



## **Horsham District Council**

### **Cowfold Neighbourhood Plan 2015-2031**

## **Notice of Factual Updates to the Cowfold Decision Statement**

**(8 November 2024)**

### **1.0 INTRODUCTION**

- 1.1 Horsham District Council (“the Council”) (HDC) has a statutory duty<sup>1</sup> to support Parish Councils and Qualifying Bodies in the preparation of Neighbourhood Development Plans (NDPs) and Orders and to take NDPs and Orders through a process of examination and referendum.
- 1.2 This notice relates to the Cowfold Neighbourhood Plan 2015-2031 (CNP) and is an addendum to the 8 November Decision Statement published by Horsham District Council pursuant to Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended). This notice does not replace the Decision Notice but sets out why HDC remains of the view that the CNP meets the basic conditions and, incorporating amendments proposed in the Decision Statement, complies with the Conservation of Habitats and Species Regulations 2017.
- 1.3 On 14 September 2021, Horsham District (together with a number of other local planning authorities in north west Sussex) received a Position Statement from Natural England on water neutrality. This set out that water abstraction for drinking water supplies was having a negative impact on the wildlife sites in the Arun Valley. This has led to a significant delay in the Cowfold Neighbourhood Plan proceeding to referendum and has required further work, which has been subject to consultation, and additional modifications made to ensure the plan either alone or in combination with other plans or projects and is therefore compliant with the Conservation of Habitats and Species Regulations 2017. This is discussed in detail in Section 3 of the 8 November Decision Statement.

### **2.0 NOTICE OF FACTUAL UPDATES**

- 2.1 Following successful examination and the receipt of the Examiner’s Report, the Council decided to make the CNP and duly published a Decision Statement on the 8 November 2024 to progress the Cowfold Neighbourhood Plan to referendum. Subsequently, the Local Plan Inspector has recommended the HDLP

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<sup>1</sup> The Town and Country Planning Act 1990 (as amended)

is withdrawn in his Interim Findings Letter dated 4 April 2025. Horsham District Council considers this to be a significant change of circumstances. To ensure compliance with Schedule 4B of the Town and Country Planning Act 1990, Paragraph 12 (6), further modifications are made to the Cowfold Neighbourhood Plan for the purpose of correcting errors such that all references made to HDLP and the policies therein are removed from the Cowfold Neighbourhood Plan to reflect the diminished status of the HDLP. Additional amendments have also been made to the Cowfold Neighbourhood Plan for the purpose of correcting cross-referencing errors following publication of the latest version of the NPPF (2024). Appendix A of this notice refers to a list of modifications to reflect those factual changes.

- 2.2 These factual corrections do not affect the substantive content of the CNP. The Examiner's proposed modifications as stipulated within Appendix B (8 November Decision Statement) alongside the reason why the modifications were accepted remain valid. In addition, further modifications in relation to Water Neutrality have been incorporated into CNP to demonstrate compliance with the Basic Conditions in relation to compatibility with EU obligations and for the purpose of correcting errors. The Council is of the view that the Cowfold Neighbourhood Plan as modified in Appendix B: Examiner's Proposed Modifications to the Cowfold Neighbourhood Plan 2014-2031 alongside this notice, complies with legal requirements and may now proceed to Referendum.



**Catherine Howe**  
Head of Strategic Planning  
25 July 2025

**Appendix A: Schedule of Modifications to the update the CNP to reflect the status of the HDLP and the latest version of the NPPF 2024**

**Modifications (insertion underline, omission as ~~strikethrough~~)**

<b>Policies</b>	<b>Examiner's Modifications (insertion <u>underline</u>, omission as <del>strikethrough</del>)</b>	<b>Decision and Reasoning</b>	<b>Action Taken</b>
Policy 1: Groundwater and Surface-water Flood Risk	<p>Policy 1: Groundwater and Surface-water Flood Risk</p> <ul style="list-style-type: none"> <li>i. Development proposals that incorporate sustainable drainage techniques to manage surface water and mitigate groundwater flood risks will be supported.</li> <li>ii. Development proposals that reduce the risk of flooding, either on site or to adjacent areas, will be supported.</li> <li>iii. Development proposals <del>that are</del> <u>should be</u> located in areas at the lowest risk of flooding in accordance with national and development plan standards <del>will be supported policies.</del></li> </ul>	HDC agrees with this recommendation. To accord with national policy and the NPPF. Amendments will ensure the CNP is in compliance with the basic conditions.	Modifications taken forward to the final plan.
Policy 2: Green Infrastructure	<p>Policy 2: Green Infrastructure</p> <ul style="list-style-type: none"> <li>i. Development proposals, which seek to conserve or enhance existing Green Infrastructure network will be supported.</li> <li>ii. Proposals that will deliver a net gain in Green Infrastructure will be supported.</li> <li>iii. Proposals that seek to improve access for pedestrians and cyclists through Green Infrastructure linkages will be supported.</li> </ul>	No change. HDC agree the policy meets the Basic Conditions.	No further action required

