

Cowfold Neighbourhood Plan Basic Conditions Statement



January 2020

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1. INTRODUCTION

- 1.1. This Basic Conditions Statement has been prepared by DOWSETTMAYHEW Planning Partnership for, and on behalf of, Cowfold Parish Council (CPC) in support of the preparation of the Cowfold Neighbourhood Plan (CNP).
- 1.2. In order to satisfy Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, the Parish Council, as the ‘qualifying body,’ must include a Statement explaining how the proposed Neighbourhood Development Plan meets the requirements of Paragraph 8(2) of Schedule 4B of the Town & Country Planning (T&CP) Act 1990 (as amended).
- 1.3. This Statement has been prepared in order to illustrate compliance with these requirements.
- 1.4. Section 2 of this report summarises the legislative requirements associated with these ‘Basic Conditions’; Section 3 summarises and responds to the matters that the appointed Examiner must consider; Sections 4-9 set out the Basic Conditions and assesses how the CNP meets these requirements; and Section 10 sets out how the CNP is compatible with the Convention Rights.
- 1.5. It is considered that the CNP complies with the requirements of the Basic Conditions as set out in Paragraph 8(2) of Schedule 4B of the Act.

2. LEGISLATIVE REQUIREMENTS

- 2.1. Paragraph 8 of Schedule 4B of the Town & Country Planning Act (as amended) sets out the “Basic Conditions” which the Neighbourhood Plan (NP) must comply with. Detailed below are the matters that must be considered by the appointed NP Examiner, and the “Basic Conditions” that the NP must meet, in order to be found sound and be able to progress to a Referendum.
- 2.2. Paragraph 8(1) states that the Examiner must consider the following:

- (a) Whether the draft Neighbourhood Development Plan meets the Basic Conditions (see sub-paragraph(2));
- (b) Whether the draft order complies with the provision made by or under sections 61E(2), 61J and 61L (The provision of 61E, 61J & 61L as amended by Section 38C(5)(b) is by reference to the provisions of 38A and 38B of the 2004 Compulsory Purchase Act);
- (d) Whether the area for any referendum should extend beyond the Neighbourhood Area to which the draft Neighbourhood Development Plan relates; and
- (e) Such other matters as may be prescribed.

- 2.3. Paragraph 8(2) states that a draft Neighbourhood Development Plan meets the Basic Conditions if:

- (a) Having regard to National Policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan;
- (d) The making of the order contributes to the achievement of sustainable development;
- (e) The making of the Neighbourhood Development Plan is in general conformity with the strategic Policies contained in the Development Plan for the area of the Authority (or any part of that area);
- (f) The making of the Neighbourhood Development Plan does not breach, and is otherwise compatible with, EU obligations; and
- (g) Prescribed conditions are met in relation to the Neighbourhood Development Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Development Plan.

- 2.4. The requirements of Paragraph 8(2)(b), (2)(c), (3), (4) and (5) are not of relevance to the compliance with the Basic Conditions tests.
- 2.5. Paragraph 8(6) states that the Examiner is not to consider any matter that does not fall within Sub-Paragraph 8(1), apart from considering whether the draft Neighbourhood Development Plan is compatible with the Convention Rights.

3. WHAT THE EXAMINER MUST CONSIDER

- 3.1. The following details how the requirements of Schedule 4B Paragraph 8(1) have been met.

4B 8(1)(A) - Whether The Draft NP Meets The Basic Conditions

- 3.2. This requires the NP to demonstrate compliance with Paragraph 8(2) of Schedule 4B of the T&CP Act.
- 3.3. This is considered in detail in Sections 4-9 of the Statement.

4B 8(1)(B) - Whether The Draft Order Complies With Sections 38A & 38B Of The Compulsory Purchase Act 2004

- 3.4. This requires the draft order to comply with Sections 38A & 38B of the Compulsory Purchase Act 2004.
- 3.5. Section 38A(1) sets out the “Meaning of Neighbourhood Development Plan”. S38A(1) states that “any qualifying body is entitled to initiate a process for the purpose of requiring a Local Planning Authority in England to make a Neighbourhood Development Plan.”
- 3.6. CPC is the qualifying body and entitled to submit a Neighbourhood Development Plan for their Parish.

- 3.7. S38A(2) states that a *“Neighbourhood Development Plan is a plan which sets out policies (however expressed) in relation to the development and use of land in the whole, or any part of a particular neighbourhood area specified in the plan.”*
- 3.8. The CNP sets out Policies that relate to the development and use of land within the neighbourhood area.
- 3.9. The remainder of Section 38A, Paragraphs (3)-(12), are not of relevance to the Parish Council.
- 3.10. Section 38B sets out the provisions that may be made by the Neighbourhood Development Plan. Paragraph 38B(1)(a) notes that a Neighbourhood Development Plan *“Must specify the period for which it is to have effect.”*
- 3.11. The CNP covers the period from 2019 up to 2031. The end date reflects the Plan period of the Horsham District Planning Framework (HDPF) 2014-2031.
- 3.12. Paragraph 38B(1)(b) states that a Neighbourhood Development Plan *“may not include provision about development that is excluded development.”*
- 3.13. The CNP does not include provision for excluded development (as defined in Section 61K of the Planning and Compulsory Purchase Act 2004).
- 3.14. Paragraph 38B(1)(c) states that a Neighbourhood Development Plan *“may not relate to more than one neighbourhood area”*.
- 3.15. The CNP does not relate to more than one neighbourhood area. It solely relates to the Neighbourhood Plan Area as ratified by Horsham District Council (HDC) on 16 May 2018.
- 3.16. Paragraph 38B(2) states that only one Neighbourhood Development Plan may be ‘made’ for each neighbourhood area.
- 3.17. There are currently no other NP’s in place in this neighbourhood area.
- 3.18. Paragraph 38B(3) states that, if to any extent a policy set out in a Neighbourhood Development Plan conflicts with any other statement or information in the Plan, the conflict must be resolved in favour of the policy.
- 3.19. There are no conflicts within the NP.
- 3.20. Paragraph 38B(4)(a) states that Regulations made by the Secretary of State may make provisions for *“restricting the provision that may be included in Neighbourhood Development Plans about the use of land.”*
- 3.21. These Regulations are set out in Statutory Instrument 2012 No. 637, The Neighbourhood Planning (General) Regulations 2012, which have been used to inform the process of making the CNP.

- 3.22. Paragraph 38B(4)(b) states that Regulations made by the Secretary of State may make provisions “*requiring Neighbourhood Development Plans to include such matters as are prescribed in the Regulations.*”
- 3.23. The CNP has had regard to The Neighbourhood Planning (General) Regulations 2012, Regulation 15(a), (b), (c), and (d), and has been subject to the Sustainability Appraisal (SA), including the requirements of the Strategic Environmental Assessment (SEA).
- 3.24. HDC have undertaken the requisite HRA screening. A copy of the HRA Screening is available to view in Appendix 1.
- 3.25. HDC have concluded an Appropriate Assessment of the CNP is not required. It is the consideration of Officers the sites promoted within the CNP do not impact directly on the international sites and there are appropriate mechanisms in place to negate any impact derived from development.
- 3.26. The remaining requirements of Section 38B, which include Paragraphs 38B(4)(c), 5 & 6, are not relevant to this Basic Conditions Statement.

4B 8(1)(D) - Whether The Referendum Should Extend Beyond The NP Area

- 3.27. This requires the Examiner to consider whether the area for any Referendum should extend beyond the NP Area to which it relates.
- 3.28. The CNP relates solely to land that falls within the Parish of Cowfold.

4B 8(1)(E) - Other Matters

- 3.29. This requires the Examiner to consider such other matters as may be prescribed.
- 3.30. There are no other prescribed matters.

4. COMPLIANCE WITH THE BASIC CONDITIONS

- 4.1. Paragraph 8(2) of Schedule 4B of the T&CP Act sets out the basic conditions that must be met by a draft NP. Subsections (a),(d),(e), (f), and (g) are of relevance to this Statement.
- 4.2. Set out below in Sections 5-9 is an assessment and justification of how the CNP complies with each of these basic condition tests.

5. 4B8(2)(a) - NATIONAL POLICIES

- 5.1. Section 4B 8(2)(a) states that a draft NP will meet the Basic Conditions if, having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Plan.
- 5.2. The following sets out compliance of the CNP policies and aims with those contained in higher level national guidance.
- 5.3. The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. A revised NPPF was published in February 2019.

- 5.4. It provides a framework within which locally-prepared plans for housing and other development can be produced. The NPPF must be taken into account in preparing a Development Plan. It states planning policies must also reflect international obligations and statutory requirements.

National Planning Policy Framework: February 2019

- 5.5. The NPPF confirms the purpose of the planning system is to contribute to the achievement of sustainable development. Furthermore, it confirms achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways.
- 5.6. The SA (incorporating the requirements of the SEA), prepared in support of the CNP has fully assessed the sustainability of all policies in the CNP and found them to all meet the aims of sustainable development. The following details how policies of the CNP are in accordance with the specific policies of the NPPF.
- 5.7. The following chapters of the NPPF are considered of relevance to the 4B 8(2)(a) Assessment:

- Chapter 5: Delivering a Sufficient Supply of Homes;
- Chapter 6: Building a Strong Competitive Economy;
- Chapter 8: Promoting Healthy and Safe Communities;
- Chapter 9: Promoting Sustainable Transport;
- Chapter 10: Supporting High-Quality Communications;
- Chapter 11: Making Effective Use of Land;
- Chapter 12: Achieving Well-Designed Places;
- Chapter 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change;
- Chapter 15: Conserving and Enhancing the Natural Environment; and
- Chapter 16: Conserving and Enhancing the Historic Environment.

Chapter 5 - Delivering A Sufficient Supply Of Homes

- 5.8. This chapter states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

- 5.9. In order to determine, the minimum number of homes needed, the NPPF states strategic policies should be informed by a Local Housing Need Assessment, conducted using the standard method in National Planning Guidance, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

Policies should:

- Assess and reflect the size, type and tenure of housing needed for different groups in the community;
- Specify the type of affordable housing required and expect it to be met on site unless certain circumstances apply; and
- Expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement are subject to criteria.

- 5.10. 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.

- 5.11. In identifying land for homes, the NPPF advises Neighbourhood planning groups should consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area.

