

Henfield Neighbourhood Development Plan 2017-2031

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

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Executive Summary

- 1 I was appointed by Horsham District Council in March 2020 to carry out the independent examination of the Henfield Neighbourhood Development Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood plan area on 17 March 2020.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding local character and providing a context within which new homes can be accommodated. In this context it proposes the allocation of four housing sites. It also proposes a series of local green spaces. In the round the Plan has successfully identified a range of issues where it can add value to the strategic context already provided by the wider development plan.
- 4 The Plan has been underpinned by community support and engagement. It is clear that all sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report I have concluded that the Henfield Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area.

Andrew Ashcroft
Independent Examiner
11 May 2020

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Henfield Neighbourhood Development Plan 2017-2031 (the 'Plan').
- 1.2 The Plan has been submitted to Horsham District Council (HDC) and the South Downs National Park Authority (SDNPA) by Henfield Parish Council in its capacity as the qualifying body responsible for preparing the neighbourhood plan. A small part of the neighbourhood area is within the South Downs National Park.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) 2012 and its updates in 2018 and 2019. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether or not the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted plan has been designed to be distinctive in general terms, and to be complementary to the development plan in particular. It has a clear focus on promoting new housing and employment growth and ensuring good design standards.
- 1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the Plan area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

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

Examination Outcomes

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

Other examination matters

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

3 Procedural Matters

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

- the Submission Plan;
- the Housing Needs Assessment (AECOM) 2017;
- the State of the Parish Report (February 2018);
- the Henfield Parish Design Statement (October 2019);
- the various other appendices and background documents of the Plan;
- the Basic Conditions Statement;
- the Consultation Statement;
- the Sustainability Appraisal Report (June 2019);
- the non-technical summary of that report;
- the Sustainability Appraisal Addendum (October 2019)
- the HRA Screening Report;
- the Parish Design Statement;
- the Parish Council's responses to my Clarification Note;
- the District Council's responses to my Clarification Note
- the representations made to the Plan;
- the adopted Horsham District Planning Framework 2015;
- the adopted South Downs Local Plan 2019;
- the National Planning Policy Framework (2019);
- Planning Practice Guidance (March 2014 and subsequent updates); and
- relevant Ministerial Statements.

3.2 I carried out an unaccompanied visit to the neighbourhood area on 17 March 2020. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. My visit is covered in more detail in paragraphs 5.9 to 5.16 of this report.

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

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 the Parish Council has prepared a Consultation Statement. This Statement sets out the mechanisms that were used to engage the community and statutory bodies in the plan-making process. It also provides specific details about the consultation process that took place on the pre-submission version of the Plan (June to July 2019). It captures the key issues in a proportionate way and is then underpinned by more detailed appendices.
- 4.3 The Statement is particularly helpful in the way in which it reproduces summaries of the outcomes of the various consultation exercises used throughout the plan-making process. Their inclusion adds life and depth to the Statement.
- 4.4 The Statement sets out details of the comprehensive range of consultation events that were carried out in relation to the initial stages of the Plan. They were designed around the overarching Community Engagement Strategy. They included:
- the organisation of parish surveys;
 - the preparation of articles in the BN5 magazine, the parish magazine and on the Henfield Hub website;
 - the organisation of drop in events in both Henfield (November 2017) and in Small Dole (August 2017);
 - the organisation of workshops with key partners, businesses and stakeholders;
 - the delivery of a letter to all households and businesses;
 - the organisation of a Housing Sites Open Day (May 2018);
 - the engagement with Upper Beeding parish Council on how Small Dole would be considered as part of the preparation of the two separate Plans; and
 - the engagement with HDC and the SDNPA.
- 4.5 I am satisfied that the engagement process has been both proportionate and robust. It sought to engage in a balanced way with local residents, statutory bodies, local businesses and potential developers.
- 4.6 Annexes A and B of the Statement provide specific details on the comments received on the pre-submission version of the Plan. It identifies the principal changes that worked their way through into the submission version. This process helps to describe the evolution of the Plan.

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

Representations Received

- 4.9 Consultation on the submitted plan was undertaken by HDC for a six-week period that ended on 20 December 2019. This exercise generated comments from a range of organisations as follows:

- UK Power Networks
- Surrey County Council
- Southern Water
- West Sussex County Council
- Natural England
- Seaward Properties Limited and Horsham District Council Property/Facilities Department
- Taylor Wimpey Strategic Land
- Wates Developments Limited
- Dowsett Mayhew Planning Partnership
- Horsham District Council
- Welbeck Strategic Land (II) LLP
- Campaign to Protect Rural Henfield
- Gladman Developments Limited
- Fairfax Acquisitions Limited
- Sweeptech Environmental Services
- Sandgates Developments Limited
- Historic England
- South Downs National Park Authority
- Built Heritage Matters
- Independent Age

- 4.10 The submitted Plan also generated representations from 29 local residents. The majority of these representations either supported the designation of the Old Kennels Site (Policy 3.1.5) for employment use or objected to the proposed designation of land at Parsonage Farm as a housing allocation (Policy 2.1).
- 4.11 I have taken account of all the representations received. Where it is appropriate to do so, I refer to particular representations in my assessment of the policies in Section 7 of this report.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area consists of the parish of Henfield. Its population in 2011 was 5349 persons living in 2405 houses. It was designated as a neighbourhood area on 4 February 2014 and on 13 December 2013 by HDC and the SDNPA respectively. It is located in the south-eastern part of Horsham District. The neighbourhood area is predominantly rural in character and much of its area is in agricultural use. The River Adur flows around the north and west sides of Henfield.
- 5.2 The principal settlement in the neighbourhood area is Henfield. It is located around the A281. It has an attractive and vibrant High Street which includes an attractive range of retail and commercial premises. As the Plan describes the current village represents the incorporation of the three distinct parts of the village. The first is the loose collection of dwellings to the west of the village off Church Street and Cagefoot Lane. They are connected by a series of attractive footpaths. St Peter's Church is the focal point of this area. The second is the High Street itself and the developments to the eastern side of this principal thoroughfare. Henfield Common provides an attractive open aspect in this part of the village and brings the countryside into its heart. The third is the more scattered development at Nep Town. The remainder of the village consists of more recent residential development of various ages.
- 5.3 The other principal settlement in the neighbourhood area is that part of Small Dole that falls within Henfield Parish. It is located to the south of Henfield on the A2037. The remainder of the neighbourhood area consists of a very attractive agricultural hinterland. The south-eastern corner of neighbourhood area is within the South Downs National Park.

Development Plan Context

- 5.4 The development plan covering the neighbourhood plan area is the Horsham District Planning Framework (HDPF) and the South Downs Local Plan. The HDPF was adopted in 2015 and covers the period up to 2031. It sets out to bring forward new growth that is proportionate to the size of the various settlements in the District. Policy 2 (Strategic Development) focuses development in and around Horsham itself together with other strategic development in Southwater and Billingshurst. Elsewhere it proposes an appropriate scale of development which would retain the overall settlement pattern in the District. Policy 3 establishes a settlement hierarchy. Within this context Henfield is identified as a Small Town/Larger Village (the second category in the hierarchy) and Small Dole as a smaller village (the fourth category). Policy 4 supports the expansion of settlements subject to various criteria being met. Policy 15 (Housing Provision) sets the scene for the strategic delivery of new housing. Beyond Horsham, Southwater and Billingshurst it identifies that 1500 homes should be delivered collectively across the District through neighbourhood plans in accordance with the settlement hierarchy.

5.5 In addition to the policies set out above the following policies in the HDPF have been particularly important in influencing and underpinning the various policies in the submitted Plan:

Policy 7	Economic Development
Policy 9	Employment Development
Policy 17	Meeting Local Housing Needs
Policy 26	Countryside Protection
Policy 32	Quality of New Development
Policy 43	Community Facilities, Leisure and Recreation

5.6 HDC has now embarked on the preparation of a new Local Plan. A draft Regulation 18 Local Plan was published for consultation between February and March 2020. It is anticipated that the Plan will be submitted for examination in Autumn/Winter 2020. In process terms this Plan is not at a stage at which it can have any significance in the examination of the submitted neighbourhood plan. Nevertheless, HDC has helpfully provided advice to qualifying bodies on how it anticipates that the emerging Plan will have a bearing on the well-developed neighbourhood planning agenda in the District.

5.7 The extreme south-eastern part of the neighbourhood area is located within the South Downs National Park. As such future development in this area is controlled by the adopted South Downs Local Plan which was adopted in July 2019. It is primarily a landscape-led Plan. Strategic Policies SD4,5 and 6 address Landscape Character, Design and Views respectively.

5.8 The submitted Plan has been prepared correctly and properly within this current adopted development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents in the District and in the National Park. This is good practice and reflects key elements in Planning Practice Guidance on this matter. It is also clear that the submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. In particular it grapples with the issue of housing delivery in the context of the adopted HDPF. This is captured in the Basic Conditions Statement.

Unaccompanied Visit

5.9 I visited the neighbourhood area on 17 March 2020. It took place before the Covid:19 travel restrictions were introduced. I maintained appropriate social distancing when I was in the neighbourhood area.

5.10 I drove into Henfield along the A281 from the north. This gave me an initial impression of its setting and the character. It also highlighted its connection to the strategic road system and to Cowfold to the north. I saw the nature of the road network and the way in which Henfield was located in the wider Vale of Sussex.

- 5.11 I looked initially at the village centre. I saw its vibrant range of retail and commercial business in an attractive, historic setting. I saw the way in which they had been incorporated into traditional vernacular buildings and the way in which commercial and residential uses co-existed in a relaxed fashion. I took the opportunity to look at the areas to the immediate east and to the west of High Street. To the east of the High Street I looked at the impressive Commons. They brought the countryside into the very heart of the village. To the west of the village I walked along Cagefoot Lane past the war memorial. I enjoyed the walk along the popular and well-used footpaths along the intersecting routes leading towards the Church.
- 5.12 Thereafter I looked at the various proposed housing allocations in the Plan. In particular I looked at the land north of Parsonage Farm given the significance of its yield within the overall provision included in the Plan. I also looked at the details of the access arrangements into the site off the Wantley Hill Estate (Policy 2.2). I took the opportunity to look at the scale, nature and location of the other sites which had been considered in the earlier phases of the plan-making process.
- 5.13 Throughout my visit I looked at the various proposed local green spaces. I saw their different sizes and uses. In the round I saw the way in which they contributed to the openness and attractiveness of certain parts of the village. In some cases, they reinforced its connections with the surrounding countryside. I looked in particular at the proposed designations which were areas of incidental open space so that I could come to a conclusion about the extent to which they met the criteria in the NPPF.
- 5.14 I then drove to the Henfield Business Park to the south of the village. I looked at the Business Park and the three sites on the opposite side of the A2037 that are proposed for employment use in the Plan. I looked in particular at their wider relationship with the surrounding countryside and to the main road network.
- 5.15 Thereafter I continued along the A2037 to Small Dole. I saw its range of retail and other commercial facilities. I also looked at the potential housing site that had been considered and dismissed.
- 5.16 I finished my visit by driving to Upper Beeding to the south. This highlighted the relationship between the Upper Beeding and Henfield in the wider landscape and the way in which their two respective neighbourhood plans had proceeded in relation to Small Dole.

