



SLAUGHAM PARISH COUNCIL

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Dear Mr Ashcroft

Slaugham Parish Council response to Examiner's Clarification Note

I write in response to your Clarification Note (CN), which was received via Mid Sussex District Council (MSDC), on 22nd January 2019. I set out below Slaugham Parish Council's (SPC's) response to each point of clarification raised. For ease of reference, I first set out the matter raised, followed by the response of SPC. This follows the order of the CN.

General

Examiner point of clarification a): *Should I conclude that the policies are designed to be land use policies (that will be part of the Development Plan in the event that the Plan is made) and that the Aims are designed not to be land use policies (that will not form part of the Development Plan)?*

SPC response (a): In line with National Planning Policy Guidance, planning policies in the Submission Version Slaugham Neighbourhood Plan (SNP) would be used by MSDC in the determination of planning applications in the parish in the event the SNP is 'made' by MSDC.

SPC consider the Aims of the Submission SNP are an important part of the Plan, and are included to reflect the aspirations of the residents and to demonstrate SPC's support for these matters.

Where matters for e.g. improvements to the transport network, lie outside the scope of policies of the SNP, such as where they are reliant on other organisations, these matters are included as Aims.

Public consultation has confirmed matters addressed through the Aims included in the Submission SNP are: important to residents of the parish; supported by SPC; and therefore comprise part of the SNP.

Examiner point of clarification (b): *Most of the Aims follow this format. However, numbers 1 and 2 could be read as policies. Does the Parish Council have any comments on this observation?*

SPC response (b): The Regulation 14 Pre-submission SNP, included "Preventing Coalescence: Pease Pottage Gap," as a planning policy. ¹

The Regulation 14 Pre-submission SNP consultation took place in November 2017. At this time, the adopted Development Plan of the District was the Mid Sussex Local Plan (MSLP).

¹ See Policy 3: Preventing Coalescence: Pease Pottage, Slaugham Neighbourhood Plan, Pre-submission Plan, November 2017

Policy C2 of the MSLP identified a number of Strategic Gaps to be safeguarded; including between Crawley and Pease Pottage as an area to be safeguarded. The objective of the Strategic Gaps was to prevent coalescence and retain the separate identity and amenity of settlements.

In line with MSLP Policy C2, the Regulation 14 Pre-submission SNP set out that the area to the north of Pease Pottage was an important area to be generally kept free from development, in the long term, in order to secure the objectives of Strategic Gap (identified by MSDC). Policy 3 of the Regulation 14 Pre-submission SNP therefore sought to resist development within this area unless certain criteria were met.

Representations received, in response to the Regulation 14 Pre-submission SNP, raised objection to the inclusion of Policy 3: Preventing Coalescence: Pease Pottage Gap.² In response to representations received, the Neighbourhood Plan Working Group (NPWG) considered comments made and discussed whether:

- a) Any amendments were required to Policy 3 to address concerns raised;
- b) Any further evidence should be prepared to support the inclusion of Policy 3 within the Submission SNP;
- c) Policy 3 should be included in the Submission SNP as an Aim; and
- d) Policy 3 should be included in the Submission SNP unchanged.

In determining the best course of action, SPC were mindful that the previous policy tool (Policy C2 of the MSLP) had not been carried forward to the adopted MSDP. The adopted MSDP does not identify specific areas to be kept free from development. It does however seek to promote: well located and designed development; retain their separate identity and character; and prevent coalescence. In addition, it confirms Local Gaps can be identified in Neighbourhood Plans where this is supported by a robust evidence base.

The NPWG are aware that the preservation of settlement identity is of importance to the residents of the parish. In order to support the social objectives of the National Planning Policy Framework (NPPF) and in the interest of social cohesion, it was considered the objective to protect settlement identity and to preserve the amenity of the area between Crawley and Pease Pottage is justified and should form part of the SNP.

Following careful consideration, the NPWG resolved not to include “Preventing Coalescence: Pease Pottage Gap” as a land use policy. Given the importance of the objective to prevent coalescence it was however agreed the draft Submission SNP would include SPC’s aspiration to support the separate identity and amenity of Pease Pottage. The draft Submission Plan was therefore prepared on this basis.

The draft Submission SNP and associated documents were reviewed by MSDC prior to the formal submission of documents in November 2018. A meeting was held with MSDC Officers in July 2018 to discuss MSDC comments³ on the draft Submission documents.

² A summary of representations received are available to view in the Consultation Statement

³ MSDC comments are available in Appendix 10 of the Consultation Statement

MSDC provided comments on Aim 1: Preventing Coalescence: Pease Pottage Gap. MSDC recommended consideration was given to upgrading Aim 1 to a planning policy. MSDC advised that unless Aim 1 is included as a land use planning policy, MSDC would be unable to rely on Aim 1 to determine planning application(s) in the area. In light of this, MSDC expressed a preference for Aim 1 to be included as a planning policy.

Furthermore, MSDC advised that if Aim 1 was included as a planning policy, it should be supported by a background paper to justify the inclusion/extent of the Gap. In addition, MSDC advised the background paper should take account of: sites in the area which have been identified in MSDC's Strategic Housing and Economic Land Availability Assessment (SHELAA); and the effect of recent planning permission/development within the area.

