



Ian Cumberworth, Parish Clerk
Parish Centre, Adastra Park
Keymer Road, Hassocks, BN6 8QH
Telephone: 01273 842714

email: info@hassocks-pc.gov.uk
www.hassocks-pc.gov.uk

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Dear Mr Ashcroft

Hassock 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), 07 October 2019, with an updated CN (to correct a typo) received on 10 October 2019.

I set out below Hassocks Parish Council's (HPC's) response to each point of clarification raised. For ease of reference, I first set out the matter raised, followed by the response of HPC. This follows the order of the CN.

Policy 1

Examiner point of clarification: Does 'robust evidence' exist to demonstrate that 'national and local planning policies cannot provide the necessary protection in the proposed Local Gaps' as required by Policy DP13 of the Mid Sussex District Plan?

HPC response: The principle of identifying Gaps within the District is long established. The Mid Sussex Local Plan previously identified and designated Strategic and Local Gaps within the Parish.

The Mid Sussex District Plan (MSDP) acknowledges the settlement pattern of the District makes an important contribution to the distinctive character of Mid Sussex. The Strategic Objectives of the MSDP seek "to promote well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence."

In order to achieve the Strategic Objectives of the MSDP, Policy 13: Preventing Coalescence of the MSDP, sets out a framework to prevent coalescence between settlements. Furthermore, it confirms the importance that the separate identity of settlements is maintained, and people have a sense of having left one settlement before arriving in the next.

The Policy sets out support for the identification of Local Gaps in Neighbourhood Plans. It does not however identify specific areas for protection. In order for Local Gaps to be identified, MSDC require "robust evidence that development within the gap would individually or cumulatively result in coalescence and the loss of the separate identity and amenity of nearby settlements". Furthermore, the policy requires that it must be demonstrated that existing local and national policies cannot provide the necessary protection to these areas.

In light of the above strategic policies, HPC consider the principle of identification of a Local Gap in the HNP is therefore supported.

The Vision of the HNP, which is supported by a series of Strategic Objectives, is to:

"To ensure Hassocks, Keymer and Clayton continue to develop sustainably as a vibrant Parish within a countryside setting.

To provide access for the whole community to local social, cultural, sporting and environmental amenities.

To ensure the Parish retains its rural feel and remains a desirable place to live, work and visit. Changes that occur should protect and enhance the existing character of the Parish”

Feedback at public consultation events, held as part of the preparation of the HPC since 2012, have highlighted a desire for the Gaps, previously identified by MSDC to be protected in the long term. The protection of these areas holds great importance locally in seeking to preserve the settlement identity of Hassocks.

Hassocks has experienced significant growth in recent years with a number of planning permissions having been granted in the Parish. These include Stafford House; Hassocks Golf Club; and land west of London Road. In addition, the Parish is set to experience significant growth with the delivery of the strategic allocation on land to the north of Clayton Mills. MSDP - Policy DP11, the site for strategic development for 500 new homes.

In light of the quantum of development experienced by Hassocks and the wider housing pressures of the District, it is considered the identification of these key areas will protect/safeguard the area to the north and east and west of the built up area of Hassocks and prevent the coalescence of the Parish with surrounding settlements.

The purpose of the Local Gap policy is not only to prevent coalescence as an absolute but also to prevent coalescence through the cumulative impact of development such as small scale/incremental development within the Local Gap area. This is an issue acknowledged in MSDP Policy 13.

The HNP is supported by a Background Paper 'Review of Policy 1: Local Gaps and Regulation 14 Pre-submission Representations'. This Paper, has in part, been prepared by Members of the Neighbourhood Plan Working Group, who are qualified landscape architects.

In light of representations received through the Regulation 14 Pre-submission consultation a review of the extent of the Local Gap has been undertaken to determine whether all land proposed should be remain as part of the Local Gap. A total of 8 character areas were identified for view and assessment. This resulted in parcels of land being removed from the proposed designation.

Attention is also drawn to the adjacent parishes of Hurstpierpoint and Sayers Common and Ditchling, Westmeston & Streat which lie to the west and east of Hassocks. As set out in Section 3 of the Background Paper 'Review of Policy 1: Local Gaps and Regulation 14 Pre-submission Representations' both parishes have 'made' neighbourhood plans and include Local Gap policies.

