

Horsham Blueprint
Neighbourhood Forum
Unit 10, MBE Horsham,
33 Queen Street,
Horsham, RH13 5AA

Sent via email:
chair@horshamblueprint.org

22 September 2020
Ref: RH/Let/P1406

Dear Sir/Madam,

RE: Horsham Blueprint Consultation – Neighbourhood Plan

Please find attached comments submitted to Horsham Blueprint on behalf of the Arun Business Consortium Ltd, Horsham Gospel Hall Trust and South Downs Education Trust, which organisations are made up of members of the Plymouth Brethren Christian Church, a faith group established in the Horsham District since the 1850s (<http://www.plymouthbrethrenchristianchurch.org/>)

The attached submission is made by the **Consortium and the associated Trusts** as representative of individual members of the Church in the area as a faith group, and also representative of:

- Several businesses within the Horsham District or nearby, the owners/employees of which are local residents who are seeking to remain with space to expand or relocate to suitable premises within the Horsham area;
- The Horsham Gospel Hall Trust a charity, which is actively seeking sites for places of worship within the District;
- The South Downs Education Trust, another charity which is actively seeking appropriate sites for independent schools within the District.

The Consortium and the associated Trusts therefore represent a wide range of needs and requirements of the Plymouth Brethren Christian Church. They also represent the Rapid Relief Team (RRT) (<http://www.rapidreliefteam.org/>) a 'not-for-profit' organisation that provides benevolent relief to local communities in times of need.

There are a significant range of requirements to be considered within Horsham Town, particularly in relation to the need to provide places of worship, independent education facilities and additional, improved employment space. There is also a need to provide for burial grounds and a care home for elderly members of the Church.

Directors

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As stated above, the Plymouth Brethren Christian Church is long established in the Horsham area. Increasing numbers of families in the District and migration from other parts of the UK to the District leads us to expect growth to continue over the Plan period. In recent years Horsham Officers and Councillors have been made aware of this situation through correspondence and meetings and detailed representations that have been made on the Core Strategy Review (October 2009), Draft Interim Statement (March 2011) and Preferred Strategy (October 2013).

The Consortium have made a considerable number of representations to Horsham District Council in relation to overall needs, and also taken part in the Examination in Public of the Horsham District Planning framework in 2015. These representations reflect many of the points raised with the District Council who have not so far in our view genuinely taken into account the requirements of faith groups within the existing development plan or various drafts of the Planning Framework. We consider that policy makers must focus more specifically on:

- The role of the voluntary sector in general and faith communities in particular in supporting the quality-of-life in the district, tackling social exclusion and inequalities including crime and fear of crime;
- The need for a clear marker in development plan preparation of the need to promote truly sustainable communities and to encourage diversity and equality in planning as reflected by the National Planning Policy Framework (NPPF);
- The need to ensure provision for the voluntary sector including faith communities and their need for space to operate, and specifically to ensure the recognition of places of worship as part of the infrastructure for sustainable communities throughout including its growth areas.

In terms of plan-making the NPPF puts sustainable development at the heart of the planning system. It refers to the three dimensions of sustainable development and defines their meaning, including at paragraph 8:

*'a **social role-** to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;'*

Section 8 of the NPPF refers to *'promoting healthy and safe communities'* and states at paragraph 92 that *'to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;’

Paragraph 31 of the NPPF refers to the use of proportionate evidence bases, requiring local authorities to ensure that:

- *‘The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.’*

In terms of school provision, the NPPF articulates the great importance that the Government attach to ensuring that a sufficient choice of school places is available for communities. It specifies at paragraph 94 that:

“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications”

We suggest that the planning policy framework across Horsham should reflect more specifically these requirements and promote vigorously a more inclusive society recognising shared values and issues but not forgetting the distinct needs of different groups. It is not satisfactory to ignore the so-called *stand-alone* providers. Reports of technical consultations nationally demonstrate that one third of faith groups do not share their premises, because they are regarded as sacred to the expression of their confession of Faith. Nevertheless, members live in harmony with their neighbours and become part of the enduring generations of families that provide stability in the community.

We consider that Horsham Blueprint should ensure the delivery and availability of a range of social infrastructure, including **places of worship**. In relation to the **need for Gospel Halls**, during the plan period it is expected that congregation numbers will increase and there is already a backlog of provision for places of worship. At present, there is a need by the Consortium and the associated Trusts for a site of 1-2ha for a principal place of worship (albeit within the wider District) and it is expected that during the plan period a further three or four small hall sites serving localities within walking distances will be needed within the Horsham area. These would require in the region of ¼ of a hectare each.

There is also a pressing need for appropriate sites for **Independent schools** in the Horsham District over the Plan period, the most pressing being the need for a new independent primary and secondary schools. To comprehensively meet needs of all age groups there is a requirement for additional **care homes** to serve the elderly residents plus suitable sites for use as **burial grounds** to serve the faith community.

In terms of **employment floorspace**, the Consortium has a keen interest in improvements and additions to the current stock of employment sites and the promotion of a business park of some 4ha-8ha for small and medium size business. During the plan period, it is anticipated that there will be a further increase in employment space requirements as other businesses from outside the area are seeking to relocate to the Horsham area should suitable premises become available.

The requirements of the Consortium in relation to appropriately sized and available **family housing** are also set out in detail in the attached submissions. It is considered that opportunities for self-build or custom build development (including residential, community or commercial) should be supported by any forthcoming plan for Horsham Town.

In summary, the Brethren community positively support the principles enunciated of sustainable development although any forthcoming policy document should provide for the following to meet the requirements of the NPPF and the established needs of the community:

- **Places of Worship.** Without them faith based communities will cease to function as a public testimony. This is a vital component in the sustainability of a faith community and the single biggest issue in this whole process;
- **Independent Schools.** Ensuring that sufficient choice of school places is available for communities is not an option, but a requirement. 'Choice' in terms of the different types of educational establishments must be part of this provision;
- **Employment Space.** The need to strengthen the role of employment generators in the local area is part of the process of creating a sustainable community. Without it, communities cannot be considered as self-sufficient or self-funding.

In conclusion, it is clear that there is a need to remove significant obstacles, within all levels of Government, which currently hinder faith based communities from fully playing their role as vital and thriving contributors to the local area.

We will be making representations on behalf of the Arun Business Consortium Ltd on the future stages of the development plan process or other appropriate development plan documents publications. It would be extremely beneficial however for trustees to meet with you to discuss their needs and requirements at the earliest opportunity.

ECE Planning

We look forward to hearing from the Horsham Blueprint group. If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely

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Director