

WGPNPWG Policy Background Document Countryside and Open Space - Policy 1: Retention of Local Gaps

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1. Background

The purpose of this document, which has been prepared by members of the West Grinstead Neighbourhood Plan Working Group, is to build upon the existing evidence and justification for the inclusion of Policy 1: Retention of Local Gaps, and to provide the Working Groups's response to representations received. This paper sits alongside (but is separate to) the Local Gaps Policy – Landscape Review carried out by Lizard Landscape Design and Ecology. This policy comes under Section 4 of the pre- submission plan - Countryside and Open Space - and seeks to retain and protect the areas of open land between Partridge Green, Jolesfield and Littleworth and land centred around Jolesfield Common from development, unless the criteria of the policy can be met.

In this section attention is brought to the historical evidence relating to the creation of the separate settlements of Jolesfield, Littleworth and Partridge Green and how their identities have remained unique over the years up to the present day.

a) British History Online (see i) in Appendix) makes reference to a tenement called Jolesfield existing in the late 16th century and relates how buildings in and around Jolesfield Common, including the Green Man inn, sprung up over the ensuing three hundred years. The hamlet of Littleworth began to be established in the late 18th century and small-scale development continued throughout the 19th century. Partridge Green also began to establish its own identity by the 18th century with houses beginning to appear along the strip of land which is now Partridge Green High Street.

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b) There is further information gathered by the West Grinstead Local History group relating to Jolesfield and Littleworth. The original Jolesfield Common was an area of over 70 acres, while according to records on the pews in St. George's church, Midway House, Jolesfield was once 'Shop House, Jolesfield', and operating as a shop for the local neighbourhood in the late 18th century. 'School House', Jolesfield was once Jolesfield School which opened in January 1873. What is now Mill Lane is named after Jolesfield Windmill once situated to the north of the lane, but taken down in 1959. Up until the 1950's the residents of Mill Lane all lived at Jolesfield Common, Mill Lane not being used as an address until then. The hamlet of Littleworth grew up just north of the junction of Mill Lane and what is now Littleworth Lane. An 1805 map shows there was a 'poor house' or parish workhouse in the region of where The Windmill inn now stands. The workhouse was demolished during the late 19th or early 20th century with the remaining bricks and materials being used to build more houses in the vicinity.

c) Today the three settlements of Jolesfield, Partridge Green and Littleworth all retain their separate identities, although it is Partridge Green which has grown most significantly over recent years in terms of size, building and population. Partridge Green has now been designated its own built-up area boundary which gives some definition of where housing stops and the rural areas between Jolesfield and Littleworth begin, although neither Jolesfield or Littleworth have a defined, distinct boundary of their own. Jolesfield is now a small and distinct hamlet of some 25 houses to the north of which Jolesfield House, dating back to 1874 and historically part of the Jolesfield estate, is the southern-most property. The identity of Jolesfield is distinctly rural in comparison with Partridge Green. Littleworth is also a small hamlet of some 20 houses to the north of the junction of Mill Lane and Littleworth Lane with further properties dispersed along Littleworth Lane and Mill Lane. These properties include a number of listed buildings, a terrace of Victorian semi-detached houses and also some more recent residential development set within large garden plots. The focal point of Littleworth is The Windmill pub, named after the former Jolesfield windmill.

2. Planning Policy

a) Reference is made to the Horsham District Planning Framework (HDPF) and the District's planning policy position with respect to anti coalescence gap. Submission is made that the guidelines and directives set out within HDPF Policy 27 are pertinent to the above Policy 1 within the pre-submission plan.

2.1 Horsham District Planning Framework

The Horsham District Planning Framework (HDPF) was adopted in November 2015. It is the overarching planning document for Horsham district outside the South Downs National Park (SDNP) and replaces the Core Strategy and General Development Control Policies documents.

The HDPF includes a Vision and confirms by 2031, Horsham district will have, amongst other matters become a place where:

"The district has retained its remote but not isolated, rural identity and village their separate, distinctive and varied characters which have been able to accommodate appropriate development for local people and to support the community."

The HDPF includes Strategic Policy 27: Settlement Coalescence.

This policy sets out how the District wishes to ensure settlements retain their unique identity and that the undeveloped nature of the landscape between towns and villages is retained.

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The supporting text acknowledges there is a need to retain the network of rural settlements and their separate identities. Furthermore it confirms it is important to contain the rural settlements and retain the sense of leaving one place and arrive at another.

i.e. Paragraph 9.19 states: "There is a need to retain the network of rural settlements and their separate identities, and it is important to contain the rural settlements and retain the sense of leaving one place and arriving at another. There are places where further development in the gap between settlements would result in the areas joining and losing their own individual sense of place. Even where there is countryside between settlements the presence of buildings, signs and other development along roads prevents the sense of leaving a settlement and passing through the countryside. At night various forms of artificial lighting can also lead to a sense of continuous urbanisation."

The supporting text confirms this policy will ensure that settlements retain their unique identity and the undeveloped nature of the landscape between towns and villages will be retained.

i.e. Paragraph 9.20 states: "Whilst the existing situation cannot be addressed by planning policy, further urbanisation can be resisted. This policy will ensure that settlements retain their unique identity and the undeveloped nature of the landscape between towns and villages will be retained. The Council will consider how proposals fit within the wider topography and whether landscape features such as the network of fields, trees and hedgerows are conserved, and therefore maintain the break between settlements. It will also seek to limit other urbanising impacts including increased lighting, traffic movements and ribbon development along road corridors."