Policy C3 of the Hurstpierpoint and Sayers Common Neighbourhood Plan, seeks to resist development which individually or cumulatively results in the coalescence and loss of separate identity of neighbouring settlements. In addition, it identifies Local Gaps between: Hurstpierpoint and Hassocks; Sayers Common and Albourne; Hurstpierpoint and Albourne; Hurstpierpoint and Burgess Hill.

Policy CONS 8 of the Ditchling, Westmeston & Streat Neighbourhood Plan seeks to prevent coalescence between Ditchling and the larger settlements of Keymer/Hassocks and Burgess Hill and to protect the Local Gap which separates them.

In light of these policies, it is considered, the proposed Local Gap of the HNP would also help to maintain settlement identity and prevent coalescence with neighbouring parishes.

It is considered Policy 1 is supported and justified by a robust evidence base. The Policy builds upon and adds a local dimension to MSDP Policy 13. The Policy will protect those areas which are considered important locally and in the long term prevent coalescence and maintain the settlement identity of Hassocks.

In keeping with the former District Plan approach, it considered other national and local planning policies along would not provide the necessary protection. This view is reinforced by recent housing development approvals which have materially eroded the Gap.

Policy 2

Examiner point of clarification: Is there any overlap between the proposed LGS 3 and Land at Clayton Mills in Policy 10c?

HPC response: For the avoidance of doubt, HPC wish to clarify and confirm there is no overlap between the proposed LGS3: Land to the south of Clayton Mills and the proposed public open space on land at Clayton Mills (Policy 10c).

LGS3 is proposed in an area to the south of dwellings on Oak Tree Drive and to the north of dwellings on Queens Drive. Whilst Policy 10c forms part of LGS8: Land at Clayton Mills.

An updated Proposal Map will be prepared in due course to illustrate the boundaries of the proposed LGS. Where an inset map would be helpful to provide clarity, this can also be prepared.

Examiner point of clarification: Does the Parish Council wish to add any publicly available evidence to its commentary about the extent to which the second category (of proposed LGSs are 'demonstrably special to the local community'? The second are those which are primarily in agricultural use (LGS 1/2/4)

HPC response: As set out in the Background Paper 'Review of Policy 2: Local Green Space & Regulation 14 Pre-submission Representations, June 2019' all representations received through the preparation of the HNP have been carefully considered by HPC. Having regards to the requirements of paragraph 100 of the National Planning Policy Framework (NPPF), HPC have concluded the areas proposed for designation meets the requirements of the NPPF and quality for LGS designation.

A summary of representations has been provided to HPC. This confirms a total of 69 representations have been made in response to the Regulation 16 Submission consultation. The majority of representations received, 43 in total, have provided comments on Policy 2: Local Green Space. Of these 43 respondents, 35 stakeholders have registered support for the inclusion of Policy 2: Local Green Space. In particular support has been registered for the designation of LGS1 and LSG2.

This level of response is a clear expression of public support for the proposed designation and further confirms the areas proposed for designation are "demonstrably special" to the local community. This level of response reflects the long-standing support which residents of Hassocks have expressed for the proposed designation of LGS in the Parish.

It is evident Examiners have taken into account the level of public support received when considering whether a proposed LGS is 'demonstrably special'. Attention is drawn to the Ardingly's Examiner Report which confirms the level of responses received and the consultation process demonstrated the proposed LGS was demonstrably special to the local community.

Please note, MSDC has in Decision Notice, dated 16 October 2019, granted planning approval for: Hybrid application comprising of outline proposal for residential development of 130 dwellings consisting of 12no. 1-bedroom apartments, 27no. 2-bedroom houses, 47no. 3 bedroom houses and 44no. 4 bedroom houses and associated access, together with change of use of part of the land to country open space, following the provision of a new pedestrian tunnel under the railway. All matter reserved apart from access. Updated information received 10th July regarding Air Quality on land at Friars Oak (DM/19/1897).

Examiner point of clarification: What is the relationship between the proposed designation of LGSs 1/2/4 and Section ID:37-015-20140306 of Planning Practice Guidance?

HPC response: National Planning Policy Guidance (NPPG), paragraph 37-015-20140306 details advice with respect to 'How big can a Local Green Space be?'

Guidance advises 'There are no hard and fast rules about how big a Local Green Space can be because places are different, and a degree of judgment will inevitably be needed. However, paragraph 100 of the NPPF is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.'

