

APPENDIX 18

DETAILS OF REGULATION 14 CONSULTATION

**Barns Green
& Itchingfield**



Neighbourhood Plan

Pre-Submission Consultation

The draft Neighbourhood Plan is now ready for pre-submission consultation by people who live, work or do business in Itchingfield or Barns Green

That's you!

This is your opportunity to help shape the future of the Parish of Itchingfield

Please take a look at the Plan at :

www.itchingfieldndp.online/regulation14.htm

Or have a look at a hard copy of the Plan at the Primary School office, of the Village Store (during business hours) and let us have your feedback using the forms provided online.

We must have your comments by the close of the consultation period: Friday 13th December 2019.

We really look forward to hearing from you.

Itchingfield Parish Neighbourhood Development Plan 2019-2031 - Regulation 14 Consultation

This is a formal public consultation being run in accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012.

The consultation period runs from **Friday 1st November 2019 till midnight on Friday 13th December 2019**.

During this consultation we are consulting on the draft plan and associated evidence base. We are looking to gather the views of all stakeholders, particularly those who live, work or carry on business in the Parish.

The consultation documents and Response Form can be viewed in the following ways:

1. Online by visiting:

<http://www.itchingfieldndp.online> - where the documents are available to view and download.

2. Visiting the Barns Green Primary School office during office hours (weekdays 9.00am – 4.00pm) at The Hordens, Barns Green, Horsham RH13 0PJ, or the Barns Green Village Shop Chapel Rd, Barns Green, Horsham RH13 0PS where hard copies of the Plan are available to view.

All responses to this consultation must be received on the Response Form provided prior to the end of the consultation period (midnight on Friday 13th December 2019) and must include a name, address and, if relevant, the organisation you are representing.

Response Forms can be submitted:

- **By Email:** send your completed Response Form to clerk@itchingfieldparishcouncil.gov.uk Please note that this is the preferred response method and will save much volunteer/staff time collating your comments. If possible, please complete the response form on your computer and email the completed word file to us.
- **By Post:** send or take your completed Response Form to Itchingfield Neighbourhood Plan Consultation, Itchingfield Parish Council, c/o 14 Trout Lane, Barns Green, West Sussex RH13 0QD

All personal information will be processed in accordance with the Parish Council's Data Protection Policies which are detailed on its website <http://www.itchingfieldparishcouncil.gov.uk>

If you have having difficulty accessing the consultation documents, submitting your response or need help with anything else please contact the Parish Clerk by email clerk@itchingfieldparishcouncil.gov.uk and you will be contacted by someone appropriate who will be able to help.

Itchingfield Parish Neighbourhood Development Plan 2019-2031 Regulation 14 Consultation

I am writing on behalf of Itchingfield Parish Council to invite your comments on the Draft Neighbourhood Development Plan for the Parish.

The Steering Committee has been working on the plan since 2015 and have used the responses from previous community consultations to develop the draft plan.

This is a formal public consultation being run in accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012. The consultation period runs from **Friday 1st November 2019 till midnight on Friday 13th December 2019**.

What is this consultation about?

During this consultation we are consulting on the draft plan and associated evidence base. We are looking to gather the views of all stakeholders, particularly those who live, work or carry on business in the Parish. These views may relate to the proposed policies, the content and wording of the plan, whether the evidence base is appropriate/correct, whether anything the plan is missing, or anything else you would like to bring to our attention. Please be as specific as possible when providing your comments. If you have any views on the documents, we want to hear them so that we can take them into account moving forward.

Once these views have been gathered the plan and its associated documents will be amended as necessary before being submitted to Horsham District Council for examination.

How can you view the Consultation Documents?

The consultation documents and Response Form can be viewed in the following ways:

1. Online by visiting <http://www.itchingfieldndp.online> where the documents are available to view and download.
1. Visiting the Barns Green Primary School office during office hours (weekdays 9.00am – 4.00pm) at The Hordens, Barns Green, Horsham RH13 OPJ, or the Barns Green Village Shop Chapel Rd, Barns Green, Horsham RH13 OPS where hard copies of the Plan are available to view.

How can you respond to this consultation?

All responses to this consultation must be received on the Response Form provided prior to the end of the consultation period (midnight on Friday 13th December 2019)

and must include a name, address and, if relevant, the organisation you are representing.

Response Forms can be submitted:

- **By Email:** send your completed Response Form to clerk@itchingfieldparishcouncil.gov.uk Please note that this is the preferred response method and will save much volunteer/staff time collating your comments. If possible, please complete the response form on your computer and email the completed word file to us.
- **By Post:** send or take your completed Response Form to Itchingfield Neighbourhood Plan Consultation, Itchingfield Parish Council, c/o 14 Trout Lane, Barns Green, West Sussex RH13 0QD

What will we do with your data?

All personal information will be processed in accordance with the Parish Council's Data Protection Policies which are detailed on its website (<http://www.itchingfieldparishcouncil.gov.uk>)

A summary of all representations received will be made public when the plan is submitted to Horsham District Council for examination. This may include verbatim comments received.

Contact details of private individuals will not be published publicly.

Need more information/help?

If you have having difficulty accessing the consultation documents, submitting your response or need help with anything else please contact the Parish Clerk by email (clerk@itchingfieldparishcouncil.gov.uk) and you will be contacted by someone appropriate who will be able to help.

Jan Critchley

Clerk to the Council

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Itchingfield Neighbourhood Plan

Public consultation

Have your say about the future of the parish!

The Neighbourhood Plan for the parish of Itchingfield will be open for public comment from Friday 1st November, for a consultation period of 6 weeks. We are hoping to gather the views of those who live and/or work in the parish. Your views will be carefully considered and the Plan amended as necessary before it is passed over to Horsham District Council.

