

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

Itchingfield Neighbourhood Plan

Prepared for
Itchingfield Parish Council

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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.