

## Slaugham Neighbourhood Plan Working Group response to MSDC comments on draft Submission Documents: September 2018

Para/Policy No.	MSDC Comment	Action ( <del>strikethrough text is deleted</del> / <u>underlined text is additional</u> )
1.7 - 1.10  page 2	Given the District Plan is now adopted, MSDC advised it is not necessary to set out the previously proposed modifications. Recommend paragraphs 1.7 -1.10 set out the adoption of the District Plan only.	<p>Para 1.7 - 1.10 updated to read:</p> <p>1.7 Neighbourhood Plans must be in general conformity with the adopted Development Plan Document (DPD) of the District which at this time is the Mid Sussex District Plan 2014-2031. This was adopted by MSDC, at its meeting on the 28 March 2018.</p> <p><del>1.8 Mid Sussex District Council submitted the District Plan to Government in August 2016. The examination of the District Plan commenced in November 2016 with a final hearing session held in February 2018.</del></p> <p><del>1.9 The Inspector published his Report on the 12 March 2018. The Report concluded that the MSDP provides an appropriate basis for the planning of the District, provided that a number of main modifications were made. The Main Modifications proposed were agreed by MSDC and included:</del></p> <ul style="list-style-type: none"> <li><del>• Modifications to the housing requirement to include a revised OAN and an allowance for unmet need in the housing market area;</del></li> <li><del>• The establishment of a stepped housing trajectory relating to the timing of unmet need in the housing market area, the need to identify further housing allocations, and the need to avoid further harm to the Ashdown Forest SAC;</del></li> <li><del>• The introduction of Policy DP5A: Planning to Meet Future Housing Need, containing a commitment to work proactively with other authorities to address the need for housing across the housing market areas, with a commitment to a plan review for submission in 2023;</del></li> </ul>

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		<ul style="list-style-type: none"> <li>• Modifications to the spatial strategy in Policy DP6 and the related text to provide a better structure for the distribution of housing;</li> <li>• The introduction of DP9B: Strategic allocation to the north of Clayton Mills, Hassocks</li> </ul>
<b>2.20</b> <b>page 6</b>	Recommend para is updated to reflect the completions and commitments information published in April 2018	Para 2.20 updated to reflect the latest completions and commitments information as at April 2018.
<b>2.22</b> <b>page 6</b>	Recommend para is updated to reflect the recent planning permission at Wyevale Garden Centre.	<p>Para 2.22 updated to read:</p> <p>There are a number of businesses distributed throughout the Parish, including at each of the 4 villages. In addition retail business are located and <u>a recent permission at Handcross Garden Centre has approved the demolition of the garden centre building to and construction of industrial units for B1(business) and B8 (storage) use adjacent to the A23 at Wyevale Garden Centre and 4 Front Car Sales.</u> Footnote to include planning application reference (DM/16/4657).</p>

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<b>Policy 1: Protecting the Area of Outstanding Natural Beauty</b>  <b>page 10</b>	<p>Initial query on whether there is a need to include such a policy given the District Plan includes DP16: High Weald Area of Outstanding Natural Beauty.</p> <p>Upon reflection of the reasons why the Parish Council wish to include Policy 1, it was recommended the policy is updated to reference “small scale” to ensure conformity with the strategic policies of the District Plan.</p>	<p>Policy 1 updated to read:</p> <p>Policy 1: Protecting the Area of Outstanding Natural Beauty</p> <p>Development proposals within the High Weald AONB will be supported where they conserve or enhance natural beauty and have regard to the High Weald AONB Management Plan.</p> <p><del>Development proposals</del> <u>Small scale proposals</u> which support the local economy and social well-being of the AONB will be supported where they are compatible with the conservation and enhancement of the AONB.</p> <p>Development proposals on land that contributes to the setting of the AONB will only be permitted where it does not detract from the visual qualities and essential characteristics of the AONB, in particular does not adversely affect the views into and out of the AONB by virtue of it's location and/or design.</p>
<b>Footnote 2, page 11</b>	<p>Update footnote to reflect District Plan, adoption March 2018.</p>	<p>Footnote updated to read:</p> <p><sup>2</sup> see Policy DP1<u>3</u> of the <del>Submission District Plan (June 2015)</del>, <u>March 2018</u></p>

