



**Intelligent Plans**  
and examinations

**Storrington, Sullington and Washington Neighbourhood  
Plan, 2017-2032 Independent Health Check of Pre-  
Submission Plan and Supporting Evidence Documents**

**Report by Intelligent Plans and Examinations (IPE) Ltd  
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## Introduction

1. I have been appointed by Horsham District Council to undertake an independent Health Check of the emerging Pre-Submission Plan for the Storrington, Sullington and Washington Neighbourhood Plan, 2017-2031 (the NP), together with its Evidence Base documents and to advise the District Council and the NP Steering Group on any concerns, comments and suggestions on the documents. I have undertaken this Health Check in order to assist the NP Steering Group in progressing their Plan towards its Submission for Examination and to enhance the prospect of the Plan meeting the Basic Conditions (and other legal requirements) that are necessary for the Plan to be recommended for progression to a Referendum.
2. I confirm that I have no interests in any part of the designated NP area. I have previously advised the Steering Group and the District Council in September-October 2016 on the measures that I considered necessary to address shortcomings that were evident from the Examiner's report (March 2016) following the earlier Examination of the Plan. I further advised the Steering Group and the District Council in March 2017 on the latest Evidence Base documents to support the NP. This review follows further work by the Steering Group and the District Council on progressing a revised Plan towards Submission.
3. Horsham District Council has provided me with all the necessary documents to enable me to undertake this Health Check.

## Approach to the Health Check

4. My approach to this Health Check has been, firstly, to assess the Evidence Base documents taking into account my previous comments (in the March 2017 review) on the various documents. In broad terms, I have sought to consider whether the relevant evidence is adequate, appropriate and relevant to draft policies, site allocations and designations in the emerging Plan.
5. Secondly, I have undertaken a rigorous review of the Pre-Submission Plan and I set out some general comments and detailed comments on that document in paragraphs 13-27 of this Note.

## Evidence Base Documents

### 1) Draft Site Assessment Report (including Appendices 1-3)

6. I commented in my previous Note that this report could be improved by the following:
  - *paragraph numbering to the main body of the report;*
  - *the two maps at Appendix 3 be put on separate pages;*
  - *Appendix 1 (Small Sites) be placed after Appendix 2 (which should therefore be renumbered Appendix 1);*
  - *the index page for Appendix 2 be refreshed to only include the sites within the subsequent Assessments. Sites that were removed or not assessed, for whatever reason, should be listed separately; and*
  - *the titles for each site in the Assessments be set in a larger font size.*
7. I am pleased to note that the report embodies all of those suggestions. However, it will be very important to ensure that the scoring assessments contained in Appendix 1 have

been carried out on an uniformly objective basis, and we recommend that they be re-checked prior to the next stage of the NP. The revised Site Assessment Methodology does address previous shortcomings, and is of course based on published Locality guidance. However, its potential area of weakness is in the precise scoring (Red, Amber, Green, Blue) of individual site features. I further suggest that the detailed site assessment criteria, which is set out within paragraphs 6.3-6.5 of the Site Assessment Report, are repeated as an Introduction to Appendix 1 in the form of a colour-coded “dummy example” with accompanying notes (referring back to paragraphs 6.3-6.5) – showing, for example, against the Built Up Area Boundary criterion the Green/Amber/Red scores against the tests of Within, Adjacent and Outside. This will increase the transparency and understanding of the subsequent matrices. With those suggestions, I consider that the Site Assessment Report and Appendices will be fit for purpose.

## **2) Local Green Spaces Assessment (March 2017)**

8. I have previously commented that *“The Local Green Spaces Assessment is now a much-improved evidence base document and in my opinion, I am satisfied that it is fit for purpose in underpinning the emerging Plan. In my assessment, it is clear that my earlier concerns have been addressed.”* This remains the case.

