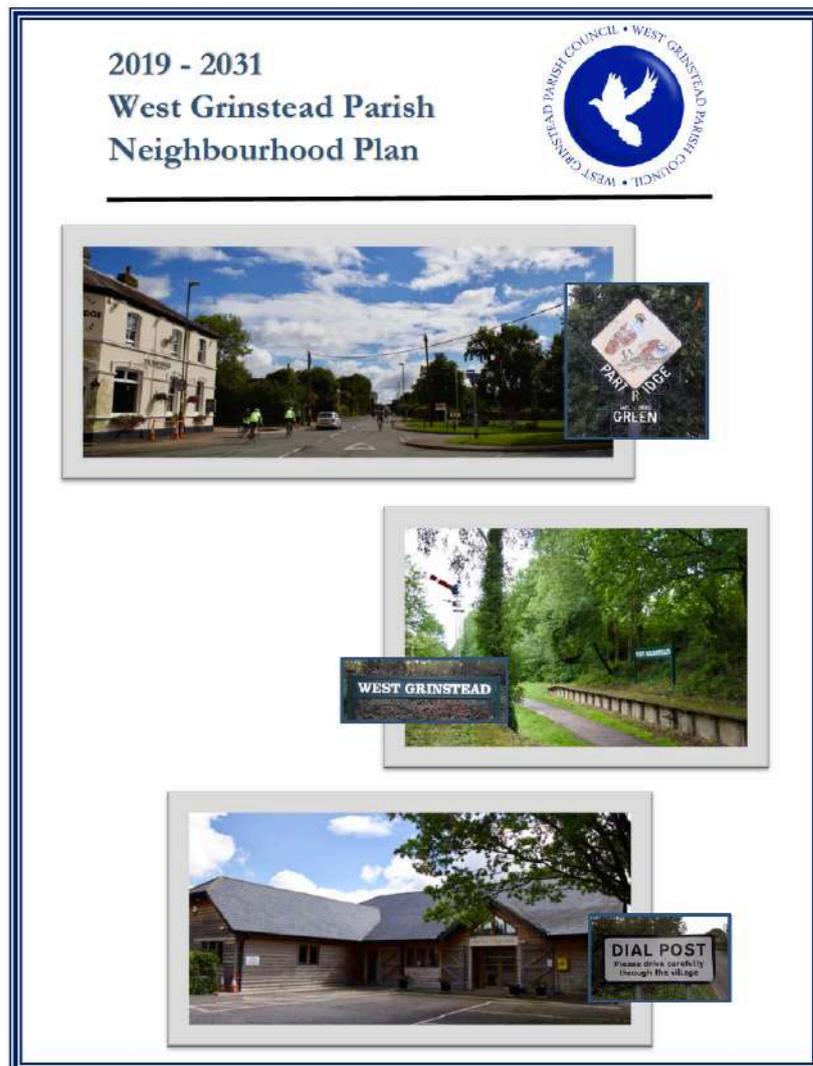


Consultation Statement

West Grinstead Neighbourhood



March 2020

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Version: 1.5 for Submission to HDC

Date: 24 March 2020

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1. INTRODUCTION

- 1.1. This Consultation Statement has been prepared by DOWSETTMAYHEW Planning Partnership for, and on behalf of, West Grinstead Parish Council (WGPC). It is in support of the preparation of the West Grinstead Neighbourhood Plan (WGNP).
- 1.2. This Statement contains a chronology of the stakeholder engagement that has taken place as part of the preparation of the WGNP, the main issues that have emerged through this process, and how they have been addressed. It sets out how preparation of the WGNP accords with the Neighbourhood Planning (General) Regulations 2012.
- 1.3. This Statement sets out a summary of the Legislative Background (Section 2); The Background to the WGNP (Section 3); A Chronology of the Consultation Process 2016-2019 (Section 4); The Main Issues Arising from Engagement (Section 5); Pre-submission WGNP & SA (Section 6); The Main Issues Arising Through Consultation on the Pre-submission Neighbourhood Plan (Regulation 14) (Section 7); How the Main Issues Have Been Considered (Section 8); Preparation of Submission Documents (Section 9); and a Summary is provided at Section 10.
- 1.4. This Statement illustrates the level of public engagement undertaken at every stage of the process and how stakeholder consultation has been key to, and positively shaped, the WGNP and its preparation.

2. LEGISLATIVE BACKGROUND

- 2.1. The requirement for a Consultation Statement to accompany the Submission Version (Regulation 16) WGNP is set out in the Neighbourhood Planning (General) Regulations 2012.
- 2.2. Regulation 15(1) states that *“Where a qualifying body submits a plan proposal to the Local Planning Authority, it must include...”* amongst other things 15(1)(b) *‘a Consultation Statement.’*
- 2.3. Regulation 15(2) states that a Consultation Statement means a document which:

- (a) *“contains details of the people and bodies consulted about the proposed neighbourhood Development Plan;*
- (b) *explains how they were consulted;*
- (c) *summarises the main issues and concerns raised by those consulted; and*
- (d) *describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood Development Plan.”*

- 2.4. This Statement includes a summary of the consultation exercise as part of the preparation of the WGNP, undertaken in accordance with Regulation 14 of the Neighbourhood Plan (General) Planning Regulations 2012.

2.5. Before submitting a Plan proposal to the Local Planning Authority, a qualifying body must:

- (a) publicise, in a manner that is likely to bring to the attention of people who live, work or carry on a business in the neighbourhood area -
 - (i) details of the proposals for a neighbourhood Development Plan;*
 - (ii) details of where and when the proposals for a neighbourhood Development Plan may be inspected;*
 - (iii) details of how to make representations; and*
 - (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;**
- (b) consult any consultation body referred to in Paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for neighbourhood Development Plan;*
- (c) send a copy of the proposals for a neighbourhood Development Plan to the Local Planning Authority.”*

2.6. The preparation of the WGNP has been undertaken in accordance with these regulatory requirements.

3. BACKGROUND TO THE WEST GRINSTEAD NEIGHBOURHOOD PLAN

- 3.1. WGPC resolved to prepare a Neighbourhood Plan in 2013. An application was submitted in August 2013 to designate the area for neighbourhood planning purposes. Horsham District Council (HDC) subsequently approved the designation of the Neighbourhood Plan Area in November 2013.
- 3.2. A Neighbourhood Plan Working Group (NPWG) was formed in July 2013 to progress the preparation of the WGNP on behalf of WGPC.
- 3.3. It was recognised that key to a successful WGNP would be the support of local residents and other stakeholders. Intrinsic to securing such support would be to ensure engagement with these stakeholders throughout the Plan preparation process. It was agreed the preparation of the WGNP would be undertaken in a transparent and inclusive manner.
- 3.4. Throughout the Plan preparation process, the NPWG have sought to ensure that local residents, their representatives, local businesses, interest groups and wider interested parties, including statutory and regulatory bodies, have been actively consulted and their views sought.
- 3.5. A dedicated webpage has been established with updates regularly provided online on the WGPC website.
- 3.6. The overarching principles of the stakeholder engagement process has been to engage in a manner that is extensive, effective, inclusive, fair, transparent and proportionate.

4. CHRONOLOGY OF CONSULTATION PROCESS: 2014 - 2019

- 4.1. This section provides a chronological overview of the consultation stages undertaken as part of the production of the WGNP.

Dedicated Webpage

- 4.2. A dedicated webpage was established online. This provided an online mechanism to keep stakeholders up-to-date on Plan preparation, public events, and raise awareness of the preparation of the WGNP.
- 4.3. In addition, the Parish Newsletter was used regularly to, amongst other matters, update residents on Plan preparation and progress; provide updates on the 'Call for Sites'; public meetings; and exhibitions.

Questionnaire: March 2014

- 4.4. The Questionnaire was distributed to all 1,400 households in March 2014.
- 4.5. Residents were given four weeks to complete the Questionnaire and were asked to their views regarding the issues relevant to creating a Neighbourhood Plan for the parish.

- 4.6. The Questionnaire was divided into five main sections: Housing, Business/Employment, Leisure, Transport and General, with each section containing a number of questions.
- 4.7. A total of 129 replies were received. The feedback can be summarised as:
- 4.8. **Housing:** Feedback indicated a preference for large one/two/three bedroom properties, mainly owner-occupied, but also reflected the need for low-cost starter homes for local people either rented or privately owned.
- 4.9. Respondents stated that the amount of houses built over the past ten years was about right, but some expressed concern regarding the lack of availability of affordable homes.
- 4.10. The main reasons for leaving the village were either to set up home independently or with a partner, while availability of suitable housing to rent or buy was less of an issue.
- 4.11. **Business/Employment:** The survey confirmed a small percentage of people worked locally. More than two-thirds professed a desire to see more work opportunities locally, while over a third felt they would work from home given a high-speed internet connection.
- 4.12. Amongst preferences for the types of new businesses thought beneficial were: a larger general store; a farm or local produce shop; a chemist/pharmacy; and differing sorts of light industry.
- 4.13. **Leisure:** Approximately two-thirds of respondents stated they were satisfied with existing sports and leisure facilities. However eighty-one people considered there was a need for a new community centre. Votes were split evenly between a village hall, an indoor sports facility and a youth club, with forty-one returns voting for all three. A number of general comments also supported the view that an updated village hall, plus new sports and youth outlets for Partridge Green would be a valuable asset.
- 4.14. **Transport:** Feedback confirmed few people experienced transport problems in either getting around or out of the parish. Most parishioners were also generally happy or satisfied with the location of bus-stops and the bus companies' provisions for disabled or child access.
- 4.15. Two-thirds of returns stated they felt there was adequate car-parking within the parish, while about half of people wanted there to be more parking slots for cyclists.
- 4.16. A number of responses brought attention to the problem of congestion in the High Street, but it was also pointed out that quite frequently motorists did not make use of the parking spaces in the village hall car park.
- 4.17. **General:** Feedback confirmed the variety of shops in the High Street was an important benefit, frequently made use of by the majority of parishioners. Feedback indicated that shops, particularly the Co-op, were typically used on a small-scale, mostly for last-minute items or to save travelling time. Nevertheless, people enjoyed being able to support local businesses and the community spirit it engendered.
- 4.18. Details relating to the Questionnaire are available to view at Appendix 1.

Business Questionnaire: September 2014

- 4.19. Local businesses were contacted to: inform business owners of the preparation of the WGNP; to confirm contact details; and to seek comments.
- 4.20. Business owners were invited to meet with the Working Group to discuss matters in more detail.
- 4.21. Business were asked to provide a response by 31st October 2014.
- 4.22. A total of 25 responses were received. Responses confirmed:
- Business location;
 - How long the business has been based in the parish;
 - Operating sector of business;
 - Staff numbers; where staff live; and how staff travel to work;
 - Future aspirations;
 - Road networks; and
 - Broadband matters.
- 4.23. Details relating to the Questionnaire are available to view at Appendix 2.

Scoping Report: November 2014

- 4.24. The Scoping Report for the Sustainability Appraisal (SA) to accompany the WGNP was the subject of formal consultation with the statutory bodies in November 2014.
- 4.25. Feedback was received from Natural England and the Environment Agency in accordance with the regulatory timetable. No response was received from Historic England.
- 4.26. Details relating to the Scoping Report are available to view at Appendix 3.

Call for Sites: December 2014

- 4.27. A 'Call for Sites' was undertaken in December 2014.
- 4.28. A notice was placed in the Parish Newsletter. Stakeholders were invited to submit developable site(s) which could provide residential units over the next 15 years. Commercial sites were also welcomed.
- 4.29. Details relating to the 'Call for Sites' is available to view at Appendix 4.

Public Exhibition: December 2014

- 4.30. A Public Exhibition was held on Friday 5th December 2014 from 2pm - 6pm in the Methodist Hall and Saturday 6th December 2014 from 9am - 12pm.

- 4.31. The event was held to share the latest information regarding the preparation of the WGNP as well as a summary of the local survey results.
- 4.32. Details relating to the Public Exhibition is available to view at Appendix 5.

Consultation Event: May 2015

- 4.33. A Consultation Event was held on Saturday 16th May 2015 from 10am - 1pm in Partridge Green Village Hall and from 2.30pm - 5.30pm in Dial Post Village Hall.
- 4.34. Attendees were asked for their feedback and to identify their preferences sites. Sites exhibited were:

- P1: Huffwood Trading Estate;
- P2: Land north of the Rosary;
- P3: Land north of the Rise;
- P4: Land off Star Road (Brightstone site);
- P5: Ash Wood and South of Star Road;
- P6: Dunstands Farm and Surrounding Land;
- P7: Dunstands - Field Behind;
- P8: Corner of B2135 & Mill Lane;
- P9: Site Opposite Windmill Pub, Littleworth Lane (St Hugh's Land).

- D1: Between DP village & A24;
- D2: Site West of DP village – Knepp Estate;
- D3: Site West of DP village – Ms Mills' land;
- D4: Oaklands site, next to Old Barn Nurseries;
- D5: Site of old Blaker Works, DP.

- 4.35. Feedback confirmed the following sites in Partridge Green were most popular:

- Huffwood (P1);
- Land off Star Road (P4);
- Ashwood (P5).

- 4.36. Feedback confirmed the following sites in Dial Post were most popular:

- Oaklands (D4);
- Blakers (D5).

- 4.37. Feedback confirmed the following sites were the least popular:

- Land north of the Rosary (P2);
- Land north of the Rise (P3);
- The corner of Mill Lane and the B2135 (8).

4.38. The feedback confirmed a preference for Brownfield sites over Greenfield sites.

4.39. Details relating to the Public Exhibition is available to view at Appendix 6.

Public Exhibition: September 2015

4.40. A Public Exhibition was held on Friday 25th September 2015 at 7pm in Partridge Green Village Hall. A Public Exhibition was also held on Saturday 26th September 2015 from 10am - 1pm in Dial Post Village Hall.

4.41. Developers/landowners were invited to give a short presentation on their proposal and answer questions from attendees.

4.42. The Partridge Green sites comprised:

- Land north of the Rosary;
- Land north of the Rise;
- Ash Wood and South of Star Road;
- Dunstands Farm and Surrounding Land;
- Dunstands - Field Behind;
- Corner of B2135 & Mill Lane.

4.43. The Dial Post sites comprised:

- Site in Knepp Estate;
- Site West of DP village – Ms Mills land;
- Oaklands site, next to Old Barn Nurseries;
- Site of old Blaker Works.

4.44. Attendees were asked for their feedback and to identify their preferred sites.

4.45. Details of the Public Exhibition are available to view at Appendix 7.

Business Questionnaire: October 2015

4.46. Local businesses were contacted again to inform business owners of the preparation of the WGNP; to confirm contact details; and to seek comments.

4.47. A total of 25 response were received. Responses confirmed:

- Business location;
- How long the business has been based in the parish;

- Operating sector of business;
- Staff numbers; where staff live; and how staff travel to work;
- Future aspirations;
- Road networks; and
- Broadband matters.

4.48. Details relating to the Questionnaire are available to view at Appendix 8.

Meeting with Horsham District Council: November 2015

4.49. A meeting was held with Members of the NPWG and HDC Officers on 11th November 2015.

4.50. The purpose of the meeting was to inform HDC of the NPWG's vision for the southern area of Partridge Green and to advise the Huffwood industrial estate owner had expressed a wish to move forward a residential proposal on the site.

4.51. The meeting also highlighted the vision for the northern area boarding Star Road to facilitate housing with the southern area below Star Road to be put forward for commercial use.