As set out in the Background Paper 'Review of Policy 2: Local Green Space & Regulation 14 Pre-submission Representations, June 2019', there are examples locally, where Examiners have considered whether a proposed LGS comprises an extensive tract of land.

Attention is specifically drawn to the conclusions of the Examiner of the Plumpton Neighbourhood Plan. In considering the largest proposed LGS, known as Fields on Little Inholmes Farm, which extended to 6.8 hectares, the Examiner concluded that in relation Plumpton Green as a whole, the area did appear as an extensive tract of land.

In addition, attention is also drawn to the Lewes Neighbourhood Plan, which proposed allocation of areas of land between 12-27 hectares. In considering whether the areas represented an extensive tract of land, the Examiner concluded the proposed areas are "local in scale with the wider context of the neighbourhood area" and should be designated as LGS.

With respect to the areas proposed in Hassocks: LGS1: Land to north of Shepherds Walk extends to 7.12 hectares; LGS2: Land at the Ham extends to 4.97 hectares; and LGS4: Land to the east of Ockley Lane extends 5.07 hectares.

With respect to land area, it is material to note that Plumpton and Hassocks are comparable. Plumpton Parish has a population of 1,644 persons and extends to 958 hectares, whilst Hassocks has a population of 7,667 persons and extends to 1087 hectares.

Given the comparable land size of Hassocks to Plumpton, it is considered the proposed designation of LGS1, LGS2 and LGS4 which range from 5-7 hectares in size do not represent an extensive tract of land when considered in the wider context of Hassocks.

Examiner point of clarification: What are the sizes of proposed LGSs 1/2/3/4/5?

HPC response: The extent of the LGS's are set out below.

- LGS1: Land to north of Shepherds Walk: 7.12 hectares
- LGS2: Land at the Ham: 4.97 hectares
- LGS3: Land to the south of Clayton Mills: 1.85 hectares
- LGS4: Land to the east of Ockley Lane: 5.07 hectares
- LGS5: Land at south of Downlands: 1.20 hectares

Examiner point of clarification: Outside the South Downs National Park, the LGSs overlap with the relevant proposed Local Gap. Was this deliberate?

Which of the two policies would apply and/or take preference in the determination of any planning application in the affected proposed LGS where this overlap exists?

HPC response: For the avoidance of doubt, the proposed Local Gap includes the following proposed LGS areas: LGS1; LGS2 and LGS4. The following LGS lies outside of the proposed Local Gap: LGS3; LGS5; LGS6; LGS7 and LGS8.

As set out above, the Local Gap is proposed to protect those areas which are considered important to prevent coalescence and maintain settlement identify. The identification of Local Gaps is advocated through Policy DP13 of the MSDP.

The NPPF confirms, neighbourhood plans allow communities to identify and protect green areas of particular importance. As set out in the supporting text, paragraph 4.20, the purpose of the proposed designations are to provide special protection against the inappropriate development of areas of particular importance as green space. In addition, Policy 2 confirms development proposals which conflict with the purpose of the designation will be resisted in these areas.

The proposed designation of the Local Gap and LGS have distinct planning objectives. It is acknowledged their objectives can however be mutually compatible. It is considered both policies have a role to play in protecting the identified areas from unwanted development.

HPC are aware there may be examples where development may be compatible with the objectives of Policy 2 but conflict with the objectives of Policy 1. In this instance, HPC consider it will be a matter of judgement and balance for the decision maker.

Policy 4

Examiner point of clarification: Is the first paragraph intended to apply primarily to specific proposals to reduce the risk of flooding (rather than to proposals which incorporated such measures as part of wider development)?

HPC response: HPC confirm the first paragraph is intended to apply primarily to specific proposals, for e.g. attenuation ponds, which seek to reduce the risk of flooding.

The second part of the policy seeks to support development proposals generally which incorporate techniques to reduce existing run-off rates. It is considered this approach will positively help to manage flood risk locally.

Policy 7

Examiner point of clarification: The policy approach is well-developed. I saw the different characters of the two conservation areas as part of my visit. I am proposing to recommend a modification so that the policy is simplified and that the two sets of special features are relocated into the supporting text.

Does the Parish Council have any comments on this proposition?

HPC response: The two Conservation Areas of Keymer and Clayton are valued locally. Their importance is reflected in the Strategic Objectives of the HNP.

