 with an adopted Development Plan policy, representations recommend that the final sentence contained within Draft Policy 13 is deleted, so that the Neighbourhood Plan does not obstruct the delivery of adopted HDPF Policy 18. | Comments noted. Final sentence of Policy deleted. |
| | 7 | Representations set out that it is considered the Policy is highly prescriptive and considers that introducing such a policy would be inconsistent with past patterns of development. Representations consider the Policy should be more flexibly worded as follows: "Development proposals should provide a mix of housing suitable for all ages, household sizes and incomes in the local community, subject to the development needs of the particular sites and any Policy in relation to that site. This includes centrally-located level sites suited to older residents." | Comments noted. No changes to INP. The policy provides sufficient flexibility to meet the needs of the parish. |
| | 9 (HDC) | Representation confirm the assumption is that housing mix is support by qualitative and quantitatively evidence. | Comments noted. No changes to INP. Policy is supported by HDPF evidence base. |
| | 18 | Representations query why is this principle only an Aim and not a Policy. | Comments noted. No changes to INP. |

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| <p>Policy 14 - Parking Provision</p> | <p>7</p> | <p>Representations set out support for the Policy and sets out that development should provide sufficient parking for residents and visitors.</p> | <p>Comments noted. No changes to INP.</p> |
| <p>Policy 15 - Traveller Sites</p> | <p>9 (HDC)</p> | <p>No further comment</p> | <p>Comments noted. No changes to INP.</p> |
| <p>Policy 16 - Small-Scale Businesses</p> | <p>9 (HDC)</p> | <p>It is submitted the policy does not meet some of the 'basic conditions' set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. It is considered when the Plan comes before an Inspector at Examination it is likely to be found 'unsound'. The relevant conditions are: “(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area), (f) the making of the order does not breach, and is otherwise compatible with, EU obligations” With regard to (e) the strategic allocation of Travellers pitches, it is submitted this has been considered by the Local Planning Authority supported by robust evidence base to demonstrate the provision of 5 years of deliverable sites and local need. It is submitted such evidence compiled in accordance with 2015 Planning Policy for Traveller Sites (PPTS) should be presented as part of the evidence base to support a robust policy in the plan. Representations confirm support is given to those neighbourhood plans who seek to allocate suitable traveller sites within the plan in accordance with national guidance. It is considered the provision of travellers pitches throughout the district should be evidence led and in the absence of robust supporting evidence the justification for the inclusion of the proposed policy in the Neighbourhood Plan would also be found to be incompatible with condition (f), as the government guidance is that there will be replacement obligations specific to the UK if Brexit goes ahead. Additionally, it is submitted policies must comply with current UK Equalities legislation. The Equalities Act 2010 states that discrimination on grounds of race or ethnic origin is unlawful, and this will apply to the gypsy and traveller community. It is submitted the proposed emerging policy removes the opportunity to consider provision for a particular community within the parish, and if challenged is unlikely to be found compliant, and so should be removed on that basis.</p> | <p>Comments noted. The Policy has revised in line with HDC comments and included as an Aim in INP.</p> |
| <p>CHAPTER 7 - ECONOMY</p> | | | |
| <p>General</p> | <p>18</p> | <p>Representations submit they would expect the number of “self employed” and home workers to have been under recorded.</p> | <p>Comments noted. No changes to INP.</p> |
| <p>Policy 16 - Small-Scale Businesses</p> | <p>9 (HDC)</p> | <p>Representations state the promotion of small-scale enterprise in rural areas is very important and should be commended. It is considered the policy is quite lengthy and could be more concise as there are several parts to it. It is confirmed the rural economy is considered to be very important to the wider Horsham economy. Nevertheless, there are existing small businesses in the rural areas such as equestrian centres and small rural businesses in converted properties. Care should be taken not to restrict expansion of existing business premises if appropriate but also avoids speculative commercial proposals which is unplanned.</p> | <p>Comments noted. No changes to INP. Policy is presented in two parts to deal with: the expansion of small scale businesses and the provision of new businesses.</p> |
| <p>Policy 16 - Small-Scale Businesses</p> | <p>18</p> | <p>Representations state there is a clear need to differentiate between “business” which implies a distinct and separate premises and “self-employment” such as a plasterer, physiotherapist or business consultant.” It is considered the needs of these two groups are distinct and separate and should be addressed differently within the Policy.</p> | <p>Comments noted. No changes to INP.</p> |
| <p>Policy 16 - Small-Scale Businesses</p> | <p>24</p> | <p>Representations support development of small scale business at the Summers Pond site.</p> | <p>Comments noted. No changes to INP.</p> |
| <p>CHAPTER 8 - TRANSPORT</p> | | | |