6 The Neighbourhood Plan and the Basic Conditions

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

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

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

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

National Planning Policies and Guidance

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

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

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

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

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

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

Contributing to sustainable development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social and environmental. It is clear that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension the Plan includes policies that propose housing and employment allocations (Policies 2 and 3 respectively). In the social role, it includes policies on infrastructure and other related community facilities (Policies 5-9) and local green spaces (Policy 11). In the environmental dimension the Plan positively seeks to protect its natural, built and historic environment. It has specific policies on design (Policy 12) and on green infrastructure and biodiversity (Policy 10). The Parish Council has undertaken its own assessment of this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

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

European Legislation and Habitat Regulations – Sustainability Appraisal

- 6.14 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In order to comply with this requirement the Parish Council prepared a Sustainability Appraisal (SA) in June 2019. It incorporates a Strategic Environmental Assessment (SEA). The report is thorough and well-constructed. It appraises the policies (and reasonable alternatives) against the sustainability framework developed through the Scoping Report. It helps to gauge the extent to which the Plan contributes towards sustainable development. The work also builds on the earlier Housing Needs Assessment.
- 6.16 The work on the SA is underpinned by associated work on Site Assessments. A comprehensive range of potential housing sites were assessed by Plan4Localism and Action in Rural Sussex to determine their suitability and availability, or otherwise, for allocation in the emerging Neighbourhood Plan. The Site Assessment work is part of the evidence base for the Henfield Neighbourhood Development Plan. The sites assessed are those that the Parish Council was aware of through previous work, resulting from the 'Call for Sites' (August- October 2017) and from the representations made to the Regulation 14 consultation in June/July 2019. A minimum threshold of six dwellings for residential sites was set in order to be consistent with other similar assessments such as the Horsham District Council's Strategic Housing and Economic Land Availability Assessment (SHELAA).
- 6.17 HDC produced an Addendum to the SA in October 2019. In summary the Addendum looked again at sites which had not been considered in the original SA. On this basis it assessed five sites where their boundaries at that point either abutted sites which had planning permission or could be grouped into a wider cluster of sites that abut the built-up area boundary.
- 6.18 As a result, Sites A, B, DD and K1 were added back into the Sustainability Appraisal process. These sites are as follows:
- Site A Dears Farm Paddock, West End Lane;
 - Site B Land North/South of West End lane;
 - Site DD Land to the east of London Road; and

- Site K1 Land north of Furners Lane.

6.19 The combined effect of the June and the October elements of the SA generated a total of 11 potential options for strategic housing growth in the neighbourhood area as follows:

Within the original SA

Option 1 – This option would deliver 252 homes on 13 sites using a dispersed approach concentrated around the existing settlements. It would make use of the previously-developed land and nursery sites alongside some development on previously undeveloped land. This option would see 216 homes provided in Henfield and 51 new homes in Small Dole.

Option 2 - This option would provide development land for the delivery of 259 homes on 11 sites throughout the plan period. It would make use of a number of small brownfield and nursery sites that are currently in employment use.

Option 3 – This option would involve the use of two sites on the northern and north eastern side of Henfield. It would provide 280 new homes in total alongside allotments, formal and informal play areas, open space, flood alleviation to north and new nature reserve to the north and new playing fields east of Wantley Hill Estate. As a result, it would represent a northern expansion of the existing settlement of Henfield beyond the settlement boundary. This option would not allocate any other sites for residential development, leaving the development within the settlement boundary to come forward in accordance with policy.

Option 4 – This option would provide a single allocation on the eastern side of Henfield encompassing Sites C and K2. The option would deliver 265 homes and playing fields east of Wantley Hill Estate. The SA comments that there may be scope to include a small part of Site DD to provide one large comprehensive and linked allocation along the eastern side of Henfield. However, for the purposes of this assessment it was not been included as the area that would be required would not affect the overall assessment.

Option 5 – This option builds upon the previous options considered. It would bring forward 270 homes and seeks to disperse development around Henfield so that the impact of development is spread. This option would still result in site Xa coming forward but at a lower density which has the potential be more in keeping with the countryside location.

Option 6 – This option would disperse development on both the northern, eastern and western edge of Henfield. It would deliver approximately 280 homes on four sites and would present the potential creation of countryside buffer to the north of the village. This option would represent an expansion of Henfield into open countryside

Within the Addendum to the SA

Option 7 – This option would provide a single allocation on the north eastern side of Henfield (Site DD). The option would deliver 600 homes and playing fields on land to the east of London Road. This option would represent an eastern expansion of Henfield into open countryside. The Henfield Waste Water Treatment works is located in the northern portion of this site and would render development within the immediate vicinity in this area unfeasible due to odour issues. Access to the site would be via the A281 subject to approval from West Sussex County Council.

Option 7a – This option would provide a single allocation on the north eastern side of Henfield encompassing Sites C and DD. It would represent an eastern expansion of Henfield into open countryside.

Option 8 – This option would provide a single allocation on the south western side of Henfield encompassing Sites A, B (north and south), Q and W. The option would deliver 308 homes with some affordable and open market dwellings together with open space within the site.

Option 9 – This option would provide a single allocation on the eastern side of Henfield encompassing Sites K1 and K2. The option would deliver 465 homes with open space and potentially other facilities on land north of Furners Lane, Henfield.

Option 10 – This option 10 would provide a single allocation on the south-western boundary of Henfield. The option encompasses a number of smaller sites listed below and would deliver 276 homes together with sports facilities and public open space.

- 6.20 The June 2019 SA dismisses options 1/2/3/4 and 6. It concludes that Option 5 is its preferred option. It acknowledges that some of the options scored more favourably against the sustainability objectives than option 5. Out of the options considered, options 2 and 3 had the least negative impacts, followed by option 5 and option 1. Option 6 had the same score as option 5. Overall, however, the SA recognised that within the context of the Horsham District Planning Framework, Henfield is defined as a larger village and is a relatively sustainable location for development. It also concludes that the differences in the sustainability of the different options are marginal. It also comments about the extent to which the negative impacts can be offset through a range of avoidance, reduction and mitigation measures. Overall, therefore it is considered any of the options (subject to mitigation which would be expected through planning policies, conditions and so on) would contribute to achieving sustainable development.
- 6.21 Given that all options would achieve the delivery of sustainable development in some form, the Parish Council considered option 5 to be its preferred option. This option provides a new road access on to the A281, which minimises impacts on the existing community and its amenities. The option would provide a nature reserve which will be a significant community asset and will be a buffer to limit the impact on the wider open

countryside. The SA also comments that Option 5 would deliver development at a consistent density to other greenfield sites tested in other options (other than option 3).

- 6.22 The SA Addendum comments about the relationship between the additional options and those already addressed in the June 2019 SA. Taking account of the additional five options considered, it concludes that none would be more sustainable than those assessed in the original SA/SEA report and concludes that Option 5 remains the most appropriate option to take forward. It comments that three of these additional options (7, 7a and 9) would deliver a far greater quantum of development than required to meet the identified housing need. On this basis it concludes that this amount of new housing growth would represent an inappropriate scale and function for the size of Henfield.

Commentary on the SA process

- 6.23 Plainly the SA process undertaken has been both comprehensive and exhaustive. It considered 28 potential residential development sites and arranged them into 11 alternative options. The work undertaken has been underpinned by professional and technical advice. In particular the consideration of alternative options has been very thorough. In their different ways the options would deliver the Parish Council's assessment of strategic housing need in the neighbourhood area. As such the various options would have different implications on the shape and character of Henfield and its relationship with the surrounding countryside.
- 6.24 One of the representations suggests that the production of an Addendum (October 2019) to the original SA (June 2019) does not comply with European legislation. I have considered this matter very carefully. Clearly the production of an Addendum to a SA is not a common occurrence. Nevertheless paragraph 3.6 of the Addendum clearly identifies the circumstances which generated its need and production. They reflected the outcomes of the Regulation 14 consultation exercise and took account of the various sites (as addressed in the Addendum) which at that point either abutted sites which had planning permission or which could be grouped into a wider cluster of sites which abut the built-up boundary of Henfield. In this context the SA process was iterative in responding to changing circumstances in the plan-making process. In addition, the SA Addendum was included in the package of documents with the submitted Plan and was subject to consultation at the Regulation 16 stage. Several site owners and promoters acknowledged the appropriateness of the Addendum process. In any event the assessment undertaken in the Addendum clearly demonstrated that its additional options would not perform better than the preferred option (or indeed other options) in the original SA. In these circumstances I am satisfied that the Addendum to the original SA was appropriate and meets the basic conditions.
- 6.25 Within the wider context of the SA and the SA Addendum I am satisfied that the Parish Council has selected a preferred residential development option which is both appropriate to the characteristics of the neighbourhood area and is based on the evidence in the SA work. Paragraphs 6.20 to 6.22 of this report have already addressed this matter and I will not repeat the details here. The evidence clearly supports the Parish Council's decision to incorporate Option 5 within the submitted Plan.

- 6.26 The decision-making process in the plan has followed two important principles. The first is that the SA process provides the details for the decision-maker to reach a decision on the most appropriate development option to incorporate within the Plan. This reflects advice in the Office of the Deputy Prime Minister's 'A Practical Guide to the Strategic Environmental Assessment Directive 2005' which comments:

'It is not the purpose of the SEA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental performance of alternatives, and can make the decision-making process more transparent' (ODPM 2005 paragraph 5.B.7)

- 6.27 The second principle is that the Plan does not necessarily need to incorporate the option which performs best against the SA objectives. This reflects advice in Planning Practice Guidance which comments:

'This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the plan' (PPG 11-001-20190722)

- 6.28 Some of the representations have commented about the strategic figure which the neighbourhood plan is looking to achieve. In particular my attention has been drawn to the NPPF which comments about the requirement for a local planning authority (here HDC) to provide a housing requirement figure for designated neighbourhood areas. I have considered this matter very carefully in the context of the current version of the NPPF, the evolution of the neighbourhood plan at that time and the way in which the Parish Council has identified the indicative figure of 270 homes included in the submitted Plan.

- 6.29 The current version of the NPPF was published in February 2019. It updated elements of the July 2018 version of the NPPF. The 2018 version of the document introduced important elements into national policy with regard to the way in which neighbourhood plans are expected to deliver their part of the wider strategic delivery of housing in the relevant local planning authority area. These elements remained unaffected in the 2019 version of the NPPF. They comment as follows:

'Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. 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. 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 affects the requirement’ (NPPF paragraph 65)

‘Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority’ (NPPF paragraph 66)

6.30 In July 2018 the neighbourhood plan was being prepared. The key elements of the Plan on future housing delivery have been significantly underpinned by the Housing Needs Assessment (HNA) undertaken by AECOM and published in October 2017. This approach was recommended to Henfield Parish Council and other parish councils by HDC to identify their various proportions of the wider 1500 dwellings required for small towns and larger villages in the context of the adopted HDPF. The AECOM HNA provided a comprehensive analysis of housing needs in the neighbourhood area. In particular it considered the following issues:

- employment trends;
- housing transactions (prices);
- housing transactions (volumes);
- migration and demographics;
- overcrowding and concealment; and
- rate of development.