Policy 27 states:

"Landscapes will be protected from development which would result in the coalescence of settlements. Development between settlements will be resisted unless it can be demonstrated that:

- *There is no significant reduction in the openness and 'break' between settlements.*
- *It does not generate urbanising effects within the settlement gap, including artificial lighting, development along key road corridors, and traffic movements.*
- *Redevelopment of existing sites that seek to reduce the existing urbanised character and appearance of an area between settlements, particularly along road corridors, will be supported.*
- *Proposals contribute to the conservation, enhancement and amenity of the countryside, including where appropriate enhancements to the Green Infrastructure network or provide opportunities for quiet informal recreation."*

b) It is evident that in essence the District Policy is seeking to ensure settlements retain their unique identity together with the undeveloped nature of the landscape that connects them and although unable to identify specific areas, sets the framework for Neighbourhood Plans to include locally specific gap policies. Therefore, it is the aim of the West Grinstead Neighbourhood Plan (WGNP) to expand and build upon this policy framework by identifying specific local areas which it considers warrant protection. To this effect the WGNP has taken into account the strategic guidance outlined as to where development between settlements will be resisted to ensure the protection of rural settlements and to maintain their identities and how there is a need to retain a network of rural settlements such as these and to avoid the loss of their own individual sense of place. In accordance

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with this policy and to build upon the policy intent the WGNP has identified three separate areas for inclusion as Local Gaps, the details of which follow in Section 3, West Grinstead Gaps. It is considered that development in these gaps would be contrary to HDPF Policy 27 in allowing significant reduction in the openness and break between the settlements of Partridge Green, Jolesfield and Littleworth as well as generating detrimental urbanising effects upon the interconnecting landscape.

c) Reference is also made to the Horsham District Council's Regulation 18 Draft Local Plan Review Consultation (March 2020) and the emerging draft policy position in respect of settlement coalescence. (See strategic policy 29 below).

Strategic Policy 29 - Settlement Coalescence

Horsham District is characterised by rural countryside interspersed with a network of market towns, villages and small hamlets. There is a need to retain the network of rural settlements and their separate identities, and it is important to contain the rural settlements and retain the sense of leaving one place and arriving at another. There are places where further development in the gap between settlements would result in the areas joining and losing their own individual sense of place. Even where there is countryside between settlements, the presence of buildings, signs and other development along roads prevents the sense of leaving a settlement and passing through the countryside. At night, various forms of artificial lighting can also lead to a sense of continuous urbanisation. A particular example is the A264 between north eastern edge of Horsham and Crawley. Other communities in the district have raised concerns about the potential for other settlements to merge, including Southwater and Horsham, and West Chiltington Common with West Chiltington Village.

Whilst the existing situation cannot be addressed by planning policy, further urbanisation can be resisted. This policy will ensure that settlements retain their unique identity and the undeveloped nature of the landscape between towns and villages will be retained. The Council will consider how proposals fit within the wider topography and whether landscape features such as the network of fields, trees and hedgerows are conserved, and therefore maintain the break between settlements. We will also seek to limit other urbanising impacts including increased lighting, traffic movements and ribbon development along road corridors. It should be noted that this policy applies to all settlements, but particular regard to the policy criteria will be given when considering proposals located between Horsham and Crawley, Southwater and Horsham, or West Chiltington Common and West Chiltington Village.

It is recognised that a number of proposals have been submitted to the Council for consideration as locations for strategic housing growth. A number of these are in the key locations which have been identified as being most sensitive for their potential for settlement coalescence. Whilst no final decisions have been made as to whether these sites should be allocated, the sites are in locations where there has been sustained pressure for development. Paragraph 72 e of the National Planning Policy Framework states that when identifying suitable and sustainable locations for development they should consider whether it is appropriate to establish Green Belt around or adjoining new developments of a significant size. Therefore, as part of our consideration of these sites, will look at whether any locations in the District meet the criteria for Green Belt designation, which are set out in paragraph 135 of the NPPF.

Any proposals would require the Council to:

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- a) demonstrate why normal planning and development management policies would not be adequate;
- b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- c) show what the consequences of the proposal would be for sustainable development;
- d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and
- e) show how the Green Belt would meet the other objectives of the Framework.

Strategic Policy 29: Settlement Coalescence

Landscapes will be protected from development which would result in the coalescence of settlements in order to protect local identity and a sense of place. Development between settlements will be resisted unless it can be demonstrated that:

- a) There is no significant reduction in the openness and 'break' between settlements;
- b) It does not generate urbanising effects within the retained 'break' between settlements, including artificial lighting, development along and/or the widening of the roads between the settlements; and increased traffic movements.
- c) Proposals respect the landscape and contribute to the enhancement of their countryside setting, including, where appropriate, enhancements to the Green Infrastructure network, the Nature Recovery Network and/or provide opportunities for quiet informal countryside recreation.

Redevelopment of existing sites that seek to reduce the existing urbanised character and appearance of an area between settlements, particularly along road corridors, will be supported.

2.2 National Planning Policy Framework

Reference is made to the Appraisal of Higher Tier Guidance (National and Strategic) on the use of Gap Policies.

One of the core principles in the National Planning Policy Framework (NPPF) is that planning should recognise the intrinsic character and beauty of the countryside.

Paragraph 170 states planning policies and decisions should contribute to, and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water

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- quality, taking into account relevant information such as river basin management plans; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Paragraph 171 states plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in the NPPF; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across Local Authority boundaries.

Paragraph 172 states great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Minimising impacts on, and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

National Planning Policy Guidance (NPPG) advises Local Plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes, but also the wider countryside.

In addition, the NPPG advises, where appropriate, Landscape Character Assessments should be prepared to complement Natural England's National Character Area profiles.

The NPPG advises Landscape Character Assessment is a tool to help understand the character and local distinctiveness of the landscape, and identify the features that give it a sense of place. It can help to inform, plan, and manage change, and may be undertaken at a scale appropriate to Local and Neighbourhood Plan-Making. 1

2.3 Reference is made to the appraisal of other examples of Neighbourhood Plan Gap Policies and feedback from relevant examination.

As part of the preparation of the revised background paper, a review of Neighbourhood Plans has been undertaken to appraise other neighbourhood plans gap policies.

Set out below is a summary of the Examiner's feedback on proposed local gap policies in Neighbourhood Plans in the following areas:

- Hurstpierpoint and Sayers Common;
- Ditchling, Westmeston & Streat
- Thakeham; and
- Storrington, Sullington and Washington.
- Hassocks
- Hook

The Hurstpierpoint and Sayers Common Parish Neighbourhood Plan (HSCNP) was made in March 2015. It covers the period 2014 to 2031.

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The Submission HSCNP proposed to include Policy C3: Local Gaps and Preventing Coalescence, which defines Local Gaps and seeks to prevent coalescence.