4.52. Details of the meeting are available to view at Appendix 9.

Estimation of Future Housing Needs in West Grinstead: February 2016

4.53. A Background Housing Paper was prepared by the NPWG to calculate the housing needs of the parish.

4.54. A range of methodologies based on: household formation; demographic changes; and economic changes; affordable housing needs survey; and the Horsham District Planning Framework, provided a range of 0 - 284 new homes to be provided.

4.55. Details of the report are available to view at Appendix 10.

Justification of Housing Needs: February 2016

4.56. An additional paper was prepared by the NPWG to provide a justification for the range of housing which the NPWG wished to allocated.

4.57. The Paper set out a summary of the methodologies. It confirms it was agreed Methodology C (based on the HDPF and the neighbourhood planning allocation of 'at least 1,500' to be allocated in Neighbourhood Plans up to 2031) was the favoured methodology. This methodology resulted in 30 - 71 units to be allocated in the WGNP.

4.58. The Paper confirmed the NPWG have agreed to plan positively and facilitate the delivery of 60 - 70 homes through site allocation and windfall development.

4.59. Details of the report are available to view at Appendix 11.

Meeting with Horsham District Council: November 2016

4.60. A meeting was held with Member of NPWG and HDC Officers on 24th November 2016.

4.61. The meeting provided an opportunity to update HDC on progress made to date which comprised: Call for Sites; Site Assessment work; public consultation; Scoping Report; and the preparation of the Background Housing Papers.

4.62. Details of the meeting are available to view at Appendix 12.

Local Gap Paper: February 2017

4.63. A Local Gap Background Paper was prepared in 2017. It set out the supporting evidence and justification to support the inclusion of a Local Gap Policy.

4.64. The Paper defined the areas which are considered important locally and provides a justification for these areas to be kept free from development in the long term.

4.65. Details of the Paper are available to view at Appendix 13.

Local Green Space Paper: February 2017

4.66. A Local Green Space (LGS) Background Paper was prepared in February 2017. The Paper sets out and demonstrates how the identified areas (Meyers Wood; East and West of St Georges Road; and Dial Post Green) meet the requirements of the NPPF.

4.67. The Paper defined the areas which are considered important locally and provides a justification for these areas to be kept free from development in the long term.

4.68. Details of the Paper are available to view at Appendix 14.

Horsham District Council Officer attendance at NPWG Meeting to discuss Background Papers: July 2017

4.69. HDC's Neighbourhood Planning Officer attended a NPWG meeting to discuss the draft background documents and provide feedback.

4.70. Matters discussed at the meeting comprised: Local Gaps; Huffwood/Star Road proposal; Housing Need; requirements of an Examiner; and review mechanisms.

4.71. Details of the meeting are available to view at Appendix 15.

Meeting with HDC and Landowners of Huffwood and Star Road: November 2017

4.72. A meeting was held with Members of the NPWG, HDC officers and the landowners of Huffwood Estate and Star Road in November 2017.

- 4.73. The meeting provided an opportunity to: provide an update on the Neighbourhood Plan; Economic Development, including availability of Huffwood for residential and the potential relocation of the economic uses to Land South of Star Road.
- 4.74. In addition, the meeting provided an opportunity to provide an indication of the timescales for the Examination of the WGNP, delivery mechanism/funding opportunities were also discussed.
- 4.75. Details of the meeting are available to view at Appendix 16.

Meeting with HDC Economic Development Officers and Landowners of Huffwood and Star Road: March 2018

- 4.76. A meeting was held with Members of the NPWG, HDC Economic Development officers and the landowners of Huffwood Estate and Star Road in March 2018.
- 4.77. The meeting provided an opportunity to: provide an update on the Neighbourhood Plan; and discuss financial matters with regard to the arrangement between landowners.
- 4.78. Details of the meeting are available to view at Appendix 17.

Health Check: July 2018

- 4.79. The draft WGNP and draft Sustainability Appraisal (SA) was submitted to HDC for a 'health check'. Comments were received on the draft documents in July 2018.
- 4.80. Details of HDC's comments are available to view at Appendix 18.

Memorandum of Understanding

- 4.81. A Memorandum of Understanding (MoU) was agreed and signed between landowners in October 2018. This set out the basis of understanding between the parties in relation to their respective land holdings.
- 4.82. It confirms the landowners support for the inclusion/allocation of both parcels of land within the WGNP to enable the development of Huffwood Trading Estate for residential development and Land South of Star Road for commercial development.
- 4.83. In addition, it sets out a commitment to advance negotiations in good faith and with all due expedition.
- 4.84. Details of the MoU are available to view at Appendix 19.

Indicative Housing Requirement: October 2018

- 4.85. In light of changes to national planning policy an indicative housing requirement was requested and provided by HDC in October 2018.
- 4.86. Details of the report are available to view at Appendix 20.

Ongoing Liaison with HDC in respect of Indicative Housing Requirement: December 2018 - March 2019

- 4.87. Following receipt of the Indicative Housing Requirement, the WGNP liaised with HDC on the options considered to be most appropriate for progressing with the WGNP.
- 4.88. Options discussed and explored with HDC comprised:
- 1) Go forward with a proposal to facilitate 60-70 residential units in the WGNP. Include a proposal for an early review in 2021 when HDC's current review of the HDPF is likely to be adopted and therefore the numbers to be allocated to Parishes finalised.
 - 2) Use the indicative number of 110 dwellings and allocate a further site (in addition to Huffwood Trading Estate).
 - 3) Move forward to Regulation 14 Pre-submission WGNP without proposing site(s) for residential development and allow HDC to bring forward site allocations in the HDC Local Plan.
 - 4) Move forward to Regulation 14 Pre-submission consultation with a Plan which does not allocate sites but which has a strategy policy for residential sites and site allocations which would be incorporated into the Plan in 2021.
- 4.89. Details of correspondence are available to view at Appendix 21.

Meeting with HDC: April 2019

- 4.90. A meeting was held with Members of the NPWG and HDC Officers on 1st April 2019 to discuss the preferred options of the NPWG.
- 4.91. Following discussion it was agreed Option 4 would be pursued. In pursuing this option, HDC advised the WGPC would be expected to commit to a review of the WGNP following the adoption of the new Local Plan, which is anticipated in 2021.
- 4.92. In light of discussions, it was agreed the WGNP should proceed without site allocation(s) and instead set out a 'Community Aim' to encourage the commercial land uses at Huffwood to relocate to Land South of Star Road in order to facilitate residential development at the site. The Regulation 14 Pre-submission WGNP was prepared on this basis.
- 4.93. Details of the meeting are available to view at Appendix 22.

WGNP Agreed Position: May 2019

- 4.94. Correspondence sent to HDC in May 2019 confirm the agreed position of the WGNP.
- 4.95. Details of correspondence is available to view at Appendix 23.

5. MAIN ISSUES ARISING FROM ENGAGEMENT

- 5.1. The extensive stakeholder engagement helped inform the key issues addressed in the WGNP and the policies that flow from the Vision and Objectives.
- 5.2. The main issues that arose during the stakeholder engagement exercise, in the lead up to the preparation of the Pre-submission WGNP and its subsequent statutory consultation, can be summarised as:

- Preserving the rural character of the Parish and Protection of Greenfield Sites;
- Preventing coalescence between Partridge Green, Jolesfield and Littleworth;
- Retaining and supporting local businesses; and
- Congestion and Parking.

- 5.3. How these issues were addressed within the initial Pre-submission WGNP is set out below.

Preserving the Rural Character of the Parish and Protection of Greenfield Sites

- 5.4. West Grinstead Parish is a predominantly rural parish in the south of the district and benefits from a rich and varied environment. There are numerous pockets of defined Ancient and Semi-Natural Woodland within the parish.
- 5.5. Public consultation events have highlighted a local desire to protect the valued rural nature of the parish and to protect Greenfield sites. In addition, feedback has confirmed a preference for Brownfield development.
- 5.6. In light of feedback received, the following Strategic Objective is included in the WGNP:
- “Promote a variety (size and type) of suitable housing that reflects the needs of the parish, whilst seeking to protect, enhance and sustain the rural character of the parish and its environment.*
- Maintain the separate identities of the settlements of Partridge Green, Littleworth, Jolesfield, West Grinstead and Dial Post within the parish.”*
- 5.7. Furthermore, the WGNP includes: Policy 1: Retention of Local Gaps; Policy 2: Open Space; Policy 3: Local Green Space; Policy 4: Green Infrastructure: Existing Trees, Hedgerows, Habitats and Wildlife.

Preventing Coalescence between Partridge Green, Jolesfield and Littleworth

- 5.8. The parish lies within the Cowfold and Shermanbury Farmlands.¹ This is an area which includes gently undulating areas of low ridges and valleys over the Weald Clay and the southern edge of the Tunbridge Wells sands.
- 5.9. Public consultation events highlighted the desire to protect areas of open land between the settlements of Partridge Green, Jolesfield and Littleworth. Feedback highlighted that it valued the rural character and sense of openness between the settlements and the built-up area of Partridge Green.
- 5.10. In light of feedback received, the following Strategic Objective is included in the WGNP:
- “Maintain the separate identities of the settlements of Partridge Green, Littleworth, Jolesfield, West Grinstead and Dial Post within the parish.”*
- 5.11. Furthermore, the WGNP includes Policy 1: Retention of Local Gaps.

Retaining and Supporting Local Business

- 5.12. The 2011 Census reveals that the number of residents of working age (16-74) was 2,305. Of this figure, 1,686 (73.15%) were economically active, with 619 (26.85%) economically inactive.
- 5.13. Whilst the parish is rural, it nonetheless benefits from two significant employment centres, both located within Partridge Green. These are the Huffwood Trading Estate, located on the south side of the High Street; and the Star Road Estate, which is located to the south of this and accessed off the B2135. These provide significant employment floorspace and job opportunities in a range of employment types.
- 5.14. The following Strategic Objective is included in the WGNP:
- “Support businesses that are sympathetic to and complement the rural character of the parish and its roads; and*
- Support rental of business premises, subject to the impact on traffic.”*
- 5.15. Furthermore, the WGNP includes: Aim 2: Land north and south of Star Road; Policy 7: Retail Premises; Policy 8: Employment; and Policy 9: Redundant Farm Buildings.

Congestion and Parking

- 5.16. The parish is widely accessible by road. The A272 crosses the northern part of the parish. The A24 runs in a north south direction and crosses the A272 in the northern part of the parish and provides a link to Dorking in the north and Worthing in the south.
- 5.17. Partridge Green is located at the intersection of the B2135, Partridge Green Road and the High Street. These routes can at times be subject to congestion. Public consultation events have

¹ Horsham District Council, Landscape Character Assessment 2003

highlighted local concern with existing parking problems and congestion on the High Street and by the Green in Oakwood, and there is a desire locally to improve parking facilities.

- 5.18. WGPC wish to support initiatives to provide additional parking. WGPC also wish to promote and publicise the Village Hall car park as an alternative area for those visiting Partridge Green.
- 5.19. The WGNP includes: Aim 3: Roads, Traffic and Congestions; and Aim 4: Congestion and Parking.

6. PRE-SUBMISSION WEST GRINSTEAD NEIGHBOURHOOD PLAN & SA

- 6.1. The Pre-submission WGNP (Regulation 14) and accompanying SA were formally published for consultation from 29th July 2019 - 23rd September 2019.
- 6.2. A limited number of hardcopies of the WGNP and SA were available from the Parish Council Office during the consultation period only. Summary copies could be printed as required.
- 6.3. Drop-in public events took place on 7th September 2019 in:
 - Partridge Green, Methodist Hall: 10am - midday; and
 - Dial Post Village Hall: 2pm - 4pm.
- 6.4. This provided attendees with the opportunity to discuss the consultation and ask question of the NPWG.

7. MAIN ISSUES ARISING THROUGH CONSULTATION ON THE PRE-SUBMISSION NEIGHBOURHOOD PLAN (REGULATION 14)

- 7.1. A total of 26 representations were received in response to the Regulation 14 Pre-submission consultation.
- 7.2. The comments are broken down as follows:

- **Developers/Landowners/Agents: 5**
- **Statutory Bodies: 9**
- **Residents: 12**

- 7.3. The main issues which have arisen through consultation are:

- **Aim 2: North and South of Star Road;**
- **Local Gap; and**
- **Local Green Space.**

Aim 2: North and South of Star Road

- 7.4. A number of representations were received from statutory bodies, and interested third parties, including landowners, developers, agents and members of the public in respect of Aim 2: North and South of Star Road.

- 7.5. Aim 2: North and South of Star seeks to confirm the Parish Council's support to relocate the existing commercial uses on Huffwood Trading Estate to new units on Land to the South of Star Road to enable the residential redevelopment of Huffwood subject to criteria.
- 7.6. Aim 2 sets out that the Parish Council believe that this will serve as a catalyst for old, redundant units on the Star Road Estate to also relocate to Land South of Star Road, thus freeing up the old redundant units for residential development.
- 7.7. Furthermore, Aim 2, sets out that the Parish Council believe this Aim offers the best way to provide much needed new housing and new quality business premises, whilst at the same time protecting the rural character of Partridge Green.
- 7.8. In response to the statutory Regulation 14 consultation, a number of comments have been received in respect of Aim 2: Land north and south of Star Road. In light of this, a background paper has been prepared to provide a response to representations received.
- 7.9. Details relating to the Background Paper are available to view at Appendix 24.

Policy 1: Retention of Local Gaps

- 7.10. Policy 1: Retention Local Gaps seeks to safeguard land between the settlements of Partridge Green, Jolesfield and Littleworth and land centred around Jolesfield Common. The extent of the Local Gaps are defined on the Proposals Map that comprises part of the WGNP. The objective of the designation is to prevent coalescence and retain the separate identity and amenity of settlements. The policy sets out circumstances where development within the Local Gaps will be supported.
- 7.11. In response to the statutory Regulation 14 consultation, a number of comments have been received from statutory bodies, and interested third parties in respect of Policy 1: Local Gap.
- 7.12. In light of this, and other, feedback the NPWG have reviewed the supporting background paper. This work has been undertaken in an effort to build upon the existing evidence base and provide further justification for the inclusion of Policy 1: Retention of Local Gaps; and to provide the NPWG's response to Regulation 14 Pre-submission representations.
- 7.13. No changes were proposed to Policy 1: Retention of Local Gaps; supporting text and/or the extent of the Local Gaps as a result of the review undertaken by the NPWG.
- 7.14. In addition, the NPWG commissioned a third party landscape review, by Lizard Landscape Design and Ecology. This was prepared following a review of Regulation 14 Pre-submission representations. The purpose of the review is to undertake a review of Policy 1: Retention of Local Gaps and to highlight where such a policy would add value to existing planning policies. The Review is supported by, amongst other matters, a Landscape Capacity Appraisal, including key viewpoints.
- 7.15. No changes were proposed to Policy 1: Retention of Local Gaps and supporting text. Land was identified for removal from the proposed Local Gaps.

- 7.16. Recommended changes were considered and agreed by the NPWG prior to the preparation of the Submission WGNP.
- 7.17. Details relating to the the NPWG Background Paper is available to view at Appendix 25.
- 7.18. Details relating to the the Lizard Landscape Report is available to view at Appendix 26.

Policy 3: Local Green Space

- 7.19. In response to the statutory Regulation 14 Pre-submission consultation, a small number of comments have been received from stakeholders on Policy 3: Local Green Space.
- 7.20. In light of this feedback the NPWG have reviewed the supporting background paper. This work has been undertaken in an effort to build upon the existing evidence base and provide further justification for the inclusion of Policy 3: Local Green Space; and to provide the NPWG's response to Regulation 14 Pre-submission representations.
- 7.21. Details relating to the Background Papers are available to view at Appendix 27.

