

Roger Potter
Bramber Parish Council
Meadow Edge
The Street
BN44 3WE

Our ref: BNP
Your ref: n/a

Date: 18 May 2020

By Email.

Dear Roger,

Re:Representations to Bramber Neighbourhood Plan Submission (Regulation 16)

Thank you for consulting Horsham District Council (HDC) on the Bramber Neighbourhood Development Plan (NDP) Submission.

Horsham District Council is supportive of the Parish Council's work to develop their NDP. We recognise that the Parish Council has undertaken a significant amount of work to reach this point and should be commended for all their hard work.

The Council's comments are from the Strategic Planning team and are listed in the schedule attached to this letter. Bramber and Upper Beeding is identified as a Larger Village 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) of the HDPF.

HDC acknowledges that the Plan will not be allocating land for development. Horsham District Council supports Bramber's position on this important issue. There will of course be an opportunity for a full or partial review of the 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 Draft Bramber Neighbourhood Plan was the subject of an informal 'healthcheck' by HDC officers in November 2019. In addition, HDC provided comments on the Pre-Submission (Reg 14) version of the Plan and is pleased to see that these have been considered and taken on board where appropriate to ensure general conformity with planning legislation.

Local Green Space

The submission Bramber Neighbourhood Plan proposes two parcels of land as potential Local Green Spaces (LGS). HDC supports the principle of Local Green Space designations. However, it is acknowledged that strict criteria 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. For information, we have provided this advice to local community groups, and have also explained that an examiner of the plan will be required to consider if the proposal designation meets the requirements set out by national planning policy and may ultimately recommend alterations or deletion of the site to ensure the plan meets the basic conditions.

COVID - 19

The COVID – 19 global pandemic is impacting on many lives across the planet. In light of severe disruption, the district council has had to review the way it operates including how it is undertaking consultations. The Regulation 16 consultation for the Shipley Neighbourhood Plan was suitably advanced when the UK government imposed strict restrictions on movements. It was decided to continue with the consultation process and extend the process to nine weeks concluding on the 11 May. The process was kept under review in light of government guidance and each consultation taken on case by case basis. Horsham District Council can confirm no communication has been received during the consultation period from any stakeholder who has expressed difficulties in viewing any documents relating to the Bramber Neighbourhood Plan.

If you have any further questions regarding this representation or any of the comments submitted by Horsham District Council officers, please do not hesitate to contact me. We acknowledge that it is within the remit of the Examiner to recommend modifications to a Neighbourhood Plan and we will welcome the opportunity to consider these should the Examiner wish to do so.

Yours sincerely,



Norman Kwan
Senior Neighbourhood Planning Officer

**Horsham District Council Reg. 16 Comments to the Submission
Bramber Neighbourhood Plan (BNP)**

May 2020

New words to be inserted are underlined. Words to be deleted will be ~~crossed through~~.

BNP Paragraph No. / Policy No.	Suggested Change / Comment
Figure 1.1	It would be useful to include in the key – a reference to the black line representing the boundary of the NP area.
Para 1.10	This requires updating as the Pre-submission – Reg. 14 – stage has now been completed.
Para 1.13	You may wish to state that a timetable can be found on the HDC website - https://www.horsham.gov.uk/planning/local-plan/local-plan-review-timetable
Para 1.14	<p>This paragraph includes an incorrect year date for the adoption of the Horsham Local Plan review – this sentence should be deleted as the correct date is stated in para 1.13. See below.</p> <p>'For Bramber, therefore, the HDPF policies remain relevant to the area situated outside the National Park, to the north of the parish. This encompasses much of the village of Bramber. The HDPF is currently being reviewed with a view to adopting a new document in 2020.'</p>
Paragraph 1.15	<p>Please take into account the comments made in HDC's health check Nov 2019. This paragraph should include the following:</p> <p><u>The National Park purposes are:</u></p> <p><u>To conserve and enhance the natural beauty, wildlife and cultural heritage of the area</u></p> <p><u>To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public</u></p> <p><u>The National Park Authority also has a duty when carrying out the purposes: To seek to foster the economic and social well-being of the local communities within the National Park</u></p> <p><u>In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes. Where there is an irreconcilable conflict between the statutory purposes, statute requires <i>The Sandford Principle</i> to be applied and the first purpose of the National Park will be given priority.</u></p> <p>The sentence – 'all new development needs to have regard to this setting and the views which would be created from the surrounding hills' – is not clear and requires redrafting to ensure the intention of the statement is clear for the reader. The revision of this paragraph should take into text in paragraph 5.37 of the South Downs Local Plan (SDLP) which refers to 'ensuring development does not harm views or landmarks, to encourage conservation and enhancement of key types and patterns and to ensure development does not detract from the visual integrity and scenic quality that are characteristic of a National Park.'</p>
Paragraph 1.16	<p>It is recommended that the table included within the Basic Conditions report (table 4.1) is included as an Appendix to the BNP and the table in paragraph 1.16 is removed. A reference can be included to refer the reader to the Appendix.</p> <p>Table Heading on page 6: 'South Downs Local Plan: Strategic Objectives Policies'</p>

