

John Slater Planning Ltd

Fittleworth Neighbourhood Development Plan 2018- 2033

Submission Version

A Report to the South Downs National Park Authority on the Examination
of the Fittleworth Neighbourhood Plan

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Executive Summary

My examination has concluded that the Fittleworth Neighbourhood Development Plan should proceed to referendum, subject to the Plan being amended in line with my recommended modifications, which are required to ensure the plan meets the basic conditions. The more noteworthy include –

- The requirement for applications to demonstrate that the proposal has had a regard to the landscape character areas, be proportionate to the scale and size of the development and its ability to impact on the landscape.
- Removing the policy wording regarding protecting local views as these are not identified.
- Amending the policy to require SUDS, rather than preparing surface water management plans.
- Minor changes to the wording of the built environment policy.
- Amending the policy wording regarding the design of the fencing, to require it to be compatible with existing fencing in the area
- The policy proposing the community shop is now superfluous and can be deleted.
- The residential extension policy be amended by removing criteria relating to the loss of small homes.
- Inserting a new settlement boundary and site allocation plan
- Expanding the types of residential development that can take place outside the settlement area so as to align with national policy.
- Removing the text of the Policy FITT 9 that does not relate to the two allocation sites and removing the requirement on one of the sites, relating to measures to implement traffic speed reduction measures on the A283.

The referendum area does not need to be extended beyond the plan area.

Introduction

1. Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies which will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the policies of the South Downs National Park Local Plan, which was adopted on 2nd July 2019. Decision makers are required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.
2. The neighbourhood plan making process has been led by Fittleworth Parish Council. A Steering Group was appointed to undertake the plan preparation made up of parish councillors and local volunteers. Fittleworth Parish Council is a “qualifying body” under the Neighbourhood Planning legislation.
3. This report is the outcome of my examination of the Submission Version of the Fittleworth Neighbourhood Plan. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum. If the Plan then receives the support of over 50% of those voting at the referendum, the Plan will be “made” by the South Downs National Park Authority.

The Examiner’s Role

4. I was initially appointed by the South Downs National Park Authority in April 2019, with the agreement of Fittleworth Parish Council, to conduct this examination. My role is known as an Independent Examiner. My selection has been facilitated by the Neighbourhood Planning Independent Examiner Referral Service (NPIERS) which is administered by the Royal Institute of Chartered Surveyors (RICS).
5. In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 40 years’ experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant and director of John Slater Planning Ltd. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of both the South Downs National Park Authority and Fittleworth Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.
6. Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:

- That the plan should proceed to referendum on the basis that it meets all the legal requirements.
 - That the plan should proceed to referendum if modified.
 - That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
7. Furthermore, if I am to conclude that the Plan should proceed to referendum, I need to consider whether the area covered by the referendum should extend beyond the boundaries of the area covered by the Fittleworth Neighbourhood Plan area.
 8. In examining the Plan, the Independent Examiner is expected to address the following questions
 - a. Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
 - b. Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 - namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
 - c. Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and has it been developed and submitted by a qualifying body?
 9. I am able to confirm that the Plan does relate only to the development and use of land, covering the area designated by the South Downs National Park Authority, for the Fittleworth Neighbourhood Plan, on 5th March 2015, if modified in accordance with my recommendations.
 10. I can also confirm that it does specify the period over which the plan has effect, namely the period from 2018 up to 2033.
 11. I can confirm that the plan does not cover any “excluded development”.
 12. There are no other neighbourhood plans covering the area covered by the neighbourhood area designation.
 13. Fittleworth Parish Council, as a parish council, is a qualifying body under the terms of the legislation.

The Examination Process

14. The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or if a person has a fair chance to put a case.
15. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.

