



Summary of Representations made on the Regulation 16 version of the Billingshurst Neighbourhood Development Plan (BNDP)

1. This document provides a summary of the representations submitted in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 to the Billingshurst Neighbourhood Development Plan (BNDP). This document is produced in compliance with the Neighbourhood Plan (Referendum) Regulations 2012.
2. Horsham District Council (HDC) published the BNDP for consultation for 8 weeks from 17 June to 12 August 2020 in accordance with Part 5 of the Neighbourhood Planning (General) Regulations 2012. Representations were submitted during the publicity period by 40 respondents. The representations were received from statutory consultees, developers, their agents, and other organisations.
3. Set out below is a summary of the issues raised in the representations. The Horsham District Council Representation can be seen in full on our website by following this link: <https://www.horsham.gov.uk/planning/neighbourhood-planning/billingshurst>

Rep	Name/ Organisation	Date received	Method of submission	Summary of representation
<i>Statutory Representations</i>				
1	Savills obo Bellway Homes	11/08/20	Email	Made particular representations that are relevant to the Land East of Billingshurst, Little Daux. Follows representation made to Regulation 14 consultation. Sustainable greenfield site, logical extension to the village and being promoted to HDC for future development. Clear aspiration of the BNDP to support HDC in the strategic housing. There is no objection to this but should be appropriately reflected in the BNDP. This may help with future amendments to the BNDP. A lot of the BNDP may become out of date due to the Horsham District Planning Framework (HDPF). The representation goes into detail in adding commentary to different aspects of the plan. It also sets out details of the Little Daux site.
2	Barton Willmore obo Reside Developments	07/08/20	Representation form	Made a series of representations to Policy BILL 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12 (object). General comments are in relation to the BNDP relationship with the new Horsham District Local Plan Review. The BNDP needs to be clear regarding reviewing of the plan, and if that is triggered

				<p>by the Local Plan Review. Furthermore that the objectives should also reflect this. It is likely that housing requirement may increase. The representation puts forward the consideration of Design Codes guide as a supplementary document. If the Billingshurst Parish Design Statement has been reviewed in light of the design points identified in the engagement process.</p> <p>Further comments are made in regards to policies of the Plan. These are again regards to the relationship of the BNDP with the Local Plan Review. The Built up area boundary, seeking flexibility of some wording and engaging with the local community.</p> <p>The representation goes on to put forward some modifications for the areas of the plan listed above.</p>
3	Armstrong Rigg obo Dunmoore	12/08/20	Email	<p>Acting on behalf of Land north of Hilland Farm, a business area that was given permission in 2019. Client has an interest in Billingshurst and future development. Comments were made in regards to the Vision and Objectives, Spatial Strategy, Chapter 7: Economy and Chapter 8: Transport and Movement.</p> <p>Support objective in para 2.1. The representation goes on to request modification of certain vision and objectives, which was first raised at Regulation 14. In particular Objective 4. Comments were made in regards to the Spatial Strategy (Policy BILL1), and raised amendments to the text regarding the Built up area boundary. It does not include site north of Hilland Farm that has been given permission.</p> <p>Further amendments to Chapter 7: Economy were listed in the representation. In regards to use classes that came into effect in September 2020. Finally, support is expressed for Chapter 8 but with small amendments put forward for consideration.</p>
4	Turley obo Vistry Homes	12/08/20	Email	<p>Made particular representations in regards to Local Green Spaces that have been made previously to Regulation 14 consultation. Introduced a parcel of land which is also being promoted through the HDC Local Plan Review (Land at Bridgewater Farm). The proposed site is being promoted for residential development.</p> <p>Policy BILL15, representation takes note of intentions behind this policy. As previously states do not believe that the 'Bypass Path' meets NPPF tests and is 'Demonstrably Special'. Whilst it is noted that the site is used for recreation purposes. Believe that this LGS should be removed from the Plan. The representation goes on to detail the response to the Local Plan Review.</p>
5	JWPC	12/08/20	Email	<p>Making a representation for a landowner within the Neighbourhood Area that they would like see included in the BNDP as housing. The Land east of Billingshurst has been presented to HDC to be included in the Local Plan review as it is understood that the sites in the BNDP will not change. Site would present a relatively small scale extension to the ongoing development to east of</p>