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<b>Aim 1: Preventing Coalescence: Pease Pottage Gap</b>  <b>page 11</b>	<p>Recommend consideration is given to upgrading this Aim to a Planning Policy.</p> <p>MSDC have advised that unless this aspiration is included as a “land use” planning policy, the District will be unable to rely on the Aim to determine applications in this area. For this reason, MSDC have advised they are “uncomfortable” with the aspiration to prevent coalescence in the Pease Pottage area as an Aim and would prefer this to be included as a planning policy.</p>	<p>SPC considered:</p> <ol style="list-style-type: none"> <li>1. Upgrading the Aim to a Planning Policy. MSDC have recommended such a policy should be supported by a background paper to justify the identification of a “gap”. The supporting paper would be required to meet the requirements of District Plan Policy DP13, which requires robust evidence that development within the Gap would individually or cumulatively result in coalescence and the loss of the separate identity and amenity of nearby settlements. Evidence must demonstrate that existing local and national policies cannot provide the necessary protection.</li> <li>2. Upgrading the Aim to a Planning Policy without a supporting background paper but noting this comes with greater risk of being deleted by an Examiner.</li> <li>3. Deleting Aim 1.</li> </ol> <p>Please note MSDC have recommended a background paper takes account of sites in the area which have been identified in the Council’s Strategic Housing and Economic Land Availability Assessment. In addition, MSDC recommend the background paper takes account of the effect of recent planning permission/ development within the area.</p>
<b>Aim 2: Preserving Settlement Identity</b>  <b>page 12</b>	<p>Following a discussion on the preparation of a background paper to support Aim 1, MSDC recommend consideration is given to highlighting the importance of preserving the identity between settlements.</p> <p>MSDC advised given the different purposes of Aim 1 and Aim 2, there are no concerns at proceeding with a Submission Plan which includes Aim 2 as currently written.</p>	<p>In light of SPC decision not to prepare a background paper, this aim is unchanged.</p>

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<b>Policy 3: Development outside of Built Up Area Boundaries</b>  <b>page 12</b>	Following discussion on the purpose of the Policy and its alignment to District Plan policy, MSDC recommend the policy is updated to clearly align with DP12: Protection and Enhancement of the Countryside	Policy 3 updated to read:  Policy 3: <del>Development outside of the built up area boundaries</del> <u>Protection of the Open Countryside</u>  Development proposals <del>outside the built up area boundaries of the Parish</del> <u>in the open countryside</u> will not be supported unless it is necessary for the purposes of agriculture, or another use which has to be located in the countryside.
<b>Aim 4: Community Infrastructure Levy/para 5.17</b>  <b>page 19/20</b>	MSDC advised there is currently no timetable in place to progress the CIL.  MSDC to provide wording to reflect the current position.	Supportive text of Aim 4 updated upon receipt of suggested wording from MSDC.
<b>Footnote 6, page 21</b>	Update footnote to reflect District Plan, adopted March 2018	Footnote updated to read:  <del>as allocated through Policy DP9A of the Submission Version District Plan – August 2016</del> DP10: Strategic Allocation to the east of Pease Pottage, District Plan, March 2018

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<p><b>Para 6.2 - 6.16</b></p> <p><b>page 21/22</b></p>	<p>MSDC have advised that the housing need for the District and, in turn Parishes has been established through the adoption of the District Plan. The District Plan “gives guidance” to parishes preparing neighbourhood plan in respect of the spatial distribution of housing requirement and the minimum number of houses to be provided in each Settlement Category. In light of this MSDC recommend para 6.5-6.16 are updated to reflect the current position.</p> <p>Para 6.6 MSDC have advised updated Completions and Commitments information was published in April 2018.</p>	<p>Para 6.2 - 6.16 updated to read:</p> <p><u>As an intrinsic part of the preparation of the Neighbourhood Plan, detailed consideration has been given to the number of houses that need to be delivered in the Parish over the Plan period 2014 - 2031.</u></p> <p><u>The District Plan, which was adopted in March 2018, has established the housing need of the District. The District’s objectively assessed need (OAN) is 14,892 dwellings over the Plan period. Provision is also made for 1,498 dwellings to ensure unmet need is addressed in the Northern West Sussex Housing Market Area. This results in a District Plan minimum housing requirement over the Plan period of 16,390.</u></p> <p><u>The District Plan will facilitate the delivery of an average of 876 dwellings per annum (dpa) until 2023/24; and thereafter an average of 1,090 dpa between 2024/2025 and 2030/2031, subject to there being no further harm to the integrity of European Habitat Sites in Ashdown Forest.</u></p> <p><u>The District Council commits to commencing preparation of a Site Allocation DPD in 2017 to be adopted in 2020. In addition, they will review the District Plan, starting in 2021 with submission to Government in 2023.</u></p> <p><u>Policy DP4 of the District Plan, sets out a spatial distribution of the housing requirement by reference to a settlement. This sets out the minimum housing requirement in each settlement category over the Plan period and the minimum residual from 2017, accounting for completions and commitments.</u></p> <p><u>Policy DP6 of the District Plan identifies Handcross and Pease Pottage as Category 3 settlements. It identifies Slaugham and Warninglid as Category 4 settlements.</u></p>