Following the meeting with MSDC, the NPWG considered whether to:

1. Upgrade the Aim to a planning policy and prepare a background paper to justify the identification of a 'Gap';
2. Upgrade the Aim to a planning policy without a supporting background paper;
3. Continue to include the Aim within the Submission SNP; or
4. Delete the Aim.

Following discussion, and for the reasons set out above, the NPWG resolved to include Aim 1: Preventing Coalescence: Pease Pottage Gap, within the Submission SNP without a supporting background paper. The Submission SNP was finalised on this basis.

As highlighted by the Examiner, it is acknowledged the wording of the Aim could be read as a planning policy. In order to ensure consistency with the wording of other Aims in the Submission SNP, the opening sentence of Aim 1: Preventing Coalescence: Pease Pottage Gap, could be amended to read:

“SPC will not support development within the Gap (as defined on the Proposals Map) unless ...”

Aim 2: Preserving Settlement Identity has been included in both the Pre-submission and Submission SNP as an Aim.

SPC resolved to include the Aim within the SNP, as a direct response to feedback received locally to retain the separate identities between the four villages in the parish.

The Aim seeks to protect the areas between the four villages and does not identify specific areas to be protected. SPC consider the overall objective of the Aim is justified and wish the Submission SNP to set out SPC's support to protect the areas between the settlements from development where it individually or cumulatively results in the coalescence and loss of separate identity between the four villages.

It is considered the Aim reflects the community's aspiration for these areas to be protected. The objective of the Aim positively contributes to the social objectives of the National Planning Policy Framework (NPPF).

SPC have sought to phrase Aim 2 so it would not be mistakenly read as a planning policy. The wording of Aim 2: Preserving Settlement Identity, is consistent with other Aims in the Submission SNP.

Policy 1: Protecting the Area of Outstanding Natural Beauty and Policy 2: Protection of the Landscape

Examiner point of clarification (a): *I understand that the AONB extend throughout the AONB? ⁴ In any event should the AONB be shown on the Proposals Map? Otherwise the policy is difficult to apply/understand.*

SPC response: The vast majority of the parish (99%) ⁵ lies within the High Weald AONB. SPC agree the Proposals Map should illustrate the extent of the AONB in the parish. MSDC prepared the Proposals Map and have confirmed they will update the Referendum version of the Proposals Map to include this designation.

Policy 6: Conservation Areas

Examiner point of clarification (a): *I can see that the identified locations in the second part of the policy have a linkage to the supporting text. However, should the supporting text be more explicit about why these features have been identified?*

SPC response (a): The supporting text of Policy 6: Conservation Area, sets out some of the key characteristics of the 3 designated Conservation Areas. The reasoning for setting out these characteristics is to identify their local significance and to confirm SPC consider these heritage assets, in line with the NPPF, should be conserved in an appropriate manner.

SPC would welcome the opportunity to include additional supporting text to clearly set out why these features have been identified. Additional supporting text could read:

SPC recognise the importance of the parish's heritage assets and the positive contribution they make to the local environment. SPC wish to sustain and enhance the parish's historic environment through the positive management of development in the areas identified above. SPC therefore support the protection of these assets to ensure they can be enjoyed by residents and visitors to the parish.

Examiner point of clarification (b): *Is the second half of the policy suggesting that the five identified areas are those particularly worthy of special protection and/or where the greatest sensitivity to new development is to be found?*

As drafted the policy could be read as one which encourages development in these areas.

SPC response (b): Policy 6: Conservation Areas, has identified five particular areas as it is considered these are of local importance and should be conserved in an appropriate manner.

The policy seeks to support development proposals which respect the heritage assets of these local areas. The policy is not seeking to encourage development in these areas.

⁴ MSDC have advised the final word of the sentence should read 'parish'

⁵ Parish size area=2,432 hectare. Area outside of AONB=19.3hectare

SPC wish particular regard to be had to the five features listed in the policy, as these are considered important features which positively contribute to the character of the Conservation Areas.

SPC would welcome the opportunity to clarify the policy is not seeking to encourage development in these areas.

It is respectfully submitted that the policy could be updated to read:

“... Development proposals, which respect, the following key features:

1. *St.Mary’s Church, Slaugham;*
2. *The Street (Park Road), Slaugham;*
3. *Slaugham Place;*
4. *The Street Warninglid; and*
5. *High Street, Handcross*

will be supported where development proposals protect, preserve and/or enhance the heritage asset and its setting.”

Policy 11: St. Martin Close (East)

Examiner point of clarification (a): *Has the Parish Council undertaken any detailed analysis of the capacity of the local highway network (in Covert Mead/West Park Road/St Martin Close) to accommodate 30 additional dwellings?*

SPC response (a): SPC have not commissioned their own detailed analysis of the capacity of the local highway network (in Covert Mead/West Park Road/St Martin Close) to accommodate 30 additional dwellings.

Both Highways England and West Sussex County Council (WSCC) were directly consulted on the Regulation 14 Pre-Submission SNP ⁶ to seek their view on the proposed allocations.

Highways England did not object to the proposed allocations and advised “*as these sites are remote from the M23 Junction 11 at Pease Pottage, within the broader operation, they are unlikely to have a significant impact on the Strategic Road Network.*”

With respect to the proposed allocations, WSCC advised:

“The overall level of development proposed in the Slaugham Neighbourhood Plan is in accordance with the forecast estimate of background traffic growth assumed in the Strategic Transport Assessment. The Strategic Transport Assessment indicates that there will be no severe impacts on the transport network that cannot be mitigated to a satisfactory level. The County Council considers that this provides sufficient evidence to justify the level of development proposed in the Slaugham Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for Slaugham.”

