

West Grinstead Neighbourhood Development Plan 2019-2031

**A report to Horsham District Council on the West
Grinstead Neighbourhood Development Plan**

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Executive Summary

- 1 I was appointed by Horsham District Council in October 2020 to carry out the independent examination of the West Grinstead Neighbourhood Development Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood plan area on 22 October 2020.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding local character. In this context it includes a series of environmental policies. It also proposes three Local Gaps and three local green spaces. It also sets out the context for the residential redevelopment of the Huffwood Trading Estate and the relocation of the existing employment uses as a non-land use Aim.
- 4 The Plan has been underpinned by community support and engagement. It is clear that all sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report I have concluded that the West Grinstead Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area.

Andrew Ashcroft
Independent Examiner
9 December 2020

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the West Grinstead Neighbourhood Development Plan 2019-2031 (the 'Plan').
- 1.2 The Plan has been submitted to Horsham District Council (HDC) by West Grinstead Parish Council in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) 2012 and its updates in 2018 and 2019. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether or not the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted plan has been designed to be distinctive in general terms, and to be complementary to the development plan in particular. It has a clear focus on safeguarding the local environment and ensuring good design standards.
- 1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the Plan area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by HDC, with the consent of the Parish Council, to conduct the examination of the Plan and to prepare this report. I am independent of both HDC and the Parish Council. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 35 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral Service.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan is submitted to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Sections 7 and 8 of this report.

Other examination matters

- 2.6 In examining the Plan I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report. I am satisfied that the submitted Plan complies with the three requirements.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the Submission Plan;
- the Basic Conditions Statement;
- the Consultation Statement (and its various appendices);
- the Sustainability Appraisal;
- the non-technical summary of the Sustainability Appraisal;
- the Habitats Regulations Assessment Screening Report;
- the Local Gaps Background Document;
- the Local Gaps Landscape Review (Lizard Landscape Design and Ecology);
- the Partridge Green Site Assessments;
- the Dial Post Site Assessments;
- the Local Green Space Background Paper;
- the Huffwood Background Paper;
- the Horsham District Landscape Capacity Assessment 2014;
- the Horsham District Landscape Capacity Assessment 2020 (Revision B);
- the representations made to the Plan;
- the Parish Council's responses to my Clarification Note (including the detailed notes from Lizard Landscape Design and Ecology and from the agent acting for the Huffwood Industrial Estate/Star Lane proposal));
- the District Council's responses to my Clarification Note;
- the adopted Horsham District Planning Framework 2015;
- The Queen (on behalf of Lochailort Investments Ltd) and Mendip District Council [2020] EWCA Civ 1259;
- the National Planning Policy Framework (2019);
- Planning Practice Guidance (March 2014 and subsequent updates); and
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 22 October 2020. I looked at its overall character and appearance and at those areas affected by the Plan in particular. I maintained the social distancing requirements that were in place at that time during the day in the neighbourhood area. The visit is covered in more detail in paragraphs 5.9 to 5.16 of this report.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I was satisfied that the Plan could be examined without the need for a public hearing. I advised HDC of this decision once I had received the responses to the Clarification Note.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 the Parish Council has prepared a Consultation Statement. This Statement sets out the mechanisms that were used to engage the community and statutory bodies in the plan-making process. It also provides specific details about the consultation process that took place on the pre-submission version of the Plan (July to September 2019).
- 4.3 The Statement is particularly helpful in the way in which it captures the key issues in a proportionate way and which is then underpinned by more detailed appendices. Section 5 is particularly effective in the way in which it identifies the main issues which were raised and assessed during the initial stages of the Plan's preparation. In the round it is a very effective response to the requirement for such a Statement.
- 4.4 The Statement sets out details of the comprehensive range of consultation events that were carried out in relation to the initial stages of the Plan. They included:
- the development of a dedicated web-page;
 - the household questionnaire (March 2014);
 - the business questionnaire (September 2014);
 - the call for sites (December 2014);
 - the public exhibition (December 2014);
 - the public consultation (May 2015);
 - the public exhibition (September 2015);
 - the second business questionnaire (October 2015);
 - the meetings with HDC;
 - the meeting with landowners of Huffwood and Star Road (November 2017);
 - the meeting with landowners of Huffwood and Star Road and HDC economic development officers (March 2018);
- 4.5 I am satisfied that the engagement process was both proportionate and robust. It sought to engage in a balanced way with local residents, statutory bodies, local businesses and potential developers. In particular, the Parish Council has engaged with relevant landowners and HDC as it developed its imaginative proposals for the Huffwood Industrial Estate/Star Lane (included in Aim 2 of the submitted Plan).
- 4.6 Section 7 of the Statement provides a summary of the comments received on the pre-submission version of the Plan. The comments are set out in detail in Table 1. The Parish Council's responses to the comments received are set out in Table 2 which identifies the principal changes that worked their way through into the submission version. This process helps to describe the evolution of the Plan.

- 4.7 It is clear that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation.
- 4.8 From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. HDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Representations Received

- 4.9 Consultation on the submitted plan was undertaken by HDC that ended on 4 September 2020. This exercise generated comments from a range of organisations as follows:

- Sport England
- Natural England
- Waverley Borough Council
- Surrey County Council
- Southern Water
- Environment Agency
- Gladman Developments Limited
- Reside Developments Limited
- West Sussex County Council
- Rydon Homes
- Henry Adams LLP
- Rural Planning Group
- Knepp Estate
- Horsham District Council
- Historic England

- 4.10 The submitted Plan also generated representations from ten local residents.
- 4.11 I have taken account of all the representations received. Where it is appropriate to do so, I refer to particular representations in my assessment of the policies in Section 7 of this report.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area consists of the parish of West Grinstead. Its population in 2011 was 3054 persons living in 1260 houses. It was designated as a neighbourhood area on 31 October 2013. The neighbourhood area is irregular in shape and is located to the south of Horsham. The A272 runs through its northern part and the A24 runs through its western part. The River Adur is located at the southern edge of West Grinstead and to the west of Partridge Green.
- 5.2 The principal settlement in the neighbourhood area is Partridge Green. It is located off the B2135. It includes a range of retail, commercial and community facilities on and around High Street. It also includes a vibrant range of employment use in the Huffwood Industrial Estate and the Star Road Industrial Estate. It enjoys excellent pedestrian and cycling access to the South Downs Link which uses the alignment of the former railway line.
- 5.3 The remainder of the neighbourhood area is predominantly rural in character and much of its area is in agricultural use. The other settlements in the neighbourhood area are West Grinstead, Littleworth, Jolesfield and Dial Post.

Development Plan Context

- 5.4 The development plan covering the neighbourhood plan area is the Horsham District Planning Framework (HDPF). The HDPF was adopted in 2015 and covers the period up to 2031. It sets out to bring forward new growth that is proportionate to the size of the various settlements in the District. Policy 2 (Strategic Development) focuses development in and around Horsham itself together with other strategic development in Southwater and Billingshurst. Elsewhere it proposes an appropriate scale of development which would retain the overall settlement pattern in the District. Policy 3 establishes a settlement hierarchy. Within this context Partridge Green is identified as a Medium Village (the third category in the hierarchy). All of the other settlements in the neighbourhood area fall into the 'unclassified settlements' category in the hierarchy.
- 5.5 Policy 4 of the HDPF supports the expansion of settlements subject to various criteria being met. Policy 15 (Housing Provision) sets the scene for the strategic delivery of new housing. Beyond Horsham, Southwater and Billingshurst it identifies that 1500 homes should be delivered collectively across the District through neighbourhood plans in accordance with the settlement hierarchy.
- 5.6 In addition to the policies set out above the following policies in the HDPF have been particularly important in influencing and underpinning the various policies in the submitted Plan:

Policy 7 Economic Development

Policy 9	Employment Development
Policy 17	Meeting Local Housing Needs
Policy 26	Countryside Protection
Policy 27	Settlement Coalescence
Policy 32	Quality of New Development
Policy 43	Community Facilities, Leisure and Recreation

