



**Storrington, Sullington and Washington Neighbourhood
Plan Examination.**

**Statement by Horsham District Council on Behalf of
Storrington, Sullington Parish and Washington Parish in
response to the Further Initial Comments of the
Independent Examiner.**

Question 10.

31 August 2018

1.0 Introduction

‘Can I seek further elaboration or clarification from the QB regarding the fifth criteria in para 4.15 used when assessing boundary alterations to the BUAB which can affect allocations and planning application. The text states: “The site does not have a planning history of significant local community objection to development that may compromise a referendum”. Does the extent of opposition have to be at a level that would prejudice the attainment of a positive referendum across the whole plan area, rather than public opposition close to the site? Does the QB consider that this is an objective criterion for selecting sites which meet the definition of “sustainable development” and does it reflect national advice regarding objective assessment of different sites?’

- 1.1 Storrington and Sullington Parish Council, Washington Parish Council and Horsham District Council have had the opportunity to meet and discuss this response. In light of this meeting, a response has been prepared by Horsham District Council on behalf of the qualifying body who have agreed this response.

2.0 Approach to site selection

- 2.1 Paragraph 4.15 forms part of the supporting text to Policy 1 and sets out more detail to explain the approach of the qualifying body in identifying where development proposals will be supported. This section is supported by additional background documentation including the Sustainability Appraisal and the Site Assessment Report. These documents set out in more detail the approach by which individual sites have been considered, and consequently how built-up area boundaries may need to be amended.
- 2.2 The evidence base documentation demonstrates that the process of site selection has been evidence-led and the data collated in the Site Assessment Report and Appendices has been the mechanism for site selection focussed on conformity with the Basic Conditions and on sites which are available, achievable and deliverable. The QB is of the view that the emerging Neighbourhood Plan has been positively prepared and evidence-led with best endeavours made to accommodate identified need.
- 2.3 The Steering Group has however recognised that the process of plan preparation must take account of the views expressed as part of the community engagement process which has taken place over the course of plan preparation. Unlike development plans prepared by Local Authorities, Neighbourhood Plans are subject to a referendum at the end of the process, and the Qualifying Body were of the view that it was particularly important to take account of the community views *as far as is possible*, in order to maximise the chances of a successful referendum.

- 2.4 There has therefore been considerable engagement between the plan makers and the wider local community through stakeholder engagement which has been thoroughly documented in the Consultation Statement. Wider engagement with stakeholders has been integral to the Neighbourhood Plan process and very much in the spirit of Localism which enables communities to play a much stronger role in shaping the area in which they live and work and in supporting new development proposals. The outcome of public consultations in relation to different sites considered during the plan preparation process is also documented in section 8 of the Site Assessment Report.
- 2.5 With reference to Criterion 5 of Paragraph 4.15 of the Submission Draft of the SSWNP, the Qualifying Body have clarified that following the site assessment / sustainability appraisal process, the potential for community objection was only considered in the event that there was a scenario whereby a number of sites scored equally in the site assessment / SA process. Only then was public opinion given weight in terms of ranking sites for their potential selection in the plan.
- 2.6 The Qualifying Body have also confirmed that although the number of supports or objections to different sites has been documented in the Site Assessment Report, public opinion was considered, where comments concerned material planning consideration rather than solely the strength or volume of local opposition. Furthermore, the neighbourhood planning group acknowledge that the extent of opposition would have to be right across the plan area rather than just objections from residents adjacent to a proposed allocation to compromise any Referendum.

3.0 Proposed Modification

- 3.1 To take account of the clarification set out in this response, some amendments to Paragraph 4.15 are proposed for consideration by the Examiner. Proposed insertions are shown as underlined and deletions as ~~strike through~~:

4.15 *The criteria used to justify a settlement boundary modification at Storrington & Sullington to accommodate proposed allocations ~~are~~ were:*

1. *The site generally complies with the requirements of HDPF Strategic Policy 4 – “Settlement Expansion”.*
2. *The site is immediately adjoining the existing Built Up Area Boundary;*
3. *The site is not in the South Downs National Park nor on land that will compromise the character of the setting of the Park;*
4. *The site represents existing settlement patterns and does not create or add to urbanising effects in land separating existing settlements;*
5. *The site is capable of suitable and safe access to the local road network;*

6. ~~The site does not have a planning history of significant local community objection to development that may compromise a referendum;~~ In any circumstances where alternative development sites performed equally against a range of site assessment criteria, public opinion was taken into account in instances where a site generates significant plan wide opposition and only then if objections relate to a material planning consideration.