6.31 The HNA estimated the quantity of housing need in the neighbourhood area from five sources as follows:

- Horsham District Planning Framework ‘settlement hierarchy’ minimum derived figure (HDPF) 2011-31: this generates a projection of 0 dwellings over the plan period given that the projection for the area has already been satisfied;
- Horsham District Planning Framework ‘district’ minimum derived figure (HDPF) 2011-31: this generates a projection of 529 dwellings over the plan period or 38 homes per year (rounded);
- Housing Need in Horsham 2015 (SHMA) - proportional share drawn from OAN: this generates a final target of 388 dwellings over the plan period, or 28 per year (rounded);
- DCLG Household projections: this generate a re-based projection of dwellings of 400, or 29 dwellings (rounded) per year over the plan period; and
- A projection derived from homes growth between 2001 and 2016: this generates a target of 301 homes over the plan period.

The second projection was excluded from the averaging exercise across the five sources given the strategic approach taken for larger towns and smaller villages in the

adopted HDPF. The average of the remaining projections is 272 dwellings, or 19 dwellings per year over the Plan Period.

- 6.32 Within the strategic requirements set by the AECOM assessment the various Focus Groups were assembling evidence and making their various reports. The call for sites took place in August to October 2017. The various elements of work led to the publication of the pre-submission Plan in June 2019 for consultation.
- 6.33 In this context the preparation of the neighbourhood plan has overlapped with the preparation of the emerging Horsham Local Plan. At the time of the introduction of the July 2018 version of the NPPF HDC was working to the HDPF (as adopted in 2015). It requires Henfield to deliver an unspecified number of dwellings within an overall amount required for smaller towns/larger villages in the HDPF. Similarly, at that time there was no clarity on the direction of travel for the emerging Local Plan in general, and its strategic housing target in particular.
- 6.34 I sought advice from HDC about the extent to which it considered that the submitted neighbourhood plan was in general conformity with the adopted HDPF. It advised that ‘.....the 270 dwellings proposed in the Henfield Neighbourhood Plan is in general conformity with Policy 15 (4) of the HDPF and represents 18% of the total neighbourhood plan requirement identified in the HDPF. Given the position of Henfield in the settlement hierarchy, (Policy 2 & 3) the District Council considers that this is an appropriate, sustainable and important proportion of the (at least) 1,500 new homes required from neighbourhood plans under Policy 15 (d)’
- 6.35 In these circumstances I am satisfied that the approach taken by the Parish Council (and as supported by HDC) in working towards the delivery of 270 homes was appropriate in the local circumstances. I am also satisfied that it has regard to national policy. In particular I am satisfied that they have regard to paragraph 66 of the NPPF. The figure of a minimum of 270 homes reflects the population of the neighbourhood area and the most recently available planning strategy of the local planning authority. It builds on the work undertaken in 2017 on the Housing Needs Assessment by AECOM. It also acknowledges that the strategic allocation was already set in the HDPF and that there was no alternative certainty in the emerging Local Plan. Nonetheless I recommend that the broader issue of housing delivery in the submitted Plan is reviewed once the emerging Local Plan has been adopted. This matter is addressed in more detail in paragraph 6.40 of this report.
- 6.36 The accuracy of various assessment in both the SA and the SA addendum have been queried by the promoters of alternative housing sites which have not been included as allocations in the Plan. They are as follows:
- Seaward Properties Limited and Horsham District Council Property and Facilities Department various scores on Site D2 and part of Site U;
 - Taylor Wimpey – various score on Site DD;
 - Dowsett Mayhew – various score on Site W;
 - Fairfax Acquisitions – various scores on Site F; and
 - Sandgates Developments – various scores on Site Q

- 6.37 I have considered these representations very carefully given the importance of housing delivery within the wider Plan and the requirements for the SA process to be robust in the way that it complies with EU regulations and therefore the basic conditions. On the basis of all the evidence available to me I am satisfied that the work that has been undertaken in the site assessment, the SA and the SA Addendum has been independent, evidence-based and proportionate to the task in hand.
- 6.38 In reaching this conclusion I have taken account of three related factors. The first is that the various tasks have been undertaken in a proportionate fashion. Whilst there will inevitably be a degree of professional judgement on the part of the organisations undertaking the work the various disputed assessments within the SA/SA Addendum are neither unreasonable nor improbable. This approach reflects the advice in the Office of the Deputy Prime Minister's 'A Practical Guide to the Strategic Environmental Assessment Directive 2005' which comments that:
- 'Predictions do not have to be expressed in quantitative terms. Hard data may enable Responsible Authorities or expert advisers to make detailed quantitative predictions, and this can be particularly useful where a plan's or programme's effects are uncertain, close to a threshold, or cumulative. However, quantification is not always practicable, and qualitative predictions can be equally valid and appropriate. In current practice, these are often expressed in easily understood terms such as 'getting better or worse' or a scale from ++ (very positive) to -- (very negative). It can be useful to link predictions to specific objectives' (ODPM 2005 Section B3)*
- 6.39 The second is that the various representations do not identify how any changes in the assessment of the sites concerned on the individual SA objectives would otherwise affect the overall assessment of the site and therefore its comparison with other reasonable alternatives. The third is that, in any event, the SA and Site Assessment work has been designed to assist the Parish Council in its decision-making process rather than to provide prescriptive or absolute advice. This is made clear both in the Site Assessment report (paragraph 1.2) and in the SA (paragraph 2.6).
- 6.40 Plainly the approach in the neighbourhood plan has the ability to be overtaken by the eventual approach taken in the emerging Local Plan. In a broader context in the event that there is any conflict between policies in the development plan greater weight would be given to the policies in the Plan which has most recently become part of the development plan. This position is acknowledged by the Parish Council in its response to my question on this matter in the clarification note. It explained the way in which the Plan has addressed the issue. It then comments that '(it) was decided therefore to proceed with the current Neighbourhood Plan to be examined against the currently adopted Horsham District Planning Framework, and to leave any uplift in housing numbers to be determined through the emerging Local Plan. This could include the Local Plan allocating additional sites if that was considered necessary and sustainable. Once the new Local Plan is adopted then the Neighbourhood Plan would be reviewed to see if any policies require updating'
- 6.41 In this context I recommend in paragraphs 7.116 to 7.120 that the review process included in the Plan is consolidated. The recommended modifications make a direct

connection with the local arrangements that have already been discussed and agreed between the Parish Council and HDC.

- 6.42 This approach is particularly important given the contents of the emerging Local Plan. Whilst it does not identify specific housing allocations at this stage it identifies a series of potential sites which could contribute towards its longer-term strategic housing target. In the case of the neighbourhood area the Site Assessment report (February 2020) includes the following potential sites:

SA005 Land east of Fillery Way, Henfield (approximately 100 homes).

SA011 Land west of Backsettown Farm, Henfield (approximately 30 homes).

SA065 Land off Wantley Hill, Henfield (approximately 25 homes).

SA317 Sandgate Nursey, Henfield (approximately 55 homes).

SA504 Land south of the Bowls Club, Henfield (approximately 10 homes).

SA686 Land at Parsonage Farm, Henfield (approximately 205 homes).

SA538 Land west of Shoreham Road, Small Dole (approximately 40 homes).

SA505 Land at Highdown Nursery, Small Dole (approximately 11 homes).

- 6.43 Given that the preparation of the Local Plan and the neighbourhood plan have overlapped it is not surprising that there is a close relationship between the sites identified in the Local Plan Site Assessment Report and those proposed for residential development in the submitted neighbourhood plan. Similarly, some of the sites considered as potential sites in the emerging Local Plan are those which have been considered as reasonable alternatives in the submitted neighbourhood plan. Whilst the outcome of the emerging Local Plan remains uncertain it is clear that there is the potential for additional development to be incorporated within the neighbourhood area within the emerging Local Plan.

- 6.44 The Campaign to Protect Rural Henfield has drawn my attention to a recent appeal decision in relation to land at Sandy Lane, Henfield. As an organisation it suggests that the Plan, and its assessment of reasonable alternatives, has not taken account of the Planning Inspector's findings on this appeal decision. I have read the appeal decision and considered this matter very carefully. Having done so I am satisfied that there is no inconsistency between the approach taken in the submitted Plan and this appeal decision. In a general sense the appeal decision relates to the details of a planning application on a specific site. In addition, the submitted Plan addresses a series of potential housing sites against an extensive range of environmental issues which overlap with those considered by the planning inspector on the Sandy Lane site. In any event the two processes are very different – a neighbourhood plan is preparing new policies for the identified Plan period whereas the appeal process is assessing the appropriateness or otherwise of a specific development on a single site in the context of existing planning policies.

European Legislation and Habitat Regulations – Habitats Regulations Appraisal

- 6.45 HDC has produced a separate Habitats Regulations Assessment (HRA) of the Plan. It concludes that the Plan is not likely to have significant environmental effects on a European nature conservation site or undermine their conservation objectives alone or in combination taking account of the precautionary principle. As such Appropriate Assessment is not required.
- 6.46 The HRA report is very thorough and comprehensive. It takes appropriate account of the significance of the following sites:
- Arun Valley SPA/Ramsar;
 - Arun Valley SAC;
 - the Mens SAC; and
 - the Ashdown Forest SAC

It provides assurance to all concerned that the submitted Plan takes appropriate account of important ecological and biodiversity matters.

- 6.47 The HRA report also includes the necessary assurance on the potential impact of the growth proposed in the submitted Plan on the delivery of 1500 new houses in the District required generally through neighbourhood plans (Policy 15 of the Horsham District Planning Framework). Overall, the total number of dwellings which have been identified to be delivered through neighbourhood planning (including the 270 dwellings in the submitted Plan) equates to a total of approximately 1438 homes. It concludes that the overall quantum of development is within that assessed in the HRA of the HDPF and no additional impacts will arise in this respect.
- 6.48 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of European obligations.
- 6.49 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On the basis of all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

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

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. In particular, it makes a series of recommended modifications to ensure that they have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and the Parish Council have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (41-004-20170728) which indicates that neighbourhood plans must address the development and use of land. The Plan also includes a series of Community Aims. They are appropriately distinguished from the principal land use policies by the use of colour.
- 7.5 I have addressed the policies in the order that they appear in the submitted plan. Where necessary I have identified the inter-relationships between the policies. The Community Aims are addressed after the policies.
- 7.6 For clarity this section of the report comments on all policies whether or not I have recommended modifications in order to ensure that the Plan meets the basic conditions.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial section of the Plan (Sections 1-4)

- 7.8 These initial parts of the Plan set the scene for the range of policies. They do so in a proportionate way. The Plan is presented in a thorough way. It makes a very effective use of well-presented maps and photographs. A very clear distinction is made between its policies and the supporting text. It also highlights the links between the Plan's objectives and its resultant policies.
- 7.9 The Introduction comments about the development of the Plan. It also provides background information on the wider national agenda on neighbourhood plans within which it has been prepared. It identifies the neighbourhood area. Whilst the front cover identifies that the Plan period is 2017 to 2031 this matter is not directly included in the Plan itself. For clarity I recommend a modification to the Plan to address this important procedural matter.