As part of the Examination of the HSCNP, the Examiner considered whether the Policy met the Basic Conditions.

Set out below is an extract of the Examiner's Report in respect of Policy C3:

"Mid Sussex Local Plan Policy C3 identifies areas of countryside that are particularly vulnerable to development pressure, but which have an important function with regards protecting local character.

Neighbourhood Plan Policy C3 permits development in the countryside, subject to it not resulting in coalescence or the loss of identity of neighbouring settlements. This approach is in general conformity with Mid Sussex Local Plan Policy C3.

Further to testing and robust consultation, it reflects the local community's strong support for the vision for the Neighbourhood Area, which seeks to retain a "village feel" and sense of place. This has regard to the Framework, which gives communities direct power to develop a shared vision for their neighbourhood.

The policy contributes to the achievement of sustainable development by protecting local character and supporting appropriate development. No modifications are proposed."

In light of the Examiners Report, Policy C3 forms part of the "made" HSCNP. The Policy, seeks to resist development which individually or cumulatively results in the coalescence and loss of separate identity of neighbouring settlements. In addition, it identifies local between settlements to be protected.

The policy states:

"Development will be permitted in the countryside provided that it does not individually or cumulatively result in coalescence and loss of separate identity of neighbouring settlements, and provided that it does not conflict with other Countryside policies in this Plan. Local Gaps between the following settlements define those areas covered by this policy:

Hurstpierpoint and Hassocks; Sayers Common and Albourne; Hurstpierpoint and Albourne; Hurstpierpoint and Burgess Hill."

The Ditchling, Westmeston & Streat Neighbourhood Plan (DWSNP) was made in May 2018.

The Submission DWSNP proposed to include CONS 8: Protect important gaps between settlements. The Policy seeks to prevent coalescence between Ditchling and the larger settlements of Keymer/Hassocks and Burgess Hill and to protect the local gap which separates them.

As part of the Examination of the DWSNP, the Examiner considered whether the Policy met the Basic Conditions.

2 Hurstpierpoint and Sayers Common, Examiners Report, September 2014, page 18

3 Hurstpierpoint & Sayer Common Parish Council, Parish 2031 Neighbourhood Plan, Policy Countryside Hurst C3 Local Gaps and Preventing Coalescence

4 Ditchling, Westmeston & Streat Neighbourhood Plan, Examiner's Report, January 2018, paragraph 83

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With respect to CONS 8, the Examiner advised:

“The policy and its supporting text are appropriate. An amendment to the last sentence of the policy is desirable in the interests of clarity.

I Recommend: amend the final sentence of the policy to refer to the “South Downs Integrated Landscape Character Assessment and relevant local landscape character assessments”.

In light of the Examiners Report, Policy CONS 7: Protect important gaps between settlements forms part of the “made” DWSNP. The Policy seeks to support proposals for new development in the gap separating Ditchling and Hassocks/Keymer and Burgess Hill, either individually or cumulatively, where they conserve and where possible enhance the open landscape character of the gap, and do not reduce the physical gap between settlements.

The policy states:

“Development proposals for new development in the gap separating Ditchling and Hassocks/ Keymer and Burgess Hill, either individually or cumulatively, will only be supported where they conserve and where possible enhance the open landscape character of the gap, and do not reduce the physical gap between settlements. This will be informed by the South Downs Integrated Landscape Character Assessment and relevant local landscape character assessments.”

The Thakeham Neighbourhood Plan (TNP) was made in April 2017. It covers the period 2017-2031. The Submission Thakeham TNP proposed 4 Green Gaps known as Gaps: A; B; C; and D as part of Policy of the TNP.

As part of the Examination of the TNP, the Examiner considered whether the inclusion of four ‘green gaps’ in Policy 1 is adequately justified and whether the areas (marked A-D) on the Policies Map are sufficiently clearly defined.

The Examiner’s Report, advised:

“Policy 1 of the TNP states that ‘proposals must not undermine the visual and physical integrity of the gaps between the built-up areas of ...’ and then names the adjacent parishes. In addition, the Report advises the supporting text in paragraph 4.17 of the TNP does little more to expand or justify this policy approach except that it clarifies that one of the areas is ‘between the two halves of the village’ (of Thakeham).”

In light of this, the Examiner’s Report stated:

“there is no robust evidence to support the policy which would impose a significant constraint on development, contrary to national policy”.

In addition, the Report advised:

“it is also not clear what account has been taken of HDPF Policy 27 which provides a clear criteria-based policy for the consideration of development proposals which would lead to ‘settlement coalescence’. 6

5 Ditchling, Westmeston & Streat Neighbourhood Plan, April 2018, CONS 7 Protect important gaps between settlements 6 Thakeham Parish Neighbourhood Plan to 2031, Examiner’s Report, November 2016, paragraph 3.30

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In response to queries raised by the Examiner in respect of the proposed gaps, Thakeham Parish Council (TPC) submitted a response to matters raised. The Examiner's Report confirms TPC provided a "good deal more information on the background and justification for two of the green gaps":

"Area A between the High Bar Lane area of Thakeham and West Chiltington (parish boundary); and Area B which represents the gap, to the east of the B2139, between 'The Street' part of Thakeham and the new development at Abingworth Nursery."

No further evidence was submitted in support of Area C and D. Given the lack of evidence, the Examiner concluded Area C and D are inadequately justified in the face of Government policy and therefore recommended the deletion of these areas.

With respect to Area A, TPC provided a further description of the nature and function of the strip of countryside to the west of High Bar Lane to the boundary with West Chiltington parish (West Chiltington Common).

The Examiner's Report confirms:

"a site for housing has been evaluated in the site assessment report but it is confined to the frontage to Threal's Lane with the woodland of High Bar Copse to the east so that, even if developed it would not lead to the coalescence of High Bar Lane with West Chiltington."

For these reasons, the Examiner considered that the designation of a 'green gap' in this location (Area A) serves little practicable value in preventing the two settlements from merging and that the application of normal countryside policies would suffice, including the application of the criteria in HDPF Policy 27.

