



Historic England

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by email only

2nd November 2020

To whom it may concern:

Horsham Blueprint Business Neighbourhood Plan Submission Version Consultation

Thank you for consulting Historic England on the submission version of the Horsham Blueprint Business Neighbourhood Plan (HBBNP) 2019-2036. Historic England's remit is for the historic environment, including promoting the conservation and enjoyment of heritage assets and the championing of good design in historic places. As such our comments are restricted to those areas of the plan that affect our interest and silence on other matters should not be taken as agreement. We hope our comments are of assistance to the examiner.

We support the Vision set out in paragraph 3.1 of the plan and we welcome the reference to the protection and enhancement of both non-designated and designated heritage assets within the neighbourhood plan area. We consider that the Vision conforms with paragraph 29 of the National Planning Policy Framework: "*Neighbourhood planning gives communities the power to develop a shared vision for their area*".

We are pleased to see that protecting the character and heritage assets of Horsham is the first Objective of the plan. This objective will guide the delivery of heritage policies included in the plan and will ensure that they are robustly justified.

We note that Horsham District Council has identified potential housing allocations within the Blueprint area within its emerging Local Plan and that an early review of the HBBNP will be required following the adoption of the Horsham District Planning Framework Review.



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We are pleased that the land of the Cricket club adjacent to the Horsham Conservation Area has been removed from the Built-up Area Boundary in response to our advice at Pre-Submission stage. This amendment recognises the land's positive contribution to the setting of the Horsham Conservation Area and conforms with Policy HB11 which designates the Sports Ground as a Local Green Space.

We strongly support Policy HB3 which aims to ensure that development proposals are appropriate to the specific characteristics of the neighbourhood area. We are pleased that bullet B.i. has been revised to reflect our previous comments and now includes specific examples of how the character of the main highway approaches into the area could be preserved or enhanced.

We welcome the reference in bullet B.ii to the Horsham Conservation Area Advice Leaflet No.4, The Horsham Town Design Statement SPD (2008), The Horsham Town Plan (2012), The Horsham Heritage and Character Assessment (2017) and Good By Design (2018) as an evidence base to the plan. We support plans that provide clear guidance to applicants and decision-makers on the requirements to respond to local character in achieving good design.

We welcome the proposed update to the list of non-designated local heritage assets set out in Aim 2. As National Planning Practice Guidance states “... *where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions*”. We recommend that the formal identification of such non-designated heritage assets is informed by testing against criteria set locally and a brief examination of each site's heritage interest in order to ensure they merit consideration in planning for their significance and to inform future decisions to sustain or enhance this significance. As previously unidentified heritage assets may be identified during the plan-making process it is proper to establish their protection through a specific policy, whilst the local planning authority give weight to the collected heritage assets as a form of ‘local list’. We would encourage the Neighbourhood Forum to include the list of non-designated local heritage assets within the policy's supporting text or as an appendix within the plan document to ensure the policy is clear and implementable.

We are pleased to support Policy HB4, bullet v. in particular.

We support Policy HB5 on sustainable design and we welcome the revision of bullet B. in accordance with our advice.



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We are disappointed that the wording of Policy HB7, bullet A. has not been revised to make the provision of public realm improvements a requirement rather than 'encouraging consideration' of potential for enhancement. In our view, the existing wording would not represent an enforceable development control policy and, as such, we would like to suggest the following amended wording:

"where development proposals would represent an opportunity to enhance the public realm in an area that has been identified as in need of improvement and the scale and nature of development, including use, expected increased pedestrian or vehicle traffic, including servicing, such enhancements will be secured either through the development or through a Section 106 agreement with the Council".

We are pleased to support Policy HB12, bullet B. as responding to the historic features of the neighbourhood plan area and the threats affecting them.

We hope these comments are of assistance to the examiner but would be pleased to answer any queries relating to them or provide further information if necessary.

Thank you again for consulting Historic England.

Yours faithfully,

[Redacted signature]

[Redacted name]

Business Officer, London & South East
Regions Group

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