- 5.7 HDC is now well-advanced in terms of its preparation of a new Local Plan. A draft Regulation 18 Local Plan was published for consultation between February and March 2020. It is anticipated that the Plan will be submitted for examination in the latter part of 2021. In process terms this Plan is not at a stage at which it can have any significance in the examination of the submitted neighbourhood plan. Nevertheless, HDC has helpfully provided advice to qualifying bodies on how it anticipates that the emerging Plan will have a bearing on the well-developed neighbourhood planning agenda in the District. The submitted Plan has been prepared within this context.
- 5.8 The submitted Plan has been prepared correctly and properly within this current adopted development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents in the District. This is good practice and reflects key elements in Planning Practice Guidance on this matter. It is also clear that the submitted Plan adds value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

Unaccompanied Visit

- 5.9 I visited the neighbourhood area on 22 October 2020. I was fortunate in selecting a warm and sunny Autumnal day. I maintained appropriate social distancing measures in force at that time when I was in the neighbourhood area. I drove into the neighbourhood area along the A24 from the north. This gave me an initial impression of its setting and character in general terms. It also highlighted its connection to the strategic road system and to Horsham to the north and east.
- 5.10 I looked initially at Dial Post. I saw the linear arrangement of the village along the Worthing Road. I saw the village hall, and the impressive Dial Post House. I saw the nature and the significance of the village green local green space.
- 5.11 Thereafter I drove to Partridge Green via the B2135. In doing so I saw the relationship between Littleworth and Partridge Green.
- 5.12 I looked initially at the Partridge Green village centre. I saw the interesting and attractive range of retail and commercial facilities. I saw the way in which the retail units were arranged in specific groups along High Street. I also saw the Fire Station, the Village Hall and the Oakleigh GP surgery.
- 5.13 I then look at the Huffwood Trading Estate. I saw the variety of industrial and commercial units. I saw several cyclists taking advantage of the fine weather and the

facilities at The Bike Side. I then walked along High Street to the east to Littleworth Lane and walked up to the Primary School. I saw its importance in the wider community. I then walked down the B2135 to the Star Road industrial area. I saw that it included larger industrial units than those on the Huffwood Trading Estate.

- 5.14 I then looked in detail at the three Local Gaps as proposed in the Plan. Where possible I used public footpaths to look at the Gaps other than from the local highways network. This included walking along the Downs Link to the west of the proposed Local Gap 3. I saw that the former railway embankment become more significant as I walked to the north.
- 5.15 Throughout the visit to Partridge Green and Littleworth I looked at the proposed local green spaces in the Plan. I also looked at the four sites promoted as potential housing allocations by landowners and developers in their different representations.
- 5.16 I finished my visit by driving to the south of Partridge Green along the B2135. I saw the way in which this part of the neighbourhood area formed part of the wider hinterland of Partridge Green.

6 The Neighbourhood Plan and the Basic Conditions

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented, comprehensive and informative document. The wider Statement is also proportionate to the Plan itself.

6.2 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (7).

6.3 I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in 2019. This approach is reflected in the submitted Basic Conditions Statement.

6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are of particular relevance to the West Grinstead Neighbourhood Plan:

- a plan-led system– in this case the relationship between the neighbourhood plan and the adopted Horsham District Planning Framework;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development, which is identified as a

golden thread running through the planning system. Paragraph 16 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.7 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a vision for the future of the neighbourhood area. In particular, it includes a series of policies to safeguard and enhance its character and appearance in general, and the relationship between the various settlements in particular. In addition, it proposes the designation of local green spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraphs 17 and 154). This was reinforced with the publication of Planning Practice Guidance in March 2014. Its paragraph 41 (41-041-20140306) indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise and supported by appropriate evidence.
- 6.10 As submitted the Plan does not fully accord with this range of practical issues. The majority of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social and environmental. It is clear that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension the Plan includes policies for retail and employment development (Policies 7 and 8/9 respectively). In the social role, it includes policies on community facilities (Policy 5) and local green spaces (Policy 3). In the environmental dimension the Plan positively seeks to protect its natural, built and historic environment. It has specific policies on Local Gaps (Policy 1), on green infrastructure (Policy 4) and on open spaces (Policy 2). The Parish Council has undertaken its own assessment of this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.12 I have already commented in detail on the development plan context in Horsham District in paragraphs 5.4 to 5.8 of this report.
- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Subject to the incorporation of the recommended modifications in this report I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

European Legislation and Habitat Regulations - Sustainability Appraisal/SEA

- 6.14 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In this wider context the Parish Council decided to prepare a Sustainability Appraisal (SA). The Appraisal incorporates Strategic Environmental Assessment (SEA). The Appraisal (March 2020) was included in the package of submission documents. The Plan comments that the purpose of the Appraisal is to determine the sustainability criteria against which the West Grinstead Neighbourhood Plan should be assessed, to ensure that it contributes to the achievement of sustainable development.
- 6.16 The SA sets out an appraisal of the policy options against the Sustainability Framework. It notes that in preparing the submitted Plan a range of policy areas and aims were considered, and a range of options for each policy and Aim were identified and considered.
- 6.17 The SA comments about the relationship between the Plan policies and the Sustainability Framework in a very comprehensive way. It also looks at different options to the various policies.
- 6.18 In general terms I am satisfied that the work undertaken is in accordance with the Government's Practical Guide to the Strategic Environmental Assessment (SEA) Directive. The SA has assessed appropriate alternatives to the submitted approach. In doing so it carried out an assessment of the suitability of eight identified sites as potential housing developments. In the round it has assessed a Plan prepared within the context of the agreement which has been reached between HDC and the Parish Council on the way in which the emerging neighbourhood plan would relate to the emerging Local Plan.
- 6.19 The Plan includes a non-land use Aim to secure the redevelopment of parts of the Huffwood Industrial Estate for residential purposes. The matter is addressed in the SA. This approach has attracted representations from the development industry. In general terms I am satisfied that the approach that has been pursued is appropriate. In particular the matter of the potential redevelopment of the Huffwood Industrial Estate is identified as a non-land use Aspiration in the Plan which would not form part of the development plan if the Plan was 'made'. I address the strategic approach of the Plan

in paragraphs 7.15 to 7.31 of this report. I make specific comments on the Huffwood proposal in paragraphs 7.110 to 7.113.

European Legislation and Habitat Regulations - Habitats Regulations Assessment

- 6.20 HDC prepared a Habitats Regulations Assessment (HRA) of the Plan (November 2020). It concludes that the Plan is not likely to have significant environmental effects on a European nature conservation site or undermine their conservation objectives alone or in combination taking account of the precautionary principle. As such Appropriate Assessment is not required.
- 6.21 The HRA report is both thorough and comprehensive. It takes appropriate account of the significance of European sites which were assessed as part of the preparation of the HDPF. In particular it assesses the extent to which the policies in the submitted Plan would have any direct or indirect impacts on the Arun Valley SAC/SPA/RAMSAR, the Mens SAC or the Ashdown Forest SAC that cannot be avoided by the application of the policies in the HDPF. It provides assurance to all concerned that the submitted Plan takes appropriate account of important ecological and biodiversity matters.
- 6.22 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of European obligations.
- 6.23 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On the basis of all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.24 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. In particular, it makes a series of recommended modifications to ensure that they have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text and the Aims of the Plan.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and the Parish Council have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (Section 41-004-20190509) which indicates that neighbourhood plans must address the development and use of land. The Plan also includes a series of Aims. They are appropriately distinguished from the principal land use policies by colour-coding.
- 7.5 I have addressed the policies in the order that they appear in the submitted plan. Where necessary I have identified the inter-relationships between the policies. The Aims are addressed after the policies.
- 7.6 For clarity this section of the report comments on all policies whether or not I have recommended modifications in order to ensure that the Plan meets the basic conditions.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial section of the Plan (Sections 1-3)

- 7.8 These initial parts of the Plan set the scene for the range of policies. They do so in a proportionate way. The Plan highlights the links between the Plan's objectives and its resultant policies.
- 7.9 The Introduction provides helpful information about the context of the Plan. It identifies the Plan period, when the neighbourhood area was designated and the neighbourhood area itself (Figure 1). The Basic Conditions Statement and the front cover of the Plan identify the Plan period as 2019 to 2031. Paragraph 1.2 identifies the start date as 2014. Plainly this reflects the historic progression of the Plan. However, for consistency purposes I recommend that paragraph 1.2 is modified so that the Plan period information is both consistent and accurate.