Paragraph 1.22	Please update this to state that a Consultation Statement is now produced – to include the final title and date of document – and a web page link to where it can be accessed and/or where a hard copy can be read.
Paragraph 1.24	Please update the reference to early 2021 – to take into account the timetable on HDC’s webs page as referenced above under para 1.13. The date is currently December 2021.
Sustainability of the Neighbourhood Plan	Provide an update on when the Pre-submission SA was produced and consulted on – when/how comments on this were taken into account – and where the reader can find the Submission SA – include a reference to the title and date of the document and webpage links and make it clear that the SA is the Reg 16 version. Please also provide details on where the reader can locate the Screening Opinion, the Scoping Report and the Pre-Submission SA
3 Vision and Objectives – sub title	A word seems to be missing from subtitle. This should read: ‘Challenges facing <u>the</u> Parish’
Paras 4.4, 4.5, 4.6 and 4.7	Where reference is made to a HDPF /South Downs LP policy number – it would be useful to include the policy title also.
Paragraph 4.5	There appears to be a change in font typeface within the first sentence.
Paragraph 5.5	The words national park should be capitalised - <u>National Park</u> . This paragraph refers to the SDLP’s approach to housing allocated through Neighbourhood Plans, namely that Neighbourhood Planning groups can propose a higher level of development than that set out in Policy SD26 (paragraph 7.30 of the SDLP). However, caution should be used here for the BNP, as the BNP has not been set a housing provision number by the SDLP. Any housing proposed in the SDNP part of the Parish would not contribute to any housing target set by HDC. This point should be clarified in the text so the reader fully understands the situation regarding any housing allocation which may be proposed for the SDNP part of the parish in the future.
Footnote 10 on page 18	The footnote - 10 - Housing Needs Assessment, AECOM, August 2018 – has a hyperlink but doesn’t relate to a document or webpage. Could a link be provided so the reader knows where they can access the document?
Page 23	Character Area – The Street – it may be useful to note that part of this character area is also covered by the Conservation Area designation.
Paragraph 6.11	Please clarify the difference between character areas and local character areas. A short explanation of the character areas within the parish is set out in paragraph 6.3, this could usefully include further explanation of local character areas to allow the reader to better understand this section of the BNP.
Paragraph 6.12	Is this paragraph referring to the design guidelines presented in the BNP or is it referring to Building Standards or other guidelines. If the intention of the paragraph is to ensure that the reader refers to any updated design guidelines this should be made clear, as currently drafted it is not clear what this paragraph means or what it is referring to?
Policy B3	This policy usefully signposts to other relevant policies within the plan where this is appropriate, such as parking or sustainable transport policies. However, given the potential for Policy B4 to affect design it is suggested that reference to Policy B4 is also included so the reader is aware that matters relating to climate change and energy efficiency also need to be taken into account. Policy B3 (f) – reference could be made to electrical charging points for vehicles/ or refer to the provisions of Policy B4 2 (g).
Policy B4	HDC understand the importance of Policy B4 as it is reflected in the consultation statement. However, HDC considers much of the detail within the policy is dealt with under Buildings Regulations, and therefore some of the policy is unnecessary. If the policy is to remain in the BNP the following points should be considered: General As currently presented it is unclear what parts of the policy apply to which forms of development. Part 1 of the policy refers to ‘any development’, Part 2 of the policy appears to apply to all forms of development, although clause h refers to alterations to buildings. Section 3 of the policy is clearly focused on Heritage Properties and