At the end of paragraph 1.2 add: 'The Plan period is 2017-2031'

- 7.10 Section 2 comments about the neighbourhood area and a range of matters which have influenced the preparation of the Plan. It includes a section on Community Views and

the Strength, Weaknesses, Opportunities and Threats associated with the neighbourhood area. It is a very helpful context to the neighbourhood area. It also provides a backcloth to the various policies.

- 7.11 Section 3 comments about the planning policy context within which the Plan has been prepared. It comments about both the Horsham District Planning Framework and the South Downs Local Plan in a very professional way. It gives confidence that the Parish Council has properly sought to develop a Plan which is in general conformity with the strategic policies of the development plan.
- 7.12 Section 4 comments about the Plan's Vision and Objectives. It is well-constructed. It describes how the Vision and the Objectives of the Plan were developed. The objectives are grouped under the following five headings – Housing, Environment, Infrastructure and Facilities, Transport and Economy. Its key strength is the way in which the objectives directly stem from the Vision.
- 7.13 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy 1: A Spatial Plan for the Parish

- 7.14 This policy sets out a spatial plan for the wider parish. It defines built up area boundaries for Henfield and Small Dole and offers support to development within these locations. Elsewhere in the neighbourhood area the Plan expects development to conform with policies for the countryside in the Local Plan. It draws particular attention to the statutory duties in relation to the SDNP.
- 7.15 The policy approach has attracted a degree of commentary from the development industry. It is suggested that the approach is restrictive and conflicts with national policy. I have considered these representations very carefully. On balance I am satisfied that the Plan takes a positive approach towards new development in the Plan period. In particular it includes four residential and three employment allocations. The residential allocations are shown within an extended built up area boundary of Henfield. In addition, the policy does not prevent development elsewhere in the neighbourhood area given its approach which makes the relationship with development in the countryside which is supported in HDPF policies. I recommend that the second part of the policy is broadened so that it also relates to national policy and to local policy in the South Downs Local Plan.
- 7.16 The third part of the policy overlaps with the second. It comments that where agricultural land is needed for development areas of poorer quality land will be preferred to that of a higher quality. Whilst this approach has a degree of merit it would be difficult to apply through the development process. In any event it expresses a preference rather than identifying a policy approach. I recommend that it is deleted and that the matter is addressed more generally in the supporting text. Subject to a minor modification to the wording of the fourth part of the policy I am satisfied that it meets the basic conditions.

In P1.2 replace

- ‘will be required to’ with ‘will be supported where they’
- ‘HDPF policies’ with ‘as appropriate to their location in the neighbourhood area to HDPF policies with ‘national, HDPF and South Down Local Plan’

Delete P1.3

In P1.4 replace ‘must’ with ‘should’

At the end of paragraph 5.6 add:

This approach also seeks to retain the relationship of Henfield with its surrounding countryside. In the event that additional development comes forward outside the identified built up area boundaries it should seek to use lower quality agricultural land to safeguard higher quality land in this use’

Policy 2: Housing Site Allocations

- 7.17 This policy allocates four sites for residential development. They feature as four free-standing policies as follows:

Policy 2.1 Land at Parsonage Farm
205 dwellings

Policy 2.2 Land east of Wantley Hill Estate
25 dwellings

Policy 2.3 Land west of Backsettown, off Furners Lane
30 dwellings

Policy 2.4 Land south of the Bowls Club, off Furners Mead
10 dwellings

- 7.18 The site selection process has been considered in Section 6 of this report. I do not repeat those details. Nevertheless, I comment on the extent to which the four allocated sites meet the basic conditions on a site-by-site basis. However, to avoid repetition in the four separate policies I address three general issues in the round as follows:

- the impact of the preferred option on the form and character of Henfield;
- the criteria associated with the development of the four sites; and
- the deliverability of the sites identified in the Plan.

- 7.19 In general terms I am satisfied that the four proposed housing allocations will have an acceptable impact on form and character of Henfield. In particular they will retain its overall shape and balance on either side of the A281/High Street. Three of the four sites also incorporate landscape areas/open spaces/sports areas on their outer edges where they would be adjacent to the surrounding countryside. In their different ways

this type of development will make a major contribution to the social and the environmental dimensions of sustainable development.

- 7.20 The criteria associated with the four policies include elements of common application and wording. This provides a degree of consistency and robustness. At the same time each policy includes criteria which reflect the particular and distinctive features of the site concerned. In general terms the criteria associated with each policy are comprehensive and have been crafted to ensure that high quality and well-designed development comes forward.
- 7.21 Several of the criteria require that development ‘has regard’ to a series of identified matters. I recommend in turn that more perspective language is used in the various criteria. This will bring the clarity required by the NPPF. To reduce duplication, I will not repeat this explanation for the recommended modifications on a policy-by-policy basis.
- 7.22 In a similar fashion several of the criteria require that development should maintain and enhance certain features that relate to the site concerned. In some cases, a degree of enhancement will be practicable. In other cases, this may not be the case. In general terms the development of the sites concerned will have an inherent impact on their character and appearance. This issue has already been considered in the SA work and the wider preparation of the Plan. I recommend that this issue is reflected in the various criteria. This will bring the clarity required by the NPPF. To reduce duplication, I will not repeat this explanation for the recommended modifications on a policy-by-policy basis.
- 7.23 I sought advice from the Parish Council on the deliverability of the allocated sites. I was advised that ‘(as) part of the Site Assessment Report the availability and deliverability of each site was checked with site proponents and the proponents of the allocated sites confirmed that their sites could be delivered. The Parish Council is satisfied that there are no significant impediments to the viability or deliverability of the allocated sites’
- 7.24 On the basis of all the information available to me I am satisfied that there are no significant impediments to the deliverability of the submitted package of sites. I can also see that there is a significant degree of interest in their eventual development in general, and in relation to the development of the site to the north of Parsonage Farm in particular.

Policy 2.1 Land at Parsonage Farm

- 7.25 This is an important policy within the wider context of the Plan. It is the largest of the four proposed housing allocation sites. It is located on the north-western edge of Henfield and to the immediate north of the Deer Park/Fawn Rise residential development.
- 7.26 The format and extent of the site has been carefully considered. Open space is proposed along its northern edge to safeguard the longer-term relationship between the village and the surrounding countryside. In addition, the development of the site is proposed to be associated with the developed of a new access road from the A281 to

its east. These matters are addressed in a general criterion which requires the site to be developed on the basis of a masterplan which reflects the character of the site and its wider landscape setting. They also feature in bespoke criteria within the policy.

- 7.27 Criterion p requires that the new access road is built in advance to allow construction traffic access. Criterion u also requires that the occupation of the development is phased to align with the delivery of existing sewerage infrastructure in liaison with the service provider. I sought advice from the Parish Council on the former issue. Plainly both issues are important to the sustainable development of the site. Nevertheless, I recommend detailed modifications to both criteria so that they do not artificially delay the development of the site or impact on its commercial viability. The modification on the access requirements reflects the information in the Parish Council's response to the clarification note. The modification to the sewerage issue takes a more general approach. In any event the relationship between the development of the site will be determined by HDC at any future planning application stage and/or by detailed agreements between the developer and other relevant service providers.
- 7.28 I also recommend associated modifications to the supporting text. In several cases it explains the context to the policy in an undeveloped way.
- 7.29 I also recommend other modifications so that the policy and its criteria have the clarity required by the NPPF. Otherwise it meets the basic conditions.

Replace 'to ensure that the following requirements are met' with 'and the following criteria'

In b replace 'has regard for' with 'takes account of'

**In c replace 'Generally.... height' with 'Dwellings should be two storeys in height'
In the second sentence replace 'accepted' with 'supported'**

In d replace 'has regard for' with 'takes account of'

In e replace 'will be retained and enhanced' with 'should be retained and where practicable enhanced'

In f delete 'All'

In g replace 'is' with 'should be'

In h replace 'will be' with 'should be'. In the second sentence delete 'Support is given to' and add at the end 'will be supported'

In i replace 'is' with 'should be'

In j replace 'avoids possible fragmentation of community' with 'promotes its association with adjoining communities'

In k replace ‘must’ with ‘should’ and delete ‘irrespective.... Authority’

In l replace ‘is’ with ‘should be’

In p replace ‘includes’ with ‘incorporates’ and ‘this is built.... access’ with ‘is initially available to allow access for construction traffic and the initial phase of residential development’

In q replace ‘All lighting is’ with ‘Any external lighting should be’

In r replace ‘delivers’ with ‘should deliver’

In t replace ‘has regard to’ with ‘takes account of’

Replace u with: ‘The development of the site delivers any reinforcement of the sewerage network which directly arises from the construction of the proposed new homes’

Replace v with: ‘The layout of the site provides appropriate access to sewerage infrastructure for maintenance and any potential improvement works’

Replace w with: ‘The position of any pumping station on the site does not cause any unacceptable impact on the amenities of either existing residential properties to the south of the site or within the new development’

At the end of paragraph 5.22 add:

‘This is an important site within the context of the Plan. It is the largest of the four allocated housing sites. The policy requires that a new access road will be provided into the site from the A281 from the east. This will ensure that construction traffic can gain access to the site without affecting existing residential areas. It will also allow the site to be progressively developed from this access and that its construction within the evolving site will overlap with the delivery of the housing’

At the end of paragraph 5.23 add:

‘The policy also comments on important sewerage issues. The layout of the site should incorporate any pumping stations in a sensitive fashion in order to safeguard and respect the amenities of existing or new residential properties. The use of sustainable urban drainage approach on the site will be particularly supported’

Policy 2.2 Land east of Wantley Hill Estate

- 7.30 This proposed housing allocation is located on the eastern edge of Henfield off the Wantley Hill Estate.
- 7.31 The format and extent of the site has been carefully considered. A sports area and open space provision is proposed along its northern and eastern edge to safeguard

the longer-term relationship between the village and the surrounding countryside. Access is proposed from the southern part of the site.

- 7.32 I recommend modifications so that the policy and its criteria have the clarity required by the NPPF. In particular I recommend that the criterion on the open space/sports area is more prescriptive and that it is directly related to the initial criterion in the policy.

