# Cowfold Neighbourhood Plan 2019 – 2031



# Pre-Submission Plan Aug 2019

**Cowfold Parish Council** 





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#### **Foreword**

Welcome to the Cowfold Neighbourhood Plan (CNP) for the Parish of Cowfold.

The Cowfold Neighbourhood Plan Working Group (CNPWG), on behalf of Cowfold Parish Council (CPC), has produced this plan in discussion with local residents to balance their views with the Horsham District Planning Framework (HDPF) requirements for the period up to 2031.

Under the Localism Act, Parish Councils and qualifying bodies have been given powers to deal with the local issues of planning and to inform planning authorities on these matters. The process began with the designation of the Neighbourhood Plan Area in May 2016 followed by a number of informal meetings. The first meeting of the CNPWG was not until October 2017.

There is very real pressure on housing numbers following many years when the rate of new housing completions have fallen well below the number required to meet a growing demand. This has been fuelled by longer lifespans, divorce and population demographics.

The current Government commitment is to complete 300,000 new homes pa. This is reflected in the HDPF commitment to build 16,000 homes during the plan period of 2011 to 2031. The bulk of these will be delivered from areas with higher levels of infrastructure leaving at least 1500 homes to be delivered from Parish Neighbourhood Plans. A further 750 homes are anticipated as "Windfall".

National policy specifies that plans need to be brought forward positively and for sites to be sustainable as defined by three core aspects. They should support Economic Growth, Protect the Environment and deliver Social Benefits through a strong and healthy community. The CNP has been developed over a process of data collection and by sharing each stage with the community to gather and incorporate feedback.

In essence, to be considered sustainable most new developments should include the following: be located within easy walking distance of the village facilities; not have any measurable negative impact on Air Quality or Biodiversity; and should provide groundwater management that reduces the risk of flooding within the development or to adjoining areas.

A community survey was carried out in October 2017 with a questionnaire hand delivered to every household within the Parish. Analysis of the 134 returned questionnaires provided the basis for the Key Aims.

#### **Key Aims**

- Maintain the village atmosphere and sense of community enhancing the benefits of its rural location and setting in open countryside.
- Balance the needs of the community with the available infrastructure; keeping housing integrated within the village and preventing urban sprawl.
- Create an environment that reduces the impact of traffic and associated pollution focussing on the health of residents and the safety of pedestrians and cyclists.

#### Cowfold Neighbourhood Plan



• Encourage sustainable economic growth by supporting appropriate infrastructure.

#### The Plan seeks to meet these aims by:

- Selecting housing sites that adjoin the existing built up area, have natural defensible boundaries and can accommodate the 40-70 additional new homes required to meet the housing need.
- Ensuring access to these sites has a positive impact on traffic by reducing standing traffic within the conservation area.
- Identify green spaces and retain the natural character of the surrounding countryside so enhancing the setting that is an essential part of Cowfold.
- Supporting development and the local economy in a way that has a positive environmental impact.

Producing this plan has taken immense effort by a core group of volunteers who have gathered evidence, presented this to residents, recorded and incorporated their feedback. This has been used to develop the plan so as to reflect the views of the Parish residents.

The goal has always been to find the balance between housing need and infrastructure limitations in such a way that could enhance our community and ensure it thrives into the future. We believe the CNP has achieved this and set us on a clear path to 2031 and beyond.

Horsham District Council have commenced their Local Plan Review and anticipate publication of this in 2021, whilst this is not expected to supersede the production of the Cowfold Neighbourhood Plan it may well arrive at a different Housing Need number. The CNP recognises this with a commitment to an early review when, if required, the Housing Number and the means of achieving this will be reconsidered so as to bring the CNP into line with the reviewed HDC Local Plan.

Thanks are due to all members of the CNPWG and all those residents that have taken the time to read and understand this process during its various stages and contributed such valuable feedback.

Thank You

Jerry Hooper Chair, Cowfold Neighbourhood Plan Working Group.

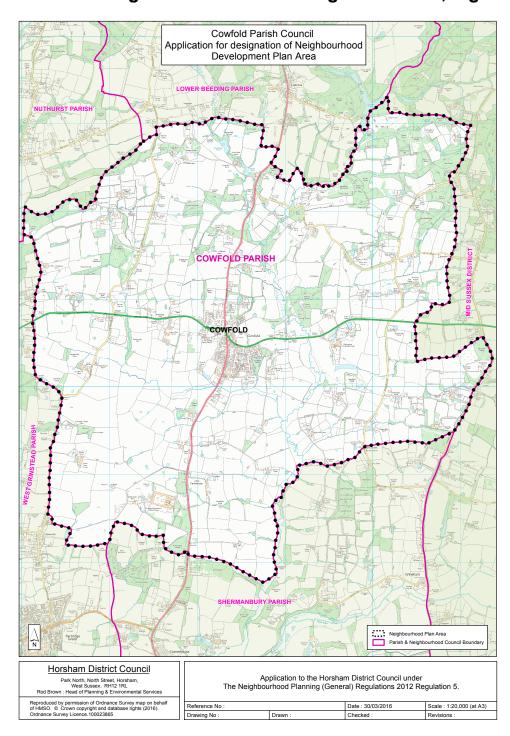


# 1 Introduction

# 1.1 Background

- 1.1.1 Cowfold Parish Council (CPC) has prepared the Cowfold Neighbourhood Plan (CNP) to influence and guide development in the Parish up to 2031.
- 1.1.2 The Neighbourhood Plan covers the whole Parish area as shown below in Figure 1. The area was designated on May 16<sup>th</sup> 2016 by Horsham District Council (HDC) for the purposes of Neighbourhood Planning.

# Cowfold Neighbourhood Plan Designation Area, Figure 1





- 1.1.3 The **Pre-submission** CNP has been prepared following extensive background work and public consultation. It has been prepared having regard to the Neighbourhood Planning (General) Regulations 2012, the National Planning Policy Framework (NPPF) and is in 'general conformity' with the District's adopted Development Plan Document, which includes the Horsham District Planning Framework (HDPF).
- 1.1.4 The heart of the NPPF is a presumption in favour of sustainable development:
  - "The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs." (NPPF Feb 2019, Paragraph 7) The CNP puts this into a local context by including Objectives, Policies and Aims setting out how any supported development will be sustainable.
- 1.1.5 The CNP sets out the policies that will influence development, the development principles and the allocation of land for housing and designation of Local Green Space. Where important issues for the Parish cannot be featured as Policies they have been included as Aims ensuring that all issues of importance to the residents are included.

#### 1.2 **Planning Context**

- 1.2.1 The Localism Act 2011 introduced new rights and powers to allow local communities to shape new development by preparing Neighbourhood Plans. A Neighbourhood Plan establishes planning policies for the development and use of land, for example where new homes should be built and what they should look like. Neighbourhood Plans allow local people to influence the type of development for their area while contributing to the wider needs of the area.
- 1.2.2 The Government, through the NPPF (Revised Feb. 2019), advises:
  - "Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies".
- 1.2.3 Neighbourhood Plans must be in "general conformity" with the strategic policies of the adopted development plan for the District. The relevant adopted Development Plan Document (DPD) of the District is the HDPF.
- 1.2.4 The HDPF sets out the strategic policies, which the CNP must be in conformity with. It sets out the planning strategy for Horsham District (excluding South Downs National Park) to deliver the social, economic and environmental needs of the Plan area up to 2031. It sets out the policy framework and seeks to facilitate the delivery of 16,000 new homes over the plan period of which "at least" 1500 are to be delivered across the District through neighbourhood planning.



#### 1.3 **Plan Preparation**

- 1.3.1 CPC commenced preparation for the CNP with agreement to proceed to Stage 1 in April 2015. The working group was formalised in October 2017 with the first action being to distribute questionnaires to all households in the Parish as well as putting a live version on the PC website. The results were analysed, presented to the Parish Council and published on the CPC website in chart form.
- 1.3.2 Extensive background work and stakeholder engagement has been undertaken to facilitate the production of the CNP and so ensure that it meets the needs of the plan area and the aspirations of local stakeholders, whilst having regard to the constraints of the Parish.
- 1.3.3 All households were encouraged to contribute to the Vision for the Parish, and in support of this to develop a series of Objectives, these are listed in Chapter 3.
- 1.3.4 A public exhibition that provided detail of potential development sites and the wider Neighbourhood Planning context was held on 23<sup>rd</sup> March 2018. This event was attended by 205 registered attendees and gave stakeholders the opportunity to provide feedback on their site preferences via a questionnaire.
- 1.3.5 A public meeting held on 13<sup>th</sup> July 2018 provided landowners and developers with the opportunity to present their proposals and detail the benefits to the Parish. A total of 45 Parish residents took the opportunity to question the proposers directly at this very constructive and interactive meeting.
- 1.3.6 The overall housing need in the Parish was agreed by the Working Group, after careful consideration and in light of the changing parameters, on 21st November 2018. The Parish Council ratified this on December 10<sup>th</sup> 2018.
- 1.3.7 The sites to contribute to meeting this need, and their individual merits were discussed at a meeting of the Parish Council, together with Working Group members, on 13th February 2019. A short list of 4 preferred sites was agreed.
- 1.3.8 The Pre-submission plan represents CPC's proposals on meeting the identified housing and infrastructure needs over the Plan period, whilst seeking to protect the important, high-quality and historic landscape setting of the Parish. The location of Cowfold at the junction of the A272 and A281 results in significant traffic and air quality issues, these have been taken into account as far as is possible.
- 1.3.9 The CNP has been amended as a result of public feedback and the advice of HDC. It continues to facilitate the delivery of housing to meet the identified housing need of the Parish whilst protecting the valued character of the area, its biodiversity and its residents particularly with regard to pedestrian safety and air quality.