With respect to Area B, the Examiner advised:

"The development taking place at Abingworth Nursery will significantly alter the appearance of that area and reduce the openness of the area to the east of the B2139. I accept that there are local circumstances which justify a policy which seeks to prevent any coalescence between the new development and the old Thakeham village 'The Street' BUAB to the north. It is a local priority over and above the more strategic approach taken through HDPF Policy 27. The approach taken remains in general conformity with the HDPF. On the Policies Map, for the area to which the policy applies to clearly relate to features on the ground, the yellow colouring should extend to the field boundaries in the south-east corner".

In light of the Examiner's Report, Policy 1 forms part of the TNP.

The made TNP, January 2017, includes Thakeham 1: A Spatial Plan for the Parish. The policy, amongst other matters, identifies a green gap between Thakeham village ('The Street') and the new development at Abingworth Nurseries. The gap is indicated on the Policies Map as Green Gap A- The Street-High Bar Lane.

7 Thakeham Parish Neighbourhood Plan to 2031, Examiner's Report, November 2016, paragraph 3.32
8 Thakeham Parish Neighbourhood Plan to 2031, Examiner's Report, November 2016, paragraph 3.34
9 Thakeham Parish Neighbourhood Plan to 2031, Examiner's Report, November 2016, paragraph 3.33

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The Policy seeks to prevent development in the gap and states:

“Proposals must not undermine the visual and physical integrity of the gap between the built-up area of Thakeham (‘The Street’) and the new development at Abingworth Nurseries as identified on the Policies Map”.

The Storrington, Sullington & Washington Neighbourhood Plan (SSWNP) has recently undergone Examination.

The Submission SSWNP, included Policy 9: Green Gaps. The objective of the policy was to identify particular areas that, if developed, could lead to coalescence between settlements.

The Examiner published issued “Initial Comments” in May 2018, which concentrated on the status of the qualifying body (QB). Further initial comments were published in June 2018, which advised the Examiner had concluded a hearing, dealing with some specific issues, would be beneficial. In addition, the Examiner advised of some issues which could be dealt with by an exchange of written representations.

Matters which the Examiner considered could be dealt by way of written submissions, included Policy 9: Green Gaps.

With respect to Policy 9, the Examiners advised that the Plan indicates:

“the broad location of green gaps between Storrington and Sullington and Washington villages and between the 2 parishes and neighbouring parishes. I have not seen where these green gaps have been identified and the extent of the green gaps needs to be shown on a plan.”

The Examiner invited the QB to work with the LPA with a view to producing maps for examination that address these concerns. In response a Map was prepared to confirm the SSWNP Green Gaps and Views.

The Examiner’s Report was published in November 2018. This included a number of recommended changes to the SSWNP in order for the Plan to meet the Basic Conditions.

With respect to Policy 9, the Examiner’s Report advised:

“I was initially concerned that the policy as written was too vague as it stated that the ‘Neighbourhood Plan identifies the broad location of green gaps between Storrington and Sullington and Washington Village and between these two parishes and other neighbouring parishes.’ It did not do that.”

In addition, the Examiner’s Report advised:

“It is important to recognise that this is not a general countryside protection policy, but a policy which is to protect especially vulnerable areas from built development. The Qualifying Body has produced a Green Gaps and Views Plan. It appears to identify a significant number of green gaps

10 Thakeham Parish Neighbourhood Plan to 2031, January 2017, Thakeham1: A Spatial Plan for the Parish

11 Storrington, Sullington and Washington Neighbourhood Plan, Further initial comments of the Independent Examiner, June 2018

12 Storrington, Sullington and Washington Neighbourhood Plan 2018-2031, Examiner’s Report, November 2018, paragraph 117

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where there is no chance of settlement coalescence, because there are no settlements to be coalesced with. The only "corridor" which I consider could be at risk of coalescence is between the northern edge of Storrington and West Chiltington. This gap would have the support of the West Chiltington PC".

The Examiner's Report included a number of recommended modifications which the Examiner considers are required to ensure the plan meets the Basic Conditions. This included, but is not limited to:

*Reduce the number of green gaps to just one, between Storrington and West Chiltington*¹⁴.

In light of the Examiner's recommended modifications, HDC consulted on Modifications (including the modifications to Policy 9) during February-March 2019.

The consultation documents confirmed it was proposed Policy 9 would be amended to read:

"Development between Storrington and West Chiltington will be resisted in line with Policy 27 of the Horsham District Planning Framework which seeks to prevent the coalescence of rural settlements."

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Following the close of the consultation, HDC published the Decision Statement on 01 May 2019. This confirms:

"All representations received have been considered and Horsham District Council has reached the conclusion no further examination is required in relation to the changes proposed by Horsham District Council in response to the Examiner's recommendations. In all other respects the Council remains in agreement with the Examiner's recommendations and it is therefore considered that the Storrington, Sullington and Washington Neighbourhood Plan meets the Basic Conditions and should proceed to referendum within accepted timescales".

The SSWNP successfully passed Referendum on 18 July 2019. On 4 September 2019, HDC resolved at Full Council that SSWNP (incorporating the Examiners modifications and all modifications as per the HDC Decision Statement), should be 'made' and become part of the Development Plan for HDC.

The SSWNP was made with effect 5 September 2019.

Policies Map Inset 6 illustrates the extent of Policy 9: Green Gap. The policy states: *"development between Storrington and West Chiltington will be resisted in line with Policy 27 of the Horsham District Planning Framework which seeks to prevent the coalescence of rural settlements"*

Hassocks Neighbourhood Plan

The Hassocks Neighbourhood Plan has recently undergone examination and was recently passed at referendum on March 5th 2020.

¹³Storrington, Sullington and Washington Neighbourhood Plan 2018-2031, Examiner's Report, November 2018, paragraph

¹⁴ 14 Storrington, Sullington and Washington Neighbourhood Plan 2018-2031, Examiner's Report, November 2018

¹⁵ 15 Modifications to the Submission Storrington, Sullington and Washington Neighbourhood Plan 2018-2031

¹⁶ 16 Horsham District Council, Decision Statement, May 2019

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The Examiner's Report on the Hassocks Neighbourhood Development Plan 2014-2031 was published in October 2019. In regard to Policy 1: Local Gaps the Examiner's advice can be seen below: ref. Pages 20-25 of the report.