- 5.12. In addition, the NPPF advises Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

- 5.13. In rural areas, the NPPF advises planning policies should:

- Be responsive to local circumstances and support housing developments that reflect local needs;
- Identify opportunities for villages to grow and thrive, especially where this will support local services; and
- Avoid the development of isolated homes in the countryside unless one or more of a number of specified circumstances apply.

- 5.14. The Census data from 2011 confirmed there were a total of 739 households (at least 1 person occupying at the time of the Census) in the Parish.
- 5.15. A detailed assessment was been undertaken of housing need. A parish housing need assessment was first prepared in April 2018. The Report was subsequently updated to take account of changes to national planning policy guidance and comments from HDC. The Report was finalised in May 2019.
- 5.16. The Assessment applied different methodologies to calculate housing need reliant upon data from a variety of sources, including the Office for National Statistics. The document considered 7 different approaches, including household formation, policy projection and economic projection. and sets out the weight to be attached to methodologies. It also sets the housing commitments and completions.
- 5.17. It concludes that, where relevant, having discounted the number of completions and commitments that have already occurred in the Parish, there is a residual housing need in the district, to be delivered over the remainder of the plan period of between 44-70 dwellings. It recommends that it would be prudent to seek to plan for the upper end of the range; and that this could be delivered via a mix of allocations and windfall.
- 5.18. The CNP includes Strategic Objectives to:

- Maintain and grow the sense of community by supporting sympathetic integrated development, consistent with local housing need enabling residents to remain in the Parish throughout their lifetime, with a suitable mix of homes and tenures.
- Ensure all new homes meet and ideally exceed minimum standards for energy efficiency and build quality noting the unavailability of mains gas within the village. They should be built to a density appropriate to the location, provide adequate off-street parking and use local materials where appropriate.

5.19. The CNP includes: Policy 9: Residential Development Principles; Policy 10: Windfall Housing; Policy 11: CNP01 Brook Hill; Policy 12: CNP03 Potters; Aim 10: Affordable Housing; and Aim 11: Retirement Accommodation.

Chapter 6 - Building a Strong Competitive Economy

5.20. This chapter states planning policies should help create the conditions in which businesses can invest, expand and adapt. Furthermore, it states significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

Policies should:

- Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the Plan period;
- Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;
- Be flexible enough to accommodate needs not anticipated in the Plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances; and
- Recognise and address the specific location requirements of different sectors. This includes making provision for clusters or networks of knowledge and data- driven, creative or high technology industries; and for storage and distribution operations at a variety of scales in suitably accessible locations.

5.21 In order to support a prosperous rural economy, planning policies should enable:

- The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- The development and diversification of agricultural and other land-based rural businesses;
- Sustainable rural tourism and leisure developments which respect the character of the countryside; and
- The retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and Places of Worship.

5.22. In addition, planning policies should recognise that sites, to meet local business and community needs in rural areas, may have to be found adjacent to, or beyond existing settlements, and in locations that are not well served by public transport.

5.23. The Census data from 2011, reveals that the number of residents of working age (16-74) was 1,371. Of this figure 1,085 (79%) were economically active, and 286 (21%) were economically inactive.

5.24. The CNP includes Strategic Objectives:

- Facilitate employment opportunities within the Parish; enabling the necessary infrastructure, including adequate mobile and broadband connections, to encourage self-employment, working from home and the associated reduction in commuting to work outside the Parish.
- Support the enhancement of public transport connections to urban centres and places of work/educational/medical facilities and the wider public transport system. This should include routes, frequency and safe bus stop pull in facilities.

5.25. The CNP includes Policy 14: Employment and Policy 15: Communications.

Chapter 8: Promoting Healthy And Safe Communities

5.26. This chapter promotes healthy and safe communities.

5.27. Policies should aim to achieve healthy, inclusive and safe places which:

- Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and
- Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

5.28. To provide the social, recreational and cultural facilities and services the community needs, planning policies should:

- Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community;
- Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services; and
- Consider the social, economic and environmental benefits of estate regeneration.

5.29. The NPPF advises, it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

5.30. The NPPF states access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. In light of this planning policies should:

- Be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision; and
- Protect and enhance Public Rights of Way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

5.31 The NPPF states the designation of land as Local Green Space through Local and Neighbourhood Plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a Plan is prepared or updated, and be capable of enduring beyond the end of the Plan period.

5.32. Local Green Space designation should only be used where the green space is:

- In reasonably close proximity to the community it serves;
- Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Local in character and not an extensive tract of land.

5.33. The CNP includes Strategic Objectives:

- Preserve and enhance Green Infrastructure, including open spaces, to maintain the look and feel of the parish as well as helping to mitigate the impact of traffic induced pollution.
- Keep the village feel and atmosphere; conserving open space, retaining the allotment provision and enhancing Cowfold as a village. Maintain the distinctive views and visual connectivity with the surrounding countryside and avoid urban sprawl. Recognise Cowfold's place within the district settlement hierarchy and enhance the village centre as a focal point.
- Ensure all sections of the community have access to medical facilities, primary education, pub, place of worship, sporting amenities, cultural activities and village shop/post office. Support youth, sport and cultural facilities in order to see the needs of the community.

- 5.34. The CNP includes: Aim 3: Village Amenities; Policy 5: Open Space; Policy 6: Community Services and Facilities; Aim 6: Medical Facilities; Aim 7: School Provision; Policy 7: Youth Facilities; Aim 8: Electric Vehicle Charging; Policy 8: Potters Allotments; and Aim 9: Community Infrastructure Levy.

Chapter 9: Promoting Sustainable Transport

- 5.35. This chapter states transport issues should be considered from the earliest stages of plan-making and development proposals. Furthermore, it advises the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Policies should:

- Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- Be prepared with the active involvement of Local Highways Authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- Provide for high-quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans); and
- Provide for any large scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.

5.36. If setting local parking standards for residential and non-residential development, policies should take into account:

- The accessibility of the development;
- The type, mix and use of development;
- The availability of, and opportunities for public transport;
- Local car ownership levels; and
- The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

5.37. Furthermore, it advises planning policies should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.

5.38. CNP includes Strategic Objectives which seek to:

- Reduce the impact of traffic, volume and speed, on air quality and include through-traffic calming measures to reduce build up of standing traffic within the AQMA. Encourage proposals that support the use of Electric Vehicles.
- Improve road crossing, footpaths and cycleways to provide better quality and safer connections throughout the parish, to places of work and adjoining communities with a focus on pedestrian safety to reduce car dependency. This should in particular meet the needs of the disabled, elderly, parents with young children and children.
- Support the enhancement of public transport connections to urban centres and places of work/education/medical facilities and the wider public transport system.
- Prioritise developments that provide improved road safety, encouraging solutions that result in improved sustainability, pedestrian and cycling facilities taking particular note of the needs of the disabled, elderly, parents with young children and children.
- Ensure developments take into account the local level of car ownership and off-street parking requirements with appropriate electric vehicle charging facilities as appropriate.

5.39. The CNP includes: Aim 12: Traffic Management; Aim 13: Road Safety; Aim 14: Sustainable Transport; Aim 15 Pedestrian and Cycling Environment; Policy 16: Car Parking Provision; Aim 16: Quiet Lanes.

Chapter 10: Supporting High Quality Communities

5.40. This chapter confirms advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

Policies should:

- Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections; and
- Set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

5.41. CNP includes a Strategic Objective which seeks to:

- Facilitate employment opportunities within the Parish; enabling the necessary infrastructure, including adequate mobile and broadband connections, to encourage self-employment, working from home and the associated reduction in commuting to work outside the Parish.

5.42. The CNP include Policy 15: Communications.

Chapter 11: Making Effective Use of Land

5.43. This chapter confirms the planning system should promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Policies Should:

- Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
- Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
- Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on, or above service yards, car parks, lock-ups and railway infrastructure);
- Support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers; and
- Reflect changes in the demand for land. This should be informed by regular reviews of both the land allocated for development in Plans, and of land availability.

5.44. With respect to achieving appropriate densities, planning policies should support development that makes efficient use of land, taking into account:

- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- Local market conditions and viability;
- The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- The desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- The importance of securing well-designed, attractive and healthy places.

5.45. Where there is an existing or anticipated shortage of land for meeting identified housing needs, the NPPF advises it is especially important that planning policies avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible;
- The use of minimum density standards should also be considered for other parts of the Plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and
- Local Planning Authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the Framework.

5.46. The CNP includes Strategic Objectives which seeks to:

- Maintain and grow the sense of community by supporting sympathetic integrated development, consistent with local housing need enabling residents to remain in the Parish throughout their lifetime, with a suitable mix of homes and tenures.
- Ensure all new homes meet and ideally exceed minimum standards for energy efficiency and build quality noting the unavailability of mains gas within the village. They should be built to a density appropriate to the location, provide, adequate off-street parking and use local materials where appropriate.

- 5.47. The CNP includes: Policy 9: Residential Development Principles; Policy 10: Windfall Housing; Policy 11: CNP01 Brook Hill; Policy 12: CNP03 Potters; Aim 10: Affordable Housing; and Aim 11: Retirement Accommodation.

Chapter 12: Achieving Well-Designed Places

- 5.48. This chapter confirms that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. It confirms good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. It advises being clear about design expectations, and how these will be tested, is essential for achieving this, together with effective engagement between applicants, communities, Local Planning Authorities and other interests throughout the process.

Policies should:

- Ensure that developments:
 - Will function well and add to the overall quality of the area, not just for the short-term but over the lifetime of the development;
 - Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive welcoming and distinctive places to live, work and visit;
 - Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.49. The CNP includes Strategic Objectives which seeks to:

- Maintain and grow the sense of community by supporting sympathetic integrated development, consistent with local housing need enabling residents to remain in the Parish throughout their lifetime, with a suitable mix of homes and tenures.
- Ensure all new homes meet and ideally exceed minimum standards for energy efficiency and build quality noting the unavailability of mains gas within the village. They should be built to a density appropriate to the location, provide, adequate off-street parking and use local materials where appropriate.

5.50. The CNP includes: Aim 3: Village Amenities; Aim 4: Light Pollution; Aim 5: Heritage Assets; Policy 4: Conservation Area; Policy 9: Residential Development Principles; Policy 10: Windfall Housing; Policy 11: CNP01 Brook Hill; Policy 12: CNP03 Potters; Aim 10: Affordable Housing; and Aim 11: Retirement Accommodation.

