

**Billingshurst Parish Council**  
**Response to Horsham District Local Plan 2019-36**  
**Regulation 18 Consultation**

<b>Policy No.</b>	<b>Comments</b>
<b>1</b>	<b>Sustainable Development</b> No comment
<b>2</b>	<b>Development Hierarchy and Settlement Expansion Objection</b> See separate Billingshurst Parish Council Housing Policies objection
<b>3</b>	<b>Settlement Expansion Objection</b> See separate Billingshurst Parish Council Housing Policies objection
<b>4</b>	<b>Horsham Town</b> No comment
<b>5</b>	<b>Broadbridge Heath Quadrant</b> No comment
<b>6</b>	<b>Economic Growth</b> No comment

<b>Policy No.</b>	<b>Comments</b>
<b>7</b>	<p><b>Employment Development</b></p> <p><b>Objection</b></p> <p>The policy proposes to safeguard existing sites in Billingshurst for B1, B2 and B8 uses, being Huffwood and Eagle estates (on Brookers Road), Daux Road estate and Gillmans estate on Natts Lane as Key Employment Areas (KEA). It proposes to support alternative uses, e.g. waste management, if this supports the integrity and function as a KEA. Many Billingshurst Neighbourhood Plan consultation responses highlighted desire to have industrial estates moved from the village centre to more peripheral, more accessible sites - the current sites bring issues of personal safety and air quality due to HGV traffic passing the schools and along narrow roads, and create access/ parking issues at the railway level crossing.</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>It is suggested the policy be amended to permit change where the community actively supports change.</p> <p>The proposed policy should permit intensification of existing use; encourage small or home-working/ based businesses; reference the area for the tourism economy; aim to encourage sustainable local employment growth through Neighbourhood Development Plans; and encourage expansion of higher education facilities for R&amp;D and employment training. As above, the policy could permit change where the community actively supports change.</p>
<b>8</b>	<p><b>Rural Economic Development</b></p> <p>No comment</p>
<b>9</b>	<p><b>Conversion of Agricultural &amp; Rural Buildings to Commercial, Community and Residential Uses</b></p> <p>No comments</p>
<b>10</b>	<p><b>Equestrian Development</b></p> <p>No comment</p>

<b>Policy No.</b>	<b>Comments</b>
<b>11</b>	<b>Tourism Facilities and Visitor Accommodation</b> No comment
<b>12</b>	<b>Retail Hierarchy and Sequential Approach</b>  <b>Object</b>  <p>The adopted Local Plan states that Billingshurst has a need and scope for improved retail mix. This has not occurred. Indeed, since the adoption of the HDPF in 2015, all 3 banks and a Santander local branch have closed leaving no financial institute in the village. An estate agent, gift shop, craft and hobby shop, clothes shop, travel agent, green grocer and community craft co-operative have all closed since adoption of the HDPF in 2015. Additionally, a purpose-built supermarket building on the High Street has never been occupied. It is noted that Storrington, which has a more vibrant High Street and greater retail offer, remains a Secondary Centre.</p> <p>There is no empirical evidence which supports the reclassification of Billingshurst as a Primary Centre. The policy is not based on appropriate evidence and is therefore not justified.</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>Billingshurst must remain classified as a Secondary Centre</p>
<b>13</b>	<b>Town Centre Uses</b> No comments
<b>14</b>	<b>Housing Provision</b>  <b>Objection</b> <p>See separate Billingshurst Parish Council Housing Policies objection</p>

<b>Policy No.</b>	<b>Comments</b>
	<b>Potential Housing Allocations</b>  <b>Objection</b> See separate Billingshurst Parish Council Housing Policies objection
<b>15</b>	<b>Strategic Site Development Principles</b> No comments
<b>16</b>	<b>Affordable Housing</b> No comments
<b>17</b>	<b>Meeting Local Housing Needs</b> No comment
<b>18</b>	<b>Improving Housing Standards in the District</b> No comments
<b>19</b>	<b>Exceptions Housing Schemes</b> No comment
<b>20</b>	<b>Retirement Housing and Specialist Care</b> No comment
<b>21</b>	<b>Rural Workers' Accommodation</b> No comment
<b>22</b>	<b>Replacement Dwellings and House Extensions in the Countryside</b> No comment