Policies	Examiner's Modifications (insertion underline, omission as strikethrough)	Decision and Reasoning	Action Taken
	<p>iv. Development proposals that would result in the loss of existing Green Infrastructure will not be supported unless it can be demonstrated that they secure new opportunities that:</p> <p>a) deliver an overall net gain in Green Infrastructure;</p> <p>b) incorporate provisions to deliver an equivalent carbon-sink capability in the short term; and</p> <p>c) deliver a net gain in Biodiversity.</p>		
Paragraph 4.7.6	<p>Chapter 4: Environment and Heritage</p> <p>Paragraph 4.7.6:</p> <p>The CNP seeks to both conserve and enhance existing Green Infrastructure assets and ensure new development contributes to the enhancement of this network. <u>The third part of the policy comments about proposals which would result in the loss of existing green infrastructure. In coming to judgement on any such proposals it is acknowledged that the District Council will need to reach a balanced decision based on the matters identified in this part of the policy. As part of this process, it will need to assess the existing value of the element of green infrastructure which would be lost if permission is granted for the development proposal.</u></p>	<p>HDC agrees with this recommendation. This will ensure compliance with the Basic Conditions.</p> <p>Editorial updates to the supporting text to ensure clarity and a balanced is achieved with regards to sustainable development.</p>	Modification to be taken forward to the final plan.
Policy 3: Local Green Space	<p>Policy 3: Local Green Space</p> <p>i. <del>The CNP designates the following locations as Local Green Spaces (as identified on the LGS Policies Map). Development proposals which conflict with the purpose of this designation will be resisted unless they</del> <u>Development proposals within the</u></p>	HDC agree with the Examiner's recommendation which ensure that the policy is in compliance with National Planning Policy	Modifications taken forward to the final plan.

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<p><u>designated local green spaces will only be supported in very special circumstances:</u></p> <p><u>LGS01 Bakers Shaw</u>  <u>LGS02 The Bowling Green</u>  <u>LGS03 Village Green</u>  <u>LGS04 Recreation Field</u>  <u>LGS05 Alley Groves Green</u>  <u>LGS06 Brook Hill Wood</u>  <u>LGS07 Brook Hill Strip</u>  <u>LGS08 Three Oaks Pond</u>  <u>LGS09 Alley Groves Pond</u>  <u>LGS10 Acorn Avenue Green</u>  <u>LGS11 Kicking Field</u>  <u>LGS12 Eastlands Wood (HDC TPO1520 – Mixed Woodland)</u>  <u>LGS13 Eastlands Lane (HDC TPO1519)</u></p> <p>a. <u>complement the purpose of the designation;</u>  b. <u>are ancillary to the use of the land for a public recreational purpose;</u>  c. <u>have a positive impact on the biodiversity of the designated area; or</u>  d. <u>are required to fulfil a statutory utility infrastructure purpose.</u></p>		
Chapter 4: Environment and Heritage	<p>Chapter 4: Environment and Heritage – Paragraph 4.8.3</p> <p>Paragraph 4.8.3:  Having regard to these criteria, it is considered that there are a number of green spaces in the parish that meet this test and merit special designation and protection. CPC have identified 13 areas within the parish where they wish to protect the special qualities of that area.</p>	HDC agree with the Examiner's recommendation to ensure that the scope of developments which impacts conservation areas is accurately	Modifications taken forward to the final plan.

Policies	Examiner's Modifications (insertion underline, omission as strikethrough)	Decision and Reasoning	Action Taken
	<p>Policy 4 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.</p>	reflected, and therefore that the policy meets National Policy requirements.	
Policy 4: Conservation Area	<p>Policy 4: Conservation Area</p> <p>i. Development proposals within or affecting the setting of the Cowfold Conservation Area will be supported where they preserve or enhance the character or appearance of the Conservation Area and comply with the requirements in policy 34 (Cultural and Heritage Assets) of the HDPF.</p> <p>ii. <del>Development proposals that safeguard the following features:</del></p> <ul style="list-style-type: none"> <li><del>a. St Peter's Church and surroundings</del></li> <li><del>b. Church Path cottages</del></li> <li><del>c. Margaret cottages</del></li> <li><del>d. St Peter's School</del></li> <li><del>e. The Gables, Huntscroft and Oakfield cottages</del></li> <li><del>f. Fairfield Court</del></li> <li><del>g. The Village Hall</del></li> <li><del>h. The Street</del></li> <li><del>i. Brook Hill</del></li> <li><del>j. Potters Green</del></li> </ul> <p><del>will be supported where such proposals would conserve or enhance the specific part of the Conservation Area and its immediate setting.</del></p>	HDC agree with the Examiner's recommendation to ensure that the scope of developments which impacts conservation areas is accurately reflected, and therefore that the policy meets National Policy requirements.	Modifications taken forward to the final plan.