## **3) Sustainability Appraisal (incorporating a Strategic Environmental Assessment) (May 2017)**

9. I made the following comments regarding an earlier draft of this document in my previous Note (dated March 2017):

*“I have carefully studied the revised Sustainability Appraisal. As a preliminary comment, I note that this states that the Plan period is from 2016 to 2032. There is some inconsistency between documents on this point, and I note that the emerging draft Plan states (at paragraph 1.1) that the Plan period is from April 2017 to March 2032<sup>1</sup>. My view is that the period 2017-2032 is now the appropriate Plan period, bearing in mind the work that has been undertaken during recent months (since Summer 2016) and that the formal Examination of the Plan may not occur until Summer 2017. Therefore, the Sustainability Appraisal document should be amended to reflect this”.*

*“I appreciate that there still remains some work to be undertaken to produce a complete Sustainability Appraisal. I have therefore focused more on the structure of the document and its methodology. Firstly, there are some inconsistencies between the Contents Page and the actual content. For example, Section 2c on the Contents Page is Section 3 within the report, and Section 3 on the Contents Page is Section 4 within the report. My view is that Section 4 (Sustainability Issues) should precede Section 3 (The Storrington, Sullington and Washington Neighbourhood Plan) as Section 4 is largely a narrative on high level issues, including national policies, and would seem to lead more readily onto the local issues. However, a proportion of the material within Section 4 would be better placed within Section 5 (Key Sustainability Issues for the Plan Area). This is mainly the material*

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<sup>1</sup> This date has subsequently been revised to 2031 as per paragraph 10 below.

*in Section 4a, which would then serve in my opinion as a better introduction to the SWOT analysis. The SWOT analysis comprises two tables (Tables 2 and 3), and I suggest that they be given more prominent headings. Some of the specific Parish commentary in this section could also be placed more directly beneath the relevant table (i.e. Table 2 - Storrington and Sullington and Table 3 - Washington) for improved cross reference”.*

*“I have no specific comments on Section 6 (The Sustainability Appraisal Framework) which conforms with good practice on identifying the issues to be appraised”.*

*“Section 7 (Outcome of the Appraisal of the Objectives, Sites and Policies) comprises the main component of the report. The appraisal process now adopts a five band approach, ranging from Positive Effect to Not Relevant, and this is clearly rather more finely grained than the previous three band approach, and does allow cumulative impacts to be assessed with more accuracy”.*

*“The appraisal of the Objectives is identifying some negative impacts, and flood risk stands out as a key area. In developing an “audit trail” for the Sites and Policies in the Plan, it will be important to demonstrate how these potentially negative effects are being addressed and/or mitigated. From the material that I have seen, I am confident that this is being done but the final document might benefit from a summary section that identifies the primary sustainability impacts (positive and negative) and how they are addressed and, if necessary, mitigated. In my view, the obvious place for this would be at the end of Section 7”.*

*“Finally, the document would greatly benefit from having paragraph numbers, but I am assuming that these will be added once a final draft is nearer completion, as there is work still outstanding at various places across the document”.*

10. I have studied the latest draft of the Sustainability Appraisal (SA) document, and I am pleased to note that most of the comments that I have set out above have been taken into account and embodied in the document. However, there still are a few minor issues to be addressed. Firstly, the front cover refers to the Plan period being 2017-2032, but the Plan period has now been confirmed as being 2017-2031. Secondly, I note that a number of suggested changes to mitigate or strengthen policies contained in Section 7 of the SA have not been carried through into the Pre-Submission Plan. Two examples of this are the suggested mitigations to Policies 3 and 9 set out in paragraph 7.36, and the suggested mitigations to Policies 3, 8, 18 and 19 set out in paragraph 7.69. I refer to this in more detail below, but I am concerned that an Examiner may well want to understand why such mitigations have not been carried forward into the Draft Plan. Thirdly, the title of Appendix 4 should be “**Sustainability** Appraisal .....etc.” Finally, the copy that I have received for review did not contain Appendix 5, which is listed on the Contents page.
11. However, the SA document is now, in my assessment, fit for purpose and subject to a final check I do not consider that there any major issues with the document particularly with its SA Framework and Appraisal Methodology, that will cause fundamental issues at a future Examination.

#### **4) Alignment Study on Housing Needs (April 2017)**

12. I have previously reviewed this document in draft, and I have no further comments to make on the final draft. I consider that it provides a very good assessment of the overall Housing Need position in Horsham district and provides the strategic context for the assessment of the potential Housing Site allocations and policies in the NP. I consider that the Alignment Study is entirely fit for purpose.