Other Matters

- 7.22. Table 1 summarises all responses received (including the above) and for completeness is set out below.

TABLE 1

STAKEHOLDER FEEDBACK

POLICIES/AIMS/GENERAL		
Policy	Commenter No.	Summary of Comments
General		
	24 (SIGMA Planning Services)	<p>Rydon submit they are concerned by the heading to the comment sheet. It is considered restricting those who can have a voice in the NP substantially reduces its value and importance.</p> <p>It is submitted that comments that are relevant and justified need to be taken into account, irrespective of who makes them.</p> <p>Representations confirm the Plan's vision is supported, however it is considered the Strategic Objectives are too limited.</p>
	25 (Rural Planning Services for Knepp Castle)	<p>Representations confirm Knepp Castle Estate owns land around Dial Post village including Swallows Farm, Blakers Yard and New Barn Farm.</p> <p>Representations submit Knepp Castle Estate supports the NP.</p> <p>In respect of the Parish Profile: Representations recommend the Environment and Heritage section could include more information about the important work that the Knepp Castle Estate are carrying out ecologically through their pioneering and nationally important re-wilding project.</p> <p>It is submitted recognition could be given to the Knepp Castle Estate in the Plan.</p> <p>Given Knepp Castle is a Scheduled Ancient Monument it is submitted greater acknowledgement could be made of this within the Parish Profile.</p>
	14 - (Southern Water)	<p>Representations submit there are no policies to support the provision of new or improved infrastructure.</p> <p>It is noted the Parish Council is not the planning authority in relation to wastewater development proposals. Representations submit support for essential infrastructure is required at all levels of the planning system.</p> <p>Representations recommend an additional policy is included to read: <i>'New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan'.</i></p>
	16 (Highways England)	<p>Representation advise the contents of the Plan have been noted however there are no specific comments at this time.</p>

18 (Sport England)	Sport England have provided a standard response to the Plan. Representations highlight relevant guidance associated with the provision of open space.
19 (Natural England)	Natural England does not have any specific comments on the draft Neighbourhood Plan.
22 (HDC)	HDC advise it is expected 'healthcheck' comments will be addressed in full and all issues will be resolved in a satisfactory manner in the emerging Submission Draft West Grinstead Neighbourhood Plan.
1	No comments but supports the Plan.
2	No comments but supports the Plan.
4	No comments but supports the Plan.
5	No comments but supports the Plan.
6	Representations advise the Village needs homes for young and old at affordable prices and need places to work and good transport links.

	8		No comments but supports the Plan.
	12		<p>Representations advise the document does not list the Members of the Committee responsible for its generation, only Chairman Marcus Staples is mentioned.</p> <p>Representations question the reasons why some members should require this anonymity and ask if the PC and other parishioners are happy with this; as the representer is not.</p>
Chapter 4 - Countryside and Open Space			
Policy 1 - Retention of Local Gaps	23 (Gladman Developments Ltd)		<p>Representations submit the Policy is ambiguous and appears to be an attempt to preclude any development whatsoever from coming forward in the identified gap between the settlements of Partridge Green, Jolesfield and Littleworth.</p> <p>Representations submit there appears to be little robust evidence in the 'Retention of Local Gaps Paper' to support the policy other than their role as open countryside, nor the limits on the scale of development therein so that it is evident how a decision maker should react to development proposals.</p> <p>Representations submit the Policy as currently presented is in conflict with paragraph 16(d) of the Framework which requires policies to be clearly written and unambiguous. Representations submits any development proposed within these areas should be assessed on its own merits, depending on landscape.</p> <p>Submit Policy 1 would effectively create a lesser form of Green Belt by the back door.</p> <p>It is submitted Policy 1 in current form not in accordance with basic conditions (a) and (d) and should be deleted in its entirety.</p>

Policy 1 - Retention of Local Gaps

<p>24 (SIGMA Planning Services)</p>	<p>Representations are submitted on behalf of Rydon Homes who have an interest in land north of The Rise, Partridge Green, which they consider is suitable, developable and deliverable for a housing development of 40 – 55 units.</p> <p>Representations advise Policy is supported in principle.</p> <p>Representations confirm the agent is aware that the land, especially the eastern section, has particular local importance and sensitivity in relation to the preservation of the gap between Partridge Green and Littleworth and to the protection of the setting of Listed Buildings on the southern edge of Littleworth.</p> <p>Representations submit they do not believe preservation of the gap/setting prevents the delivery of housing development in this location provided that any development scheme is carefully and sensitively designed.</p> <p>Representations request that the NP recognises this potential and that its policies do not prevent development entirely, but to secure the important objectives of preventing coalescence of Partridge Green / Littleworth and protecting the setting of heritage assets.</p> <p>Representations advise of concern in respect of the extent of designated area and the wording of policy. It is submitted the proposed wording is too restrictive and potentially unjustifiably limits the opportunity and ability to achieve sustainable development.</p> <p>Representation submit the wording of Policy 1 is reasonable depending upon the interpretation of the wording 'significant reduction in the openness'. If this is interpreted as preventing any development within the designated area, then it is unjustifiably restrictive. If, however, it allows for development that can be demonstrated to be taking account of the need to avoid the coalescence of settlements and respecting the particular, important characteristics of each gap, then that would be appropriate. Representations advise the policy, or the accompanying text, should confirm that this will be the approach that is adopted.</p>
<p>26 (WYG)</p>	<p>Representations submit that proposed Local Gap policy for site number 3 (hereafter called LG3) does not meet requirements for designating site as Local Gap.</p> <p>It is submitted this will artificially reduce the number of sites available for assessment when the Neighbourhood Planning Group have to assess which sites should be included for the additional housing that will be needed (as part of the Local Plan review).</p>
<p>22 (HDC)</p>	<p>HDC strongly advised that both Local Gap 2 and Local Gap 3 are amended to not incorporate the southern fields which adjoin the settlement edge, it is the consideration of officers the two southern fields (shaded green) in LG2 have moderate capacity for development.</p> <p>HSC consider there is landscape capacity for low to moderate capacity for small scale development in LG3 (shaded green) and the proposed Local Gap is considered to be inappropriate and would be contrary to Policy 27 of the HDPF.</p> <p>HDC consider the proposed gap does not function to prevent coalescence with another settlement.</p>

<p>Local Gap 1 - Littleworth</p>	<p>6</p>	<p>Not supported. Representations consider there is already little to separate Littleworth from Partridge Green.</p>
	<p>7</p>	<p>Not supported. Representations consider there is no problem in closing gaps. Representation note Staples Hill got planning permission and so questions why not increase housing around there?</p>
	<p>24 (SIGMA Planning Services)</p>	<p>Identification of Local Gap on eastern side of Littleworth Lane is agreed by Rydon to be a reasonable policy for the Plan in principle.</p> <p>It is considered the extent of the designated area is larger than necessary.</p> <p>It is submitted the important elements of the gap are the frontage to Littleworth Lane and the setting of the heritage assets to the north. Representation state Littleworth Lane frontage is marked by a strong hedge and trees with limited views across the field to the East.</p> <p>It is submitted the perception of the gap is therefore more dependent upon the site frontage rather than the deeper part of the site. It is stated the northern part of the site is the most important to protect the setting of the heritage assets.</p> <p>Representations state these elements have been considered in the landscape assessment, which demonstrates essential elements of the gap can be protected with a suitably and sensitively designed development scheme.</p> <p>Representations submit the perception of the gap is particularly important to travellers along Littleworth Lane which is extensively used by pedestrians as it forms part of a recreational circular route around the village.</p> <p>It is considered the openness of the gap can be maintained for these purposes by setting development deeper into the site and retaining/enhancing the visual buffer along the site frontage. It is considered access would provide views across the site but with careful design and landscaping there will be no significant impact upon the perception of openness as one travels along Littleworth Lane. It is submitted there are very limited views from any other public viewpoint.</p> <p>Rydon seeks a reduction in the extent of the LG1 designation so that it is limited to the western end of the site currently identified and/or some text is introduced. It is recommend the text explain that the designation does not seek to do more than is necessary to protect the main characteristics of the gap and development proposals will not be prevented in principle but must demonstrate that the important features of the gap are maintained.</p>

Local Gap 2 - Jolesfield Common	6	Not supported. Representations consider here is already little to separate Jolesfield Common from Partridge Green.
	7	Not supported. Representations consider there is no problem in closing gaps. Representation note Staples Hill got planning permission and so questions why not increase housing around there?
Local Gap 3 - Jolesfield	6	Not supported. Representations consider here is already little to separate Jolesfield Common from Partridge Green.
	7	Not supported. Representations consider there is no problem in closing gaps. Representation note Staples Hill got planning permission and so questions why not increase housing around there? Representations advise fields may not be everyone's choice to build on but it is cheaper and safer option, causes no disruption to businesses and could alleviate some of the potential traffic issue on the High Street.

Local Gap 3 - Jolesfield

<p>26 (WYG)</p>	<p>Representations submit the proposed designation of LG3 has not been justified. Representations note the justification that is offered is set out in the supporting document. However it is considered it is not clear how this justifies a designation as a Local Gap on landscape grounds. Representations include a Landscape and Visual Appraisal which concludes existence of housing immediately to south and east of the site gives rise to a perception of being on the edge of settlement and does not give the sense of being in the countryside. The Report advises the surrounding dense vegetation gives it a very localised visual envelope and this "...results in a lack of visual connection with the steep downland scarp to the south (SDNP) and the High Weald fringes (High Weald AONB) to the north." The Landscape assessment states that the centre and south of the site have greater capacity for development than the north of the site and retention of open space in the north of the site would provide a suitable and sensitive transition between the built-up areas of Partridge Green to the south and the open agricultural land to the north. It is considered this approach allows for retention of open space between Partridge Green and Jolesfield - echoed by the HDC Landscape Capacity Rummey Design Information Booklet proposes the southern part of the site as phase 1 of development with the potential for more houses in the northeast corner of the site. Representations confirm the developer would be happy to just build this part of the site and protect the rest if that is considered necessary. Representations state the developer have sought to discuss this approach with the Steering Group and wishes to work with them to shape the proposed scheme. Representations state the Landscape Report sets out how the Gap policy is flawed as it does not recognise that the site is strongly perceived as being within Partridge Green due to the presence and visual influence of the adjoining dwellings to the south and east, so this site is just 'rounding off' the settlement. It is submitted the Local Gaps Background Document seeks to argue there is a historical reason that the site is within Jolesfield rather than Partridge Green. It is considered this assessment is incorrect. Evidence in support of the argument considered to be light and so RPS were commissioned to assess the point. It is submitted there is no historic connection between site and Jolesfield, no historic argument that the land should be designated as a Local Gap. It is submitted Policy 1 and Policies map need to be amended to remove designation LG3 if the NP is to be able to proceed.</p>
<p>6</p>	<p>Representations state Partridge Green is surrounded by Open Spaces that are easily accessible.</p>
<p>7</p>	<p>Representations state Partridge Green is very lucky to be surrounded by countryside that is only a short walk away and has a large park.</p>

Policy 3 - Local Green Space (LGS)	
LGS 1 - Meyers Wood	<p>6</p> <p>Representation agreed with proposed designation as it is considered impractical to build on this.</p>
	<p>7</p> <p>Representation agreed with proposed designation as it is considered impractical to use for anything else apart from possibly adding a few parking spaces for residents.</p>
LGS 2 - East & West of St Georges Road	<p>6</p> <p>Representations submit there is potential to use some of this area to ease residents parking issues.</p>
	<p>7</p> <p>Representation agreed with proposed designation as it is considered impractical to use for anything else apart from possibly adding a few parking spaces for residents.</p>
	<p>23</p> <p>(Gladman Developments Ltd)</p> <p>Representations state the Parish Council should ensure proposed designations are capable of meeting requirements of national policy</p> <p>It is not considered the WGNP's supporting evidence is sufficiently robust to justify proposed allocation of East and West of St Georges Road; as LGS, given lack of particularly special features.</p> <p>It is considered the sites have not been designated in accordance with national policy and guidance and are not in accordance with the basic conditions.</p> <p>Representations suggest the PC review the evidence supporting the proposed designations and ensure compliance with all the above requirements.</p> <p>It is submitted East and West of St Georges Road' appears to form an extensive tract of land. It is considered there is no evidence base to support this designated LGS being 'demonstrably special to a local community.' In relation to its beauty, it is submitted it is of no particular scenic quality.</p> <p>It is submitted the Policy has not been made in accordance with basic conditions (a) and (d). Recommend LGS Policy be revisited to ensure the designations are compliant in their entirety.</p>
	<p>15 - (WSCC)</p> <p>Representation state St Georges Road, is publicly maintainable highway land, held by WSCC.</p> <p>WSCC advise of concerned if the land became unavailable for any necessary future improvements or maintenance.</p> <p>Representations recommend the removal of the areas of Land to the east and west of St Georges Road.</p>

LGS 3 - Dial Post Green	3	Representations state the area must be retained as a Green Space.
Policy 4 - Green Infrastructure	6	Representations advise it is considered they are surrounded by green infrastructure and it is just a short walk away.
	7	Representations advise there is no issue with green infrastructure as the Parish benefits from footpaths, bridleways, open countryside all around us.
	20 (WSCC Planning Policy and Infrastructure)	Representation advise Para 4.21 notes that local PROW constitutes part of the Green Infrastructure network within the Parish. Suggested PROW is included within the Policy title for clarity. Representations recommend a criterion is added to the Policy to support development proposals that protect and develop the PROW network.
Chapter 5 - Community Infrastructure		
Policy 5 - Community Facilities	6	Support
	7	Support
	25 (Rural Planning Group for Knepp Castle)	Representations advise if community facilities and community infrastructure is import to the Parish this could be expressed specifically within the Policy. Representations confirm that as a major landowner in the Parish, the Kneep Estate have land and property where there is potential for redevelopment to provide access to enhanced community facilities including educations, such as at Swallows Farm.
Policy 6 - Broadband	6	Support
	7	Support
Aim 1 - Patridge Green Fire Station	3	Representations state a local fire station must be retained to adequately protect the local area.
	6	Representations state there are already churches and schools that could be used for community space, when not otherwise in use.

Aim 1 - Patridge Green Fire Station	7	Representations state there are already churches and schools that could be used for community space, when not otherwise in use.
	20 (WSCC Planning Policy and Infrastructure)	West Sussex Fire and Rescue Service would like to note that there is no intention of the Fire Station becoming redundant. It is therefore suggested that Part 2 of the Aim is reconsidered in light of the fact that the station is not available for potential development and is very unlikely to become available during the life of the plan.
Chapter 6 - Housing		
General	23 (Gladman Developments Ltd)	<p>Representations advise HDC are working on a review of their District Planning Framework. With this in mind, Gladman suggest sufficient flexibility is provided in the policies of the plan to safeguard the WGNP from conflicting with future development proposals should they be required.</p> <p>Representations submit it is important the WGNP takes account of the Standard Methodology and treats their allocation of 110 dwellings as de minimis. It is submitted a degree of flexibility is required to ensure that the WGNP is capable of being effective.</p> <p>It is submitted that planning for the housing requirement derived from the Standard Method during the current WGNP preparation process, would preclude the need to undertake the equivalent passage through the Regulations for a second time, in less than 2 years' time.</p> <p>Representations state that Gladman is promoting at Shermanbury Road and that the site is able to accommodate 120 dwellings including 35% affordable housing and substantial provision of green infrastructure.</p> <p>Representations submit it is considered the proposed approach to development beyond settlement boundaries is too restrictive and should be revised. Representations recommend a criteria-based approach to support sustainable development at suitable locations could be included.</p> <p>Gladman's preferred approach is provided by Policy HOU5 of the adopted Ashford Local Plan which was recently found sound. Considered this represents a positively prepared but balanced policy.</p> <p>Representations recommend the inclusion will help boost housing delivery, increasing the prospect that the Standard methodology to be set out in the HDPF Review can be achieved and will also assist in providing the necessary uplift in housing land supply required to meet identified housing need.</p>

Representations are submitted on behalf of Rydon Homes who have an interest in land north of The Rise, Partridge Green, which they consider is suitable, developable and deliverable for a housing development of 40 – 55 units.