16. I am satisfied that I am in a position to properly examine the plan without the need for a hearing.
17. I carried out an unaccompanied visit to Fittleworth and the surrounding countryside on Sunday 28th April 2019. I was able to walk and drive around the village and the surrounding countryside to familiarise myself with the plan area.
18. Following my site visit and my initial assessment of the plan, I had a number of matters on which I wished to receive further information, both from the Parish Council and the National Park Authority. That request was set out in a document entitled *Initial Comments of the Independent Examiner* dated 30th April 2019. I received a combined response on 30th May 2019.
19. All documents have been placed on the respective websites.

The Consultation Process

20. Work on the plan commenced with a public meeting held in the Village Hall on 20th November 2014, which was attended by 25 residents. This led to the setting up of a small steering committee. One of the initial task was to instigate a housing needs survey, which was commissioned from Chichester District Council. The survey of the villagers took place in May - June 2015. The survey results, as well as the identification of a number of sites which have been put forward in the SHLAA, were included in an exhibition held on the 30th and 31st October 2015. 93 questionnaire responses were received. A preliminary version of the plan was placed on the village website during March 2016 and this was subject to a SEA and HRA Assessment.
21. The Pre - Submission version of the plan was published on 15th January 2018. This was placed on the website as well as made available in locations around the village. The plan was the subject of a six-week consultation, known as the Regulation 14 consultation which ran from 15th January 2018. The results of that consultation are fully set out in the Consultation Statement, which also shows how the plan has been changed as a result of the consultation responses.

Regulation 16 Consultation

22. I have had regard, in carrying out this examination, to all the comments made during the period of final consultation which took place over a 6-week period, between 22nd February 2019 and 12th April 2019. This consultation was organised by the South Down National Park Authority, prior to the plan being passed to me for its examination. That stage is known as the Regulation 16 Consultation.
23. In total, 10 individual responses were received from Natural England whose communication was received after the formal deadline, but I have decided to

have regard to its comments), South Downs National Park Authority, Chichester District Council, National Grid, West Sussex CC, Southern Water, Historic England, Highways England, Environment Agency and Kiely Planning on behalf of Montagu Developments Ltd

24. I have carefully read all the correspondence and I will refer to the representations where it is relevant to my considerations and conclusions in respect of specific policies or the plan as a whole.

The Basic Conditions

25. The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what is known as the Basic Conditions which are set down in legislation. It will be against these criteria that my examination must focus.

26. The five questions, which seek to establish that the Neighbourhood Plan meets the basic conditions test, are: -

- Is it appropriate to make the Plan having regard to the national policies and advice contained in the guidance issued by the Secretary of State?
- Will the making of the Plan contribute to the achievement of sustainable development?
- Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?
- Will the making of the Plan breach or be otherwise incompatible with EU obligations or human rights legislation?
- Will the making of the Plan breach the requirements of Regulation 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017?

27. In July 2018, the Government issued a revised National Planning Policy Framework which was further updated in early 2019. However, in accordance with the stipulation of Paragraph 214 of the 2019 NPPF, this examination has been carried out applying the policies in the 2012 version of the Framework as the plan was submitted immediately before the transitional period deadline, on 23rd January 2019.

Compliance with the Development Plan

28. To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which at the time the plan was being prepared was the saved policies in the Chichester

District Local Plan 1999, much of which was out of date. The development plan also includes the West Sussex and South Downs Waste Local Plan 2014 and the West Sussex and South Downs Joint Minerals Local Plan 2018. However, the latter two plans cover matters that are “excluded development” that cannot form part of a neighbourhood plan.

29. During the neighbourhoods plan’s preparation and indeed at the start of the examination, work was still progressing on the emerging South Downs Local Plan. However, immediately prior to the formal issuing of this examination report, on 2nd July 2019, the South Downs National Park Authority resolved to adopt the plan, incorporating the modifications which the Local Plan Inspector required, to ensure the plan met the legal requirements. None of the modifications affected the housing number proposed for Fittleworth. As the adopted plan, at the close of this examination, it is the strategic policies in the new local plan that the neighbourhood plan is required to be in general conformity with, to comply with the basic conditions.