Replace ‘provided the.... principles’ with ‘subject to the following criteria’

**In a replace ‘north’ with ‘north and east’ and ‘allocated’ with ‘safeguarded’
At the end of the criterion add ‘and is designed and provided to an agreed timetable’**

In c replace ‘has regard to’ with ‘takes account of’

In d replace ‘are to’ with ‘should’

In f replace ‘enhances’ with ‘where practicable, enhances’ and ‘Regard will be given’ with ‘Particular attention should be given’

In g replace ‘is’ with ‘should be’

In h replace ‘is’ with ‘should be’

In j replace ‘must’ with ‘should’ and delete ‘irrespective.... Authority’

In l replace ‘has regard to’ with ‘takes account of’

In m replace ‘All lighting is’ with ‘Any external lighting should be’

Policy 2.3 Land west of Backsettown, off Furners Lane

- 7.33 This proposed housing allocation is located on the eastern edge of Henfield off Furners Mead. It is located between Furners Lane to the north and Backsettown to the east.
- 7.34 The format and extent of the site has been carefully considered. A landscape buffer is proposed along its eastern edge to safeguard the longer-term relationship between the village and the surrounding countryside.
- 7.35 The agent acting for the proposed developer has raised two detailed matters on the policy. The first relates to the policy’s requirements for single storey development on the site. The second relates to the access into the site that would be achieved through the demolition of 21 Furners Mead as anticipated by a criterion in the policy.
- 7.36 On the first point the potential developer contends that the height and nature of dwellings on the site is already addressed by the general approach included in the first criterion. Whilst the developer acknowledges that single storey development may be

appropriate to the immediate east of the existing dwellings the representation comments that there is greater flexibility elsewhere on the developable part of the site.

- 7.37 I have considered this matter very carefully in general terms and within the context of the scale and the nature of development to the north (Furners Lane – two storey), south (spur of The Daisycroft – two storey) and the west (Furners Mead – single storey) of the proposed site. On balance, I conclude that the overall effect of the criteria should be more flexible to allow a sensitive balance of house types to come forward. In this context I recommend that criterion a is more prescriptive about the existing single storey dwellings in Furners Mead. I also recommend that criterion c offers support for single storey buildings rather than requiring their provision.
- 7.38 On the second point the potential developer contends that the very specific access requirements have not yet been fully tested. It suggests that access could be provided into the site from Furners Lane to the north. Whilst the representation raises a series of technical issues and potential options it provides no clarity on the how the site might be developed and accessed. In all the circumstances I do not recommend any significant modifications to this part of the policy. Nevertheless, I recommend that the criterion on access is simplified. As submitted, it repeats non-policy information already properly included in the supporting text (paragraph 5.32). I also recommend that the supporting text highlights that other potential access arrangements may be practicable as part of the eventual development of the site.
- 7.39 The representation also suggests that the developable part of the wider site could be extended. The consideration of such a proposition is beyond the remit of my role as the independent examiner of the Plan. It would have a different impact on the neighbourhood area than that envisaged in the policy, it has not been assessed in the SA and it has not been available for public comment.
- 7.40 I recommend modifications so that the policy and its criteria have the clarity required by the NPPF. In particular I recommend that the criterion on the open space/landscape buffer is more prescriptive and that it is directly related to the initial criterion in the policy. Otherwise it meets the basic conditions.

Replace ‘provided the.... principles’ with ‘subject to the following criteria’

At the end of a add: ‘In particular it should respect the single storey nature of the properties in Furners Mead to the immediate west of the development area part of the site’

Thereafter add: ‘The proposal should also provide the landscape buffer and open space to the east of the site’

Replace c with: ‘The proposal should provide dwellings suitable for older and downsizing households in order to meet local housing needs. The provision of single storey dwellings will be particularly supported’

In d replace ‘has regard to’ with ‘takes account of’

In e replace ‘has regard to’ with ‘takes account of’ and ‘(see photograph below)’ with ‘(see the photograph on page 33)’

In f (second sentence) replace ‘are’ with ‘should be’

In g replace ‘is’ with ‘should be’

In h replace ‘is’ with ‘should be’

Replace i with: ‘Vehicular access into the site is provided from Furners Mead and in a way which does not have an unacceptable impact on the amenities of the occupiers of adjacent residential properties’

In j replace ‘must’ with ‘should’ and delete ‘irrespective.... Authority’

In k replace ‘All lighting is’ with ‘Any external lighting should be’

In l replace ‘is designed’ with ‘is safeguarded, designed and provided to an agreed timetable’

Replace o with: ‘The development of the site delivers any reinforcement of the sewerage network which directly arises from the construction of the proposed new homes’

Replace p with ‘The development of the site takes place on the basis of a comprehensive drainage strategy. The strategy should address how seasonal groundwater would be satisfactorily accommodated within the development of the site’

Replace paragraph 5.32 with: ‘Access into the site will be provided by way of a new access road through the existing curtilage of 21 Furners Mead to the west of the site. It is already in the control of the owner of the proposed site. Detailed work is being undertaken on its suitability to accommodate the development proposed. Subject to appropriate technical issues being satisfied the site also has the potential to be served by an alternative and/or additional access from Furners Lane to the north of the site’

Policy 2.4 Land south of the Bowls Club, off Furners Mead

- 7.41 This proposed housing allocation is located on the eastern edge of Henfield off Furners Mead. As the Plan describes the proposed site comprises two paddocks situated between the Bowling Green to the north and the rear of properties off Henfield Common North to the south.
- 7.42 The site sits comfortably with the wider context of the urban fabric of the village. The format and extent of the site has been carefully considered. The policy proposes the development of the site for single-storey development. It also seeks to safeguard the character and appearance of the Henfield Conservation Area.

- 7.43 I recommend modifications so that the policy and its criteria have the clarity required by the NPPF. In particular I recommend that criterion b on the conservation area uses appropriate language from the Town and County Planning Acts on this important matter.
- 7.44 I sought advice from the Parish Council on the purpose of the criterion which requires the dwellings on site to be single storey and to cater for older persons or households wishing to downsize. I was advised that '(the) restriction in height and the number of dwellings proposed on land south of the Bowls Club relates to the rural landscape of the area, particularly the views from Henfield Common, and to mitigate its impact on the listed buildings to the south west of the site. It does also provide the opportunity to provide single storey accommodation suitable for older people over 65 who make up 29.0% of the population of the plan area compared to 19.4% across Horsham District and 16.0% in England. The suitability of a development that caters for the needs of older people is enhanced by its close proximity to the High Street that is accessible by foot'. On the basis of this information I am satisfied that criterion c is both appropriate to the circumstances of the site and evidence-based.

Replace 'provided the.....principles' with 'subject to the following criteria'

In a replace 'must' with 'should'

In b replace 'conserves or enhances' with 'preserve or enhance'

In d replace 'has regard to' with 'takes account of'

In e replace 'has regard to' with 'takes account of'

In g replace 'is' with 'should be'

Replace h with 'Vehicular access into the site is provided from Furners Mead and in a way which does not have an unacceptable impact on the amenities of the occupiers of adjacent residential properties'

In i replace 'must' with 'should' and delete 'irrespective.... Authority'

In j replace 'All lighting is' with 'Any external lighting should be'

Replace l with 'The development of the site takes place on the basis of a comprehensive drainage strategy. The strategy should address how seasonal groundwater would be satisfactorily accommodated within the development of the site'

Policy 3: Employment Development Site Allocations

7.45 This policy is largely the employment equivalent of Policy 1. It identifies three sites for employment development. They feature as three separate policies as follows:

- Policy 3.1.3 Southgrounds, Shoreham Road;
- Policy 3.1.4 Land north of the Old Brickworks; and
- Policy 3.1.5 The Old Kennels site, Project Enterprise.

7.46 Paragraph 5.38 of the Plan explains the context to the allocation of the three sites for employment use. The Henfield Business Park off Henfield Road (A2027) is now at full capacity. On this basis the Plan has allocated three separate and adjoining sites on the opposite (western) side of the Henfield Road. The ambition is to create a cohesive employment area and to contribute towards a sustainable economy in the parish.

7.47 The three sites proposed for employment allocation are largely free-standing sites. They sit within the context of the Henfield Business Park to the east and the Old Brickworks employment site to the south. On this basis I am satisfied that they would be appropriately located in the neighbourhood area. In addition, they would help to fulfil the Parish Council's ambitions to achieve a cohesive and functional employment hub in the parish.

7.48 I sought advice from the Parish Council about the extent to which it had sought to achieve the comprehensive development of the three sites (incorporating a single access) rather than their separate development as envisaged by the separate policies. It advised that:

'The three sites were put forward separately by three different land owners; and are likely to be developed at different times. An alternative approach could be to allocate as one site but with the flexibility that it could be developed in phases. This could include varying criterion e to say that a single point of access would be preferable but that separate access points would be considered if necessary, for deliverability reasons. It should be noted that a planning application has been submitted for the part of the site covered by Policy 3.1.5 under reference DC/20/0049. At the time of writing, discussions are ongoing between district council officers and the applicant over points of clarification before the application is formally re-validated'

7.49 The Parish Council also invited me to recommend a modification to the definition of employment use in the policies so that it included B1 (Business) and B8 (Storage and Distribution) uses only and not B2 (General Industrial) uses. This request related to the proximity of a limited number of residential properties in the immediate area.

7.50 I looked at the three sites carefully when I visited the neighbourhood area. I saw the way in which they related to other employment uses in the immediate locality and to the Henfield Road. Taking account of all the information available to me I am satisfied that their separate development would be appropriate to their characteristics and different ownerships and that such an approach would meet the basic conditions. However, I recommend modifications to the supporting text in paragraph 5.40 to

identify the potential for, and the desirability of, their joint and comprehensive development. Given that there will be a range of land ownership and viability issues involved in their separate and potential joint development I have not recommended a modification to the various policies that would require their comprehensive development. Such an approach would be beyond the remit of my role (and as identified in paragraph 1.4 of this report)

7.51 Each policy is associated with an identical set of criteria. For simplicity I comment on them jointly. In general terms I am satisfied that the criteria are appropriate and distinctive to the location of the three sites within the parish. In particular they recognise their location in a countryside setting and one which will require sensitive landscaping on their western boundaries. Sweeptech Environmental Services Limited offers its support to the proposed allocations. It also suggests that the Plan is modified in order the inclusion of land to the west of site F and G and the Old Brickworks to facilitate limited additional employment land west of site F and an access road west of site F, G and the Old Brickworks. The extension of the proposed employment sites is beyond my remit as the independent examiner of the Plan. In particular its appropriateness has not been tested through the plan-making process and the associated consultation processes.

