

Karen Dare  
Clerk to PC  
Ashington Parish Council

Our ref: ANP  
Your ref: n/a

Date: 10 August 2020

By Email.

Dear Karen Dare,

**Re: Representations to Ashington Submission Neighbourhood Plan (Regulation 16)**

Thank you for consulting Horsham District Council (HDC) on the Ashington Submission Neighbourhood Plan. The 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.

We appreciate that the Ashington Neighbourhood Planning group has been flexible whilst preparing a plan through the Covid-19 pandemic. HDC appreciate the Neighbourhood Planning Group's 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 Ashington Neighbourhood Plan as part of our response:

1. Ashington is identified as a Medium 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 its fair proportion of the minimum 1,500 dwellings to be delivered from Neighbourhood Plans across Horsham in accordance with Policy 15 (4). Horsham District Council agrees with the quantum of housing in the Ashington Neighbourhood Plan namely a minimum of 225 dwellings allocated across two sites in line with the HDPF.
2. There is an opportunity for a full or partial review of the Ashington Neighbourhood Plan once the Horsham 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 Ashington, and we will continue to keep all of our community groups and neighbourhood plans informed of the Review's progress.
3. West Sussex County Council have updated their pupil forecasting and has informed HDC through their representations that they are seeking a 0.54Ha of land to be allocated for educational use in the Neighbourhood Plan. This is necessary to primarily ensure there is additional capacity at the existing school to accommodate growth as outlined in the emerging neighbourhood plan, but also ensure any further future growth in pupil

numbers the area has been properly planned for. The district council therefore supports WSCC's position of safeguarding land (0.54Ha) to the west of the existing school site. Horsham District Council acknowledge this has a significant impact on the emerging neighbourhood plan and we will therefore endeavour to support the Parish and Neighbourhood Plan steering group in finding a solution to the challenge this presents. As a first step, I would respectfully request ask you to contact the site promoters to make them fully aware of the updated position which they in turn will need to address. Once you had those discussions, I would be grateful if you could inform me of the outcome so I can advise of options and timescales.

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 South Downs National Park Authority.

Yours sincerely,

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

**Norman Kwan**  
**Senior Neighbourhood Planning Officer.**

Cc: Special Advisory Service (SAS - South Downs National Park)

**Horsham District Council Comments to the Submission  
Ashington Neighbourhood Plan (ANP)**

**August 2020**

NP Paragraph No. / Policy No.	Suggested Change / Comment
1. Introduction – Paragraph 1.2	Very minor comment, the acronym NPSG is used which I presume means 'Neighbourhood Plan Steering Group' but it would be helpful to use the full term before using the acronym for the reader.
1. Introduction – Paragraph 1.4	Very minor comment again, it would be better for this paragraph to be positioned closer to the map, or move the map to be underneath this paragraph.
1. Introduction – Paragraph 1.8	It could be worthwhile to mention the HDC Local Plan Review in this paragraph. We understand the ANP has been produced with the Planning Framework as the up to date development plan, but mentioning the Review sets the overall scene for the district.
1. Introduction – Paragraph 1.9	Small reference to HDPF Policy 3 Strategic Policy: Development Hierarchy (page 25) when referring to the settlement hierarchy could be helpful.
1. Introduction – Paragraph 1.10 onwards	The Consultation part of the plan could make reference to the accompanying submitted Consultation Statement within this chapter.
2. Local Context – Paragraph 2.20	Paragraph 2.20 represented the Local Infrastructure for Ashington. A comment is made in regards to the capacity of the primary school having no spare spaces. After recent discussions with Education at West Sussex County Council, it is believed that there will be capacity at the primary school for the houses allocated in this Neighbourhood Plan.
2. Local Context – Local Plan Policy	To repeat an earlier point, for clarity it could be useful to add in a section in regards to the Local Plan Review. HDC fully appreciate that this iteration of the ANP has been made in accordance of the HDPF, however the context of the Review is important to note for the future of Ashington.
3. Objectives – Paragraph 3.1 and 3.2	Agree with the connectivity of the ANP Objectives to the Challenges for Ashington.
4. Overall Spatial Strategy – paragraph 4.3	Although it does inform the process to why Ashington was given the housing figure of 123-200, and therefore allocates 225 homes. However, it could be beneficial to add more context to this section. Such as the different models, projections, overall analysis.
Policy ASH1: Overall Spatial Strategy for Ashington	HDC agree with the Built up area that can be found in the Evidence Base document on the Parish Council website - <a href="https://www.ashingtonpc.org.uk/pdf/evidence-base-ashington-buab-36-pdf.pdf">https://www.ashingtonpc.org.uk/pdf/evidence-base-ashington-buab-36-pdf.pdf</a> Part B of this policy, it would be helpful to refer to these numbers as minimums and not approximates. Part D of the policy sets criteria for development proposals outside of the built-up boundary. Earlier in the ANP it notes the majority of housing being detached, would the neighbourhood planning group consider Affordable Homes to be a good addition to this list? As rural exception sites.
5. Transport and Movement	HDC is in general support of a the ANP promoting an alternative to the use of private car. For traffic reasons, health and wellbeing of the community and climate change. Identification of these walking routes on Figure 5.1 is helpful for when using CIL money etc. If any of these footways are Public Rights of Way, these will be maintained and be the responsibility of the Highways Authority.
Policy ASH2: Increasing walking in Ashington	Part A of this policy may need re-wording, as the current wording "particular within the Neighbourhood Area" gives the impression of the policy relating to outside of the Neighbourhood Area which it cannot do. Although we appreciate some of the planning issues are contextually beyond the administrative line of the parish boundary, policies in the ANP can only be reflected within that boundary.