In paragraph 1.2 replace '2014' with '2019'

- 7.10 The Introduction goes on to describe the planning policy context within which the Plan has been prepared and how the wider community has been engaged. The Plan Preparation part of the Introduction overlaps with the Consultation Statement. The

Introduction helpfully comments about the relationship between its development and that of the emerging Horsham Local Plan. Overall, it is an effective introduction to a neighbourhood plan.

7.11 Section 2 comments about the neighbourhood area and a range of matters which have influenced the preparation of the Plan. In particular it addresses the following matters:

- Environment and Heritage;
- Community Infrastructure;
- Economy;
- Housing; and
- Transport

A key strength of the Plan is the way in which the issues in Sections 2 filter into the Plan's policies.

7.12 Section 3 comments about the Plan's Vision and Objectives. It is well-constructed. There are six strategic Objectives of the Plan.

7.13 I comment on the strategic approach of the Plan as captured in the Parish Council's approach to the development of the Huffwood Trading Estate for residential development (as set out in Aim 2 of the Plan and the submitted SA) in paragraphs 7.15 to 7.31 of this report.

7.14 Thereafter the remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

The strategic approach in the Plan and its relationship with the submitted SA

7.15 The strategic objective of the Plan is neatly captured in paragraph 1.21. Following detailed discussions with HDC the Parish Council agreed to progress a neighbourhood plan which does not allocate sites for residential development. However, Aim 2 supports residential development on land at Huffwood Trading Estate together with the relocation of the existing commercial activities to land south of Star Road. In addition, the Aim sets out support for the relocation of commercial land uses in the area known as north of Star Road. The intended approach is set out in further detail in Section 6 of the Plan.

7.16 This approach follows on from public feedback at exhibitions. It also reflects the Parish Council's intention to make the best use of previously-developed land in a sustainable location for future housing development

7.17 The landowners of Huffwood and land to the south of Star Road were approached by the Parish Council/neighbourhood plan working group as part of the preparation of the Plan. Both landowners have confirmed support for such an approach. A Memorandum of Understanding was agreed. This confirmed the intent to work together and support the Plan's Aim. In principle the broader package has been developed to ensure there is no net loss in the overall provision of employment floor space in the Parish.

- 7.18 The submitted Plan envisages that a scheme for the redevelopment of the Huffwood Industrial Estate could accommodate around 40 residential units and provide an appropriate mix of housing to include affordable housing in line with local planning policy.
- 7.19 The approach taken is reflected in the submitted SA. Its Appendix 1 includes an appraisal of Aim 2: Land north and south of Star Road. The Appraisal sets out two options:
- Option A: To have a ‘Community Aim’ to support the relocation of commercial land use from land north of Star Road to Land south of Star Road, enabling residential redevelopment of Huffwood.
 - Option B: To not have a ‘Community Aim’ and rely on the National Planning Policy Framework and policies of the Horsham District Planning Framework.
- 7.20 Paragraph 5.16 of the SA sets out the outcome of this analysis as follows:
- ‘The Appraisal confirms Option A supports the relocation of commercial floorspace on currently undeveloped land to the south and east of the current commercial land uses, to, in turn, enable residential redevelopment of the existing Huffwood Industrial Estate. Integral to this option is ensuring no net loss of employment floorspace. This together with the likely delivery of enhanced quality new employment floorspace scores positively on the relevant economic objectives. Relocation of commercial traffic away from the High Street would be likely to positively impact highway safety, and together with the proximity of new residential development to the key services and facilities of the village would score positively relevant objectives. The delivery of new housing would also score positively’*
- 7.21 In its response to the clarification note the Parish Council provided an update on the matter. It included a detailed response from the lead consultant on the matter. It advises as follows:
- about progress on the development of baseline studies for a planning application;
 - about progress on transport assessment work;
 - provides an update on progress on the commercial mix and viability issues; and
 - comments that the anticipated timetable for a planning application is early 2021.
- 7.22 The development of the submitted Plan reflects the arrangements which HDC helpfully and strategically put in place in March 2019 with qualifying bodies which were at an advanced stage in the preparation of their neighbourhood plans. Those arrangements had two important purposes. The first was to take account of the publication of the NPPF in 2019. The second sought to ensure a strategic relationship between the parallel emergence of several neighbourhood plans and the emerging Horsham Local Plan. Whilst there were different options based on the state of progress of the neighbourhood plans concerned, for the more advanced plans (including that for West Grinstead) the options were as follows:

- to commence an early review of the neighbourhood plan to take account of any revised housing numbers which are allocated to the parish in the Local Plan.
- retain the existing neighbourhood plan, but decide not to review it. In these circumstances Horsham District Council would lead the allocation of any sites in the parish to meet any revised housing numbers arising from the Local Plan, whilst consulting with the community.
- Horsham District Council meets housing needs through the local plan process as set out in the second option. On adoption of the Local Plan, the neighbourhood plan could still be reviewed to update on any policy issues considered to be relevant to the parish (such as design or local greenspaces). The parish could also choose to allocate additional housing sites to those identified in the Local Plan if it wishes to do so.

7.23 West Grinstead Parish Council selected the first of the three options. The wider outcome of the Plan (and its associated SA) reflects the basis on which HDC and the Parish Council agreed that the Plan should proceed. As the Plan describes it does not allocate sites but includes a strategic approach for residential sites and site allocations which will be incorporated into the Plan at a future point. In addition, the Parish Council has committed to a review of the neighbourhood plan following the adoption of the new Local Plan which, at the time of its preparation and submission, was anticipated to be adopted in 2021. As part of the review the Parish Council committed to facilitate and support a level of development appropriate to the settlement hierarchy, as designated in the Local Plan.

7.24 Plainly progress is being made on the potential delivery of the wider Huffwood/Star Road package. It is an exciting and ambitious emerging proposal which is being developed in a collaborative fashion. It has regards to national planning policy. In particular it presents a significant opportunity to reinforce the attractiveness and vibrancy of Partridge Green village centre and to reduce the levels of commercial traffic in High Street.

7.25 Plainly it is a complicated matter. The delivery of the package is not yet assured. In any event the emerging package is included as a community aim rather than as a land use policy. In these circumstances the approach is not associated with the evidence and information that is traditionally associated with a policy which, if the Plan was made, would form part of the development plan. The submitted Plan is however designed as an initial stage of a two-stage process and which will be finally developed in its eventual review.

7.26 Nevertheless for the purpose of this examination I am satisfied that the approach followed is in the spirit of the strategic discussions that have taken place between HDC and the Parish Council. In particular the Plan commits to a review once the emerging Local Plan has been adopted. Within the context of the basic conditions test the assessment of the submitted neighbourhood plan is against the adopted HDPF and not the emerging Local Plan. In this context the delivery of new housing within the parish is not needed to meet the requirements of the housing development requirements of the HDPF.

- 7.27 In broad terms the submitted Plan is addressing two overlapping matters. The first is a broader package of policies for the parish based on a series of environmental and community issues. The second is the development of a strategic approach to set the scene for its review once the emerging Local Plan has been adopted. In particular the latter includes the promotion of brownfield housing development on the existing Huffwood Trading Estate and the identification of Local Gaps.
- 7.28 In terms of its response to the strategic issues it is important that the submitted neighbourhood plan appropriately addresses two related matters. The first is to ensure that it reflects the agreement which has been reached between HDC and the Parish Council on its format and content. The second is to ensure that the Plan proceeds in a way which does not hinder the ability of HDC to make strategic decisions for sustainable development in both the wider District and within the wider parish. This approach is an important consideration given the contents of section 41-044-20190509 of Planning Practice Guidance on the roles and responsibilities of a neighbourhood plan qualifying body (here the Parish Council) and the local planning authority (here HDC) when local plans and neighbourhood plans are being prepared at similar and/or overlapping times.
- 7.29 In general terms I am satisfied that the strategic approach taken is appropriate and, subject to the recommended modifications set in this report on a policy-by-policy basis and in relation to the review of any 'made' neighbourhood plan, meet the basic conditions. I have reached this conclusion recognising that the Plan does not include the Huffwood/Star Road package as a planning policy and that the eventual delivery of housing on the site may not meet the full extent of the longer-term strategic requirement for the neighbourhood area. As such it would be inappropriate at this stage to discount other options for strategic housing delivery. The matter will be much clearer in due course once the Local Plan has been adopted. In addition, the Huffwood/Star Road package will be more advanced at that time.
- 7.30 The other strategic element of the Plan is the proposed designation of Local Gaps to retain the separation of the various settlements in the neighbourhood area. The Local Gaps approach has both a positive and a negative element. In a positive sense it seeks to retain the separation of the various settlements and prevent their coalescence. It also celebrates the landscape characteristics of the parcels of land concerned. In a negative sense it prevents development which would reduce the openness and the break between the settlements concerned. This matter is particularly significant given the overlaps between parts of the identified Local Gaps and potential housing sites which have been considered by HDC as part of its evolving strategic housing and employment sites assessment work as part of the emerging Local Plan.
- 7.31 The specific issue of the designation of Local Gaps is considered in the next section of this report.