Compliance with European and Human Rights Legislation

30. The South Downs National Park Authority issued a Screening Opinion for Strategic Environmental Assessment, on 11th March 2016 which concluded, having consulted with the three statutory consultees, that a full assessment, as required by EU Directive 2001/42/EC which is enshrined into UK law by the “Environmental Assessment of Plans and Programmes Regulations 2004”, would be required. A Sustainability Appraisal incorporating a Strategic Environmental Assessment was prepared by Horsham District Council, on a consultancy basis, dated 14th September 2018.
31. The National Park Authority, as competent authority, also issued at the same time its screening under the Habitat Regulations. This screening assessed the submitted plan and concluded that it could have adverse effects upon the nearby European protected sites, namely the Mens SAC as well as known habitats of protected species. An Appropriate Assessment was prepared by AECOM dated 3rd December 2018 which concluded that the plan will not have any adverse effects on the protected habitats.
32. I am satisfied that the basic conditions regarding compliance with European legislation, including the newly introduced basic condition regarding compliance with the Habitat Regulations, are met. I am also content that the plan has no conflict with the Human Rights Act.

The Neighbourhood Plan: An Overview

33. I must firstly commend the Steering Group for preparing three well-presented submission documents. This is a clearly written and focused neighbourhood plan, which deals with the matters in a concise manner.

34. The starting point for the consideration of this neighbourhood plan is the expectations as to the level of residential development which the plan is expected to deliver. In terms of the policies set out in the newly adopted Local Plan, there is an expectation that Fittleworth should provide, over the 19-year plan period, only 6 additional dwellings (approximately).
35. The Parish Council has taken the decision, based on evidence in the commissioned Rural Housing Report and community support, to allocate sites for an additional 18 new homes. That is perfectly in order, as communities are able to allocate more houses than set out in the Local Plan.
36. I have concluded that the plan has approached the site selection process in a considered and collaborative manner, which has used objective criteria. I would congratulate the Parish Council for approaching the challenge of neighbourhood planning in such a proactive manner.
37. My recommendations will necessitate some changes to the supporting text which is beyond my scope as examiner to address, as my recommendations concentrate on the policies themselves. Some adjustment of the supporting paragraphs will be necessary to ensure that the plan reads as a cogent and coherent planning document.

The Neighbourhood Development Plan Policies

Policy FITT 1 – Landscape Character

38. This policy reflects the general expectation that development in the national park should conserve and enhance landscape character. My concern is that this policy places an onerous requirement on **all** applicants to clearly demonstrate how their proposals relate to “key characteristics, sensitivities and development and management considerations for the landscape character areas.” This is a particularly demanding requirement for minor development, which is unlikely to have any tangible impact on the wider landscape and the particular characteristics of that landscape area. The type of development I have in mind is a residential extension in Greatpin Croft or The Gardens, or perhaps a classroom extension at the Primary School.
39. I take the point made by the Parish Council, in its response to my Initial question, that minor changes can have a significant impact on local landscape character. I consider that those landscape impacts are likely to be more sensitive in areas outside the settlement boundary. The focus of the policy is to assess the impact of development on the wider landscape character area, as set out in the Integrated Landscape Character Assessment, such as the Blackdown to Petworth Greensand Hills, or the North Rother Valley Sandy Arable Farmland in the plan area, not necessarily the “local landscape character”, which is covered by other planning policies.
40. I am also conscious that the quoted Policy SD4 from the South Downs Local Plan imposes a similar requirement, but that expectation is tempered by the

fact that the assessment should be “in proportion to the size, scale and likely impact of the proposals”. I consider that first element of the policy, needs to be amended to ensure that the requirement only places an expectation on applicants to demonstrate that their proposals have had regard to the impact on the wider landscape, in proportion to “the size, scale and likely landscape impact” of what is being proposed. That will be a more proportionate response to assessing development in a sensitive landscape.

