

Nicola Wiltshire,
Shingley Parish Council
Dawtreys,
Bracken Lane,
Storrington,
RH20 3HR

Our ref: SNP/Reg 16

Your ref: n/a

Date: 11 May 2020

By Email.

Dear Nicola,

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

Thank you for consulting Horsham District Council on the Shingley Submission Neighbourhood Plan.

Horsham District Council is supportive of the Parish Council's work to develop their Neighbourhood Development Plan. We recognise that the Parish Council 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. In addition, we wish to make the following general comments to the Submission Shingley Neighbourhood Plan as part of our response.

1. Shingley Parish is a rural parish and with all settlements within the parish identified as being unclassified in accordance with the settlement hierarchy as set out in Policy 3 of the adopted Horsham District Planning Framework (HDPF). Horsham District Council acknowledges the Shingley Neighbourhood Plan is not looking to allocate sites in this submission Neighbourhood Plan.
2. It is the consideration of Horsham District Council that the Steering group have fully engaged with the relevant stakeholders to produce a neighbourhood plan supported by a robust evidence base. It is also the consideration of Horsham District Council that the plan meets the Basic Conditions and will contribute positively towards sustainable development and the improving the quality of the environment.
3. 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 Shingley 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 Shipley 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,

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

Norman Kwan
Senior Neighbourhood Planning Officer

Horsham District Council Comments to the Submission Shingley Neighbourhood Plan (SNP)

11 May 2020

NP Paragraph No. / Policy No.	Suggested Change / Comment
General	All policies need each paragraph numbered or lettered for ease of reference.
Foreword	As previously advised it is recommended consistent reference is made to the 'Horsham District Planning Framework' instead of 'HDC Planning Framework'
The development plan	As raised in response to the Reg 14 consultation and informal healthcheck, the SNP will need a full or partial review once the Local Plan review is complete and this should be acknowledged in the SNP. Recommend that para. 2.13 and 2.15 are amended in line with the latest status of the Local Plan review.
Parish Design Statement	Recommend deleting references to the Parish Design Statement as Supplementary Planning Document or SPD throughout the document (several footnotes include this reference). The PDS was previously adopted as a SPD in 2013, however the intention of the SNP is to incorporate the key findings and recommendations from the PDS into the SNP and these are presented in Appendix 2 of the Neighbourhood Plan as Design Guidance. The guidance will gain according weight through being part of the Neighbourhood Plan
Policy HD1 New Housing Development	We recommend this policy makes clear new housing development must also be in compliance with relevant policies in the Development Plan. Also, in order to make clear that all the criteria of this policy should be fulfilled for a proposal to be supported, we recommend each criterion ends with a semi colon except the penultimate one which ends with 'and' and the last criterion ends with a full stop.
Policy HD2 Housing Mix	Recommend this policy should be separated into two policies, one on housing mix and one on Rural Exception Sites (RES). We recommend that the policy on RES also requires such proposals to relate to the existing settlements in terms of location and scale. The wording of the final sentence currently does not provide clear guidance for the decision maker.
Para 4.7 & 4.8	The supporting text in these paragraphs includes criteria repeated from the Parish Design Statement (PDS) and goes on to state new development should be in line with these criteria. The criteria from the PDS is not policy and it is recommended that the criteria of Policy HD1 are referred to here instead.
Policy HD3	The intention of this policy could be made clearer by stating ' <u>All proposals for new development</u> should demonstrate,..., how the proposed scheme responds to the Shingley Parish Design Guidance'
Policy EC1 Local Green space designation	The NPPF sets out policy for managing development within an LGS, which should be consistent with policy for Green Belts. For clarity and to ensure consistency with the NPPF, it is recommended that the final sentence of EC1 is deleted.
Policy CO1 Retail, social and community facilities	Recommend the inclusion of minimum marketing requirements within the supporting text for this policy e.g.: i) Confirmation by the marketing agent on headed company paper that the premises were appropriately and extensively marketed for the required length of time as set out by the Plan ii) Dated photographs of marketing board/s of an appropriate quality, size, scale, location and number, during this time, on the premises. iii) An enquiry log, how it was followed up and why it was unsuccessful.

	<p>iv) A copy of all advertisements in the local press and trade journals (should be at least four weeks' worth of advertisements spread across a six month period).</p> <p>v) Evidence of marketing via the internet.</p>
Policy CO2 Employment	<p>We recommend this policy also makes clear such development must also be in compliance with relevant policies in the Development Plan.</p> <p>Recommend that a definition of small scale employment is included in the supporting text i.e. businesses employing less than 10 people.</p>
Policy CO3	<p>Insert 'New' in front of development</p> <p>Insert 'and amenity' after character.</p>