Representations state SO1 seeks to promote a variety of suitable housing that reflects the needs of the Parish. NP has to consider wider housing needs at the Districtwide level. Incumbent upon the NP to accept and accommodate its share of strategic Districtwide housing needs.

With respect to housing, representations query:

1. Is it right not to have any housing allocation in the Plan and to rely upon a review of the Plan in 2021?
2. Is the aim of relocating existing businesses from the Huffwood Trading Estate to accommodate its ultimate redevelopment for housing a realistic, sustainable and deliverable option?

With respect to Housing Allocations representations note HDC have provided WGPC with an indicative housing requirement of 110 dwellings for the village.

Representations summarise the Options considered by the Working Group and advise the selection of Option 4 is not explained or justified. It is considered Option 2 is the option that is in closest conformity with Government policy.

The selection of Option 4, which makes no housing allocations is considered inconsistent with the Development Plan and national policy. It is considered there is a need to identify an additional 70 units beyond the Huffwood Trading Estate. It is considered this produces a requirement of at least a further two housing sites.

Representations state HDC's SHELAA identifies total of 162 dwellings and it is therefore considered there is no reason for failing to meet the housing needs.

It is considered Local Gap and LGS designations will undermine the ability of West Grinstead to provide necessary housing growth, now and in the future.

Recommend Draft Plan should be amended to:-

- Include 'meeting the strategic housing requirement indicated by the District Council' as part of its Objective S01;
- Adjust the boundaries of Local Gap LG1;
- Provide housing allocations to deliver a minimum of 110;
- Undertake detailed feasibility assessment of the impacts, consequences and deliverability of the proposal to re-develop;
- Policy 9 should be re-worded to allow the residential re-use of redundant agricultural buildings to be equally acceptable as other types of re-use.

General

<p>25 (Rural Planning Services for Knepp Castle)</p>	<p>With respect to housing, representations recommend the important role of small development sites or rural conversions could play outside of Partridge Green should be recognised to help meet the housing requirements of the Parish and the District Housing Land Supply.</p> <p>Representation confirm The Knepp Castle Estate have plans to redevelop Swallows Farm to provide a mixture of uses which will provide great benefit to jobs, tourism and communities in the area. It is considered that the Plan would benefit from including proposals such as this as a good example of rural development.</p>
<p>12</p>	<p>Representations submit the NP seems to reference very little from the Village Questionnaire. It is submitted the WGNP includes strong preference for redeveloping brownfield sites and seems to ignore other locations that were suggested in both the questionnaire and at subsequent presentations to the public.</p> <p>Representations state the NP indicates it will not be allocating any specific sites (other than Huffwood) for housing. At the start of preparation of NP, it was the one thing the PC and the NP Committee were keen to do, this aim has now clearly evaporated.</p> <p>Representations state infrastructure issues do not seem to be addressed in the Plan.</p> <p>Representations state "as one of the original members of the NP Working Group, I have to say I find this document very disappointing. I accept that things change, rules change, public bodies change their mind etc., but the original, main aim of the document was to identify how many houses we had to provide, and identify the sites preferred for their construction. It may be cruel to say this, but what we have now, after six years, is a proposal to support Huffwood and a statement "... to progress a Neighbourhood Plan which does not allocate sites ..."</p>
<p>Aim 2 - North and South of Star Road</p>	<p>3</p> <p>Representations state it is considered the proposal is excellent and makes perfect sense and will add to the support for local business.</p>

Representation state this would be a waste of money, could create a contaminated wasteland if any contamination is found.

It is considered the proposals creates more traffic and congestion in High St and potentially a new entrance into High St. Representation query how many parking spaces per house?

It is submitted the parking and traffic flow would need major consideration as both have already been highlighted as issues.

Considers choice of building at Huffwood & Star Road the most expensive option so unlikely to result in type of homes required.

Representations submit building new factory units on land South of Star Road i.e on green space has to happen before factories on Huffwood and north of Star Road can move. It is considered this takes time and could result in current factories looking elsewhere rather than re-locating in the village.

It is submitted once factory units have moved factories will need to be demolished, land tested and cleansed before any new housing can be built. Representations state someone must bear the cost, presumably the builder which will be passed on. If site is found to be contaminated and builder pulls out due to costs and unable to build on land the representer queries what will happen to the land and asked if it will be left with concreted area only factories can be built on?

Representations state if building project goes ahead the increased cost of the relocation and building on brownfield site will mean housing likely to be higher so won't meet community needs - unlikely to be any community incentive from the builder. It is considered the whole project to move, cleanse, and build houses will take years, no guarantee of completing once started.

It is submitted the sensible place to enter the estate would be via Star Road, which would become shared access for housing and industrial estate usage which could potentially be unattractive to home buyers.

It is submitted given the sewerage works is right in the corner of the land, smell and run off from sewerage works should be considered.

Representations start Shermanbury and Wineham are shortly starting to build right on the boundary with our Parish this also needs to be considered as they will be using the village facilities.

Representations query if the proposed Mayfield Market Town take away the need to build in our village? It is submitted this proposal seems to cover what is needed in the area and have transport links. It is considered this would make buying houses there more appealing than buying one in a crowded area next to a busy newly enlarged factory estate.

7	<p>Representations oppose plan. It is considered this is an unnecessary waste of time and money and will take much longer than building elsewhere and a full survey of the ground would need to be carried out in case of contamination. It is submitted this will increase traffic in the High Street.</p> <p>Furthermore it is submitted this option needs to be explained better to residents i.e. costs, the risk, the traffic and the types of housing etc. It is considered the people currently living in the area will be negatively impacted with loss of light, views and increased noise and traffic.</p>
9	<p>Representations state the consultation document confirms that units on Huffwood are on short term lease. It is submitted this is incorrect as 6 Units are privately owned.</p> <p>Representer states they own 1 of the units; and have to date not been consulted or advised of any matter concerning this.</p> <p>It is submitted if units are built the other side of Star Road the footfall in the village shops would be very down as a lot of people use them. If people did want to use the shops they would have to use cars and where would they park.</p> <p>Representations state unless 6 agree owners agree to plans there is a question whether the Estate would sell for development.</p> <p>Representations disagree with Industrial Units being built on a green field when nearly all units on Huffwood are occupied.</p>
11	<p>Representations state the Plan as written is incorrect and misleading and should be amended.</p> <p>Representation confirm they own a unit on Huffwood Industrial Estate with a legal right of way over significant parts of the land I do not own. Representations state they have not been engaged on any aspect of relocating to the south of Star Rd. It is submitted there are other owners in the same position.</p> <p>It is submitted it is therefore factually incorrect to state a) that the units at Huffwood are occupied on short term arrangements and b) that a MoU has been signed between the owners of Huffwood and the land south of Star Rd.</p> <p>It is submitted the term 'brownfield land/site' is generally held to mean previously developed land that is no longer in use. It is submitted that is not the case at Huffwood or Star Rd and it is considered the term should not be used for the purposes of this Plan.</p>

<p>12</p>	<p>It is submitted the NP appears to be almost totally reliant on the use of Huffwood Trading Estate and does not provide any definitive alternate proposals should this option fail.</p> <p>Representations do not agree that this is probably the best choice available in the Parish, Brownfield, central etc., but the NP goes on to propose relocation of premises in Star Road, and a new "industrial area" south of Star Road. Representations state they struggle to believe that the latter would have developers banging on the door.</p>
<p>13 (Rural Planning Group on behalf of Mr P Mills)</p>	<p>Rural Planning Group instructed by Mr Philip Mills, joint owner with his brother Mr William Mills, of Land South of Star Road.</p> <p>Representations set out support for the draft Neighbourhood Plan. Representations welcome Parish Council's support for development of Land to the South of Star Road Industrial Estate.</p> <p>It is considered the Plan could highlight the positive features of land south of Star Road</p> <p>Representations support Parish Council's approach to housing provision in Partridge Green</p> <p>Representation confirm a scheme for commercial development that includes the re-provision of space for Huffwood Trading Estate has been produced and is currently going through pre-application discussions with HDC. Confirms this process is moving quickly towards the submission of a planning application by the end of the year.</p> <p>It is submitted an application will re-provide the commercial space that will be lost at Huffwood Trading Estate plus more flexible and modern commercial space to attract internal re-locations from the Star Road Estate and help to address the general shortage of commercial space in the District.</p>
<p>23 (Gladman Developments Ltd)</p>	<p>It is submitted Aim is ambitious and, given its scale, somewhat unrealistic.</p> <p>It is submitted Aim 2 purports to be a response to initial public consultations calling for housing to be built on brownfield sites. It is considered there are two overriding reasons why this solution is fundamentally flawed. Firstly, Huffwood is not presently identifiable as brownfield land. The hypothetical alternative premises at which the businesses are to relocate to is greenfield land.</p> <p>Representations advise they consider there is a mismatch between the 'Aim' and it's supporting text. It is considered Aim 2 aspires for relocation to be "achieved successfully and expeditiously, which is viewed as a priority." The supporting text expects "long-term redevelopment in this area where landowners work</p> <p>Representations note that a signed Memorandum of Understanding (MoU) has been agreed however considers there would appear to be no effective mechanism in place to compel the businesses to relocate, other than through Compulsory Purchase powers.</p> <p>It is submitted there is no evidence provided with the suite of Neighbourhood Plan background documents to indicate that the scheme has been costed, nor any form of economic modelling undertaken.</p>

Representation confirm Aim 2 is considered seriously questionable because:-

1. Potentially undermines one of the defining characteristics of Partridge Green which is the number of small businesses and consequent employment that it exhibits.
2. It is very uncertain to be delivered.
3. The practicality and consequences of the idea have not been carefully and properly assessed.

It is considered proposals seek to destabilise the current situation and put current businesses in the position where they are forced to relocate locally, close, or move away from the village. It is considered this is an unnecessary risk to the character and vitality of the village as a whole.

It is considered the evidence base does not include any detailed appraisal of the advantages, disadvantages and consequences of the enforced removal of businesses from the Huffwood Trading Estate.

It is submitted the new commercial floor-space would be located on a greenfield site with adverse consequences for rural character and biodiversity.

Representation advises although discussions have taken place, it is considered this is a very superficial arrangement which is not binding.

It is submitted there does not appear to be anything in the evidence base that demonstrates that existing businesses in the HTE have been consulted and whether they are supportive or oppose the scheme.

It is submitted the identification of this matter as an 'Aim' rather than a policy is therefore too indefinite and a proper full and detailed assessment of the advantages, disadvantages and practicality of the proposal needs to be carried out quickly. A firm decision then needs to be made whether to include a policy for the redevelopment of HTE or to leave things.

It is submitted Aim 2 has not been demonstrated to be practicable, deliverable or sufficiently advantageous to justify inclusion in the NP.

It is submitted the interests and views of the landowners are not paramount. Considers it is the view of the individual businesses that should prevail and unless there is overwhelming majority of support from them for the proposal, it should not continue to be included as an Aim of the NP.

It is submitted there is no fallback policy within the Plan that would come into play if the proposed redevelopment of HTE fails to come to fruition. It is submitted the Plan therefore lacks flexibility and is in conflict with the NPPF.

It is submitted the Draft Plan not justified by a robust evidence base or effective in delivering sustainable development. It therefore does not comply with the basic conditions.

Representations submit Policy is unrealistic and does not understand the commercial reality of trying to move an existing business estate.

It is submitted the intention to move the existing commercial uses on Huffwood Trading Estate to land south of Star Road is unrealistic and again will result in much needed new housing not actually coming forward.

It is considered new development will be placed in existing green fields, which undermines the argument when there is land already available for new development that does not involve the upheaval of businesses.

Reside Development Ltd. commissioned Crickmay surveyors to advise on this relocation plan (letter sent with this objection) explain that existing Huffwood Estate provides older, smaller, cheaper units that meets an important need for small local businesses that cannot afford the higher rates charged by new build units. The result is the very high occupancy level over the years as the demand is high.

Representer is not aware of any business plan that demonstrates whether a new build commercial estate is viable in this location, notwithstanding whatever incentives would have to be offered to the existing businesses to move out into the new one.

It is considered the cost of dealing with the contamination on the site to make it suitable for residential development will have a significant impact. It is considered the financial argument does not appear to stand up to any scrutiny and the lack of evidence to support it means this proposal is not credible.

It is submitted there is no evidence that existing business can legally be required to move or that they want to and it is likely the new units will have a higher rent (possibly 50% higher psf) there seems little incentive for the businesses to move.

It is submitted Aim 2 should be removed until fully thought through, costed, and assessed as to whether the potential damage to existing businesses is worth the risk when there are other sites already available.

