Dear Sir/Madam

Horsham District Council Local Plan 2019-2036, Regulation 18 Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on your emerging Local Plan. We have a number of comments to make that follow on from the response sent to the Issues and Options consultation dated 25 May 2018. I attach a copy of this letter for your reference.

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park as set out in Section 62 of the Environment Act 1995. The purposes are ‘to conserve and enhance the natural beauty, wildlife and cultural heritage of the area’ and ‘to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.’

Duty to Cooperate

We support Horsham District Council’s continuing liaison with neighbouring authorities, including the SDNPA, to ensure cross-boundary strategic priorities are fully addressed. I would take the opportunity to highlight the SDNPA’s strategic cross-boundary priorities which provide a framework for these discussions:

- Conserving and enhancing the natural beauty of the area.
- Conserving and enhancing the region’s biodiversity (including green infrastructure issues).
- The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable tourism.
- Development of the local economy.
- Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

Conserving and enhancing the natural beauty of the area (SP30)

We note the references throughout the Horsham District Plan to the SDNPA as the Planning Authority for those parts of Horsham that are inside the South Downs National Park. We request that care is taken when referring to the South Downs, South Downs National Park and the South Downs National Park Authority, as in some instances the document is not consistent.
Policy 30 Protected Landscapes includes reference to the South Downs National Park and the High Weald AONB. To improve the Plan’s effectiveness, we suggest it would be clearer to separate the policy criteria within SP30 to refer separately to the High Weald AONB and the South Downs National Park. This will help make it clear where Horsham District Council are considering the landscape as the planning authority and where they are considering the impacts of proposed development in relation to Section 62 of the Environment Act, as referred to above.

Of particular importance to its wider setting is the South Downs National Park’s status as an International Dark Night Skies reserve, and we would especially request that appropriate policy criteria are included in planning policy to ensure appropriate mitigation is incorporated into new development.

**Conserving and enhancing the region’s biodiversity (including green infrastructure issues) (SP31, SP32)**

The SDNPA supports the criteria within SP31 and SP32 and would like to see reference to the SDNP within the supporting text, acknowledging the links between the Park and the Horsham Plan Area. This is particularly important where there are large or connecting areas of green infrastructure and where our joint and adjacent local communities are working on Neighbourhood Development Plans.

The SDNPA has prepared studies and strategies considering the links to areas on the edge of the SDNP boundary which may be helpful in identifying links as the Horsham District Plan preparation continues.

**The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople (Chapter 6, SP15)**

The SDNPA recognises the development pressures being experienced in Horsham District and welcomes the efforts made by Horsham to accommodate a substantial level of development. This is expected to mitigate increasing development pressure on the National Park and may go some way to reducing the worsening of housing affordability over the wider area in the long term. We also note that the sites included within the document are at an early stage of appraisal. However, the SDNPA has concerns in relation to some sites under consideration for development. We would welcome further discussions on the following sites, particularly where they will affect the setting of the South Downs National Park:

- Strategic Sites, including Land North East of Henfield (Mayfield) SA414
- Ashington SA548
- Ashington SA524
- Pulborough (combination of sites)
- Steyning SA742
- Storrington and Sullington SA639
- Upper Beeding

In general, we would like to see more recent and comprehensive assessments of landscape impacts, particularly for sites adjacent or in close proximity to the SDNP. Several sites may be more sensitive than they first appear. Further evidence is necessary to understand the capacity of the sites and the potential for harm, or indeed improvements through the proposed development.

The proximity of communities in the SDNP and the Horsham Plan Area will require careful consideration of settlement expansion and settlement boundaries with SP3. In relation to SP15
Strategic Sites, we welcome the landscape-led approach, the requirement for masterplans, the reference to employment opportunities and the minimisation of travel.

South Downs Local Plan (2019) Chapter 7 ‘Towards a Sustainable Future’ sets out the strategy for development for the National Park and incorporates chapter 7E ‘Gypsies, Travellers and Travelling Show People’. The Horsham District Council GTAA requirements are consistent with those in the South Downs Local Plan (2019). The SDNPA appreciates the importance of addressing the housing need for all the people within our community and recognised the need for cross boundary partnerships. To reflect the joint work on this issue, we would welcome a referent to the SDNPA within Chapter 3 of the Horsham District Council GTAA.

The promotion of sustainable tourism (SP11), Development of the local economy (SP6, SP7 and P8)

The SDNPA notes the support for local visitor accommodation and we would be keen to work with you to ensure links with visitor strategies for the wider SDNPA. As with other development identified within the Horsham District Local Plan Regulation 18 document, the need for local facilities in SP7 and P8 will involve communities that cross boundaries with the SDNP and there is an opportunity to work together support those communities.

Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel (Site policies and SP42)

References is made to minimising travel and maximising sustainable travel throughout the Horsham District Local Plan Regulation 18 consultation document. Where development may increase travel through the SDNP, reference should be made to the document ‘Roads in the South Downs’ in this respect. It is considered there are opportunities to provide links to the public rights of way network, via green corridors, to provide new opportunities for new and existing residents to easily access the National Park on foot, bicycle and horseback through some of the proposed site allocations.

Future working

Notwithstanding the above concerns and requested changes, we would like to again wish you well in the progression of your Local Plan. If you have any questions on the content of this letter, please do not hesitate to contact me.

Yours faithfully

Tim Slaney
Director of Planning
Tim.slaney@southdowns.gov.uk

---