The Plan sets out the way in which any future development will be carried out in the parish over the next 12 years and contains Policies and Aims to incorporate the detail.

A copy of the Plan, and associated documents, can be viewed on the Plan web site: <http://www.itchingfieldndp.online/>. You can look at a hard copy of the Plan at Barns Green Primary School, at the school office.

You will also find a comment form to complete, should you wish to do so. Your comment form can be emailed to the parish clerk, or posted to her. Comments made by letter post or email will also be taken into account. All comments will be carefully considered.

Complete details of the consultation process can be found on the Plan web site and on notices to be found on the parish noticeboards. All data will be processed in accordance with the Itchingfield Parish Council Data Protection Policy, a copy of which can be found on the Parish Council web site.

The consultation period ends at midnight on 13th December 2019.

We look forward to hearing your views!

DON'T FORGET:

**The BIG Mag
is now available via email**

If you would like to receive the BIG Mag via email
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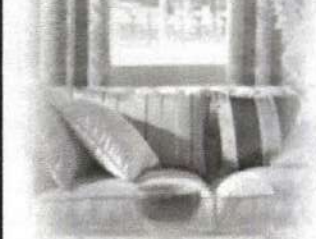
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Barns Green & Itchingfield



Neighbourhood Plan

The draft Neighbourhood Plan is now being prepared and, subject to consultation with our planning consultants and Horsham District Council, should be coming out to the residents of Itchingfield and Barns Green for formal consultation .

Two sites will be allocated for development in the Plan.

The documentation created by the Steering Group in selecting these two sites, and in rejecting the other sites, is now available for perusal on the Neighbourhood Plan web site.

Comments can be made to the Steering Group, via the Parish Clerk

[:clerk@itchingfieldparishcouncil.gov.uk](mailto:clerk@itchingfieldparishcouncil.gov.uk)

either before the draft Plan is sent round for consultation, or during the 6-week formal consultation period.

**Barns Green
& Itchingfield**



Neighbourhood Plan

Regulation 14 Pre-Submission Consultation

Your feedback matters

The draft Neighbourhood Plan is now ready for pre-submission review by people who live, work or do business in Itchingfield Parish.

That's You!

This is an opportunity to help shape the future of the Parish.

Your input is strongly encouraged

Online www.itchingfieldndp.online/regulation14.htm
In person Barns Green Village Store & Post Office; Primary School
Deadline Comments must be received by Friday 13th Dec. 2019



Barns Green
& Itchingfield



Neighbourhood Plan

Regulation 14 Pre-Submission Consultation

Your feedback matters

The Barns Green & Itchingfield Neighbourhood Plan is now ready for pre-submission review by people who live, work or do business in the Barns Green & Itchingfield Parish. That's You!

This is an opportunity to help shape the future of the Parish. Your input is strongly encouraged.

Online: www.barnsgreenanditchingfield.org.uk/regulation-14
In person: Barns Green Village Store & Post Office, Priory Street

Deadline: Consultation will be completed by Friday 12th Dec 2019



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VILLAGE GREEN

APPENDIX 19

RESPONSE TO REGULATION 14

PRE-SUBMISSION REPRESENTATIONS

IN RESPECT OF HOUSING MATTERS,

APRIL 2020

Response to Regulation 14 Pre-submission Representations in Respect of Housing Matters

Itchingfield Neighbourhood Plan

Prepared for
Itchingfield Parish Council

Prepared by
Laura Bourke BA MSc MRTPI

April 2020

Version - FINAL

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1. INTRODUCTION

- 1.1. This document has been prepared for Itchingfield Parish Council (IPC) following a review of representations received in response to the Regulation 14 Pre-submission Consultation.
- 1.2. The purpose of the document is to provide a summary of representations received in respect of housing matters; set out DOWSETTMAYHEW Planning Partnership's (DMP) comments on representations received; and set out any recommended changes to Chapter 6: Housing of the Itchingfield Neighbourhood Plan (INP), including planning policies and/or aims in light of representations received.
- 1.3. The recommended changes are to be considered by IPC prior to the preparation of the Submission INP.

2. ITCHINGFIELD NEIGHBOURHOOD PLAN REGULATION 14 PRE-SUBMISSION CONSULTATION

- 2.1. The INP and accompanying Sustainability Appraisal (SA) was the subject of its statutory Regulation 14 Pre-submission Consultation for an eight week period between 01 November 2019-13 December 2019.
- 2.2. 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.
- 2.3. Notice of the Consultation was posted on the Parish Council's website, on social media, and on Parish Council noticeboards. A notice was placed in the 'BigMag'. The Consultation was also advertised on banners which were displayed in the Parish.
- 2.4. 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.

3. SUMMARY OF REPRESENTATIONS RECEIVED

- 3.1. A total of 30 representations were received in response to the Regulation 14 Pre-submission Consultation.
- 3.2. Representations were received from a variety of stakeholders. These can be summarised as follows:
 - 7 representations from developers/agents acting on behalf of landowners;
 - 5 representations from statutory consultees; and
 - 18 representations from local residents.

3.3. A number of these representations made comments on housing matters. Following a review of representations received in respect of housing matters, representations have been summarised under the following key themes:

- Appropriateness of identified housing need;
- Promotion of additional housing site(s); and
- Other housing matters.

3.4. Set out below is a summary of representations received; DMP comments on these representations; and recommended changes to the Submission version INP to be considered by the IPC.

4. REPRESENTATIONS RECEIVED IN RESPECT OF IDENTIFIED HOUSING NEED

4.1. 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.