The identification and inclusion of 'special features' within Policy 7, is a result of ongoing discussion and positive collaboration with MSDC. The evidence base of the MSDP and the Conservation Area Paper, August 2018, has been drawn upon to identify such features.

HPC has worked with MSDC and taken advice from their Officers in the preparation of Policy 7; specifically, with respect to the identification of locally distinct features to ensure the policy adds local value over and above MSDP Policy DP35: Conservation Areas.

HPC's preference would be to include the special features within the main body of the Policy. However, should the Examiner recommend these features are included within the supporting text, HPC would be happy to accept this modification.

Policy 9

Examiner point of clarification: However, is the Townscape Appraisal in the policy the same document as the Village Design Statement referenced in paragraph 4.58?

HPC response: The Townscape Appraisal is a separate document to the Village Design Statement.

The Townscape Appraisal was prepared to support the preparation of the initial Hassocks Neighbourhood Plan (HNP). It forms part of the evidence base of the HNP and has informed Policy 9: Character and Design.

The Village Design Statement, referred to in paragraph 4.58, was prepared by the Village Design Statement Working Group and also forms part of the evidence base of the HNP. It is a stand-alone document.

Policy 12

Examiner point of clarification: Have the facilities to be protected by this policy been identified beyond the general approach in paragraph 5.12?

HPC response: No further identification of community facilities beyond those identified in paragraph 5.12 has been identified.

It is considered Policy 12: Community Facilities would seek to resist the loss of local facilities while positively supporting the alterations/replacements to such locally important facilities.

Policy 13

Examiner point of clarification: As submitted, this does not read as a land use policy. Its focus is on working on educational provision with other organisations. It is a more detailed version of Aim 2?

If so, it needed?

Alternatively, are any sites actively being considered/safeguarded for the provision anticipated?

HPC response: The background to Policy 13 (Education Provision) is extensive. At the time of the preparation of the initial Neighbourhood Plan (subsequently withdrawn) extensive discussions took place between HPC, District Council and representatives of the Education Authority at West Sussex County Council.

The latter made clear, that at that time, there was an identifiable need for the delivery of a new (minimum) two form entry primary school within the Parish.

Extensive discussions took place between HPC and the two higher tier Authorities in respect of seeking to identify a preferred location for the delivery of this school. In conjunction with this, a number of promoters of housing sites indicated a willingness to dedicate land for the delivery of a primary school, in conjunction with housing development.

HPC requested the County Council to undertake an appraisal of site options, in order for them to inform and advise on a preferred location. This work was slow to come forward.

Given the timelines of preparing the original HNP, it was ultimately concluded for the HNP to acknowledge the identified need for a primary school and set out a criteria-based approach to the identification and delivery of this school.

More recently, MSDC's allocation of land north of Clayton Mills for a strategic development, has identified the potential for that site to deliver a new primary school. At the time of preparing the HNP, it was understood that discussions in relation to the delivery of this were ongoing, in respect of detailed location, form and extent.

HPC has long supported the delivery of a new primary school, and it remains a clear aspiration of the local community. HPC acknowledge that delivery of the primary school lies outside of their control, but nonetheless considers it is a legitimate land use policy. On this basis, and noting the current uncertainty, unless and until planning permission is granted, it is considered that there is justification for a policy that seeks to support the delivery of a new primary school.

For the avoidance of doubt, this approach is materially different to the aspirations supported in Aim 2. This relates to proposals for delivery of education facilities generally within the Parish. Specifically, there have been iterative proposals for the evolution and development of the Parish's infant, junior and secondary school. Aim 2 seeks to specifically set out support for the approach to applications on this site. It is not seeking to limit the aim to these three sites, noting that during the lifetime of the HNP other education facilities may be brought forward in the Parish.

Policy 14

Examiner point of clarification: Is criterion 7 necessary given the contents of Policy 14?

HPC response: Criterion 7 confirms development will be supported where it complies with the criteria of Policy 1: Local Gap. This criterion has been included for completeness, to provide clarity and in an effort to avoid any perceived contradiction with the requirements of Policy 1.

The criteria provided is an exhaustive list and seeks to clarify where proposals for residential development will be supported outside of the built-up area boundary.

Policy 15

Examiner point of clarification: Does this policy relate to the housing development that has just commenced at the Hassocks Golf Course site?

If so, is it necessary?