<p>14 (Southern Water)</p>	<p>Southern Water owns and operates Partridge Green Wastewater Treatment Works. It is submitted any new development proposed adjacent to a WTW must be informed by an odour assessment, to ensure adequate separation from the WTW and/or other appropriate mitigation can be agreed in advance.</p> <p>It is submitted an assessment of the site reveals that owing to its proximity to the WTW there are several existing foul sewers traversing the site. This existing infrastructure needs to be taken into account when designing the proposed development.</p> <p>Accordingly, SW propose the following additional paragraph be added to Aim 2: -</p> <p><i>Due to its location adjacent to Partridge Green Wastewater Treatment Works, the development layout must be informed by an odour assessment to be undertaken in consultation with Southern Water. Layout of the development must also be planned to ensure future access is maintained to existing underground sewage infrastructure for maintenance and upsizing purposes.</i></p>
<p>17 (Historic England)</p>	<p>Historic England state Aim 2 of the plan sets an intention and guidance for future plan making by the District</p> <p>Representations advise were this an allocation policy Historic England would expect to see assessment of the potential presence of previously unidentified heritage assets, including any archaeological remains previously recorded on the West Sussex Historic Environment Record within the SA/SEA and site allocation assessment.</p>
<p>20 (WSCC Planning Policy and Infrastructure)</p>	<p>Representations consider Aim is not specific in terms of housing numbers or exact location.</p> <p>WSCC may have further comments, if the site is allocated in a future plan with housing numbers or if an application comes forward.</p> <p>Lead Local Flood Authority (LLFA) notes there is a risk of localised surface water flooding, particularly within the Huffwood Trading Estate. The development of the site may entail a change in land use from less vulnerable to more vulnerable in an area of known flood risk.</p> <p>Representations submit if the site outlined in Aim were to come forward as an allocation or a planning application, the LLFA recommend that further investigation is made and a sequential and exception test is completed as outlined in NPPF.</p>
<p>21 (Environment Agency)</p>	<p>Representations note the WGNP is not seeking to allocate specific sites but have a community aim for sites north and south of Star Road.</p> <p>The Environment Agency are pleased to see that this site is located in Flood Zone 1.</p> <p>Checklist also included for info.</p>

<p>Aim 2 - North and South of Star Road Ctd...</p>	<p>22 (HDC)</p>	<p>HDC supports the community aim 'Aim 2: North and South of Star Road' which seeks to provide the Parish's housing need through the allocation of housing on brownfield land whilst the plan is reviewed.</p> <p>HDC state for absolute clarification, should 'Aim 2: North and South of Star Road' be deemed not to be viable nor deliverable then the Parish Council must give full consideration to the release of greenfield land, notwithstanding strategic allocations across the district.</p>
<p>Chapter 7 - Economy</p>		
<p>General</p>	<p>25 (Rural Planning Services for Knepp Castle)</p>	<p>With respect to the Economy section it is considered greater mention could be given to the important role that rural diversification schemes can play in contributing towards the rural economy.</p> <p>Vision and Strategic Objective: Considered that the Vision and Objectives could be more positive and creative and look for opportunities to actively promote and support appropriate sustainable development within the Parish.</p> <p>With respect to Strategic Objectives points 3 and 4 it is considered that this could be more positive and the wording could be changed to promoting rather than just supporting businesses within the Parish.</p>
<p>Policy 7 - Retail Premises</p>	<p>6</p>	<p>Representation recommend the Parish should avoid the loss of any retail premises as butchers, bakers and vets attract a lot of people to the village and this could be expanded upon.</p>
	<p>7</p>	<p>Representation advise loss of retail premises should be avoided. Consider more could be provided as there are lots of visitors to our current shops.</p>
<p>Policy 8 - Employment</p>	<p>6</p>	<p>Representations recommend the Plan should maintain or expand on employment opportunities. Queries the approach of Aim 2.</p>
	<p>7</p>	<p>Recommend expansion of employment opportunities should be encouraged, particularly when more people are working from home. Representation confirm they see no benefit of moving existing work premises to a new site.</p>

<p>Policy 8 - Employment</p>	<p>13 (RPG - Philip Mills)</p>	<p>Representations consider the importance of the Land to the South of the Star Road Industrial Estate should be recognised further directly within the draft employment policy.</p> <p>It is submitted the site has potential to meet more of the economic needs of the Horsham District and the Parish, not only as a space for the Huffwood Units to be re-provided.</p>
	<p>23 (Gladman Developments Ltd)</p>	<p>Representations advise it is considered the Parish Council is in real danger of not complying with its own Policy 8.</p> <p>It is considered the upheaval for businesses and their subsequent loss of premises on Huffwood Trading Estate would inevitably involve the loss of some businesses to other towns and villages in the area.</p> <p>It is considered to undertake relocation of Huffwood Trading Estate, proposers need to demonstrate through marketing material that current B1/B2/B8 business uses are no longer viable.</p> <p>It is submitted Policy 8 does not comply with basic condition e) 'the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority.</p>
	<p>25 (Rural Planning Group for Knepp Castle)</p>	<p>Approach supported</p>
<p>Policy 9 - Redundant Farm Buildings</p>	<p>3</p>	<p>Representations advise of supported as long as traffic management is controlled and is one of the key decision points in agreement with the local community.</p>
	<p>6</p>	<p>Representations advise of no preference with respect to conversion. It is considered it could be residential or commercial use, as long as either meets the needs of the village.</p>
	<p>7</p>	<p>Representations advise of no preference so long as any conversion meets with the requirements of the Parish i.e. suitable housing for young/old.</p>

<p>Policy 9 - Redundant Farm Buildings</p>	<p>24 (SIGMA Planning Services)</p>	<p>Representations submit Policy 9 makes conversion of redundant farm buildings to residential use a last resort measure. It is considered this is at odds with Government policy. It is considered the Policy runs contrary to Government's objective of boosting supply of housing by taking advantage of all sustainable opportunities to increase the number of new dwellings built or created across the nation. Representations recommends Policy should be amended to put residential re-use on an equal footing with other potential uses of redundant agricultural buildings.</p>
	<p>25 (Rural Planning Services for Knepp Castle)</p>	<p>Representations advise approach of policy 9 is generally welcomed by the Knepp Castle Estate. It is considered that this policy could also include not only redundant but also disused buildings which is more consistent with the approach taken in the NPPF. It is considered all potential use classes should be considered for redundant and disused rural buildings, depending on the individual merits and circumstances of each case. It is recognised there are now range of permitted development rights available for agricultural buildings to change use to a number of different uses which is not currently acknowledged within Draft Policy 9 at present. Representations advise Knepp Castle Estate are currently working on a project for Swallows Farm. Representations confirm a scheme which is supported by the Parish Council and planning application is due to be submitted shortly.</p>
<p>Chapter 8 - Transport</p>		
<p>Aim 3 - Roads, Traffic and Congestion</p>	<p>3</p>	<p>Supported.</p>
	<p>6</p>	<p>Totally opposed to any pinch points or speed bumps. Representations state this would cause congestion and pollution rather than easing traffic problems. It is submitted Littleworth Lane and South Street cause more pedestrian safety issues than the High Street.</p>
	<p>7</p>	<p>No to pinch points or speed bumps. Representations state this would Pedestrian safety is more of an issue in Littleworth Lane and South Street.</p>

Aim 3 - Roads, Traffic and Congestion	10	Recommend section 5 seek to redesign the junction layout between the B2135 and the A24 through the installation of traffic lights or a roundabout. It is submitted this junction is dangerous and there have been 26 accidents in the past 20 years.
Aim 4 - Congestion and Parking	3	Supported as the High Street around the Co Op and the vets/butchers is permanently a one way system due to parking.
	6	Representations state they don't often see parking on both sides of the high Street? it is submitted parked cars reduce speed of traffic. Many houses do not have off road parking. More information needed on what you are suggesting. It is submitted cyclists are part of the congestion issue.
	7	Representations don't agree that there is parking on both sides of the road. Most of the time parking reduces the speed of traffic. It is submitted congestion is at certain times of day. Many houses have no off road parking.
Policy 10 - Car Parking	6	Representations advise it is considered people should continue to be able to park outside or near their houses. It is submitted more parking should be made available. Lack of public transport means cars are essential. Lack of low cost homes means young adults still live at home, so many houses have multiple cars.
	7	Representations advise it is considered people need to continue to be able to park near or outside their homes. More parking should be made available to deal with family homes with multiple vehicles, which is the norm now due to expensive housing and poor public transport.
(WSSC Planning Policy and Infrastructure)	20	Representations advise the loss of a small number of car parking would not be able to be resisted on transport grounds as this would not be in full accordance with the NPPF. WSSC recommend the policy could be reworded to read <u>discouraged</u> instead of resisted.

<p>Aim 5 - Highways and Pedestrian Safety</p>	<p>3</p>	<p>Supported.</p>
	<p>6</p>	<p>No to pinch points or speed bumps. It is submitted car numbers will increase significantly if you build a Huffwood/Star Road, particularly if existing entrance to High St is maintained.</p>
	<p>7</p>	<p>No pinch points or speed humps. It is submitted building on Huffwood will increase traffic in the High Street and if there is insufficient parking for any new houses parking will be a bigger problem too.</p>
	<p>20 - (WSCC Planning Policy and Infrastructure)</p>	<p>It is submitted any traffic calming measures or speed limit changes should be brought forward with WSCC and in accordance with the relevant policies and procedures for implementing traffic calming schemes and speed limit changes.</p>
<p>Aim 6 - Bus Services</p>	<p>6</p>	<p>Agreed. Preferably also a regular service to Steyning and Shoreham.</p>
	<p>7</p>	<p>Agreed. As well as the existing service a route to Steyning would be beneficial.</p>
<p>Aim 7 - Footpaths, Bridleways and Cycleways</p>	<p>3</p>	<p>Support to ensure that local land owners maintain public footpaths across their land i.e. Knepp in winter becomes impossible.</p>
	<p>6</p>	<p>Representations state the Downs Link successfully goes through Southwater and Henfield where there has been building close to it. It is submitted a barrier to slow cyclists at the junction of Downs Link & Sussex Farm is needed for safety.</p>

Aim 7 - Footpaths, Bridleways and Cycleways

7	It is submitted walkers need consideration too. Query why part of the Downs Link can't successfully run past any housing developments as it does already in other places.
13 (RPG - Philip Mills)	Countryside & Open Space - It is recommended there is more of an emphasis on the management of footpaths and keeping them clear and well signposted.
25 (Rural Planning Services for Knepp Castle)	Countryside & Open Space - It is recommend section states 'support businesses that are sympathetic to and complement the rural character of the parish and its roads' . Representations suggest deleting it from here and inserting it in to the economy section.
20 (WSCC Planning Policy and Infrastructure)	<p>It is suggested that criterion 5 could be expanded further to include the establishment of a cycle/bridleway route from the Downs Link at Partridge Green to Shermanbury.</p> <p>Para 8.17 – the last sentence of this paragraph should read ‘ ... that links to the wider public-footpath PROW network.’</p> <p>Para 8.18 – This support could extend to the development of the PROW network, the creation of new routes for non-motorised users, making existing PROW more accessible and the creation of more cycling/ bridleway routes.</p>

SA COMMENTS

Summary of Comments

Commenter No.

Representations state HDC provided WGPC with an indicative housing requirement of 110 dwellings for the village. It confirms 4 options were considered by the NPWG.

Representations assert the selection of Option 4 is not explained or justified. Representations state there is no sustainability appraisal of these 4 options and this is a significant flaw in the methodology of the Plan preparation. It is submitted this undermines significantly the sounds of the Plan because the advantages of complying with Government policy to deliver housing to meet needs as quickly as possible has not been properly recognised or assessed.

It is submitted Option 2 is the option that is in closest conformity with Government Policy in that it positively aims to deliver without delay [sic] the housing requirement that is expected to be provided in the NP area and accords with the adopted Local Plan.

It is submitted Option 2 is the most sustainable option and is the only option that would be consistent with Development Plan policy and national policy.

24
(SIGMA Planning Services

With respect to Aim 2, it is submitted the appraisal upon which the SA is based assures [sic] that there are economic and social benefits that outweighs the negative impact. However it is considered those assumptions are illusory and not based upon proper analysis and evidence.

It is assumed that there will be no net loss of employment floor-space. This is not the correct test. The correct test is how many of the existing businesses are willing and able to move from Huffwood.

There is no assessment of what happens if only part of the HTE is cleared and the aim is frustrated or delayed as a result.

The significant positive attributed to Option A in the SA is not justified by a simple replacement of existing floor-space unless it can be demonstrated the business performance of the existing business is likely to be significantly improved as a result of a move to new premises. It is submitted that the fact that existing businesses have chosen to stay at Huffwood rather than move to new premises which are available at Star Road or elsewhere suggests that they do not see this as a wise economic move for them. It is submitted these uncertainties should give rise to a greater positive impact for the status quo rather than supporting a hypothetical gain.

8. HOW THE MAIN ISSUES HAVE BEEN CONSIDERED

- 8.1. Paragraph 15(2)(d) requires the Consultation Statement to describe how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.
- 8.2. Section 7 detailed the stakeholder feedback in Table 1.
- 8.3. Table 2 set out below, summaries comments received and how these have been taken into consideration in preparing the Submission Version WGNP (Regulation 16). This is presented thematically, for ease of cross-reference to the WGNP.

TABLE 2
STAKEHOLDER FEEDBACK
WITH COMMENTS

POLICIES/AIMS/GENERAL			Updates/Changes to WGNP
Policy	Committer No.	Summary of Comments	
General			
	24 (SIGMA Planning Services)	Rydon submit they are concerned by the heading to the comment sheet. It is considered restricting those who can have a voice in the NP substantially reduces its value and importance. It is submitted that comments that are relevant and justified need to be taken into account, irrespective of who makes them. Representations confirm the Plan's vision is supported, however it is considered the Strategic Objectives are too limited.	Comments noted. No changes to WGNP.
	25 (Rural Planning Services for Knepp Castle)	Representations confirm Knepp Castle Estate owns land around Dial Post village including Swallows Farm, Blakers Yard and New Barn Farm. Representations submit Knepp Castle Estate supports the NP. In respect of the Parish Profile: Representations recommend the Environment and Heritage section could include more information about the important work that the Knepp Castle Estate are carrying out ecologically through their pioneering and nationally important re-wilding project. It is submitted recognition could be given to the Knepp Castle Estate in the Plan. Given Knepp Castle is a Scheduled Ancient Monument it is submitted greater acknowledgement could be made of this within the Parish Profile.	Comments noted. Plan updated to recognise the ecological work of Knepp Castle Estate, and the importance of the Ancient Monument.
	14 - (Southern Water)	Representations submit there are no policies to support the provision of new or improved infrastructure. It is noted the Parish Council is not the planning authority in relation to wastewater development proposals. Representations submit support for essential infrastructure is required at all levels of the planning system. Representations recommend an additional policy is included to read: <i>'New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan'</i> .	Comments noted. No changes to WGNP. Policy 39 of the HDPF supports the provision of infrastructure in line with the delivery of sustainable development. In light of this higher tier policy, no changes are recommended.
	16 (Highways England)	Representation advise the contents of the Plan have been noted however there are no specific comments at this time.	Comments noted. No changes to WGNP.
	18 (Sport England)	Sport England have provided a standard response to the Plan. Representations highlight relevant guidance associated with the provision of open space.	Comments noted. No changes to WGNP.
	19 (Natural England)	Natural England does not have any specific comments on the draft Neighbourhood Plan.	Comments noted. No changes to WGNP.
	22 (HDC)	HDC advise it is expected 'healthcheck' comments will be addressed in full and all issues will be resolved in a satisfactory manner in the emerging Submission Draft West Grimstead Neighbourhood Plan.	Comments noted. No changes to WGNP.