#### **The Draft Pre-Submission Plan**

13. I have reviewed the Draft Pre-Submission Plan on two levels, firstly on a broad level to check that it is able to satisfy the Basic Conditions, and secondly at a more detailed level to identify any possible points that may lead to an issue arising at a future Examination. I set out my comments below.

##### **1) General Comments**

14. I consider that the Draft Plan is well structured, and generally presents its content in a concise and appropriate way. The accompanying Plans (Plans A and B, and Policies Maps 1-5) are all clear and at a legible scale. The Evidence Base list at Annex A is useful, and looks to be comprehensive. It would be additionally helpful if web-links to the documents could be added.
15. The Plan period (2017-2031) is clearly stated on the front cover and in paragraph 1.1. The formal designation (by Horsham District Council) of the Neighbourhood Area is covered within Section 1 and accompanying Plan A. However, it would be preferable if the designation could be covered as a discrete sub-section within Section 1 for greater clarity.
16. The Plan does not address excluded matters concerning Minerals and Waste, and an appropriate reference is made to West Sussex County Council as being the body responsible for such matters.
17. The Plan preparation process is described at paragraphs 1.6-1.8. This is probably rather too concise, bearing in mind that the Plan has previously been submitted for Examination. We consider that this section should be expanded, setting out in chronological order (with dates included) how the Plan has been developed. Importantly, it will be beneficial to set out the additional work that has been undertaken in 2016/17 to address the shortcomings identified through the previous Examination process and which have, of course, sought to improve the Plan. This will undoubtedly assist a future Examiner.
18. The Basic Conditions Statement and the Consultation Statement are referenced in paragraph 1.7. We have not seen the latest drafts of these documents, which will no doubt be prepared closer to the date of Submission. However, they should be referenced rather more fully in the Plan and again we suggest that they each be addressed as separate sub-sections within Section 1. The section dealing with the Consultation Statement should contain a brief synopsis of the principal consultation activity and events, building upon the text currently at paragraph 1.9.

19. Section 2 (State of the Parishes) contains most of the key information that is needed to understand the major planning issues affecting the Parishes. However, there is some additional information that could be added to this section to provide a more comprehensive picture. This could include information regarding current public transport (bus) services, retail provision, employment areas and community facilities. This would assist in providing a better understanding of the Strengths, Weaknesses, Opportunities and Challenges that are set out in paragraph 2.17. We have considered how this might be best achieved without a significant amount of additional work and we consider that a Plan, showing the facilities/locations across the Parishes, should suffice, with references if necessary to Evidence Base documents.
20. Section 3 (Planning Policy Context) presents a very good appraisal of the relevant strategic policies in the Horsham District Planning Framework (HDPF), with reference to the forthcoming review of the HDPF and the South Downs National Park Local Plan.
21. However, there is a major potential weakness within Section 3. At present, there is barely any reference to national planning policies contained within the National Planning Policy Framework (NPPF) and the policy guidance contained in Planning Policy Guidance (PPG) and no reference to the need to promote and secure Sustainable Development. This will need to be addressed and we recommend that a new sub-section be drafted for Section 3 building upon the material presently at paragraph 3.2.
22. It would also be beneficial if the thread of promoting sustainable development could be carried through the Plan rather more conspicuously and two areas which would benefit from appropriate references would be in the supporting text to Policy 1 (A Spatial Plan for the Parishes) and as an additional paragraph in Section 5 (Implementation).
23. Section 4 (Vision Objectives and Policies) is of course the major component of the Plan, and we comment in detail on each of the Policies below. However, it would be useful if the policies could be presented in a text box format to distinguish them from the surrounding material and the titles of the policies be presented at a slightly larger font size, again to highlight them. The use of bold text for the Policies is helpful.
24. Section 5 (Implementation) does not need any significant additional work, apart from a reference to the need to achieve sustainable development (see paragraph 21 above) during the Plan period. However, it would be useful if the section could also contain a further reference to the commitment to review the Plan, or parts of the Plan, at a future date should circumstances necessitate such a review (as set out in paragraph 4.6).
25. Overall, our general comments on the Plan as a whole, as set out above, are intended to improve the document, and where necessary to add greater clarity. The most significant omission is the present lack of more direct references to the NPPF and its policies, the most important of which is to seek to promote and secure Sustainable Development. We do not identify any other potential weaknesses with regard to satisfying the Basic Conditions.