	As a general point for this policy, the Parish Council will need to work closely with the Highways Authority at the County Council.
Policy ASH3: Parking Provision	As a general comment, the current parking standards for Horsham District are the updated June 2020 standards from West Sussex County Council (WSCC) - <a href="https://www.westsussex.gov.uk/media/1847/guidance_parking_res_dev.pdf">https://www.westsussex.gov.uk/media/1847/guidance_parking_res_dev.pdf</a> It is understood by the ANP that the WSCC standards must be used (Part B of the policy), the ANP mentions these standards to be maximum. Part C of the policy, the ANP may want to put in such requirements as a 'transport assessment' to prove acceptable impacts on highway safety. If pathway- parking is also a highlighted issue in the parish, adequate signage may be acceptable to mention in this policy.
Spending Priority: Community Transport	After paragraph 5.12 the ANP mentions a 'Spending Priority'. This may be better articulated as a Community Aim which isn't read as a policy (as it may not be land use related) but be an important element to the Neighbourhood Area. HDC agrees that highlighting this particular priority at this stage, is a useful tool for the NDP once the plan is Made. However, it is a little confusing how the Parish Council thinks CIL money could be used. From paragraph 5.12 it sounds like the Parish would like to put money into a dial-a-ring as a business how its currently written. Further conversation with HDC officers and the CIL/S106 officer could be beneficial to see how this could work fully.
6. Environment – Paragraph 6.2	It could be worthwhile to note the one of the Scheduled Ancient Monuments is within one of the allocated sites (Policy ASH11: Land west of Ashington School).
6. Environment – Paragraph 6.3	Small point for clarification for the reader, could be beneficial to note the HDPF Policy 34: Cultural and Heritage Assets. Also to note, I think the background information that sets the scene for this policy is very useful to give a historical context to Ashington.
Policy ASH4: Local Heritage Assets	This policy is broadly in line with HDPF Policy 2: Strategic Development Point 13, and Policy 34: Cultural and Heritage Assets. It could be helpful to explain in the text what the Parish Council would deem as 'indirectly affecting local heritage assets'. This policy could also be reworded for clarity purposes, such as;  "Development proposals affecting local heritage assets, either directly or indirectly, should respect the significance of the local context, character and distinctiveness of Ashington. and context of Developments should make a positive contribution to the setting of and the Local Heritage Assets. It should be demonstrated how proposals will contribute to the conservation and enhancement of the heritage asset and its setting. In particular, the following buildings are considered to represent local heritage assets: <ul style="list-style-type: none"> <li>• The Methodist Church</li> <li>• The Old School and Old School House, Rectory Lane"</li> </ul>
Paragraph 6.16	Minor comment, could make reference to the South Downs National Park here instead of 'South Downs.'
Policy ASH5: Landscaping and Countryside Access	HDC agrees with the concept of this policy, and countryside access is important for the health and wellbeing of communities. Part A of this policy is in general conformity with HDPF Policy SD6: Landscape Buffer, Landscape Character, Biodiversity and Green Infrastructure. Part B could include wording in regards to a Landscape Assessment if development was close to the open countryside or SDNP. It is also in general conformity with HDPF Policy 25: The Natural Environment and Landscape Character point 4. HDC agree with increasing connectivity to PRoW and Bridleway networks.
Policy ASH6: Noise Impacts and Paragraph 6.18	We understand the local concern over noise generated by the A24 road and can have an impact on quality of life and health for communities. The HDPF Policy 33: Development Principles point 2, highlights the importance of development being designed to avoid unacceptable harm on nearby properties and land. We suggest that this policy could be added to, in regards to design of development that is mentioned in Paragraph 6.18 beforehand. There could be further clarity added to the last sentence "This includes both indoor and outdoor, i.e. garden, noise impacts". Currently it reads a little confusing, and further context to this sentence could be helpful.