	<p>Assets. It is recommended that the policy is redrafted to apply to new development (1), extensions and alterations (2) and heritage buildings and assets (3).</p> <p>Specific matters relating to existing policy wording:</p> <p>Section 1 - does the policy refer to <u>all</u> developments including residential extensions and outbuildings/garages? Does it also apply to Listed buildings? Clarification is required as to whether this refers to new build or extensions to existing buildings.</p> <p>Section 1 – the SDLP is not the relevant plan for the whole of BNP area and this reference should be removed. It is also not clear which part of the SDLP the policy is referring to.</p> <p>Section 1 (a) residential - please clarify what Part L refers to, is this a reference to Building Regulations Part L?</p> <p>Section 1 (a) non-residential (a) – footnote 24 should be placed after the word 'major'.</p> <p>Section 3 – wording needs refining – the statement '<i>development is done with engagement</i>' for example – is unclear.</p> <p>Footnote 21 is not clear.</p>
Policy B5	Please include a specific reference to intrinsic landscape qualities, and the highest status of protection of SDNP.
Policy B6	Please ensure that reference is made within the policy to wider landscape value, connection to and conservation and enhancement of the National Park.
Paragraph 7.8	Please include a footnote or more information on the Environment Bill.
Figure 7.1	<p>As currently drafted Policy B6 seeks to conserve, enhance and manage all green infrastructure as shown in Figure 7.1. This Figure also shows other green spaces, major footpaths as well as the priority habitats. If the policy is seeking to conserve, enhance and manage all of these then the policy wording should reflect that, by including reference to each. Does the reference to green spaces in the policy include 'other green spaces'? Does the reference to 'chains of green infrastructure' include the major footpaths?</p> <p>This policy requires all applications to contribute to the conservation and enhancement of Green Infrastructure. This is quite ambitious, and consideration should be given to whether this is realistic.</p> <p>How have the 'other green space' been identified, and is there further explanation as to why they were not considered for Local Green Spaces? Local Green Spaces proposed to be designated should be shown clearly on the map.</p>
Policy B7	NPPF Paragraphs 143-147 are all relevant to development within Greenbelt locations. Please consider if they are appropriate to reference within the policy. Alternatively, the policy could remove reference to paragraph 145 of the NPPF and rely on the current policy wording that managing development within Local Green Space should be consistent with the policy for Greenbelt locations.
Paragraph 7.20	This states Appendix D but the Policy refers to Appendix C.
Policy B9	It is recommended that the list of the 12 view locations are included within the policy.
Figure 7.4	The key refers to Policy B19 instead of B9.
Figure 8.1	<p>Please ensure the Neighbourhood Plan boundary - where it runs along the route of the River Adur - is shown on the plan. This is clear on some figures/maps and not others</p> <p>Where is the Village Centre located? There is no shading on the map to show its location.</p>
Policy B10	Criterion 1 – reference is made to residents – perhaps this can also include visitors/other people/businesses? Is it solely residents? Part 1 of the policy could be simplified as follows:

	<p>'To ensure that residents can access social, community, public transport, schools, retail and other important facilities both within Bramber and in neighbouring settlements, a All new developments should ensure safe pedestrian, and where feasible cycle, access to link up with the existing footpath and cycleway network, as defined in Figure 8.1.'</p> <p>Criterion 1 of the policy refers to the existing cycle way network, however, this is not shown on the map. If there is an existing cycle way network to which new development should be connected this needs to be shown clearly on the map and the policy map.</p> <p>Criterion 2 of the policy requires new development to improve walking and cycling, it is suggested that the policy requires improvements to walking and cycling infrastructure. The policy also refers to new linkages, however it is not clear from the map where these new linkages are. These should be added to the map so it's clear how proposals can contribute to these linkages.</p>
Figure 8.1	<p>The key shows green route roads but these aren't mentioned in the policy. Is that correct? Should the policy be referring to these routes, or seeking to protect them? Figure 8.1 refers to a Pegasus crossing but that terminology isn't used within the policy. It is suggested that the map is amended so it is absolutely clear and there is no reasonable doubt as to what the policy is trying to achieve within the neighbourhood plan area.</p>
Figures 14.2 and 14.3	<p>The key to the conservation area appears to be a plain solid brown line but on the maps it is assumed that the brown line with inward facing flags/triangles is the CA. This doesn't seem to tally with the key.</p>