Policy 1: Retention of Local Gaps

Policy details

- 7.32 The policy proposes three Local Gaps (LGs) to the north of Partridge Green to retain its separation from Littleworth and Jolesfield. The proposed Gaps are as follows:
- Local Gap 1 Land to the east of Littleworth Lane/north of The Rise Partridge Green;
 - Local Gap 2 Land between Partridge Green and Littleworth; and
 - Local Gap 3 Land to the west of Church Road/north of The Rosary Partridge Green
- 7.33 The policy applies a restrictive approach to development in the identified LGs. It identifies the limited circumstances where development would be supported as follows:
- the proposal would not result in a significant reduction in the openness and break between the settlements concerned;
 - the proposal would contribute to the conservation and enhancement of the landscape character; and
 - the proposal would provide a landscape buffer to protect the residential amenities of neighbours.
- 7.34 The policy is underpinned by a detailed Background Paper. In summary it comments that the three proposed Local Gaps border the northern edge of Partridge Green and act as buffers between it and the surrounding countryside towards the settlements of Jolesfield and Littleworth. It comments that the gaps constitute a network of fields, trees and hedgerows which maintain the break between these settlements. The study highlights the extent to which the gaps are considered special and warrant protection in regard to landscape value and landscape capacity. They refer to other assessments carried out by Horsham District Council and West Sussex County Council. In addition, the Parish Council commissioned Lizard Landscape Design and Ecology (LLD) to produce a landscape review of the Local Gaps.
- 7.35 The information in the Background Paper and the associated Landscape Report is very thorough. In summary, the collective information:
- assesses the policy approach against policies in the HDPF;
 - assesses the policy approach against the NPPF;
 - identifies other examples of neighbourhood plans (and their associated examinations) which have incorporated a similar approach;
 - provides detailed commentary on the extent of the three proposed LGs and their particular characteristics;
 - provides a detailed response to the comments received at the pre-submission Plan; and

- provides a detailed review of the policy and highlights where it would add value to existing planning policies in the Horsham District Planning Framework (in the LLD study).

7.36 The format of the policy has been carefully designed to be in general conformity with that of Policy 27 (Settlement Coalescence) of the HDPF. In particular both policies highlight that development proposals will only be supported where there would be 'no significant reduction in the openness and break between settlements'

The relationship between the proposed LGs and potential housing allocations

7.37 There is an important degree of overlap between the intention of the neighbourhood plan to identify LGs and the work which HDC has undertaken as part of the December 2018 Strategic Housing and Economic Land Availability Assessment (SHELAA) exercise. That Assessment is an important part of the evidence base for the emerging Local Plan. The specific overlaps are as follows:

Proposed LG1 - The proposed LG1 is an identical area to that of the SHELAA site SA274 Land north of the Rise, Partridge Green. It is identified as a potential housing site which is available and capable of development within 6-10 years. It is anticipated to yield 40 homes.

Proposed LG3 - The proposed LG3 is an identical area to that of the SHELAA site SA320 Land west of Church Road, Partridge Green. It is identified as a potential housing site which is available and capable of development within 6-10 years. It is anticipated to yield 50 homes.

7.38 In a similar fashion the neighbourhood plan process has also assessed potential housing development sites which overlap with its proposed LG designations as follows:

Site P2 is identical to SHELAA SA320

Site P3 is identical to SHELAA SA274

Site P8 is the parcel of land at the junction of Mill Lane and the B2135. It is in the north western corner of LG2. It is identical to the site promoted by Henry Adams LLP in its representation to the Plan (as set out in paragraph 7.42).

Comments Received on the Policy

7.39 The policy has attracted a series of representations from the development industry and from HDC. They are addressed in paragraphs 7.38 to 7.41.

7.40 Reside Developments Limited object to the designation of proposed LG3. It comments that the designation of a 'gap' between Partridge Green and Jolesfield fails to contribute to the achievement of sustainable development as it unreasonably restricts the development of a sustainable and deliverable site without suitable, evidenced, justification.

- 7.41 Rydon Homes objects to the proposed designation of LG1. Whilst it acknowledges the principle of the policy it asserts that ‘the extent of the designated area is larger than necessary’. In this context it argues that ‘the important elements of the gap are the frontage to Littleworth Lane, Partridge Green and the setting of the heritage assets to the north. The Littleworth Lane frontage is marked by a strong hedge and trees. There are limited views across the field to the east. The perception of the gap is therefore more dependent upon the site frontage rather than the deeper part of the site. Similarly, the northern part of the site is the most important to protect the setting of the heritage assets’
- 7.42 The representation from Henry Adams LLP promotes a potential housing site at the corner of the B2135 and Mill Lane, Littleworth. In doing so it also makes comments on the wider policy. It asserts that it is not supported by sufficient evidence to justify the approach taken. The representation asserts that the policy has been introduced to prevent development.
- 7.43 HDC provided comments both on the policy and the specific nature of the proposed LGs. In general terms it draws attention to the potential implications for such a policy on its emerging Local Plan and the extent or otherwise that the policy would contribute to sustainable development within the Plan period. In particular it comments as follows:

‘robust evidence should be provided to justify a settlement gap policy and Local Gap designations should not be used to stymie potential development sites. It is acknowledged the wider housing need of the parish has yet to be addressed in this neighbourhood plan. The wider issue of meeting local housing need will be undertaken through the review of the development plan and until such time this matter has been settled the designation of local gaps and green space must be consistent with local planning for sustainable development in the area and must not undermine the requirement to meet identified local need. As raised previously, it is strongly advised that both Local Gap 2 and Local Gap 3 are amended to not incorporate the southern fields which adjoin the settlement edge. These two southern fields are considered to have moderate capacity for development. Furthermore, it is the consideration of officers that there is landscape capacity for low to moderate capacity for small scale development in LG3 (shaded green) and the proposed Local Gap is considered to be inappropriate and would be contrary to Policy 27 of the HDPF. The proposed gap does not function to prevent coalescence with another settlement and is inconsistent with the district wide planning of sustainable development and complement investment in providing sufficient homes, employment and other essential community amenities.’

The need or otherwise for the identification of specific Gaps

- 7.44 I sought clarification from the Parish Council on whether the policy could take on a more general format that was similar to that in Policy 27 of the HDPF. It commented as follows:

‘It is considered a defined Local Gap is required not only to prevent coalescence as an absolute, but also to prevent coalescence through the cumulative impact of development, such as incremental development within the Local Gap area. (It) is considered, without this physical spatial definition there remains a risk that piecemeal

encroachment from development could be allowed, which would cause harm to the rural context, relative openness and break between the respective settlements, both alone and cumulatively. It is considered a more general (non-site specific) policy would merely repeat higher tier policy and would not offer a targeted approach. Without a defined physical boundary, it would be ambiguous when the policy should and should not be applied'

- 7.45 I have considered this matter very carefully. Taking account of all the available information I am satisfied that it is appropriate in general terms for the neighbourhood plan to define LGs. I have reached this conclusion for two related reasons. Firstly, they will provide a more local and detailed response to the general approach in the HDPF. Secondly, they will properly define the parcels of land which need to be safeguarded in order to prevent the coalescence of the specific settlements in the neighbourhood area.
- 7.46 I am satisfied that the Parish Council's approach towards identifying LGs has regard to national policy in general terms, and to paragraphs 127c and 170b of the NPPF in particular. I am also satisfied that it is in general conformity with Strategic Policy 27 of the HDPF. In particular the way in which the policy has been prepared provides a degree of spatial clarity which is, by definition, not included within the Policy 27 of the HDPF.