Chapter 14: Meeting The Challenge Of Climate Change, Flooding And Coastal Change

5.51. This chapters confirms the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

5.52. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

Policies should:

- Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

5.53. With respect to planning and flood risk, the NPPF advises inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

5.54. Furthermore, it states strategic policies should be informed by a Strategic Flood Risk Assessment, and should manage flood risk from all sources. It should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

5.55. The CNP includes Strategic Objectives which seeks to:

- Reduce the impact of traffic, volume and speed, on air quality and include through-traffic calming measures to reduce build up of standing traffic within the AQMA. Encourage proposals that support the use of electric vehicles.
- Preserve and enhance green infrastructure, including open spaces, to maintain the look and feel of the parish as well as helping to mitigate the impact of traffic induced pollution
- Build on local rural character by: preserving and enhancing access to the surrounding countryside; procuring a net gain in biodiversity; and ensuring developments are sustainable, in areas of least flood risk, with any flood risk arising from development being fully mitigated.

5.56. The CNP includes: Aim 1: Air Quality Management; Aim 2: Sustainable Development; Policy 1: Groundwater and Surface-water Flood Risk; and Aim 8: Electric Vehicle Charging.

Chapter 15: Conserving And Enhancing The Natural Environment

5.57. This chapters seeks to ensure that the planning system contributes to, and enhances the natural and local environment.

Policies should:

- Protect and enhance valued landscapes; sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- Recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- Maintain the character of the undeveloped coast, while improving public access to it where appropriate;
- Minimise impacts on, and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- Remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

5.58. With respect to habitats and biodiversity, Plans should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

5.59. With respect to ground conditions and pollution, planning policies should ensure that:

- A site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination;
- After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
- Adequate site investigation information, prepared by a competent person, is available to inform these assessments.

5.60. Planning policies should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- Mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

5.61. In addition, planning policies should:

- Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local area; and
- Ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs).

5.62. The CNP includes Strategic Objectives which seek to:

- Build on local rural character by preserving and enhancing access to the surrounding countryside; procuring a net gain in biodiversity; and ensuring developments are sustainable, in areas of least flood risk, with any flood risk arising from development being fully mitigated.
- Keep the village feel and atmosphere, conserving open space, retaining the allotment provision and enhancing Cowfold as a Village. Maintain the distinctive views and visual connectivity with the surrounding countryside and avoid urban sprawl. Recognise Cowfold's place within the district settlement hierarchy and enhance the village centre as a focal point.

5.63. The CNP includes: Aim1: Air Quality Management; Aim 2: Sustainable Development; Aim 4: Light Pollution; Policy 1: Groundwater and Surface-water Flood Risk; Policy 2: Green Infrastructure; Policy 3: Local Green Space; Aim 5: Heritage Assets; Policy 4: Conservation Area; Policy 9: Residential Development Principles; Policy 10: Windfall Housing; Policy 11: CNP01 Brook Hill; Policy 12: CNP03 Potters ; Aim 10: Affordable Housing; and Aim 11: Retirement Accommodation.

Chapter 16: Conserving And Enhancing The Historic Environment

5.64. This chapter confirms heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

5.65. It states Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- The desirability of new development making a positive contribution to local character and distinctiveness; and
- Opportunities to draw on the contribution made by the historic environment to the character of a place.

5.66. The CNP includes a Strategic Objective which seeks to:

- Conserve and enhance historic aspects of the village; protect both the setting of the Conservation Area and the settings of important local heritage assets.

5.67. The CNP includes: Aim 5: Heritage Assets; Policy 4: Conservation Area; and Policy 9: Residential Development Principles.

6. 4B 8(2)(D) SUSTAINABLE DEVELOPMENT

6.1. Section 4B 8(2)(d) states that a draft Neighbourhood Plan will meet the Basic Conditions if the making of the order contributes to the achievement of sustainable development.

6.2. The CNP is considered to fully comply with the aims of, and contribute to the achievement of, sustainable development, as set out in the various sections of the NPPF.

6.3. The CNP is accompanied by a Sustainability Appraisal (incorporating a Strategic Environmental Assessment). The purpose of which is to assess whether the CNP may have effects on a range of sustainability topics and consider alternatives and mitigation to reduce any negative impact.

6.4. The SA process has established a range of sustainability issues and options to be considered in formulating the proposals for the CNP. It has ensured consideration of a range of potential social, economic and environmental effects.

6.5. All policies contained within the Submission Version of the CNP have been tested within the SA (incorporating the requirements of the SEA) to ensure that the most sustainable policy option has been selected. The SA appraises each policy against reasonable alternatives and then compares them to the sustainable objectives. This has enabled the most sustainable policy options to be identified for inclusion within the CNP.

6.6. The CNP contributes to the achievement of sustainable development through its Strategic Objectives, Policies and Aims. The CNP comprises a balance of economic, social and environmental goals.

6.7. The environmental goals are:

- Build on local rural character by preserving and enhancing access to the surrounding countryside; procuring a net gain in biodiversity; and ensuring developments are sustainable, in areas of least flood risk, with any flood risk arising from development being fully mitigated.
- Preserve and enhance Green Infrastructure, including open spaces, to maintain the look and feel of the parish as well as helping to mitigate the impact of traffic induced pollution.
- Keep the village feel and atmosphere, conserving open space, retaining the allotment provision and enhancing Cowfold as a Village. Maintain the distinctive views and visual connectivity with the surrounding countryside and avoid urban sprawl. Recognise Cowfold's place within the district settlement hierarchy and enhance the village centre as a focal point
- Conserve and enhance historic aspects of the village; protect both the setting of the Conservation Area and the settings of important local heritage assets.

6.8. The social goals are:

- Maintain and grow the sense of community by supporting sympathetic integrated development, consistent with local housing need enabling residents to remain in the Parish throughout their lifetime, with a suitable mix of homes and tenures.
- Ensure all new homes meet and ideally exceed minimum standards for energy efficiency and build quality noting the unavailability of mains gas within the village. They should be built to a density appropriate to the location, provide, adequate off-street parking and use local materials where appropriate.
- Ensure all sections of the community have access to medical facilities, primary education, pub, place of worship, sporting amenities, cultural activities and village shop/post office. Support youth, sport and cultural facilities in order to see the needs of the community.
- Reduce the impact of traffic, volume and speed, on air quality and include through-traffic calming measures to reduce build up of standing traffic within the AQMA. Encourage proposals that support the use of Electric Vehicles.
- Improve road crossing, footpaths and cycleways to provide better quality and safer connections throughout the parish, to places of work and adjoining communities with a focus on pedestrian safety to reduce car dependency. This should in particular meet the needs of the disabled, elderly, parents with young children and children.

- Support the enhancement of public transport connections to urban centres and places of work/education/medical facilities and the wider public transport system.
- Prioritise developments that provide improved road safety, encouraging solutions that result in improved sustainability, pedestrian and cycling facilities taking particular note of the needs of the disabled, elderly, parents with young children and children.
- Ensure developments take into account the local level of car ownership and off-street parking requirements with appropriate electric vehicle charging facilities as appropriate.

6.9. The economic goals are:

- Facilitate employment opportunities within the Parish; enabling the necessary infrastructure, including adequate mobile and broadband connections, to encourage self-employment, working from home and the associated reduction in commuting to work outside the Parish.
- Support the enhancement of public transport connections to urban centres and places of work/educational/medical facilities and the wider public transport system. This should include routes, frequency and safe bus stop pull in facilities.

6.10. The CNP accordingly complies with, and contributes to, the achievement of sustainable development in its three limbs of economic, social and environmental.

7. **4B 8(2)(e) GENERAL CONFORMITY WITH THE DEVELOPMENT PLAN**

7.1. Section 4B 8(2)(e) states that a draft Neighbourhood Plan will meet the Basic Conditions if, the making of the NP is in general conformity with the strategic policies contained in the Development Plan for the area (or any part of that area).

7.2. The relevant Development Plan for the area in this instance is the HPDF. HDC adopted the HDPF in November 2015. It sets out the planning strategy for the District¹ up to 2031 and clearly sets out and identifies the strategic policies which the CNP must be in “general conformity” with. The CNP reflects these policies and plans positively to support them.

¹ HDPF does not apply to that part of the District within the South Downs National Park

7.3. The table below shows how each CNP Policy/Aim is in general conformity with the policies of the HDPF.

HDPF policy	Summary of Policy	General Conformity of CNP Polices
Policy 1 Strategic Policy: Sustainable Development.	When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.	Full conformity, all Policies and Aims.
Policy 2 Strategic Policy: Strategic Development.	<p>The spatial strategy to 2031 is to:</p> <ul style="list-style-type: none"> • Focus development in and around the key settlement of Horsham, and allow for growth in the rest of the district in accordance with the settlement hierarchy. • Recognise and develop Horsham town's role complemented by redevelopment at Broadbridge Heath Quadrant. • Bring forward three strategic development areas of at least 2,500 dwellings immediately to the north of Horsham Town, around 600 dwellings West of Southwater, and around 150 dwellings South of Billingshurst. • Bring forward a strategic mixed used opportunity at the former Novartis site for employment, education and specialist housing at the equivalent of around 200 units. • Continue to support the sustainable development of settlements. • Manage development around the edges of existing settlements in order to prevent the merging of settlements. • Provide access to strategic green space and recreational opportunities in and around the built-up urban areas. • Encourage the effective use of previously developed (brownfield land). • Identify existing sites of important employment use, safeguard their function through flexible policies and designation of Key Employment Areas. • Provide for the varied housing needs. • Support the provision of rural housing which contributes towards the provision of affordable housing. • Retain and enhance natural environmental resources. • Support development which protects, conserves and enhances the District's built heritage. • Monitor delivery of the Strategy. 	<p>Policy 1: Groundwater and Surface-water Flood Risk</p> <p>Policy 2: Green Infrastructure</p> <p>Policy 3: Local Green Space</p> <p>Aim 5: Heritage Assets</p> <p>Policy 4: Conservation Area</p> <p>Policy 9: Residential Development Principles</p> <p>Policy 10: Windfall Housing</p> <p>Policy 11: CNP01 Brook Hill</p> <p>Policy 12: CNP03 Potters</p> <p>Policy 13: Housing Mix</p>