#### 1.4 Plan Structure

The CNP is set out as follows:

- Chapter 1: Introduction and background information
- Chapter 2: Description of the Parish
- Chapter 3: Vision and Objectives
- Chapter 4: Environment and Heritage
- Chapter 5: Community Infrastructure
- Chapter 6: Housing
- Chapter 7: Economy and Employment
- Chapter 8: Transport
- Chapter 9: Policies Maps

#### 1.5 Plan Review

- 1.5.1 The CNP is prepared within the context of the overall development strategy set by Horsham District Council. At the current time, this is set out in the HDPF. A review of this plan is underway but is in its early stages. It is due to be completed by 2021. At that point, a new Development Plan will be in place, and this will become the key overarching document that will set the development strategy for the District up to 2036.
- 1.5.2 It is acknowledged that this review will establish the overall quantum of housing that will need to be delivered within the district over the remainder of the plan period. Reflecting current Government best practice, it is likely this updated plan will set out housing numbers to be delivered in each settlement/parish of the district. This housing number may be higher than existing housing requirements set out in the HDPF.
- 1.5.3 Acknowledging this potential change in circumstances, the CNP is proposed to commence a review within 3 years of being 'made' or following the adoption of the HDPF review, whichever is the later. This review will then seek to set the framework to facilitate the delivery of development required in the parish up to 2036.

#### 1.6 **Consultation**

- 1.6.1 This Pre-Submission Plan and the accompanying Sustainability Appraisal (SA), incorporating the Strategic Environmental Assessment, has been approved by CPC to be published for public consultation for an 8 week period commencing Monday August 19<sup>th</sup> 2019. A printed copy will be available in the village hall during this time. An electronic version will be available to download on the Parish Council website with an electronic feedback form for comments. In addition written comments may be placed in the Neighbourhood Plan collection box, this will be located in the village hall during the consultation period. Comments, feedback or questions can be sent directly to CNP@cowfold-pc.gov.uk
- 1.6.2 To be considered, representations relating to the CNP and/or the Sustainability Appraisal must be received by CPC not later than 5pm on Monday 14<sup>th</sup> October 2019.



#### 2 Parish Profile

#### 2.1 **General**

- 2.1.1 Cowfold Parish lies in the Sussex Weald and is located between Billingshurst and Haywards Heath; it is 8.5 miles to the South South East of Horsham. The Parish is compact and regular in shape, stretching 3 miles both North-South and East-West. It is bisected by two A roads, the A281 running North-South and the A272 running East-West. In total it has a boundary of nearly 24km and covers an area of 1,926ha.
- 2.1.2 The Parish is predominantly rural and has a land area of approximately 7.44 sq. miles. It has a population of 1,904 with 739 occupied dwellings (2011 census).
- 2.1.3 The primary settlement of the parish is within Cowfold Village but with a wide scattering of properties throughout the parish.
- 2.1.4 The existing village edge is mostly softened with hedgerows and woodland. The landscape is predominantly open and exposed to views.

#### 2.2 **Environment and Heritage**

- 2.2.1 The landscape of the Parish is gently undulating, falling from 300ft Above Sea Level (ASL) in the Northeast tip to 25ft ASL in the South. It is drained by the Cowfold stream, which enters the parish just below the man-made Furnace pond in Lower Beeding running slightly West of South.
- 2.2.2 The Parish lies predominantly over Weald Clay, which in turn overlies Upper Tunbridge Wells Sand except along a tongue of land running from the Northeast corner almost to the centre; there are two patches of gravel in the Southeast quarter, and five narrow bands of Horsham Stone running East-West.
- 2.2.3 Although historically rural in character, there were brickworks, gravel and sand pits for a short period in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries but these sites have not been in use since 1909. Cowfold has extensive farmland within the Parish boundaries, both arable and livestock.
- 2.2.4 Cowfold Parish has a strong historical heritage with a 12<sup>th</sup> century (Grade 1 listed) Church, a restored Long House and a medieval Yeoman's house within the village boundaries and many properties dating from the 17<sup>th</sup> and 18<sup>th</sup> centuries. In 1210 Beeding Manor had outlying farms in Cowfold and in 1256 the Bishop of Chichester's chase extended down the whole East side of Cowfold Parish across to the Southwest corner and from there to near the centre of the northern boundary of the Parish. By 1257 the Cowfold tenants, customary and free, formed a distinct group. A large proportion of the Parish was woodland or orchards and remained so until the mid 18<sup>th</sup> century. The parish also includes, the Grade 2\* listed, St. Hugh's Charterhouse Monastery founded by Carthusian Monks in 1873 with construction completed by 1883 and still in use today. The Great Cloister at 115 metres is one of the largest in the world.



- 2.2.5 The Parish includes a Conservation Area, which covers the central part of the village. There are 63 listed buildings within the Parish. Historical assets found within the Parish include monuments, Iron Age pottery, Roman coins, post medieval pottery and prehistoric weapons.
- 2.2.6 Cowfold is one of only two locations in West Sussex where an Air Quality Management Scheme is in operation; the data gathered, over a number of years, confirms that the village centre exceeds the annual mean objective for Nitrogen Dioxide. There has been no significant downward trend despite the introduction of the latest generation of cleaner HGVs, cleaner diesel cars and following the introduction of electric vehicles.

# 2.3 Community Infrastructure

2.3.1 Whilst the Parish is rural it benefits from a range of community facilities; large playing fields, a thriving football club, a small skate park, two children's play areas with swings, slides etc. The new Allmond Centre based on the Western the side of the playing field can be booked for private functions. A Scout hut on the opposite side of the playing field, has a vibrant and active pack. The Village Hall, which is in the centre of the village, is used daily for various societies and private functions. St Peter's C of E Church and the Weald Community Church (which meets in The Smithy). The Hare and Hounds Public House, the Co-Op, a hairdressing salon, a barbers shop, a beauticians and a twice-weekly pop up Post Office all serve to enhance the community.

#### 2.3.2 **Health**

- 2.3.3 Cowfold Medical Group is located in the centre of the village and has a sub branch in Partridge Green. Recruitment for a new Partner for the Practice has so far been unsuccessful and currently the GP lists are closed. The building is of sufficient size to accommodate the anticipated increase that would result from the proposed 70 new dwellings in Cowfold. However there are developments planned in neighbouring parishes that are within the practice catchment area that is expected to result in the building capacity being breached within the next 5 years. The parking provision is insufficient to accommodate the patients given many come from outside the village.
- 2.3.4 The Office for National Statistics recorded the general health for Cowfold as:
  - 952 very good health
  - 651 good health
  - 199 fair health
  - 36 bad health
  - 66 very bad health.
- 2.3.5 The main hospitals serving Cowfold are located in Haywards Heath, Brighton, Crawley and Horsham. With the exception of Horsham, the bus service is considered inadequate for patients needing to visit hospital. A round trip by bus to visit Haywards Heath hospital can take in excess of 8 hours.



#### 2.3.6 Education

2.3.7 St Peter's C of E Primary School is located near the centre of the village. The school had a Good Ofsted report in 2016. The main secondary schools serving the village are Millais school for girls and The Forest Boys School; both located in Horsham and believed to be at capacity. The New Bohunt secondary school, North of Horsham, is due to open in September 2020 and it is hoped that this will alleviate the pressure on the schools serving Cowfold.

#### 2.4 Housing

- Cowfold has a number of houses of medieval origin and in the second half 2.4.1 of the 18<sup>th</sup> century the population started to increase resulting in the need for more housing to accommodate labourer's families. Houses and cottages were built on the wide roadside 'waste' in the village and Parish. Many areas of open space remained in the centre of the village and the size and layout did not appreciably change until after the Second World War, the exception being a parcel of houses built by Fowlers between the village and Bull's Bridge on the Henfield Road between the 1890's and 1930's. In the 1950's Cowfold was enlarged by the building of council houses in the Northeast quadrant of the village along the Bolney Road, the development of some private housing estates such as Thornden in the Northwest quadrant and some additional houses built by Fowlers on the Henfield Road. In 1985 the Acorn Avenue development was built with 12 houses, this development, along with Oakfield Road, was then increased to 120 houses. More recent developments include Holm Oaks, which leads from Oakfield Road and Alley Grove, which leads from Fairfield Cottages and 5 additional houses leading from the Henfield Road.
- 2.4.2 Occupied dwellings; breakdown by type (2011 Census 739 total)
  - 314 detached whole house or bungalow
  - 243 semi detached whole house or bungalow
  - 51 purpose built flats, maisonettes, or apartments.
  - 18 converted (part of converted house or shared house) flats, maisonettes or apartments including bedsits.
  - 4 flats, maisonettes or apartments in a commercial building
  - 3 caravan or other temporary mobile structures
- 2.4.3 Occupied households; breakdown by ownership (2011 Census)
  - 226 owned outright
  - 328 owned with mortgage
  - 1 shared ownership (part owned part rented)
  - 67 social rented
  - 5 rented from council
  - 62 other
  - 98 private rented
  - 85 private landlord or rental agency
  - 13 other
  - 19 living rent free



- 2.4.4 Age structure; (2011 Census 1904 Total)
  - 379 persons aged between 0-17
  - 574 persons aged between 18-44
  - 590 persons aged between 45-64
  - 361 persons aged 65 and over.

#### 2.5 **Economy and Employment**

- 2.5.1 The Parish has one small industrial estate, Oakendene, on the Bolney Road, this is 1.3 miles from the village centre and includes 68 business units although many are single person entities. There is a small business estate, Fowlers, within the village. Several small/medium businesses are located on the Henfield road leading out of the village. Businesses within the Parish boundaries but excluding Oakendene include:
  - Acorn Fencing
  - Alice's Dog Grooming
  - Bus and Bug Vintage Weddings
  - Camelia Botnar (Garden nursery and craft showroom);
  - Chris Waller Carpentry and Joinery
  - Clare Palling Book Keeping
  - Clark Lifting Solutions (Hire/supply of lifting/access equipment)
  - Complete Barbers
  - Cowfold Cottage Tandoori
  - Cowfold Precision Engineering
  - The Fowler Group (Building contractors and swimming pools);
  - Geoff Hunt Garden Designs
  - Hare and Hounds Public House
  - HT Motor Services (mobile mechanic)
  - Insitu South Coast Preservation
  - Jeremys Two Farm Shop and Butchers
  - JET Decorating
  - L P Aerials (TV and satellite specialist)
  - Little Bean Cafe
  - P J Barrow and Partners (Garden machinery)
  - Robin Lackford Motor Engineering (Classic car repairs)
  - Rugwash (Horse rug cleaning an repairs)
  - Saddlers Blinds
  - Sara Rudkin RIBA Architectural Services
  - Southern Motor Group
  - The Co-Operative General stores
  - The Still Rooms Beauty centre
  - Trenchmore Farm Beef and Silly Moo Cider
  - Vazon Technology (IT Consultancy)
  - Wheelwise Engineering
  - Xtreme Restoration
- 2.5.2 Currently there is a 'pop up' Post Office twice a week in the centre of the village.