<p>Flooding – paragraph 6.19-6.21</p>	<p>HDC appreciate that there is a localised flooding issue within Ashington, and appreciate the ANP for highlighting/seeking to mitigate this issue within the Neighbourhood Plan. It is specific issues such as these that can be looked at in detail within an NDP.</p> <p>Particularly nearer the end of paragraph 6.20, it mentions the land being under control by certain people. This is more of a comment, but just to double check that the owners of this land are happy to mentioned in the ANP in this way. Also that they are aware of the potential mitigation that the ANP discusses to do with land that they own. As it could be the case that they are not committed to the mitigation measures that the ANP has in mind.</p> <p>Paragraph 6.21 could have more context for mitigation measures, such as Sequential tests and in some examples Exception Tests.</p>
<p>Policy ASH7: Addressing flooding in Mill Lane</p>	<p>Currently as this policy is worded, it implies that any kind of development is accepted by the ANP, as long as it contributes towards the mitigation of flood risk along Mill Lane. This may be because of other policies such as Policy 1A, that minimise the 'risk' of other development. The ANP may wish to add mitigation measures to the policy itself, as these are what the Development Management officers refer to when a planning application comes into the Council, not the pre-policy text.</p>
<p>7. Community and Economy</p>	<p>As a general note for this chapter, it could be useful to put the facilities mentioned in the policy text on a map of some sort. This may not be the Policy Map if it doesn't directly refer to a policy, but could be helpful to locate certain facilities e.g. Youth club and Scout Hall.</p>
<p>Paragraph 7.11-7.13</p>	<p>Although these paragraphs directly relate to footpaths to community facilities, it could be worthwhile to reflect this in Policy ASH2: Increasing walking in Ashington. Or make reference to that policy within this text.</p>
<p>ASH8: Ashington Community Centre</p>	<p>HDC generally agree with the approach taken to community facilities within Ashington. It is a reasonable concept to keep all development within one section of the Neighbourhood Area that is in an accessible location. The only comment I would make in regards to part A, are all the community facilities within Ashington within this proposed 'Cluster?' Because the policy mentions 'improved', are any facilities outside of this cluster ideally going to be relocated here in the future? Again the only small comment on Part B, what is meant by 'secured?' I think it may be better to delete the word secured, and move B to C so the policy text is right before the table itself.</p> <p>Swap Part C so it is Part B and vice versa.</p> <p>It could also be beneficial to decide if the Parish Council would want to focus any CIL money on any of these projects.</p>
<p>Policy ASH9: Small-scale and 'Move on' employment development</p>	<p>HDC appreciates the sentiment behind this policy, as the local economy is a vitally important to medium and small villages/communities. My only comment on Part A is what is meant by 'flexible terms?' Is this for people who work from home, small businesses that aren't full time? I think it could be useful to have had some extra text to explain exactly what the ANP was referring to.</p> <p>Part D of the policy could have more explanation, such as the provision of bike storage/racks, accessibility to local footpaths/bridleways.</p>
<p>8. Site Allocations</p>	<p>HDC agree with the approach taken to the housing figures allocated in the ANP. Policy 15 in the HDPF sets out the Strategic Housing Provision in the Horsham District. This is for a provision of 16,000 homes. Part d of the policy says that at least 1500 of the aforementioned overall provision will be allocated through Neighbourhood Plans, and to be in accordance with the settlement hierarchy. Ashington Parish Council asked Navigus Planning to help with a Housing Needs Assessment to find an adequate figure for the ANP. As a side note it could have been beneficial to link to the Housing Needs Assessment.</p> <p>HDC acknowledges that the ANP group and Parish Council have made best endeavours to accommodate the housing figure requirement, and the figure is based on robust evidence, been positively prepared and meets the Basic Conditions.</p>
<p>Paragraph 8.5 and 8.6</p>	<p>HDC agree with this approach given to the landscape character of the surrounding area. HDC also acknowledge the reference to Policy M9 in relation to the Site Allocations.</p>
<p>Policy ASH10: Chanctonbury Nursery</p>	<p>HDC agree with the allocation of this site and with the associated housing number (75 dwellings). Part I of 'Housing and Design' could refer to Policy 16 Strategic</p>