Horsham District Council (HDC)

- 4.2. Representations from HDC confirm the Council has provided an indicative housing target of 61 dwellings in the Plan period.
- 4.3. 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.
- 4.4. 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.
- 4.5. HDC state that they have started to review the Horsham District Planning Framework (HDPF) and have sought confirmation from local Parish Councils to commit to a full or partial review of Neighbourhood Plans, once the District has completed a review of its Local Plan.

White & Sons

- 4.6. Representations state that the Neighbourhood Plan should be based on the Strategic Housing Market Area (SHMA) and Housing Needs Register (HNR) derived figures.
- 4.7. Representations submit 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.
- 4.8. 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.

- 4.9. 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.
- 4.10. Representations request the 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.

Turley

- 4.11. 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 HNR derived figure (103 dwellings). It is submitted, given the age of these documents, that the evidence base relied upon is out of date.
- 4.12. Representations set out that figures referenced in the report are only reflective of those set out in the current HDPF 2015.
- 4.13. 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.

ECE Planning Hunter Developments

- 4.14. 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.
- 4.15. 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.
- 4.16. 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.

Response to Horsham District Council

- 4.17. In response to HDC comments, a Windfall Development Policy has been discussed and agreed with HDC.
- 4.18. The Windfall Development Policy will support development proposals for residential development on unidentified sites within the defined built-up area of Barns Green subject to criteria.

- 4.19. In order to ensure there is no 'double counting' for the purposes of monitoring, in relation to recording the wider windfall allowance for the District, once 9 dwellings¹ has been met through the Windfall Allowance Policy, it follows further windfalls to come forward would contribute to the wider District allowance and be recorded accordingly.

Response to White & Sons; Turley; and ECE Planning Hunter Developments

- 4.20. As an intrinsic part of the preparation of the INP, a draft Housing Needs Consideration Report was prepared in December 2017. The Report was updated in April 2018 and September 2018 to include updates with respect to the publication of the draft NPPF in March 2018 and the revised NPPF in July 2018.
- 4.21. The Reports 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; and for this to be facilitated by policies in the emerging INP.
- 4.22. The Government published the first revision of the NPPF on the 24 July 2018. To support the Government's objective of significantly boosting the supply of homes and in order to determine the minimum number of homes needed, it confirmed strategic policies are to be informed by a Local Housing Need Assessment, conducted using the standard methodology in National Planning Policy Guidance (unless exceptional circumstances justify an alternative approach).
- 4.23. The standard methodology requires Local Planning Authorities to take the Government's household growth projections and apply an affordability ratio, comparing local house prices with workplace earnings, to produce a need figure.
- 4.24. The NPPF was subsequently updated and published in February 2019. With respect 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.
- 4.25. 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."*
- 4.26. In light of this, an "indicative figure" was requested from HDC. An indicative housing requirement number was provided for Itchingfield in October 2018.
- 4.27. 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).

¹ 9 units is the residual number of windfall units to be delivered in order to facilitate the delivery of the indicative housing number of 61 units. A total of 'around' 52 units are proposed for allocation at Sumners Pond (around 32 residential units) and The Old School Site (around 20 residential units)

- 4.28. The Report confirms in order to come to an indicative number for Itchingfield Parish the key data sources (Local Plan; SHMA; and HNR) were identified. HDC confirmed these, when taken together, inform key trends. Furthermore, HDC confirmed no data source was given more weight than the other.
- 4.29. The indicative number was derived from a mid-point of the following three data sources:
1. Local Plan derived figure - 19 dwellings;
 2. SHMA derived figure - 83 dwellings; and
 3. HNR derived figure - 103 dwellings.
- 4.30. 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.
- 4.31. 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.
- 4.32. The Report confirms these figures may need to be revised in 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.
- 4.33. 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. The Plan is silent on the need for assisted living and is therefore reliant on HDC's Policy Framework in relation to this matter. As set out above, HDC have confirmed this approach is aligned with national guidance.
- 4.34. The preparation of the INP is taking place within the context of a revised NPPF and at a time HDC are embarking on a review of the Local Plan. The revised NPPF now requires Local Authorities to calculate housing need based on a standard methodology. HDC have advised this will lead to increased housing requirements for the District in the future, which will need to be planned for in the HDC's Local Plan Review. In addition, Local Authorities are also now required to set out housing requirements in their Local Plans for Designated Neighbourhood Plan Areas.
- 4.35. HDC have started its review of the HDPF to accord with the NPPF, housing delivery test, and the standard methodology. HDC has engaged with Parish Council's to ensure work streams, with respect to Plan preparation, are aligned. The Council has sought confirmation from local groups to commit to a full or partial review of their Neighbourhood Plan's once the District has completed a review of its Local Plan in 2021.
- 4.36. In light of this, INP has confirmed its commitment to undertake a review of the INP in order to take account of any revised housing numbers which are allocated to the Parish as part of the Local Plan Review. Given this approach, it is considered the INP positively plans for the current housing requirement and will subsequently take account of any revised housing numbers as part of its review.

Recommended changes to Submission INP

4.37. No changes are recommended for consideration by IPC with respect to housing need.

5. REPRESENTATIONS RECEIVED IN RESPECT OF THE PROMOTION OF HOUSING SITE(S)

5.1. A total of 5 representations were received from developers/agents acting on behalf of landowners in respect of the promotion of housing sites.

5.2. Representations were received from:

- Christ's Hospital;
- Hume Planning Consultancy;
- Miller Developments;
- Turley; and
- White & Sons.

5.3. Christ's Hospital's 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.

5.4. 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.

5.5. Hume Planning Consultancy 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.

5.6. Miller Developments 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.

5.7. 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.