⁶ A summary of representations received are available in the Consultation Statement

In light of the above comments from the statutory bodies, no detailed analysis of the capacity of the local highway network was deemed necessary following the Regulation 14 Pre-submission consultation.

For ease, WSCC's response to the Submission SNP is set out below:

"Given that the submitted Slaugham Neighbourhood Plan (SNP) includes the proposed allocation of small-scale housing, it should be noted that this will be subject to the resolution of any highway safety and access issues at the planning application stage, or as part of a consultation on a Community Right to Build Order."

It is respectfully submitted that the above response, demonstrates WSCC do not consider any further detailed analysis is required at this stage.

Examiner point of clarification (b): *What is the current status of St Martin Close East? It has the appearance of informal open space.*

SPC response (b): SPC consider that the current land use of St. Martin Close (East) comprises grassland/scrubland with a north/south tree belt on the western side of the site.⁷

Land at St.Martin Close (East) was gifted to SPC as part of the development of St.Martin Close for the construction of 20 low-cost dwellings (SV/038/96). Planning permission was granted in Decision Notice, dated 05 February 1999.

The associated S106 advises, *the Proposed Open Space [i.e land known as St.Martin Close (East)] shall not be used for any purpose other than as public open space and no buildings or other structures or erections shall be constructed or placed thereon without the Council's prior written approval...."*

SPC are not aware of any reasons which would prohibit MSDC giving approval for the land to be allocated for residential development through the SNP. The land has not formally been identified as open space by MSDC as part of a higher tier document/evidence base document. SPC will continue to work with MSDC to secure the release of the land.

An outdoor play space is available on the western side of West Park Road. It is considered this play space provides a local facility for nearby residents.

The Land Registry details of land at St.Martins Close (East), details restrictions relating to the land. Restriction no.2 states:

"Not to use or cause or permit the Property to be used other than for an open space without the consent in writing of the Transferor and no Buildings are to be erected on the land without the consent in writing of the Transferor."

In light of this restriction, SPC have continually engaged with the Transferor, whose retained land benefits from this covenant, to keep them abreast of SNP preparation and SPC's aspiration to develop the site for residential uses. SPC informed them of public consultation events and invited representations at the Regulation 14-Pre-submission consultation stage.

⁷ Current land use of site is detailed in the Parish Housing Land Availability Assessment, see Appendix 4 of the Consultation Statement

There is an informal understanding between SPC and the Transferor, that where the site is allocated for residential development as part of the SNP, the Transferor will agree to have the covenant removed from the land.

Since the grant of planning permission, the land has been left as grassland/scrubland. As a gesture of good will, for the benefit of existing residents, SPC currently informally manage the area immediately fronting St. Martin Close (east).

With respect to the provision of open space on land at St.Martin Close (east), SPC consider the proposed allocation can positively accommodate open space which would benefit future users of the site. It is envisaged open space could be provided which connects with existing open space(s) in the surrounding area. It is considered such connected provision could provide health and recreation benefits for existing and future users of the site. In addition, SPC consider open space could provide community focussed benefits which provide social benefits. SPC consider the provision of such high quality open space is an important element in achieving sustainable development.

The evidence base of the Community Right to Build Order No.1 (2013) included illustrative Masterplans. The illustrative Masterplan depicts how open space could be provided at St.Martin Close (figure 11) and how it was envisaged St.Martin Close could be linked to the outdoor play space on the western side of West Park Road (key legend 9 on Illustrative Masterplan). The enclosed Concept Plan-2012 also illustrates how it was envisaged open space could be provided at St.Martin Close.

The masterplanning work undertaken confirms how SPC envisage the open space could be integrated holistically as part of the development of St.Martin Close (east). SPC consider the development could positively provide high quality open space which could provide access and opportunities for recreational activity. In addition it is considered the provision of open space could also provide visual amenity.

For the avoidance of doubt, the enclosed Concept Plan and Masterplan are provided for reference purposes only and to demonstrate that SPC have always envisaged open space being provided at St.Martin Close. No masterplanning work has been undertaken as part of the preparation of the Submission SNP (November 2018).

Should the Examiner consider it appropriate, SPC would welcome a recommendation for the policy to include: an additional criteria for open space to be provided as part of the proposed development of the site; and for the open space to be accessible by footpath from the existing children's play area. If considered appropriate an additional criterion could read:

“The Neighbourhood Development Plan requires the provision of a new public open space as part of the implementation of the housing allocations at St. Martins Close (East and West) and this where possible should be accessible by footpath from the existing children's play area.”

Policy 12: St. Martin Close (West)

Examiner point of clarification (a): *I can see the proposed phasing approach taken between the two St Martin Close sites. Is the phased approach linked to the current uncertainty on strategic housing delivery?*

SPC response (a):

Mid Sussex District Plan

The MSDP was adopted in March 2018, following the Regulation 14 Pre-submission SNP consultation in November 2017.