	<p>Policy: Meeting Local Housing Needs in regards to requirement of affordable housing on site (35% Point 3a).</p> <p>If the site is to seek 25% older person's accommodation, is this then plus 35% affordable housing? Or is the 25% part of the 35%? This is something that could be clarified. Having some more information and context on the kind of character of the surrounding area could be helpful, (as the design of proposed dwellings is to be in keeping with this character.)</p> <p>Accessibility in terms of updating the PRow will need to be in consultation with the Highways Authority (West Sussex County Council), but HDC do agree with being able to access the development by foot safely. In the pre-policy text (paragraph 8.9), the ANP mentions that lighting will not be intrusive to surrounding properties; "Such lighting must be designed to protect the amenity of neighbouring properties." I think this text could be a good addition to the policy under Point v.</p> <p>HDC agree with the principles set out in 'Community Infrastructure and Other Principles'.</p>
Land west of Ashington School (paragraphs 8.12 – 8.19)	<p>HDC agree with the approach the ANP has taken, however it could have been beneficial to address the Archaeology work done between Regulation 14 and 16. I note that this is addressed in the policy itself, but setting the scene for when/where survey work was carried out and what evidence was found could have been summarised in this section. And/or linking to evidence of the Geophysics carried out by Historic England.</p>
Policy ASH11: Land west of Ashington School	<p>HDC agree with the allocation of this site and with the associated housing number (150 dwellings). Part I of 'Housing and Design' could refer to Policy 16 Strategic Policy: Meeting Local Housing Needs in regards to requirement of affordable housing on site (35% Point 3a). Similar to our comments for ASH10; if the site is to seek 25% older person's accommodation, is this then plus 35% affordable housing? Or is the 25% part of the 35%? Clarification on this point could be beneficial when looking at type and tenure for this site. Again, more information on what the character of the local area is like, and what the ANP expects could be helpful (types of surrounding houses, layout).</p> <p>More suitable wording for Point ix, such as "lighting must be designed to protect the amenity of neighbouring properties." Any update to the PRow will need to be in consultation with the Highways Authority.</p> <p>Part xi reads a little confusing in its current format. The wording could be revised for clarification purposes.</p> <p>Again clarification on what is meant by 'flexible terms' on point xii.</p> <p>Clarification on what the ANP considers as 'full size' football pitches in xiii. Is the group expected this pitch to be lit? For safety reasons this would be a suitable addition to the policy.</p> <p>Part xviii Mill Lane could be shown on Figure 8.2.</p> <p>Part xix (Church Farm House, St Peter and St Paul's Church), could be shown on Figure 8.2. This could also show mitigation and adequate buffers to the Scheduled Ancient Monument (and archaeological remains). It could also be useful to show the direction of the views that are to be retained.</p> <p>Part xxii Mature trees could be shown on Figure 8.2.</p>
Other Matters	<p>As a small point there is no reference to Monitoring or Reviewing in the ANP. It is our understanding that Ashington Parish Council will seek to review this iteration of the ANP once the Local Plan Review has been to examination / adopted by the Council.</p> <p>Clarification on this point could be useful.</p>