## 2) Detailed Comments

26. Our detailed comments on the Plan are set out below on a page by page basis for ease of reference:

- Page 5 - 1.3 – it might be useful to add a reference to the recently enacted Neighbourhood Planning Act, 2017 for completeness.
- Page 8 – 1.11 – the date will obviously need to be changed when the Pre-Submission Plan is finally published.
- Page 9 – 2.3 – some references to other key Evidence Base documents would undoubtedly assist an Examiner.
- Page 15 – 3.2 – we suggest that this forms the basis for a new sub-section addressing the NPPF.
- Page 15 – 3.3 – we suggest that this sub-section be headed “Horsham District Planning Framework”.
- Page 20 – 4.1 – Vision – This should state 2031 in Line 1 rather than 2032
- Page 20 – 4.2 – Housing – we would suggest that making a contribution to Horsham district’s wider housing need up to 2031 is an appropriate objective.
- Page 22 – Policy 1 (A Spatial Plan for the Parishes) – our only comment is that this policy is rather long, although it is addressing a number of different issues. The policy, as drafted, is not defective, but we comment that the final two paragraphs could form the basis of a separate policy addressing Countryside Protection and Green Gaps.
- Page 25 – Policy 2 (Site Allocations for Development) – this policy is too long as presently constructed, with Allocations i)-vi) spanning four pages, with intervening supporting text and justification. Our recommendation is that the policy text (i.e. the **bold** text) is consolidated into one block of Policy text, with the allocations simply listed as i)-vi) within it, with v) and vi) being identified as Reserve Sites. This should then be followed in paragraphs 4.24 *et seq* by the individual justification and notes relevant to each of the sites, with an appropriate reference to the Policies Maps. Whilst this may not shorten the total content of this important part of the NP, it will make it much clearer to an Examiner and users of the Plan which content is a Policy requirement.
- Page 29 – Policy 3 (Employment Uses) – our only comment on this policy is that the acceptable Employment uses are not defined in terms of the Use Classes Order. Our assumption is that they fall within Classes B1, B2 and B8, and if that is correct then it might be beneficial to state that in the Policy.
- Page 30 – Policy 4 (North Farm, Wiston Estate, Washington) – our only comment on this policy is that Clause iv) in particular might benefit from being linked to Uses Classes B1, B2 and B8. If retail uses (Class A) are to be acceptable, then it might be appropriate to state that fact.
- Page 30 – Policy 5 (Storrington Village Centre Retail Area) – in this policy, we note that the appropriate references are being made to the Use Classes Order, which assists in clarifying the purpose of the policy.
- Page 31 – Policy 6 (Development in Storrington Village Centre) – this policy introduces, for the first time in the NP, the Parish Design Statement. This Evidence Base document should be referred to in the supporting justification to the policy, at least as a cross reference to paragraph 4.66 where there is a fuller reference.
- Page 31 – Policy 7 (Washington Village Centre Retail Uses) – our only comment on this policy is to question whether Clause iv) is necessary, bearing in mind that the policy is addressing the Village Centre?