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
Chapter 4: Environment and Heritage	<p>Chapter 4: Environment and Heritage – Paragraph 4.9.9</p> <p>Paragraph 4.9.9: CNP seeks to protect the Conservation Area by ensuring that proposals within the area or its setting are appropriate in nature and scale.</p> <p><u>Development proposals that safeguard the following features:</u></p> <ul style="list-style-type: none"> <li>k. <u>St Peter's Church and surroundings</u></li> <li>l. <u>Church Path cottages</u></li> <li>m. <u>Margaret cottages</u></li> <li>n. <u>St Peter's School</u></li> <li>o. <u>The Gables, Huntscroft and Oakfield cottages</u></li> <li>p. <u>Fairfield Court</u></li> <li>q. <u>The Village Hall</u></li> <li>r. <u>The Street</u></li> <li>s. <u>Brook Hill</u></li> <li>t. <u>Potters Green</u></li> </ul> <p><u>will be supported where such proposals would conserve or enhance the specific part of the Conservation Area and its immediate setting.</u></p>	HDC agree with the Examiner's recommendation to ensure that the scope of developments which impacts conservation areas is accurately reflected, and therefore that the policy meets National Policy requirements.	Modifications taken forward to the final plan.
Policy 5: Open Space	<p>Policy 5: Open Space</p> <ul style="list-style-type: none"> <li>i. Development proposals <del>that</del> <u>should</u> provide a mix of high quality formal and informal open space to meet local needs <del>will be supported.</del></li> <li>ii. <del>Development proposals that result in a loss of open space will not be supported</del> <u>Development proposals should be designed and arranged to respect, and where practicable connect to, existing open spaces in their immediate locality.</u></li> </ul>	HDC agrees with this recommendation. This will ensure compliance with the Basic Conditions.	Modifications taken forward to the final plan.

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<p>iii. Development proposals including the replacement of open space will be supported where:</p> <ul style="list-style-type: none"> <li>a. equivalent (in quantitative and qualitative terms) or enhanced open space is provided to serve local needs; and</li> <li>b. the proposed replacement open space is made available before the loss of the existing.</li> </ul>		
Policy 6: Community Services and Facilities	<p>Policy 6: Community Services and Facilities</p> <ul style="list-style-type: none"> <li>i. Development proposals that result in the net loss of community services or facilities will not be supported <u>unless it can be demonstrated that the premises are not viable for community use.</u></li> <li>ii. Development proposals including the alteration and/or replacement of community services or facilities will be supported where: <ul style="list-style-type: none"> <li>a. they result in equivalent (in quantitative and qualitative terms) or enhanced services or facilities serving local needs;</li> <li>b. any replacement service or facility is made available before the closure of the existing one;</li> <li>c. any replacement service or facility is readily accessible by the community by non car modes of transport;</li> <li>d. where necessary there is safe and adequate vehicular access with sufficient parking to meet the needs of the users;</li> <li>e. there is no unacceptable adverse effect on any local amenity; and</li> </ul> </li> </ul>	<p>HDC agrees with this recommendation.</p> <p>Agreed modifications will Policy 6 is in compliance with the Basic Conditions.</p>	<p>Modifications taken forward to the final plan.</p>



Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<p>f. heritage assets and their setting are protected.</p> <p>iii. Development proposals that bring redundant buildings back into use for the benefit of the community will be supported <u>subject to conformity with other development plan policies.</u></p>		
Policy 7: Youth Facilities	<p>Policy 7: Youth Facilities</p> <p>i. Proposals to enhance or provide new facilities for the benefit of young people, including but not limited to, children's play areas, sporting facilities and youth club activities will be supported.</p>	No change. HDC agree the policy meets the Basic Conditions.	No further action required
Policy 8: Potters Allotments	<p>Policy 8: Potters Allotments</p> <p>i. Proposals for the development of the allotments at Potters (as identified on the Policies Map) will be supported where:</p> <ol style="list-style-type: none"> <li>the development is required for community use;</li> <li>equivalent (in quantitative and qualitative terms) or enhanced allotments are provided to serve local needs;</li> <li>the replacement allotments are located in close proximity to the existing; and</li> <li>the replacement allotments are made available for use at least one planting season before the loss of the existing.</li> </ol>	No change. HDC agree the policy meets the Basic Conditions.	No further action required
Policy 9: Residential Development Principles	<p>Policy 9: Residential Development Principles</p> <p>i. Residential Development proposals will be supported where they <u>are within the built-up area of Cowfold and:</u></p>	HDC agrees with this recommendation. This will ensure compliance with the HDPF and the Basic Conditions.	Modifications taken forward to the final plan.