The MSDP sets out the framework for the preparation of Neighbourhood Plans. MSDP Policy DP4: Housing, sets out how it is envisaged the minimum District housing requirement of 16,390 dwellings will be facilitated/delivered over the plan period 2014-2031. With respect to Neighbourhood Plans, the Policy confirms MSDC envisage 2,439 dwellings will be allocated through future Neighbourhood Plans and the Site Allocations document.

MSDP Policy DP4: Housing also sets out the spatial distribution of the housing requirement, by reference to a settlement hierarchy. Of those settlements within Slaugham Parish, Handcross and Pease Pottage are identified as a Category 3 settlement, whilst Slaugham and Warninglid are identified as a Category 4 settlement.

A table within the policy sets out that there is a requirement for Category 3 settlements to collectively contribute a minimum of 311 additional dwellings and for Category 4 settlements to deliver a minimum 19 additional dwellings through future allocations (i.e. to contribute to the 2,439 dwellings).

MSDP Policy DP6: Settlement Hierarchy, sets out the settlement hierarchy of the District. With respect to Slaugham, Handcross and Pease Pottage are identified as Category 3 settlements whilst Slaugham and Warninglid are identified as Category 4 settlements.

Category 3 settlements are *“medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often sharing with neighbouring settlements.”*

Category 4 settlements are *“small villages with limited services often only serving the settlement itself.”*

Of those settlements identified as Category 3 or 4 within the district 11 are located within the High Weald AONB, 2 adjoin or are partly surrounded by the AONB, and 5 are outside of this landscape designation. It is therefore clear, that the spatial distribution of further housing set out in MSDP DP4: Housing, anticipates some additional development will be located within the High Weald AONB.

The supporting text of MSDP Policy DP6 provides clarity between the District Council housing requirement and the role of individual Neighbourhood Plan in meeting the housing requirement of 2,439. With respect to the settlements of Slaugham Parish, no minimum residual housing requirement from 2017 onwards was identified. A footnote to the table confirmed “the required minimum provision at Pease Pottage (Slaugham Parish) is significantly greater than other settlements within Category 3 due to the allocation and subsequent permission granted for 600 homes within this settlement. Due to this, the other settlements within Slaugham Parish (Handcross, Slaugham and Warninglid) will not be required to identify further growth through the Plan process on top of windfall growth although may wish to do so to boost supply.”

The MSDP confirms MSDC will prepare a Site Allocations Development Plan Document (DPD). This will allocate non-strategic and strategic sites of any size over five dwellings (with no upper limit), in order to meet the remaining housing requirement over the rest of the Plan period as reflected in the 'stepped trajectory' of the MSDP. Furthermore, it confirms MSDC intends to undertake a review of the MSDP after the adoption of the Site Allocations DPD. This will reconsider need and allocate further dwellings if required. MSDC envisage this will be submitted to the Secretary of State in 2023.

Slaugham Parish Housing Need

As part of the preparation of the SNP, SPC undertook a Housing Needs Consideration Assessment in December 2016.⁸ This Assessment applied different methodologies to calculate local housing need, reliant upon data from a variety of sources, including the Office for National Statistics.

The Assessment provided a range of housing figures for growth of the parish over the Plan period. Based on the results of the Assessment, SPC resolved that the local housing need over the Plan period is 270-310 dwellings.

As part of this work, a review of planning permissions and completions in the parish was undertaken. This confirmed a total of circa 284 dwellings, excluding the strategic allocation, had been permitted and completed in the parish since 2014. Of the 284 dwellings granted permission/completed in the parish since April 2014, 146 dwellings⁹ have been granted permission/completed in Pease Pottage.

In light of the above context SPC considered whether modest housing growth should be facilitated within the SNP through modest land allocations for housing development. In line with the NPPF, paragraph 59, SPC wish to support the Government's objective to boost the supply of homes. SPC agree *"it is important that a sufficient amount and variety of land can come forward where it is needed..."*

The strategic policies of the MSDP seek additional housing allocations to deliver further growth over the Plan period. The MSDP confirms, some of this housing should be delivered in and around Category 3 settlements (that includes Handcross and Pease Pottage) and Category 4 settlements (that includes Slaugham and Warninglid).

Given the strategic allocation at Pease Pottage, will meet some of the needs of Crawley (as well the needs of the Northern West Sussex Housing Market Area), rather than meet the specific needs of the parish, and in light of the MSDP making clear that further growth within the parish would be supported in order to 'boost supply', SPC resolved further modest growth should be accommodated in the Parish in order to boost the supply of homes.

SPC considered that the modest additional housing growth could both contribute to the minimum residual housing need set out in Policy DP4: Housing, and the housing need within the parish, specifically beyond Pease Pottage. Furthermore it was considered modest growth would contribute to sustaining the services and facilities of the parish that are beyond this settlement and maintain the vitality of the local area.

⁸ See Appendix 3 of the Consultation Statement

⁹ 12/02128/FUL and 13/02994/OUT

Site Selection

SPC considered the sustainability of settlements within the parish with reference to the settlement hierarchy of the MSDP.

Integral to the preparation of the SNP was an appraisal of all known candidate housing sites. This comprised a detailed assessment of the constraints and opportunities of each candidate housing site, including landscape sensitivity.

In addition, the SNP is supported by a Sustainability Appraisal. This includes an assessment of each candidate housing site against the sustainability framework objectives.