<b>Policy No.</b>	<b>Comments</b>
<b>23</b>	<b>Ancillary Accommodation</b> No comment
<b>24</b>	<b>Gypsy and Traveller Accommodation</b> No comment
<b>25</b>	<b>Environmental Protection</b> No comment
<b>26</b>	<b>Air Quality</b> No comment
<b>27</b>	<p><b>The Natural Environment and Landscape Character</b></p> <p><b>Object</b> The policy does not adequately demonstrate that HDC has taken into account the UK's legally binding requirements regarding the Paris Agreement and net zero carbon by 2050.</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>With so much growth proposed for Horsham District, it should be applying this to the development of the strategy but there is no evidence of this at all.</p>
<b>28</b>	<b>Countryside Protection</b> No comment

<b>Policy No.</b>	<b>Comments</b>
<b>29</b>	<p><b>Settlement Coalescence</b></p> <p><b>Objection</b></p> <p>This policy appears to strengthen and add detail to the previous HDPF policy 27, but;</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>The policy must be clearer on what 'separation' means - it surely could not be appropriate to simply retain one or a couple of green fields between settlements (excepting where this already exists).</p>
<b>30</b>	<p><b>Protected Landscapes</b></p> <p>No comment</p>
<b>31</b>	<p><b>Green Infrastructure and Biodiversity</b></p> <p><b>Object</b></p> <p>The policy does not adequately demonstrate that HDC has taken into account the UK's legally binding requirements regarding the Paris Agreement and net zero carbon by 2050.</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>With so much growth proposed for Horsham District, HDC should be applying this to the development of the strategy but there is no evidence of this at all.</p>
<b>32</b>	<p><b>Local Greenspace</b></p> <p>No comment</p>

<b>Policy No.</b>	<b>Comments</b>
<b>33</b>	<b>Development Quality</b> No comment
<b>34</b>	<b>Development Principles</b>  <b>Objection</b>  The intention to ensure a good standard of amenity for all existing and future occupants of land and buildings of the proposed site should be expanded.  <b>How should the Reg 18 Local Plan be changed?</b>  The policy should make reference to accommodating, where reasonable, people of older years and those with disability.
<b>35</b>	<b>Heritage Assets and Managing Change within the Historic Environment</b> No comment
<b>36</b>	<b>Shop Fronts and Advertisements</b> No comment

Policy No.	Comments
37	<p data-bbox="373 342 594 375"><b>Climate Change</b></p> <p data-bbox="373 415 510 448"><b>Objection</b></p> <p data-bbox="373 488 1850 634">1. <b>Carbon reduction:</b> whilst a reduction is a step in the right direction this figure of 19% is arbitrary, there is no explanation of why it has been settled on, and does not recognise that development built under this Plan will still be standing in 2050, when the country intends to be operating at carbon neutral - developing buildings that will fail to meet a known future standard is contrary to the national aim and will make it harder to achieve the national target. .</p> <p data-bbox="373 675 1871 821">2. Climate change adaptation: limiting the policy to apply only to ‘major development’ means smaller developments, even individual unit builds, will not be required to incorporate climate change adaptations. This must be fundamentally wrong as climate change is something for all developments and everyone to make their contribution to limit, ideally reverse. Further, the policy</p> <p data-bbox="373 862 1014 894"><b>How should the Reg 18 Local Plan be changed?</b></p> <p data-bbox="373 935 1871 1114">1. <b>Carbon Reduction:</b> The policy must be strengthened in light of the recent Court of Appeal judgement on Heathrow's third runway - rather than be 'expected' to demonstrate how schemes will achieve any target they 'must' demonstrate this and the level of scrutiny must be of the highest order, thereby requiring HDC to have enough technical resource to assess proposals and the strength to refuse proposals that fail to meet the appropriate standard, which should be zero carbon emissions</p> <p data-bbox="373 1154 1850 1252">2. <b>Climate Change Adaptation:</b> The policy must apply to all development and should retain a requirement for developers to explain why adaptation and mitigation measures could not be provided. This should be extended to stating applications will be refused where it is not agreed by HDC that measures could not be provided.</p>