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<ul style="list-style-type: none"> <li>a. are of a sympathetic scale, relating positively to the character, function and layout of the area;</li> <li>b. maintain appropriate distances between buildings to avoid unacceptable adverse impacts on existing facilities or amenity of adjacent residential properties;</li> <li>c. Incorporate the use of high quality building materials and finishes consistent with high thermal efficiency;</li> <li>d. are of a density that is appropriate to its location and has regard to current levels in the immediate area;</li> <li>e. are designed to account for the unavailability of mains gas; and</li> <li>f. Provide appropriate infrastructure to facilitate EV charging for car parking spaces without the need for further groundworks.</li> </ul>		
Policy 10: Windfall Housing	<p>Policy 10: Windfall Housing</p> <ul style="list-style-type: none"> <li>i. Development proposals, for residential development on unidentified sites within the defined built-up area boundary of Cowfold, will be supported subject to compliance with other development plan policies.</li> <li>ii. <u>All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. All proposals should look to be compliant with Policy 17: Water Neutrality</u></li> </ul>	<p>Additional HRA amendments incorporated requiring that the proposal meets the water neutrality requirements to ensure the plan is in compliance with the habitat regulations.</p> <p>.</p>	<p>No further action required. Modifications taken forward to the final plan.</p> <p>Policy 14 will be renumbered accordingly.</p>
Policy 11: Brook Hill, CNP01 – see Policies Map	Policy 11: Brook Hill, CNP01 – see Policies Map	HDC agree with the Examiner's recommendations.	Modifications taken forward to the final plan.

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<p>i. Development proposals for up to 35 residential units on land at Brook Hill, as shown on the Policies Map, will be supported where:</p> <ul style="list-style-type: none"> <li>a. the housing density reflects the character and setting of the site and its surroundings;</li> <li>b. proposals provide safe and suitable access for vehicles, cyclists and pedestrians;</li> <li>c. proposals provide traffic calming, as necessary, at the junction of the access with the A281;</li> <li>d. proposals protect the landscape character of the ridgeline along the northern boundary of the site;</li> <li>e. proposals allow for the retention and enhancement of existing mature trees and hedgerows within the setting of the site and its surroundings.</li> <li>f. proposals provide a robust soft landscape buffer to protect the character of the area, particularly on the western and open northern boundary of the housing area;</li> <li>g. there is no unacceptable adverse impact on the Bakers Shaw LGS;</li> <li>h. the amenity of all existing residential properties bordering the site is protected;</li> <li>i. proposals provide public open space, as detailed on the Policies Map, that is to be transferred to the ownership of the Parish Council or other specially created trust;</li> <li>j. proposals allow for a high quality, illuminated, all weather, non vehicular access to the existing PRow to the west of the site; and</li> </ul>	<p>Additional HRA amendments also incorporated requiring that the proposal meets the water neutrality requirements to ensure the plan is in compliance with the habitat regulations.</p>	<p>Editorial updates to renumber Policy criterion to ensure the policy is clear.</p>

Policies	Examiner's Modifications (insertion underline, omission as strikethrough)	Decision and Reasoning	Action Taken
	<p>k. <del>a mineral resource assessment is undertaken to ascertain whether economically viable mineral resources are present and whether extraction is practicable, as required by Policy M9 of the West Sussex Joint Minerals Local Plan; and</del></p> <p>l. <del>Provide a Transport assessment at the planning application stage.</del></p> <p>m. <u>All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. All proposals should look to be compliant with Policy 17: Water Neutrality.</u></p>		
Paragraph 6.7.6 and 6.7.7	<p>Paragraph 6.7.6: This site has good compliance to HDPF policy, has limited visibility from other village areas while being within 500m of key amenities. <del>However, only part of the site is listed in SHELAA as developable.</del> <u>Careful consideration needs to be given to the site's access to the A281 to reflect the topography of Brook Hill and to ensure safe access and egress for all modes of transport.</u> There is concern that the access to the A281, via a roundabout located on the brow of the hill, may not meet safety needs; the Highways Authority consider that due to the unbalanced traffic flows a roundabout junction is unlikely to be considered an appropriate access solution.</p> <p>Paragraph 6.7.7: The site is located on Flood Zone 1 agricultural land and has good conformance to HDPF policies, of particular note are policies 2, 3, 4, 25, 31, 35 and 40. The proposals preserve existing woodlands, trees and ponds. There are no undue impacts on heritage assets. The SHELAA December 2018 lists part of the site, SA083 as developable. SA076 is listed as not developable with concerns expressed regarding</p>	HDC agrees with this recommendation. This will ensure compliance with the Basic Conditions.	Modifications taken forward to the final plan.

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<p>the ridgeline; the proposals seek to address this. All key village facilities, with the exception of the public house, are located in the order of 800m or less of the site, thus providing good accessibility. Proposals include a landscape buffer to the west, separating the development from the existing woodland and planted buffer to the north providing visual containment. A substantial tract of land to the north of this buffer is proposed as community land. <u>As part of the planning application process a mineral resource assessment should be undertaken to ascertain whether economically viable mineral resources are present and whether extraction is practicable, as required by Policy M9 of the West Sussex Joint Minerals Local Plan. Similarly, a Transport assessment should be prepared to assess any specific impacts of the development of the site and any mitigation required.</u></p>		
<p>Policy 12: Potters, CNP03 – see Policies Map</p>	<p>Policy 12: Potters, CNP03 – see Policies Map</p> <ul style="list-style-type: none"> <li>i. Development proposals for up to 35 residential units on land at Potters, as shown on the Policies Map, will be supported where: <ul style="list-style-type: none"> <li>a. the housing density reflects the character and setting of the site;</li> <li>b. proposals provide safe and suitable access for vehicles, cyclists and pedestrians;</li> <li>c. proposals provide for traffic calming at the junction of the access with the A272;</li> <li>d. proposals include a safe and accessible 'drop-off' point to serve the adjacent school and children's nursery including an associated high-quality, illuminated, all-weather non-vehicular access from the drop off point to the school and nursery;</li> </ul> </li> </ul>	<p>HDC agree with the Examiner's recommendations.</p> <p>Additional HRA amendments also incorporated requiring that the proposal meets the water neutrality requirements to ensure the plan is in compliance with the habitat regulations.</p>	<p>Modifications taken forward to the final plan.</p> <p>Editorial updates to renumber Policy criterion to ensure the policy is clear.</p>