Policy 1: Local Gaps

This policy sits at the heart of the Plan. It proposes the definition of three local gaps as follows:

- Keymer/Hassocks and Ditchling;
- Keymer/Hassocks and Hurstpierpoint; and
- Keymer/Hassocks and Burgess Hill

The purpose of the definition of local gaps is to prevent coalescence and to retain the separate identity and amenity of the settlements concerned. The policy then identifies the types of development that would be supported within the defined Local Gaps. The supporting text (paragraph 4.1 to 4.14) provides a comprehensive context to this matter. It is also underpinned by background papers. The proposed Local Gaps are drawn tightly around the edges of Hassocks. In most cases the inner boundaries of the Local Gaps follow the defined built up area boundary for Hassocks in the adopted District Plan.

The policy approach included in the submitted neighbourhood plan seeks to follow the approach to local gaps set out in Policy DP13 of the adopted Mid Sussex District Plan. It is conveniently summarised in paragraph 4.9 of the Plan. That paragraph describes the way in which the Plan has sought to provide robust evidence to identify local gaps and to demonstrate that existing local and national policies cannot provide the necessary protection. The SDNPA has also made comments about the way in which the proposed policy would apply in the National Park. In particular it draws attention to the second criterion of the policy which itself refers to Policy DP6 of the District Plan. Plainly that policy does not apply in the National Park.

The supporting text to Policy DP13 of the District Plan comments that the settlement pattern of Mid Sussex makes an important contribution to its distinctive character. As such a strategic objective of that Plan is to promote well-located and designed development that reflects the distinctive towns and villages, retains their separate identity and character and prevents coalescence.

The approach in Policy DP13 supplements that included in Policy DP12 which refers more generally to the protection and enhancement of the countryside. The supporting text to this policy comments that 'the primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there. At the same time, it seeks to enhance the countryside, support the rural economy by accommodating well-designed, appropriate new forms of development and changes in land use where a countryside location is required and where it does not adversely affect the rural environment. New development to meet local needs can be proposed through Neighbourhood Plans where this will support local services and is otherwise compatible with District Plan policies'

The Parish Council has approached its proposed identification of Local Gaps within this broader context. In doing so it has produced a landscape assessment. It reflects the approach in the District Plan supporting text which comments that the Strategy for the West Sussex Landscape (2005, paragraph 2.5) identifies the settlement pattern of the County – a network of small to medium-sized towns, villages and hamlets – as a strong defining characteristic.

In addition the Parish Council has prepared a separate document – Review of Policy 1: Local Gaps. This document takes account of the comments received to the pre-submission Plan. I summarise the findings of these documents in the following sections of this report

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A Landscape Character Assessment was prepared as a supporting document for the emerging neighbourhood plan in March 2015. Whilst it does not make any specific recommendations for the definition of Local Gaps it provides detailed evidence on the character and appearance of those parts of the neighbourhood area outside Hassocks and provides a context within which the various parcels of land have been assessed for this purpose. The Assessment clarifies that its ambition is to provide a more local iteration of the Mid Sussex Landscape Character Assessment.

The Review document summarises the findings of the landscape assessment work. In particular it provides an update on national and local policy as it has developed in recent years. In addition, it reviews the comments that were received during the most recent pre-submission phase of the Plan. It also assesses those parts of the neighbourhood area where proposals have come forward for development and which may, individually and cumulatively reduce the separation between the settlements concerned. As an outcome it identifies areas where proposed Local Gaps could be reduced in their size from those included in earlier versions. These findings were translated into the submission Plan.

The policy has attracted a series of representations from the development industry. In summary they are as follows:

Clayton with Keymer Parish Council and the Chichester Diocese – detailed comments are made about the wording of Policy 1 and its requirement for an ‘appropriate landscape buffer’ where any proposed housing schemes are in accordance with Policy DP6 of the adopted District Plan. The representation proposes an additional housing site to the west of London Road.

Gladman Developments Limited – detailed comments are made about the relationship of the proposed policy both to the adopted District Plan, and to national policy. It also comments about the scale and nature of the evidence presented in the Plan. It suggests that if the policy is retained its wording should be modified so that it allows an appropriate balancing act to take place when determining planning applications in the affected areas.

Colin Brace and Philip Harris – detailed comments are made about the proposed size of the Keymer/Hassocks to Burgess Hill Local Gap. In particular the representation suggests that there should be a balance between the definition of a proposed Local Gap to the west and to the east of London Road. It proposes a further housing site in the neighbourhood area on the eastern side of London Road to the north of the Friars Oak PH.

Rydon Homes – makes detailed comments about the planning history on the site in which it has an interest to the east of the Friars Oak PH off London Road. It also comments about the integrity of the policy and suggests that it is either deleted or that the proposed Local Gaps are reduced to area which are necessary to prevent coalescence between the settlements concerned.

BasicPause Limited – makes detailed comments about the way in which the proposed policy approach relates to national and local policy and thereby to the basic conditions. It makes specific comments about the extent to which the policy fails to address the need for rural economic development in the neighbourhood area.

Globe Homes – makes detailed comments about a parcel of land to the rear of 2 Hurst Road and to the west of London Road. It contends that the parcel of land is now heavily influenced by the development of the adjacent Barratt Homes development to the north. It asserts that its removal from the Local Gap would not have any significant effect on the wider policy approach or the wider objectives of the adopted District Plan.

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The policy itself identifies the proposed local gaps and comments about the types of development which would be supported in the designated areas. It overlaps with Policy DP6 of the adopted District Plan. Its overall ambition is to safeguard the integrity of the three proposed gaps.

I have also taken account of two changes in circumstances that have taken place since the consultation process ended. The first is that planning permission has been granted for the development of 130 houses on land to the rear (north and east) of the Friar Oak PH, London Road Hassocks. That site is within the proposed Hassocks/Keymer to Burgess Hill Local Gap. The second is that the same site is proposed as a housing allocation (SA24) in the Regulation 18 Consultation Draft Mid Sussex Site Allocations Development Plan Document (October 2019).