Almost all of the parish lies within the designated High Weald AONB. On this basis, additional housing beyond the built-up area boundaries would entail development within this landscape designation. However, land within the parish is not all of equal landscape, quality, character or sensitivity. This is acknowledged by the District Plan Inspector in respect of his comments regarding the allocation of 600 dwellings at Pease Pottage.¹⁰

The detailed and considered assessment of candidate housing sites demonstrated that St. Martin Close (East) and St. Martin Close (West), on balance offer the most sustainable location for development to serve the needs of Handcross, and the wider parish. Both sites, in absolute and relative terms are comparatively of lesser landscape importance and sensitivity. The sites are both visually well contained in short and long range views, and are constrained by and relate well to the existing built-up area of Handcross.

Proposed allocation(s)

The Submission SNP proposes to allocate St. Martin Close (East) for up to 30 residential dwellings. In addition, the Submission SNP proposes to allocate St. Martin Close (West) as a reserve site, to come forward, if needed, in the second part of the SNP period, following the delivery of St. Martin Close (East).

In considering whether the SNP should propose a reserve site for allocation, SPC had regard to the planned review of the MSDP. Given the emerging changes to the NPPF, with respect to the proposed standard methodology to calculating housing need, it was considered these factors may result in amendments to the MSDP policies, requiring parishes to provide more housing.

SPC consider the development of the sites, in the interest of good planning, should follow a sequential approach with St. Martin Close (East) to be developed prior to development commencing on St. Martin Close (West).

It is considered St. Martin Close (West) is more visually separated from the existing residential dwellings of St. Martin Close and therefore (when required) should follow the development of St. Martin Close (East).

Policy 11: St. Martin Close (East) requires proposals to enable future vehicular and pedestrian access to St. Martin Close (West). It is considered this approach would ensure St. Martin Close (West) would come forward following the delivery of land at St. Martin Close (East).

¹⁰ See paragraph 52 of the Inspector's Report of March 2018

SPC consider the proposed allocation of St.Martin Close (East) will enable the SNP to facilitate growth in the parish and positively contribute to the requirements of MSDP Policy DP4..

In addition, the proposed allocation of St.Martin Close (West) as a reserve site, will contribute to future additional housing need, as may be determined through future District DPD's. These documents will be prepared in accordance with the requirements of the NPPF, including the standard methodology.

It is therefore considered the proposed allocation at St.Martin Close (West) will help to minimise the requirement for the parish from having to undertake an early review of the SNP.

Examiner point of clarification (b): *Paragraph 6.24 is clear that the West site is a reserve site. However, Policy 12 simply links support for the West site to the commencement of work on the East site.*

The Parish Council's observations on this observation would be helpful.

SPC response (b): As set out above, the Submission SNP proposes to allocate St. Martin Close (West) as a reserve site to ensure future local housing need of the parish can be met over the Plan period.

As highlighted in the CN, Policy 12: St. Martin Close (West) seeks to support development proposals following the commencement of St. Martin Close (East). The supporting text of the policy sets out the reasons for this approach.

Should the Examiner support the proposed approach of Policy 12: St.Martin Close (West), the policy could be updated to clarify, when the development of St. Martin Close (West) would be supported.

SPC respectfully submit Policy 12: St. Martin Close could be updated to read:

"Following the delivery of St. Martin Close (East), development proposals for up to 35 residential units on land at St. Martin Close (West) will be supported, where additional housing need is identified in the Parish through the Site Allocation Document and/or MSDP review. Development proposals will be supported where ..."

Examiner point of clarification (c): *What is the current status of St. Martin Close West? It has the appearance of informal recently planted woodland.*

SPC response (c): SPC consider that the current land use of St. Martin Close (West) is agricultural grassland. ¹¹

Policy 13: Residential Development within and Adjoining Settlement Boundaries

Examiner point of clarification (a): *I can see the built-up settlement boundaries on policies map. Are they available on a more detailed map?*

SPC response (a): The "Policies Inset Maps" of the MSDP illustrates the settlement boundaries of Pease Pottage; Handcross; and Warninglid, enclosed for ease of reference.

¹¹ Current land use of site is detailed in the Parish Housing Land Availability Assessment, see Appendix 4 of the Consultation Statement

Examiner point of clarification (b): *Are they identical to those in the MSDLP? If this is the case, does the Neighbourhood Plan policy add any local value to the Local Plan policy?*

SPC response (b): The SNP mirrors the settlement boundaries of Pease Pottage; Handcross; and Warninglid, as illustrated in the MSDP. The settlement boundaries are included to ensure the policy can be readily and easily understood, and in the determination of planning application(s).

It is considered Policy 13 of the Submission SNP provides a 'local flavour' and seeks to ensure development proposals within the built-up area of Handcross, Pease Pottage and Warninglid will be supported where specific criteria are met.

In reviewing the draft Submission SNP, MSDC recommended ¹² the policy, with respect to development proposals outside of the built-up area boundaries, be expanded to align with MSPD Policy 6: Settlement Hierarchy i.e. to provide clarity and avoid perceived conflict.

In light of the comments received from MSDC, Policy 13 of the Submission SNP was updated to reflect advice received, and to reflect the requirements of MSDP Policy 6.

Policy 15: Economic Development

Examiner point of clarification: *The policy is suitably supportive for economic development. The criteria-based approach is helpful and appropriate. However, has the Parish Council given any consideration to the definition of a 'sustainable location'?*

SPC response: As part of the preparation of the draft Submission SNP and in response to feedback received, SPC resolved to include a policy to enable the development of business uses within the parish.