5.8. Turley representations set out comments in respect of the assessment of Site 1 and the site criterion used to reach conclusions.

Response to: Christ's Hospital; Hume Planning Consultancy; Miller Developments; Turley; and White & Sons

- 5.9. IPC have considered all sites equally in an open and transparent manner. In considering the sites the environmental constraints of the sites were considered. Furthermore, consideration was given to the policy constraints of the sites with due regard being given to the requirements of National Planning Policy Guidance and the strategic policies of the Horsham District Planning Framework (HDPF).
- 5.10. Details relating to 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, is available to view in the Housing Site Selection Background Paper.

6. REPRESENTATIONS RECEIVED IN RESPECT OF OTHER HOUSING POLICIES

Policy 11: Design Parameters

- 6.1. HDC advise Neighbourhood Plans should play an important role in identifying the special qualities of each area (Paragraph 125 - NPPF). HDC submit the Policy should make explicit what local materials and detailing should be used to positively respond to the vernacular.
- 6.2. HDC recommend 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.

Response to: Horsham District Council

- 6.3. In response to comments received, it is recommended the supporting text/Policy sets out what local materials and detailing should be used to positively respond to the vernacular.
- 6.4. With respect to Criterion 1, which requires development to "*be of high quality design and layout*". and Criterion 5, which requires development to "*protect the identity and character of Barns Green and Itchingfield.*"
- 6.5. The NPPF advises maximum clarity about design expectations should be provided in order to provide a framework for creating distinctive places with a consistent and high quality standard of design.
- 6.6. In light of comments received, and in line with the NPPF, it is recommended the supporting text sets out a clear design vision and exceptions to provide clarity to both developers and users of the Policy. In addition, it is recommended the supporting text sets out a summary of the Parish's defining characteristics, special qualities and how this could be reflected in development.

Recommended changes to Submission INP

- 6.7. Recommend the Policy sets out what local materials and detailing should be used to positively respond to the vernacular.

- 6.8. Recommend the supporting text sets out a clear design vision and exceptions to provide clarity to both developers and users of the Policy. In addition, recommend the supporting text sets out a summary of the Parish's defining characteristics, special qualities and how this could be reflected in development.

Policy 13: Housing Mix

- 6.9. HDC advise of the assumption that the housing mix is supported by qualitative and quantitative evidence.
- 6.10. Turley representations submit 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.
- 6.11. 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.
- 6.12. White & Sons representations submit the Policy is highly prescriptive and considers that introducing such a policy would be inconsistent with past patterns of development.
- 6.13. 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.*"

Response to: HDC; Turley; and White & Sons

- 6.14. In response to HDC's comments, the INP is underpinned by the existing and emerging evidence base of the HDPF.
- 6.15. In order to address comments received from Turley, whilst it is noted the current Policy wording is reflective of Policy wording in the 'made' Slinfold Neighbourhood Plan, it is recommended IPC consider deleting the final sentence of the Policy, which reads "*This includes centrally-located level sites suited to older residents.*"
- 6.16. In response to White & Sons comments, no changes are recommended as it is considered the Policy as currently drafted provides sufficient flexibility to meet the needs of the Parish.

Recommended changes to Submission INP

- 6.17. No changes are recommended for consideration by IPC with respect to Policy.

APPENDIX 20

RESPONSE TO REGULATION 14 PRE-SUBMISSION REPRESENTATIONS IN RELATION TO MATTERS RELATING TO THE SELECTION OF SITES FOR DEVELOPMENT

**Response to Regulation 14
Pre-Submission Representations in relation
to matters relating to the selection of sites
for development.**

**Barns Green
& Itchingfield**



Neighbourhood Plan

**Prepared by the Plan Steering Group
for
Itchingfield Parish Council**

March 2020

Version – 2nd Draft

Background Paper on Site Assessment and Selection

1.0 The purpose of this document, prepared in response to Regulation 14 pre-Submission representations, is to provide background information in relation to the appraisal of sites put forward for development, and to deal with comments made by consultees in relation to the selection of the two sites chosen to be developed, and to consider what, if any, changes should be made in that regard before the Plan is submitted to Horsham District Council under Regulation 15.

Background

1.1 The Steering Group, charged by the Parish Council to prepare the parish Neighbourhood Plan, began its work in September 2015.

1.2 In November 2016, following discussions in the Group and advice from DowsettMayhew, planning consultants, it was decided to launch a Call for Sites, to see whether landowners in the parish had land that they wished to develop.

1.3 In November 2016 adverts were placed in local papers, in the village magazine and by letters to developers and landowners known to the parish council to be interested in developing land in the parish. The closing date for responses was 13th January 2017.

1.4 By March 2017 a total of 29 sites had been put forward for consideration. The sites were as follows:

1. Land at Wellcross Grange, Farm Cottage and Wellcross Lodge, near Broadbridge Heath;
- 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.

1.5 DowsettMayhew gave advice on a template for the assessment of the sites to test each site's suitability for development. The template was more comprehensive than the template that HDC had put forward, but the DM template had been used by other parishes and was acceptable to HDC. A copy of the template is attached (Annex A)

1.6 The Steering Group then went about completing the factual data required to complete the template. Each Group member was tasked with obtaining particular items of data, and the various findings were entered onto each site template on Dropbox (a data-sharing software).

1.7 The job of accumulating the factual site data had been completed by June 2017.

1.8 The Group decided to invite all potential site developers to make a short presentation to the Group. 15 developers (representing sites 1, 9, 10, 11, 12, 13, 14, 15, 16, 18, 19, 21, 22, 26 and 28) chose to accept the invitation and the presentations took place on the 21st July

2017 and 31st July 2017. 4 other developers (representing sites 2A, 2A, 3, 7 and 8) chose to make written representations.