7.52 I recommend the following modification to the criteria in each of the three policies:

- Criterion b – to ensure that the reference to character relate to this specific part of the neighbourhood area;
- Criterion c – to ensure appropriate boundary treatment in addition to landscaping;
- Criterion d –detailed modifications to the wording used; and
- Criterion h - detailed modifications to the wording used

7.53 I have considered carefully the Parish Council’s suggestion that the employment uses on the three sites should be restricted to Class B1 and B8 uses. Given their location within the parish, the location of other business uses in the locality and criterion f which requires that any proposals have regard to the amenities of nearby residential properties I am not satisfied that such a restrictive approach is required. In any event HDC will be able to consider individual proposals on their merits and, where necessary, impose conditions on the operation of any such uses. This approach would have regard to paragraph 81d of the NPPF which comments that planning policies should be flexible enough to accommodate needs not anticipated in any Plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

At the end of paragraph 5.40 add: ‘The Plan would support the comprehensive development of the three sites. This could bring business efficiencies, reduce development costs and assist in providing comprehensive boundary and landscape treatments. In this scenario the criteria that apply to each of the three sites would also apply to the comprehensive development of the three sites’

Policy 3.1.3 Southgrounds, Shoreham Road

- 7.54 The appropriateness of this proposed allocation has already been addressed in paragraph 7.50 of this report.
- 7.55 I recommend a series of modifications of the criteria associated with the policy for the reasons identified in paragraph 7.52 of this report.

In b replace ‘the character of Henfield’ with ‘the character of this part of the neighbourhood area’

In c replace ‘for landscaping’ with ‘for appropriate boundary treatments incorporating landscaping’

In d replace ‘as much as possible’ with ‘as much as is practicable of’

In h replace ‘All’ with ‘Any external’

Policy 3.1.4 Land north of the Old Brickworks

- 7.56 The appropriateness of this proposed allocation has already been addressed in paragraph 7.50 of this report.
- 7.57 I recommend a series of modifications of the criteria associated with the policy for the reasons identified in paragraph 7.52 of this report.

In b replace ‘the character of Henfield’ with ‘the character of this part of the neighbourhood area’

In c replace ‘for landscaping’ with ‘for appropriate boundary treatments incorporating landscaping’

In d replace ‘as much as possible’ with ‘as much as is practicable of’

In h replace ‘All’ with ‘Any external’

Policy 3.1.5 The Old Kennels site, Project Enterprise

- 7.58 The appropriateness of this proposed allocation has already been addressed in paragraph 7.50 of this report. The proposed allocation of the site has generated community support.
- 7.59 I recommend a series of modifications of the criteria associated with the policy for the reasons identified in paragraph 7.52 of this report.

In b replace ‘the character of Henfield’ with ‘the character of this part of the neighbourhood area’

In c replace ‘for landscaping’ with ‘for appropriate boundary treatments incorporating landscaping’

In d replace ‘as much as possible’ with ‘as much as is practicable of’

In h replace ‘All’ with ‘Any external’

Policy 3.2: Development of New and Existing Employment Uses

- 7.60 This policy has a focus on the employment base of the neighbourhood area. It has two related parts. The first offers support to new employment uses or for the intensification of existing uses subject to a series of criteria. The second identifies the limited circumstances where proposals which would involve a loss of existing employment uses would be supported.
- 7.61 The first part of the policy takes an appropriate and positive approach to this important matter. I recommend two modifications to ensure that the policy has the necessary clarity. The first relates to the second criterion which requires that any such proposals demonstrate that they will lead to a likely increase in the number and quality of local employment opportunities. As submitted this element of the policy adds little if any value to the wider policy given that its focus is on proposals for new employment uses or for proposals to extend existing uses. Whilst the latter category may not necessarily involve additional employment level at the business concerned, they may reflect other business opportunities or an opportunity to consolidate or diversify existing business activity. In these circumstances I recommend the deletion of the criterion
- 7.62 The second relates to criterion d on car parking. As submitted, it refers to Policy 4 of the submitted Plan. Whilst this is not an unreasonable approach that policy also provides its own level of detail. As such I recommend that the criterion is modified so that it takes on a more general approach.
- 7.63 The second part of the policy also meets the basic conditions in general terms. In particular it takes account of commercial viability. Nevertheless, I recommend that the type of proposals to which the policy refers are made clear and that the wording used in the policy is more balanced.

In P3.2.1 delete b.

In P.3.2.1 d replace ‘can meet.....HNP’ with ‘meets the relevant development plan car parking standards’

**In P3.2.2 replace the opening part of the policy with:
‘Proposals for the change of use or redevelopment of existing employment sites to non-employment uses will not be supported unless:’**

Policy 3.3: Henfield Village Retail Centre

- 7.64 This policy addresses the retail centre of Henfield. It is based on High Street. Policy Map 3 helpfully shows the identified Village Retail Centre as defined in the HDPF. In particular it shows the primary shopping frontage.
- 7.65 The policy has two related parts. The first comments that the retail centre will be retained for a variety of retail and commercial facilities usually associated with a village centre and as identified in paragraph 5.48 of the Plan (Policy 3.3.2). The second offers support to proposals for new development and for alterations to existing buildings where they have regard to the Conservation Area Management Plan.
- 7.66 I sought the Parish Council's comments about the implications of the first part of the policy in general, and the extent that any change of use (insofar as planning permission is required) between the various identified Use Classes in particular would be supported. I was advised that the Plan does not prevent such changes of use, but Policy 13 of the Horsham District Planning Framework comments that in 'primary frontages' such as Henfield, no greater than 30% of a designated frontage length should be taken up by non-retail use. In this context the Parish Council considered that there was no need to duplicate this policy.
- 7.67 The plan has correctly identified that there is no need for it to duplicate an existing development plan policy. Nevertheless, I recommend that the supporting text is modified so that it draws attention to the comprehensive nature of Policy 13 of the HDPF and its specific implications on Henfield. I also correct an error in the policy itself.
- 7.68 The second part of the policy takes a positive and supporting approach towards new investment and commercial development. However, for clarity I recommend a modification so that it more specifically relates to the range of uses identified in the first part of the policy. Otherwise its implementation could have unintended consequences. This approach would also achieve a better relationship with Policy 13 of the HDPF.

In Policy 3.3.1 replace 'as' with 'is'

In Policy 3.3.2 replace 'Proposals for new development' with 'Proposals for new development of the types identified in Policy 3.3.1' and 'adhere to the recent' with 'take account of the Henfield'

At the end of paragraph 5.48 add: 'Policy 3.3 seeks to support the continued vitality and viability of the village retail facility. The approach recognises the role of the village centre to the economic and social well-being of the Parish. The policy adds value to the approach included in Policy 13 of the Horsham District Planning Framework. In particular that policy sets out detailed guidance for changes of use from existing retail units (Class A1) to other uses'

Policy 4: Transport, Access and Car Parking

- 7.69 This policy addresses an overlapping range of transport-related issues. In summary the policy comments about the following issues:

- development providing pedestrian and cycle access to community facilities (Policy 4.1);
- the standards for roads, cycle ways and footpaths (Policy 4.2);
- the retention of car parking facilities (Policy 4.3); and
- the provision of off-road car parking (Policy 4.4).

7.70 In general terms I am satisfied that the policy meets the basic conditions. In particular paragraphs 5.52 and 5.53 make a compelling case for the retention of the limited range of public car parking facilities in Henfield. I am also satisfied that the criteria in Policy 4.1 are neither inflexible nor prescriptive.

7.71 I recommend that the opening part of Policy 4.1 is modified. As submitted, it has a rather clumsy effect. I also recommend that it includes a recognition that the policy will apply in different ways to different development proposals based on their scale, nature and location in the Parish.

7.72 The other three elements of the policy generally meet the basic conditions. In each case I recommend modifications so that they use appropriate policy wording, and to achieve consistency with the approach in other policies in particular. In policy 4.2 I recommend the deletion of the unnecessary element of the policy which refers to non-adopted roads.

In Policy 4.1 replace the initial element with: ‘As appropriate to their scale, nature and location development proposals should’

In criteria a/b/c delete the initial ‘They’

In Policy 4.2 replace ‘must’ with ‘should’ and delete ‘irrespective.... Authority’

In Policy 4.3 replace ‘be resisted’ with ‘not be supported’

In Policy 4.4 replace ‘must’ with ‘should’

Policy 5: Utility Infrastructure

7.73 This policy addresses utility infrastructure. Its principal focus is on supporting the improvement or the expansion of existing infrastructure. It also requires that new infrastructure should be delivered alongside the associated residential or commercial development that depends on that infrastructure.

7.74 I am satisfied that the first part of the policy is appropriate to the circumstances addressed in the Plan and the scale of development which it proposes. Nevertheless, I recommend a modification which acknowledges that not all such works would require planning permission given the extensive permitted development rights enjoyed by statutory undertakers.

- 7.75 The second part of the policy comments about the need for infrastructure to be ‘delivered alongside the development that depends on that infrastructure’. The supporting text at paragraph 5.62 comments that adequate infrastructure should be in place prior to any development. Plainly the provision of appropriate infrastructure is essential to ensure that development is both sustainable and capable of being sensitively accommodated within the wider community. National legislation has been updated and refined in recent years to reflect this important matter.
- 7.76 However as submitted the second part of the policy offers no specific guidance to a developer about the scale of infrastructure required and/or its phasing. In addition, there is an inconsistency between the policy and the supporting text. The proposed policy highlights the difficulty of attempting to craft a general policy on this issue. Each development site will present its own issues. In addition, HDC will take a separate approach to each site on a case-by-case basis and the scale and nature of the site concerned. I recommend modifications to both the policy and the supporting text to remedy these issues. These modifications also reflect national policy that infrastructure requirements and wider developer contributions should relate directly to the relationship between new development and infrastructure provision and the scale and nature of the development proposed.
- 7.77 I recommend a detailed modification to the third part of the policy. Otherwise it meets the basic conditions.

At the beginning of Policy 5.1 add: Insofar as planning permission is required’

In Policy 5.2 replace ‘The infrastructure...alongside’ with ‘Development proposals should be associated with the delivery of any necessary infrastructure and of a kind that directly relates to the scale and nature of the proposal. The infrastructure required should be delivered to an agreed timetable in association with the development concerned’

In Policy 5.3 replace ‘will be supported provided they’ with ‘should’

Replace paragraph 5.62 with: ‘Policy 5 comments about the development of utility infrastructure. The Plan recognises that the provision of appropriate infrastructure is essential to ensure that any development is both sustainable and capable of being sensitively accommodated within the wider community. National legislation has been updated and refined in recent years to reflect this important matter. The second part of the policy seeks to ensure that there is an appropriate relationship between new development and the delivery of essential infrastructure. This will be addressed on a case-by-case basis by Horsham District Council in its capacity as the local planning authority’

Policy 6: Medical Infrastructure

- 7.78 This policy addresses medical infrastructure. Its principal focus is on expansion of medical infrastructure. It also sets out to resist development that would result in the loss of premises currently used for such purposes.
- 7.79 I am satisfied that the first part of the policy meets the basic conditions.
- 7.80 The second part of the policy resists the loss of sites and premises currently or last used for the provision of medical facilities subject to the provisions of the HDPF. This approach does not have the clarity required by the NPPF in two respects. The first is that the format of the policy requires the reader to revert to another document to understand its intentions (in this case the exceptional circumstances where such developments might be supported).
- 7.81 The second is that the policy takes no account of the viability of the facilities concerned. Viability now features in the equivalent policy in the emerging Local Plan. I have included this aspect within the modified policy to ensure that it also does likewise. In order to remedy these issues, I recommend that the policy is modified so that it makes reference to the circumstances highlighted in Policy 43 of the adopted HDPF. The element of the submitted policy which addresses alternative provision of medical facilities is incorporated in the recommended modifications to this part of the policy.