HDPF policy	Summary of Policy	General Conformity of CNP Polices
<p>Policy 3</p> <p>Strategic Policy: Development Hierarchy.</p>	<p>Development will be permitted within towns and villages which have defined built-up areas.</p> <p>Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement in accordance with the settlement hierarchy.</p>	<p>Policy 10: Windfall Housing</p>
<p>Policy 4</p> <p>Strategic Policy: Settlement Expansion.</p>	<p>The growth of settlements across the District will continue to be supported.</p> <p>Outside built-up area boundaries, the expansion of settlements will be supported where;</p> <ul style="list-style-type: none"> • The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge. • The level of expansion is appropriate to the scale and function of the settlement type. • The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services. • The impact of the development individually or cumulatively does not prejudice comprehensive long term development • The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced. 	<p>Policy 11: CNP01 Brook Hill</p> <p>Policy 12: CNP03 Potters</p>
<p>Policy 7</p> <p>Strategic Policy: Economic Growth.</p>	<p>Sustainable employment development will be achieved by;</p> <ul style="list-style-type: none"> • Allocating land for a high quality business park at Land North of Horsham. • Redevelopment, regeneration, intensification and smart growth of existing employment sites. • The formation and development of small, start-up and move-on businesses, as well as home working and home based businesses. • Encouraging appropriate workspace and ICT infrastructure, • Retention of Key Employment Areas, for employment uses. • Promotion of the district as an attractive place to stay and visit, • Encouraging sustainable local employment growth through Neighbourhood Development Plans. • Encouraging the expansion of higher education facilities • Identifying additional employment areas. 	<p>Policy 14: Employment</p>

HDPF policy	Summary of Policy	General Conformity of CNP Policies
<p>Policy 12</p> <p>Strategic Policy: Vitality and Viability of Existing Retail Centres.</p>	<p>The hierarchy for the district's town and village centres is established as follows;</p> <ul style="list-style-type: none"> • Primary centre: Horsham town. • Secondary centres: Billingshurst, Henfield, Pulborough, Southwater, Steyning and Storrington. • Tertiary centres and outlying small retail units: Smaller village centres and shops. <p>The hierarchy of retail centres will be supported and enhanced through;</p> <p>Positive measures to improve Horsham town centre as the primary centre. The other town and village centres within the district will be encouraged to help sustain their roles in meeting needs and acting as a focus for a range of activities.</p> <p>Promotion and encouragement of activities in town and village centres so they continue to be the prime focus for community life in the district by:</p> <ul style="list-style-type: none"> • Maintaining a diverse range and choice of suitable uses. • A well designed and maintained attractive public realm. • Promotions, outdoor events and entertainment and markets. • A choice of accessible and affordable means of travel. • Respect for historic character and good urban design principles. • A convenient, cohesive and concentrated primary area which contains a high proportion of retail (A1) uses. • In the larger centres encouragement for variety in the "offer" which for Horsham town centre has meant the identification of distinct "quarters" that define character and ambiance. • For the secondary areas defined within larger town centres a wider range of class A uses as well as other use classes can be located. • Suitable residential use in existing older and new buildings. 	<p>Aim 3: Village Amenities</p> <p>Policy 14: Employment</p>

HDPF policy	Summary of Policy	General Conformity of CNP Policies
<p>Policy 15</p> <p>Strategic Policy: Housing Provision.</p>	<p>Provision is made for the development of at least 16,000 homes and associated infrastructure; 2011-2031, at an average of 800 homes per annum.</p> <p>This will be achieved by:</p> <ul style="list-style-type: none"> • Housing completions for the period 2011 – 2015 • Homes that are already permitted or agreed for release; • Strategic Sites: <ul style="list-style-type: none"> a) At least 2,500 homes at Land North of Horsham. b) Around 600 homes at Land West of Southwater. c) Around 150 homes at Land South of Billingshurst. • The provision of at least 1500 homes throughout the district in accordance with the settlement hierarchy, allocated through neighbourhood planning. • 750 windfall units. 	<p>Policy 9: Residential Development Principles</p> <p>Policy 10: Windfall Housing</p> <p>Policy 11: CNP01 Brook Hill</p> <p>Policy 12: CNP03 Potters</p> <p>Policy 13: Housing Mix</p>
<p>Policy 16</p> <p>Strategic Policy: Meeting Local Housing Needs.</p>	<p>Development should provide a mix of housing sizes, types and tenures.</p> <p>All residential developments of 5 dwellings or more will be expected to include an appropriate proportion of affordable homes in accordance with the following thresholds and targets:</p> <ul style="list-style-type: none"> a. On sites providing 15 or more dwellings, or on sites over 0.5 hectares, the Council will require 35% of dwellings to be affordable. b. On sites providing between 5 and 14 dwellings, the Council will require 20% of dwellings to be affordable or where on-site provision is not achievable a financial contribution equivalent to the cost of the developer of providing the units on site. <p>If a development site is sub-divided so as to create two or more separate development schemes one or more of which falls below the relevant threshold, the Council will seek an appropriate level of affordable housing to reflect the provision that would have been achieved on the site as a whole had it come forward as a single scheme for the site.</p> <p>The Council will support schemes being brought forward through Neighbourhood Plans.</p>	<p>Policy 11: CNP01 Brook Hill</p> <p>Policy 12: CNP03 Potters</p> <p>Aim 10: Affordable Housing</p>

HDPF policy	Summary of Policy	General Conformity of CNP Policies
<p>Policy 21</p> <p>Strategic Policy: Gypsy and Traveller Sites Allocations.</p>	<p>Provision shall be made for 39 net additional permanent residential pitches for Gypsies and Travellers within the period 2011 – 2017.</p> <p>In order to help fulfil the current backlog of unmet need and future need identified through the Council’s Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, the following sites have been identified and will be allocated for traveller site development</p> <ul style="list-style-type: none"> • Rowfold Nurseries, Coneyhurst (10) • Southview, Five Oaks (4) • Land adjacent Hillside Park, Small Dole (12) • Lane Top, Pulborough (3) • Sites that have been granted planning permission since the study (13). 	<p>Reliant on HDPF policies.</p>
<p>Policy 23</p> <p>Strategic Policy: Gypsy and Traveller Accommodation</p>	<p>The following criteria will be taken into consideration when determining the allocation of land for Gypsies, Travellers and Travelling Showpeople and any planning applications for non-allocated sites:</p> <ul style="list-style-type: none"> • There must be no significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where conventional housing would not be suitable. • The site is served by a safe and convenient vehicular and pedestrian access. • The site can be properly serviced and is supplied with essential services. The site must also be large enough to provide adequate vehicle parking. • The site is located in or near to existing settlements, or is part of an allocated strategic location, within reasonable distance of a range of local services and community facilities. • The development will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings. <p>In assessing sites for Travelling Showpeople or where mixed-uses are proposed, the site and its surrounding context must be suitable for mixed residential and business uses, including storage required and/or land required for exercising animals, and would not result in an unacceptable loss of amenity and adverse impact on the safety and amenity of the site’s occupants and neighbouring properties.</p>	<p>Reliant on HDPF policies.</p>

HDPF policy	Summary of Policy	General Conformity of CNP Policies
<p>Policy 24</p> <p>Strategic Policy: Environmental Protection.</p>	<p>The high quality of the district's environment will be protected.</p> <p>Developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution and ensure that they:</p> <ul style="list-style-type: none"> • Address land contamination; • Are appropriate to their location; • Maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies, and prevents contaminated run-off to surface water sewers; • Minimise the air pollution and greenhouse gas emissions • Contribute to the implementation of local Air Quality Action Plans; • Maintain or reduce the number of people exposed to poor air quality including odour; • Ensure that the cumulative impact of all relevant committed developments is appropriately assessed. 	<p>Aim 1: Air Quality Management</p> <p>Aim 4: Light Pollution</p> <p>Policy 1: Groundwater and Surface-water Flood Risk</p>
<p>Policy 25</p> <p>Strategic Policy: The Natural Environment and Landscape Character.</p>	<p>The Natural Environment and landscape character of the District, together with protected landscapes and habitats will be protected against inappropriate development. The Council will support development proposals which:</p> <ul style="list-style-type: none"> • Protects, conserves and enhances the landscape and townscape character. • Maintains and enhances the Green Infrastructure Network and addresses any identified deficiencies. • Maintains and enhances the existing network of geological sites and biodiversity. • Conserve and where possible enhance the setting of the South Downs National Park. 	<p>Aim 4: Light Pollution</p> <p>Policy 2: Green Infrastructure</p>

HDPF policy	Summary of Policy	General Conformity of CNP Policies
<p>Policy 26</p> <p>Strategic Policy: Countryside Protection.</p>	<p>Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development.</p> <p>Any proposal must be essential to its countryside location, and meet one of the following criteria:</p> <ul style="list-style-type: none"> • Support the needs of agriculture or forestry; • Enable the extraction of minerals or the disposal of waste; • Provide for quiet informal recreational use; or • Enable the sustainable development of rural areas. <p>In addition, proposals must be of a scale appropriate to its countryside character and location.</p> <p>Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located.</p>	<p>Reliant on HDPF policies.</p>
<p>Policy 27</p> <p>Strategic Policy: Settlement Coalescence</p>	<p>Landscapes will be protected from development which would result in the coalescence of settlements.</p> <p>Development between settlements will be resisted unless it can be demonstrated that:</p> <ul style="list-style-type: none"> • There is no significant reduction in the openness and ‘break’ between settlements. • It does not generate urbanising effects within the settlement gap. • Redevelopment of existing sites that seek to reduce the existing urbanised character and appearance of an area between settlements, particularly along road corridors, will be supported. • Proposals contribute to the conservation, enhancement and amenity of the countryside, including where appropriate enhancements to the Green Infrastructure network or provide opportunities for quiet informal recreation. 	<p>Reliant on HDPF policies.</p>