1.9 In July a further site was put forward. This was for a single dwelling in Bashurst Hill, Itchingfield.

1.10 On Saturday 20th January 2018 we organized a public exhibition of all the sites that had been put forward, held at the village school. Details of the sites were on display with, where appropriate, comments from the developer to explain the nature of the proposed development. 250 people attended and were invited to complete feedback forms giving their thoughts on each site.

1.11 After the exhibition the documents that were on show were loaded onto the Parish web site and social media posts informed parish residents that the material could be viewed.

1.12 The comments made by the exhibition visitors were analysed. 57 feedback forms or emails were received. Some residents commented on every site. Others commented only on some, or one, site. Responses to sites varied; some sites received a majority approval, some a majority rejection, and others received a mixed reception. Of the two sites eventually selected for possible development, the Old School site (Site 7) had widespread support, and for the Sumners Pond site (Site 19) views were evenly divided.

1.13 In February 2018 the Group carried out an assessment on 5 randomly-selected sites, and the results of that exercise sent to DowsettMayhew to critique. Their comments were received in March.

1.14 In April 2018 the Group held an Assessment meeting to go through the factual data templates in relation to each site, and to decide which site or sites would be suitable to provide sustainable development. The reasoning supporting the decision on each site was set out in a narrative attached to the assessment template. The outcome of that process was considered at a Group meeting in May 2018. Sites 7 and 19 were assessed as suitable for sustainable development.

1.15 There was a public meeting in June 2018, preceded by another exhibition showing details of all the sites that had been considered.

The two sites that had been chosen for potential development were announced at the meeting and feedback invited.

Selection of sites for development

1.16 The two sites that were considered suitable for development were the site at the Old School in Itchingfield (Site 7) and the site at Sumners Ponds in Barns Green (Site 19).

1.17 The result of the site assessment process was reported at a public village meeting in June 2018, preceded by a repeat of the sites exhibition (to refresh residents' memories of all the sites that had been put forward).

1.18 Following that public meeting the Group received feedback from 4 parish residents.

1.19 It was announced at the meeting that the site assessment forms would be posted on the parish website for all to see. By an oversight this was not in fact done until July 2019. The Group had received no complaint from anyone wanting to view the documents until June 2019, when it was realized that the matter had been overlooked.

Regulation 14 consultation

1.20 The consultation exercise commenced on 1st December 2019.

1.21 Notices were put in the parish magazine, in the local newspaper and on parish council notice-boards around the parish. Banners were erected in prominent positions around the parish.

1.22 The draft Plan and supporting documents were available to view on the Plan web site, and hard copies placed for inspection in the local school and in the village shop. Formal notice was given in accordance with Regulation 14 to appropriate consultees including all those who had put forward a site at the "Call for Sites" stage.

1.23 The consultation period ended on 13th December 2019. The Steering Group received 30 responses. Of these 5 were from statutory consultees including Horsham District Council, 7 from developers or landowners of potential development sites, and 18 from residents of the parish, not all of whom made specific

representations about housing site selection. 9 residents gave the Plan their support without suggesting modifications.

1.24 Only representations relating to the selection of development sites will be dealt with in this document.

Representations from Statutory Bodies

Representations from statutory bodies

West Sussex County Council

2.0 Representations submit it should be noted that parking should be in accordance with the latest WSCC Parking Standards adopted in August 2019.

Response to WSCC

2.1 Comments noted. The appropriate sections will be updated in this regard.

Horsham District Council

2.2 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?

2.3 Representations suggest that, 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.

2.4 Criterion 4. Remove 'where possible' and replace with wording such as 'justifiable' to ensure flexibility.

2.5 Representations set out support for the provision of employment at Sumners 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 to advise on 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.

Response to HDC

2.6 The development at Sumners Ponds will be near the boundary with “Little Slaughterford”. No other historic asset would be affected directly by building works. Criteria will be included to prevent contamination of land at “Little Slaughterford”.

2.7 The Plan will be amended to contain criteria for the design and construction of light industrial units at the site.

2.8 Criterion 4 is thought to be sufficiently flexible as it stands.

Changes to the Plan following Statutory Consultees’ comments

2.9 The Plan will be amended as follows:

- (a) The newer parking standards will be incorporated;
- (b) Proposals to avoid contamination of Little Slaughterford will be incorporated;
- (c) Criteria for the design and construction of industrial units on Site 19 will be incorporated.
- (d) A Windfall Development Policy is now included in the Plan;
- (e) In relation to housing numbers on the two sites selected as suitable for sustainable development, the word “around” is now used to qualify the number of units.

Representations from Developers

Representations from developers

A total of 7 developers made representations.

Gerald Eve

3.0 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.

3.1 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.

Response to Gerald Eve:

3.2 The respondent does not challenge the selection of the two sites set out in the Plan, but suggests that Sites 2a and 2b should also be developed. Those sites were considered and rejected for the reasons set out in the assessment documentation, which reasons are still valid.

Hume Planning Consultancy

3.3 It is considered that although capacity of land to the rear of Sunnycroft, Two Mile Ash Road (Site 17) 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.

3.4 Representations submit the Neighbourhood Plan must be aligned with the Horsham District Planning Framework (HDPF). It is asserted that the allocation of Sumners Pond does not reflect the aims and objectives of the HDPF.

3.5 Representations state the Sumners Pond 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.

3.6 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.

3.7 It is submitted Sumners Pond site could be fully allocated for employment to support the SME businesses in this rural area. 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.