In Policy 6.2 replace ‘will be resisted subject to the provisions in the HDPF’ with ‘will not be supported unless:

- **an alternative facility of equivalent or better quality and scale to meet medical needs is available, or will be provided at an equally accessible location within the vicinity; or**
- **evidence is provided that demonstrates the continued use of the site as a medical facility or service is no longer feasible or viable, taking into account factors such as appropriate active marketing and the demand for the use’**

Policy 7: Education Infrastructure

- 7.82 This policy addresses educational infrastructure. Its principal focus is that proposals for housing development should have regard to the availability of school places in the local catchment area. It also sets out to resist development that would result in the loss of premises currently used for such purposes.
- 7.83 The first part of the policy is not worded in a policy format – it simply requires proposals for housing development to have regard to the availability of school places in the local catchment area. Plainly the need or otherwise for developers to contribute towards the expansion and/or adaptation of schools will be considered on a case-by-case basis by both HDC and West Sussex County Council (in its capacity as the education authority). I recommend that the policy is modified so that it makes a direct connection between new development and the provision of educational facilities in the catchment area.

7.84 The second part of the policy resists the loss of sites and premises currently or last used for the provision of educational facilities subject to the provisions of the HDPF. This approach does not have the clarity required by the NPPF in two respects. The first is that the format of the policy requires the reader to revert to another document to understand its intentions (in this case the exceptional circumstances where such developments might be supported). The second is that the policy takes no account of the viability of the facilities. This matter now features in the equivalent policy in the emerging local plan. I have included this aspect within the modified policy to ensure that it also does likewise. In order to remedy these issues, I recommend that the policy is modified so that it makes reference to the circumstances highlighted in Policy 43 of the adopted HDPF. The element of the submitted policy which addresses alternative provision of educational facilities is incorporated in the recommended modifications to this part of the policy.

In Policy 7.2 replace ‘will be resisted subject to the provisions in the HDPF’ with ‘will not be supported unless:

- **an alternative facility of equivalent or better quality and scale to meet educational needs is available, or will be provided at an equally accessible location within the vicinity; or**
- **evidence is provided that demonstrates the continued use of the site as an educational facility or service is no longer feasible or viable, taking into account factors such as appropriate active marketing and the demand for the use’**

Policy 8: Broadband Infrastructure

7.85 This policy addresses broadband infrastructure. Its principal focus is on supporting the development of proposals which would provide access to a high-quality broadband network in the parish. Paragraph 5.68 acknowledges that many elements of broadband and telecommunications installations are permitted development.

7.86 The policy takes an appropriate approach to this matter. It has regard to national policy (Section 10 of the NPPF). In addition, it includes appropriate environmental safeguards. As such it meets the basic conditions.

Policy 9: Community Infrastructure

7.87 This policy addresses community infrastructure. It addresses an interconnected range of community issues in the neighbourhood area as follows:

- supporting the improvement of the Henfield Hall, the Henfield Haven or other community buildings (Policy 9.1);
- resisting the loss of the community functions of such buildings (Policy 9.2);
- supporting proposals for the extension or improvement of sports, leisure and recreational facilities (Policy 9.3);
- resisting the loss of sports, leisure and recreational facilities (Policy 9.4);

- supporting proposals which would protect and enhance the Downs Link and the existing network of footpaths and bridleways (Policy 9.5); and
- supporting proposals for the establishment of new allotments (Policy 9.6).

- 7.88 The approach incorporated in the policy is underpinned by the evidence and work undertaken by the Community Facilities and Infrastructure Focus Group.
- 7.89 In general terms I am satisfied that the first two parts of the policy on community facilities meet the basic conditions. They highlight the importance of such facilities to health and well-being as included in Section 8 of the NPPF. I sought advice from the Parish Council on the 'other community buildings or facilities' to be addressed by these two elements of the policy beyond the specific mention of Henfield Hall and the Henfield Haven. As submitted the Plan is unclear on this point. The Parish Council commented that Annex 3 Community Facilities and Infrastructure Focus Group Report provides details of the current community facilities in the village, some of which have been prioritised for inclusion in the attached Henfield Infrastructure Delivery Plan (Annex 4). The Delivery Plan is a living document and may change over time. I recommend a modification to the elements of the policy accordingly in order to bring the clarity required by the NPPF.
- 7.90 The fourth element of the policy would not support proposals which would result in the loss of existing recreational facilities 'subject to the provisions in the HDPF'. This approach does not have the clarity required by the NPPF in two respects. The first is that the format of the policy requires the reader to revert to another document to understand its intentions (in this case the exceptional circumstances where such developments might be supported). The second is that the policy takes no account of the viability of the facilities concerned. This matter now features in the equivalent policy in the emerging local plan. I have included this aspect within the modified policy to ensure that it also does likewise. In order to remedy these issues, I recommend that the policy is modified so that it makes reference to the circumstances highlighted in Policy 43 of the adopted HDPF.
- 7.91 The fifth part of the policy takes a positive approach to developments that would protect and enhance the Downs Link and other footpaths and bridleways. It meets the basic conditions.
- 7.92 The sixth part of the policy provides an appropriate and supporting approach towards the establishment of new allotments or community gardens. I am satisfied that it meets the basic conditions with a detailed modification which clarifies the local amenity issue in the final criterion.

In Policy 9.1 replace 'community building' with 'community buildings listed in Annex 3 of the Plan'

In policy 9.2 replace 'other community building or facility' with 'any other community building or facility listed in Annex 3 of the Plan'

In Policy 9.4 replace 'subject to the provisions in the HDPF' with 'unless:

- **an alternative facility of equivalent or better quality and scale to meet community needs is available, or will be provided at an equally accessible location within the vicinity; or**
- **evidence is provided that demonstrates the continued use of the site as a recreational facility or service is no longer feasible or viable, taking into account factors such as appropriate active marketing and the demand for the use.**

In Policy 9.6 d insert ‘unacceptable’ between ‘no’ and ‘loss’

Examiner Note: Recommended modifications to Policy 11.4 would reposition that policy to the end of Policy 9. This issue is addressed in paragraph 7.106 of this report.

Policy 10: Green Infrastructure and Biodiversity

- 7.93 This is a comprehensive and locally-distinctive policy. As paragraph 5.78 comments its ambition is to protect and enhance the green infrastructure assets of the Parish, and to assist in increasing its biodiversity. It has four related parts as follows:
- the maintenance and enhancement of historic commons, ancient woodlands, ponds and copses (Policy 10.1);
 - the maintenance or increase of biodiversity and with particular reference to four identified biodiversity features (Policy 10.2);
 - detailed comments on the layout and landscape arrangements of development proposals (Policy 10.3); and
 - the requirement for the submission of a green infrastructure plan for larger developments (Policy 10.4).
- 7.94 The first part of the policy is partly a statement of fact and partly policy. I recommend modifications to remedy this matter. I also recommend that the ‘enhance’ element of the policy is qualified so that it would apply where it was practicable for the developer to do so. In some cases, development proposals will be able to protect and maintain the identified green infrastructure assets. In other cases, those assets may also be capable of enhancement.
- 7.95 The second part of the policy takes a sensitive and balanced approach to the relationship between the design of new development and biodiversity. It meets the basic conditions.
- 7.96 The third part of the policy takes a sensitive and balanced approach to the relationship between the layout and landscaping of new development and biodiversity. I recommend that its fourth criterion on views is directly linked to the identified views in paragraph 5.81 of the Plan. Otherwise it meets the basic conditions.
- 7.97 The fourth part of the policy is well-intentioned. Nevertheless, it is more a process requirement rather than a policy. As submitted this part of the policy offers no guidance on how development proposals would be determined beyond that already included in Policies 10.2 and 10.3. In these circumstances I recommend that it is deleted.

However, given the way in which it provides appropriate advice to developers I recommend that it is repositioned into the supporting text in a slightly modified format which adds value to the policy-approach in Policies 10.2 and 10.3.

Replace Policy 10.1 with: ‘Development proposals that would directly affect historic commons, ancient woodlands ponds and copses or which would indirectly affect such features should ensure that they are protected, maintained and where practicable enhanced’

In Policy 10.3 d replace ‘views’ with ‘the views identified in paragraph 5.81 of this Plan’

Delete Policy 10.4

At the end of paragraph 5.80 add: ‘Policies 10.2 and 10.3 provide a context within which developers should submit planning applications which may affect existing biodiversity in the Parish. [Insert at this point the deleted policy 10.4 as supporting text]’

Policy 11: Local Green Spaces

- 7.98 This policy proposes the designation of a series of local green spaces (LGSs). The LGS Evidence Base comments about the relationship between each of the proposed LGSs and the criteria for such designations in paragraph 100 of the NPPF. It does so to good effect. For clarity the relevant information is transposed into the Plan itself. The various LGSs are shown on Policy Map 5. Descriptions of the sixteen proposed LGSs themselves with detailed location maps are included in the Plan.
- 7.99 The policy also comments about other small parcels of green space (Policy 11.3) and offers to support proposals for recreational or tourism use of the River Adur subject to environment criteria (Policy 11.4).
- 7.100 In general terms I am satisfied that the various LGSs meet the three criteria in the NPPF. In particular they are local in character and are in close proximity to the communities that they serve. Proposed LGSs 1-3 are registered common land. I sought advice from the Parish Council about the extent to which LGS designation was necessary in such circumstances. The Parish Council accepted that registered common land is already protected/safeguarded by separate legislation, and their allocation as Local Green Space is a ‘belt and braces’ approach. In these circumstances I recommend that these three proposed LGSs are deleted from the policy. This approach accords with section 37-011-20140306 of Planning Practice Guidance on this matter which comments that ‘if land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space’. Plainly the deletion of the three spaces from the schedule of LGSs does not affect their status as registered common land.