1	No comments but supports the Plan.	Comments noted. No changes to WGNP.
2	No comments but supports the Plan.	Comments noted. No changes to WGNP.
4	No comments but supports the Plan.	Comments noted. No changes to WGNP.
5	No comments but supports the Plan.	Comments noted. No changes to WGNP.
6	Representations advise the Village needs homes for young and old at affordable prices and need places to work and good transport links.	Comments noted. No changes to WGNP.
8	No comments but supports the Plan.	Comments noted. No changes to WGNP.
12	Representations advise the document does not list the Members of the Committee responsible for its generation, only Chairman Marcus Staples is mentioned. Representations question the reasons why some members should require this anonymity and ask if the PC and other parishioners are happy with this; as the representer is not.	Comments. Consideration given to a notice being placed on the website/and or within the Plan to identify Members of the Working Group.
Chapter 4 - Countryside and Open Space		
23 (Gladman Developments Ltd)	Representations submit the Policy is ambiguous and appears to be an attempt to preclude any development whatsoever from coming forward in the identified gap between the settlements of Partridge Green, Jolesfield and Littleworth. Representations submit there appears to be little robust evidence in the 'Retention of Local Gaps Paper' to support the policy other than their role as open countryside, nor the limits on the scale of development therein so that it is evident how a decision maker should react to development proposals. Representations submit the Policy as currently presented is in conflict with paragraph 16(d) of the Framework which requires policies to be clearly written and unambiguous. Representations submits any development proposed within these areas should be assessed on its own merits, depending on landscape. Submit Policy 1 would effectively create a lesser form of Green Belt by the back door. It is submitted Policy 1 in current form not in accordance with basic conditions (a) and (c) and should be deleted in its entirety.	Comments noted. See updated Background Paper in respect of Retention of Local Gaps.
Policy 1 - Retention of Local Gaps		

<p>Policy 1 - Retention of Local Gaps</p>	<p>24 (SIGMA Planning Services)</p>	<p>Representations are submitted on behalf of Rydon Homes who have an interest in land north of The Rise, Partridge Green, which they consider is suitable, developable and deliverable for a housing development of 40 – 55 units. Representations advise Policy is supported in principle. Representations confirm the agent is aware that the land, especially the eastern section, has particular local importance and sensitivity in relation to the preservation of the gap between Partridge Green and Littleworth and to the protection of the setting of Listed Buildings on the southern edge of Littleworth. Representations submit they do not believe preservation of the gap/setting prevents the delivery of housing development in this location provided that any development scheme is carefully and sensitively designed. Representations request that the NP recognises this potential and that its policies do not prevent development entirely, but to secure the important objectives of preventing coalescence of Partridge Green / Littleworth and protecting the setting of heritage assets. Representations advise of concern in respect of the extent of designated area and the wording of policy. It is submitted the proposed wording is too restrictive and potentially unjustifiably limits the opportunity and ability to achieve sustainable development. Representation submit the wording of Policy 1 is reasonable depending upon the interpretation of the wording 'significant reduction in the openness'. If this is interpreted as preventing any development within the designated area, then it is unjustifiably restrictive. If, however, it allows for development that can be demonstrated to be taking account of the need to avoid the coalescence of settlements and respecting the particular, important characteristics of each gap, then that would be appropriate. Representations advise the policy, or the accompanying text, should confirm that this will be the approach that is adopted.</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>
	<p>26 (WYG)</p>	<p>Representations submit that proposed Local Gap policy for site number 3 (hereafter called LG3) does not meet requirements for designating site as Local Gap. It is submitted this will artificially reduce the number of sites available for assessment when the Neighbourhood Planning Group have to assess which sites should be included for the additional housing that will be needed (as part of the Local Plan review).</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>
	<p>22 (HDC)</p>	<p>HDC strongly advised that both Local Gap 2 and Local Gap 3 are amended to not incorporate the southern fields which adjoin the settlement edge, it is the consideration of officers the two southern fields (shaded green) in LG2 have moderate capacity for development. HSC consider there is landscape capacity for low to moderate capacity for small scale development in LG3 (shaded green) and the proposed Local Gap is considered to be inappropriate and would be contrary to Policy 27 of the HDPF. HDC consider the proposed gap does not function to prevent coalescence with another settlement.</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>
	<p>6</p>	<p>Not supported. Representations consider there is already little to separate Littleworth from Partridge Green.</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>
	<p>7</p>	<p>Not supported. Representations consider there is no problem in closing gaps. Representation note Staples Hill got planning permission and so questions why not increase housing around there?</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>
	<p>Local Gap 1 - Littleworth</p>		

<p>Local Gap 1 - Littleworth</p>	<p>24 (SIGMA Planning Services)</p>	<p>Identification of Local Gap on eastern side of Littleworth Lane is agreed by Rydon to be a reasonable policy for the Plan in principle. It is considered the extent of the designated area is larger than necessary. It is submitted the important elements of the gap are the frontage to Littleworth Lane and the setting of the heritage assets to the north. Representation state Littleworth Lane frontage is marked by a strong hedge and trees with limited views across the field to the East. It is submitted the perception of the gap is therefore more dependent upon the site frontage rather than the deeper part of the site. It is stated the northern part of the site is the most important to protect the setting of the heritage assets. Representations state these elements have been considered in the landscape assessment, which demonstrates essential elements of the gap can be protected with a suitably and sensitively designed development scheme. Representations submit the perception of the gap is particularly important to travellers along Littleworth Lane which is extensively used by pedestrians as it forms part of a recreational circular route around the village. It is considered the openness of the gap can be maintained for these purposes by setting development deeper into the site and retaining/enhancing the visual buffer along the site frontage. It is considered access would provide views across the site but with careful design and landscaping there will be no significant impact upon the perception of openness as one travels along Littleworth Lane. It is submitted there are very limited views from any other public viewpoint. Rydon seeks a reduction in the extent of the LG1 designation so that it is limited to the western end of the site currently identified and/or some text is introduced. It is recommend the text explain that the designation does not seek to do more than is necessary to protect the main characteristics of the gap and development proposals will not be prevented in principle but must demonstrate that the important features of the gap are maintained.</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>
<p>Local Gap 2 - Jolesfield Common</p>	<p>6</p>	<p>Not supported. Representations consider here is already little to separate Jolesfield Common from Partridge Green.</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>
<p>Local Gap 3 - Jolesfield</p>	<p>7</p>	<p>Not supported. Representations consider there is no problem in closing gaps. Representation note Staples Hill got planning permission and so questions why not increase housing around there?</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>
<p>Local Gap 3 - Jolesfield</p>	<p>6</p>	<p>Not supported. Representations consider here is already little to separate Jolesfield Common from Partridge Green.</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>
<p>Local Gap 3 - Jolesfield</p>	<p>7</p>	<p>Not supported. Representations consider there is no problem in closing gaps. Representation note Staples Hill got planning permission and so questions why not increase housing around there? Representations advise fields may not be everyone's choice to build on but it is cheaper and safer option, causes no disruption to businesses and could alleviate some of the potential traffic issue on the High Street.</p>	<p>Comments noted. See updated Background Paper in respect of Retention of Local Gaps.</p>

Local Gap 3 - Jolesfield	26 (WYG)	<p>Representations submit the proposed designation of LG3 has not been justified. Representations note the justification that is offered is set out in the supporting document. However it is considered it is not clear how this justifies a designation as a Local Gap on landscape grounds. Representations include a Landscape and Visual Appraisal which concludes existence of housing immediately to south and east of the site gives rise to a perception of being on the edge of settlement and does not give the sense of being in the countryside.</p> <p>The Report advises the surrounding dense vegetation gives it a very localised visual envelope and this "...results in a lack of visual connection with the steep downland scarp to the south (SDNP) and the High Weald fringes (High Weald AONB) to the north."</p> <p>The Landscape assessment states that the centre and south of the site have greater capacity for development than the north of the site and retention of open space in the north of the site would provide a suitable and sensitive transition between the built-up areas of Partridge Green to the south and the open agricultural land to the north. It is considered this approach allows for retention of open space between Partridge Green and Jolesfield - echoed by the HDC Landscape Capacity Rummey Design Information Booklet proposes the southern part of the site as phase 1 of development with the potential for more houses in the northeast corner of the site. Representations confirm the developer would be happy to just build this part of the site and protect the rest if that is considered necessary.</p> <p>Representations state the developer have sought to discuss this approach with the Steering Group and wishes to work with them to shape the proposed scheme.</p> <p>Representations state the Landscape Report sets out how the Gap policy is flawed as it does not recognise that the site is strongly perceived as being within Partridge Green due to the presence and visual influence of the adjoining dwellings to the south and east, so this site is just 'rounding off' the settlement.</p> <p>It is submitted the Local Gaps Background Document seeks to argue there is a historical reason that the site is within Jolesfield rather than Partridge Green. It is considered this assessment is incorrect. Evidence in support of the argument considered to be light and so RPS were commissioned to assess the point. It is submitted there is no historic connection between site and Jolesfield, no historic argument that the land should be designated as a Local Gap.</p> <p>It is submitted Policy 1 and Policies map need to be amended to remove designation LG3 if the NP is to be able to proceed.</p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Retention of Local Gaps.</p>
Policy 2 - Open Space	6	<p>Representations state Partridge Green is surrounded by Open Spaces that are easily accessible.</p>	<p>Comments noted.</p> <p>No changes to WGNP.</p>
	7	<p>Representations state Partridge Green is very lucky to be surrounded by countryside that is only a short walk away and has a large park.</p>	<p>Comments noted.</p> <p>No changes to WGNP.</p>
Policy 3 - Local Green Space (LGS)			
LGS 1 - Meyers Wood	6	<p>Representation agreed with proposed designation as it is considered impractical to build on this.</p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Retention of Local Green Space.</p>
	7	<p>Representation agreed with proposed designation as it is considered impractical to use for anything else apart from possibly adding a few parking spaces for residents.</p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Retention of Local Green Space.</p>

LGS 2 - East & West of St Georges Road	6	<p>Representations submit there is potential to use some of this area to ease residents parking issues.</p>	Comments noted. See updated Background Paper in respect of Retention of Local Green Space.
	7	<p>Representation agreed with proposed designation as it is considered impractical to use for anything else apart from possibly adding a few parking spaces for residents.</p>	Comments noted. See updated Background Paper in respect of Retention of Local Green Space.
	23 (Gladman Developments Ltd)	<p>Representations state the Parish Council should ensure proposed designations are capable of meeting requirements of national policy It is not considered the WGNP's supporting evidence is sufficiently robust to justify proposed allocation of East and West of St Georges Road; as LGS, given lack of particularly special features. It is considered the sites have not been designated in accordance with national policy and guidance and are not in accordance with the basic conditions. Representations suggest the PC review the evidence supporting the proposed designations and ensure compliance with all the above requirements. It is submitted East and West of St Georges Road' appears to form an extensive tract of land. It is considered there is no evidence base to support this designated LGS being 'demonstrably special to a local community'. In relation to its beauty, it is submitted it is of no particular scenic quality. It is submitted the Policy has not been made in accordance with basic conditions (a) and (d). Recommend LGS Policy be revisited to ensure the designations are compliant in their entirety.</p>	Comments noted. See updated Background Paper in respect of Retention of Local Green Space.
	15 - (WSCC)	<p>Representation state St Georges Road, is publicly maintainable highway land, held by WSCC. WSCC advise of concern if the land became unavailable for any necessary future improvements or maintenance. Representations recommend the removal of the areas of Land to the east and west of St Georges Road.</p>	Comments noted. See updated Background Paper in respect of Retention of Local Green Space, which recommends Policy 3 c is updated to read: Are required for <u>works</u> by a statutory utility or infrastructure purpose provider.
LGS 3 - Dial Post Green	3	<p>Representations state the area must be retained as a Green Space.</p>	Comments noted. See updated Background Paper in respect of Retention of Local Green Space.
Policy 4 - Green Infrastructure	6	<p>Representations advise it is considered they are surrounded by green infrastructure and it is just a short walk away.</p>	Comments noted. No changes to WGNP.
	7	<p>Representations advise there is no issue with green infrastructure as the Parish benefits from footpaths, bridleways, open countryside all around us.</p>	Comments noted. No changes to WGNP.
	20 (WSCC Planning Policy and Infrastructure)	<p>Representation advise Para 4.21 notes that local PROW constitutes part of the Green Infrastructure network within the Parish. Suggested PROW is included within the Policy title for clarity. Representations recommend a criterion is added to the Policy to support development proposals that protect and develop the PROW network.</p>	Comments noted. Given green infrastructure can include, but is not limited to PROW it is not considered necessary to update the Policy title. Additional criterion in Policy 4 to support proposals that protect and develop the PROW network.

Chapter 5 - Community Infrastructure			
Policy 5 - Community Facilities	6	Support	Comments noted. No changes to WGNP.
	7	Support	Comments noted. No changes to WGNP.
	25 (Rural Planning Group for Knepp Castle)	Representations advise if community facilities and community infrastructure is import to the Parish this could be expressed specifically within the Policy. Representations confirm that as a major landowner in the Parish, the Kneep Estate have land and property where there is potential for redevelopment to provide access to enhanced community facilities including educations, such as at Swallows Farm.	5.3 is updated to confirm the existing local community facilities are considered a benefit and the Parish Council wish to protect local assets.
Policy 6 - Broadband	6	Support	Comments noted. No changes to WGNP.
	7	Support	Comments noted. No changes to WGNP.
Aim 1 - Patridge Green Fire Station	3	Representations state a local fire station must be retained to adequately protect the local area.	Comments noted. No changes to WGNP.
	6	Representations state there are already churches and schools that could be used for community space, when not otherwise in use.	Comments noted. No changes to WGNP.
	7	Representations state there are already churches and schools that could be used for community space, when not otherwise in use.	Comments noted. No changes to WGNP.
	20 (WSCC Planning Policy and Infrastructure)	West Sussex Fire and Rescue Service would like to note that there is no intention of the Fire Station becoming redundant. It is therefore suggested that Part 2 of the Aim is reconsidered in light of the fact that the station is not available for potential development and is very unlikely to become available during the life of the plan.	In light of comments received, recommend consideration is given to deleting part 2 of Aim 1. Part 2 to read: "If a time arrives where the existing Fire Station is no longer required the Parish Council wish to support a mixed-use development proposal to provide a focal point in the village centre, where is accords with Development Plan policies.

Chapter 6 - Housing

General

23
(Gladman Developments Ltd)

Representations advise HDC are working on a review of their District Planning Framework. With this in mind, Gladman suggest sufficient flexibility is provided in the policies of the plan to safeguard the WGNP from conflicting with future development proposals should they be required.
Representations submit it is important the WGNP takes account of the Standard Methodology and treats their allocation of 110 dwellings as de minimis. It is submitted a degree of flexibility is required to ensure that the WGNP is capable of being effective.
It is submitted that planning for the housing requirement derived from the Standard Method during the current WGNP preparation process, would preclude the need to undertake the equivalent passage through the Regulations for a second time, in less than 2 years' time.
Representations state that Gladman is promoting at Shermanbury Road and that the site is able to accommodate 120 dwellings including 35% affordable housing and substantial provision of green infrastructure.
Representations submit it is considered the proposed approach to development beyond settlement boundaries is too restrictive and should be revised. Representations recommend a criteria-based approach to support sustainable development at suitable locations could be included.
Gladman's preferred approach is provided by Policy HOU5 of the adopted Ashford Local Plan which was recently found sound. Considered this represents a positively prepared but balanced policy.
Representations recommend the inclusion will help boost housing delivery, increasing the prospect that the Standard methodology to be set out in the HDPF Review can be achieved and will also assist in providing the necessary uplift in housing land supply required to meet identified housing need.

Comments noted.
See updated Background Paper in respect of Huffwood.

24
(SIGMA Planning Services)

Representations are submitted on behalf of Rydon Homes who have an interest in land north of The Rise, Partridge Green, which they consider is suitable, developable and deliverable for a housing development of 40 – 55 units.
Representations state SO1 seeks to promote a variety of suitable housing that reflects the needs of the Parish. NP has to consider wider housing needs at the Districtwide level. Incumbent upon the NP to accept and accommodate its share of strategic Districtwide housing needs.
With respect to housing, representations query:
1. Is it right not to have any housing allocation in the Plan and to rely upon a review of the Plan in 2021?
2. Is the aim of relocating existing businesses from the Huffwood Trading Estate to accommodate its ultimate redevelopment for housing a realistic, sustainable and deliverable option?
With respect to Housing Allocations representations note HDC have provided WGFC with an indicative housing requirement of 110 dwellings for the village.
Representations summarise the Options considered by the Working Group and advise the selection of Option 4 is not explained or justified. It is considered Option 2 is the option that is in closest conformity with Government policy.
The selection of Option 4, which makes no housing allocations is considered inconsistent with the Development Plan and national policy. It is considered there is a need to identify an additional 70 units beyond the Huffwood Trading Estate. It is considered this produces a requirement of at least a further two housing sites.

Comments noted.
See updated Background Paper in respect of Huffwood.