3.8 It is submitted the site could provide for the expansion of the existing small businesses and could attract new start up businesses. Representation submits that Site 7 (the Old School site) is remote from the built up area boundary, shops and village amenities.

3.9 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.

3.10 It is submitted this site (the Old School 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.

3.11 It is submitted the NP should therefore focus on allocating housing sites close to the edge of Barns Green in place of this site

Response to Hume Planning Consultancy

3.12 The respondent is the promoter of site 17.

3.13 This site (17) was considered and rejected for the reasons set out in the assessment documentation, which reasons are still valid. The application for planning permission in relation to this site has since been rejected by HDC. Selection of this site is compliant with the HDPF.

3.14 There is no evidence that the Sumners Pond site could be economically developed for commercial use alone, and a mix of housing and light industrial use (replicating the current light industrial use of the site) is a sustainable use of the site. The placement of what would be a large industrial site in Barns Green would help to destroy the rural nature of the parish.

3.15 In relation to the Old School site, the site was chosen for the reasons set out in the site assessment documents and expanded in the Plan. Policy 4 of the HDCPL exists to cater for situations such as this. The School has been derelict for over 5 years now and a sustainable use of this deteriorating site needs to be found.

Miller Developments

3.16 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 Sumners Pond and Old School sites for new housing.

3.17 Representations state it is considered that in coming to the conclusion that Site 28 is *unsuitable for development*, 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 tenancy'

3.18 Representations also advise that the Tenant is also the owner of Sumners Pond site.

3.19 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.

3.20 With respect to the SHEELAA, 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.

3.21 Representations 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.

Representations set out

- 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.

Representations note Policy 9 of the draft Neighbourhood Plan states that providing a safe vehicular access is also an issue for the Sumners Pond site to overcome in due course.

Representations state this has not hindered its allocation as a preferred housing site in the draft Plan.

- 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.

Response to Miller Developments

3.22 The response from Miller Developments begins as follows:

“Whilst we support the Plan’s proposed allocations of Sumners Pond and the Old School site as the preferred locations of new housing in the short term, we also believe that the Plan should give consideration to

setting a vision for the longer-term small-scale expansion of the village, which would also allow for a fallback should either of the proposed allocations fail to come forward within a reasonable period.”

3.23 Site 28 is therefore put forward as a possible site for future development, should the parish seek to expand the Barns Green village further.

3.24 The position in relation to the agricultural tenancy is a factor in considering the deliverability of the site, and the tenant of the site has a view of the legal position which differs from that of the promoters of the site.

3.25 This site was considered and rejected for the reasons set out in the assessment documentation, which reasons are still valid. The existence of the tenancy was only one of the reasons for rejection of the site.

3.26 The site is in a central and highly-visible situation in the centre of Barns Green, and development of the site would greatly affect the rural nature of the village. The Plan does not select “reserve” sites for possible future development; should the need for housing in the parish exceed current expectations then all possible sites will be considered, or re-considered. The Plan contains a commitment to review the Plan after two years.

Turley for Inspired Villages

3.27 Representation confirms opposition to the Plan.

3.28 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.

3.29 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.

3.30 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.

3.31 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.

3.32 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.

3.33 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

- 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.

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.

Response to Turley

3.34 The Plan has sought to address housing needs within the parish. The Plan does not deal with the need, or otherwise, for assisted living. Reliance will be placed on the Horsham District Council’s Planning Framework in relation to this.

3.35 The respondent does not challenge the selection of the two sites set out in the Plan, but suggests that Site 1 should also be developed. This site was considered and rejected for the reasons set out in the assessment documentation, which reasons are still valid.

White and Sons

3.36 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.

3.37 Representation submit clients land Site 18 would contribute to the Parish’s housing need and provide in the region of 30 mixed dwellings.

Response to White and Sons

3.38 The issue of housing need will be dealt with in a separate document.

3.39 The respondent does not challenge the selection of the two sites set out in the Plan, but suggests that Site 18 should also be developed. This site was considered and rejected for the reasons set out in the assessment documentation, which reasons are still valid.

Hunter Developments

3.40 Support with modifications.

3.41 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.

3.42 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.

3.43 Representations advise 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.

3.44 The site at Sumners 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.

3.45 Representations confirm the agent is very pleased to see Sumners 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.

3.46 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.

3.47 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 Sumners Ponds Site as follows:

“Development proposals for a minimum of 32 residential units and 7 light industrial/commercial units, on land at Sumners Ponds shall include the following measures: [....].”

Response to Hunter Developments

3.48 The Plan states that the Sumners Pond development will deliver “around” 32 dwellings and light industrial units. The word “around” is defined in the Plan to mean “plus or minus 10%” and further states that any shortfall in housing numbers (given the indicative number of 61 dwellings supplied by HDC) will be made up by windfall developments. The Plan will now include a windfall development Policy. In those circumstances no alteration is necessary to the Plan, apart from the Windfall Policy.

Evison and Company

3.49 Representations confirm the Chichester Diocese strongly supports the proposals for the Old School site.

3.50 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.

3.51 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...”.

3.52 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 pre-empt 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.

Response to Evison and Company

3.53 Comments noted. The text will be changed as suggested.

Recommended changes to the Plan following submissions from the above developers.

3.54 Following representations from developers, the Plan will be amended to correct the inconsistency in paragraph 6.5.3 as set out in paragraph 3.5.2 above. The Plan now includes a Windfall Development Policy which deals with the issue set out at paragraph 3.48 above.

Representations from Parish Residents

Representations from parish residents

4.0 There were representations made under Regulation 14 from 18 residents for the parish, as follows.

4.1 When the Regulation 14 consultation was launched, the documentation made it clear that although the substance of individual comments would be made public, no comment would be ascribed to any individual. For that reason, in this document, the identity of those who made representations will remain anonymous.