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<ul style="list-style-type: none"> <li>e. proposals allow for the retention and enhancement of existing mature trees and hedgerows within and around the edge of the site;</li> <li>f. proposals provide a robust soft landscape buffer to protect the character of the area, particularly on the western and southern boundary of the housing area;</li> <li>g. the amenity of all existing residential properties bordering the site is protected;</li> <li>h. proposals provide appropriate children's play space to meet the needs of the development;</li> <li>i. proposals provide public open space, as detailed on the Policies Map, to be available for use as such, in perpetuity, for example, by transfer of the ownership to the Parish Council or other specially created trust; together with mechanism/commitments for ongoing management and maintenance to ensure that the space remains of a high quality;</li> <li>j. the layout results in a high quality frontage with the A272;</li> <li><del>k. a mineral resource assessment is undertaken to ascertain whether economically viable mineral resources are present and whether extraction is practicable, as required by Policy M9 of the West Sussex Joint Minerals Local Plan;</del></li> <li><del>t. provide a Transport Assessment at the planning application stage;</del></li> <li>k. the design of the development, including the layout of buildings and open spaces is demonstrably informed by an appropriate archaeological investigation to preserve and, where not possible, record in-situ remains;</li> </ul>		

Policies	Examiner's Modifications (insertion underline, omission as strikethrough)	Decision and Reasoning	Action Taken
	<p>l. the design, layout and form of the development preserves or enhances the character of a Conservation Area and the contribution made by its setting, and</p> <p>m. <u>All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. All proposals should look to be compliant with Policy 17: Water Neutrality</u></p>		
Paragraph 6.7.12	<p>Paragraph 6.7.12:</p> <p>The developer has agreed to incorporate an appropriate children's play space within the development boundary. <u>As part of the planning application process a mineral resource assessment should be undertaken to ascertain whether economically viable mineral resources are present and whether extraction is practicable, as required by Policy M9 of the West Sussex Joint Minerals Local Plan. Similarly, a Transport assessment should be prepared to assess any specific impacts of the development of the site and any mitigation required.</u></p>	HDC agrees with this recommendation. This will ensure compliance with the Basic Conditions.	Modifications taken forward to the final plan.
Policy 13: Housing Mix	<p>Policy 13: Housing Mix</p> <p>i. Development proposals, which include a mix of dwellings, types and sizes as indicated in the latest housing needs survey, will be supported.</p>	No change. HDC agree the policy meets the Basic Conditions.	No further action required.
Policy 14: Employment	<p>Policy 14: Employment</p> <p>i. Proposals that enable the development or enhancement of small-scale businesses will be supported where schemes are:</p> <p>a. within the built-up area boundary; <u>or</u></p>	HDC agree with the Examiner's recommendation.	Editorial updates to renumber Policy criterion to ensure the policy is clear.

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<p>b. contained within existing buildings; <u>or</u></p> <p>c. on previously developed sites;</p> <p>d. in appropriate sustainable rural locations.</p> <p>ii. Proposals for business development will be supported where:</p> <p>a. development does not involve the loss of dwellings; b. they are in keeping with the character and vitality of the local area; c. they safeguard local residential amenity; and d. they would not have an unacceptable effect on the local road network in terms of highway safety or residual cumulative impacts.</p> <p>iii. Development proposals that would result in the loss of any land, currently in business or other employment use, in the Parish will <del>be resisted</del> <u>not be supported</u> unless it can be demonstrated that business use is no longer viable.</p> <p>iv. <u>All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. All proposals should look to be compliant with Policy 17: Water Neutrality</u></p>	Additional HRA amendments also incorporated requiring that the proposal meets the water neutrality requirements to ensure the plan is in compliance with the habitat regulations.	Modifications taken forward to the final plan.
Policy 15: Communications	<p>Policy 15: Communications</p> <p>i. Proposals that would provide access to super-fast broadband networks to serve the Parish will be supported.</p> <p>ii. Proposals that would provide a high level of mobile/cellular infrastructure to serve the Parish will be supported.</p> <p>iii. Proposals that would provide underground ducting to facilitate future communication networks will be supported.</p>	No change. Policy meets the Basic Conditions.	No further action required.