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		<p>Policy DP6 of the District Plan, states outside of defined built-up area boundaries, the expansion of settlements will be supported where:</p> <ol style="list-style-type: none"> <li>1. The site is allocated in the District Plan, a Neighbourhood Plan or subsequent Development Plan Document or where the proposed development is for fewer than 10 dwellings; and</li> <li>2. The site is contiguous with an existing built up area of the settlement; and</li> <li>3. The development is demonstrated to be sustainable, including by reference to the settlement hierarchy.</li> </ol> <p>The supporting text of the Policy, provides clarity between the District housing requirement and the role of individual Neighbourhood Plans plans in meeting this. A table gives guidance on the minimum residual housing requirement within each settlement from 2017 onwards, accounting for commitments and completions. An associated footnote confirms:</p> <p><i><u>“the required minimum provision at Pease Pottage (Slaugham Parish) is significantly greater than other settlements within Category 3 due to the allocation and subsequent permission granted for 600 homes within this settlement. Due to this, the other settlements within Slaugham (Handcross, Slaugham and Warninglid) will not be required to identify further growth through the Plan process on top of windfall growth although may wish to do so to boost supply”.</u></i></p> <p>As part of the preparation of the SNP, and prior to the adoption of the District Plan, SPC undertook a Housing Needs Consideration Assessment in December 2016. This applied different methodologies to calculate housing need, reliant upon data from a variety of sources, including the Office for National Statistics. The Assessment provided a range of housing figures for growth of the Parish over the Plan period. At the lower end of the scale was zero, assuming a static population and static household formation rate, and up to 366 dwellings by extrapolating housing growth figures that occurred within the Parish between 2001 and 2011.</p>

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		<p><u>Noting the results of the Assessment, and the position of the District housing need, which at the time, was following an upward trajectory, SPC resolved that the housing need for the Parish over the Plan period is likely to be 270-310 dwellings. Given the existing supply of completions and commitments in the Parish, it was concluded that this housing need would be met without further allocations in the SNP.</u></p> <p><u>Notwithstanding this, SPC resolved to consider whether further, modest growth should be facilitated in the SNP. In doing so, SPC had regard to the pro-growth agenda of the Government as well as the increasing pressure which MSDC were under to meet local housing need requirements.</u></p> <p><u>In addition, SPC were mindful of MSDC's commitment to prepare a a Site Allocations DPD to be adopted by 2020. The DPD will allocate non-strategic and strategic sites, of any size over 5 dwellings (with no upper limit), in order to meet the remaining housing requirement of the District, as reflected in the stepped trajectory of 876dpa until 2023/2024 and 1090dpa thereafter. The District is also required to undertake a planned review of the MSDP in 2021.</u></p> <p><u>Against this national and local planning policy framework coupled with public feedback received, SPC have resolved to make housing allocation provision for further, modest housing growth in the parish over the plan period.</u></p> <p><u>Having regard to the relative scale and sustainability of the Parish's four settlements, the distribution of completed and committed housing growth and the sustainability merits of the sites considered, SPC have resolved that further growth should be directed to St.Martin Close, Handcross.</u></p>



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<p><b>Policy 12: St.Martin Close (west)</b></p> <p><b>page 23</b></p>	<p>MSDC confirmed support for the allocation of both St.Martin Close (east) and St.Martin Close (west).</p> <p>With respect to St.Martin Close (west), MSDC sought clarification on when it is envisaged the site will come forward. MSDC queried if the development of the 2 sites is to be phased.</p> <p>In addition MSDC queried access arrangements to the site.</p> <p>For the avoidance of doubt, MSDC recommend the supporting text of Policy 12: St.Martin Close (west) is updated to clarify how/when it is envisaged the site will come forward.</p>	<p>Supporting text of Policy 12 updated to read:</p> <p><u>Preparation of the SNP commenced at a time when the housing need for the District was still to be determined through the District Plan Examination. The District Plan has since been adopted with the housing requirement set at 16,390 dpa over the Plan period.</u></p> <p><u>The District have committed to commencing preparation of a Site Allocation DPD in 2017 to be adopted in 2020. This will identify further sites which have capacity of 5 or more residential units. Furthermore, the District have confirmed MSDC will review the District Plan, starting in 2021 with submission to Government in 2023.</u></p> <p><u>National Planning Policy Guidance recommends Neighbourhood Plans Neighbourhood plans should consider "...allocating reserve sites to ensure that emerging evidence of housing need is addressed". Guidance confirms this approach can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan.</u></p> <p><u>In light of this Government Guidance, and the planned early review of the District Plan, SPC have sought to positively prepare a Neighbourhood Plan which will contribute to the overall housing delivery in the District over the Plan period and seeks to not promote less development than set out in the higher tier plan.</u></p> <p><u>The SNP allocates St. Martin Close (west) as a reserve site to come forward in the second part of the Plan period following the delivery of St. Martin Close (east), if required to ensure the long-term housing need of the Parish is positively met.</u></p>