HDPF policy	Summary of Policy	General Conformity of CNP Polices
<p>Policy 32</p> <p>Strategic Policy: The Quality of New Development</p>	<p>Development will be expected to:</p> <ul style="list-style-type: none"> • Provide an attractive, functional, accessible, safe and adaptable environment; • Complement locally distinctive characters and heritage; • Contribute a sense of place; • Optimise the potential of the site to accommodate development and contribute to the support for suitable complementary facilities and uses; and • Help secure a framework of high quality open space 	<p>Aim 4: Light Pollution</p> <p>Aim 5: Heritage Assets</p> <p>Policy 4: Conservation Area</p> <p>Policy 5: Open Space</p> <p>Policy 9: Residential Development Principles</p> <p>Policy 10: Windfall Housing</p> <p>Policy 11: CNP01 Brook Hill</p> <p>Policy 12: CNP03 Potters</p>
<p>Policy 35</p> <p>Strategic Policy: Climate Change.</p>	<p>Development will be supported where it makes a clear contribution to mitigating and adapting to the impacts of climate change and to meeting the District's carbon reduction target.</p> <p>Development must be designed so that it can adapt to the impacts of climate change, reducing vulnerability, particularly in terms of flood risk, water supply and changes to the district's landscape.</p>	<p>Aim 1: Air Quality Management</p> <p>Aim 2: Sustainable Development</p> <p>Policy 1: Groundwater and Surface-water Flood Risk</p> <p>Policy 9: Residential Development Principles</p>

HDPF policy	Summary of Policy	General Conformity of CNP Polices
<p>Policy 36</p> <p>Strategic Policy: Appropriate Energy Use</p>	<p>All development will be required to contribute to clean, efficient energy in Horsham.</p> <p>Commercial and residential developments in Heat Priority Areas or the strategic development locations will be expected to connect to district heating network.</p> <p>All (C)CHP must be of a scale and operated to maximise the potential for carbon reduction.</p> <p>All applications for residential or commercial development must include an Energy Statement.</p> <p>Developments in Heat Priority Areas and strategic developments should demonstrate and quantify how the development will comply with the heating and cooling hierarchy.</p> <p>The Council will permit schemes for renewable energy (e.g. solar) where they do not have a significant adverse effect.</p>	<p>Aim 2: Sustainable Development</p> <p>Policy 9: Residential Development Principles</p>
<p>Policy 38</p> <p>Strategic Policy: Flooding.</p>	<p>Development proposals will follow a sequential approach to flood risk management, giving priority to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. Proposals will be supported where they;</p> <p>Comply with the recommendations set out in the Strategic Flood Risk Assessment (SFRA).</p> <p>Incorporate the use of sustainable drainage systems (SuDS) where technically feasible.</p> <p>Consider the vulnerability and importance of local ecological resources such as water quality and biodiversity when determining the suitability of SuDS.</p> <p>Utilise drainage techniques that mimic natural drainage patterns.</p> <p>Are in accordance with the objective of the Water Framework Directive, and accord with the findings of the Gatwick Sub Region Water Cycle Study.</p>	<p>Policy 1: Groundwater and Surface-water Flood Risk</p>

HDPF policy	Summary of Policy	General Conformity of CNP Policies
<p>Policy 39</p> <p>Strategic Policy: Infrastructure Provision.</p>	<p>The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development, or suitable necessary mitigation arrangements for the improvement of the infrastructure caused by the development being provided.</p> <p>Where there is a need for extra capacity, this will need to be provided in time to serve the development.</p> <p>Arrangements for new or improved infrastructure provision, will be secured by planning obligation / Community Infrastructure Levy.</p>	<p>Policy 6: Community Services and Facilities</p> <p>Aim 6: Medical Facilities</p> <p>Aim 7: School Provision</p> <p>Policy 7: Youth Facilities</p> <p>Aim 8: Electric Vehicle Charging</p> <p>Policy 8: Potters Allotments</p> <p>Aim 9: Community Infrastructure Levy.</p> <p>Policy 15: Communications</p> <p>Aim 15 Pedestrian and Cycling Environment</p>
<p>Policy 42</p> <p>Strategic Policy: Inclusive Communities</p>	<p>Positive measures which help create a socially inclusive and adaptable environment for a range of occupiers and users to meet their long term needs will be encouraged and supported. Particular account will be taken of the need to address the requirements stemming from:</p> <ul style="list-style-type: none"> • The needs of an aging population; • People with additional needs, including the disabled or those with learning disabilities; • The requirements of rural workers or essential workers in rural areas; • The co-ordination of services to fulfill the needs of young people; • The specific needs of minority groups within the district, including Gypsies and Traveller's; and • The specific needs of faith and other community groups 	<p>Policy 6: Community Services and Facilities</p> <p>Aim 6: Medical Facilities</p> <p>Aim 7: School Provision</p> <p>Policy 7: Youth Facilities</p> <p>Policy 13: Housing Mix</p> <p>Aim 10: Affordable Housing</p> <p>Aim 11: Retirement Accommodation</p>

7.4. The table below sets out the Policies and Aims of the CNP and summarises the paragraphs of the NPPF and the Strategic Policies of the HDPF which they are in conformity with;

CNP Policy/Aim	NPPF	HDPF
Aim 1: Air Quality Management	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 9: Promoting sustainable transport.</p> <p>Chapter 15: Conserving and enhancing the natural environment.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 24 Strategic Policy Environmental Protection</p> <p>Policy 35 Strategic Policy Climate Change</p>
Aim 2: Sustainable Development	<p>Chapter 2: Achieving sustainable development.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 35 Strategic Policy Climate Change.</p> <p>Policy 36 Strategic Policy Appropriate Energy Use</p>
Aim 3: Village Amenities	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 6: Building a strong competitive economy.</p> <p>Chapter 8: Promoting healthy and safe communities.</p> <p>Chapter 9: Promoting sustainable transport.</p> <p>Chapter 12: Achieving well-designed places.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 7 Strategic Policy Economic Growth.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p> <p>Policy 42 Strategic Policy Inclusive Communities</p>

CNP Policy/Aim	NPPF	HDPF
<p>Aim 4: Light Pollution</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 15: Conserving and enhancing the natural environment.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 27 Strategic Policy Settlement Coalescence</p>
<p>Policy 1: Groundwater and Surface-water Flood Risk</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 14: Meeting the challenge of climate change, flooding and coastal change.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 24 Strategic Policy Environmental Protection</p> <p>Policy 35 Strategic Policy Climate Change.</p> <p>Policy 38 Strategic Policy Flooding</p>
<p>Policy 2: Green Infrastructure</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 15: Conserving and enhancing the natural environment.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 27: Strategic Policy Settlement Coalescence</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 35 Strategic Policy Climate Change.</p> <p>Policy 38 Strategic Policy Flooding</p>

CNP Policy/Aim	NPPF	HDPF
Policy 3: Local Green Space	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 8: Promoting healthy and safe communities.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p>
Aim 5: Heritage Assets	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 16: Conserving and enhancing the historic environment.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development</p> <p>Policy 35 Strategic Policy Climate Change.</p>
Policy 4: Conservation Area	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 16: Conserving and enhancing the historic environment.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy: The Quality of New Development</p> <p>Policy 35 Strategic Policy: Climate Change.</p>
Policy 5: Open Space	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 8: Promoting healthy and safe communities.</p> <p>Chapter 11: Making effective use of land.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p>

CNP Policy/Aim	NPPF	HDPF
<p>Policy 6: Community Services and Facilities</p>	<p>Chapter 2: Achieving sustainable development</p> <p>Chapter 8: Promoting healthy and safe communities.</p> <p>Chapter 11: Making effective use of land.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p>
<p>Aim 6: Medical Facilities</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 8: Promoting healthy and safe communities.</p> <p>Chapter 11: Making effective use of land.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p>
<p>Aim 7: School Provision</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 8: Promoting healthy and safe communities.</p> <p>Chapter 11: Making effective use of land.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p> <p>Policy 42: Strategic Policy Inclusive Communities</p>
<p>Policy 7: Youth Facilities</p>	<p>Chapter 2: Achieving sustainable development</p> <p>Chapter 8: Promoting healthy and safe communities.</p> <p>Chapter 11: Making effective use of land.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p>

CNP Policy/Aim	NPPF	HDPF
Aim 8: Electric Vehicle Charging	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 12: Achieving well-designed places.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 35 Strategic Policy Climate Change.</p>
Policy 8: Potters Allotments	<p>Chapter 2: Achieving sustainable development</p> <p>Chapter 8: Promoting healthy and safe communities.</p> <p>Chapter 11: Making effective use of land.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p>
Aim 9: Community Infrastructure Levy.	Chapter 2: Achieving sustainable development.	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p>
Policy 9: Residential Development Principles	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 5: Delivering a sufficient supply of homes.</p> <p>Chapter 12: Achieving well-designed places.</p> <p>Chapter 15: Conserving and enhancing the natural environment.</p> <p>Chapter 16: Conserving and enhancing the historic environment.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p>

CNP Policy/Aim	NPPF	HDPF
<p>Policy 10: Windfall Housing</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 5: Delivering a sufficient supply of homes.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 3 Strategic Policy Development Hierarchy</p> <p>Policy 4 Strategic Policy Settlement Expansion</p>
<p>Policy 11: CNP01 Brook Hill</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 5: Delivering a sufficient supply of homes.</p> <p>Chapter 8: Promoting healthy and safe communities.</p> <p>Chapter 9: Promoting sustainable transport.</p> <p>Chapter 11: Making effective use of land.</p> <p>Chapter 12: Achieving well-designed places</p> <p>Chapter 15: Conserving and enhancing the natural environment.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 4 Strategic Policy Settlement Expansion</p> <p>Policy 15 Strategic Policy Housing Provision</p> <p>Policy 16: Strategic Policy Meeting Local Housing Needs</p> <p>Policy 24 Strategic Policy Environmental Protection</p> <p>Policy 25 Strategic Policy The Natural Environment and Landscape Character.</p> <p>Policy 26 Strategic Policy Countryside Protection.</p> <p>Policy 27: Strategic Policy Settlement Coalescence</p> <p>Policy 32 Strategic Policy: The Quality of New Development.</p> <p>Policy 35 Strategic Policy Climate Change.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p> <p>Policy 42: Strategic Policy Inclusive Communities</p>

CNP Policy/Aim	NPPF	HDPF
<p>Policy 12: CNP03 Potters</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 5: Delivering a sufficient supply of homes.</p> <p>Chapter 8: Promoting healthy and safe communities.</p> <p>Chapter 9: Promoting sustainable transport.</p> <p>Chapter 11: Making effective use of land.</p> <p>Chapter 12: Achieving well-designed places</p> <p>Chapter 15: Conserving and enhancing the natural environment.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 4 Strategic Policy Settlement Expansion</p> <p>Policy 15 Strategic Policy Housing Provision</p> <p>Policy 16: Strategic Policy Meeting Local Housing Needs</p> <p>Policy 24 Strategic Policy Environmental Protection</p> <p>Policy 25 Strategic Policy The Natural Environment and Landscape Character.</p> <p>Policy 26 Strategic Policy Countryside Protection.</p> <p>Policy 27: Strategic Policy Settlement Coalescence</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 35 Strategic Policy Climate Change.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p> <p>Policy 42 Strategic Policy: Inclusive Communities</p>