				<p>Billingshurst. Could be incorporated into the wider development with little impact on the landscape.</p> <p>Would like to enter discussions with HDC and the Parish Council, as the site lies adjacent to the BUAB. Regarding BILL1 of the BNDP, we note that Policy 4 of the HDPF are not included within part B of the policy. Representation goes on to advise some small amendments to this policy wording. Fully support AIM1 of the plan. The representation also includes a map and a copy of the representation to the HDC Local Plan Review.</p>
6	CPA Property	10/08/20	Representation form	<p>Made particular representations to Paragraph 7.6 and 7.7 (support with modifications). Clients support the BNDP but have asked for this site to be specifically identified as a Key Employment Area, then rely on policy alone. In particular to extract paragraph 7.6 and possibly 7.7. The site land adjacent to McVeigh Parker and Andrews Hill. Given the current Covid-19 pandemic, this site is suitable commercial space to provide starter units. The representation goes on to outline details about the site.</p>
7	Woodland Trust	12/08/20	Representation form	<p>Made particular representation to Policy BILL 2, 4, 5 and 16. Welcome the wording in BILL2 xi to preserve the natural features such as trees and hedgerows. Increases in tree canopy cover has been identified nationally as a vital part of the climate change emergency response.</p> <p>BILL4, we welcome the policy promoting natural play including accessible woodland. The Trust has developed Woodland Acres Standard to complement Natural England accessible Natural Green Space Standard.</p> <p>BILL5 encourage the provision of natural woodland burial sites, as it can provide multiple benefits in line with the BNDP Objective 5.</p> <p>BILL16 encourage adding wording in support of natural flood management, including tree planting. The representation goes on to provide some small amendments to policy wording for BILL2, BILL4 and BILL16.</p>
8	McConnell Planning	11/08/20	Representation form	<p>Paragraph 4.7 of the BNDP states that the BUAB will be amended to reflect sites completed or with planning permission. However, the BUAB does not that in account land south of Maringdean Acres for 51 dwellings. The permission have now been implemented. The site is also allocated in the HDPF under Policy SD11. SD11 also allocates two separate parcels of land for development, one being mentioned above and the other Blackthorne Avenue. The later of the two sites has been included in the BUAB.</p>
9	Historic England	Redacted	Email	<p>Having reviewed the plan, happy to confirm that Historic England have no comments to submit on this occasion.</p>

10	Environment Agency	Redacted	Email	<p>Made particular representations to Policy BILL3: Energy Efficiency in Design and BILL5: Burial Space.</p> <p>Note BILL3 refers to ground source heat pumps, although it is a commendable aim and can be supported. The only point is that they should ideally be closed-loop systems. Loop systems do not require any input from the EA. The representation goes on to bullet point steps new development will need to follow for these systems.</p> <p>BILL5 is fully supported, in particular note to 'no adverse impacts on groundwater and surface water.'</p> <p>The representation links to further documentation on both ground source heating/cooling and burial spaces.</p>
11	West Sussex County Council	Redacted	Email	<p>Page 58 has a footnote reference that is out of date Parking Guidance. This should be updated to reflect guidance published in 2019. The footnote also does not appear to be related to any of the main text on the page. The representation links the new guidance.</p>
12	Hallam Land Management	11/08/20	Email	<p>Representing the land west of Billingshurst for approximately 450-550 dwellings. Comments reflect representation made to Regulation 14 consultation. Support the general approach that the BNDP has taken, but made particular comments to the movement routes in the Plan.</p> <p>Welcome opportunity to meet with the Parish Council to present vision of the site.</p> <p>Welcomes addition of BILL4 to the plan. HLM are committed to delivering a new country park as part of the proposed scheme. BILL12 - recognise what it is trying to achieve, particularly in regards to encouraging non-car modes of transport. Ambition of site is to create a well-connected environment. Agree with Section 9 of the BNDP, and the importance of LGS. Would appreciate if the BNDP took into account existing east to west key movement corridors across the A29.</p>
13	White Young Green obo Arunway Ltd	07/08/20	Representation form	<p>Parish should be congratulated on the impressive draft Plan. General objectives 1-6 are supported. Also support the aims (page 12), however do note that Policy BILL7 is now out of step with the classes order changes, and should be updated. The BNDP does not take the opportunity to offer explicit support for new shopping provision. Support the concept of changes to the BUAB, however this should reflect recent permissions such as South West of Platts roundabout and north of Hillands. Support aspirations of LGS, and new developments should create and provide easy access green living spaces. Support improved accessibility to neighbouring parishes. Also accept that some concepts may be looked at, at a Strategic level, and outside remit of BNDP. Should review BILL7(b) to reflect uses classes order – E.</p>

