

Andrew Cooke
Acting Chair
Horsham Blueprint Business Neighbourhood Plan

Our ref: HBNP
Your ref: n/a

Date: 2 Nov 2020

By Email.

Dear Andrew Cooke,

Re: Representations to Horsham Blueprint Business Submission Neighbourhood Plan (Regulation 16)

Thank you for consulting Horsham District Council (HDC) on the Horsham Blueprint Submission Neighbourhood Plan (HBNP). The District Council is supportive of the Neighbourhood Forum's work to develop their Neighbourhood Development Plan. We recognise that the Neighbourhood Forum working group has undertaken a significant amount of work to reach this particular point and should be commended for all their hard work. The Council's detailed comments on particular policies are listed in the schedule attached to this letter.

We appreciate that the Horsham Blueprint Neighbourhood Planning group has been flexible whilst preparing a plan through the Covid-19 pandemic. HDC appreciate the Neighbourhood Planning Groups communication and acceptance to running a longer consultation period for Regulation 16 (8 weeks), and having a telephone service instead of a deposit location.

In addition, we wish to make the following general comments to the Submission Horsham Blueprint Neighbourhood Plan (HBNP) as part of our response:

1. Horsham Blueprint is identified as the 'unparished area' within the settlement hierarchy is identified as a Small Town and Larger Villages in the settlement hierarchy as set out in Policy 3 of the adopted Horsham District Planning Framework (HDPF). There is an expectation that emerging neighbourhood plans are required to accommodate their fair proportion of the minimum 1,500 dwellings to be delivered from Neighbourhood Plans across Horsham in accordance with Policy 15 (4). HDC agrees with the Neighbourhood Planning group's approach to housing in the Neighbourhood Plan, and appreciates the clarification on this stance within the plan.
2. There is an opportunity for a full or partial review of the Horsham Blueprint Neighbourhood Plan once the Local Plan Review has been through the legislative process and is suitably mature to provide the certainty for local groups to embark on a review of individual plans. The Local Plan Review may increase housing numbers within the Blueprint area and we will continue to keep all of our community groups and neighbourhood plans informed of the Review's progress.

If you have any further questions regarding this representation or any of the comments submitted by HDC officers, please do not hesitate to contact me or my colleagues at the

Specialist Advisory Service at the National Park.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Norman Kwan'.

Norman Kwan
Senior Neighbourhood Planning Officer.

**Horsham District Council Comments to the Submission
Horsham Blueprint Neighbourhood Plan (HBNDP)**

2 November 2020

NP Paragraph No. / Policy No.	Suggested Change / Comment
General comment	A general query is in regard to the plan period of the Neighbourhood Plan. The plan has been written in conformity with the Horsham District Planning Framework which is planned to 2031. This NDP goes to 2036, which is fine, but may need to take further consideration of the Local Plan Review. Policy 5 of the HDPF is a strategic policy specifically for Horsham Town. Throughout the HBNDP the plan has linked back to points in this policy,
1. Introduction – Paragraph 1.12-1.13	Welcome the mention of the review of the Horsham Local Plan and how the HBNP feeds into the timeline of the plan preparation.
1. Introduction – Paragraph 1.14-1.15	This section is well written and sets the scene for what work has been done to engage with the community. Figure 1.2 is also sets out a useful timeline for the HBNP preparation.
2. About the HB Neighbourhood Area	This section is a well written and concise. It shows the history of Horsham, then links through to Horsham today.
3. Vision and Objectives	Minor point, but I believe Objective 1 slightly confuses what is meant by “safeguard, conserve, protect and enhance”. It might be worth slightly re-wording/deleting a some of these words for clarity. <ul style="list-style-type: none"> • Objective 3 consider “conserve and enhance” for the wording. • Objective 4 is a little confusing when it quotes “does not put adverse pressure on the roads, publicly available car parking and other services and infrastructure.” It may be a little unobtainable.
4. Spatial Strategy	Agree with the general comments raised in the paragraphs under Chapter 4. Paragraph 4.1 comments on potential housing allocations, however this may be better caveated and reworded as; “HDC has identified potential housing allocations within the Blueprint area within its emerging Local Plan, <i>and is set to go to Regulation 19 Consultation.</i> ” Paragraph 4.10 comments on representations that were received during Regulation 14 have fed into the plans preparation. This is very much welcomed and appreciated. Appreciate the references to the SHELAA in paragraph 4.8 and Figure 4.3. A small question, is this information simply lifted from the SHELAA or is this up to date information? In regards to planning permissions etc.
Paragraph 4.10	Paragraph 4.10 notes the representation received from Historic England at Regulation 14 and the removal of the land of the Cricket Club from the Conservation Area.
Paragraph 4.13 – 4.14	Appreciate the way the plan has addressed housing and has set out what the group has in mind for future iterations of the HBNDP.
Policy HB1: Location of Development	Generally happy with the wording of Policy HB1. The policy is worded to be line with the review of the Local Plan. It may be useful to actually have a map immediately following the policy. This is not a necessity, but is sometimes useful. I understand it is listed later on in the document. I understand the meaning behind Part C, however it may be worth adding in a small section regarding viability.
5. Housing	Appreciate the initial regard to the HDPF Local Plan Policy 16. Paragraph 5.4 shows a good link between the HDPF policies and locally gathered evidence.
Policy HB2: Meeting Local Housing Needs	Generally happy with Policy HB2. Part A is in conformity with Policy 16 of the HDPF. Part C could be more explicit and mention S106 or CIL, but this is only a minor point.