HPC response: There is a legacy in the Parish of where residential planning permission is granted on a site and subsequent applications are made to, amongst other matters, increase housing. Hassocks Golf Club has such a history.

An application to comprehensively redevelop the site for up to "130 residential units, replacement golf clubhouse and new driving range, new golf holes and associated infrastructure" was submitted in April 2016, and subsequently approved by MSDC in June 2017.

Since the grant of planning permission, a further application for the redevelopment of the site comprising of 165 residential units has been submitted to and approved by MSDC.

Whilst HPC acknowledge the principle of development has already been established on the site. In light of subsequent applications made since April, HPC wish to ensure any amendments and/or addendums are considered against Policy 15 to ensure any future applications are developed in line with the Vision and Strategic Objectives of the HNP.

Policy 16

Examiner point of clarification: The opening paragraphs of this policy are potentially confusing. The first paragraph supports proposals which would accord with the relevant Local Plan policy. The second paragraph comments about the type of development the Parish Council would support.

Has this policy been designed to add value to the Local Plan policy? If so, to what extent does it do so?

If this is not the case is Policy 16 necessary?

HPC response: The first HNP, which was submitted to MSDC in June 2016, had previously proposed to allocate land to the north of Clayton Mills, for up to 140 residential development. However, this version of the HNP did not proceed to Examination.

At the point in time MSDC proposed to allocate land to the north of Clayton Mills for 500 homes, a significant quantum of objection was submitted to the proposed allocation, including by HPC. Notwithstanding the level of objections, the Inspector of the MSDP concluded in his Report that the proposed allocation was 'sound'.

The first paragraph to Policy 16 has therefore been included to acknowledge the site has been allocated for 500 residential dwellings by Policy DP11 of the MSDP. It is considered this approach is in line with Paragraph 29 of the NPPF which confirms neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.

In addition, it is considered the opening paragraph provides consistency between the MSDP and HNP. Whilst HPC acknowledge the allocation of the site through DP11 has established the principle of development on the site, HPC wish to ensure the site is development in line with the Vision and Strategic Objectives of the HNP and therefore considers the Policy necessary.

The local value the policy adds is to detail the criterion HPC would wish to see addressed as part of any applications on the site. In particular, criterion 1, will ensure development proposals will not extend into the Local Gap.

Sustainability Appraisal

Examiner point of clarification: Does the Parish Council (and/or its consultants) wish to respond to the comments on the SA received from Rydon Homes (Sigma Planning), Clayton with Keymer Parish Council (Evison & Company) and Globe Homes (Lewis and Company)?

In particular does the Council have any comments on whether the suggested additional spatial options are reasonable alternatives to the approach taken in the Plan and the accompanying SA?

HPC response: The comments from the three developer/agents are noted. With respect to the comments received from Evison and Company and Lewis and Company, it is noted that these in part, repeat submissions made in response to the Regulation 14 Pre-submission Neighbourhood Plan consultation stage.

The response to these submissions are set out below having regard to the thematic submissions that have been made.

Housing Requirement

Chapter 5 of the NPPF sets out national policies for delivering a sufficient supply of homes. Paragraph 65 states that strategic policy making authorities should establish a housing requirement figure for the whole area, which shows the extent to which the identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the Plan period. It notes that within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas, which reflects the overall strategy for the pattern and scale of development and any relevant allocations. It notes that "once the strategic policies have been adopted, these figures should not need retesting at the Neighbourhood Plan Examination, unless there has been a significant change in circumstances that effects the requirement."

The MSDP was adopted in March 2018. Policy DP4 sets out policies in relation to housing, including the spatial distribution of overall numbers. Hassocks and Keymer is identified as a Settlement 2 Category where there is a minimum housing requirement over the Plan period of 3,005 dwellings, which taking account of completions and commitments as of April 2017, there is a minimum residual requirement of delivery of 838 homes.

Page 36 of the MSDP sets out the Neighbourhood Plan strategy. It notes that the table on page 37 "gives clarity between the district housing requirement and the role of individual Neighbourhood Plans in meeting this. It shows the minimum residual amount of development reach settlement over the rest of the Plan period, as at April 2017."

This notes that the minimum requirement over the Plan period for Hassocks is 882 dwellings, of which this number has been delivered via commitments and completions as at 1st April 2017. The table therefore makes clear that there is no requirement for additional completions beyond those already identified.