Resident 1

4.2 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.

4.3 Representations state the 2018 SHELAA does confirm that of the two recommended sites this one (Site 16) 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.

4.4 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.

4.5 Representations submit it is considered the following sites would be a better mix for the village than the ones put forward:-

- 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.

4.6 Representations submit Section 6.3.7 states the (Sumners Pond) site is largely a Brownfield Site. It is considered this is incorrect. Representations submit the proposed housing is to be on the field which is agricultural/Greenfield.

4.7 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.

4.8 Representations state the field and general area is considered to be a bat sustenance area.

4.9 Representations advise of concerns this will just be the gateway to further development as owner and developer clearly have ambitions for greater development of the site.

4.10 Concerns raised in relation to density, mobile phone mast and parking arrangements.

4.11 Representations in relation to the Old School site 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.”

4.12 Representations submit 79% of residents said Greenfield sites should not be developed.

Response to Resident 1

4.13 The housing density on Site 16 was only one of the reasons for the planning application to be rejected; the other reasons set out in the planning Appeal decision remain valid. The suggested site would bring no advantages over the Sumners Pond site, and would be in a more prominent position within the Barns Green village. The development of the Old School site should include the former playing field and such a development, if correctly and sensitively handled, would contribute to the housing needs of the parish in a positive way.

4.14 The two selected sites were considered and accepted for the reasons set out in the assessment documentation, which reasons are still valid.

4.15 IPC agrees that the “field” portion of the Sumners Pond site does not strictly come within the accepted definition of “Brownfield” or Previously Developed Land. The National Planning Policy Framework defines Previously Developed Land as: “*Land which is or was*

occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

4.16 However it is land that has been used as part of the business of Summers Pond farm for a variety of purposes other than agriculture and is not therefore to be looked at in the same way as (for example) sites 28,27 or 17 which are still in use for sheep-grazing or crop culture. The protection of the structure and setting of “Little Slaughterford” is dealt with in the Plan, as is the maintenance of existing trees. The site selected for development is a small part of the business site of the owner and no other part of the site was put forward for development or is considered suitable for such development.

4.17 The Biodiversity Study, commissioned by the IPC, does not mention any reference to bats in this area. There is no credible scientific or medical evidence that proximity to a mobile telephone mast is hazardous to health. Housing density across the whole site is appropriate. Parking issues are dealt with elsewhere in the Plan.

4.18 In relation to the Old School site, the former playing field is in integral part of the site and has not been in agricultural use since 1888. Although it is correct to state that the playing field is not technically a “brownfield” or Previously Developed Land, it has been out of agricultural use for over 130 years and is inextricably part of the same site as the school buildings.

Resident 2

4.19 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.”

4.20 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.

4.21 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."

4.22 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.

4.23 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.

4.24 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.

4.25 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)

Response to Resident 2

4.26 Comments noted. The amendment suggested to paragraph 6.3.7 will be made. The site assessments are available online on the Neighbourhood Plan website and can be easily seen. The development of the Old School site, if correctly and sensitively handled, would contribute to the housing needs of the parish in a positive way. All residents of Itchingfield hamlet need to drive to access local facilities and would factor this into a decision about whether or not to live there.

4.27 The photos in the Plan are for illustrative purposes, not part of the justification for any particular recommendation or decision.

4.28 When residents expressed a view about redeveloping the Old School site, they did so on the basis of the proposal for developing the whole site. At the stage that views were taken, only three or four expressed a view about splitting the site..

4.29 The Neighbourhood Plan is a plan for the whole parish – to exclude Itchingfield or Bashurst Hill from consideration would be untenable.

Resident 3

4.30 Representations submit paragraph 6.2.7 should state “Barns Green and Itchingfield.” Representations query the order of event regarding the site selection process.

4.31 Representations state it is still unclear after carefully reading the site assessments why this site (Sumners Ponds) has been chosen whilst others have been discounted where they are first within the northern “arc” of the village.

4.32 Representations submit the site is not largely brownfield as stated. Representations query how does development of this site “retain existing employment opportunities.”

4.33 Representations submit that deeming the entire complex of Sumners 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.”

4.34 Representations submit there is a need to qualify within the assessment if Sumners Ponds is a recreation business or the basis from which to initiate a substantial housing development site?

4.35 Representations advise of concern that development could lead to potential development of the entire site over a number of years.

4.36 Representation advise of 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.

4.37 Representations set out support for the regeneration of the Old School site but queries where is the justification to develop the adjacent field.

4.38 Representations question 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.

4.39 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.

Response to Resident 3

4.40 Comments noted. The amendment to paragraph 6.2.7 will be made.

4.41 This document sets out how the site selection process was carried out and the criteria used, which includes an assessment of flood risk.

4.42 The “field” portion of site 19 is land that has been used as part of the business of Sumners Ponds for a variety of purposes other than agriculture. Although it does not wholly meet the definition of Previously Developed Land set out in the NPPF (see para 4.15 above) it was considered that it could and should be viewed in a different light to other fields (such as sites 8,16 and 28 for example) which are used for “pure” agricultural purposes such as sheep grazing or arable purposes.

4.43 The site proposals replicate existing light industrial businesses at the site. The site will, however, predominantly be used for housing as the Plan makes clear. It is only the designated site that is suitable for, and permitted to be, developed.

4.44 In relation to the Old School site, the former playing field is an integral part of the site and has not been in agricultural use since 1888. Although it is correct to state that the playing field is not technically a “brownfield” or Previously Developed Land, it has been out of agricultural use for over 130 years and is inextricably part of the same site as the school buildings.