Policies	Examiner's Modifications (insertion underline, omission as strikethrough)	Decision and Reasoning	Action Taken
	<p>iv. Proposals for above ground network installations that would provide access to either a super-fast broadband network or a mobile/cellular network will be supported where their location is sympathetically chosen and designed to respect the character of the local area.</p>		
Paragraph 7.3.3	<p>Chapter 7: Economy and Employment – Paragraph 7.3.3</p> <p>Paragraph 7.3.3: To facilitate employment within the Parish, in particular working from home, all dwellings and business premises within the Parish would benefit from super-fast broadband and a high level of mobile/cellular connectivity. <u>Policy 15 offers support offers support for a wide range of telecommunication equipment in a balanced way which takes account of appropriate environmental matters. Some of the works captured in the policy may benefit from permitted development rights.</u></p>	HDC agrees with this recommendation. This will ensure compliance with the Basic Conditions.	Modifications taken forward to the final plan.
Policy 16: Car Parking Provision	<p>Policy 16: Car Parking Provision</p> <p>i. <del>Residential development proposals that should provide off-street parking in accordance with the following minimum standards will be supported</del> <u>Residential development proposals should provide off-street parking in accordance with the following minimum standards:</u></p> <ul style="list-style-type: none"> <li>a. Residential 1 Bed dwellings; 2 spaces;</li> <li>b. Residential 2 Bed dwellings; 3 spaces; and</li> <li>c. Residential 3+ Bed dwellings; 4 or more spaces</li> </ul>	HDC agrees with this recommendation. This will ensure compliance with the Basic Conditions.	Modifications taken forward to the final plan. Editorial updates to renumber Policy criterion to ensure the policy is clear.

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<p>ii. Development proposals that demonstrate that off road parking provision is sufficient so as to minimise on-street parking will be supported.</p>		
Policy 17 Water Neutrality	<p><b><u>Policy 17: Water Neutrality</u></b></p> <p>1. <u>All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. This is to be achieved by ensuring that:</u></p> <p><b><u>Water Efficient Design</u></b></p> <p>a) <u>New residential development is designed to utilise no more than 85 litres of mains supplied water per person per day;</u></p> <p>b) <u>New non-domestic buildings to achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard or an equivalent standard set out in any future update; and</u></p> <p><b><u>Offsetting Water Use</u></b></p> <p>c) <u>Development proposals must demonstrate that having achieved water efficient design, any mains-supplied water use from the development is offset such that there is no net increase in mains-supplied water use within the WRZ compared with pre-development levels.</u></p> <p><b><u>Water Neutrality Statement</u></b></p> <p>2. <u>A water neutrality statement will be required to demonstrate how policy requirements have been met in relation to water efficient design and offsetting. The statement shall provide, as a minimum, the following:</u></p>	<p>New Policy 17 incorporated into the final neighbourhood plan document in light of additional Habitat Regulations Assessment (HRA) recommendations and to ensure compliance with Habitat Regulations 2017. This ensures that the that the plan meets the basic conditions.</p>	<p>HRA recommendation taken forward to include the requirement for any proposal to account for water neutrality and ensure the Policy and Plan is in compliance with the Habitat Regulations.</p>

Policies	Examiner's Modifications (insertion <u>underline</u> , omission as <del>strikethrough</del> )	Decision and Reasoning	Action Taken
	<p>a) <u>baseline information relating to existing water use within a development site;</u></p> <p>b) <u>full calculations relating to expected water use within a proposed development; and</u></p> <p>c) <u>full details of how any remaining water use will be offset.</u></p> <p><b>Offsetting Schemes</b></p> <p>3 <u>A local authority-led water offsetting scheme will be introduced to bring forward development and infrastructure supported by Local and Neighbourhood Plans. The authorities will manage access to the offsetting scheme to ensure that sufficient water capacity exists to accommodate planned growth within the plan period.</u></p> <p>4 <u>Development proposals are not required to utilise the local authority-led offsetting scheme and may bring forward their own offsetting schemes. Any such development proposals will need to have regard to the local authority-led offsetting scheme and associated documents.</u></p> <p>5 <u>Offsetting schemes can be located within any part of the Sussex North Water Resource Zone, with the exception that offsetting will not be accepted within the Bramber/Upper Beeding area identified in the Policies Map, unless the application site is located within the Bramber/Upper Beeding area.</u></p> <p><b>Alternative Water Supply</b></p> <p>6 <u>Where an alternative water supply is to be provided, the water neutrality statement will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The wider acceptability and certainty of delivery for alternative water supplies will be considered on a case-by-case basis.</u> <u>Area of Water Stress</u></p>		