Taking all the information into account I am satisfied that there is a case for the designation of Local Gaps in the neighbourhood area. In particular I am satisfied that, on balance, the Parish Council has submitted robust evidence to justify this approach and as required by Policy DP13 of the adopted District Plan. It has assessed the landscape nature of the countryside and related it to the original work undertaken by MSDC in preparing the former 2004 Local Plan. It has assessed the scale and nature of the planning permissions and development pressures that now exist in the neighbourhood area in general, and with the allocation of the strategic site in the adopted District Plan in particular.

As highlighted earlier in this report circumstances have changed further since the submission of the Plan and the comments made to that Plan. In particular the parcel of land to the east of Friars Oak now benefits from planning permission for residential development. It is also allocated for development in the emerging Site Allocations DPD. Plainly this has a direct impact on the proposed identification of the Hassocks- Burgess Hill Local Gap. In a wider context it also has two related consequences. Firstly, it provides clarity on the scale, the nature and the location of allocated and committed housing sites in the neighbourhood area. Secondly it reinforces the sensitivity and the reduced nature of the open countryside between Hassocks/Keymer and the three settlements to the north west and east to further development within the Plan period. This change has been most noticeable in the proposed Hassock-Burgess Hill in general, and to the immediate north of the built-up area boundary of Hassocks in particular.

In coming to decisions on the strategic site at Clayton Mills and the recent planning appeal on the Friars Oak site planning inspectors have concluded that the sites would not significantly conflict with the separation that exists between Hassocks and Burgess Hill. In the anticipation that the two sites will come forward within the Plan period together with other committed sites I am satisfied that the scale and nature of the residual land between Hassocks and Burgess Hill would be of a residual scale to warrant the definition of a Local Gap. This is particularly relevant given the development pressures arising in the southern part of this local gap (that is to the immediate north of Hassocks) However in this context I recommend a series of modifications to the policy so that it has regard to national policy. In particular they relate to the following matters:

- the wording used in the policy in general, and the lack of any direct reference to the South Downs National Park in particular;
- the way in which the policy tackles economic development and tourism activities; and
- the way in which the policy would be applied to sites which immediately adjoin the built-up area boundary.

On the first matter the submitted policy takes an approach which defines the types of development which would be supported in a Local Gap. In summary they are agricultural uses, other uses which 'have to be located in the countryside' and a housing proposal that would be in accordance with Policy DP6 (1-3) of the adopted District Plan. That policy relates to housing proposals outside any defined built-up area boundary.

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In this context I recommend three modifications to the wording used in the policy. The first brings clarity to that part of the first criterion which refers loosely to 'some other use which has to be located in the countryside'. As submitted, this does not have the clarity required by the NPPF. Neither MSDC nor a developer would immediately understand how this aspect of the policy would be applied. The second relates to the requirement for a landscape buffer to be associated with any proposed housing schemes. In this regard the need or otherwise for landscaping of whatever type would be a matter of judgement for MSDC.

The third incorporates reference to the appropriate policy in the South Downs Local Plan insofar as that policy would apply within elements of the various Local Gaps which fall within the National Park.

The second matter overlaps with the first matter. National policy offers support for sensitive economic development and tourism activities within the countryside. It also offers specific support to any such proposals which may involve the re-use of existing buildings. I recommend that this issue is reflected in the supporting text. There is no reason why such uses cannot be satisfactorily accommodated in the proposed Local Gaps without undermining their principal purpose of retaining the separation of settlements and preventing coalescence. The recommended modification to the policy itself appropriately addresses this issue in a general way.

The third matter seeks to take account of particular circumstances which have been brought forward in two representations on this policy where the parcel of land concerned immediately adjoins the identified BUAB. The first relates to Globe Homes representation on the parcel of land to the rear of 2 Hurst Road and to the west of London Road. In this case it is surrounded by built development on three sides. In particular the recent development of the Barratt Homes development to its north has separated it from the bulk of the proposed Local Gap to the north. The second relates to land at The Paddock and Evergreen to the north of the Friar Oak PH. In both cases the representations comment that the sites should be included for residential development, and that their development can be accommodated without impacting on the separation between Hassocks and Burgess Hill.

Both sites have been assessed for the potential for development as part of the preparation of the emerging Site Allocations DPD. They are not proposed for development in that Plan. For the purpose of this examination my role is simply to assess the appropriateness of its inclusion within the proposed Local Gap.

I have given careful thought to the appropriateness or otherwise of recommending the removal of these parcel of land from the proposed Local Gap. On the one hand to do so would take account of their changed circumstances since the development of the Barratt Homes site and the emerging Golf Course site off London Road. On the other hand, such an approach would depart from the approach taken elsewhere in the Plan of having a common boundary for the relevant Hassocks built up area boundary and the relevant Local Gap.

On the balance of the issues I am satisfied that the sites concerned should remain within the proposed Local Gap. In any event the appropriate mechanism for the potential development of the sites is the emerging Site Allocations DPD. The sites have already been assessed and the owners have the potential to pursue the sites through that process as they see fit.

In a broader context I also recommend detailed modifications to the wording used in paragraph 4.14. In particular the submitted text's use of 'keep these areas free from development in the longer term' is at odds with the specific support to development in the policy itself. In addition, it fails to take account of the 'Plan period' in its rather loose use of 'the longer term'.

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I recommend that the parcels of land to the north of Shepherds Walk as now approved for residential development are excluded from the proposed Hassocks to Burgess Hill Local Gap. This matter is detailed on the map at Appendix 1 of this report.

In criterion 1 replace 'or some other.... countryside' with 'or other uses which accord with national and local policies for the use of land and buildings in the countryside'

In criterion 2

- add 'or Policy SD25 of the South Downs Local Plan as appropriate to the location of the proposed development'
- delete 'and...Local Gap'
- *In paragraph 4.14 (second sentence) replace 'keep these areas.... Local Gap' with 'ensure that development in these areas is restricted to that which would be appropriate to safeguard the separation of the settlements concerned whilst ensuring that sustainable development take place within the Plan period*
- *At the end of paragraph 4.14 add: The policy identifies specific types of development which would be supported within the identified Local Gaps. It seeks to balance the need for policy clarity on the one hand with facilitating the sustainable use of land and buildings in the countryside. This is particularly reflected in the two criteria in the policy. The boundaries of the Local Gaps where they adjoin Hassocks/Keymer are mostly common with the built-up area boundary of the village. Development proposals which may arise in a Local Gap immediately adjacent to built-up area boundary will be determined against both Policy DP6 of the adopted District Plan, Policy SD25 of the South Downs Local Plan and Policy 1 of the HNP. Whilst these policies overlap Policy 1 of this Plan would have a particular focus on ensuring that the proposal would not compromise the integrity of the Local Gap concerned.*
- *Remove the parcel of land within the application site of planning application DM/19/1897 and DM/18/2342 from the Hassocks - Burgess Hill Local Gap and as shown in Appendix 1.*

Hook Neighbourhood Plan 2018-2032

The Hook Neighbourhood Plan was made in October 2019.

