



**Horsham  
District  
Council**

██████████  
Cowfold Neighbourhood Plan Steering Group

Our ref: CNP/HDC

Your ref: N/a

Date: 25 May 2020

By Email.

██████████  
**Re: Representations to Cowfold Neighbourhood Plan Submission (Reg 16)**

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

HDC would firstly like to commend and offer its appreciation to Cowfold Parish Council and the Neighbourhood Planning Group. For continuing the Plan's preparation through the Covid-19 adversity. In light of the Covid-19 pandemic, HDC reviewed its protocol regarding the consultation process for Neighbourhood Plans. A number were published for public consultation shortly before the government imposed the nationwide lockdown, including the Regulation 16 submission consultation for Cowfold NDP.

HDC decided in order to continue to progress neighbourhood plans, we made a decision to continue with the consultation process. However, as these consultation events commenced close to the time when restrictions on movement were coming into force, it has been decided these should be extended from 6 to 9 weeks.

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. Cowfold 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 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 is allocating land for development based on the conclusions and recommendations set out within the Dowsett Mayhew Housing Report. Horsham District Council supports Cowfold's position on this important issue. However, it is important to acknowledge the ongoing work on the Local Plan Review. In this regard, the Cowfold NDP may be required to undertake a partial review should there be an uplift in the housing numbers following the Local Plan Review and that Cowfold will be required to accommodate a proportion of that uplift through the NDP. This would only need to take place 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.

HDC provided health check comments on the CNP in July 2019 and made representations to the Pre-Submission (Reg 14) version of the Plan and the Council 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 Cowfold Neighbourhood Plan proposes 13 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.

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.

Yours sincerely,



**Senior Neighbourhood Planning Officer.**

## **Horsham District Council Reg. 16 Comments to the Submission Cowfold Neighbourhood Plan (CNP)**

**25 May 2020**

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

CNP Paragraph No. / Policy No.	Suggested Change / Comment
Foreword	<p>Please insert the relevant date – ‘Under the Localism Act <u>2011</u>’</p> <p>See below - please insert the following new text after the existing statement. As it currently reads it means development should be refused irrespective of any mitigation. This is in conflict with the NPPF 2019 and the HDPF</p> <p>‘In essence, for any new developments.....should not have a measurable impact on Air Quality or Biodiversity <u>unless adequate mitigation is secured through the Planning process to compensate for such impacts.</u>’</p>
Paragraph 1.1.3	This should be reworded so it refers to the Submission Plan and not the Pre-Submission
Paragraph 1.2.4	Please include a reference to the Local Plan Review.
Section 1.3	Would it be useful, to make a reference within this section, to the submitted Consultation Statement?
Paragraph 1.3.8	This paragraph refers to the Pre-Submission Plan. Please include the date of this Plan.
Paragraph 2.2.6	Please include a reference that provides the context for the information contained within this paragraph. Where does it state that the village centre exceeds the annual mean objective for Nitrogen Dioxide?
3.3 Strategic Objectives	<p>Several of the objectives overlap and remain to be still too ‘wordy’. It is recommended that a more succinct and focussed list of Objectives would be more effective.</p> <p>‘iii. Build on local rural character by...’. The word <i>build</i> is perhaps unfortunate in this context.</p>
Chapter 4 Environment and heritage	There is no indication or statement made at the start of this Chapter heading that states it contains Policies and Aims. This might be useful to include within the introduction. In addition – it would be useful to confirm what is the status of the of the Aims within the CNP. A suggestion is that the Policy is listed first within the chapter, followed by the Aims.
Paragraph 4.2.1	It is unclear what is meant by this statement. Which deadlines is it referring to?
Paragraph 4.2.3	Where has Figure 1 come from? Is it extracted from another document? If so – please reference.
Policy 2 Green Infrastructure	<p>The policy and supporting justification refer to existing green infrastructure but no information or details on where or what constitutes existing green infrastructure is provided. In relation to the provisions within the policy, it is not clear how an applicant can assess whether their development proposals would result in the loss of existing Green Infrastructure if this is not listed or highlighted within the supporting justification and/or within the policy and/or on a policies map.</p> <p>Please provide further details or list the key areas of green infrastructure evident within the CNP area.</p>
Section 4.8 Local Green Space	Reference to the supporting evidence based document on the LGSs should be made within paragraphs 4.8.1 – 4.8.6. Reference should also be made to the advice within the NPPF with regard to development on LGSs.
Policy 3 Local Green Space	It is noted that several of the LGS area located within the Conservation Area and/or are possibly protected by policies within the CNP and/or the HPDF such as open spaces (ie Recreation Ground).

Policy 4 Conservation Area	Is the list of places and buildings outlined at ii a list of non-designated Heritage Assets? It is not clear why they are specifically listed within the policy. A robust background evidence paper justifying their inclusion within the policy will be required and referenced within the justification/supporting paragraphs.
Policy 6: Community Services and Facilities	'iii. Development proposals that bring redundant buildings back into use for the benefit of the community will be supported <u>subject to conformity with the development plan proposals.</u>
Paragraph 5.8.1	It is not clear what site CNP03, Potters is. If this is a site within the CNP – it would be useful to reference where further details can be found (ie policy number, page number etc).  There is no reference within Policy 12: Potters, CNP03 to the allotment site. It is unclear how the two policies and site interrelate.