As such, and as a starting point, it is submitted that the Neighbourhood Plan is not required to facilitate the delivery of additional housing in order to comply with strategic plan policies. The Plan is therefore able to come forward in the absence of such policies and would be wholly compliant with the adopted MSDP.

Notwithstanding this, and in accordance with general planning policy, the HNP has been prepared with regard to the aspiration for positive planning. In particular, the MSDP has not sought to impose a "cap" on the number of dwellings that can be delivered in the Parish to 882.

The submissions by Sigma assert that the objective and indicators within the SA seek to only deal with affordability and local housing need. This fails to acknowledge that the approach undertaken within the SA is to ensure that the delivery of housing is in accordance with need that is identified that reflects the higher tier policies of the Development Plan. On this basis, the objective is to positively meet local housing need, as established in the MSDP. It is not therefore "too limited in scope". Furthermore, it has specifically sought to consider the potential to meet district wide housing need.

The SA that accompanies the Submission Version HNP sets out, at Section 5, an appraisal of the HNP policy options against the Sustainability Framework. It notes that in preparing the HNP a range of policy areas and aims have been considered, and a range of options for each policy have been identified and considered.

The work undertaken is in accordance with the Government's Practical Guide to the Strategic Environmental Assessment (SEA) Directive. Stage B relates to developing and refining alternatives and assessing effects. B2 sets out the approach to developing strategic alternatives. This makes clear that there is a requirement to appraise the likely significant environmental effects of implementing the Plan or programme "and any reasonable alternatives". It notes that "alternatives considered often includes scenarios termed "no Plan or programme" and "business as usual". It notes that more detail in this is given in Appendix 6 of the document. That makes clear that in identifying alternatives "only reasonable, realistic and relevant alternatives must be put forward". The Guidance notes that "to keep the big issues clear, the alternative considered at this early stage need not be elaborated in too much detail. Only the main differences between the alternatives need to be considered and documented". It also notes that "the assessment of alternatives may be made in broad terms against the SEA objectives, provided there is sufficient need to identify the significant i.e. environmental effects of each alternative."

This approach has been wholly endorsed and followed in the undertaking of the Sustainability Appraisal, that supports the HNP.

Chapter 5 of the SA sets out the approach undertaken in following an iterative approach to the appraisal of the housing requirement. It notes that there were three options considered in relation to the overall growth strategy. These are detailed at Paragraph 5.5. These are clear, distinct alternatives, each applying an alternative growth strategy, and each applying an alternative method to deliver that strategy. These are then appraised as set out at Appendix 1 of the SA. This tests the growth strategy against the Sustainability Framework and indicates that Option B performed best having regard to the matrix of the framework. That option supports small scale growth/windfall within and adjoining the built-up area boundary (in line with criteria including DP6 of the MSDP). This would deliver housing in excess of the 882 required in the MSDP, given that figure is met by existing completions and commitments as of April 2017.

Option C considered the potential for the allocation of additional housing sites beyond existing completions and commitments. This Option noted that sites could be identified using the MSDC Strategic Housing and Economic Land Availability Assessment. This identified sites that lie beyond the existing built-up area boundary of the Parish. This reflects the character of Hassocks of being without a legacy of extensive areas of previously developed land within the built-up area that may be suitable for significant housing growth.

These housing sites were therefore appraised having regard to the alternative options of the growth strategy. It was concluded these would negatively impact on environmental objectives, and in particular Objective 1 which seeks to conserve and protect the countryside and landscape character. It is submitted that it is entirely reasonable to conclude that the delivery of housing on currently undeveloped sites, beyond the built-up area boundary would have a detrimental impact against this objective. There have been no submissions that challenge this conclusion.

Having regard to the recommended approach to the SEA Directive, makes clear that, it is submitted that the appraisal of alternative growth strategy options was clear, unambiguous, reasonable in identifying alternatives, and clearly concluded the extent to which these alternatives would impact on the Sustainability Framework.

Paragraph 5.B.7 of the Practical Guide to the SEA Directive, makes clear that, it is not the purpose of the SEA to decide the alternatives to be chosen for the plan or programme as that is the role of the decision-maker to have to make choices on the plan or programme to be adopted. Rather, "SEA simply provides information on the relative environmental performances and can make the decision-making process more transparent". It is submitted that this has been achieved by the SA that accompanies the Neighbourhood Plan.