The Examiner's Report on the Hook Neighbourhood Plan 2018-2032 was published in July 2019. In regard to Policy HK6: Hook to Newnham Gap the Examiner's advice can be seen below: ref. Pages 28-29 of the report.

Examiner's Report July 2019

Policy HK6: Hook to Newnham Gap

Local Plan Policies CON19 ("Strategic Gaps – General Policy") and CON21 ("Local Gaps") provide protection from inappropriate development within gaps that separate settlements from one another. Policy CON21 includes a gap between Hook and Newnham.

Policy HK6 seeks to maintain a gap between Hook and Newnham, in order to prevent the physical and visual coalescence of the two settlements. In this respect, Policy HK6 is in general conformity with the Local Plan.

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Whilst I note that a representation has been made in respect of the fact that the emerging Local Plan might not include a gap between these two settlements, the emerging Local Plan is precisely that. It is not an adopted document and its precise final content is, as yet, unknown. The Neighbourhood Plan is not examined against emerging planning policy.

Whilst the adopted Local Gap policies in the Local Plan pre-date the publication of the first Framework in 2012, I note that a Planning Inspector, in dismissing a planning appeal a number of years after the publication of the Framework¹⁴ referred to the development proposal as having an adverse impact on the Local Gap between Hook and Newnham. The Inspector did not consider the Local Gap policy to run counter to the requirements of national policy and national policy, in the form of the Framework against which this Neighbourhood Plan must be examined states that planning policies should contribute to and enhance the natural and local environment by:

“...recognising the intrinsic character and beauty of the countryside...” (Paragraph 170, the Framework)

The supporting text for Policy HK6 identifies the important role of the countryside around Hook in respect of, amongst other things, defining local character, providing open space and supporting wildlife.

The precise boundary of the gap shown on Figure 8.13.1 has emerged through the plan-making process and I note earlier in this Report that the Neighbourhood Plan was supported by an appropriate consultation process.

Paragraph 29 of the Framework gives communities the power to develop a shared vision for their area and the community has sought to maintain an important gap between Hook and Newnham. The submitted information provides evidence in respect of how the boundaries of the proposed gap, supported by the community, were determined.

There is no requirement for the Neighbourhood Plan to allocate land for development and there is no substantive evidence before me to demonstrate that maintaining a gap between Hook and Newnham would, in itself, mean that Hart District would be prevented from providing housing land to meet its needs, or would necessarily result in the Neighbourhood Plan failing to contribute to sustainable development.

The wording of the Policy includes a vague reference to *“proposed”* developments and fails to provide for the balanced consideration of harm and benefits, as required in order for the Neighbourhood Plan to contribute to the achievement of sustainable development. These are matters addressed in the recommendations below.

The final sentence of Paragraph 8.14 reads as a policy, which it is not.

- Policy HK6, change wording to *“...on Fig 8.13.1 should not lead to the physical or visual coalescence of these villages or damage their separate identity.”* Delete rest of Policy
- Delete last sentence of Paragraph 8.14 (*“Development in the...identify.”*)
- Delete Paragraph 8.16 which is not relevant to the Policy

¹⁴ Reference: APP/N1730/A/14/2226609.

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As a result of this appraisal of other examples of Neighbourhood Plan Gap Policies and feedback from relevant examination, the wording of Policy 1 - Retention of Local Gaps - Point 1 - was changed to:

1. There is no significant reduction in the openness and break between settlements.

3. West Grinstead Local Gaps

There are three separate areas that have been identified for inclusion as Local Gaps and for identification purposes they have been given the references LG1 (land north of The Rise), LG2 (land situated in and around Jolesfield Common) and LG3 (land north of The Rosary). (Please see ii) Map of WGNP Local Gaps in Appendix). The general reasoning for this is because all three sites border the northern Partridge Green BUAB and at present act as buffers between the Partridge Green BUAB and the surrounding countryside towards the settlements of Jolesfield and Littleworth. The sites constitute a network of fields, trees and hedgerows which maintain the break between these settlements and prevent them from joining. This section highlights why these gaps are considered special and warrant protection in regard to landscape value and landscape capacity as identified via assessments carried out by Horsham District Council, West Sussex County Council and West Grinstead Parish Council. In addition the Working Group have commissioned a third party Landscape Review Report of the Local Gaps Policy carried out by Lizard Landscape Design and Ecology (LLD). LLD carried out a review of Horsham District Council's Landscape Capacity Assessment (2014). The Capacity Study for LG1 (land north of the Rise) and LG2 (land situated in and around Jolesfield Common) comes under Landscape Study Area PG1 and LLD's review of these two sites can be found on pages 5-6, paras. 3.1 -3.10 of the report. The Capacity Study for LG3 (land north of The Rosary) comes under Landscape Study Area PG4 and a review of this site can be found on pages 7-8 paras. 3.11-3.15.

a) Landscape Value

The settlements of Partridge Green, Jolesfield and Littleworth were included within Area J3: Cowfold and Shermanbury Farmlands of the Horsham District Council Landscape Character Assessment 2003, which covered the eastern part of the Parish (see iii) in Appendix). This historic landscape is identified by localised areas of open agricultural character and low settlement density. All three of these sites fall within those boundaries and possess a number of characteristics of landscape value referred to in the Assessment. The areas generally have an undeveloped rural character with a number of historic features, including small-scale intricate field patterns of pasture while LG2 also has some larger scale arable fields. The presence of small fields first cleared from historical woodland (assarts), probably in medieval times and accompanied by historic shaws and hedgerows formed following the clearance of the assarts and woodland trees, creates enclosure and restricts views. A key issue in the Assessment is loss of species-rich hedgerows and shaws, so from both a historical and biodiversity perspective their presence on these sites makes their protection important. Another key issue is given as suburban development at Partridge Green and suburbanisation on main road routes; by protecting these gaps it would be able to prevent further suburbanisation, especially along the B2135, a main road route that borders sites LG2 and LG3.

