

Mr Jonathan Bore
Mid Sussex District Plan Inspector
c/o 260 Collingwood Road
Sutton
SURREY SM1 2NX

9 February 2017

Dear Mr Bore

Mid Sussex District Plan Examination

Thank you for your reply of 10 January 2017 to our letter of 19 December 2016, in which we expressed our views on the role of Neighbourhood Plans (NPs) in framing the District Plan.

(1) The role of the Hurstpierpoint & Sayers Common Neighbourhood Plan in informing the District Plan:

Your comments were helpful in distinguishing between the matter of plan-making and the subsequent process of determining applications, and we acknowledge the role of the NPPF in guiding planning decisions. However, the NPPF also makes clear that Neighbourhood Planning gives communities direct power to develop a shared vision for their neighbourhood, and provides a powerful set of tools for local people to ensure that they get the right development for their community. It is clear that Neighbourhood Planning is a key foundation of the Government's approach to Development Plan preparation (paras 183 and 184 of the NPPF).

It is also acknowledged that the NPPF requires Neighbourhood Plans to be in 'general conformity' with the strategic policies of the District Plan and 'not promote less development than is set out in the Plan or undermine its strategic policies'. (para 184 of the NPPF). The Hurstpierpoint and Sayers Common Neighbourhood Plan was prepared and 'made' immediately prior to the preparation of the current iteration of the District Plan. This approach was wholly envisaged and facilitated within the on-line National Planning Practice Guidance (NPPG) (para 009 Ref: 41-009-20160211). This states that the LPA should take a proactive and positive approach, working collaboratively with local councils, including sharing their evidence base.

Our Neighbourhood Plan was prepared fully cognisant of the evidence base of the LPA. This was extensively discussed and agreed with the LPA through the plan preparation process. It positively plans for the plan period up to 2031, taking account of, amongst other things, the housing and population growth predictions prepared and issued by the District Council. Our Plan seeks to make a significant contribution to meeting the housing need of the District up to 2031 and, in addition to allocating housing sites, facilitates a significant part of the Burgess Hill 'Northern Arc' strategic development, itself a major component of the District Plan. In so doing our Plan has provided a complete and balanced development plan serving our community and providing for new housing and employment.

On this basis, our Neighbourhood Plan should be afforded significant weight in the District Plan Examination process. It should be used to help, inform and guide the emerging (and subsequent)

Development Plan documents prepared by the District Council, and should not be treated as (de facto) 'out of date' and requiring review and replacement. The Neighbourhood Plan serves to complement the emerging District Plan, as envisaged in the on-line NPPG.

(2) District Plan Policy DP11: Preventing Coalescence:

Your note of 26 January 2017 has questioned the role of local gaps. We strongly support this policy and the role of Local Gaps. These form part of the policies of our Neighbourhood Plan in taking 'account of the different roles and character of different areas' and 'recognising the intrinsic character and beauty of the countryside' (para 17 NPPF). There are a number of Category 2 and 3 settlements across the district which are in close proximity, but which are nevertheless distinct local communities with their own social infrastructure. The Preventing Coalescence policy is a valuable tool in protecting these separate identities and supporting the 'social role' (para 7 NPPF) in plan-making. The countryside policy DP10 does not on its own take full account of these policy issues.

Our position on the role of local gaps was supported by the DCLG Secretary of State in the case of an appeal on the refusal of 81 houses at College Lane, Hurstpierpoint, in our parish. Our Neighbourhood Plan Policy C3 (Local Gaps and Preventing Coalescence) was quoted in the decision letter of 4 September 2014:

With regard to policy C3 (and the policy of similar intent included in the emerging NP), the Secretary of State agrees with the Inspector (IR13.16-13.20) that, although policy C3 is out of date in so far as it impacts upon the supply of housing, it continues to serve an important planning function in preventing the coalescence of the settlements of Hurstpierpoint and Hassocks and maintaining their separate identities and amenity, with no conflict with the thrust of the Framework. The Secretary of State has also carefully considered the arguments set out by the Inspector at IR13.21-13.23 and agrees with her conclusion that the proposed development would undermine the purposes of the Local Gap and change its character. He agrees that the Gap continues to serve a useful and much valued planning purpose (irrespective of the landscape capacity assessment of the site) and that an increase in built development would result in a small but nevertheless significant diminution of openness. (Ref: Application by Thakeham Homes (Southern) Limited - land off College Lane, Hurstpierpoint, West Sussex BN6 9AB: Application Ref: 13/01250/FUL; DCLG Ref: APP/D3830/V/14/2211499)

The Secretary of State therefore, whilst acknowledging that local plan policies were out of date in respect of housing land supply, considered that the importance of the local gap was sufficient to override the housing need.

We hope that these comments help you in ensuring the soundness of the District Plan.

Yours sincerely

Stephen Hoyles
CLERK TO THE COUNCIL