#### 2.6 **Transport**

- 2.6.1 The Parish is well served by the road network with both the A281 and A272 bisecting the village centre. The No.17 bus serves Cowfold from the Stagecoach Company, which currently operates every 30 minutes until 20.00 between Horsham and Brighton. Compass Travel provides a free bus service on behalf of Tesco at Broadbridge Heath, on Thursdays only.
- 2.6.2 The nearest railway stations are Horsham, Haywards Heath and Burgess Hill, at 7 miles, 8.2 miles and 8.8 miles respectively.
- 2.6.3 Numerous public footpaths and bridleways serve the village.
- 2.6.4 There is a high reliance on car travel as a result of limited public transport; there is no East-West bus service and limited local employment opportunities. Over 60% of households have 2 or more cars.
- 2.6.5 The road network provides good connectivity but the natural restriction created by the staggered A272/A281 junction, combined with the volume of traffic using the A272 as a major link road, results in significant standing traffic during morning and evening peak periods. This is reflected in Air Quality and Pedestrian Safety being raised as key issues by the community.



# 3 <u>Vision and Objectives</u>

#### 3.1 **Initial Consultation**

3.1.1 Early engagement included a printed questionnaire, delivered to each household in the Parish. The 134 completed questionnaires enabled the collation of views and established the basis for the Vision and Objectives. The initial draft was published at the Public Exhibition held in the Village Hall on the 23<sup>rd</sup> March 2018.

#### 3.2 Parish Vision Statement

Maintain the village atmosphere and sense of Community that makes Cowfold a desirable place to live. Keep housing integrated within the village and balanced to meet current and future needs, ensuring that development is sustainable, is in balance with the appropriate infrastructure and the needs of the existing Community. Enhance the benefits of our rural location with its services, facilities, amenities and activities. Create an environment that reduces the impact of traffic focusing on the current and long-term health of residents and safety of pedestrians and cyclists.

# 3.3 Strategic Objectives

- Reduce the impact of traffic, volume and speed, on air quality and include through-traffic calming measures to reduce build up of standing traffic within the AQMA. Encourage proposals that support the use of Electric Vehicles.
- ii. Preserve and enhance Green Infrastructure, including open spaces, to maintain the look and feel of the parish as well as helping to mitigate the impact of traffic-induced pollution.
- iii. Build on local rural character by: preserving and enhancing access to the surrounding countryside; procuring a net gain in Biodiversity; and ensuring developments are sustainable, in areas of least flood risk, with any flood risk arising from development being fully mitigated.
- iv. Conserve and enhance historic aspects of the village; protect both the setting of the Conservation area and the settings of important local heritage assets.
- v. Keep the village feel and atmosphere; conserving open space, retaining the allotment provision and enhancing Cowfold as a village. Maintain the distinctive views and visual connectivity with the surrounding countryside and avoid urban sprawl. Recognise Cowfold's place within the district settlement hierarchy and enhance the village centre as a focal point.
- vi. Improve road crossings, footpaths and cycleways to provide better quality and safer connections throughout the parish, to places of work and adjoining communities with a focus on pedestrian safety to reduce car dependency. This should in particular meet the needs of the disabled, elderly, parents with young children and children.



- vii. Ensure all sections of the Community have access to medical facilities, primary education, pub, place of worship, sporting amenities, cultural activities and village shop/post office. Support youth, sport and cultural facilities in order to meet the needs of the community.
- viii. Maintain and grow the sense of Community by supporting sympathetic integrated development, consistent with local housing need enabling residents to remain in the parish throughout their lifetime, with a suitable mix of homes and tenures.
- ix. Ensure all new homes meet and ideally exceed minimum standards for energy efficiency and build quality noting the unavailability of mains gas within the village. They should be built to a density appropriate to the location, provide adequate off-street parking and use local materials where appropriate.
- x. Facilitate employment opportunities within the Parish; enabling the necessary infrastructure, including adequate Mobile and Broadband connections, to encourage self-employment and working from home, and the associated reduction in commuting to work outside the Parish.
- xi. Support the enhancement of public transport connections to urban centres and places of work/education/medical facilities and the wider public transport system. This should include routes, frequency and safe bus stop pull in facilities.
- xii. Prioritise developments that provide improved road safety, encouraging solutions that result in improved sustainability, pedestrian and cycling facilities taking particular note of the needs of the disabled, elderly, parents with young children and children.
- xiii. Ensure developments take into account the local level of car ownership and off-street car parking requirements with Electric Vehicle charging facilities as appropriate.



# 4 Environment and Heritage

4.1 Cowfold is characterised by the conflict that exists between the heavy traffic passing through its centre, the resulting Air Quality issues and the beautiful countryside in which it sits. This rural environment is one of the most treasured aspects of this village, whilst the impact of the high volume and speed of the traffic are the biggest cause for concern to the health and wellbeing of the residents.

# **Objectives:**

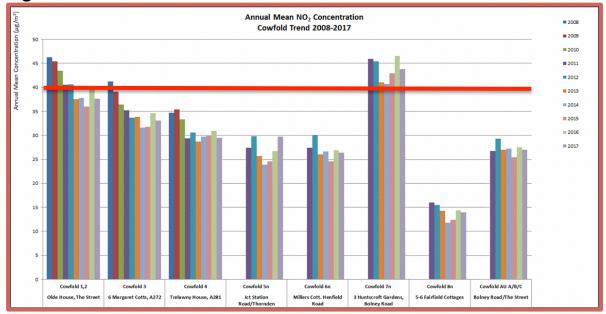
- Reduce the impact of traffic, volume and speed, on air quality and include through traffic calming measures to reduce the build up of standing traffic within the AQMA. Encourage proposals that support the use of Electric Vehicles.
- 2. Preserve and enhance Green Infrastructure, including open spaces, to maintain the look and feel of the parish as well as helping to mitigate the impact of traffic-induced pollution.
- 3. Build on the local rural character by: preserving and enhancing access to the surrounding countryside; procuring a net gain in Biodiversity; and ensuring developments are sustainable, in areas of least flood risk, with any flood risk arising from development being fully mitigated.
- 4. Conserve and enhance historic aspects of the village; protect both the setting of the Conservation area and the settings of important local heritage assets.

# 4.2 **Air Quality**

- 4.2.1 Air Quality Management Areas are designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.
- 4.2.2 The Cowfold Air Quality Management Area (AQMA) was designated in December 2011 by Horsham District Council and includes 8 measurement points. Cowfold is one of only two such designated areas within West Sussex. Cowfold AQMA consistently breaches the Environment Act 1995.
- 4.2.3 The high level of Nitrogen Dioxide within the AQMA directly affects all those using this area to go about their daily business. Of particular concern are the young, on their way to school, and the elderly. The chart in Figure 1 shows that one of these measurement points has consistently breached the national legal limits over the last 7 years. There is no clear downward trend despite the introduction cleaner diesel HGVs and increased electric vehicle usage.
- 4.2.4 CNP seeks to address this issue by ensuring that any new development does not further adversley impact the air quality by including appropriate traffic calming measures to conserve or improve traffic flow and by maximising non vehicular access to village facilities.



# Figure 1



# **Aim 1: Air Quality Management**

- i. CPC supports sustainable development proposals that do not have an adverse effect upon air quality and users within the Parish.
- ii. CPC supports development proposals that include measures to provide traffic calming and/or gating with the aim of reducing queuing traffic within the Air Quality Management Area.

# 4.3 Sustainability

- 4.3.1 Sustainable development has been defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs".
- 4.3.2 CNP seeks to achieve this with regard to energy use and emissions by ensuring developments not only meet the standards of today but also be built in such a way as to meet the likely standards of the future; this includes sustainable, non-fossil based heating systems, thermally efficient buildings and electric vehicle rapid charging points.
- 4.3.3 CNP seeks to achieve this with regard to transport by ensuring houses are located within walking distance of facilities and amenities so encouraging travel on foot instead of by vehicle. Cowfold's pavements, particularly along the main roads, are narrow and uneven increasing the risk of accident. New developments need to include safe walkways linking them to the village centre.



#### **Aim 2: Sustainable Development**

- i. CPC supports development proposals that seek to incorporate:
  - a. efficient building standards and sustainability measures that are at least equal to National standards;
  - b. heating systems that minimise the use of fossil fuels and contribute positively to carbon reduction; and
  - c. rain/domestic water harvesting and recycling systems.
- ii. CPC supports developments that are within easy walking distance, ideally less than 500m, from the main village facilities to promote pedestrian access rather than vehicular.

# 4.4 Village Amenities

4.4.1 Proposals should include aspects that lead to the conservation of resources and provide the residents with the opportunities to buy locally and work from home or at least within cycling or walking distance. Village amenities may need to be enhanced to facilitate this.

# **Aim 3: Village Amenities**

 CPC supports proposals that seek to enhance the amenities of the Parish. This will include, but is not limited to, proposals to enhance the public realm, open space, the parking environment and sustainable transport options.

# 4.5 **Light Pollution**

4.5.1 Encouraging non-vehicular traffic requires a good standard of suitable pathways that are suitable for use in all weathers, night and day. However, the use of inappropriate lighting, where a significant percentage of the light is wasted, is not compatible with an ethos of sustainability.