6. Character, Heritage and Design	<p>Paragraph 6.3 and 6.4 note the unique character of the Blueprint area, which is comprised of Conservation Areas and Character Areas. The Map on page 23, Figure 6.1 is very useful and clearly laid out.</p> <p>We see a potential missed opportunity that section 6 ‘Character, Heritage and Design’ and section 7 ‘Horsham Town Centre’ do not mention the importance of green infrastructure / benefits of street trees etc. Urban planting and trees can have a major impact on both the character and ‘liveability’ of a town, especially with the impact of our shifting climate. It is touched on briefly in policy HB10 and with the idea of community growing spaces in HB15, but my concern is that there is no overarching theme or context around climate mitigation or resilience.</p>
Policy HB3: Character of Development	<p>Part A of this Policy could mention in the policy text, what the HBNDP would say is “avoid building design that is inappropriate to the area.” I understand it is to consider the wording mentioned before, however it would be beneficial to specifically expand on this somewhere within the Policy or policy text. Part B of the Policy is useful and sets out very clearly what the HBNDP wants to do.</p>
Policy HB4: Design of Development	<p>This is a well written policy that describes well what the HBNDP wants in terms of design. Appreciate the links to relevant documents; Horsham Town Design SPD, West Sussex Parking Standards etc. Welcome the note to the height of buildings within the Conservation Area to conserve the Local Character.</p> <p>Point xi may be hard to enforce and need more context. If there was a building that was listed, or within a Conservation Area there may be more context for enforcing a policy such as this. This may require rewording, or more context for clarity.</p>
Policy HB5: Energy Efficiency and Design	<p>This Policy is in conformity with the HDPF Policy 35: Climate Change point 2. Point 4 is important, as renewable energy can contribute toward positive Climate Change mitigation. Although the HDPF does welcome the use of solar energy and solar panels, page 121 Policy 36 mentions:</p> <p><i>“The Council will permit schemes for renewable energy (e.g. solar) where they do not have a significant adverse effect on landscape and townscape character, biodiversity, heritage or cultural assets or amenity value. Community initiatives which seek to deliver renewable and low carbon energy will be encouraged.”</i></p> <p>It may be worthwhile the HBNDP incorporating a little design requirement in terms of significant impacts on local character, biodiversity, heritage etc.</p> <p>Point viii mentions the infrastructure for electric vehicles, it could have been worthwhile to link to the WSCC Electric Vehicle Strategy (https://www.westsussex.gov.uk/roads-and-travel/travel-and-public-transport/travelwise-sustainable-transport/electric-vehicles/) from January 2020.</p>
7. Horsham Town Centre and Wider Local Economy	<p>Figure 7.1 that shows the Vision of the Town Centre is a little blurry, and the text on the legend cannot be read. For clarity it might be worthwhile reinstating this map/image.</p>
Figure 7.3	<p>Although this is extremely useful, the background mapping for this could show a little more context as to the road names etc. I can see the group has drawn over the top of the map with road names which is useful. Only a small point.</p>
Figure 7.4	<p>Useful and clear map showing retail frontages</p>
Policy HB6: Retaining and enhancing the vitality and viability of Horsham Town Centre	<p>Policy HB6 refers to retaining and enhancing the vitality and viability of Horsham Town Centre whilst maintaining a “<i>balance with residential development and infrastructure</i>”. The policy then states that they would normally support mixed-use development proposals.</p> <p>Whilst town centres will look very different in the future, there should be an emphasis on commercial and community uses that draw people into the town. The list of aspirational sites that the Plan later refers to, identifies different uses that would be supported should the sites be put forward for development. There are some sites that do focus on commercial and</p>