The spatial definition of the proposed LGs

- 7.47 I turn now to the spatial definition of the three proposed LGs. The policy, the supporting text and the background studies comment about both the location of the various settlements and the potential for their coalescence and about the quality of the landscape within the identified areas. For the purpose of this examination I will examine the policy primarily as a land use policy designed to prevent the coalescence of settlements. The Parish Council confirmed that this was the intention of the policy in its response to the clarification note. Nevertheless, the policy has been informed by extensive work on assessing the nature and the quality of the local landscape. I summarise the principal studies in paragraphs 7.48 to 7.56 below.
- 7.48 The LLD study helpfully summarises the general character of the landscape within the neighbourhood area. In doing so it refers to the Landscape Character Assessment of Sussex (2003). The 2003 Assessment identified 42 landscape character areas of West Sussex and developed land management guidelines for each character area. The neighbourhood area is located within the Eastern Low Weald Landscape Character Area (LCA LW10) of the Low Weald Landscape Character Type.
- 7.49 The overall character description for LCA LW10 is one of a lowland mixed pastoral and arable landscape with a strong hedgerow pattern. It lies over low ridges and clay vales drained by the upper Adur streams. Key characteristics identified for LCA LW10 (as relevant to the neighbourhood area) include:
- gently undulating low ridges and clay vales;
 - views dominated by the steep downland scarp to the south and the High Weald fringes to the north;

- arable and pastoral rural landscape, a mosaic of small and larger fields, scattered woodlands, shaws and hedgerows with hedgerow trees;
- quieter and more secluded, confined rural landscape to the west;
- biodiversity in woodland, meadowland, ponds and wetland;
- a mix of farmsteads and hamlets favouring ridgeline locations, strung out along lanes;
- crossed by north-south roads with a rectilinear network of narrow rural lanes; and
- varied traditional rural buildings built with diverse materials including timber-framing, weatherboarding, Horsham Stone roofing and varieties of local brick and tile-hanging.'

7.50 The Sussex study has also been supplemented by one specific to Horsham District (the Horsham District Landscape Character Assessment 2003). This study identified sixteen Landscape Character Types (LCT), with subsequent Landscape Character Areas (LCA) defined at a scale of 1:25,000. The neighbourhood area is located within the Cowfold and Shermanbury Farmlands (LCA J3) of the Broad Clay Vale Farmlands LCT. LCA J3 is characterised by 'gently undulating area of low ridges and valleys lies over the Weald Clay and the southern edge of the Tunbridge Wells sands. It has both small scale intricate field patterns of pasture and some larger scale arable fields. Scattered woodlands, hedgerows and shaws create enclosure and restrict views, although there are some more open areas where hedgerows have been lost. Despite localised visual intrusion from pylons and some urban development on the A283, the area generally has an undeveloped rural character'.

7.51 The Cowfold and Shermanbury Farmlands LCA identified Planning and Land Management Guidelines are as follows:

- to conserve the rural undeveloped character;
- to ensure any appropriate development responds to historic settlement patterns and local design and building materials;
- to secure landscape improvements to screen suburban edges of Partridge Green and ribbon development at Shermanbury;
- to conserve and enhance existing network of hedgerows and shaws;
- to maintain the pattern of small-scale pastures;
- to encourage the natural regeneration of hedgerow oaks and or plant new ones;
- to encourage establishment of small woodlands.

7.52 These important characteristics have underpinned the work undertaken by the Parish Council in identifying LGs. They are reflected in the supporting text to Policy 1.

7.53 In a similar fashion these considerations have informed the work which HDC has undertaken on landscape sensitivity in relation to future new development. This was initially captured in the Horsham District Landscape Capacity Assessment 2014. The introduction to the Assessment helpfully sets out its role and purpose as follows:

'In recent years, the need for housing development has placed considerable pressure for development on greenfield land around villages and towns in Horsham District. This is partly due to the relative lack of brownfield sites, but may also reflect the fact that

much of the landscape in the South East is protected by a range of designations including the South Downs National Park, the High Weald AONB and Green Belt. This restricts the amount of development that can take place in these areas, and may increase pressure on the remaining undesignated land to meet these needs. It is however recognised that all landscapes can be highly valued by local people and that there is a need to conserve and enhance landscape character and local distinctiveness, and to take this into account as part of decisions about appropriate sustainable development. In order to continue to protect, conserve and enhance the landscape in the District, there is a need to ensure that decisions about the location and scale of new development as far as possible takes into consideration the relative ability of the varied landscapes around and between settlements to accommodate new development’.

- 7.54 The Capacity Assessment highlights that its key objectives are to provide a transparent, consistent and objective assessment of the landscape capacity of the land around existing Category 1 and Category 2 settlements to accommodate housing and employment development and to identify areas where new development could best be accommodated without unacceptable adverse landscape and visual impacts. In this context the Assessment emphasises that its scope is to assess landscape capacity only. In doing so it acknowledges that the overall suitability of potential sites for development will depend on a range of other considerations including access, infrastructure constraints, to other environmental considerations including flood risk, ecology, heritage and archaeology and air quality. The Capacity Assessment makes the following specific observations for the neighbourhood area:

‘As there are no strong physical boundaries to development around Partridge Green, all the countryside around the settlement has been included within the capacity assessment. The landscape falls within the Low Weald National Character area, and Horsham District Character Areas J3: Cowfold and Shermanbury Farmlands, and P2: Upper Adur Valley. Overall, the landscape is gently undulating and comprises a mix of smaller and larger scale fields with some scattered woodlands, and to the south of the village the course of the river Adur, which has narrow valleys with gentle sides.’

‘Whilst some landscape features and qualities are sensitive to housing development, the mostly moderate visual sensitivity of the area, and moderate landscape value results in an assessment of moderate capacity for small scale housing development. It would be very important to minimise any adverse impact from loss of hedgerows to development, to avoid the impression of urban sprawl into the area and to relate any development closely to the existing settlement edge’

- 7.55 The 2014 Assessment was updated in 2020. It refines the analysis to address the capacity of the landscape in relation to medium and smaller settlements to accommodate both medium scale housing development (60 to 250 dwellings) and small-scale housing development (up to 60 dwellings). However, for the purposes of this report there are no material differences between the two studies.
- 7.56 In their different ways these various Assessments and their findings are incorporated into the LLD commentary on its assessment of the proposed LGs and in its critique of the work which HDC undertook on its 2014 Capacity Assessment. The same

landscape information is also referenced in the work which HDC has undertaken on its SHELAA and which itself is contributing towards the evolving Local Plan.

General commentary

- 7.57 It is clear that two issues are running side-by-side in terms of the assessment of this policy against the basic conditions. The first is the Plan's ambition to provide detailed local clarity to that contained in HDPF Policy 27 on preventing the coalescence of settlements in the neighbourhood area. The second is the emerging process of selecting potential development sites to feed into the Local Plan process and to meet local requirements for strategic growth. Plainly the two issues raise overlapping and potentially-conflicting considerations.
- 7.58 In this context the District Landscape Capacity Assessments (2014/2020) identify the attractiveness and the sensitivity of the landscape in the neighbourhood area. Nevertheless, they recognise that the neighbourhood area is neither within the South Downs National Park nor within the High Weald AONB. They also acknowledge that landscape is one of a series of issues which need to be considered in the round as it looks to provide a policy basis to deliver sustainable development in the District. For the purposes of this examination Policy 1 is concerned directly with an ambition to prevent the coalescence of settlements rather than to develop a detailed approach towards landscape protection and enhancement. Paragraph 7.47 of this report has already addressed this matter in detail.
- 7.59 I looked at the three LGs carefully as part of my visit to the neighbourhood area. I did so from the surrounding road network, from any footpaths within the LGs themselves and within the immediate vicinity. I comment on them in detail in paragraphs 7.60 to 7.70 below.