14	Southern Water	Redacted	Email	Confirm have reviewed the documentation, and pleased to note that comments made at Regulation 14 consultation have been taken into account. Have no further comments to add.
15	Network Rail	28/07/20	Email	<p>Network Rail welcome discussions with the Council around car parking at Billingshurst Station. No funding identified for this currently, with minimal land for this. Therefore, third party land would be required. Note that the barrier crossing on Station Road is identified in BNDP as an issue. Network Rail have informed HDC on potential barrier crossing issues in their Local Plan response, but could also be dealt with through BNDP.</p> <p>Level crossing safety is a top priority. Not always practical to close all level crossings, but also need to mitigate risk. Daux Footpath crossing lies in the centre of Land East of Billingshurst, also a major concern that is proposed in the Local Plan (SA118). The only way to warn footpath users of train is by the train horn. Usage of this crossing will increase if more housing is put into area. The representation goes on to expand on mitigation measures, including a map of footpath redirection.</p>
16	Waverley Borough Council	Redacted	Email	Concluded that do not wish to comment on any specific issues, for as long as any future housing allocation can be met within Billingshurst Parish, or Horsham District.
17	Natural England	07/07/20	Email	Natural England does not have any specific comments on the Billingshurst Neighbourhood Plan.
18	West Sussex County Council (Estates)	Redacted	Email	Made particular representation to Policy BILL15: Local Green Spaces. Bypass Path, Jubilee Fields and Adversane Green are allocated as LGS. They are all owned by WSCC on behalf of the Highways department and are therefore unavailable for allocation. Future highways requirement is as yet unknown. WSCC would be concerned if land became unavailable for any future improvements.
19	Surrey County Council	Redacted	Email	Have reviewed the document and do not have any comments to make.
20	Sport England	Redacted	Email	<p>Essential that plans are in conformity with NPPF paras 96 and 97. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence.</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities.</p>

21	UK Power Networks	Redacted	Email	At this stage, UPN did not foresee an impact on assets. Recommend that for future housing proposals to include provision for electric vehicles charging and electric heating. If and when connection or upgrade is needed please contact UPN.
22	Horsham District Council	10/08/20	Email	Recognise the amount of work put into this plan by the Parish Council and neighbourhood-planning group, especially during the Covid-19 pandemic. Billingshurst is identified as a small town/larger village in the settlement hierarchy in the HDPF. Expectation that all neighbourhood plans will take a share of 1,500 homes. However, since June 2019 Billingshurst had 1,250 homes either completed or under construction. HDC agree that this figure exceeds the suggestion in the Housing Needs Paper (HNP). Further, comment that the Horsham Local Plan review may increase housing numbers within Billingshurst. The main proportion of the representation makes general suggestions for amendments to policy wording. HDC thought the concept of non-policy actions were important and should kept note of.
<i>Individuals</i>				
1	Resident (Ref 1)	24/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support). Support the designated Local Green Spaces (LGS) in the plan. Maple Green Road – given that Billingshurst has had considerable housing over the past years, these spaces should be protected. Benefits to people, wildlife and children. Suggest Broomfield Drive no. 42-52 green should be included.
2	Resident (Ref 2)	13/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces. Request amendment to LGS, would like to propose parcel of land in Broomfield Drive (42-52). The land has been used for generations of children to play, as the area was built some 50 years ago. Concerns that this area could be sold for development.
3	Resident (Ref 3)	13/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support). Support designation of Maple Green Road, Local Space 13. Been used as a play space informally for 50 plus years, good for wellbeing.
4	Resident (Ref 4)	Redacted	Email	Made particular representation to Vision and Objectives, Issues with Billingshurst, Local Transport Infrastructure, Built up area boundary and Policy BILL2. In regards to the parts of the plan above, wish to amend text to reflect numerous accidents to staff and pupils around Billingshurst School. The representation also submitted a map that showed the school and surroundings with recent accidents, dangerous points. There should be traffic calming around this area (Lower East Street). To accompany the map/sketch, there are some notes from the Deputy Head of Billingshurst School.
5	Resident (Ref 5)	04/08/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support). Fully support the inclusion of all LGS' in the plan. Need to protect these spaces from future development.