# **Aim 4: Light Pollution**

- i. CPC supports proposals that seek to minimise light pollution in the Parish.
- ii. CPC supports additional and improved street and footpath lighting throughout the village where this can be achieved with minimal light pollution.

# 4.6 Flood Risk Mitigation

4.6.1 The Environment Agency has categorised all areas of the country by level of Flood Risk. Flood Zone 1 is considered to be low risk and most suitable for development. There are separate maps relating to risk from rivers and from surface water.



- 4.6.2 Cowfold sits predominantly on clay with poor natural drainage. Some natural watercourses have been lost, increasing the risk of groundwater flooding to residential areas, the village centre and areas of open countryside being considered for development. Two watercourses run in the vicinity of Cowfold village, the Cowfold Stream and the River Adur, these are fed by a network of drains and ditches. A network of ponds and flood plains form an important part in minimising the risk of flooding to adjacent residential areas and highways. Part of the Cowfold Stream system crosses the A281 along the southern boundary of the village.
- 4.6.3 Development will only be supported where it is proposed for areas designated as Flood Zone 1 and makes a positive contribution to groundwater management.

#### Policy 1: Groundwater and Surface-water Flood Risk

- Development proposals that incorporate sustainable drainage techniques to manage surface water and mitigate groundwater flood risks will be supported.
- ii. Development proposals that reduce the risk of flooding, either on site or to adjacent areas, will be supported.
- iii. Development proposals that are located in areas at the lowest risk of flooding in accordance with national and development plan standards will be supported.

#### 4.7 Biodiversity: Protection and Enhancement

4.7.1 The Parish is predominantly rural in character with a rich biodiversity including many strips of assart woodland. The October 2017 Parish survey established that over 50% (69/134) of respondents valued the rural character of the Parish. There is a range of habitat within the Parish, this is important in providing habitats and/or corridors for the movement and general wellbeing of wildlife. The CNP seeks to ensure the protection and enhancement of these ecological assets of the Parish.

#### 4.7.2 **Green Infrastructure**

- 4.7.3 The NPPF defines Green Infrastructure as a "network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities."
- 4.7.4 The benefits that result from this Green Infrastructure include an enhancement in the visual appearance of the area, provide access for residents to sport, recreation and quiet enjoyment, connected networks for wildlife, helps to reduce flood risk, facilitates non-car modes of travel, and provides allotments.
- 4.7.5 Well-managed Green Infrastructure contributes to the wider economic and social aspects of the community including improved mental and physical health.



4.7.6 The CNP seeks to both conserve and enhance existing Green Infrastructure assets and ensure new development contributes to the enhancement of this network.

#### **Policy 2: Green Infrastructure**

- Development proposals, which seek to conserve or enhance existing Green Infrastructure network will be supported.
- ii. Proposals that will deliver a net gain in Green Infrastructure will be supported.
- iii. Proposals that seek to improve access for pedestrians and cyclists through Green Infrastructure linkages will be supported.
- iv. Development proposals that would result in the loss of existing Green Infrastructure will not be supported unless it can be demonstrated that they secure new opportunities that:
  - a. deliver an overall net gain in Green Infrastructure;
  - b. incorporate provisions to deliver an equivalent carbon-sink capability in the short term; and
  - c. deliver a net gain in Biodiversity.

### 4.8 Local Green Space

- 4.8.1 The NPPF enables local communities, through Neighbourhood Plans 'to identify for special protection' green areas of particular importance to them. By designating land as Local Green Space (LGS), local communities are able to protect these spaces.
- 4.8.2 The NPPF notes that "The Local Green Space designation should only be used where the green space is:
  - a) in reasonably close proximity to the community it serves;
  - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
  - c) local in character and is not an extensive tract of land."
- 4.8.3 Having regard to these criteria, it is considered that there are a number of green spaces in the parish that meet this test and merit special designation and protection. CPC have identified 13 areas within the parish where they wish to protect the special qualities of that area.
- 4.8.4 Cowfold is located at the crossroads of the A281 and the A272 hence traffic and Air Quality are key concerns. One of the key reasons that people chose to live in the area, despite the negative aspects of traffic, is the rural location of the village with its surrounding of open countryside as well as the many, albeit often small, green spaces within the village.
- 4.8.5 With the following designations we seek to maintain this very important aspect of the village and its surroundings without limiting appropriate development.



4.8.6 The following designated areas are important part of the setting of Cowfold and the daily recreational use of the adjacent agricultural field margins. Given the high volume of traffic flowing through the village, residents value the nearby fields as a tranquil environment and an opportunity to enjoy the rural location of the village. LGS06, LGS07 and LGS08 are particularly important in this respect and also have an important ecological value providing a suitable environment for insect and prey species as well as some rare species such as Nightingales. Modern farming methods make these areas of assart woodland a critical habitat for many species, once commonplace, but now becoming endangered.

# **Policy 3: Local Green Space**

- i. The CNP designates the following locations as Local Green Spaces (as identified on the LGS Policies Map). Development proposals which conflict with the purpose of this designation will be resisted unless they:
  - a. complement the purpose of the designation;
  - b. are ancillary to the use of the land for a public recreational purpose;
  - c. have a positive impact on the biodiversity of the designated area; or
  - d. are required to fulfil a statutory utility infrastructure purpose.

LGS01 Bakers Shaw

LGS02 The Bowling Green

LGS03 Village Green

LGS04 Recreation Field

LGS05 Alley Groves Green

LGS06 Brook Hill Wood

LGS07 Brook Hill Strip

LGS08 Three Oaks Pond

LGS09 Alley Groves Pond

LGS10 Acorn Avenue Green

LGS11 Kicking Field

LGS12 Eastlands Wood (HDC TPO1520 – Mixed Woodland)

LGS13 Eastlands Lane (HDC TPO1519)



#### 4.9 **Heritage**

#### 4.9.1 Heritage Assets

- 4.9.2 Heritage Assets are defined in the NPPF as "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."
- 4.9.3 There are 63 listed buildings within the Parish of Cowfold; the joint pressures of traffic and development can threaten both the assets themselves as well as their setting.
- 4.9.4 CNP seeks to protect these Heritage Assets by ensuring that any development is sympathetic and appropriate.

#### **Aim 5: Heritage Assets**

- i. CPC supports the protection of Heritage Assets and their setting in accordance with national and development plan guidance.
- ii. Particular support is given to the protection of the rural and semi rural setting of heritage assets where this positively contributes to their significance.

#### 4.9.5 Conservation Area

- 4.9.6 A Conservation Area is an area of special historical interest that is protected by law. The local planning authority may designate Conservation Areas under the Planning (Listed Buildings and Conservation Areas) Act 1990. Conservation Areas can range from a small group of buildings to a whole town or village. Conservation Areas do not necessarily cover the whole settlement; normally only the historic core is designated.
- 4.9.7 The designated Cowfold Conservation Area covers the centre of the village.
- 4.9.8 The Conservation Area reflects the origins of the settlement that became Cowfold. There are 16 listed buildings within this area including the church, which is Grade I listed. Some buildings within the Conservation Area may not be considered to be individually or architecturally important but collectively they formed the historic core of the settlement that is now Cowfold.
- 4.9.9 CNP seeks to protect the Conservation Area by ensuring that proposals within the area or its setting are appropriate in nature and scale.



# **Policy 4: Conservation Area**

- i. Development proposals within or affecting the setting of the Cowfold Conservation Area will be supported where they preserve or enhance the character or appearance of the Conservation Area and comply with the requirements in policy 34 (Cultural and Heritage Assets) of the HDPF.
- ii. Development proposals that safeguard the following features:
  - a. St Peter's Church and surroundings
  - b. Church Path cottages
  - c. Margaret cottages
  - d. St Peter's School
  - e. The Gables, Huntscroft and Oakfield cottages
  - f. Fairfield Court
  - g. The Village Hall
  - h. The Street
  - i. Brook Hill
  - i. Potters Green

will be supported where such proposals would conserve or enhance the specific part of the Conservation Area and its immediate setting.



# **5** Community Infrastructure

The Parish survey indicated that 78% (105/134) of responses valued the existing community and/or village feel leading to the conclusion that any development should be sympathetic to maintaining this. However, the growth in vehicular traffic has become a pervasive issue with 77.5% of responses indicating that this is the aspect they would most like to change.

# **Objectives:**

- Keep the village feel and atmosphere; conserving open space, retaining the allotment provision and enhancing Cowfold as a village. Maintain the distinctive views and visual connectivity with the surrounding countryside and avoid urban sprawl. Recognise Cowfold's place within the district settlement hierarchy and enhance the village centre as a focal point.
- 2. Improve road crossings, footpaths and cycleways to provide better quality and safer connections throughout the parish, to places of work and adjoining communities with a focus on pedestrian safety to reduce car dependency. This should in particular meet the needs of the disabled, elderly, parents with young children and children.
- 3. Ensure all sections of the Community have access to medical facilities, primary education, pub, place of worship, sporting amenities, cultural activities and village shop/post office. Support youth, sport and cultural facilities in order to meet the needs of the community.

# 5.2 **Open Space**

- 5.2.1 Open Space is defined in the NPPF as "all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity."
- 5.2.2 Cowfold developed from a cluster of houses on a crossroads, now the busy A272 and A281. The rural nature of its surroundings and the open spaces within the village form part of its character.
- 5.2.3 Open spaces within the Parish are important to the general health and wellbeing of the residents as well as forming part of the village character.

# Policy 5: Open Space

- i. Development proposals that provide a mix of high quality formal and informal open space to meet local needs will be supported.
- ii. Development proposals that result in a loss of open space will not be supported.
- iii. Development proposals including the replacement of open space will be supported where:
  - a. equivalent (in quantitative and qualitative terms) or enhanced open space is provided to serve local needs; and
  - b. the proposed replacement open space is made available before the loss of the existing.