Policies	Examiner's Modifications (insertion underline, omission as strikethrough)	Decision and Reasoning	Action Taken
	<p><b>Area of Water Stress</b></p> <p>7 <u>Should the need to demonstrate water neutrality no longer be required, new residential development must be designed to utilise no more than 110 litres of mains supplied water per person per day, as per the Building Regulations optional requirement for tighter water efficiency. For non-domestic buildings, the minimum standards for BREEAM 'Excellent' within the Water category will apply. Should tighter national standards be introduced during the Local Plan period applicable for areas of serious water stress, they will be applied.</u></p>		
Paragraph 8.10.3	<p>WSCC residential parking requirements are:</p> <ul style="list-style-type: none"> <li><del>• 1 bedroom dwellings; 1 space</del></li> <li><del>• 2&amp;3 bedroom dwellings; 2 spaces</del></li> <li><del>• 4 bedroom dwellings; 3 spaces</del></li> <li>• <u>1-bedroom dwellings 1.5 spaces</u></li> <li>• <u>2-bedroom dwellings 1.7 spaces</u></li> <li>• <u>3-bedroom dwellings 2.2 spaces</u></li> <li>• <u>4-bedroom dwellings 2.7 spaces</u></li> </ul> <p><u>These figures are based on the West Sussex County Council Guidance on Parking at New Developments (August 2019) as applied to locations identified within Zone 1. West Sussex data from the 2011 census indicates that 38.8% of households have 2 or more cars.</u></p>	HDC agrees with this recommendation. This will reflect evidence based guidance and comply with the Basic Conditions.	<p>Modification to be taken forward to the final plan.</p> <p>Editorial updates to renumber Policy criterion to ensure the policy is clear.</p>
Paragraph 10.4	<p><del>The CNP is prepared within the context of the overall development strategy set by Horsham District Council. At the current time, this is set out in the HDPF. A review of this plan is underway but is in its early stages. It is due to be completed by 2021. At that point, a new Development Plan will be in place, and this will become the key overarching document that will set the development strategy for the</del></p>	HDC agrees with this recommendation. This will ensure compliance with the Basic Conditions. Minor editorial updates have	Modifications taken forward to the final plan.

Policies	Examiner's Modifications (insertion underline, omission as strikethrough)	Decision and Reasoning	Action Taken
	<p><del>District up to 2036</del> The CNP is prepared within the context of the overall development strategy set by Horsham District Council. At the current time, this is set out in the HDPF. A review of this plan is expected. Section 9 of this Plan sets out the way in which a made neighbourhood plan will be monitored and then reviewed once any Local Plan review has been adopted.</p>	<p>been made to reflect the uncertainty as to the completion date of a local plan review following the Horsham District Local Plan Inspector's Interim Findings Letter.</p>	
Paragraph 10.4	<p>Within the context of the monitoring and review process it is acknowledged that HDC is preparing a revised development plan that will establish the overall growth strategy <del>up to 2036</del> beyond 2031. <del>This is due to be completed for the district by 2021.</del> CPC recognize that in light of this the housing numbers may change. <del>Acknowledging this potential change, the CNP is proposed to commence a review within 3 years of being made or following the adoption of the HDPF review, whichever is the later</del> In this context, the Parish Council will commence a review of the neighbourhood plan within no later than twelve months of the adoption of any review of the HDPF.</p>	<p>Minor editorial updates have been made to reflect the uncertainty as to the completion date of a local plan review following the Horsham District Local Plan Inspector's Interim Findings Letter.</p>	<p>Modifications taken forward to the final plan.</p>
Other Matters	<p>Other Matters – Specific</p> <p>Foreword – Third paragraph: Under the Localism Act 2011, Parish Councils and qualifying bodies have been given powers to deal with the local issues of planning and to inform planning authorities on these matters. The process began with the designation of the Neighbourhood Plan Area in May 2016 followed by a number of informal meetings. The first meeting of the CNPWG was not until October 2017.</p> <p>Seventh paragraph: In essence, to be considered sustainable most new developments should include the following: be located within easy walking distance</p>	<p>HDC agrees with these recommendations which reflected changes suggested to the Examiner by this Council. However, some updates and factual modifications are proposed to reflect the passage of time since the date of the examination and reflect the latest progress with Local Plan</p>	<p>Modification taken forward to the final plan.</p>

Policies	Examiner's Modifications (insertion underline, omission as strikethrough)	Decision and Reasoning	Action Taken
	<p>of the village facilities; not have any measurable negative impact on Air Quality or Biodiversity <u>unless adequate mitigation is secured through the planning process to compensate for such impacts</u>; and should provide groundwater management that reduces the risk of flooding within the development or to adjoining areas.</p> <p>Chapter 1: Introduction - Paragraph 1.1.3:  The <del>Pre-submission</del> <u>Submission</u> CNP has been prepared following extensive background work and public consultation. It has been prepared having regard to the Neighbourhood Planning (General) Regulations 2012, the National Planning Policy Framework (NPPF) and is in 'general conformity' with the District's adopted Development Plan Document, which includes the Horsham District Planning Framework (HDPF).</p> <p>Paragraph 1.1.5:  The CNP sets out the policies that will influence development, the development principles and the allocation of land for housing and designation of Local Green Space. Where important issues for the Parish cannot be featured as Policies they have been included as Aims ensuring that all issues of importance to the residents are included. <u>The Aims within the Plan will not become part of the development plan. Nevertheless, they will form the basis for the Parish Council to work with other bodies to secure their ambitions within the Plan period. The various land use policies and the associated Aims are included within each of the themed chapters of the plan. They are distinguished by the use of separate colours.</u></p> <p>Paragraph 1.2.4:  The HDPF sets out the strategic policies, which the CNP must be in conformity with. It sets out the planning strategy for Horsham District</p>	<p>preparation. This will ensure compliance with the Basic Conditions and makes consequential updates following the Examination of the plan.</p>	