Proposed LG2

- 7.60 In my judgement proposed LG2 is entirely appropriate for identification as a LG. It is an obvious physical gap between Partridge Green and Littleworth. In addition, its definition between Church Road and Littleworth Lane reflects the form and layout of the two separate settlements. The gap between the two settlements (north to south) is approximately 400 metres. It includes various tracts of land and the concentration of dwellings off Jolesfield.
- 7.61 In addition there is clear potential for the coalescence of the affected settlements in the absence of a strong and robust application of planning policy. This would particularly apply in the case of development proposals to the immediate north of Partridge Green and to the south of Littleworth.
- 7.62 In general terms the proposed LG is of a size and character which is typical of other local gaps identified in neighbourhood plans elsewhere. In landscape terms it displays many of the characteristics of the Cowfold and Shermanbury Farmlands LCA (see paragraph 7.51 of this report) including parcels of land on the edge of Partridge Green and a mix of land uses reflecting historic parcels of land and ownerships.

- 7.63 In coming to this judgement I have taken account of the representation from Henry Adams to the Plan in respect of the proposed residential development of a parcel of land at the junction of the B2135/Mill Lane, Littleworth. It occupies the north western corner of the proposed LG2. I have not recommended any modifications to this part of LG2 for two related reasons. The first is that the geographic and functional relationship of the site is with the unclassified settlement of Littleworth to its east and not to Partridge Green to its south. Secondly the representation comments that any potential residential development would be related to the unspecified promotion of additional land to the south for development.
- 7.64 In its response to the clarification note the Parish Council itself proposed a potential reduction in the spatial extent of LG2 by way of the removal of the gardens to the north of the allotments in Littleworth. I have considered this proposition very carefully. In my judgement it would be inappropriate to vary the spatial extent of the proposed LG2 in this way. I have reached this conclusion for two reasons. The first is that the proposed LG has both an appropriate scale and geographic sensitivity. The removal of an element of the proposed local gap would reduce its overall integrity. In this case the matter is particularly significant given that the parcel of land abuts Littleworth to the north. The second is that the public have not had an opportunity to comment on the potential reduction in the scale of proposed LG2 from that which was included in the submitted Plan.

Proposed LG1 and LG3

- 7.65 Proposed LG1 and LG3 present a different set of issue to those found in LG2. In both cases they are attractive areas of countryside which surround Partridge Green. Their characteristics are highlighted in detail in the LLD study. In some cases, potential developers have made their own commentary on the characteristics of the two parcels of land.
- 7.66 Plainly they are much smaller than LG2. In this context they are seen in the landscape as self-contained parcels of agricultural land with extensive, traditional trees and hedgerows forming their boundaries. In this context I have concluded that they are specific and discrete parcels of land on the edge of Partridge Green. In this context they are typical of agricultural parcels of land which are located on the edge of villages. Whilst any potential development on the parcels of land would add to the limited amount of linear development along both the B2135 and Littleworth Lane in my judgement this approach would not undermine the wider policy objective of preventing the coalescence of Partridge Green and Littleworth.
- 7.67 In addition within the wider preparation of the different elements of the development plan the designation of LGs in the submitted neighbourhood plan runs the risk of conflicting with evolving work on the preparation of the Horsham Local Plan and the associated site selection process. In effect the neighbourhood plan is proposing to establish strategic matters (directly/indirectly) which are properly to be addressed in the emerging Local Plan. This also has an implication on the approach which has been agreed between HDC and the Parish Council on the complementary development of the neighbourhood plan and the emerging local plan.

- 7.68 In assessing this policy in general, and the extent of the proposed LGs I have taken account of the other neighbourhood plans (and their examinations) as set out in the LG Background Paper. They provide a useful reference point. However, they reflect the different circumstances of the neighbourhood areas concerned and the specific ways in which the policies had addressed strategic policies and site considerations.
- 7.69 Taking account of all the information available to me I recommend that proposed LG1 and LG3 are deleted from the Plan. I also recommend consequential modifications to the supporting text.
- 7.70 In coming to this conclusion I do not make any judgement about the potential or otherwise for the land within the proposed LG1 and LG3 to be developed for residential purposes. Whilst they are promoted for such development by housebuilders in their different representations, the Plan itself does not propose any housing allocations. The overall scale and nature of residential development will be determined in the emerging Local Plan and in the eventual review of any 'made' neighbourhood plan.

The Policy itself

- 7.71 The policy itself follows a similar format to that of Policy 27 of the HDPF. I recommend detailed modifications to its format and structure so that it has the clarity required for a neighbourhood plan policy. I also recommend its third criterion takes a more general approach.
- 7.72 As submitted the policy requires the construction of a landscape buffer. This approach has the ability to be neither appropriate to the development concerned nor proportionate to its nature and scale. However, I recommend that the potential for a response of this type is repositioned into the supporting text. I also recommend that the title of the policy becomes more general. As submitted, it assumes that Local Gaps are already identified and should be retained.

Replace the opening element of the policy with: 'Development proposals between the settlements of Partridge Green, Jolesfield and Littleworth and land centred around Jolesfield Common, as identified on the Policies Map, will not be supported unless it can be demonstrated that:

In criterion 1 replace 'There is no significant reduction' with 'they do not result in an unacceptable reduction'

In criterion 2 replace 'Proposals' with 'where appropriate they'

In criterion 3 replace 'Proposals...protect' with 'they safeguard' and neighbours' with 'neighbouring properties'

Delete LG1 and LG3 from the Policies Map

In paragraph 4.9 delete 'as Local Gap 1, Local Gap 2 and Local Gap 3'

At the end of paragraph 4.12 add: 'Policy 1 sets out the Plan's approach to this matter. It adds local value to Policy 27 of the Horsham District Planning Framework. In particular, it identifies the limited circumstances in which development proposals will

be supported within the identified Local Gap. The third criterion requires that any development which would comply with the general principles of the policy should also safeguard the amenities of existing residential properties in and around the Local Gap. Plainly this will be determined on a case-by-case basis in relation to the scale and the nature of the proposal concerned. However, in some circumstances a landscaped buffer and/or other similar environmental treatments may be appropriate'

Replace the policy title with 'Local Gap'

Policy 2: Open Spaces

- 7.73 This policy sets out the Plan's approach to open spaces. It has two related parts. The first resists proposals which would result in the loss of open spaces. The second offers support to proposals which would provide open spaces.
- 7.74 The Plan does not identify specific areas of open space. However, in paragraph 4.14 it defines open space as 'including, but not be limited to, formal space such as sports pitches and tennis courts etc, informal space, such as parkland, and children's play space, including equipped areas both for young and older children'.
- 7.75 In its response to the clarification note the Parish Council commented that it had not undertaken any detailed work to identify specific areas of open space and was satisfied that the general definition in paragraph 4.14 was sufficient for the purposes of a neighbourhood plan policy. Having considered all the information carefully I have concluded that, on balance, that the approach taken not to identify specific areas of open space is appropriate given the character of the neighbourhood area. The location of open space in the various settlements is clear and obvious. It would however be an area which the forthcoming review of any 'made' neighbourhood plan could usefully address.
- 7.76 The wording used in the first part of the policy is very matter of fact. In particular it does not provide the flexibility for development proposals affecting open spaces where the circumstances highlighted in paragraph 97 of the NPPF apply (namely surplus to requirements/replacement by better provision/the development of alternative facilities). In this context the policy does not have regard to and takes an approach which is more restrictive than national policy. I recommend a modification to remedy this matter. Otherwise the policy meets the basic conditions.

At the end of the first part of the policy add: 'unless they otherwise demonstrate how they comply with any of the exceptions identified in paragraph 97 of the NPPF'

Policy 3: Local Green Space

- 7.77 This policy proposes the designation of three local green spaces (LGSs). It comments about the relationship between the identified spaces and the policy approach for such designations in the NPPF. The LGS Background Paper sets out details about the various proposed LGSs. In general terms it does so to good effect. In particular it seeks

to assess the various LGSs against the criteria in the NPPF (paragraph 100) for such designations.