In determining, the criteria to be included, SPC considered the definition of a "sustainable location" is one which is within or close to (within 800m) of the settlement boundaries of Pease Pottage and Handcross and/or readily accessible by non-car modes of transport.

It is acknowledged proposals may come forward in areas outside of these areas however, SPC's aspiration is to focus the majority of economic development uses in these 'sustainable locations.' Where proposals come forward in the more rural parts of the parish for e.g. the conversion of a barn for business use, proposals would not be considered unacceptable due to its location.

For clarity, a footnote could be included in the Policy to define "sustainable location", as detailed above, if deemed appropriate.

Paragraph 8.5

Examiner point of clarification: *The paragraph has missing words at its end. Please can you advise what was intended/is missing?*

SPC response: SPC confirm the incomplete sentence should read "The Parish Council wish to protect and enhance Public Rights of Way and where possible encourage additional **opportunities to provide new and/or improved Public Rights of Way.**"

Sustainability Appraisal

Examiner point of clarification: *Please can I see maps of the sites assessed in Appendix 2.*

¹² MSDC comments are available in Appendix 10 of the Consultation Statement

SPC response: A Map of the sites assessed, as detailed in Appendix 2 of the Sustainability Appraisal has been prepared by MSDC for the benefit of the Examiner.

Examiner point of clarification: *In the event that any of the sites identified in the developer representations are not directly addressed in the SA/SEA exercise (as set out in Appendix 2) were they:*

- *considered as part of the exercise; and/or*
- *dismissed as reasonable alternatives.*

SPC response: As part of the preparation of the Regulation 14 Pre-submission SNP, SPC undertook a 'Call for Sites' in August 2015. In response to this Call for Sites, one additional site, previously unknown from other site sources was identified.

In addition and in line with National Planning Policy Guidance, SPC undertook an assessment of those sites within MSDC's Strategic Housing Land Availability Assessment (SHLAA). Where sites were excluded by the District Council in their SHLAA, these were excluded from assessment in the Parish Housing Land Availability Assessment (PHLAA). A total of 15 sites were assessed as part of the PHLAA.¹³

The Regulation 14 Pre-submission SNP underwent public consultation in November 2017. Appendix 2 of the the associated Regulation 14 Presubmission Sustainability Appraisal (incorporating Strategic Environmental Assessment) (SA) provided a housing sites options appraisal for each site assessed as part of the PHLAA.

In response to the public consultation, representations were received from a number of landowners/developers/agents. A summary of these representations are available in the Consultation Statement.¹⁴

The majority of representations from landowners/developers/agents were either in relation to sites assessed as part of the PHLAA/Appendix 2 of the SA and/or provided comments on the policies of the Pre-submission SNP.

The representations identified an additional two sites above those assessed as part of the Regulation 14 Pre-submission SA.

A representation was received from Thakeham Homes Ltd with respect to an amended area of land on Land to the West of Old Brighton Road, South Pease Pottage. The representation acknowledged the site was previously considered under reference SL08. In addition, the representation confirmed, the revised land parcel was submitted to MSDC in response to the District's 'Call for Sites' in October 2017. The representation requested the revised land parcel be reconsidered by SPC.

In addition, a representation was received from Star Planning and Development, with respect to Land to the west of London Road, Handcross. The representation confirmed, in paragraph 4:

¹³ See Appendix 4 of the Consultation Statement

¹⁴ See Consultation Statement and in particular page 9 for details

“For the Slaugham Neighbourhood Plan a Housing Land Availability Assessment (HLAA) has been prepared. However, this HLAA did not consider all the potential housing sites. This may be the fault of those with interests in various sites not realising that there was a ‘Call for Sites’ exercise. Indeed, this is what occurred in respect of the land west of London Road.”

In light of representations received, the above two sites were assessed as part of an updated PHLAA. A copy of the PHLAA Addendum is available to view in Appendix 4 of the Consultation Statement.

As part of the preparation of the draft Submission SNP, the above two sites were also tested as part of the draft Submission SA, see Appendix 2: Housing Site Options Appraisal.

MSDC have made a summary of representations received in response to the Submission Consultation available.

For ease, I set out below a table to confirm which landowners/developers/agents provided comment at Regulation 14, if a housing site was promoted, (and included for ease of reference is the SA reference); and if comments were received from landowners/developers/agents at the Regulation 16 consultation stage.

Table 1: Representations received from landowners/developers/agents

Regulation 14 Representation				Regulation 16 Representation	
<i>Developer/ Landowner</i>	<i>Comments provided at Reg 14</i>	<i>Site Promoted</i>	<i>SA Reference of Site</i>	<i>Comments provided at Reg 16</i>	<i>Brief Summary of Comments</i>
Barton Wilmore	Yes	Yes: Warren Field	SL09	Yes Comments received from Hallam Land Manage- ment on Warren Cottage Fields	Comments relate to suitability of SL09
Batchelor Monkhouse	Yes	Yes: Land at Coos Lane	SL10	Yes	Comments relate to appropriateness of SL10
Cottesmore Hotel and Country Club	Yes	Yes: Land north of Pease Pottage, west of Old Brighton Road	SL02	No	N/A