CNP Policy/Aim	NPPF	HDPF
Policy 13: Housing Mix	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 5: Delivering a sufficient supply of homes.</p> <p>Chapter 11: Making effective use of land.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 15 Strategic Policy Housing Provision</p> <p>Policy 16: Strategic Policy Meeting Local Housing Needs</p>
Aim 10: Affordable Housing	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 5: Delivering a sufficient supply of homes.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 15 Strategic Policy Housing Provision</p> <p>Policy 16: Strategic Policy Meeting Local Housing Needs</p>
Aim 11: Retirement Accommodation	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 5: Delivering a sufficient supply of homes.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p>
Policy 14: Employment	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 6: Building a strong competitive economy.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 7 Strategic Policy Economic Growth.</p>

CNP Policy/Aim	NPPF	HDPF
Policy 15: Communications	Chapter 2: Achieving sustainable development Chapter 10: Supporting high quality communications	Policy 1 Strategic Policy Sustainable Development. Policy 2 Strategic Policy Strategic Development. Policy 7 Strategic Policy Economic Growth.
Aim 12: Traffic Management	Chapter 2: Achieving sustainable development. Chapter 9: Promoting sustainable transport.	Policy 1 Strategic Policy Sustainable Development. Policy 2 Strategic Policy Strategic Development.
Aim 13: Road Safety	Chapter 2: Achieving sustainable development. Chapter 9: Promoting sustainable transport.	Policy 1 Strategic Policy: Sustainable Development. Policy 2 Strategic Policy Strategic Development.
Aim 14: Sustainable Transport	Chapter 2: Achieving sustainable development. Chapter 9: Promoting sustainable transport.	Policy 1 Strategic Policy Sustainable Development. Policy 2 Strategic Policy Strategic Development.
Aim 15 Pedestrian and Cycling Environment	Chapter 2: Achieving sustainable development. Chapter 9: Promoting sustainable transport.	Policy 1 Strategic Policy Sustainable Development. Policy 2 Strategic Policy Strategic Development. Policy 32 Strategic Policy The Quality of New Development. Policy 39 Strategic Policy Infrastructure Provision.

CNP Policy/Aim	NPPF	HDPF
<p>Policy 16: Car Parking Provision</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 9: Promoting sustainable transport.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy The Quality of New Development.</p> <p>Policy 39 Strategic Policy Infrastructure Provision.</p>
<p>Aim 16: Quiet Lanes</p>	<p>Chapter 2: Achieving sustainable development.</p> <p>Chapter 9: Promoting sustainable transport.</p>	<p>Policy 1 Strategic Policy Sustainable Development.</p> <p>Policy 2 Strategic Policy Strategic Development.</p> <p>Policy 32 Strategic Policy: The Quality of New Development.</p>

8. 4B 82(f) COMPATIBLE WITH EU OBLIGATIONS

- 8.1. Section 4B 8(2)(f) states that a draft Neighbourhood Plan will meet the Basic Conditions if, the making of the Neighbourhood Plan does not breach, and is otherwise compatible with EU obligations.
- 8.2. The SA submitted with the CNP includes the provisions of a Strategic Environmental Assessment (SEA) which is required by European Law.
- 8.3. A Scoping Report of the SA (including the requirements of the SEA) was submitted to Historic England, the Environment Agency and Natural England for assessment against environmental requirements.
- 8.4. Amendments and additional document/objectives were then considered when the SA was formally prepared. The SA is a live document and has been continually updated.
- 8.5. HDC have undertaken the requisite HRA screening. A copy of the HRA Screening is available to view in Appendix 1.
- 8.6. The CNP does not breach any EU obligations and would be otherwise compatible with all EU obligations.

9. 4B 8(2)(g) COMPLIANCE WITH PRESCRIBED CONDITIONS AND MATTERS

- 9.1. Section 4B 8(2)(g) states that a draft Neighbourhood Plan will meet the Basic Conditions if prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matters have been complied with.
- 9.2. The Basic Conditions as set out in Schedule 4B to the Town and Country Planning Act 1990, and the prescribed conditions and matters are considered to be met by the CNP. It is therefore submitted that the CNP complies with Paragraph 8(1)(a) of Schedule 4B of the Act.

10. 4B 8(6) COMPATIBILITY WITH CONVENTION RIGHTS

- 10.1. Section 4B 8(6) states that the Examiner is not to consider any matter that does not fall within Sub-Paragraph 4B(1), apart from considering whether the draft Neighbourhood Plan is compatible with Convention Rights.
- 10.2. The CNP has regard to the fundamental rights and freedoms guaranteed under the EU convention on human rights. It has particularly had regard to Article 1 - Respecting Rights, Article 8 - Privacy and Article 14 - Discrimination. It is submitted that the CNP complies with the Human Rights Act 1998.

APPENDIX 1

**(HORSHAM DISTRICT COUNCIL: HABITAT
REGULATIONS ASSESSMENT SCREENING)**

Habitat Regulations Assessment Screening

Neighbourhood Development Plans in Horsham District

Cowfold Neighbourhood Plan

January 2020

1.0 Introduction

- 1.1 In order to protect biodiversity at an international scale, European wide legislation¹ has established a network of nature conservation sites which have been designated for their ecological importance. Sites that have been designated to conserve wild bird species are known as Special Protection Areas (SPAs); other habitats and species are protected through designations known as Special Areas of Conservation (SACs). In addition wetlands of worldwide importance for biodiversity have been designated as RAMSAR sites.
- 1.2 In order to ensure that there is no deterioration in the integrity of SPAs, SACs or RAMSAR (hereafter referred to as international sites) sites, legislation² requires that when plans or programmes are being prepared, it is considered whether the effects arising from the plan could have a significant impact on the internationally designated sites. This process is known as Habitat Regulations Assessment. The process can be broken down into four stages set out in the table below:

Table 1: Stages of Habitat Regulation Assessment

Stage	Description
Stage 1: Screening	This stage considers whether a plan alone or in combination with other plans is likely to have a significant effect on an international site. If not the process stops at this stage. If impacts may arise then a more detailed 'Appropriate Assessment' is needed. It should be noted that the Habitat Regulation Assessment Process is based on the 'precautionary principle'. This means that where it is not certain whether or not a plan will have adverse impacts, the potential for adverse effects is assumed.
Stage 2: Appropriate Assessment	This process looks how a plan could be fine-tuned as it emerges to ensure that significant impacts to nature conservation sites are avoided . For example this could include changing the wording of a planning policy. If impacts can be avoided, stages three and four are not required
Stage 3: Assessment of Alternative Solutions	If a plan is found that it would have an adverse impact on the integrity of an international site, alternatives to the plan should be considered from the earliest possible stage.

¹ European Directive (92/43/EEC)

² The Conservation of Habitats and Species (Amendment) Regulations 2012, SI2012 No. 1927

Stage 4: Compensation Measures	If there are no alternatives to a plan, and it can be demonstrated that the plan is necessary for 'imperative reasons of overriding public interest' compensation measures to offset the adverse impacts are required. It is unlikely that a Local or Neighbourhood Plan would meet this test.
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- 1.3 Within Horsham District, a number of Neighbourhood Development Plans are being prepared. These plans will identify sites for housing and employment development and it must therefore be considered whether these plans will have any adverse impacts on any international site. This report therefore sets out the results of the Habitat Regulations Screening Assessment for the Neighbourhood Development Plans that are being prepared in Horsham District.

2.0 Background to Habitat Regulation Assessment in Horsham District

Higher level development Plans

- 2.1 Neighbourhood Development Plans do not exist in isolation, and instead sit within the wider national and district level framework for planning. The National Planning Policy Framework 2018 (NPPF) sets the broad social, environmental and economic policies in which development can take place. It has a presumption in favour of sustainable development, although paragraph 177 makes it clear this does not apply where development requiring appropriate assessment is being considered, planned or determined.
- 2.2 Within Horsham District, it is anticipated that the strategic policies against which planning proposals are considered is the Horsham District Planning Framework (HDPF) which was adopted on the 27 November 2015. The HDPF was subject to Habitats Regulation Assessment Screening and Appropriate Assessment (Table 1 - stage 1 and 2).
- 2.3 Neighbourhood Development Plans prepared in Horsham District to date have been written to be in conformity with strategic policies identified in the Horsham District Planning Framework. In terms of assessing whether Neighbourhood Plans will have any adverse impacts on an international site the starting point for this screening assessment has been the Habitat Regulation Assessment (April 2015) undertaken for the HDPF, **and this report should be read in conjunction with that document**. This assessment considers the impact of strategic development and the general requirement for at least 1,500 homes to be identified and delivered through Neighbourhood Development Plans across the district, in cumulation with other District level plans.

Horsham District Council Habitats Regulation Assessment April 2015

- 2.4 The Habitat Regulations Assessment of the HDPF identified two key international sites which could be impacted by development of the quantum identified in the HDPF. These sites and their reason for designation are set out in table 2 below.

Table 2 – International Sites

Name of site	approx. distance (km) from Horsham DC boundary	Reason for designation
Arun Valley SPA/Ramsar	inside HDC boundary (but within South Downs National Park)	Internationally important wintering population of Bewick swan. Additionally the SPA qualifies as over winter the area regularly supports 27,241 individual waterfowl (5 year peak mean for 1992/93 to 1996/97).
Arun Valley SAC	inside HDC boundary (but within South Downs National Park)	Ramshorn snail (<i>Anisus vorticulus</i>) for which this is considered to be one of the best areas in the United Kingdom.
The Mens SAC	2 straight line 3.5 by road	Extensive area of mature beech woodland rich in lichens, bryophytes, fungi and saproxylic invertebrates. One of the largest tracts of Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range. Also supports Barbastelle bats.