Policies	Examiner's Modifications (insertion underline, omission as strikethrough)	Decision and Reasoning	Action Taken
	<p>(excluding South Downs National Park) to deliver the social, economic and environmental needs of the Plan area up to 2031. It sets out the policy framework and seeks to facilitate the delivery of 16,000 new homes over the plan period of which “at least” 1500 are to be delivered across the district through neighbourhood planning. <u>The District Council will look to start a new Local Plan review which will eventually replace the HDPF-</u></p> <p>Policies Map Introduce an appropriate key to each of the Policies Maps</p> <p>Modification of general text (where necessary) to achieve consistency with the modified policies.</p>		
Paragraph 1.2.2	<p>The Government, through the Paragraph NPPF Paragraph 30 (<del>Revised Feb. 2019</del> 2024), advises: “Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”.</p>	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.
Paragraph 1.3.10	<p>Public Consultation on the Regulation 14 Pre-Submission took place between August 19th and October 14th 2019 with a further period between November 12th and December 24th 2019 as a result of an administrative omission. Following a review of the representations received, the Submission CNP has been prepared in accordance with the Neighbourhood Planning (General) Regulations 2012 and in “general conformity” with the strategic policies of the HDPF. <u>These various matters are captured in the submitted Consultation Statement.</u></p>	HDC agrees with this recommendation. This will reflect evidence based guidance and comply with the Basic Conditions.	Modification taken forward to the final plan.

Paragraph 2.2.6:	Cowfold is one of only two locations in West Sussex where an Air Quality Management Scheme is in operation; <del>the data gathered, over a number of years, confirms that the village centre exceeds the annual mean objective for Nitrogen Dioxide.</del> There has been no significant downward trend despite the introduction of the latest generation of cleaner HGVs, cleaner diesel cars and following the introduction of electric vehicles.	HDC agrees with this recommendation. This will reflect evidence based guidance and comply with the Basic Conditions.	Modification taken forward to the final plan.
Paragraph 4.2.1	Air Quality Management Areas are designated by local authorities <del>because they are not likely to achieve national air quality objectives by the relevant deadlines</del> <u>do not comply with national air quality objectives.</u>	HDC agrees with this recommendation. This will reflect evidence based guidance and comply with the Basic Conditions.	Modification taken forward to the final plan.
Paragraph 4.7.3	The NPPF <u>2024 (Annex 2)</u> defines Green Infrastructure as a “A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.”	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.
Paragraph 4.8.2	The <u>NPPF 2024 (Paragraph 107)</u> notes that “The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.”	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.



Paragraph 4.9.2	Heritage Assets are defined in the NPPF 2024 (Annex 2) as <u>“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”</u>	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.
Paragraph 5.2.1	Open Space is defined in the NPPF 2024 (Annex 2) as <u>“all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.”</u>	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.
Paragraph 6.6.1 –	Paragraph 6.6.1 The NPPF 2024 (Annex 2) defines windfall development as “sites not specifically identified in the development plan”.	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.

Paragraph 6.6.2	Paragraph <del>68</del> <u>73</u> of the NPPF acknowledges small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. In order to promote the development of a good mix of sites Local Planning Authorities should “support the development of windfall sites through their policies and decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes”.	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.
Paragraph 8.1	<p>The NPPF <u>2024</u> notes within paragraph <del>102</del> 109 that:</p> <p>Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated; e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and <u>f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.</u></p>	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.

Paragraph 8.10.1	The NPPF <del>2024</del> paragraph <del>105</del> <u>112</u> states that “if setting local car parking standards for residential and non-residential development, policies should take into account:	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.
Paragraph 9.9.2	To meet the legal requirements placed on us, any Neighbourhood Plan that is not yet made must be able to show that it will not have a negative impact on the protected sites in the Arun Valley. Without considering Water Neutrality, any neighbourhood plan that reaches this late stage in the process would not meet the Basic Conditions. <del>It should be noted further modifications made and agreed to Strategic Policy 9 in the HDLP as a result of the Local Plan Examination will be considered as the primary policy and should be considered as such when addressing issues relating to Water Neutrality.</del> It follows: All development within the Cowfold Neighbourhood Plan area will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. Cowfold Neighbourhood Plan is fully supportive in the implementation of water neutrality policies <del>which are in alignment with the Horsham District Local Plan (2023-2024) in order to protect the Arun Valley SAC/RAMSAR.</del> All proposals should look to be compliant with Policy 17: Water Neutrality.	Paragraph referring to emerging Horsham District Local Plan water neutrality policies. These have been replaced by those in the Neighbourhood Plan, and there is also uncertainty as to the date by which a Local Plan will be adopted. Amendment made to reflect this position.	Modification taken forward to the final plan.

Glossary	NPPF: National Planning Policy Framework, Revised February 2019. 2024	Amendment made to reflect the latest version of the NPPF 2024.	Modification taken forward to the final plan.
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