4.45 Paragraph 6.5.4.2 is necessary as it is a quote from Policy 4 of the HDPF.

4.46 Sustainability has to take into account how people live in the real world. Even those who live in Barns Green need car transport, in the absence of a proper bus service.

Resident 4

4.47 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.

Response to Resident 4

4.48 Comments noted.

Resident 5

4.49 Representations state Sumners Ponds is the more suitable location for affordable housing not Itchingfield.

4.50 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.

4.51 Representations submit affordable housing needs to be in the centre of Barns Green close to amenities.

Response to Resident 5

4.52 Comments noted. The allocation of affordable housing is a matter for consideration at the planning application stage. IPC agrees that the Old School site lands itself to “better-quality” housing

Resident 6

4.53 Representations set out opposition to the building of 32 houses on the Sumners Pond Site.

4.54 Representations state it is claimed the site is mainly Brown Field and it is not!

4.55 Representations advise of concern to Little Slaughterford

4.56 Representation advise of concern re close proximity to Ancient Woodland, being outside the Village boundary and the land being in a Bat feeding area.

4.57 Representations state Chapel Road would not cope with any more traffic.

Response to Resident 6

4.58

The “field” portion of the site is land that has been used as part of the business of Sumners Pond farm for a variety of purposes other than agriculture and is not therefore to be looked at in the same way as (for example) sites 8, 16 or 28 which are still in use for sheep-grazing or crop culture.

4.59 The protection of the structure and setting of “Little Slaughterford” is dealt with in the Plan, as is the maintenance of existing trees and ancient woodlands.

4.60 The Biodiversity Study, commissioned by the IPC, does not mention any reference to bats in this area.

4.61 Traffic in Chapel Road will increase wherever more houses are sited, given the presence of the pub, shop and café.

Resident 7

4.62 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.

4.63 Representation advise the justification for site 19 includes the following considerations:

- - 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.

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.

Response to Resident 7

4.67 The site assessments were carried out according to an objective framework prepared by Planning Consultants retained by IPC. To an extent local knowledge and visual inspection was utilised to ensure that a fully-formed conclusion was achieved. Earlier in this document is set out the process followed. All of the quotations set out by the respondent are factually correct.

Resident 8

4.68 Representations submit that parking for Sumners needs addressing.

4.69 It is submitted that the school is not large enough for a potential of 50 extra houses in the village.

4.70 Representations query what is there to stop a spread of development across the whole of Sumner Ponds?

4.71 Representations advise the field is very, very wet in winter.

4.72 Representations submit the volume of houses is extreme and squashing them in is not in keeping with the village.

Response to Resident 8

4.73 Parking will be addressed at the planning application stage but is dealt with elsewhere in the Plan. Housing numbers required by HDC are not in the gift of IPC and this issue is dealt with in a separate document. No other part of the Sumners Pond site is selected for development. The issue of surface water drainage is an issue for the entire parish, and the Plan demands that the most modern and sustainable drainage techniques are to be involved. The housing density on the site is suitable.

Resident 9

4.74 Representation set out concern re visibility on busy road.

4.75 Representation set out opposition to the houses being built on the Sumners site:

- The proposed plans are not in keeping to the listed building and will effect its setting;
- The rural nature of the Sumners 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;
- Sumners side of the road is outside the village boundary.

4.76 Representation set out objection to Page 44-45 - 6.3.7 as it is considered misleading.

Response to Resident 9

4.77 The issue of entry/exit visibility will be addressed at the planning application stage. Wherever houses are built in the parish, some challenge to the rural appearance of the land will be

compromised; with Sumners Ponds the rural nature of the parish will be less than if other sites had been chosen.

The protection of the structure and setting of “Little Slaughterford” is dealt with in the Plan, as is the maintenance of existing trees. The Biodiversity Study, commissioned by the IPC, does not mention any reference to bats in this area. Without evidence about the supposed “misleading” nature of pages 44/45, no comment is possible.

Resident 10

4.78 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 Slaughterford’.

4.79 Representations submit building new houses up to the boundary fence of the listed building will destroy this special setting.

4.80 Representations consider the removal of the Northern section of this site from the proposal making the Northern boundary the existing entrance / access road to Sumners Ponds.

Response to Resident 10

4.8 IPC agrees that the “field” portion of the site does not strictly come within the accepted definition of “Brownfield” or Previously Developed Land. However it is land that has been used as part of the business of Sumners Pond farm for a variety of purposes other than agriculture and is not therefore to be looked at in the same way as (for example) sites 28,27 or 17 which are still in use for sheep-grazing or crop culture.

4.82 The protection of the structure and setting of “Little Slaughterford” is dealt with in the Plan, as is the maintenance of existing trees. Removing the field section of the site would make the site visually unbalanced, would affect the proposal for light industrial units on the site, and would make development of the whole site economically unviable.

Resident 11

4.82 Representation suggest inclusion of expected quota for affordable housing in the proposed 20 dwellings in Itchingfield.

4.83 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

Response to Resident 11

4.84 Comment noted. The amount of affordable housing will be considered at the planning application stage.

4.85 A policy as suggested in relation to tree-planting cannot be implemented before it is known whether development will occur but the IPC will have the point generally in mind for the future.

Residents 12 + 13

4.86 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.

4.87 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.

Response to Residents 12 + 13

4.88 Comments noted.

Changes to the Plan following representations from Residents

The Plan will be amended in the following ways:

- (a) Paragraph 6.2.7 will be changed to include the word “parish”;
- (b) Paragraph 6.2.7 will be changed to include the words “Barns Green and Itchingfield”;