# 5.3 Community Services and Facilities

- 5.3.1 Community services and facilities benefit the community as a whole and provide cohesion to what would otherwise be a collection of houses.
- 5.3.2 The Parish benefits from a range of key community services and facilities including the doctors' surgery/pharmacy, primary school, village hall, sports pavilion, recreational/playing field, public house, village shop, and churches.
- 5.3.3 There are numerous clubs and societies that enhance the sense of community and many residents rely upon one or more of these facilities. It is considered that loss of any of the existing services or facilities would be harmful to the social fabric of the community.
- 5.3.4 The Parish survey of October 2017, 38% (51/134) of the respondents indicated that the local infrastructure did not meet their needs confirms the need for policies to at least conserve the existing services and facilities.

# **Policy 6: Community Services and Facilities**

- i. Development proposals that result in the net loss of community services or facilities will not be supported.
- ii. Development proposals including the alteration and/or replacement of community services or facilities will be supported where:
  - a. they result in equivalent (in quantitative and qualitative terms) or enhanced services or facilities serving local needs;
  - b. any replacement service or facility is made available before the closure of the existing one;
  - c. any replacement service or facility is readily accessible by the community by non car modes of transport;
  - d. where necessary there is safe and adequate vehicular access with sufficient parking to meet the needs of the users;
  - e. there is no unacceptable adverse effect on any local amenity; and
  - f. heritage assets and their setting are protected.
- iii. Development proposals that bring redundant buildings back into use for the benefit of the community will be supported.

#### 5.4 **Medical Facilities**

5.4.1 The Cowfold Medical Practice has a maximum building capacity for 3 full time doctors plus support staff. Each GP has a maximum list size of 1,900 patients giving a maximum building capacity of 5,700 patients. The list size as at January 2019 was 4,820. The practice currently has 2 FTE GPs and has been recruiting for another partner since September 2018, without success. They have closed their list until another full time GP partner can be recruited. The practice calculate an average of 4 patients/household therefore a further 70 houses would represent 280 patients. It is important to take into account the total catchment area; this includes a number of neighbouring parishes where significant housing development is planned. This means that the maximum building capacity is likely to be breached



within 5 years. The Practice may be unable to accept new patients from the proposed developments within this plan.

#### **Aim 6: Medical Facilities**

i. CPC support the retention of and/or expansion of medical facilities in the Parish. CPC support a holistic approach to parking provision on site to facilitate any expansion.

#### 5.5 School Provision

5.5.1 HDC Planning for School Places 2018 indicates that St Peter's CoE Primary School has a maximum capacity of 140 places across 7 school years and 5 class groups. There were 129 pupils in 2017 equating to 92% capacity. The Parish has 739 dwellings. Extrapolating this data shows that there is an average requirement of 0.18 school places per dwelling. The proposed 70 new dwellings plus the 56 that have been permitted or completed would equate to a requirement for an extra 23 places. However, we understand that demographic shift has resulted in a reduced intake and that the current pupil level is in the order of 120 pupils. The net result is that the extra 13 pupils that can be anticipated from 70 new dwellings will take the school population to 133 and 95% capacity at which point it is considered full.

#### **Aim 7: School Provision**

i. CPC support new housing development within the parish subject to satisfactory capacity at local primary and secondary schools.

#### 5.6 Youth Facilities

5.6.1 The youth of Cowfold have playground facilities, a small skate park, a youth club based in the Allmond Centre and Beaver scouts. There are a number of clubs based in the village however any new facilities are always welcomed and have been traditionally supported by the Parish Council.

## **Policy 7: Youth Facilities**

i. Proposals to enhance or provide new facilities for the benefit of young people, including but not limited to, children's play areas, sporting facilities and youth club activities will be supported.

# 5.7 Electric Vehicle Charging

5.7.1 The Air Quality issues that are prevalent in Cowfold have raised the awareness of vehicle-derived pollution leading to increased support for low or zero emission transport.



# Aim 8: Electric Vehicle Charging

- i. CPC support the provision of electric car charging points in the Parish:
  - a. in public spaces; and
  - b. on a per dwelling basis.

#### 5.8 Allotments

5.8.1 Cowfold is well served with two allotment areas, one near the school at Potters and the other to the south of the village accessed by Eastlands lane. Development proposals for site CNP03, Potters, include the option to move the allotments to an adjacent area.

# **Policy 8: Potters Allotments**

- i. Proposals for the development of the allotments at Potters (as identified on the Policies Map) will be supported where:
  - a. the development is required for community use;
  - b. equivalent (in quantitative and qualitative terms) or enhanced allotments are provided to serve local needs;
  - c. the replacement allotments are located in close proximity to the existing; and
  - d. the replacement allotments are made available for use at least one planting season before the loss of the existing.

# 5.9 Community Infrastructure Levy

- 5.9.1 The District Council have prepared an Infrastructure Delivery Plan (IDP) to support the emerging District Plan. This sets out and identifies the infrastructure required to support the growth identified within the emerging plan. The IDP in turn informs the Council's Community Infrastructure Levy (CIL). The purpose of CIL is to raise funds from developments to help pay for infrastructure that is required to support new development across the district.
- 5.9.2 Horsham District Council has adopted the Community Infrastructure Levy (CIL). In accordance with national requirements, those parishes within the district that have "Made" Neighbourhood Plans, will be allocated 25% of monies collected in that area.

# **Aim 9: Community Infrastructure Levy**

- i. CPC will financially support schemes with CIL funds that reduce the impact of traffic in terms of volume, speed or air quality and where this improves safety for pedestrians.
- ii. CPC will financially support schemes with CIL funds that improve pavements, footpaths, cycleways and bridleways where these improve the safety and/or access for residents.



#### 6 Housing

- 6.1 The HDPF includes provision for at least 16000 homes and associated infrastructure within the period 2011 2031. This figure includes for the provision of at least 1500 homes throughout the district in accordance with the settlement hierarchy, allocated through Neighbourhood Planning. In addition to this number it is anticipated that at least a further 750 homes will be provided through windfall housing.
- The Cowfold Housing Needs report, which forms part of the evidence base that supports the CNP, seeks to arrive at the appropriate number of new dwellings within the parish to meet both the local need and provide a fair share of the total district requirement. Cowfold has had 56 homes permitted or completed since 2011; these provide a significant contribution to overall housing supply.
- 6.3 The CNP seeks to meet the needs as set out in the Housing Needs report by careful examination of all development proposals that were promoted as part of the preparation of the CNP, ensuring the homes delivered are sustainable and appropriate.
- To produce a Housing Need Consideration, Dowsett Mayhew was retained to support the process including the calculation of the number of additional dwellings required. This establishes a range from 40-70 new dwellings. The working group decided that the full quantity should be allocated with any additional housing being met through windfall developments.

# 6.5 Residential Development Principles

# **Objectives:**

- 1. Maintain and grow the sense of Community by supporting sympathetic integrated development, consistent with local housing need enabling residents to remain in the parish throughout their lifetime, with a suitable mix of homes and tenures.
- 2. Ensure all new homes meet and ideally exceed minimum standards for energy efficiency and build quality noting the unavailability of mains gas within the village. They should be built to a density appropriate to the location, provide adequate off-street parking and use local materials where appropriate.
- 6.5.1 Cowfold has an established housing density, which is an inherent aspect of the look and feel of the environment. The built up area consists of 560 dwellings (2011 census data) contained within an area of 28.4ha including green spaces, this equates to a housing density of 19.4 dwellings/ha. The Southeast quadrant of the village has the highest housing density with 288 dwellings occupying 11.6ha, including green spaces, giving a housing density of 24.8 dwellings/ha. However, it is important to note that this quadrant has inadequate off-street parking provision. It is estimated that the area required to meet parking requirements would require an increased area of 10% which would result in a housing density of 22.6 dwellings/ha.



#### **Policy 9: Residential Development Principles**

- i. Residential Development proposals will be supported where they:
  - a. are of a sympathetic scale, relating positively to the character, function and layout of the area;
  - maintain appropriate distances between buildings to avoid unacceptable adverse impacts on existing facilities or amenity of adjacent residential properties;
  - c. Incorporate the use of high quality building materials and finishes consistent with high thermal efficiency;
  - d. are of a density that is appropriate to its location and has regard to current levels in the immediate area; and
  - e. are designed to account for the unavailability of mains gas.

#### 6.6 Windfall Housing

- 6.6.1 The NPPF defines windfall development as "sites not specifically identified in the development plan".
- 6.6.2 Paragraph 68 of the NPPF acknowledges small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. In order to promote the development of a good mix of sites Local Planning Authorities should "support the development of windfall sites through their policies and decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes".
- 6.6.3 Policy 15 of the HDPF sets out the strategic policy for meeting housing need in the district. This states that housing supply will be met from a number of different sources, and that this includes at least 750 dwelling units delivered across the district over the plan period via windfall.
- 6.6.4 Cowfold has had a number of new homes approved and/or completed within the Parish, in particular within the defined settlement boundary over the last few years. These comprise windfall development. In accordance with NPPF and HDPF guidance, the CNP seeks to support further windfall development subject to compliance with certain criteria.
- 6.6.5 The new homes delivered through windfall will contribute to meeting the overall housing need of the parish and the wider need of the district.

# **Policy 10: Windfall Housing**

i. Development proposals, for residential development on unidentified sites within the defined built-up area boundary of Cowfold, will be supported subject to compliance with other development plan policies.



#### 6.7 Selected Sites

- 6.7.1 The NPPF makes clear that the ambition of the parish should be aligned with the strategic needs of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan; they should reflect these policies and plan positively to support them. Neighbourhood Plans should not promote less development than set out in the Local Plan.
- 6.7.2 CNPWG promoted a "Call for Sites" and considered all sites against a set of discussed and agreed with criteria in general agreement with Horsham District Council.
- 6.7.3 There were 11 sites proposed with one being withdrawn and two being amalgamated. The resulting 9 sites were appraised on the basis of their conformance to HDPF policies; the December 2018 SHELAA; pedestrian access to key village facilities; site accessibility; PRoWs; Flood Risk; their potential impact on Biodiversity; AQMA and local Heritage Assets and their settings. Note was also taken of the community ranking obtained via feedback at public meetings.
- 6.7.4 Sites CNP04, CNP05, CNP06, CNP08 and CNP09 were not selected due to their poor conformance to HDPF policy. Sites CNP01, CNP02, CNP03 and CNP07 were taken forward as the shortlist of candidate sites for allocation for housing development in the CNP. Detail on all 9 sites together with their conformance to appraisal criteria was first presented to Parish Council members on 13<sup>th</sup> April and then at a Public Exhibition on 1st March 2019. Sites CNP01 and CNP03 were finally selected as best meeting the criteria and the needs of the community.