41. In terms of the protection of views it is important that an applicant should know whether a particular proposal will affect a viewpoint which is valued by the local community. Neighbourhood plans throughout the country have been able to identify such views and it is disappointing that the Parish Council has not followed that practice, as it is possible to identify all important views at a parish level. The Secretary of State’s requirement is that a neighbourhood plan policy can be used with confidence by a decision maker, when determining a planning application and that is not possible if the viewpoint is not identified.
42. I have reluctantly concluded that the absence of identified views shown on a map, means that the neighbourhood plan cannot be used with certainty when it comes to protecting these locally important views, and would therefore be contrary to the Secretary of State’s advice. The policy in the South Downs Local Plan can be relied upon when considering planning applications. When the Parish Council comes to review the plan in due course, I would recommend that it does seek the community’s views as to which particular key viewpoints are particularly important.

Recommendations

In the first paragraph, replace the second sentence with “Applicants will be expected to demonstrate, to the extent which is proportionate to the size

and scale of the development and its likely landscape impact, how the proposal has had regard to”

Delete criterion c)

Policy FITT 2 – Biodiversity

43. I have generally no concerns regarding the requirements of this policy. However, the final sentence, which signposts applicants to explanations as to the importance of bats, does not actually constitute a plan policy and the sentence should be moved to supporting text.
44. Furthermore, the test in respect of criterion d) goes beyond the requirements set out in paragraph 118 of the NPPF (2012), where there is a requirement to address the balance, namely “the need for and benefits of the development in that location clearly outweigh the loss”. I consider that these words can be usefully added to the policy to bring it into line with Secretary of State advice.

Recommendations

In d) replace “there are wholly exceptional reasons” with “the need for and benefits of the development in that location clearly outweigh the loss”

Delete the final sentence and move to the supporting text.

Policy FITT 3 – Water and Utilities Infrastructure Management

45. I raised with the Parish Council my concerns regarding the need for **all** developments, even a domestic extension, to have to prepare a surface water management plan. The Parish Council acknowledged my concern and proposed an alternative form of wording which I consider to be an appropriate response and I will adopt the revised wording in my recommendation.

Recommendation

Replace “demonstrate that there is a surface water management plan that shows the risk of flooding both on and off site is minimised and managed” with “adopt a Sustainable Urban Drainage Scheme, where it is appropriate, or to make adequate provision for dealing with surface water disposal on a domestic property.”

Policy FITT 4 – Built Environment

46. In my initial questions posed to the Qualifying Body, I suggested that the maintenance and repair of listed buildings may not necessarily need consent. The Parish Council’s response was to suggest introducing a new caveat “Subject to the necessary consents “. However, that would not add anything to the substance of the policy, as some planning applications may be dependent upon the consideration of a proposal against this very policy. I accept that some repairs to listed buildings may need listed building consent. I consider that the introduction of “sustainable” in terms of the type of works, is unnecessary, as it is national policy to support heritage assets being put to “viable uses, consistent with their conservation”.
47. The second sentence of the policy regarding the time scales for the production of management plans and character assessments, does not constitute a planning policy for the “development and use of land”. It should be removed from the actual policy but can be included in the supporting text. Similarly, the statement that the only Grade 2 listed building at risk, has been fully restored is not a planning policy but a statement of fact and should be moved to the supporting text.

Recommendations

Delete “sustainable “

Replace “maintenance with “alteration”

Delete the second and third sentence from the policy and move to the supporting text.