6	Resident (Ref 6)	09/08/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (object). Strongly object to the sale or infilling of green spaces in Billingshurst. Open spaces are invaluable to residents, the “green lungs” of the local area. Billingshurst has rapidly grown over the past years, so these areas should be preserved. Should have green areas scattered throughout development.
7	Resident (Ref 7)	10/08/20	Representation form	Made particular representations to Vision and Objectives and Chapter 9: Environment (support). Both sections refer to LGS’ throughout the village. Amblehurst Green has been built with significant green spaces, it is imperative to development. There is a need to support LGS 13 at Maple Road. Would also like to see the inclusion of green space between 42-52 Broomfield Drive.
8	Resident (Ref 8)	10/08/20	Representation form	Much time and energy has gone into this plan. It is hard to read the whole document then make point-by-point suggestions. In the current pandemic, and no one is sure how long it will go on for and what impacts it will have. If more people are working from home, or shared working spaces. There is a shortage of water, weak infrastructure in terms of schools, medical and opportunities for arts/recreation.
9	Resident (Ref 9)	10/08/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces. Strongly support the designation of Maple Road Green as an LGS. The area has been an open, undeveloped area for about 50 years. Should remain as a green space for recreation and children to play. It is safe an attractive amenity area in its own right. New development has similar areas built throughout, so it is important existing spaces remain.
10	Resident (Ref 10)	10/08/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces. Request amendment to LGS, would like to propose parcel of land in Broomfield Drive (42-52). The land is used for children to play for many years. Concerns that this area may be sold for development.
11	Resident (Ref 11)	21/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support). Support all LGS allocations in plan. Vital for informal play space, protection of wildlife. In particular, strongly support Maple Road Green. The area outside 42-52 Broomfield Drive should also be added in as a green space in the plan.
12	Resident (Ref 12)	24/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support with modifications). Needs open spaces, especially within the housed areas for numerous reasons. Such as mental health, play/creation, wildlife. The area outside 42-52 Broomfield Drive should also be added in as a green space in the plan.
13	Resident (Ref 13)	08/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support with modifications). Strong support for BNDP 16 LGS allocations. Concerns over rate of development, with 1200 more houses consulted on. Designation of LGS is vital, as without protection may more readily be granted for development on these ‘breathing spaces’. Quality of life is worse without

				these spaces. Greater sense of mental wellbeing, biodiversity, reduced pollution as a carbon sink. Would like to see the inclusion of green space in Broomfield Drive, and would like to see it protected.
14	Resident (Ref 14)	08/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support with modifications). Support maintaining all Green Spaces in Billingshurst. They contribute to the wellbeing of residents and appeal of the area. Would like to see the inclusion of green space in Broomfield Drive, and would like to see it protected.
15	Resident (Ref 15)	08/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support with modifications). Support maintaining all Green Spaces in Billingshurst. They contribute to the wellbeing of residents and appeal of the area. Would like to see the inclusion of green space in Broomfield Drive, and would like to see it protected.
16	Resident (Ref 16)	06/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support with modifications). Support the inclusion of the green space in Maple Road. Would also like to see the inclusion of green space in Broomfield Drive. It is used by children to play on
17	Resident (Ref 17)	06/07/20	Representation form	Made particular representation to Policy BILL15: Local Green Spaces (support with modifications). Support the inclusion of the green space in Maple Road. Would also like to see the inclusion of green space in Broomfield Drive. It is used by children to play on.
18	Resident (Ref 18)	29/06/20	Representation form	Made particular representations to Page 35-36, Paragraph 6.5 A & B (support). Sons play football for youth teams. Field is ruined due to constant bad weather, causing waterlogged fields at Jubilee Fields. 4G pitches are now necessary to ensure their seasons can play no matter the weather. The Astro turf is overdue in needing to be replaced.