#### 6.7.5 **Brook Hill, CNP01**

- 6.7.6 This site has good compliance to HDPF policy, has limited visibility from other village areas while being within 500m of key amenities. However, only part of the site is listed in SHELAA as developable. There is concern that the access to the A281, via a roundabout located on the brow of the hill, may not meet safety needs; this is an issue for the Highways Authority.
- 6.7.7 The site is located on Flood Zone 1 agricultural land and has good conformance to HDPF policies, of particular note are policies 2, 3, 4, 25, 31, 35 and 40. The proposals preserve existing woodlands, trees and ponds. There are no undue impacts on heritage assets. The SHELAA December 2018 lists part of the site, SA083 as developable. SA076 is listed as not developable with concerns expressed regarding the ridgeline; the proposals seek to address this. All key village facilities, with the exception of the public house, are located in the order of 800m or less of the site, thus providing good accessibility. Proposals include a landscape buffer to the west, separating the development from the existing woodland and planted buffer to the north providing visual containment. A substantial tract of land to the north of this buffer is proposed as community land.



#### Policy 11: Brook Hill, CNP01 - see Policies Map

- i. Development proposals for up to 35 residential units on land at Brook Hill, as shown on the Policies Map, will be supported where:
  - a. the housing density reflects the character and setting of the site and its surroundings;
  - b. proposals provide safe and suitable access for vehicles, cyclists and pedestrians;
  - c. proposals provide traffic calming, as necessary, at the junction of the access with the A281:
  - d. proposals protect the landscape character of the ridgeline along the northern boundary of the site;
  - e. proposals allow for the retention and enhancement of existing mature trees and hedgerows within the setting of the site and its surroundings.
  - f. proposals provide a robust soft landscape buffer to protect the character of the area, particularly on the western and open northern boundary of the housing area;
  - g. there is no unacceptable adverse impact on the Bakers Shaw LGS;
  - h. the amenity of all existing residential properties bordering the site is protected;
  - i. proposals provide public open space, as detailed on the Policies Map, that is to be transferred to the ownership of the Parish Council or other specially created trust; and
  - j. proposals allow for a high quality, illuminated, all weather, non vehicular access to the existing PRoW to the west of the site.

#### 6.7.8 **Potters, CNP03**

- 6.7.9 This site has good compliance to HDPF Policy, is particularly well situated with regard to the School and Church, is within 500m of key amenities and has the potential to provide a school drop of area. However, providing safe access and egress during peak traffic times, particularly with the additional school traffic, will need careful consideration. Special consideration needs to be given to the northern, A281, frontage to avoid an adverse impact on the streetscene.
- 6.7.10 This proposal is located on Flood Zone 1 agricultural land and has good conformance to HDPF policies, of particular note are policies 2, 3, 4, 25, 31, 35 and 40. The proposals preserve existing woodlands, trees and ponds. The site is adjacent to the Conservation Area although there are no other heritage assets giving cause for concern. The SHELAA December 2018 lists SA609 as developable. Proposals include a landscape buffer to the west, separating the development from the existing woodland and planted buffer to the south providing visual containment. A substantial tract of land to the south of this buffer is proposed as community land.



- 6.7.11 There is a significant current issue relating to mixed vehicular and pedestrian access to the school and adjacent nursery. There is very limited parking for staff and parents at the school with the only access via a private road. For safety reasons it has been agreed that no vehicles shall use this road to access the school during children drop-off or collection times. As a result, parents are parking either on the main A272 or in the Thornden residential area. This poses a safety risk as well as significant disquiet for the residents of Thornden. The developer is aware of this and has proposed that they put in place a safe car parking facility sized and located to accommodate staff parking and the safe drop-off and collection of Primary aged school children as well as nursery aged children to the adjacent nursery.
- 6.7.12 The developer has agreed to incorporate an appropriate children's play space within the development boundary.

# Policy 12: Potters, CNP03 - see Policies Map

- i. Development proposals for up to 35 residential units on land at Potters, as shown on the Policies Map, will be supported where:
  - a. the housing density reflects the character and setting of the site:
  - b. proposals provide safe and suitable access for vehicles, cyclists and pedestrians;
  - c. proposals provide for traffic calming at the junction of the access with the A272:
  - d. proposals include a safe and accessible 'drop-off' point to serve the adjacent school;
  - e. proposals allow for the retention and enhancement of existing mature trees and hedgerows within and around the edge of the site.
  - f. proposals provide a robust soft landscape buffer to protect the character of the area, particularly on the western and southern boundary of the housing area:
  - g. the amenity of all existing residential properties bordering the site is protected;
  - h. proposals allow for a high quality, illuminated, all-weather, non-vehicular access to the existing PRoW to the south-east of the site, the primary school, the children's nursery and the village centre;
  - i. proposals provide appropriate children's play space to meet the needs of the development;
  - j. proposals provide public open space, as detailed on the Policies Map, that is to be transferred to the ownership of the Parish Council or other specially created trust; and
  - k. the layout results in a high quality frontage with the A272.



#### 6.8 **Housing Mix**

- 6.9 Policy 16 of the HDPF sets out the HDC approach to meeting local housing needs. Paragraph 6.7 of the HDPF notes that "this policy seeks to achieve a mix of housing sizes, types and tenures to meet the district's housing needs as identified in the Strategic Housing Market Assessment (SHMA) in order to create sustainable and balanced communities, including a need to meet the housing needs of an increasing elderly population. Consultation feedback and evidence suggests that there is a desire by some elderly residents to move out of their large homes which would free up family sized homes. However, there is a lack of homes that are attractive to the elderly for downsizing that could achieve this. Local communities may wish to identify sites for new elderly downsizing accommodation as part of their preparation of Neighbourhood Plans."
- 6.9.1 The changing demographic with more young adults remaining at home has increased the need for homes with 3 or more bedrooms but still within an attainable price bracket. Increasing the availability of such homes has the benefit of releasing smaller properties back onto the market.
- 6.9.2 The CNP reflects the need for a wide mix of housing from starter homes to larger family homes to facilitate both downsizing for older residents and upsizing as families grow.

#### **Policy 13: Housing Mix**

 Development proposals, which include a mix of dwellings, types and sizes as indicated in the latest housing needs survey, will be supported.

# 6.9.3 Affordable Housing

6.9.4 The Oct 2017 survey indicated the need for a wide mix of affordable and market price housing ranging from starter homes to those for growing families.

# Aim 10: Affordable Housing

- i. CPC will support applicants, for the occupation of affordable housing who have a local connection with the Parish of Cowfold.
- CPC will support developments that provide affordable rented accommodation.

#### 6.9.5 Retirement Accommodation

6.9.6 The revised HDPF recognises the increasing elderly population in the region and the need for Neighbourhood Plans to reflect this.



6.9.7 Cowfold has some specific retirement accommodation; there is concern that any new development may not meet the needs of this sector of the community in particular, given that there is a general increase in the population of those of retirement age.

#### **Aim 11: Retirement Accommodation**

i. CPC support the retention and/or the increase of existing housing stock for retired residents in line with population and demographic changes.



# 7 Economy and Employment

7.1 There are limited employment opportunities within the village with the majority of residents travelling outside the Parish for work or education. This results in transport being a significant factor in providing employment opportunities.

#### **Objectives:**

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

# 7.2 Local Economy

7.2.1 Many small businesses within the Parish have closed during the last few decades. Most of these have been of a retail nature and may reflect demograpic change. The increase in home based employment provides a sustainable opportunity to re-invigorate the local economy. This will require both the place, small offices/workshops and the means to access these, including footpaths and cycleways. It may also require enhanced Broadband and Mobile connections and/or sufficient parking provision for an appropriate work related car or van. These aspects are covered elsewhere by Policies/Aims in the appropriate sections.

# **Policy 14: Employment**

- i. Proposals that enable the development or enhancement of small-scale businesses will be supported where schemes are:
  - a. within the built-up area boundary;
  - b. contained within existing buildings;
  - c. on previously developed sites; or
  - d. in appropriate sustainable rural locations.
- ii. Proposals for business development will be supported where:
  - a. development does not involve the loss of dwellings;
  - b. they are in keeping with the character and vitality of the local area;
  - c. they safeguard local residential amenity; and
  - d. they would not have an unacceptable effect on the local road network in terms of highway safety or residual cumulative impacts.
- iii. Development proposals that would result in the loss of any land, currently in business or other employment use, in the Parish will be resisted unless it can be demonstrated that business use is no longer viable.



#### 7.3 Communications

- 7.3.1 The level of mobile/cellular infrastructure is generally of insufficient quality throughout the Parish. This does not support modern working methods or the improved sustainability that this could provide.
- 7.3.2 Much of the village centre has access to high-speed broadband; however, this is not available throughout the Parish.
- 7.3.3 To facilitate employment within the Parish, in particular working from home, all dwellings and business premises within the Parish would benefit from super-fast broadband and a high level of mobile/cellular connectivity.

# **Policy 15: Communications**

- i. Proposals that would provide access to super-fast broadband networks to serve the Parish will be supported.
- ii. Proposals that would provide a high level of mobile/cellular infrastructure to serve the Parish will be supported.
- iii. Proposals that would provide underground ducting to facilitate future communication networks will be supported.
- iv. Proposals for above ground network installations that would provide access to either a super-fast broadband network or a mobile/cellular network will be supported where their location is sympathetically chosen and designed to respect the character of the local area.