	<p>community uses, however several sites currently used for retail / commercial have been recommended for residential including Pets at Home and buildings along Park Street, Queen Street and Freshwater Parade.</p> <p>The Neighbourhood Plan, in particular policy HB6 and Aim 3 listing the aspirational development sites, should consider that additional residential does not really aid the weekday economy. In order to drive footfall in the town and enhance the vitality and viability of the town centre, the focus should be on commercial and community uses.</p>
Policy HB7: A welcoming Public Realm	A welcoming public realm is an important to the vitality of a retail/town centre. The HDPF notes this in point 2 b of Policy 12 and point 7 of Policy 34. Incorporating cycle parking as highlighted in point ii of the Policy, is again highlighted in the main development principles in the HDPF. Point iv could make mention of the WSCC Car Parking standards, although I appreciate it has been mentioned previously. Part C regarding Public Art is also highlighted in part 5 of the HDPF Development Principles.
Policy HB8: Horsham as a sustainable visitor destination	No comment on this policy
Policy HB9: Protecting existing and encouraging new commercial premises and land	<p>HDPF Para 4.10 notes Horsham Town as a '<i>commercial gateway to the district.</i>' Agree with the essence of Part A of the policy HB9, and the marketing requirements set out in point i to iv. This is generally in conformity with the HDPF Policy 13 and 43.</p> <p>HDC is in support of this policy and is generally in conformity with HDPF Policy 7: Economic Growth. Especially in the current Covid-19 pandemic, boosting our local economies is extremely important. Flexibility for start-up / smaller businesses is a promising idea to promote through an NDP. Only comment would be on what kind of documentation would the Neighbourhood Planning group expect to be included within a planning application to prove Point B i and ii.</p>
Aim 3: Aspirational sites	This is a useful list and aim to have in the plan and have been assessed through the Horsham Blueprint Site Assessment Final report. Welcome future communication on this.
Figure 8.1	Welcome the clarity of this map, very useful
Policy HB10: Green and Blue Infrastructure and Delivering Biodiversity net gain	<p>HDC is supportive of the inclusion of Biodiversity net gain within the BNP. Biodiversity net gain is mentioned in the update to the NPPG Natural Environment Guidance paragraph 006 in regards to multi-functioning green spaces, ecological connectivity and multifunctional sustainable drainage.</p> <p>As a minor point I don't think the word 'create' is needed necessarily in Part A as this is what is meant by enhance. Part B is generally in conformity with part B of Policy 31 in the HDPF. Part C of the Policy is taken from the Environment Bill from March 2020.</p> <p>Policies are typically worded positively, in part D of this policy, the second sentence could be deleted as what is expected is already set out in the first sentence.</p> <p>The HDPF notes 'suitable trees' whereas the HBNDP notes 'native trees', I don't see this as a conflict.</p>
Policy HB11: Local Green Spaces	<p>From what I can tell overlapping the work and Figure 8.2 map and the SHELAA I cannot see any SHELAA sites that have been allocated for LGS. HDC supports the allocated of LGS in a broad sense, as open spaces have many positive health and wellbeing effects.</p> <p>There is a strict criterion must be satisfied before formal designation and there is the potential that the proposal put forward by the local community will not meet the requirements stipulated by Paragraph 100 of the National Planning Policy Framework. A comment would to link the two LGS documents somewhere in this policy.</p>
Figure 9.1 and 9.2	Figure 9.1 shows the cycling networks and is a little blurry. The text on the legend cannot be read. For clarity it might be worthwhile reinstating this map/image. Same for Figure 9.2

<p>Policy HB12: Encouraging sustainable movement</p>	<p>HDC is in general support of this policy. It is in general conformity with HDPF Policy 33: Development Principles, in particular Point 8. Ease of movement is a key factor in the performance of the local economy, and can add to the health and wellbeing of residents and people who work in the Neighbourhood Area.</p> <p>Part D of this policy may go slightly outside the remit of the NDP, as this is the jurisdiction of the Highways Authority. However, it is good to note as an aim. Part F should be in line with the WSCC standards, that is noted previously in the policy.</p>
<p>Policy HB13: Provision of sport, leisure and recreation facilities</p>	<p>The Horsham Blueprint Neighbourhood Plan makes reference to the Horsham District Sport, Open Space and Recreation Assessment 2014 – it should be noted that a new version of this document is currently being drafted by consultants on behalf of the District Council. Other relevant documents include a Horsham District Playing Pitch Strategy and a Horsham District Council Built Sports Facility Strategy both of which were approved in 2019. On pages 60/61 of the HBNP reference is made to the aspiration to provide additional 3G artificial turf pitches across the district and this remains valid. To be of value to the community such pitches need to be floodlit which, as I understand it, will require planning approval in the case of the Millais School pitch. There will then need to be in place a formal joint community use agreement,</p>
<p>Policy HB14: Community and Cultural Facilities</p>	<p>HDC is in general support of this policy and has no further comments.</p>
<p>Policy HB15: Allotments and Community Growing Spaces</p>	<p>HDC generally supports this Policy, however it may be better suited closer to the Green Infrastructure and Green space part of the NDP. As they all interlink and relate. Or the other policies could link to this one. However Part A may need to introduce reasons that a loss of allotments would be supported, as their may be circumstances this is suitable.</p>