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| General | 7 | Representations set out support for paragraph 8.3 and acknowledge that the bus service is infrequent and timed at inconvenient periods. | Comments noted. No changes to INP. |
| | 16 | Representations query what potential road improvements would be included in the plans help to mitigate increased traffic flow? | Comments noted. No changes to INP. |
| | 9 (HDC) | Representation set out support given to the importance of surfacing material of footpaths. It is suggested wording for this aim is: 'IPC will support development proposals which include the provision of pedestrian pavements allowing safe passage for pedestrians past and through the development. The footpaths should be treated with suitable surfacing materials that reflect the rural character of the district. Black tarmac used for both footpaths and roads should be avoided.' | Comments noted. Aim 8 updated to read: <i>IPC will support development proposals which include the provision of pedestrian pavements allowing safe passage for pedestrians past and through the development. The footpaths should be treated with suitable surfacing materials that reflect the rural character of the district. Black tarmac used for both footpaths and roads should be avoided.'</i> |
| | 16 | Representations submit that it may be acceptable to the Summers Pond development, but not in Ichingfield, unless the path is included within the boundary of the housing estate. | Comments noted. No changes to INP. |
| SA COMMENTS | | | |
| | Commenter No. | Summary of Comments | Updates/Changes to SA |
| | 6 | <p>It is submitted the site which the agent is promoting, land at Wellcross, scores very similarly to the two sites proposed for allocation in the SA which accompanies the Draft NP.</p> <p>It is submitted the Site should have scored more highly in terms of objective 1 (the site is not highly visible, there are suburban features which contribute to its setting, we are proposing enhancements), objective 2 (we are proposing net biodiversity gain) and objective 8 (the site is in proximity to two bus stops with convenient connections to footpath / PPOW network for pedestrians/cyclists plus on site private transport service for its residents).</p> | <p>Comments noted.</p> <p>The SA includes an appraisal of all sites. The appraisal has been carried out in accordance with Government Guidance. It is considered the appraisals provides an appropriate and reasonable assessment of all sites. Furthermore it is considered the conclusions in respect of the impact on the SA framework are justified.</p> <p>Given the scale and character of land at Wellcross it is considered a scheme would have a negative impact on Objective 1: Conserve and Enhance the Rural Character, and Objective 2: Protect/Enhance Biodiversity. Given the existing uses and location of Site 7: Land at Old School Site and Site 19 Land at Summers these sites have possible negative on Objective 1. Site 7 and Site 19 would have a negative impact on Objective 2, which is comparable to land at Wellcross.</p> <p>It is considered land at Wellcross would have a possible negative impact on Objective 8: Improve Non-Car Modes of Transport having regard to the site's proximity to services on offer locally. Site 7, would have a significant negative on this objective given its proximity to services and facilities. Site 19 would have a positive impact given its proximity to the services and facilities on offer in Barns Green.</p> <p>It is noted submissions made do not consider the appraisal for land at Wellcross or candidate housing sites require review.</p> <p>In light of the above, no amendments are proposed to the site appraisals in Appendix 1 of the SA</p> |

9. PREPARATION OF SUBMISSION DOCUMENTS

- 9.1. The Submission Documents were prepared in March-April 2020.
- 9.2. This Submission INP and accompanying documents (Sustainability Appraisal (SA); Non Technical Summary; Basic Condition Statement; and Consultation Statement) have been approved by IPC.
- 9.3. Following a period of public consultation, the Submission INP will be subject to Examination. Subject to receipt of a positive Examiner's Report, the INP will then proceed to Referendum and be 'made' in due course by HDC.

10. SUMMARY

- 10.1. This Consultation Statement sets out how stakeholder engagement has been undertaken in accordance with Regulation 14 and 15 of the Neighbourhood Planning (General) Regulations 2012.
- 10.2. The NPSG have, throughout the plan-making process, sought to positively engage with local residents and other stakeholders.
- 10.3. Key issues that have been identified through the engagement process have influenced and shaped the Vision, Strategic Objectives, Policies and Aims of the initial and revised INP, both the Pre-submission (Regulation 14) and Submission Version (Regulation 16) documents.
- 10.4. In line with Regulation 15(2)(a) and (b) this Statement summarises all stakeholder responses received as part of the consultation and stakeholder engagement exercises; and how the INP has changed and evolved in response to Consultation feedback.
- 10.5. Where the INP has not been changed as a result of comments made at Regulation 14 stage, an explanation for this has been provided.
- 10.6. This Statement demonstrates that the INP has been the subject of robust Consultation and satisfactorily meets the requirements of the Regulations.