General

<p>24 ctd... (SIGMA Planning Services)</p>	<p>Representations state HDC's SHELAA identifies total of 162 dwellings and it is therefore considered there is no reason for failing to meet the housing needs. It is considered Local Gap and LGS designations will undermine the ability of West Grinstead to provide necessary housing growth, now and in the future. Recommend Draft Plan should be amended to:-</p> <ul style="list-style-type: none"> • Include 'meeting the strategic housing requirement indicated by the District Council' as part of its Objective S01; • Adjust the boundaries of Local Gap LG1; • Provide housing allocations to deliver a minimum of 110; • Undertake detailed feasibility assessment of the impacts, consequences and deliverability of the proposal to re-develop; and • Policy 9 should be re-worded to allow the residential re-use of redundant agricultural buildings to be equally acceptable as other types of re-use. 	<p>Comments noted. See updated Background Paper in respect of Huffwood; Local Gap; and LGS.</p>
<p>25 (Rural Planning Services for Knepp Castle)</p>	<p>With respect to housing, representations recommend the important role of small development sites or rural conversions could play outside of Partridge Green should be recognised to help meet the housing requirements of the Parish and the District Housing Land Supply. Representation confirm The Knepp Castle Estate have plans to redevelop Swallows Farm to provide a mixture of uses which will provide great benefit to jobs, tourism and communities in the area. It is considered that the Plan would benefit from including proposals such as this as a good example of rural development.</p>	<p>Comments noted. No changes to WGNP.</p>
<p>12</p>	<p>Representations submit the NP seems to reference very little from the Village Questionnaire. It is submitted the WGNP includes strong preference for redeveloping brownfield sites and seems to ignore other locations that were suggested in both the questionnaire and at subsequent presentations to the public. Representations state the NP indicates it will not be allocating any specific sites (other than Huffwood) for housing. At the start of preparation of NP, it was the one thing the PC and the NP Committee were keen to do, this aim has now clearly evaporated. Representations state infrastructure issues do not seem to be addressed in the Plan. Representations state "as one of the original members of the NP Working Group, I have to say I find this document very disappointing. I accept that things change, rules change, public bodies change their mind etc., but the original, main aim of the document was to identify how many houses we had to provide, and identify the sites preferred for their construction. It may be cruel to say this, but what we have now, after six years, is a proposal to support Huffwood and a statement "... to progress a Neighbourhood Plan which does not allocate sites ..."</p>	<p>Comments noted. See updated Background Paper in respect of Huffwood.</p>
<p>3</p>	<p>Representations state it is considered the proposal is excellent and makes perfect sense and will add to the support for local business.</p>	<p>Comments noted. No changes to WGNP.</p>

Aim 2 - North and South of Star Road

<p>6</p>	<p>Representation state this would be a waste of money, could create a contaminated wasteland if any contamination is found.</p> <p>It is considered the proposals creates more traffic and congestion in High St and potentially a new entrance into High St. Representation query how many parking spaces per house?</p> <p>It is submitted the parking and traffic flow would need major consideration as both have already been highlighted as issues.</p> <p>Considers choice of building at Huffwood & Star Road the most expensive option so unlikely to result in type of homes required.</p> <p>Representations submit building new factory units on land South of Star Road i.e on green space has to happen before factories on Huffwood and north of Star Road can move. It is considered this takes time and could result in current factories looking elsewhere rather than re-locating in the village.</p> <p>It is submitted once factory units have moved factories will need to be demolished, land tested and cleaned before any new housing can be built. Representations state someone must bear the cost, presumably the builder which will be passed on. If site is found to be contaminated and builder pulls out due to costs and unable to build on land the representer queries what will happen to the land and asked if it will be left with concreted area only factories can be built on?</p> <p>Representations state if building project goes ahead the increased cost of the relocation and building on brownfield site will mean housing likely to be higher so won't meet community needs - unlikely to be any community incentive from the builder. It is considered the whole project to move, cleanse, and build houses will take years, no guarantee of completing once started.</p> <p>It is submitted the sensible place to enter the estate would be via Star Road, which would become shared access for housing and industrial estate usage which could potentially be unattractive to home buyers.</p> <p>It is submitted given the sewerage works is right in the corner of the land, smell and run off from sewerage works should be considered.</p> <p>Representations start Shermanbury and Wineham are shortly starting to build right on the boundary with our Parish this also needs to be considered as they will be using the village facilities.</p> <p>Representations query: if the proposed Mayfield Market Town take away the need to build in our village? It is submitted this proposal seems to cover what is needed in the area and have transport links. It is considered this would make buying houses there more appealing than buying one in a crowded area next to a busy newly enlarged factory estate.</p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Huffwood.</p>
<p>7</p>	<p>Representations oppose plan. It is considered this is an unnecessary waste of time and money and will take much longer than building elsewhere and a full survey of the ground would need to be carried out in case of contamination. It is submitted this will increase traffic in the High Street.</p> <p>Furthermore it is submitted this option needs to be explained better to residents i.e. costs, the risk, the traffic and the types of housing etc. It is considered the people currently living in the area will be negatively impacted with loss of light, views and increased noise and traffic.</p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Huffwood.</p>
<p>9</p>	<p>Representations state the consultation document confirms that units on Huffwood are on short term lease. It is submitted this is incorrect as 6 Units are privately owned.</p> <p>Representer states they own 1 of the units; and have to date not been consulted or advised of any matter concerning this.</p> <p>It is submitted if units are built the other side of Star Road the footfall in the village shops would be very down as a lot of people use them. If people did want to use the shops they would have to use cars and where would they park.</p> <p>Representations state unless 6 agree owners agree to plans there is a question whether the Estate would sell for development.</p> <p>Representations disagree with Industrial Units being built on a green field when nearly all units on Huffwood are occupied.</p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Huffwood.</p>

<p>11</p>	<p>Representations state the Plan as written is incorrect and misleading and should be amended. Representation confirm they own a unit on Huffwood Industrial Estate with a legal right of way over significant parts of the land I do not own. Representations state they have not been engaged on any aspect of relocating to the south of Star Rd. It is submitted there are other owners in the same position. It is submitted it is therefore factually incorrect to state a) that the units at Huffwood are occupied on short term arrangements and b) that a MoU has been signed between the owners of Huffwood and the land south of Star Rd. It is submitted the term 'brownfield land/site' is generally held to mean previously developed land that is no longer in use. It is submitted that is not the case at Huffwood or Star Rd and it is considered the term should not be used for the purposes of this Plan.</p>	<p>Comments noted. See updated Background Paper in respect of Huffwood.</p>
<p>12</p>	<p>It is submitted the NP appears to be almost totally reliant on the use of Huffwood Trading Estate and does not provide any definitive alternate proposals should this option fail. Representations do not agree that this is probably the best choice available in the Parish, Brownfield, central etc., but the NP goes on to propose relocation of premises in Star Road, and a new "industrial area" south of Star Road. Representations state they struggle to believe that the latter would have developers banging on the door.</p>	<p>Comments noted. See updated Background Paper in respect of Huffwood.</p>
<p>13 (Rural Planning Group on behalf of Mr P Mills)</p>	<p>Rural Planning Group instructed by Mr Philip Mills, joint owner with his brother Mr William Mills, of Land South of Star Road. Representations set out support for the draft Neighbourhood Plan. Representations welcome Parish Council's support for development of Land to the South of Star Road Industrial Estate. It is considered the Plan could highlight the positive features of land south of Star Road Representations support Parish Council's approach to housing provision in Partridge Green Representation confirm a scheme for commercial development that includes the re-provision of space for Huffwood Trading Estate has been produced and is currently going through pre-application discussions with HDC. Confirms this process is moving quickly towards the submission of a planning application by the end of the year. It is submitted an application will re-provide the commercial space that will be lost at Huffwood Trading Estate plus more flexible and modern commercial space to attract internal re-locations from the Star Road Estate and help to address the general shortage of commercial space in the District.</p>	<p>Comments noted. See updated Background Paper in respect of Huffwood.</p>
<p>23 (Gladman Developments Ltd)</p>	<p>It is submitted Aim is ambitious and, given its scale, somewhat unrealistic. It is submitted Aim 2 purports to be a response to initial public consultations calling for housing to be built on brownfield sites. It is considered there are two overriding reasons why this solution is fundamentally flawed. Firstly, Huffwood is not presently identifiable as brownfield land. The hypothetical alternative premises at which the businesses are to relocate to is greenfield land. Representations advise they consider there is a mismatch between the 'Aim' and it's supporting text. It is considered Aim 2 aspires for relocation to be "achieved successfully and expeditiously, which is viewed as a priority, ". The supporting text expects "long-term redevelopment in this area where landowners work Representations note that a signed Memorandum of Understanding (MoU) has been agreed however considers there would appear to be no effective mechanism in place to compel the businesses to relocate, other than through Compulsory Purchase powers. It is submitted there is no evidence provided with the suite of Neighbourhood Plan background documents to indicate that the scheme has been costed, nor any form of economic modelling undertaken.</p>	<p>Comments noted. See updated Background Paper in respect of Huffwood.</p>

Representation confirm Aim 2 is considered seriously questionable because:-
1. Potentially undermines one of the defining characteristics of Partridge Green which is the number of small businesses and consequent employment that it exhibits.
2. It is very uncertain to be delivered.
3. The practicality and consequences of the idea have not been carefully and properly assessed. It is considered proposals seek to destabilise the current situation and put current businesses in the position where they are forced to relocate locally, close, or move away from the village. It is considered this is an unnecessary risk to the character and vitality of the village as a whole.
It is considered the evidence base does not include any detailed appraisal of the advantages, disadvantages and consequences of the enforced removal of businesses from the Huffwood Trading Estate.
It is submitted the new commercial floor-space would be located on a greenfield site with adverse consequences for rural character and biodiversity.
Representation advises although discussions have taken place, it is considered this is a very superficial arrangement which is not binding.
It is submitted there does not appear to be anything in the evidence base that demonstrates that existing businesses in the HTE have been consulted and whether they are supportive or oppose the scheme.
It is submitted the identification of this matter as an 'Aim' rather than a policy is therefore too indefinite and a proper full and detailed assessment of the advantages, disadvantages and practicality of the proposal needs to be carried out quickly. A firm decision then needs to be made whether to include a policy for the redevelopment of HTE or to leave things.
It is submitted Aim 2 has not been demonstrated to be practicable, deliverable or sufficiently advantageous to justify inclusion in the NP.
It is submitted the interests and views of the landowners are not paramount. Considers it is the view of the individual businesses that should prevail and unless there is overwhelming majority of support from them for the proposal, it should not continue to be included as an Aim of the NP.
It is submitted there is no fallback policy within the Plan that would come into play if the proposed redevelopment of HTE fails to come to fruition. It is submitted the Plan therefore lacks flexibility and is in conflict with the NPPF.
It is submitted the Draft Plan not justified by a robust evidence base or effective in delivering sustainable development. It therefore does not comply with the basic conditions.

Comments noted.
See updated Background Paper in respect of Huffwood.

<p>26 (WYG)</p>	<p>Representations submit Policy is unrealistic and does not understand the commercial reality of trying to move an existing business estate.</p> <p>It is submitted the intention to move the existing commercial uses on Huffwood Trading Estate to land south of Star Road is unrealistic and again will result in much needed new housing not actually coming forward.</p> <p>It is considered new development will be placed in existing green fields, which undermines the argument when there is land already available for new development that does not involve the upheaval of businesses.</p> <p>Reside Development Ltd. commissioned Crickmay surveyors to advise on this relocation plan (letter sent with this objection) explain that existing Huffwood Estate provides older, smaller, cheaper units that meets an important need for small local businesses that cannot afford the higher rates charged by new build units. The result is the very high occupancy level over the years as the demand is high.</p> <p>Representer is not aware of any business plan that demonstrates whether a new build commercial estate is viable in this location, notwithstanding whatever incentives would have to be offered to the existing businesses to move out into the new one.</p> <p>It is considered the cost of dealing with the contamination on the site to make it suitable for residential development will have a significant impact. It is considered the financial argument does not appear to stand up to any scrutiny and the lack of evidence to support it means this proposal is not credible.</p> <p>It is submitted there is no evidence that existing business can legally be required to move or that they want to and it is likely the new units will have a higher rent (possibly 50% higher psf) there seems little incentive for the businesses to move.</p> <p>It is submitted Aim 2 should be removed until fully thought through, costed, and assessed as to whether the potential damage to existing businesses is worth the risk when there are other sites already available.</p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Huffwood.</p>
<p>14 (Southern Water)</p>	<p>Southern Water owns and operates Partridge Green Wastewater Treatment Works.</p> <p>It is submitted any new development proposed adjacent to a WTW must be informed by an odour assessment, to ensure adequate separation from the WTW and/or other appropriate mitigation can be agreed in advance.</p> <p>It is submitted an assessment of the site reveals that owing to its proximity to the WTW there are several existing foul sewers traversing the site. This existing infrastructure needs to be taken into account when designing the proposed development.</p> <p>Accordingly, SW propose the following additional paragraph be added to Aim 2: -</p> <p><i>Due to its location adjacent to Partridge Green Wastewater Treatment Works, the development layout must be informed by an odour assessment to be undertaken in consultation with Southern Water. Layout of the development must also be planned to ensure future access is maintained to existing underground sewage infrastructure for maintenance and upsizing purposes.</i></p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Huffwood.</p> <p>Additional paragraph included to read:</p> <p><u>Due to its location adjacent to Partridge Green Wastewater Treatment Works, the development layout must be informed by an odour assessment to be undertaken in consultation with Southern Water. Layout of the development must also be planned to ensure future access is maintained to existing underground sewage infrastructure for maintenance and upsizing purposes.</u></p>
<p>17 (Historic England)</p>	<p>Historic England state Aim 2 of the plan sets an intention and guidance for future plan making by the District</p> <p>Representations advise were this an allocation policy Historic England would expect to see assessment of the potential presence of previously unidentified heritage assets, including any archaeological remains previously recorded on the West Sussex Historic Environment Record within the SA/SEA and site allocation assessment.</p>	<p>Comments noted.</p> <p>No changes to WGNP.</p>

<p>Aim 2 - North and South of Star Road Ctd....</p>	<p>20 (WSCC Planning Policy and Infrastructure)</p>	<p>Representations consider Aim is not specific in terms of housing numbers or exact location. WSCC may have further comments, if the site is allocated in a future plan with housing numbers or if an application comes forward. Lead Local Flood Authority (LLFA) notes there is a risk of localised surface water flooding, particularly within the Huffwood Trading Estate. The development of the site may entail a change in land use from less vulnerable to more vulnerable in an area of known flood risk. Representations submit if the site outlined in Aim were to come forward as an allocation or a planning application, the LLFA recommend that further investigation is made and a sequential and exception test is completed as outlined in NPPF.</p>	<p>Comments noted. No changes to WGNP. Comments noted re surface water flooding. Note Huffwood lies within flood zone 1 which has the lowest probability of flooding.</p>
	<p>21 (Environment Agency)</p>	<p>Representations note the WGNP is not seeking to allocate specific sites but have a community aim for sites north and south of Star Road. The Environment Agency are pleased to see that this site is located in Flood Zone 1. Checklist also included for info.</p>	<p>Comments noted. No changes to WGNP.</p>
	<p>22 (HDC)</p>	<p>HDC supports the community aim 'Aim 2: North and South of Star Road' which seeks to provide the Parish's housing need through the allocation of housing on brownfield land whilst the plan is reviewed. HDC state for absolute clarification, should 'Aim 2: North and South of Star Road' be deemed not to be viable nor deliverable then the Parish Council must give full consideration to the release of greenfield land, notwithstanding strategic allocations across the district.</p>	<p>Comments noted. No changes to WGNP.</p>
<p>Chapter 7 - Economy</p>			
	<p>25 (Rural Planning Services for Knapp Castle)</p>	<p>With respect to the Economy section it is considered greater mention could be given to the important role that rural diversification schemes can play in contributing towards the rural economy. Vision and Strategic Objective: Considered that the Vision and Objectives could be more positive and creative and look for opportunities to actively promote and support appropriate sustainable development within the Parish. With respect to Strategic Objectives points 3 and 4 it is considered that this could be more positive and the wording could be changed to promoting rather than just supporting businesses within the Parish.</p>	<p>Comments noted. Strategic Objectives 3 and 4 updated.</p>
<p>Policy 7 - Retail Premises</p>	<p>6</p>	<p>Representation recommend the Parish should avoid the loss of any retail premises as butchers, bakers and vets attract a lot of people to the village and this could be expanded upon.</p>	<p>Comments noted. No changes to WGNP.</p>
	<p>7</p>	<p>Representation advise loss of retail premises should be avoided. Consider more could be provided as there are lots of visitors to our current shops.</p>	<p>Comments noted. No changes to WGNP.</p>
<p>Policy 8 - Employment</p>	<p>6</p>	<p>Representations recommend the Plan should maintain or expand on employment opportunities. Queries the approach of Aim 2.</p>	<p>Comments noted. See updated Background Paper in respect of Huffwood.</p>
	<p>7</p>	<p>Recommend expansion of employment opportunities should be encouraged, particularly when more people are working from home. Representation confirm they see no benefit of moving existing work premises to a new site.</p>	<p>Comments noted. See updated Background Paper in respect of Huffwood.</p>