Policy FITT 5 – Design of New Development

48. I enquired whether the intention of the Parish Council was for the policy to relate to *all* development or just *residential* development. Its response was that the intention was that it should apply to “new development and any alterations to existing buildings”. However, some development will not necessarily need to be able to satisfy all the requirements such as “density” “the need for smaller units of accommodation”, “secure private gardens”, “access to public transport” etc. if they are proposing non-residential development. These are relevant design aspirations if it is relevant to the development being proposed and therefore I will recommend a suitable caveat to make the policy usable in a development management context.
49. The penultimate criterion relating to sustainable urban drainage systems is already covered by Policy FITT 3 and there is no value in duplicating policy requirements.
50. The Parish Council agreed that the criteria relating to means of enclosure, not being “suburban in character”, will be difficult to define and to prevent fences or walls, say in some rear gardens, where they would not be in character with the surrounding properties. I propose to accept the suggested modification which I will incorporate into my recommendations.
51. The Secretary of State in his Written Statement to the House of Commons dated 25th March 2015 states that neighbourhood plans should not impose “any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings”. I consider such additional technical requirements are being proposed when the policy refers to “sustainable construction methods”, which will be difficult to actually define at a planning application stage. I also consider that the criterion requiring “appropriate renewable and low carbon technology” will be a similar case as well as difficult to define what is actually being required. I recommend the removal of these two criteria to ensure that the policy is compatible with Secretary of State advice and policy.

Recommendations

At the end of the first paragraph, insert “where it is relevant to the proposal”

In the fifth bullet point replace “and is not suburban in character” with “and is in keeping with local boundary treatments”

Delete the seventh, ninth and tenth bullet points

Policy FITT 6- New Community Shop

52. I saw on my site visit that the shop/café and the accompanying children's play area was already in place and are clearly well used. The Parish Council has agreed that this policy now serves no useful purpose and has confirmed that it was no longer appropriate to include the policy in the plan. The neighbourhood plan's role in supporting the new facility can be referenced in the supporting text.

Recommendation

That the policy be deleted

Policy FITT 7- Extensions to existing dwellings

53. There are number of issues with the policy as submitted. While I welcome the recognition that the existence of permitted development rights is very relevant to the consideration of a proposal for residential extensions, the policy as submitted could lead to a contradiction, wherein the policy seeks to retain small dwellings (as defined as under 100 m²) yet the potential of permitted development rights could undermine that aspiration by allowing extensions that breach that threshold. How would a proposal to extend an existing property which was 95 sq.m be determined if its permitted development allowance would allow a greater increase than 50sq. m or indeed the 30% allowance? I propose to delete the criterion that seeks to retain small dwellings.
54. I also consider that setting the percentage limit of 30% to be a too arbitrary figure and I proposed to refer to the criteria being "approximately 30%". I considered that greater clarity should be provided, by inserting "whichever is greater", which recognises the scope of extensions to be built under the permitted development rights, albeit that these are more limited in the National Park.

Recommendations

Delete criterion b)

Insert at the end of c) (to be renumbered) "approximately" before "30%" followed by "whichever is greater"

Policy FITT 8 - New Housing Development

55. The policy presently presumes in favour of developments within the settlement boundary which now includes the two allocation sites. I consider that any location within the settlement boundary will have, by virtue of the size and configuration of the village, have easy access to public transport. I do not consider that it is reasonable for development in the village itself, to have as a matter of course to mitigate *any* impact on the local transport network, unless the scale of that residual impact is *severe*, which is the criterion used by the Secretary of State in the paragraph 32 of the NPPF (2012).

56. I consider that the wording of criterion c) is too vague when it refers to “peoples’ needs”. I consider that any developments could be said to be meeting some person’s needs. I consider the more appropriate criterion would be that the development should be meeting “local housing needs.” The final sentence could be open to misinterpretation where the policy states that it will be applied to “new build and resale on the sites within the plan”. I questioned what the intention of the Parish Council was in terms of the above requirement and it was confirmed that the intention was for affordable housing to remain affordable in perpetuity. I will make it explicit that appropriate measures be made to ensure that these homes remain affordable, for future eligible households.
57. The policy dealing with residential development outside settlement boundaries is actually more restrictive than national or local plan policy, as it does not allow for replacement dwellings, exception sites, new homes created by the conversion of redundant or disused buildings, which lead to the enhancement of the immediate setting or new houses where the design of the dwelling is of exceptional quality or innovative nature. I will expand the range of homes allowed to ensure that it accords with the Secretary of State’s policy.