Regulation 14 Representation				Regulation 16 Representation	
DMH Stallard	Yes	Yes St. Martin Close (West)	SL13	Yes	Comments relate to St. Martin Close (West)
Genesis Town Planning	No reps received	No reps received	No reps received	Yes	Comments promote land West of Park Road - 65-80 dwellings Comments confirm the land was not promoted for development in previous 'Call for Sites'
Gladman	Yes	No	N/A	Yes	Comments relate to policies of SNP
PRP	Yes	No *interest in land at Golf House	SL04 - permission granted	No	N/A
Rural Solutions	Yes	No	N/A	Yes	Comments relate to policies of SNP
Savills	Yes	No *developing Land at Hoadlands, Handcross (DM/17/1331)	N/A	No	N/A
Star Planning and Development	Yes	Yes Land to the west of London Road Handcross	SL17	Yes	Comments promote Land to the west of London Road, Handcross, SL17
Thakeham	Yes	Yes Land to the West of Old Brighton Road, South Pease Pottage	SL16 (part of SL08)	Yes	Comments promote Land to the West of Old Brighton Road South (150 homes) SL08/SL16

Regulation 14 Representation				Regulation 16 Representation	
Turley	No reps received	No reps received	No reps received	Yes	Comments promote Land to the north of Horsham Road and West of Old Brighton Road North Pease Pottage

Table 1 confirms representations have been received from Genesis Town Planning and Turley to promote additional candidate sites for residential development in response to the Submission SNP consultation.

A review of MSDC's SHELAA, has been undertaken to confirm whether these sites form part of this Assessment. The SHELAA, April 2018, does not include: Land West of Park Road; and/or Land to the North of Horsham Road and West of Old Brighton Road North Pease Pottage.

These sites were not previously promoted to SPC and therefore until this point, no consideration has been given to the suitability/merits of the sites.

Examiner point of clarification: *In paragraph 5.10 the Assessment concludes that the identification of the two housing sites (policies 11/12) 'presents the most sustainable option for the parish as the sites with the least environmental effects have been allocated.'*

Please can the Parish Council expand on this explanation drawing on information in Appendix 2 of the Assessment.

SPC response: The SA seeks to consider the comparative sustainability merits and demerits of, amongst other things, candidate housing sites. Appendix 2 of the SA, provides a housing sites option appraisal. This demonstrates each site has been assessed against the Sustainability Objectives of the Framework. A comparative summary of each assessed site forms part of Appendix 2.

The SA includes an assessment of each candidate housing site against the sustainability framework objectives. This includes Objective 1 - Countryside 'to conserve and enhance the countryside areas of the parish.'

Almost all of the parish (99%) lies within the designated High Weald AONB. However, land within the parish is not all of equal landscape, quality, character or sensitivity. This is acknowledged by the District Plan Inspector in respect of his comments regarding the allocation of 600 dwellings at Pease Pottage.¹⁵

The detailed and considered assessment of candidate housing sites demonstrated that the candidate housing sites at St. Martins Close East and West, both in absolute and relative terms are of lesser landscape importance and sensitivity. The sites are both visually well contained in short and long range views, and are constrained by and relate well to the existing built-up area of

¹⁵ See paragraph 52 of the Inspector's Report of March 2018

Handcross. This is particularly true of St. Martins Close East, which has a close visual relationship with existing housing development.

It is considered that housing development on these sites can come forward without undue impact on the High Weald AONB. Furthermore, it is considered any impacts could be mitigated by a considered approach to the design of the development, the retention of existing mature trees and hedgerows around the boundary of the site, and additional soft landscaping.

For these reasons, it is considered that the allocations will not have harmful effect on the AONB, beyond the confines of the site. It is respectfully re-emphasised that the housing requirements and spatial distribution of development envisaged in the MSDP anticipated there would need to be some release of land within the AONB for housing, and this is reflected in the conclusions of the District Plan Inspector.

It is acknowledged the provision of housing will generally have a positive impact on the social and economic objectives of the Framework; whilst often having a negative impact on environmental objectives. This general impact on objectives is reflected in the individual assessments of the candidate housing sites contained in Appendix 2 of the SA.

As set out in Appendix 2, “reasonable alternatives” to the site’s allocated for housing have been assessed as part of the SA. The Assessment demonstrates these alternative sites are unsuitable and do not provide the positive environmental, social and/or economic benefits which the proposed allocation(s) of St.Martin Close would provide.

The alternative sites are all deemed to have an equivalent or greater negative impact on Objective 1: Conservation and/or enhancement of the rural character of the parish. All sites are located within the High Weald AONB. A number are either located in prominent landscape positions and/or are visually divorced from existing settlements. This includes sites such as SL01 and SL15. The alternative sites also have an equivalent or greater negative impact on Objective 2: Protection and/or enhancement of biodiversity. This is due, for example, to the potential impact on existing habitats, trees, etc. This includes sites such as SL06 and SL10.

The alternative sites also have an equivalent or greater negative impact on Objective 9: Promote sustainable and non-car modes of transport. This is due to their more remote location, or, in the case of those close to Pease Pottage, due to the settlement’s limited range of existing services and facilities. This includes sites such as SL01, SL02, SL03, SL06, SL07, SL08, SL15 and SL16.