- 2.5 As part of the screening of the HDPF, it was considered whether other international sites within 20km of the HDC boundary could be affected by development in Horsham district. Taking into account the reasons for the designation of these sites, it was concluded that development of land within Horsham district, which includes sites in neighbourhood plans, was too distant to have any impact on their integrity and they were screened out of any further assessment. These sites were therefore screened out of the need for further Appropriate Assessment (Table 1 stage 2) of NDPs during the initial Appropriate Assessment Screening. It was however recognised that further screening may be appropriate in the future as part of the Local Plan Review.
- 2.6 Since the initial Screening was undertaken, Wealden District Council have objected to some planning applications in Horsham District on the basis that the traffic increases generated by these developments may, in combination with other development in the south east, have an adverse impact on the Ashdown Forest. It is therefore appropriate to revisit the screening assessment to consider whether the proposed housing in the Cowfold Neighbourhood Development Plan (CDP) has any potential to impact on the Ashdown Forest in particular. It is not considered that other European sites that were screened out of the HDC Appropriate Assessment need to be revisited prior to the commencement of the Local Plan Review.

Ashdown Forest

Name of site	approx. distance (km) from Cowfold boundary	Reason for designation
Ashdown Forest SAC	Approx 30 KM at the closest point to A275 / A22 Junction	European dry Heaths – for which this is considered to be one of the best areas in the UK together with North Atlantic Wet Heaths with <i>Erica tetralix</i> for which this is considered to be one of the best areas on the UK. The site also supports a significant presence of great crested newts although this is not a primary reason for designation

2.7 Some of Ashdown Forest is also designated as a SPA due to the population of Dartford Warblers. This element remains screened out of the assessment as they are primarily at risk from disturbance when nesting, and the recreational pressure on the Ashdown Forest from a 40km distance is considered not to be sufficiently close to generate impacts. (This is currently accepted to be within a 7km radius).

2.8 A number of conservation objectives have been identified for the Ashdown Forest SAC to ensure the site achieves favourable conservation status for its qualifying features by maintaining or restoring:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;
- Supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
- The populations of qualifying species;
- The distribution of qualifying species within the site.

As of January 2020, the status of the SSSI (which includes the Ashdown Forest SAC) was as follows

% Favourable	% Unfavourable recovering	% Unfavourable no change	% Unfavourable declining	% Destroyed / part destroyed
20.31%	79.29%	0.00%	0.40%	0.00%

2.9 The key risk from development plans on the conservation objectives of the Ashdown Forest SAC is from atmospheric pollution. This is a widespread issue and includes transboundary sources over which the neighbourhood plan has no control. Local pollutant sources can affect designated sites, particularly in relation to protected habitats within SACs, and especially from road traffic emissions. Cowfold is some

considerable distance from the Ashdown Forest, but road traffic emissions depending on the scale, location and distribution of development, may (in combination with other plans) affect the way in which locally emitted pollutants reach the site.

2.10 Qualifying habitats most sensitive to air pollution within Ashdown Forest are European dry heaths and North Atlantic wet heaths. The main pollutant effects of interest are acid deposition and eutrophication by nitrogen deposition. Oxides of nitrogen (NOX) (or sulphur dioxide) reacting with rain/cloudwater to form nitric (or sulphuric) acid, and is caused primarily by energy generation, as well as road traffic and industrial combustion. Both wet and dry acid deposition have been implicated in the damage and destruction of vegetation (heather, mosses, liverworts and lichens are particularly susceptible to cell membrane damage due to excessive pollutant levels) and in the degradation of soils and watercourses (including acidification and reduced microbial activity).

2.11 The Horsham District Planning Framework already contains measures to seek to ensure that there are no adverse impacts on the Integrity of international sites. These will also apply to any applications for development in Cowfold Parish. In relation to air quality Policy 24 (Environment Protection) requires that development

“ minimises exposure to and emission of pollutants including ... air... and ensure that they....

“minimise air pollution and greenhouse gas emissions in order to protect human health and the environment”

Policy 40 – transport, also seeks to provide for a range of sustainable transport measures.

Although both these policies contain measures that will minimise impacts in relation to air quality, further screening has been undertaken in the context of the Cowfold Neighbourhood Development Plan and the potential for impacts to arise on the Ashdown Forest.

Arun Valley and the Mens

2.12 As both the Arun Valley and the Mens SPA had the potential to be adversely impacted by the plans and policies in the HDPF, an Appropriate Assessment of the HDPF was undertaken. This assessment process resulted in suggested changes to the HDPF after which it was concluded that the HDPF (alone or in combination with other plans) will not have an adverse impact on the European sites. The impacts and mitigation proposed are summarised in table 3.

Table 3 –Measures to avoid adverse impacts on the integrity of International Sites

Site potentially affected	Impact	Effect	Mitigation in the HDPF
Arun Valley SPA/SAC/Ramsar	Increased water demand from new housing.	Low river flows/ groundwater levels and consequent water availability issues in wetland sites.	HDPF Policy (38) Flooding – requires that water quality and availability is maintained.
	Increased water demand from new housing.	Water quality deterioration in wetland sites, especially eutrophication through high phosphorus levels.	Policy 37 38 24 – These policies require that there is no pollution of watercourses, groundwater accord with the WFD and provide necessary upgrades to e.g. sewage works before development can take place. Policy 37 also limits demand for water usage from new housing.
	Increased housing development causing faster run- off and higher flood peaks.	Heightened downstream flood risk in wetland sites, damaging vegetation through prolonged deep flooding in winter, while summer floods threaten invertebrates and make essential site management difficult or impossible.	Policy 35 and 38 Policies require that technically feasible solutions to reduce flood risk (and Suds) are incorporated into developments, and design measures are incorporated into developments to ensure water vulnerability is minimised.
The Mens SAC	Housing development.	Disrupted flight paths and feeding areas for bat populations present within sites.	Policy 25 and 31 –specific requirements that any development does not affect integrity of these sites and identifies a bat sustenance zone.

2.13 Although it was concluded that with mitigation the HDPF would not have any impact on international sites, it was also highlighted that, given that the precise number and location of development to be brought forward through Neighbourhood Development Plans had not been finalised, there was therefore some potential for sites identified in NDPs to have additional impacts on the European sites that could not be identified as part of the higher level assessment undertaken for the HDPF. In particular, it was noted that the Parishes of Pulborough, West Chiltington, Thakeham, Storrington and Sullington, which are located in close proximity to the Arun Valley SAC/SPA/Ramsar site and/or water courses which flow into the site, are likely to require especially close examination if any significant proposal was to arise through the Neighbourhood Plan process.

3.0 Neighbourhood Development Planning in Horsham District

3.1 Horsham District now has over 80% coverage of Parishes or Neighbourhoods across the District progressing Neighbourhood Development Plans (NDP's). In total there are 23 Neighbourhood Plan areas across the District, some of which are clustered. Five Neighbourhood Plans (Nuthurst, Thakeham, Woodmancote, Slinfold and the Wineham and Shermanbury neighbourhood plans have been "made" and the remainder are at various stages of preparation. These NDP areas were subject to a Habitats Regulation Assessment Screening during their plan preparation, and it was concluded that their plans would not have any adverse impacts on any international site. The remaining designated parishes have not yet been subject to screening. Each neighbourhood development plan will be examined on its own merits (in combination with any other plans or development) as set out in part two of this report.

3.2 All neighbourhood Development Plans that are prepared must be in general conformity with the Council's Local Plan. Where a NDP is silent on an issue, the policies in a Council's Local Plan (in this case the HDPF) apply. As stated in paragraph 2.3, the Neighbourhood Development plans that have been prepared to date have been written to be in conformity with both the HDPF.

3.3 In screening the emerging NDPs the following issues will be considered:

1. Do any of the proposed policies increase quantum of development beyond 1500 homes which are due to be delivered through Neighbourhood Planning? If this is the case, are there additional impacts arising from additional sites not assessed in the Appropriate Assessment of the HDPF?
2. Will the development locations on the plan have any direct or indirect impacts on the Arun Valley SAC/SPA/RAMSAR or the Mens SAC or the Ashdown Forest SAC that cannot be avoided by the application of the policies in the HDPF?
3. Are there any additional policies within the plan which could impact alter the mitigation measures set out in the Council's HDPF?
4. Do any of the above apply in combination with other plans or programmes?

PART TWO – SCREENING ASSESSMENTS FOR NDPs in HORSHAM DISTRICT

Table 4 below sets out a summary of the screening assessments undertaken for NDPs in Horsham District, and the date that this assessment was undertaken. The detailed assessments are set out on the following pages.

NDP Area	Plan Status	HRA Screening Outcome	Date of screening
Ashington Parish	Progressing to reg 14 consultation	Awaiting Screening	
Ashurst Parish	Not designated	N/A	
Billingshurst Parish	Progressing to reg 14 consultation	Awaiting Screening	
Bramber Parish	Progressing to reg 14 consultation	Awaiting Screening	
Broadbridge Heath	Not designated	N/A	
Colgate	Not designated	N/A	
Cowfold	Progressing to reg 14 consultation	Appropriate Assessment not required	January 2020
Henfield Parish	Progressing to reg 14 consultation	Awaiting Screening	
Horsham Blueprint	Progressing to reg 14 consultation	Awaiting Screening	
Itchingfield Parish	Progressing to reg 14 consultation	Awaiting Screening	
Lower Beeding	Progressing to reg 14 consultation	Awaiting Screening	
North Horsham	Withdrawn from NP	n/a	
Nuthurst Parish	Plan Made October 2015. Land identified for max 51 homes	Appropriate Assessment not required	May 2014
Pulborough Parish	Awaiting Screening	Preliminary screening November 2015. Update necessary to take account of more recent plans which have now been made.	
Rudgwick	Progressing to reg 14 consultation	Appropriate Assessment not required	January 2020
Rusper	Progressing to reg 14 consultation	Awaiting Screening	
Shermanbury Parish	Plan made June 2017. Land allocated for max 20 homes	Appropriate Assessment not required	August 2016
Shipleigh Parish	Progressing to reg 14 consultation	Awaiting Screening	
Slinfold Parish	Examination complete - Proposal for up to 74 homes	Appropriate Assessment not required following updated screening– see below	1) June 2017 2) February 2018 (update)
Southwater Parish	Regulation 14 consultation completed.	Appropriate Assessment not required	Jan 2019

NDP Area	Plan Status	HRA Screening Outcome	Date of screening
Steyning,	Designated	Appropriate Assessment not required N/A	
Storrington Sullington and Washington	Examination concluded. Examiner has requested rescreening following additional allocation of land for residential development.	Appropriate Assessment not required following updated screening	February 2018 Updated Screening December 2018
Thakeham	Plan made April 2017 – Land allocated for 50 homes	Appropriate Assessment not required	October 2015
Upper Beeding Parish	Progressing to Reg 16 consultation	Appropriate Assessment not required following screening.	Dec 2018
Warnham Parish	Examination Nov 18	Appropriate Assessment not required following screening.	Nov 2018
West Chiltington Parish	Regulation 14 consultation ongoing	Awaiting Screening	
West Grinstead Parish	Progressing to reg 14 consultation	Awaiting Screening	
Woodmancote Parish	Plan to be made June 2017. No land allocated for housing development.	Appropriate Assessment not required	January 2016

Cowfold Neighbourhood Plan

1. Do any of the proposed policies increase quantum of development beyond 1500 homes? If this is the case, then what are the additional impacts of additional numbers not assessed in the Appropriate Assessment of the HDPF?