Recommendations

Insert the new “Fittleworth Housing and Settlement Boundary Allocations Plan” instead of the plan below the text of Policy FITT 9

Delete a)

In b) replace “Opportunities should be taken where appropriate” with “Measures are to be taken” and after “network” insert “where the residual impact is severe”

In c) replace “people’s” with “local housing”. After “policies” in the second sentence, add “and including measures to ensure that it remains affordable in perpetuity.” Delete the final sentence.

In the final paragraph after “forestry” insert “, replacement dwellings, exception sites, new homes created by the conversion of redundant or disused buildings, which lead to an enhancement of the immediate setting or new houses where the design of the dwelling is of exceptional quality or innovative nature”

Policy FITT 9– Sites Allocated for Housing Development sites

58. I am satisfied that the housing site selection has been carried out on an objective basis. The respective justification for the sites chosen, which is set out in the wording of the policy, is not actually planning policy but the reasons why the sites have been chosen. These sections should be omitted from the policy and be relocated in the supporting text.
59. The National Park Authority has pointed out that whilst the affordable element of the policy was in line with the LPA’s policy at the time of drafting, the Local Plan policy has evolved as it has gone through the local plan preparation

process and that the now adopted South Down's policy would require two affordable houses to be provided on site, one of which should be an affordable rented tenure. There are implications for the second site where the affordable housing requirement sought by the National Park is now 50%, not 40%. I will again recommend a change.

60. In terms of site b) (CH033) at the corner of Limbourne Lane / The Fleet, I do not consider that is appropriate to include a requirement for the development to ensure "appropriate measures are taken to manage the speed of traffic entering the village on the A283". This will be a requirement that is outside the control of the landowner or developer, and may require additional regulatory consents such as Traffic Regulation Orders etc. These are matters which fall under the jurisdiction of West Sussex County Council, the local highway authority rather than the National Park Authority. It is not a policy for the use and development of land. However, the residents' desire to see the existing issue of vehicle speeds through the village addressed, can be included in the plan, as a specific Community Aspiration which should be directed to the Highway Authority to consider, rather than placing the expectations on the developers of land, which the plan allocates for housing. The allocation of new homes should not be conditional upon such measures being approved when those measures are not required as a result of that development.
61. I will also be requiring changes to the two elements that deal with bat protection to bring them into line with the requirements set out by Natural England.
62. The last part of the policy dealt with windfall sites, within the settlement boundary and highlights the potential for development at Greatpin Croft. Housing development within the settlement boundary is already covered by Policy FITT 8 and it is unnecessary to include these matters in the policy specifically allocating land for new development

Recommendations

In the first paragraph, remove (rejected sites are discussed at Appendix 9) and move to the supporting text.

Replace a) ii) with "Two affordable dwellings will be secured on site, in perpetuity, at least one of these dwellings should be a rented affordable tenure".

In a) vii) and b) viii) replace "limiting" and insert "avoiding" and omit "to no greater than 0.5lux"

In b) i) replace "40" with "50"

Remove the final paragraph before b) and move to the supporting text

In b) delete v) and renumber

Remove the remainder of the policy after x)

Referendum Area

63. If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance, I can confirm that the area of the Fittleworth Neighbourhood Plan as designated by the South Downs National Park Authority on 5th March 2015, is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

Summary

64. I must congratulate Fittleworth Parish Council on grasping the opportunities presented by neighbourhood planning to allow the community to shape its planning policies.

65. This is a locally distinct neighbourhood plan, which will provide a sound basis for dealing with planning applications in the Parish in the coming years.

66. The changes I have had to make are all required to ensure that the policies comply with the basic conditions.

67. To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and that it is appropriate, if successful at referendum, that the Plan, as amended, be made.

68. I am therefore delighted to recommend to the South Downs National Park Authority that the Fittleworth Neighbourhood Development Plan, as modified by my recommendations, should now proceed to referendum.

JOHN SLATER BA(Hons), DMS, MRTPI
John Slater Planning Ltd
3rd July 2019