## 8 Transport

- 8.1 The NPPF notes within paragraph 102 that:
  - "Transport issues should be considered from the earliest stages of planmaking and development proposals, so that:
  - a) the potential impacts of development on transport networks can be addressed:
  - b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised for example in relation to the scale, location or density of development that can be accommodated:
  - c) opportunities to promote walking, cycling and public transport use are identified and pursued;
  - d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
  - e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places."
- 8.2 Cowfold is situated at the crossroads of the A281 and the A272, these divide the village into 4 quadrants. The key issue is to implement changes that can substantially reduce the impact of road congestion and pollution arising from both traffic volume and speed within the village and to ensure that all possible measures are incorporated to improve sustainable transport within the Parish.
- 8.3 Road traffic data is collected automatically and provides traffic flow information by vehicle type on an Annual Average Daily basis at a number of locations. As an example Data Collection point 0000043, located on the A272 to the East of Cowfold provides the following: The table, figure 2, shows that although the percentage of HGV is nominally at 5% it is nevertheless growing. This is important as HGVs produce a disproportianate level of pollutants, in the order of 6 fold more per HGV than per passenger car. The table below shows that passenger car numbers in 2018 increased by 10.95% compared to 2011. HGV numbers increased by 14.74% over the same period.

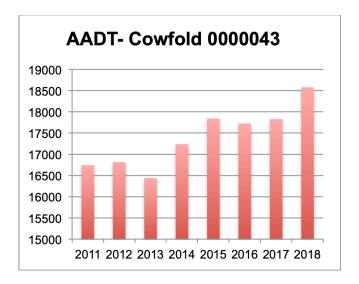
Figure 2

	Average Annual Daily Traffic, Site No. 0000043								
Year	2011	2012	2013	2014	2015	2016	2017	2018	
AADT	16743	16816	16438	17238	17841	17725	17828	18577	
HGV	814	794	799	862	857	897	914	934	
Growth	1.000	1.004	0.982	1.030	1.066	1.059	1.065	1.110	
HGV %	4.86	4.72	4.86	5.00	4.81	5.06	5.13	5.03	



8.4 The overall growth in vehicle flow is clear from the bar chart, Figure 3.

Figure 3



8.5 CNP seeks to limit the impact of queuing traffic that is the key cause of the illegal levels of NO<sub>2</sub> measured on this road as well as maximising the safety of all users whether vehicular, cyclist or pedestrian.

### **Objectives:**

- 1. Prioritise developments that provide improved road safety, encouraging solutions that result in improved sustainability, pedestrian and cycling facilities taking particular note of the needs of the disabled, elderly, parents with young children and children.
- 2. Ensure developments take into account the local level of car ownership and off-street car parking requirements with appropriate Electric Vehicle charging facilities as appropriate.

## 8.6 Traffic Management

8.6.1 Delivering improvement to the existing transport network and associated public transport services, generally lies outside the scope of the CNP, and is reliant on other organisations. However transport issues and measures to improve existing deficiencies are supported by CPC and therefore included in the CNP. Cowfold is designated as one of two Air Quality Measurement Areas in West Sussex; measured data indicates a consistent breach of maximum levels of Nitrogen Dioxide.

## **Aim 12: Traffic Management**

i. CPC support improvements to traffic management in the Parish including but not limited to traffic calming measures, reduction in HGVs routing through the Parish, improvements to road layouts and signalling.



### 8.7 Road Safety

8.7.1 The village is divided into 4 quadrants by the A272 running East/West and the A281 running North/South. The increase in traffic volume over many years has resulted in Cowfold becoming a traffic bottleneck with pollutant levels breaching National Legislation. In addition the pavements that may have been of an acceptable standard for a rural/country lane are now inadequate to meet the needs of a busy arterial road running through a large residential population. This is particularly relevant for the disabled, elderly, parents with young children and children.

## Aim 13: Road Safety

- i. CPC support developments which:
  - a. do not adversely affect road safety; and
  - b. ensure sight lines for traffic egress and ingress are appropriate.

### 8.8 Sustainable Transport

8.8.1 Sustainable development requires the enhancement of public transport connections to urban centres and places of work/education/medical facilities and the wider public transport system. This is a particular issue for those needing to visit the main hospital in Haywards Heath, as there is no East/West public transport availability.

### **Aim 14: Sustainable Transport**

i. CPC support proposals that seek to provide sustainable transport options that facilitate a reduction in motorised vehicle usage.

## 8.9 **Pedestrian and Cycling Environment**

8.9.1 Cowfold has many exceptionally poor pavements both in terms of width and surface quality. These subject disabled and parent/child pedestrians to an elevated level of risk especially given the level of HGV traffic on a relatively narrow road. A key aim is to enhance pedestrian safety by improving road crossings, pavements, footpaths and cycle ways to ensure pedestrian safety and to provide better connections to places of work and adjoining communities.



### **Aim 15: Pedestrian and Cycling Environment**

- i. CPC support improvements, upgrades and additional infrastructure that will positively enhance the pedestrian and/or cycling environment. Whilst recognising the potential impact on traffic flow, improvements including, but not limited to, the following are sought, to optimise the safety and ease of movement:
  - a. pedestrian crossings and hard surface footpaths/pavements and associated street lighting;
  - b. street lighting approaching and within the village;
  - c. safety barriers at crossings;
  - d. increased pavement widths to enhance safety for disabled residents and for adults with young children; and
  - e. pedestrian and cycle connections to places of work that may be within the Parish but outside the built up area.

### 8.10 **Car Parking**

- 8.10.1 The NPPF paragraph 105 states that "if setting local car parking standards for residential and non-residential development, policies should take into account:
  - a) the accessibility of the development;
  - b) the type and mix of the development;
  - c) the availability and opportunities for public transport;
  - d) local car ownership levels; and
  - e) the need to ensure an adequate provision for charging plug-in and ultra low emission vehicles."

#### 8.10.2 Considering the above:

- a) any development within Cowfold has limited accessibility to places of employment; Gatwick Airport, for example, provides significant employment opportunities but only to those with a car, particularly when working unsocial hours;
- b) it is anticipated that the development mix would be broadly in line with the existing housing mix;
- c) the closest rail connections are 7 9 miles distant, there is a limited North/South Bus service but no East/West bus service which means no practical access to Haywards Heath or Burgess Hill for those without a car.
- d) local car ownership levels are shown below, being 160% above that of West Sussex; and
- e) whilst electric vehicle considerations are included in this plan they do not alter the overall car requirement.
- 8.10.3 WSCC residential parking requirements are:
  - 1 bedroom dwellings; 1 space
  - 2&3 bedroom dwellings; 2 spaces
  - 4 bedroom dwellings; 3 spaces

West Sussex data from the 2011 census indicates that 38.8% of households have 2 or more cars.



- 8.10.4 The 2011 census data for Cowfold indicates that 62.7% of households have 2 or more cars. That represents 161.6% more cars per household with the average number of cars per household given as 2.96.
- 8.10.5 The 2018 Local Car Parking survey indicated that the combination of limited local employment and limited public transport have resulted in a local requirement that is significantly above that of WSCC. The survey confirmed that currently over 60% of households have 2 or more vehicles.
- 8.10.6 Significant on-street parking increases traffic issues and limits safe access to dwellings for emergency services.

## **Policy 16: Car Parking Provision**

- i. Development proposals that demonstrate that off road parking provision is sufficient so as to minimise on-street parking will be supported.
- ii. Residential development proposals that provide off-street parking in accordance with the following minimum standards will be supported:
  - a. Residential 1 Bed dwellings; 2 spaces;
  - b. Residential 2 Bed dwellings; 3 spaces; and
  - c. Residential 3+ Bed dwellings; 4 or more spaces

#### 8.11 Quiet Lanes

- 8.11.1 Quiet Lanes are defined as "minor rural roads or networks of minor rural roads appropriate for shared use by walkers, cyclists, horse riders and other vehicles" (West Sussex Transport Plan 2006-2016) Quiet lanes can contribute towards developing integrated transport systems through helping to broaden travel choice; by making journeys easier on local lanes by any mode of transport and providing people with the option to leave their cars at home.
- 8.11.2 Quiet Lanes can also contribute to improving the safety and the quality of life for residents in rural areas. CPC therefore wish to support the designation of Quiet Lanes by the Highway Authority in the area.
- 8.11.3 Lanes that could be considered for this designation within the Parish include Eastlands Lane and Picts Lane.

#### Aim 16: Quiet Lanes

i. CPC support the identification and designation of Quiet Lanes in the Parish by WSCC in order to encourage safer use of the shared space between pedestrians, cyclists, horse riders and vehicles.



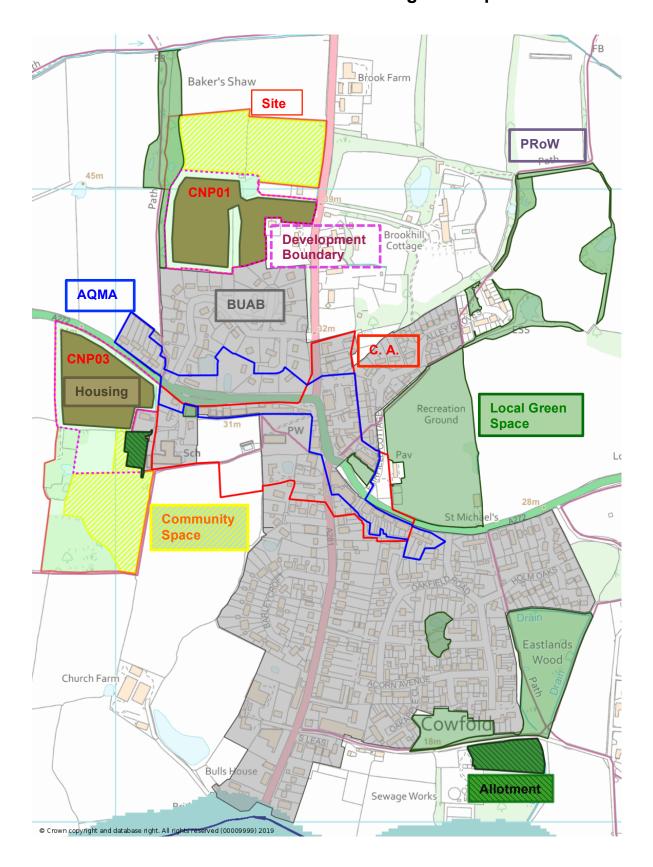
### 9 Monitoring and Review

- 9.1 The preparation of the CNP has taken place within the strategic context provided by the HDPF that was adopted in November 2015. It has also sought to take account of the emerging Site Allocation DPD
- 9.2 CPC recognises that the plan-making process is dynamic and that development does not always proceed at the pace that was originally intended. In other cases, development may come forward which was not predicted at the time that Development Plans were adopted or made as appropriate. In this context, CPC will monitor the effectiveness or otherwise of the implementation of the policies in the CNP on an annual basis.
- 9.3 Where monitoring of the CNP indicates that development is not proceeding as anticipated, CPC will consider undertaking a review of the wider CNP or specific parts of the CNP as appropriate.
- 9.4 Within the context of the monitoring and review process it is acknowledged that HDC is preparing a revised development plan that will establish the overall growth strategy up to 2036. This is due to be completed for the district by 2021. CPC recognize that in light of this the housing numbers may change. Acknowledging this potential change, the CNP is proposed to commence a review within 3 years of being made or following the adoption of the HDPF review, whichever is the later.