Housing Allocations

The submissions in respect of the SA note that those sites allocated for housing in the HNP are those that are already identified as "commitments".

The submissions assert that a "reasonable alternative" of the sites allocated should have been to consider sites that are not currently commitments; i.e. either do not benefit from planning permission or are not identified in a higher tier Development Plan document for development.

It is respectfully submitted, that this approach fails to acknowledge the recommended best practice guidance.

The guidance makes clear that it is not an obligation on the SA to test all alternatives, but rather to test "reasonable alternatives".

Having regard to the housing allocations, it is necessary to note that a cascade approach was followed in undertaking the SA. Prior to considering individual allocations, the SA considered the overall growth strategy. This concluded the best approach was to deliver housing numbers identified as completions and commitments, together with supporting further growth through small scale/windfall development in accordance with, amongst others, DP6 of the MSDP.

The sites that benefit from planning permission, or strategic allocation, are envisaged to come forward within the Parish over the Plan period. The Neighbourhood Plan does not seek to impede this. The "planning status" of these sites is significantly and materially different than other sites that have been promoted for housing development within the Parish but do not benefit from categorisation as an existing "commitment".

On this basis, it is not considered necessary, or appropriate, to consider the competing merits and demerits of a site with planning permission/allocated for development to come forward, against a site that is not. The former will come forward irrespective of an allocation. The planning policies that support the delivery of housing development on "commitments" sites are seeking to determine the detail of the development that is delivered, not the principle.

On this basis, the SA of Policy 15 (Hassocks Golf Club) and Policy 16 (Land to the north of Clayton Mills and Mackie Avenue) is with regard to a policy that seeks to support development in line with clear criteria, and an alternative "no plan or programme" scenario. It is submitted that in light of the state of these sites as "commitments" for housing development, the two scenarios presented to appraise the policy options are both entirely appropriate and reasonable.

Furthermore, it is submitted that it would not be a reasonable alternative to test a policy which supports housing development on this site against housing delivery on a site that is not a commitment. It is not a reasonable alternative scenario.

Housing development on sites effected by Policy 15 and 16 will come forward in any event of the alternative scenario tested. Therefore, it is not an alternative.

It is therefore submitted that the SA has appropriately and reasonably tested alternatives, including the potential effect of the housing sites promoted by respondents criticising the SA. This approach is in accordance with Appendix 6 of the Guide to the SEA Directive.

One of the respondents has sought to draw comparison between other SA's supporting other Neighbourhood Plans. This issue has been considered and a response set out at Paragraph 9.22 of the Background Paper in respect of Housing Matters. It is not proposed to repeat these submissions, other than to note that they relate to wholly and materially different circumstances, and these do not have relevance to the appraisal of this Plan and its associated SA.

Local Green Space

The submissions assert that a policy option appraisal in respect of the Local Green Space policy should have considered the effect of "losing a constraint free sustainable housing site".

As has been detailed earlier in this response, the SA clearly considered, as a first step, the growth strategy options of the HNP. In this, options for the allocation of housing sites beyond existing completions and commitments were duly considered (Option C). On this basis, the merit and effect of additional housing allocations beyond completions and commitments was carefully appraised. This took place prior to the subsequent appraisal of the policy options appraisal for the allocation of Local Green Space. This is entirely appropriate and in accordance with the iterative approach recommended in the Best Practice Guide to the SEA Directive.

On this basis, it is submitted that the policy option of the designation of LGS, as set out in Appendix 2 of the SA is wholly reasonable and appropriate. It sets out the reasonable alternative of A "no plan or programme" option. This, therefore, took account of the effect of the Shepherds Walk site being promoted by the developer not being designated as an LGS.

Notwithstanding the submissions in respect of this respondent's comments, it is acknowledged that planning permission has now, recently been granted for development of the Shepherds Walk site for housing, and associated infrastructure.

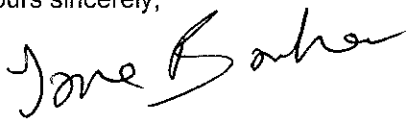
Representations

Examiner point of clarification: Does the Parish Council wish to comment on any of the representations made to the Plan?

In particular, does it wish to comment on the various representations from the development industry on Policies 1 (Local Gaps) and 2 (Local Green Spaces)?

HPC response: No further comments on representations received.

Yours sincerely,

P.P. 

Ian Cumberworth
Parish Clerk