This NDP will identifies land for approximately 70 homes. Cumulatively, the following 'made' neighbourhood plans: Slinfold, Nuthurst, Thakeham, Wineham and Shermanbury, Warnham, Storrington/Washington and Woodmancote allocate land for 394 homes. In addition, Upper Beeding has undergone an HRA screening with the plan identifying land for 109 and scheduled to go to referendum in 19 March 2020. Furthermore, Southwater and Henfield Neighbourhood Plan are coming up to examination in the next month and they are proposing 450 and 260 dwellings respectively. Southwater and Henfield have undertaken an HRA screening and it was found no Appropriate Assessment was required. Nevertheless, the overall the total number of dwellings have been identified to be delivered through neighbourhood planning at the end of Jan 2020 having reached Regulation 16 equates to a total of approximately 1508 homes. The overall quantum of development exceeds what was assessed in the HRA of the HDPF by 8 dwellings. It is the consideration of officers that this is within acceptable tolerances with the HDPF advocating '*at least*' 1,500 to come from neighbourhood plans. The additional 8 dwellings it is envisage will not have significant impact on the international sites directly or cumulatively, but it is acknowledged subsequent neighbourhood plans will have to have due regard to this issue and assessed accordingly. The potential impact of the additional homes in HDC including in Cowfold Parish is set out in more detail in response to question 4, as any impacts will be in combination with other plans and programmes.

2. Will the development locations on the plan have any direct or indirect impacts on the Arun Valley SAC/SPA/RAMSAR, the Mens SAC or the Ashdown Forest SAC that cannot be avoided by the application of the policies in the HDPF?

The development sites identified in this plan are not within the Arun Valley or the Mens Woodland. The river Arun and some of its tributaries flow through the Parish, but there are no sites that have been identified for development which are on or near these watercourses. It is therefore considered that there are no additional impacts arising from this development that would not have been identified and mitigated by the policies in the Horsham District Planning Framework. If the Neighbourhood Plan is 'made' the HDPF policies will still be relevant as part of any planning application and ensures there is no adverse impact on this European site.

There are no additional impacts arising from the Neighbourhood Plan that would not be covered by the existing policy framework. It is not considered that the sites are sufficiently close to the Arun Valley SPA to have any additional direct or direct impacts on these sites. If the Cowfold Neighbourhood Plan is made, the development sites will also need to accord with the provisions of the HDPF policies, which avoids any adverse impact on the two European sites.

In terms of the Ashdown Forest SAC there are policies in the HDPF which seek to minimise air quality impacts and encourage sustainable transport solutions. This cannot however

entirely rule out the potential that new development in Cowfold area could generate additional car journeys which may include trips through the Ashdown Forest and therefore contribute to nitrogen deposition in this area. The more detailed assessment of this is set out in response to question 4 as any impact that arose would be in combination with a range of other plans and programmes.

3. Are there any additional policies within the plan which could impact alter the mitigation measures set out in the Council's HDPF?

This plan does not propose any policies which conflict with the requirements of the HDPF policies as set out in Table 3.

4. Do any of the above apply in combination with other plans or programmes?

- a) Question 1 considers the total level of development in combination with all neighbourhood development plans that have reached Regulation 16 stage consultation in Horsham District. In addition Local and Neighbourhood Plans are being prepared in adjoining authorities. The cumulative impact of these plans was considered as part of the HRA which was undertaken for the Horsham District Planning Framework. The total number of homes identified for each District includes homes which will or have been delivered through Neighbourhood Planning. It is acknowledged Cowfold is providing 70 dwellings as part of the at least 1,500 dwellings to come from Neighbourhood Plans.
- b) Cowfold Parish is located on the eastern half of Horsham District and adjoins Lower Beeding, West Grinstead Parish, Nuthurst Parish and Shermanbury. Only Nuthurst has a made neighbourhood plan with the plan allocating a modest 51 units while Shermanbury is allocating 20 dwellings. The others have yet to reach Regulation 16 stage.
- c) It has been recognised that development in Cowfold Parish, could in combination with other development have an adverse impact on the Ashdown Forest as a result of increased vehicle movements through the area. An initial screening has therefore been undertaken to consider whether there is a chance that development in the parish could (in combination with other development) have an impact on the integrity of the Ashdown Forest SAC.
- d) The potential air quality impacts on the Ashdown Forest SAC arise from additional nitrogen deposition resulting from increased traffic emissions as a consequence of new development. Major roads which pass through Ashdown Forest and on which there is the potential that residents from Cowfold Parish could potentially use are the A22, A26 and A275, B2188, B2026, B2110 and Coleman's Hatch Road. If none of the roads in the network experience an increase in traffic as a result then the air pollution impact of the scheme is considered not to be significant and no further work is needed.
- e) In March 2017, the High Court handed down a judgment in relation to nitrogen deposition on the Ashdown Forest SAC. Wealden District Council brought a legal challenge against the Joint Core Strategy prepared by Lewes District Council and the South Downs National Park Authority. The legal challenge centred on the assessment of air quality impact on the Ashdown Forest SAC which was based on advice provided by Natural England. The Wealden judgment found that the advice provided by Natural England on the in combination assessment was flawed and the outcome was that the judge quashed part of the Joint Core Strategy.

- f) Natural England had advised that the Design Manual for Roads and Bridges could be used to assess air quality impacts, applying the 1,000 Annual Average Daily Traffic methodology. It was advised that if the development proposals in a Plan by itself were calculated to be below 1,000 AADT, then the air pollution impacts could be considered not significant and no further work would be needed.
- g) The judge found that the advice provided by Natural England was erroneous and that an assessment of air quality impact should include other development proposals thus considering the in combination effect of nitrogen deposition from increased traffic. However, the judge gave no ruling as to the practical effects of the judgment. The parameters for any assessment of traffic impact are now unclear beyond a general presumption that any development that is likely to lead to air quality impacts on the Ashdown Forest SAC in the form of additional traffic will need to be considered through a Habitats Regulations Assessment.
- h) The starting point for establishing whether there are likely to be any impacts from the Cowfold Neighbourhood Plan has been to consider existing travel patterns which are known for these parishes. The Council has therefore used the travel to work patterns from the 2011 census as this is readily available data that exists at a Parish level that would provide an understanding of travel movements.
- i) The travel to work data shows the total number of journeys to work from each parish, together with the district or borough in which the journey ended. Commuting patterns are likely to be a worst case scenario as other trips made to access services and facilities are much shorter. The number of trips set out below does not make a breakdown of whether they were made by public transport or vehicle. However, it is likely that trips to Wealden District would be by car given the lack of any direct public transport route.
- j) The table below shows the number of journeys to work in 2011 and a summary of whether they were within or beyond Horsham District. This is broken down further to provide the percentage and number of trips which were made to a destination in Wealden.

Trips from Horsham District Council as a whole

Destination of trip	Number of journeys	Percentage of total journeys
All trips	50349	100%
Horsham District	24413	48%
Outside Horsham District	25936	52%
Wealden District	154	0.3%

Trips from Cowfold Parish

Destination of trip	Number of journeys	Percentage of total journeys
All trips	1011	100.0%
Horsham District	402	39.8%
Outside Horsham District	609	60.2%
Wealden District	7	0.7%

- k) This table shows that there were 7 journeys to Wealden district from Cowfold Parish at the time of the 2011 census (0.7% of the total). Given that the parish is around 30km away the number of trips would be expected to be extremely low, and this helps confirm that there is little if any relationship to the parish with Wealden District. It is however recognised that additional development will generate additional car journeys from the village and it needs to be considered whether any could extend into Wealden and therefore risk impacting Ashdown Forest.
- l) There are 70 homes proposed in the Cowfold Neighbourhood Plan which may have the potential to further increase the population size of the parish. Using the average household size for Horsham District of 2.39 people, the increase in population resulting from this development will be around 167 individuals. It is not expected that all new residents will be economically active – some will be children, and others retired, and as a result these individuals will not be undertaking commuting journeys. At the 2011 census 55.2% of residents were aged 16-65 and most likely to be economically active. This equates to around 92 residents.
- m) Using these figures, 0.7% of 92 trips equates to less than one additional car journey to Wealden District. This is however trips to the district and are not necessarily trips through Ashdown Forest which is some distance from the main employment locations of Uckfield and Hailsham, both of which are more likely to be employment destinations for residents of the Cowfold area. The total number of trips is therefore likely to be lower than this figure. It is therefore not considered that these development proposals will generate any journeys that either individually or cumulatively with other trips will increase traffic movements above 1000 AADT.

Conclusion

On the basis of the above it is not considered that an Appropriate Assessment of the Cowfold Neighbourhood Plan is required. Nevertheless, it is acknowledged this plan promotes 70 dwellings which cumulatively exceeds the quantum of development beyond the 1,500 homes to be delivered by Neighbourhood Plans by 8 dwellings. It is the consideration of officers the sites promoted within the Cowfold NP do not impact directly on the international sites and there are appropriate mechanisms in place to negate any impact derived from development. It may however be helpful for the Parish Council cross refer to the relevant HDPF policies to further strengthen the mitigation for the Arun Valley SPA and the Mens Woodland SPA.

It is also suggested that a further modification is made to the plan to ensure that any future development proposals area make a reconsideration as to whether the proposal may impact on the Ashdown Forest as follows:

“Any development with the potential to impact, either individually or in combination, the integrity of any SPA or SAC will be required to undertake a Habitat Regulations Assessment including an Appropriate Assessment if required”