- Page 32 - Policy 8 (Creation of Sandgate Country Park) – there are two parts to the Sandgate Quarry site – the working quarry area and the area in the north where quarrying work has finished. Extant planning permissions for mineral extraction is currently permitted until 2042. In the northern part of the site restoration work and tree planting has already been carried out and this area has been designated as part of Phase 1 of Sandgate Country Park within the context of the Millford Grange development planning application. Proposed future phases of the development of the Country Park, may be some considerable time in the future and provisions for restoration of the quarry are, as identified, within the purview of the West Sussex Minerals Local Plan and do not need duplicating here. I would therefore, suggest that the policy and the accompanying text are better placed in a section of the Neighbourhood Plan entitled ‘Community Aspirations’ so that it is clearly distinguished from the other land use policies.
- Page 32 - Policy 9 (Tourist Accommodation) – Clauses iii)-v) in this policy should presumably be Clauses i)-iii)? If not, Clauses i) and ii) were missing from the draft that we reviewed.
- Page 33 – Policy 10 (Broadband & Mobile Communications) – as correctly stated in paragraph 4.56, the majority of telecommunications installations benefit from being Permitted Development. There are some exceptions to this, and the supporting text could refer to the more sensitive areas (e.g. South Downs National Park, Storrington Conservation Area) where the policy might carry greater weight.
- Page 33 - Policy 11 (Education Uses) – we recommend that the policy does not make reference to Key Stages 1-4, which, as these are not a planning consideration per se.
- Page 33 – Policy 12 (Recreation Facilities) – is a skate park the only additional recreational facility that will be supported at Storrington Recreation Ground? We suggest that the policy could be more generic in its support for additional facilities, citing a skate park as an example.
- Page 34 – Policy 13 (Allotments) – the question that is posed by this policy is “which body will *allocate* land for new allotments?”. It could of course be the Parish Council or Horsham District Council in terms of the formal planning sense of the word “Allocation”, or it could be a developer/private landowner as part of a planning permission. If the policy is solely intended to refer to the relocation of the existing allotments at Ravenscroft (c.f. Policy 2 iv), then the policy should be framed accordingly. If the policy is intended to support the more general provision of further allotments in the Parishes, then it should indicate which body or bodies will be encouraged to make allocations of land.
- Page 34 - Policy 14 (Design) – we question whether the second paragraph fully reflects or references the design criteria that might apply to new developments within the National Park area?
- Page 35 - Policy 15 (Green Infrastructure & Biodiversity) – our only comments on this policy are that “parish” in Clause iii) should be “parishes”, and that Clauses vii) and viii) could be combined into one clause. Clauses ii), iv) and vi) are also somewhat overlapping, and there could be scope to consolidate them.

- Page 36 - Policy 16 (Local Green Spaces) - the opening paragraph to this policy is unnecessary within the policy itself, and should be more appropriately placed as the opening part of the reasoned justification.
- Page 37 - Policy 17 (Air Quality) – the final sentence of paragraph 4.78 would appear to be the justification for Clause vi) of the Policy. If that is the case, it would be preferable if paragraph 4.78 could make that link more clearly.
- Page 38 - Policy 18 (Traffic & Transport) – we note that no policy in the NP presently addresses Public Transport. Whilst this may not be a major concern of the community, Policy 18 would be the appropriate policy in which to encourage support for further public transport services and facilities.
- Page 39 - Policy 19 (Car Parking) – our only comment on this policy is that an Examiner will probably wish to understand the position of West Sussex County Council, if there is a difference with that Council’s standards for residential development.

27. We note that each of the policies now contains a paragraph at the end of the supporting text stating that “the Draft SA report assesses this policy as.....etc.” (paragraphs 4.57 and 4.60 being two examples). Whilst it is useful to make this link to the SA report, we are somewhat concerned that some of the suggested mitigations set out very clearly in the Draft SA report are not being carried through into the Pre-Submission Draft. We refer to this in paragraph 10 above, and it potentially affects a large number of policies. As just one example, suggested mitigations to Policy 19 (Car Parking) are set out in paragraphs 7.51, 7.57, 7.64 and 7.69 of the Draft SA report. None of those mitigations are presently included within Policy 19 and in our view this will inevitably lead to an Examiner questioning whether the SA process has sufficiently informed the preparation of the NP in seeking to achieve sustainable development. It could potentially “devalue” the SA process, which as we have already noted has been a robust and thorough exercise.

## Conclusion

28. This Health Check has been undertaken rigorously and whilst our comments will require some additional work to be undertaken to the Pre-Submission Plan, they are all matters which will help to improve the Plan. We have no doubt that the Plan and its supporting Evidence Base is now in much better shape than was the position in early-2016 prior to the previous Examination. Whilst we cannot pre-empt the view that the appointed examiner will take and subject to the additional work set out in this note, we have not at this juncture identified any issues that should substantively result in the Plan failing the Basic Conditions and the other procedural legal requirements.

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