In comparison, those sites located in and around Handcross, such as the allocated site(s), score more favourably against Objective 9, given the greater accessibility to services and facilities by sustainable and non-car modes of transport.

With respect to the economic objectives, the alternative sites have a neutral/positive impact on SA objectives.

The sites of St.Martin Close (east) and St.Martin Close (west) had generally positive impacts on the economic and social objectives. They also had comparatively modest impact on environmental objectives. On this basis, it was concluded that the allocation of these sites for housing would have an overall positive impact and would represent sustainable development.

Representations

Examiner query: *Does the Parish Council have any comments on the various representations received to the Submitted Plan?*

SPC response: In response to representations received SPC wish to clarify/confirm the following matters:

- The Mid Sussex District Plan (MSDP), allocates land to the east of Pease Pottage for approximately 600 new homes. As detailed in the MSDP14, it has been established through the Crawley Borough Local Plan Examination that the borough has a need to provide for about 5,000 additional homes during the period until 2030 which are not capable of being built within the town. This strategic allocation is to meet the needs of the Northern West Sussex Housing Market Area, including some of the unmet needs of the adjacent local authority at Crawley. The local housing need, up to 2031, is provided for by the proposed allocation, and reserve site if required, in the Slaugham Neighbourhood Plan (SNP).
- West Sussex County Council (WSCC) and Highways England have not objected to the proposed allocation(s) in the SNP. Furthermore WSCC consider, *"it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for Slaugham."* Where a planning application is submitted to develop land at St.Martins Close for residential uses, the transport/highways impacts of the scheme will be determined as part of the planning application.
- Infrastructure requirements: The SNP acknowledges the parish benefits from a range of community facilities including doctors surgery and primary schools. These community facilities are valued locally and therefore SPC have proposed to include Policy 8: Community Facilities in the SNP. Policy 8 of the SNP, seeks to resist the loss of community facilities; or alternatively, where such loss is unavoidable, secure compensatory mitigatory provision. In addition, the Policy supports the enhancement of local facilities. Where infrastructure improvements for e.g transport matters lie outside the scope of the SNP, these matters are included as Aims. Public consultation has confirmed the matters addressed through Aims are important to residents of the parish and are therefore supported by SPC.
- The Consultation Statement, which formed part of the Regulation 16 consultation, provides a chronological account of public consultation undertaken as part of the preparation of the SNP. This has included, and is not limited to: a Public Exhibition held in April 2017 to exhibit sites; and a public meeting held in January 2018 to discuss matters raised as part of the Regulation 14 Pre-submission consultation. In addition to this public meeting, the time period for Regulation 14 Pre-submission consultation was extended to enable stakeholders to make (further) representations following the public meeting. Members of the Neighbourhood Plan Working Group (NPWG) have also meet with members of the Handcross Action Group (HAG) on a number of occasions to address outstanding concerns.
- Settlement boundaries: SPC consider para 2.4 of the SNP could be updated to confirm *"Settlement boundaries have been identified by MSDC at Handcross, Pease Pottage and Warninglid. MSDC have not previously identified a settlement boundary at Slaugham. Due to*

the size of the settlement, MSDC did not wish to encourage any further development in or around Slaugham."

- Para 4.17: As a point of clarification SPC wish "Mill Pond and Furnace" to be updated to read: *"Mill Pond and Furnace Pond."*

In response to comments received from the High Weald AONB and Natural England, I append SPC's response to matters raised.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'Sally McLean', with a stylized flourish at the end.

Sally McLean
Clerk to Slaugham Parish Council
Villages of Handcross, Warninglid, Slaugham & Pease Pottage

Concept Plan – 2012

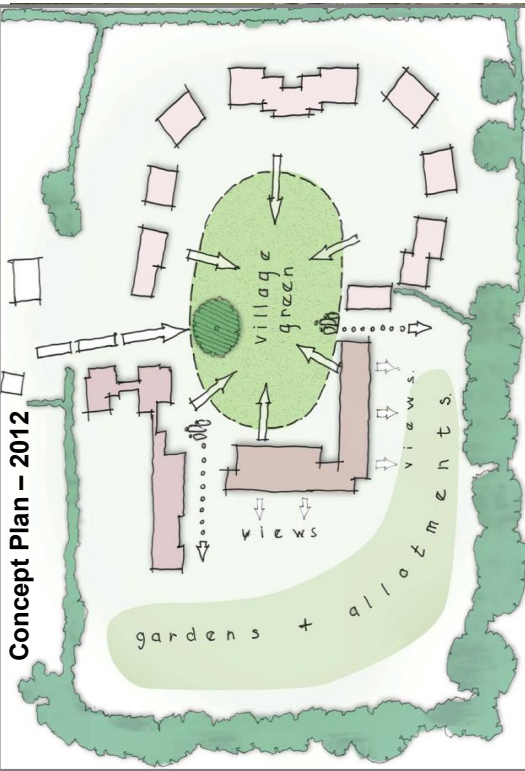


Figure 11 - The Illustrative Masterplan

KEY

- 1. Village green
- 2. Street
- 3. Community hub
- 4. Lane
- 5. Woodland edge
- 6. Square
- 7. Allotments
- 8. Existing play area
- 9. New play area



Figure 3: The site in its local context



As with Policy B6, the intention of the CRTBO is to enhance the quality of the existing amenity space at St. Martin Close and to provide a new public open space adjoining the existing children's play area.