Policy No.	Comments
38	<p><b>Appropriate Energy Use</b></p> <p><b>Objection</b></p> <p>The policy includes a target of providing at least 10% of predicted energy requirements.</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>The policy wording and intention should be strengthened. Whilst a minimum contribution is welcome, and this should be written as 'must' rather than an expectation, and it is acknowledged Government is currently consulting on change to the Act, it is unclear why 10% has been stated. This figure appears arbitrary and with the national commitment to being carbon neutral by 2050, and that any development occurring in the life of this Plan should be standing and so using power after 2050, 10% is considered a low ambition and should be increased.</p>
39	<p><b>Sustainable Design and Construction</b></p> <p><b>Objection</b></p> <p>There are omissions compared to the current HDPF policy - 'design measures to minimise vulnerability to flooding and heatwave events' and 'designed to encourage the use of natural lighting and ventilation'. these can be considered as weakening proposals for sustainable construction</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>The omitted items should be reinstated, not least that climate change is incredibly topical and high on the Government's radar.</p>

Policy No.	Comments
40	<p><b>Flooding</b></p> <p><b>Objection</b></p> <p>With only minor adjustments against HDPF Policy 38, this Policy should be more robust</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>Developers should be asked to include Management Plans for SuDS, etc in their planning applications. There have been instances in Billingshurst Parish where SuDS have been installed and then not maintained – not only to the detriment of the development itself but to the wider area.</p>
41	<p><b>Infrastructure Provision</b></p> <p><b>Objection</b></p> <p>Developers do not provide, or cannot be forced to provide, say a new school, doctor or dentist surgery. At present they may set land aside for such facilities but no more. This can give incoming new residents an expectation that there will be, for instance, a GP surgery on their new estate. This expectation is invariably dashed and the developer reclaims the land and builds more housing on it.</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>It would be helpful at the planning stage to report if the statutory providers had any capacity to build or take on such services.</p>

<b>Policy No.</b>	<b>Comments</b>
<b>42</b>	<p><b>Sustainable Transport</b></p> <p><b>Objection</b></p> <ol style="list-style-type: none"> <li>1. Compared to the previous HDPF policy 40, the proposed policy omits the requirement for development to be appropriate and in scale with existing transport infrastructure.</li> <li>2. The policy omits the previous requirement to be located in areas providing modal transport choice.</li> </ol> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <ol style="list-style-type: none"> <li>1. this should be reinstated given the pressure on the transport network from existing users even without further pressure from new development</li> <li>2. this should be reinstated as it will be a necessary requirement if modal shift is to be achieved and result in more sustainable transport use.</li> </ol>
<b>43</b>	<p><b>Parking</b></p> <p>No comment</p>
<b>44</b>	<p><b>Gatwick Airport Safeguarded Land</b></p> <p>No comment</p>

Policy No.	Comments
<p><b>45</b></p>	<p><b>Inclusive Communities, Health and Wellbeing</b></p> <p><b>Objection</b></p> <p>It is welcomed that this policy takes a stronger line over the previous HDPF policy 42 on development as proposals ‘must take positive measures to create socially inclusive and adaptable environments to meet the long term needs of a range of occupiers and users and to ensure they are accessible to all members of the community’. The draft Billingshurst Neighbourhood Plan recognises the issue of an ageing population on housing stock and acknowledges the Lifetime Homes standard and the RTPI’s Dementia and Town Planning note (2017).</p> <p><b>How should the Reg 18 Local Plan be changed?</b></p> <p>The policy should be strengthened as it currently falls short of recognising the importance of health and wellbeing. Mental stresses, particularly, could be minimised (ideally avoided) with good planning and design of individual housing, the local environment (e.g. distance from noisy roads that impact on sleep, having local green space), and integration with existing services and environment.</p>
<p><b>46</b></p>	<p><b>Community Facilities, Leisure and Recreation</b></p> <p>No comments</p>