<p>Policy 8 - Employment</p>	<p>13 (RPG - Philip Mills)</p>	<p>Representations consider the importance of the Land to the South of the Star Road Industrial Estate should be recognised further directly within the draft employment policy.</p> <p>It is submitted the site has potential to meet more of the economic needs of the Horsham District and the Parish, not only as a space for the Huffwood Units to be re-provided.</p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Huffwood.</p> <p>Supporting text of Policy 8:Employment and Policy updated to support support development proposals which fall within the strategy outlined in Aim 2.</p>
	<p>23 (Gladman Developments Ltd)</p>	<p>Representations advise it is considered the Parish Council is in real danger of not complying with its own Policy 8.</p> <p>It is considered the upheaval for businesses and their subsequent loss of premises on Huffwood Trading Estate would inevitably involve the loss of some businesses to other towns and villages in the area.</p> <p>It is consider to undertake relocation of Huffwood Trading Estate, proposers need to demonstrate through marketing material that current B1/B2/B8 business uses are no longer viable.</p> <p>It is submitted Policy 8 does not comply with basic condition e) 'the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority.</p>	<p>Comments noted.</p> <p>See updated Background Paper in respect of Huffwood.</p>
	<p>25 (Rural Planning Group for Knepp Castle)</p>	<p>Approach supported</p>	<p>Comments noted.</p> <p>No changes to WGNP.</p>
<p>Policy 9 - Redundant Farm Buildings</p>	<p>3</p>	<p>Representations advise of supported as long as traffic management is controlled and is one of the key decision points in agreement with the local community.</p>	<p>Comments noted.</p> <p>No changes to WGNP.</p>
	<p>6</p>	<p>Representations advise of no preference with respect to conversion. It is consider it could be residential or commercial use, as long as either meets the needs of the village.</p>	<p>Comments noted.</p> <p>No changes to WGNP.</p>
	<p>7</p>	<p>Representations advise of no preference so long as any conversion meets with the requirements of the Parish i.e. suitable housing for young/old.</p>	<p>Comments noted.</p> <p>No changes to WGNP.</p>
	<p>24 (SIGMA Planning Services)</p>	<p>Representations submit Policy 9 makes conversion of redundant farm buildings to residential use a last resort measure. It is considered this is at odds with Government policy.</p> <p>It is considered the Policy runs contrary to Government's objective of boosting supply of housing by taking advantage of all sustainable opportunities to increase the number of new dwellings built or created across the nation.</p> <p>Representations recommends Policy should be amended to put residential re-use on an equal footing with other potential uses of redundant agricultural buildings.</p>	<p>Comments noted.</p> <p>Supporting text updated to reference Permitted Development Rights and emerging Policy 9 of the Local Plan Review.</p>

<p>Policy 9 - Redundant Farm Buildings</p>	<p>25 (Rural Planning Services for Knepp Castle)</p>	<p>Representations advise approach of policy 9 is generally welcomed by the Knepp Castle Estate. It is considered that this policy could also include not only redundant but also disused buildings which is more consistent with the approach taken in the NPPF. It is considered all potential use classes should be considered for redundant and disused rural buildings, depending on the individual merits and circumstances of each case. It is recognised there are now range of permitted development rights available for agricultural buildings to change use to a number of different uses which is not currently acknowledged within Draft Policy 9 at present. Representations advise Knepp Castle Estate are currently working on a project for Swallows Farm. Representations confirm a scheme which is supported by the Parish Council and planning application is due to be submitted shortly.</p>	<p>Comments noted. Supporting text updated to reference Permitted Development Rights and emerging Policy 9 of the Local Plan Review.</p>
<p>Chapter 8 - Transport</p>			
<p>Aim 3 - Roads, Traffic and Congestion</p>			
<p>3</p>	<p>Supported.</p>	<p>Comments noted. No changes to WGNP.</p>	<p>Comments noted. No changes to WGNP.</p>
<p>6</p>	<p>Totally opposed to any pinch points or speed bumps. Representations state this would cause congestion and pollution rather than easing traffic problems. It is submitted Littleworth Lane and South Street cause more pedestrian safety issues than the High Street.</p>	<p>Comments noted. No changes to WGNP.</p>	<p>Comments noted. No changes to WGNP.</p>
<p>7</p>	<p>No to pinch points or speed bumps. Representations state this would Pedestrian safety is more of an issue in Littleworth Lane and South Street.</p>	<p>Comments noted. No changes to WGNP.</p>	<p>Comments noted. No changes to WGNP.</p>
<p>10</p>	<p>Recommend section 5 seek to redesign the junction layout between the B2135 and the A24 through the installation of traffic lights or a roundabout. It is submitted this junction is dangerous and there have been 26 accidents in the past 20 years.</p>	<p>Additional criterion added to Aim 3: Roads, Traffic and Congestion to support improvements to road safety at junction of B2135 and A24.</p>	<p>Additional criterion added to Aim 3: Roads, Traffic and Congestion to support improvements to road safety at junction of B2135 and A24.</p>
<p>Aim 4 - Congestion and Parking</p>			
<p>3</p>	<p>Supported as the High Street around the Co Op and the vets/butchers is permanently a one way system due to parking.</p>	<p>Comments noted. No changes to WGNP.</p>	<p>Comments noted. No changes to WGNP.</p>
<p>6</p>	<p>Representations state they don't often see parking on both sides of the high Street? It is submitted parked cars reduce speed of traffic. Many houses do not have off road parking. More information needed on what you are suggesting. It is submitted cyclists are part of the congestion issue.</p>	<p>Comments noted. No changes to WGNP.</p>	<p>Comments noted. No changes to WGNP.</p>
<p>7</p>	<p>Representations don't agree that there is parking on both sides of the road. Most of the time parking reduces the speed of traffic. It is submitted congestion is at certain times of day. Many houses have no off road parking.</p>	<p>Comments noted. No changes to WGNP.</p>	<p>Comments noted. No changes to WGNP.</p>
<p>6</p>	<p>Representations advise it is considered people should continue to be able to park outside or near their houses. It is submitted more parking should be made available. Lack of public transport means cars are essential. Lack of low cost homes means young adults still live at home, so many houses have multiple cars.</p>	<p>Comments noted. No changes to WGNP.</p>	<p>Comments noted. No changes to WGNP. The policy seeks to support additional parking.</p>

Policy 10 - Car Parking	7	Representations advise it is considered people need to continue to be able to park near or outside their homes. More parking should be made available to deal with family homes with multiple vehicles, which is the norm now due to expensive housing and poor public transport.	Comments noted. No changes to WGNP. The policy seeks to support additional parking.
(WSSC Planning Policy and Infrastructure)	20	Representations advise the loss of a small number of car parking would not be able to be resisted on transport grounds as this would not be in full accordance with the NPPF. WSSC recommend the policy could be reworded to read <u>discouraged</u> instead of resisted.	Comments noted. Policy updated to include the term "discourage" rather than resist to address WSSC concerns.
Aim 5 - Highways and Pedestrian Safety	3	Supported.	Comments noted. No changes to WGNP.
6	No to pinch points or speed bumps. It is submitted car numbers will increase significantly if you build a Hufwood/Star Road, particularly if existing entrance to High St is maintained.	Comments noted. No changes to WGNP.	Comments noted. No changes to WGNP.
7	No pinch points or speed humps. It is submitted building on Hufwood will increase traffic in the High Street and if there is insufficient parking for any new houses parking will be a bigger problem too.	Comments noted. No changes to WGNP.	Comments noted. No changes to WGNP.
(WSSC Planning Policy and Infrastructure)	20 -	It is submitted any traffic calming measures or speed limit changes should be brought forward with WSSC and in accordance with the relevant policies and procedures for implementing traffic calming schemes and speed limit changes.	Supporting text updated to confirm initiative will be brought forward in discussion with WSSC.
Aim 6 - Bus Services	6	Agreed. Preferably also a regular service to Steyning and Shoreham.	Comments noted. No changes to WGNP.
7	Agreed. As well as the existing service a route to Steyning would be beneficial.	Comments noted. No changes to WGNP.	Comments noted. No changes to WGNP.
Aim 7 - Footpaths, Bridleways and Cycleways	3	Support to ensure that local land owners maintain public footpaths across their land i.e. Knepp in winter becomes impossible.	Comments noted. No changes to WGNP.
6	Representations state the Downs Link successfully goes through Southwater and Henfield where there has been building close to it. It is submitted a barrier to slow cyclists at the junction of Downs Link & Sussex Farm is needed for safety.	Comments noted. No changes to WGNP.	Aim 7 (4) and (5) includes protection for the Down Link and includes reference to the pedestrian environment.
7	It is submitted walkers need consideration too. Query why part of the Downs Link can't successfully run past any housing developments as it does already in other places.	Comments noted. No changes to WGNP.	Aim 7 (4) and (5) includes protection for the Down Link and includes reference to the pedestrian environment.

<p>Aim 7 - Footpaths, Bridleways and Cycleways</p>	<p>13 (RPG - Philip Mills)</p>	<p>Countryside & Open Space - It is recommended there is more of an emphasis on the management of footpaths and keeping them clear and well signposted.</p>	<p>Additional criterion to support management of footpaths and keeping these clear and well signposted.</p>
<p>25 (Rural Planning Services for Knepp Castle)</p>	<p>Countryside & Open Space - It is recommended section states 'support businesses that are sympathetic to and complement the rural character of the parish and its roads'. Representations suggest deleting it from here and inserting it in to the economy section.</p>	<p>Comments noted. No changes to WGNP. Comments noted re Strategic Objective 2 included in Chapter 4 Countryside and Open Space. This Strategic Objective is reference at the start of Chapter 7: Economy and therefore do not recommend it is deleted and moved to economy section.</p>	<p>Comments noted. No changes to WGNP. Comments noted re Strategic Objective 2 included in Chapter 4 Countryside and Open Space. This Strategic Objective is reference at the start of Chapter 7: Economy and therefore do not recommend it is deleted and moved to economy section.</p>
<p>20 (WSCC Planning Policy and Infrastructure)</p>	<p>It is suggested that criterion 5 could be expanded further to include the establishment of a cycle/bridleway route from the Downs Link at Partridge Green to Shermanbury. Para 8.17 – the last sentence of this paragraph should read '... that links to the wider public-footpath PROW network.' Para 8.18 – This support could extend to the development of the PROW network, the creation of new routes for non-motorised users, making existing PROW more accessible and the creation of more cycling/ bridleway routes.</p>	<p>Additional criterion to include support for the establishment of a cycle/bridleway route from the Downs Link at Partridge Green to Shermanbury. Final sentence of paragraph 8.17 updated to read: "This is a bridleway, constructed on a former railway line that links to the wider public footpath PROW network." Paragraph 8.18 updated to read: WGFC supports improvements to public pathways and an increase in their accessibility. In addition WGFC supports the development of the PROW network, the creation of new routes for non-motorised users, making existing PROW more accessible and the creation of more cycling/ bridleway routes.</p>	<p>Additional criterion to include support for the establishment of a cycle/bridleway route from the Downs Link at Partridge Green to Shermanbury. Final sentence of paragraph 8.17 updated to read: "This is a bridleway, constructed on a former railway line that links to the wider public footpath PROW network." Paragraph 8.18 updated to read: WGFC supports improvements to public pathways and an increase in their accessibility. In addition WGFC supports the development of the PROW network, the creation of new routes for non-motorised users, making existing PROW more accessible and the creation of more cycling/ bridleway routes.</p>

SA COMMENTS		
Committer No.	Summary of Comments	Updates/Changes to WGNP
<p>24 (SIGMA Planning Services)</p>	<p>Representations advise in order to have tested reasonable alternatives the SA should assess the impact of meeting higher housing needs than those indicated by the District Council in order to consider the ability of the NP area to accommodate more than the minimum housing requirement allocated to it.</p> <p>Representations summaries the Options considered by the Working Group and advise the selection of Option 4 is not explained or justified. Representations note no Sustainability Appraisal of these four options has been provided and it is considered this is a significant flaw in the methodology of the Plan preparation.</p> <p>It is considered the Options should be re-visited with a more robust, practical and realistic assessment of the impacts of alternative options supported by robust evidence by way of justification for the assessments made.</p> <p>With respect to the Appraisal of Aim 2, representations advises the Appraisal upon which the SA is based assures that there are economic and social benefits that outweighs the negative impact. However it is considered those assumptions are illusory and not based upon proper analysis and evidence.</p> <p>It is assumed that there will be no net loss of employment floor-space which is not considered the correct test. It is submitted the correct test is how many of the existing businesses are willing and able to move from Huffwood.</p> <p>Representations state there is no assessment of what happens if only part of the Huffwood Trading Estate is cleared and the aim is frustrated or delayed as a result.</p> <p>It is submitted he significant positive attributed to Option A in the SA is not justified by a simple replacement of existing floor-space unless it can be demonstrated the business performance of the existing business is likely to be significantly improved as a result of a move to new premises.</p>	<p>Comments noted. No changes to WGNP. See updated Submission SA.</p>

9. PREPARATION OF SUBMISSION DOCUMENTS

- 9.1. In light of feedback, the Submission Documents were prepared in January-March 2020.
- 9.2. These were subsequently considered and agreed by WGPC at a meeting on 19 March 2020.

10. SUMMARY

- 10.1. This Consultation Statement sets out how stakeholder engagement has been undertaken in accordance with Regulation 14 and 15 of the Neighbourhood Planning (General) Regulations 2012.
- 10.2. The NPWG have throughout the Plan-making process, sought to engage with local residents and other stakeholders.
- 10.3. Key issues that have been identified through the engagement process have influenced and shaped the Vision, Strategic Objectives, Policies and Aims of the initial and revised WGNP, both the Pre-submission (Regulation 14) and Submission Version (Regulation 16) documents.
- 10.4. In line with Regulation 15(2)(a) and (b) this Statement summarises all stakeholder responses received as part of the consultation and stakeholder engagement exercises; and how the WGNP has changed and evolved in response to Consultation feedback.
- 10.5. Where the WGNP has not been changed as a result of comments made at Regulation 14 stage, an explanation for this has been provided.
- 10.6. This Statement demonstrates that the WGNP has been the subject of robust Consultation and satisfactorily meets the requirements of the Regulations.