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		<p><u>Given the rural character of Coos Lane and the presence of woodland shaw, on the north west boundary of St. Martin Close (west), it is considered access is best achieved via St. Martin Close (east).</u></p> <p><u>The development of St. Martin Close (east) should plan for future vehicular and pedestrian access to St. Martin Close (west). Following the development of St. Martin Close (east), it is envisaged that development on land to the west can come forward if needed.</u></p> <p><u>In these circumstances, SPC will support development proposals for up to 35 residential units on land at St. Martin Close (west) to come forward following the delivery of land at St. Martin Close (east). It is considered a scheme will provide an appropriate mix of housing to include affordable housing in line with local planning policy.</u></p> <p><u>The design should respond to the character of the adjacent development at St. Martin (east). Proposals should ensure the retention of existing mature trees and hedgerows on the north west boundary of St. Martin Close (west). For this reason, access to the site should be gained via St. Martin Close (east).</u></p>

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<b>Policy 13: Residential Development within Settlement Boundaries</b>  <b>page 25</b>	MSDC recommend the policy is expanded to align with Policy 6 of the District Plan.	<p>Policy 13 updated to read:</p> <p>Policy 13: Residential Development within <u>and adjoining</u> Settlement Boundaries</p> <p>Proposals for residential development within the built up areas of Handcross, Pease Pottage and Waringlid (as defined on the Proposals Map) will be supported where proposals:</p> <ol style="list-style-type: none"> <li>1. Comprise high quality design;</li> <li>2. Respect the character and scale of the surrounding area;</li> <li>3. Respect the amenities of neighbours;</li> <li>4. Create safe and accessible environments; and</li> <li>5. Provide adequate parking.</li> </ol> <p><u>Proposals for residential development outside of the built up areas of Handcross, Pease Pottage and Waringlid (as defined on the Proposals Map) will be supported where:</u></p> <ol style="list-style-type: none"> <li>1. <u>The site is allocated in a Development Plan Document or where the proposed development is for fewer than 10 dwellings; and</u></li> <li>2. <u>The site is contiguous with an existing built up area of the settlement; and</u></li> <li>3. <u>The development is demonstrated to be sustainable, including by reference to the settlement hierarchy.</u></li> </ol>

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<b>Policy 14:</b> <b>Local Employment</b>  <b>page 26</b>	MSDC confirm support for the Policy.  MSDC note the policy, as currently written, goes beyond the requirements of District Plan policy (DP1: Sustainable Economic Development), as the SNP requires 6 months of marketing material to be submitted where proposals propose the loss of business/employment land.	No action required.

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<b>Policy 16: Protection of Handcross High Street</b>  <b>page 28</b>	<p>MSDC confirm support for the Policy.</p> <p>MSDC recommend the supporting text of Policy 16 references permitted development rights as set out in the District Plan.</p>	<p>Following wording included in para 7.09</p> <p><u>It is however recognised that current permitted development rights contained within the Town and Country Planning (General Permitted Development) (England) Order 2015, enables some changes of use of commercial premises to alternative use without the need for planning permission. This includes some changes to residential use.</u></p> <p>Para 7.10 updated to read:</p> <p><u>Where possible, in order to sustain the local retail economy, SPC wish to protect the High Street from proposals which seek to change the use of A1 shops and A4 drinking establishments to alternative uses. The SNP therefore seeks to resist the change of use of businesses on Handcross High Street unless it can be demonstrated the current use is no longer viable.</u></p> <p>In addition, Policy 16 updated to read:</p> <p>Policy 16: Protection of Handcross High Street</p> <p>The SNP supports the protection of existing businesses on Handcross High Street.</p> <p><u>Where planning permission is required for proposals which seek a change of use from A1/A4 to alternative uses on Handcross High Street (as detailed on the Proposals Map), <u>this</u> will not be supported unless it can be demonstrated that the current use is no longer viable.</u></p> <p>It must be demonstrated that the site has been marketed for at least 6 months with no interest being shown prior to an application being made.</p>

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<b>Proposals Map</b>	MSDC recommend the proposals map is updated to detail the site boundary of the strategic allocation at Pease Pottage.	Proposals map to be updated by MSDC.