Under the Assessment's Planning and Land Management Guidelines attention is brought to the importance given to conserving the rural undeveloped nature of the landscape and how these

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characteristics can be damaged by large-scale housing. The Guidelines also refer to the need to respect historic settlement patterns and how development in rural areas should seek to retain a sense of identity and separation between settlements.

Submission is made that these assessments and guidelines support the policy of maintaining local gaps on these sites; the key points as to why it is important to maintain these local gaps and keep them protected are:

- i) to conserve the rural undeveloped character of the parish by preventing large scale housing
- ii) to maintain historic features
- iii) to prevent further suburbanisation of Partridge Green
- iv) to ensure any appropriate development responds to historic settlement patterns
- v) to retain a sense of identity and separateness between the settlements of Partridge Green, Jolesfield and Littleworth

Reference is also made to The West Sussex Landscape Character Assessment 2003 (unpublished) and the West Sussex Land Management Guidelines which followed on from that assessment which identified Partridge Green, Jolesfield and Littleworth as being within the Eastern Low Weald LW10 (Appendix 2). (See iv) in Appendix.)

The key landscape characteristics, issues and landscape and visual sensitivities of the Eastern Low Weald, as they relate to Partridge Green, Jolesfield and Littleworth and therefore the West Grinstead Gaps can be summarised as follows. An arable and pastoral rural landscape with a mosaic of small and larger fields, scattered woodlands, shaws and hedgerows with hedgerow trees. There are varied traditional rural buildings with diverse materials including timber framing, while historic features include historic country houses and farmsteads. The woodland cover and the mosaic of shaws and hedgerows contribute strongly to the essence of the landscape, giving a high level of perceived naturalness and a rural quality in the quieter rural landscape to the west. All these features are relevant to the West Grinstead Gaps and the environment that makes the landscape here special.

In conclusion the agricultural landscape of the fields around Partridge Green outlined in these studies has remained undeveloped for centuries and is vital to the landscape value and character of the area. The fields are irregularly shaped mixed-use open fields of historic and cultural heritage value, first cleared as assarts and probably dating back to medieval times. They extend north and west from the Partridge Green BUAB with views across undeveloped agricultural countryside and open fields giving a special tranquility and a locally distinctive sense of peace to the local population. The green fields of sites LG1, LG2 and LG3 with their mature hedgerows and trees form an intrinsic part of this more open countryside which starts from the Partridge Green BUAB and lends a rural feel to the area; the fields are also acting as vital buffers between the edge of Partridge Green and the settlements of Jolesfield and Littleworth. Any development into these locations would therefore create an incursion into the countryside and cause irreversible damage to the special, local landscape character of this sensitive rural fringe beyond the BUAB; these visual buffers between Partridge Green and its local hamlets would disappear, becoming merged into one and no longer having any sense of separation.

b) Landscape Capacity

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Reference is made to The Horsham District Landscape Capacity Study (April 2014), (see v) in Appendix). This study was based on an assessment of the landscape character and visual sensitivity to development and landscape value of existing Category 1 and Category 2 settlements within the Horsham District. The study identified the resulting landscape capacity of parcels of land around Category 1 and 2 settlements to accommodate housing and employment development and to identify areas where new development could best be accommodated without unacceptable adverse landscape and visual impacts. With reference to Partridge Green it is no longer classified as a Category 2 settlement; under the new Horsham District Planning Framework (Nov. 2015), ref. Policy 3, Strategic Policy Development Hierarchy, its settlement type is now a Medium Village.

The study's specific reference to Partridge Green was as follows:

Partridge Green

As there are no strong physical boundaries to development around Partridge Green, all the countryside around the settlement has been included within the capacity assessment. The landscape falls within the Low Weald National Character area, and Horsham District Character Areas J3: Cowfold and Shermanbury Farmlands, and P2: Upper Adur Valley. Overall the landscape is gently undulating and comprises a mix of smaller and larger scale fields with some scattered woodlands, and to the south of the village the course of the River Adur, which has narrow valleys with gentle sides. Within the assessment area four distinctive landscape study areas are identified, PG1, PG2, PG3 and PG4.

With regard to the areas that have been identified as Local Gaps, LG1 and LG2 come within assessment area PG1 and LG3 assessment area PG4. The capacity assessment for area PG1 was defined as Moderate and area PG4, Low/Moderate. A more detailed definition of these assessments can be found in Section 4, Extent of the Gaps (below).

c) West Sussex County Council – A Strategy for the West Sussex Landscape – October 2005 (see vi) in Appendix)

This document referred to the importance of retaining the sense of identity of settlements and ensuring their separateness when locating development.

d) Partridge Green and Dial Post Design Statement – adopted by Horsham District Council as Supplementary Planning Guidance (Jan. 2001)

Historically as far back as 2001 with this locally commissioned design statement these Local Gaps are seen to be valued as areas that are special and important to the local community, their retention being considered key to maintaining the rural character of Partridge Green and its surrounds; it is emphasised that sites LG1, LG2, and LG3 all fall within the areas of countryside that separate Partridge Green, Littleworth and Jolesfield – reference is made specifically to the section on Open Spaces:

Ref. Section V Design

Ref.6a.1 "Open spaces are an essential part of the landscape. They are an integral part of the rural character of the area. Even within a village context such as in Partridge Green and Dial Post they provide important buffers between areas of different uses and character. This is especially true of the areas of remaining countryside that separate Partridge Green, Jolesfield and Littleworth."

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Ref. 6a.2 "The retention of the open areas between Littleworth and Jolesfield and Partridge Green, centred around Jolesfield Common, together with the gap between Dial Post and the A24 is considered of key importance by the local communities."