- 7.78 I looked at the proposed LGSs carefully when I visited the parish. Two are located in Partridge Green and one is located in Dial Post. Based on all the available information, I am satisfied that the proposed LGSs meet the basic conditions. In their own ways they are in close proximity to the communities that they serve, are demonstrably special to the local community and are local in scale.
- 7.79 In addition, I am satisfied that their proposed designation accords with the more general elements of paragraph 99 of the NPPF. Firstly, I am satisfied that the designations are consistent with the local planning of sustainable development. Their designation does not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGSs are capable of enduring beyond the end of the Plan period. Indeed, they are established elements of the local environment and have existed in their current format for many years. In addition, no evidence was brought forward during the examination that would suggest that the local green spaces would not endure beyond the end of the Plan period.
- 7.80 The policy itself takes the matter-of-fact approach in the NPPF. However, it seeks to identify the special circumstances where development might be supported. I sought clarification from the Parish Council on its approach to this matter. It commented that:
- ‘The types of development considered to be acceptable have been included in the Policy, rather than the supporting text, to ensure full weight is given to the circumstances in the determination of any application within these areas. It is considered the proposed approach avoids conflict between supporting text and policy. Furthermore, the approach seeks to minimise confusion, provide clarity to the decision maker and serve a clear purpose’*
- 7.81 I have considered this matter very carefully in general terms, and in particular in relation to the recent consideration of an equivalent policy in a neighbourhood plan in Mendip District in the Court of Appeal (2020 EWCA Civ 1259). Whilst I can see that the approach is intended to be helpful it can be more conveniently addressed in the supporting text. HDC will be able to reach its own decisions on any applications which come forward on the designated LGSs. I recommend that the second part of the policy follows the NPPF approach and that the supporting text clarifies this matter.

Replace the second part of the policy with:

‘Development proposals within the designated local green spaces will only be supported in very special circumstances’

At the end of paragraph 4.21 add: ‘Policy 3 follows the matter-of-fact approach in the NPPF. In the event that development proposals come forward on the local green spaces within the Plan period, they can be assessed on a case-by-case basis by the District Council. In particular it will be able to make an informed judgement on the

extent to which the proposal concerned demonstrates the ‘very special circumstances’ required by the policy’

Policy 4: Green Infrastructure

- 7.82 This policy sets out the Plan’s approach to Green Infrastructure (GI). It offers support to proposals which would meet five GI-related criteria. As paragraph 4.24 comments ‘public consultation events highlighted a local desire to protect existing woodland and to protect and enhance wildlife habitats. In order to protect existing species, and to promote the use of traditional native species, the Parish Council wish to support development proposals which positively seek to include/improve Green Infrastructure’.
- 7.83 I recommend modifications to the general approach so that it is clear that the policy will be applied as appropriate to the developments proposed. As submitted, it would require any development proposal to comply with each of the five criteria. This may be inappropriate to particular schemes. I also recommend modifications to some of the criteria to take account of detailed comments from HDC. In each case they would allow the policy to be clearer and therefore capable of being implemented through the development management process.

Replace the opening part of the policy with: ‘As appropriate to their scale and nature development proposals will be supported which:’

In criterion 2 replace ‘to screen.... necessary’ with ‘to complement green infrastructure and biodiversity’

At the end of criterion 3 add ‘and, where practicable connect habitat and wildlife populations’

At the end of criterion 5 add ‘and, where practicable provide attractive and accessible links to the existing network’

Policy 5: Community Facilities

- 7.84 This policy addresses community facilities. I saw their importance to the wellbeing of the neighbourhood area during my visit. The policy has three related parts as follows:
- offering support to proposals to enhance existing community facilities;
 - relating the development of replacement facilities with the associated redevelopment of the site of an existing facility; and
 - identifying the limited circumstances where the loss of existing facilities would be supported.
- 7.85 Paragraph 5.3 provides a definition of the facilities affected by this policy. This approach provides the necessary clarity.
- 7.86 I recommend detailed modifications to the policy so that it has the clarity required by the NPPF. Otherwise it meets the basic conditions.

In the second part of the policy replace 'is to' with 'should'
In the third part of the policy replace 'be resisted' with 'not be supported'

Policy 6: Broadband

- 7.87 This policy recognises the importance of good Broadband connections for local residents and business alike. It offers support to sensitive proposals which would provide access to super-fast Broadband
- 7.88 The policy is both evidence-based and well-developed. It meets the basic conditions.

Policy 7: Retail Premises

- 7.89 This policy sets out the Plan's approach to retail premises. The existing retail premises in the neighbourhood area are mainly concentrated within the village centre of Partridge Green.
- 7.90 The Plan acknowledges that in smaller towns and villages maintaining a retail presence is a challenge, given that there is a need for some adjustment in order to best serve customers with competitive locations that reflect ongoing changes in the pattern of supply and delivery of goods and services. It is therefore considered important to seek to preserve and enhance the vitality and viability of the existing services and retail facilities in the Parish.
- 7.91 The policy seeks to support retail facilities in two related ways. The first part of the policy offers support to new retail facilities. The second does not offer support to proposals which would involve a loss of such facilities.
- 7.92 The policy was developed in good faith in the period leading up to its submission. However, in September 2020 the Use Classes Order was substantially revised. It introduces three new use classes as follows:

Class E	Commercial, business and service uses
Class F1	Learning and non-residential uses
Class F2	Local community uses

The new Use Class E incorporates several former use classes including A1(shops), A2 (financial and professional services) and A3 (cafes or restaurants). In this context there is now considerable flexibility for different business functions to be undertaken in towns and village centres without the need for planning permission.

- 7.93 In its response to the clarification note the Parish Council confirmed its willingness to retain a policy of this type, and for it to be modified to ensure that it has regard to national policy.
- 7.94 In this context I recommend specific modifications to the policy to take account of the revised approach and details of the 2020 Use Classes Order. In particular I recommend that the policy incorporates the principal new E Use Class which affects

the vitality of village centres. I also recommend that it incorporates the new Use Class F2. This includes smaller shops and would be consistent with the approach in the submitted Plan. This approach would reflect the Plan's support for the ongoing safeguarding and extension of the role, importance and significance of the village centre. The effect of this approach is that the modified policy will accord with the government's wider ambition to stimulate the role of town and village centres and therefore meets the basic conditions. Whilst the scope of Class E uses is broader than that of the former Class A1 retail use the effect of the policy remains.

- 7.95 I also recommend other detailed modifications to the policy so that it would have the clarity required by the NPPF in general. Finally, I recommend that the supporting text is consolidated to take account of the recent changes to the Use Class Order.

In Part 1 of the policy:

- **Replace 'retail premises' with 'E (Commercial, business and service uses) and F2 (Local community uses)'**
- **Replace 'are sensitive to residential amenities' with 'do not have unacceptable impacts on the amenity of residential properties in the immediate locality,'**

In Part 2 of the policy:

- **Replace 'The loss of.... will be resisted' with 'Proposals for the change of use of premises in the E and F2 Use Classes will not be supported'**
- **Replace 'existing retail use is' with 'the existing uses are'**

Replace paragraphs 7.7 and 7.8 with:

'7.7 Policy 7 sets out a policy context that builds on this approach. It takes account of the changes to the Use Classes Order introduced in September 2020. It provides a local response to the government's agenda to consolidate town and village centres in the context of the challenges created by the Covid pandemic'

7.8 It takes account of two of the new Use Classes which are included in the Order - Class E (Commercial, business and service uses) and Class F2 (Local community uses) – which replaces the previous Class A1 Use Class (retail uses)'

Policy 8: Employment

- 7.96 This policy comments on employment development. It sets out a positive approach to such development. It takes a flexible approach to employment development which takes account of the environmental sensitivities of the neighbourhood area.
- 7.97 HDC raise issues about the extent to which the policy is in general conformity with Policy 10 of the HDPF. I have taken these comments into account. I have also considered the contents of the more recent NPPF (2019). Its paragraph 84 comments that:

'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist'

- 7.98 Taking account of all the relevant information I am satisfied that the policy takes an appropriate stance which has regard to national policy. Nevertheless, I recommend that the opening element of the second part of the policy is modified so that it sets a clearer context for alternative proposals where on-site expansion is impracticable. I also recommend modifications to the way in which the two sets of criteria are structured.
- 7.99 Finally I recommend detailed modifications to wording used in the policy so that it will have the clarity required by the NPPF

In the first part of the policy replace 'quality' with 'nature'

Replace 'Where business.... through expansion' with 'Where the expansion or consolidation of businesses on their existing sites is impracticable'

Replace the two sets of criteria (a-c) with bullet points.