- 7.101 HDC raises concerns about the proposed designation as LGS of the open space around Fillery Way (LGS15). I looked at this proposed LGS carefully when I visited the neighbourhood area. I saw that it was largely incidental open space to the east of the residential development off Fillery Way. The analysis in the Plan identifies the proposed LGS as 'greens, open spaces and buffer zones'. This is indeed the case. However, I am not satisfied that the proposed designation is 'demonstrably special to the local community' as required by the NPPF. By definition LGSs are intended to be more than incidental open spaces within and around residential development. In these circumstances I recommend the deletion of the proposed LGS15 from the policy.
- 7.102 In addition, I am satisfied that the proposed designations accord with the more general elements of paragraph 99 of the NPPF. Firstly, I am satisfied that they are consistent with the local planning of sustainable development. Their designation does not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGSs are capable of enduring beyond the end of the Plan period. Indeed, they are an established element of the local environment and have existed in their current format for many years. In addition, no evidence was brought forward during the examination that would suggest that the local green spaces would not endure until 2031.
- 7.103 Policy 11.2 largely takes the matter of fact of approach anticipated by the NPPF. However, it comments that development proposals will be resisted unless they are ancillary to the use of land for public recreational purpose or are required for a statutory utility infrastructure purpose. Whilst this approach is helpful it attempts to define the very special circumstances in which development might be supported. However, in my judgement these are matters best determined by HDC on a case-by-case basis taking account of all the material considerations included in a planning application. In this context I recommend that the second part of the policy is replaced with a more general approach which has regard to policy advice in the NPPF. I also recommend consequential modifications to paragraph 5.86 of the Plan. This will ensure that the Parish Council's intentions are retained in the supporting text.
- 7.104 Policy 11.3 comments about other small parcels of green space within the villages (such as wide verges and landscaped areas). It comments that they should be incorporated into the design of new development. In the clarification note I sought advice from the Parish Council on its intentions for this policy given that the small parcels of green space are not identified in the Plan. The Parish Council advised that this part of the policy was intended as a 'catch-all' of unmapped areas of green space, and that it was content for this policy to be deleted. I recommend accordingly.
- 7.105 The final part of the policy offers support for proposals for recreational or tourism use of the River Adur subject to environmental criteria. I recommend modifications to its wording so that it has the clarity required by the NPPF. Otherwise it meets the basic conditions.
- 7.106 This final part of the policy sits oddly within the context of a policy which otherwise concentrates on the designation of LGSs. This issue is highlighted as the designation

of LGSs is a very specific matter included within the NPPF. In these circumstances I recommend that the final part of the policy (as modified) is repositioned to sit within the wider context of Policy 9 of the Plan which addresses community infrastructure, including recreational facilities.

In Policy 11.1 delete LGS 1/2/3/15.

Replace Policy P11.2 with:

‘Proposals for development within the designated Local Green Spaces will only be supported in very special circumstances’

Delete Policy 11.3

In Policy 11.4 replace ‘Development proposals...River Adur’ with ‘Development proposals for recreational or tourism use of the River Adur and its immediate environs will be supported’ and ‘conserved and enhanced’ with ‘conserved and where practicable enhanced’

Reposition the modified Policy 11.4 to become Policy 9.7 within the broader context of Policy 9 of the Plan.

Delete LGS 1/2/3/15 from Policy Map 5.

Delete LGS 1/2/3/15 from the table of LGSs on pages 56/57 of the Plan.

Replace the final sentence in paragraph 5.86 to read: ‘Policy P11.2 sets out the matter of fact approach to designated local green spaces in the NPPF. Proposals for development affecting any designated local green spaces will be determined by HDC on a case-by-case basis taking account of all the material considerations included in a planning application. However, proposals which would be ancillary to the recreational use of the land concerned and/or for small scale utilities development may be supported’

Policy 12: Design Standards for Development

7.107 This policy sets out design standards for new development. It provides a connection to the submitted Parish Design Statement (Appendix C of the Plan).

7.108 The Design Statement is a very good local response to this important matter. The policy requires that the development concerned meets the requirements of the Design Guide and includes four particular criteria as follows:

- the proposal respects the amenities of adjacent residential properties;
- the proposal achieves satisfactory access;
- the scale, density, massing, height, landscape design layout and materials are high quality and reflect the scale of surrounding buildings; and
- the design takes account of the Henfield Conservation Area and/or listed buildings.

7.109 In general terms the policy takes an appropriate approach. However, its structure is complicated to the extent that it requires compliance with the wider Design Statement and four specific criteria. On the one hand I am satisfied that it is appropriate for the policy to incorporate more general amenity and access issues which are less specific than the more detailed design elements of the policy. This reflects the structure of the Plan itself which does not directly include a policy on these issues. On the other hand, whilst the second part of the policy comments about the relationship between the development concerned and the four specific criteria this approach does not extend to the Design Statement. I recommend modifications to remedy this matter.

Replace the opening part of the policy with:

‘As appropriate to their scale, nature and location development proposals will be supported where their design and detailing meet the relevant requirements in the Henfield Parish Design Statement (Appendix C of the Plan).

In addition, as appropriate to the site concerned, development proposals should comply with the following criteria:’

Community Aims

7.110 The Plan includes a series of community aims. The incorporation of community aims in the Plan reflects government advice that it is appropriate for a neighbourhood plan to include non-land use issues which have arisen naturally during the plan-making process. Paragraph 5.1 of the Plan comments about the way in which they reflect the aspirations of the local community. The Aims are included within the main body of the Plan rather than in a separate section. However, given the context set by paragraph 5.1, the way in which the Aims supplement land use policies and the different colouring used I am satisfied that the approach is acceptable.

7.111 The Aims are as follows:

- CA1 Phasing of residential development
- CA2 Banking facilities
- CA3 Tourism
- CA4 Sustainable Transport
- CA5 Establishment of a pharmacy at the Health Centre
- CA6 The Quality of New Development

7.112 I am satisfied that Aims 2-6 are both appropriate and distinctive to the neighbourhood area. Aim 1 loosely comments that residential development will be phased throughout the Plan period. However, the Aim is neither explained nor defined in the supporting text. As such it has little if any effect. The development and phasing of the four allocated sites will take place subject to a series of specific viability and other matters. In addition, the larger of the four sites will take longer to deliver once its development has started.

7.113 I have considered whether there are any modifications which I could recommend to the Aim to provide clarity. I am not convinced that there are circumstances that would

allow me to do so. In particular in the first instance I am uncertain about the phasing ambitions included within the policy. In the second instance it would be impractical to impose phasing restrictions on any of the four allocated sites or to identify the order in which the sites are developed. In all the circumstances I recommend that the Aim is deleted.

Delete Community Aim 1 - Phasing of Residential Development

Other matters

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

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

- 7.115 There are several sections in the introductory sections of the Plan which have now been overtaken by events. This is a normal part of the preparation of a neighbourhood plan. In this case it is highlighted given that the plan-making process has taken longer than anticipated and the South Downs Local Plan has now been adopted. I recommend a series of modifications to the Plan so that it is both up-to-date and forward-looking.

In paragraph 3.2 replace '2018' with '2019'

In paragraph 3.4 replace 'of the HDPF' with 'of both the HDPF and the South Downs Local Plan'

At the end of paragraph 3.5 add: 'The south-eastern part of the neighbourhood area is located within the South Downs National Park. As such future development in this area is controlled by the adopted South Downs Local Plan. The Plan was adopted in July 2019. It is primarily a landscape-led Plan. Strategic Policies SD4,5 and 6 address Landscape Character, Design and Views respectively'

In paragraph 3.10 delete the final sentence

Thereafter add a new paragraph to read:

'3.11

Horsham District Council is now preparing a new Local Plan. Once adopted it will replace the HDPF. The Parish Council and the District Council have agreed arrangements to ensure that the emerging local plan and the submitted neighbourhood plan are complementary in the effects. These arrangements are set out in paragraphs 6.6 and 6.7 of this Plan'

Monitoring and Review of the Plan

- 7.116 Paragraphs 4.5 and 4.6 of the Plan correctly comment about the need to monitor any 'made' Plan and a potential future review of the neighbourhood plan. In particular they draw attention to the emerging Horsham Local Plan which, once adopted, will replace the existing Development Framework. I have drawn separate reference to the emerging Local Plan earlier in this report.
- 7.117 HDC has supplied me with the information that it sent to town and parish councils in 2019 on the relationship between the emerging Local Plan and neighbourhood plans. The information highlights that neighbourhood plans are at different stages of production and will be affected by the Local Plan process in different ways. It included a series of options which parish councils engaged in neighbourhood planning could consider and select according to their circumstances and the stage which its plan had reached.
- 7.118 I sought clarification from the Parish Council on the way in which intended to monitor and review a 'made' neighbourhood plan and which of the HDC options it had selected. I was advised that it had selected the hybrid option. This would involve HDC meeting housing needs in any neighbourhood area through the local plan process (as set out in one of the other options). On adoption of the new Local Plan, the neighbourhood plan could still be reviewed to update on any policy issues considered to be relevant to the parish such as design or local greenspaces. The parish could also choose to allocate additional housing sites in addition to those identified in the Local Plan if it wishes to do so.
- 7.119 In this context the Parish Council advised that it had decided to proceed with the current neighbourhood plan and for it to be submitted and examined against the adopted Horsham District Planning Framework. Any subsequent uplift in housing numbers in the neighbourhood area would then be determined through the emerging Local Plan. This could include the Local Plan allocating additional sites if that was considered necessary and sustainable. In this scenario once the emerging Local Plan was adopted the Parish Council would review any 'made' neighbourhood plan to see if any of its policies need to be updated.
- 7.120 In these circumstances I recommend that the paragraphs on the review of the Plan are modified so that they are more explicit about the arrangements agreed between HDC and the Parish Council. I also recommend that this part of the Plan is more clearly identified. As submitted, it occupies a small part of Section 4 which comments on Vision, Objectives and Land Use Policies. I also recommend that the timetable for any necessary review of a made neighbourhood plan is made more explicit. This will bring clarity for all concerned in the development process in the parish. Plainly once the Local Plan has been adopted the scale and nature of any required review of the general elements of the neighbourhood plan will ultimately be one for local debate and decision.

Delete paragraphs 4.5 and 4.6

Add a new paragraph at the end of Section 1 to read:

'1.12

In the event that the Plan is made it will need to be monitored and, where necessary, reviewed. The details of how the Parish Council will undertake these tasks, and their relationship with the emerging Horsham Local Plan are addressed in paragraphs 6.6 and 6.7 of this Plan'

Add a new section at the end of Section 6 to read:

'Monitoring and Review

6.6

The Plan has been prepared in changing circumstances. The adopted development plan is the Horsham District Planning Framework and the South Downs Local Plan. However, the neighbourhood plan has been prepared at a similar time as the initial phases of work have been undertaken on the Horsham Local Plan. Once adopted the Local Plan will replace the Planning Framework. The Parish Council has decided to proceed with current neighbourhood plan and for it to be submitted and examined against the currently adopted Horsham District Planning Framework.

6.7

Any subsequent uplift in housing numbers in the neighbourhood area would then be determined through the emerging Local Plan. This could include the Local Plan allocating additional sites if that was considered necessary and sustainable. Once the emerging Local Plan has been adopted the Parish Council will consider the need for any policies in the neighbourhood plan to be updated. Any review that is necessary will begin within twelve months of the adoption of the Local Plan'

8 Summary and Conclusions

Summary

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

Conclusion

- 8.3 On the basis of the findings in this report I recommend to Horsham District Council and the South Downs National Park Authority that, subject to the incorporation of the modifications set out in this report, the Henfield Neighbourhood Development Plan should proceed to referendum.

Referendum Area

- 8.4 I am required to consider whether the referendum area should be extended beyond the Plan area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as originally approved by Horsham District Council and the South Downs National Park Authority.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in an efficient manner.

Andrew Ashcroft
Independent Examiner
11 May 2020