## 10 Policies Maps

# 10.1 Overview - Sites Allocated for Housing Development



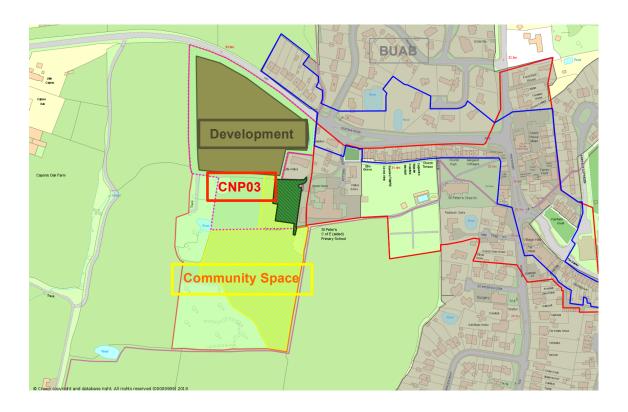


# 10.2 **Proposed Development areas**

# 10.2.1 Brook Hill, CNP01



# 10.2.2 **Potters, CNP03**



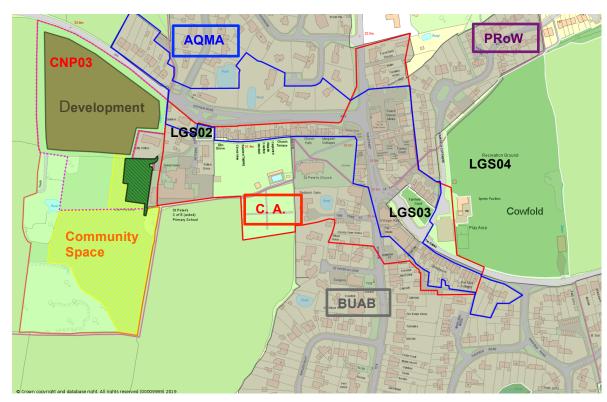


## 10.3 Local Green Space

# 10.3.1 Local Green Space - North

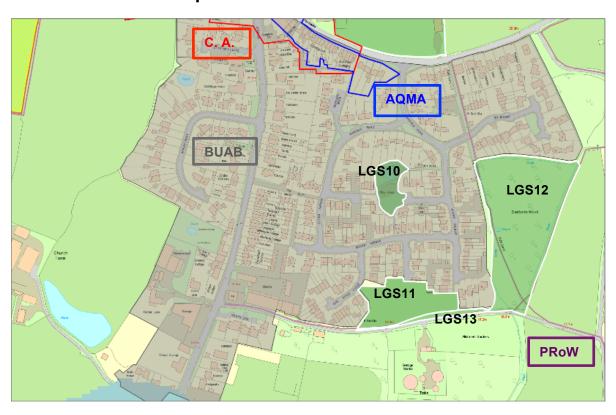


# 10.3.2 Local Green Space - Centre





# 10.3.3 Local Green Space - South





# 11 Schedule of Evidence

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Schedule of Evidence	
Localism Act 2011	
General	
Neighbourhood Planning (General) Regulations 2012	
National Planning Policy Framework	
National Planning Policy Guidance: Neighbourhood Planning and Strategic environmental assessment and sustainability appraisal	
Neighbourhood Planning - RTPI	
Neighbourhood Planning - Locality Resources	
Neighbourhood Planning-CPRE	
Rural Services Network- What is neighbourhood planning?	
Neighbourhood Planning and the Historic Environment	
Neighbourhood Planning - West Sussex County Council guidance	
Neighbourhood Planning in the High Weald Area of Outstanding Natural Beauty	
South East River Basin District Management Plan	
South East Water, Water Resources Management Plan, 2010-2035	
Southern Water Resource Management Plan	
Thames Water Resource Management Plan	
West Sussex Waste and Minerals Plan	
West Sussex Public Health Plan: 2012-2017	
EU Directive 2001 - Strategic Environmental Assessments	
Environmental Assessment of Plans and Programmes Regulation 2004	
A Practical Guide to Strategic Environmental Assessment Directive	
Horsham Planning Policy Evidence Base: Housing	
Strategic Housing Market Assessment, May 2009	
Strategic Housing Market Assessment Update, October 2012	
Strategic Housing Market Assessment Update, October 2014	
Crawley and Horsham Market Housing Mix Report, November 2016	
Crawley and Horsham Starter Homes Report, November 2016	
Housing Need in Horsham District, May 2015	
Urban Housing Potential Study 2004-2018, February 2005	
Assessing Housing Need - Summary Paper	
Horsham Planning Policy Evidence Base: Infrastructure,	
transport and healthy communities	
Sport, Open Space & Recreation Assessment, February 2014	
Horsham Transport and Development Study Addendum. April 2014	
Horsham Transport and Development Study Technical Note, April 2015	
Horsham Transport and Development Study Appendices, April 2015	



Schedule of Evidence	<u> </u>
Horsham Planning Policy Evidence Base: Economic	
development	
Employment Land Review (Part 1)	
Employment Land Review (Part 2)	
Retail Needs Study	
Market Appraisal on the Current and Potential Future Demand for	
Business Space	
Economic Growth Assessment, April 2014	
Economic Growth Assessment Supplementary Report	
Employment Floorspace Review	
Hotel & Visitor Accommodation Study	
Hotel & Visitor Accommodation Study Technical Appendices	
Horsham Town Retail & Leisure Study 2017	
Horsham Planning Policy Evidence Base: Conserving and	
enhancing the natural and built environment	
Landscape Character Assessment, October 2003	
Settlement Sustainability & Greenfield Site Allocations, 2005	
Climate Change Strategy, June 2009	
Gatwick Sub Region Water Cycle Study, January 2011	
Cowfold Air Quality Action Plan, March 2011	
South Downs National Park Management Plan 2014-2019	
Strategic Flood Risk Assessments	
Landscape Capacity Assessment Reports, April 2014	
Green Infrastructure Study, April 2014	
Habitat Regulation Assessment, April 2014	
Settlement Sustainability Review	
Sussex AQ Guidance, June 2019	
High Weald AONB Management Plan 2019-2024	
Air Quality Management Areas	
Horsham District Council: Resources to help make a	
Neighbourhood Plan	
Standard Screening Opinion	
SA/SEA Guidance Note 2015	
Evidence Base Guidance Note	
Environment Agency Consultation on Neighbourhood Plans & SA/SEA	
The Coal Authority Consultation Advice	
EA updated NP checklist Horsham	
Fact Sheet Main NPPF Changes	
Neighbourhood Planning Conference (Post It Notes Questions and Answers)	
2019 March SHELAA-Factsheet	
Contact Details of Statutory Consultees and Other Consultees.pdf	
Contact Details of Ctatatory Consultees and Other Consultees.pdf	1



Schedule of Evidence	
Parish Based Evidence	Date
Office of National Statistics (NOMIS): Cowfold	
English Indices of Deprivation 2015-LSOA Level: Cowfold	
West Sussex Historic Environment Report: Cowfold	Nov 2017
Sussex Biodiversity Record Centre: Cowfold	
Natural England-Land Classification Map	
Magic Map: Cowfold	
Environment Agency Flood Map for Planning: Cowfold	
Scoping Report	Mar 2018
Background Paper: Parking	Apr 2018
Background Paper: Local Green Space	Aug 2019
Housing Needs Consideration Report	May 2019
Site Assessment Pro-formas	Mar 2018
Exhibition Material	2018 - 19



## **Glossary**

AQMA: Air Quality Management Area

**Carbon Sink:** A natural environment viewed in terms of its ability to absorb carbon dioxide from the atmosphere.

CNP: Cowfold Neighbourhood Plan

**CNPWG:** Cowfold Neighbourhood Plan Working Group, the group of volunteers set up by the CPC to deliver the CNP

Conservation Area: The designated area within the centre of Cowfold

**CPC:** Cowfold Parish Council

**DPD: Development Plan Document** 

**Green Infrastructure:** A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

**HDC:** Horsham District Council

**HDPF:** Horsham District Planning Framework, adopted November 2015 and currently undergoing review.

**NPPF:** National Planning Policy Framework, Revised February 2019.

**SHELAA**: The Strategic Housing and Economic Land Availability Assessment (SHELAA) is a process that is carried out to find possible land for development. The assessment of land availability is promoted and set out in National Planning Practice Guidance. The SHELAA is a high level assessment used as a starting point to decide whether sites could be developed for housing, business (economic) or other uses in the Local Plan or a Neighbourhood Plan.

**SHMA:** Strategic Housing Market Assessment.

**Windfall:** Sites not specifically identified in the development plan.

**WSCC:** West Sussex County Council