In the fourth bullet point replace 'In' with 'in'.

In the final bullet point replace 'adverse' with 'unacceptable'

Policy 9: Redundant Farm Buildings

- 7.100 This policy sets out the Plan's approach towards the use of redundant farm buildings. It includes a series of criteria for their use for employment purposes. The approach makes a clear preference for employment use against residential uses.
- 7.101 The policy has attracted a degree of representation. In summary the representations comment about the relationship between the policy and policies in the HDPF, national policy and the implications of permitted development rights for residential uses of such buildings. The Parish Council reaffirmed its continued support for the intended policy approach in its response to the clarification note. In doing so, it commented that it considered the policy to be complementary to national and local policies
- 7.102 I have considered these matters very carefully. The Parish Council's ambitions for employment and tourism use of redundant buildings represents a positive use of these traditional buildings. Nevertheless, the very specific approach runs contrary to national and local policies and without any detailed justification to do so. In these circumstances I recommend that the policy is deleted from the Plan for the following reasons:

- paragraph 79d of the NPPF offers support for the residential use of redundant or disused buildings in the countryside;
- the policy adds little if any distinctive local detail to Policy 10 of the HDPF; and
- recent changes to permitted development rights have given considerable flexibility for the conversion of such buildings under prior notification arrangements by way of Class Q of The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2018.

Delete the policy

Delete paragraphs 7.11 to 7.14

Policy 10: Car Parking

7.103 This policy addresses car parking issues. It has three related elements. The first offers support for new public car parking in Partridge Green village centre. The second requires appropriate on-site parking for new commercial and leisure development. The third resists proposals which would result in the net loss of public car parking in Partridge Green. In their different ways the elements of the policy reflect the distinctive issues relating to car parking facilities in Partridge Green.

7.104 The first part of the policy meets the basic conditions.

7.105 I recommend that the second part of the policy is modified so that it directly relates to adopted parking standards rather than to the looser description of the satisfaction of the authorities concerned

7.106 The third part of the policy is an important response to the limited parking facilities in Partridge Green. Whilst it resists proposals which would result in the loss of existing parking facilities it does so in a flexible way which takes account of solutions which would deliver alternative car parking. I recommend a detailed modification to the wording used and another which would complete this part of the policy based on the Parish Council's response to the clarification note. Otherwise the wider policy meets the basic conditions.

In the second part of the policy delete 'to the satisfaction.... authorities' Thereafter add at the end: 'to the most up to date standards of West Sussex County Council'

In the third part of the policy replace 'be discouraged' with 'not be supported' and add 'impact' at the end.

The Community Aims

7.107 The Plan includes a series of non-land use Aims. They are incorporated on a themed basis throughout the Plan after the relevant policies.

7.108 National policy comments that community aspirations should be included in a separate section of a neighbourhood plan to ensure that they are distinct from the land use policies. On balance I am satisfied that the way in which the Plan has incorporated the community aims is appropriate. I have come to this judgement for two reasons. The first is that in most cases the Aims consolidate the approach taken in the relevant land use policies. The second is that the Aims are shown in a different colour to the land use policies.

7.109 I am satisfied that the Aims are distinctive to the neighbourhood area. The following aspirations are particularly noteworthy:

- Roads, Traffic and Congestion (Aim 3)
- Congestion and Parking (Aim 4)
- Highways and Pedestrian Safety (Aim 5)
- Bus Services (Aim 6)
- Footpaths, Bridleways and Cycleways (Aim 7)

Aim 2 Huffwood Trading Estate and Star Road

7.110 In many ways Aim 2 lies at the heart of the Plan. In summary it offers support for the redevelopment of the Huffwood Trading Estate for residential purposes associated with the relocation of the existing commercial uses at Huffwood to the Star Road Industrial Estate. This approach follows on from Public feedback at exhibitions.

7.111 The emerging proposal has already been addressed in earlier sections of this report. An update on progress on the scheme from the Parish Council is included in paragraph 7.21 of this report. The direction of travel is positive. Plainly this issue will find its own level as the details are prepared. It is included in the Plan as a non-land use Aim rather than as a planning policy. On this basis it would not form part of the development plan in the event that the neighbourhood plan was made. In the event that the anticipated planning application is approved the housing numbers would be considered as a commitment.

7.112 In the round I am satisfied that in general terms Aim 2 is an appropriate ambition to be included within the Plan. Similarly, I am satisfied that it has been addressed as a non-land use Aim rather than as a land use policy. In particular national policy actively encourages proposals which would make a positive use of brownfield land. The Parish Council has committed to review any made neighbourhood plan quickly once the emerging Local Plan has been adopted. In this context the matter can be addressed as required as the neighbourhood plan review responds to the housing numbers which are allocated to the parish in the Local Plan. At this stage the Plan will be able to assess the number of houses that could be delivered on the Huffwood site and any residual numbers required to meet the strategic requirement for the neighbourhood area.

7.113 Nevertheless I recommend that the Aim is modified. I do so for two reasons. The first is that as submitted it reads partly as a statement of intent and partly as a criteria-based policy rather than as a community Aim. The second is that several of its sections

explain the nature of the Aim rather than identifying its remit. In any event these elements of the Aim largely repeat the otherwise comprehensive supporting text in Section 6 of the Plan.

Replace Aim 2 with:

‘The Parish Council will work collaboratively with relevant landowners on comprehensive proposals for the commercial uses on Huffwood Trading Estate to be relocated to new units on land to the south of Star Road, with Huffwood being freed up for residential development. In doing so it will seek to ensure that:

a. appropriate provision is made for the existing business uses on Huffwood to be relocated to Land south of Star Road prior to the commencement of the residential development on Huffwood; and

b. there is no net loss of employment floor space resulting from the transfer of businesses on Huffwood to land south of Star Road.

Implementation and Delivery

7.114 Section 9 of the Plan addresses the implementation and delivery of the Plan. In particular it provides a direct connection to the arrangements which HDC and the Parish Council have put in place for the eventual review of the neighbourhood plan. This is good practice in general terms. It is particularly important given the way in which the Plan has been developed.

7.115 Paragraph 9.4 comments about the potential timing of a review of any made neighbourhood plan with the adoption of the emerging local plan. As submitted, it assumes a timetable for the local plan over which the Parish Council has no control. I recommend a more flexible approach which would ensure a subsequent review of the neighbourhood plan once the local plan has been adopted. The Parish Council agreed to this approach in its response to the clarification note. I also recommend that its tone is changed so that any potential review of this matter is a direct proposal of the Plan.

7.116 Paragraph 9.5 comments about the Huffwood/Star Road package. I also recommend that its tone is changed so that any potential review of this matter is a direct proposal of the Plan.

Replace paragraph 9.4 with:

In this context, the Parish Council has agreed with HDC to undertake a review of the neighbourhood plan in order to take account of any revised housing numbers which are allocated to the Parish in the emerging Local Plan. The Parish Council commits to commence a review within twelve months of the adoption of the Local Plan or by early 2023, whichever is sooner. ‘

Replace paragraph 9.5 with:

The strategic approach in Aim 2 (North and South of Star Road) is being explored exhaustively. In the event that it is unable to accommodate fully the requirement allotted to West Grinstead Parish in the forthcoming Local Plan, all options, including

potential greenfield releases, will be considered as part of the review of the neighbourhood plan.

Other matters – General

- 7.117 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned, I have highlighted them in this report. However, other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. It will be appropriate for HDC and the Parish Council to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community.
- 8.2 Following my independent examination of the Plan I have concluded that the West Grinstead Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report I recommend to Horsham District Council that, subject to the incorporation of the modifications set out in this report, the West Grinstead Neighbourhood Development Plan should proceed to referendum.

Referendum Area

- 8.4 I am required to consider whether the referendum area should be extended beyond the Plan area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by Horsham District Council on 31 October 2013.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in an efficient manner. The Parish Council's response to the clarification note was particularly comprehensive and helpful.

Andrew Ashcroft
Independent Examiner
9 December 2020