

STORRINGTON, SULLINGTON AND WASHINGTON NEIGHBOURHOOD PLAN REGULATION 14 CONSULTATION RESPONSES
FROM STATUTORY BODIES

NP Paragraph No/ Policy No.	Comments from	Regulation 14 comment	Steering Group Response
Forward	HDC	<p>Replace Paragraph 5 of the Forward with the following wording:</p> <p>Horsham District Council and the South Downs National Park Authority have provided the Neighbourhood Plan Steering Group with advice on how to address the concerns raised by the examiner in this revised plan and supporting documentation which will now be subject to another 6 week public consultation.</p>	This foreword will change with every step of the plan to reflect the stage it is at – however, accept HDC suggestion
Introduction Paragraphs 1.1 – 1.8	HDC	Paras 1.4 and 1.8- will need to be re-worded following referendum	Of course
Introduction Paragraph 1.8	HDC	Para 1.8 and many subsequent paragraphs should refer to Horsham District Planning Framework and not Horsham Local Plan.	Noted – to be amended
Introduction Paragraphs 1.9 – 1.11	HDC	Paras 1.9-1.11 to be amended/removed in next draft.	Noted
State of the Parishes Paragraph 2.7	HDC	Para 2.7- the Introduction to Parish of Washington needs a paragraph similar to 2.3 to introduce the stats. The first set of bullet points is missing the ‘demographics’ heading (as per para 2.4)	This has been provided by WPC

State of the Parishes Paragraph 2.15	HDC	This refers to the summary and discussions of each of the Focus Groups being set out below. These do not appear in the text and need adding.	Remove this reference “a summary of the discussions.....
State of the Parishes Paragraph 2.16	HDC	<p>Washington Strengths - reference is made here to a village shop, the examiner’s report says at para 9.39 that there are no shops in Washington, and Policy 6 of the Plan supports a village shop as there currently isn’t one). Paragraph 4.43 also states:</p> <p>“This policy encourages the provision of new shops including convenience store in Washington village which currently lacks such facilities to serve the local community.”</p> <p>The Plan is contradictory and needs to be clarified for consistency or else it could be challenged on this point.</p> <p>In bullet point 2 of Washington strengths add the following wording “located in the garden centre” after village shop.</p>	Wording to be added
Planning Policy Context Paragraph 3.3	HDC	<p>HDPF was adopted in November 2015. You should also add in the adopted General Development Control Policies DPD as this is relevant to the National Park.</p> <p>Para 3.3 - reference to the National Park development plan should be more flexible with the date of adoption - suggest ‘anticipated for adoption in 2017’.</p> <p>See comments made by the SDNP Authority</p>	OK

Planning Policy Context Paragraph 3.3	SDNP	The correct name for the emerging local plan being prepared in the South Downs Local Plan and it will now be adopted in 2018. Remove the words “National Park “ and update text.	OK
Planning Policy Context Paragraphs 3.4 – 3.7	HDC	Change paragraph order; it should start with the current paragraph 3.8 because the HDPF is the most up to date Development Plan and the one relevant to the majority of the NP area.	OK
Planning Policy Context	HDC	You should add in here a sentence to say that the way in which the housing numbers have been calculated is set out in paragraph 4.18.	OK but HDC were supposed to give an indication that the number of homes is acceptable.

Paragraph 3.5	HDC	<p>3.5- Discussion of the 1500 homes. At recent appeals and other appeal decisions much discussion is made of housing targets being minimums, and not ‘ceilings’, and of the need to not only meet these targets, but ensure that <u>local need is met</u>. In recognition of this, and to more accurately reflect HDPF policy 15, the second and third sentences of para 3.5 should be amended to read</p> <p><i>“...the HDPF makes provision for <u>at least 1500 homes</u> to come forward through Neighbourhood Plans. The contribution proposed by the SSWNP will contribute to meeting this target and is set at a level intended to meet identified local needs evidenced through the Housing Needs Surveys and through the capacity of land identified as suitable for development in accordance with the Plan’s Spatial Strategy”</i></p> <p>The last sentence should be deleted.</p>	ok
Planning Policy Context para 3.6	HDC	<p>Bullet 8- Amend this bullet to read:</p> <p><i>“Policy 15 – Housing Provision – requiring Neighbourhood Plans to make provision in total for at least 1,500 new homes in the Plan period, reflecting the position of settlements in the hierarchy of Policy.”</i></p> <p>Bullet 12- Amend this bullet to read:</p> <p><i>“Policy 27 Settlement Coalescence – protects landscapes from development which would result in coalescence of settlements and resists development between settlements which would generate urbanising effects in settlement gaps.”</i></p> <p>Bullet 13- Amend this bullet to read:</p>	OK

		<p>“Policy 30 – requires development proposals in or close to protected landscapes to conserve and enhance the area’s natural beauty.”</p>	
<p>Planning Policy Context para 3.8</p>	HDC	<p>You need to make reference the emerging WS and SDNP Minerals Plan. The draft plan has been out to consultation</p> <p>Add an additional paragraph 3.9 to reflect up to date policy position: “West Sussex County Council and the South Downs National Park Authority are preparing a Joint Minerals Local Plan which was published for consultation between 14 April and 17 June 2016. Whilst currently in draft form regard has been had to the emerging policies M9 (Safeguarding Minerals) and M24 (Restoration and Aftercare).”</p>	Ok
<p>Vision, Objectives and Policies Para 4.1</p>	SDNP	<p>Vision – called also refer to Landscape and Heritage</p> <ul style="list-style-type: none"> - Consider inclusion 	Ok

<p>Vision, Objectives and Policies para 4.2</p>	<p>HDC</p>	<p>Delete the following sentence:</p> <p>“No targets have been set for these indicators; progress will be judged against the trends that are indicated in the data when it is reported and reviewed.”</p> <p>The Housing Objectives need to be much more specific and linked to the evidence base.</p> <p>Bullet point 1 - What is the justification for stating the need for smaller private dwellings that are affordable for younger people or for those wishing to downsize? What evidence base is available to support the first bullet point? Have Housing Needs Surveys been carried out and of so what did they say? Add in links to where Housing Needs Surveys and other evidence (residents’ surveys etc.) can be viewed in bullet point 1.</p> <p>Bullet point 4 – The proposed allocated sites are not all located next to a Built Up Area Boundaries, the Washington sites are not for example nor is Chantry Quarry.</p> <p>Why have sites that are adjacent to the BUAB not been not be allocated? This has been queried in the representations made by ECE Planning regarding the Angell Sandpit.</p> <p><u>Comment</u></p> <p>The site assessment process was a major concern raised by the examiner who stated that the site assessment process had not been carried out correctly and was inconsistent. From the available evidence it appears that the sites have not been reassessed and therefore the examiner’s concerns have not been addressed.</p> <p>Para 4.2- Village Centre- Are there two village centres here (Storrington and Washington) in which case the paragraph needs to be amended to refer to villages in the plural.</p>	<p>OK</p> <p>HNS Surveys have been carried out and evidenced by community Survey and State of Parish report</p> <p>The Chantry Quarry is no longer in the Plan and the Plan allocates a settlement boundary in Washington</p> <p>Because they have not met the score criteria in other areas</p> <p>ok</p>
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Vision, Objectives and Policies para 4.2	SDNP	<p>Housing – Suggest last bullet includes “other than where essential for rural workers”</p> <p>SDNP and Landscape – Suggest first bullet includes “...and enhance the National Park and its setting in the wider landscape.” In accordance with NPPF para 55. There is a tendency for the document to safeguard the landscape of the National Park but not the wider countryside e.g the A24 corridor.</p> <p>Amend “to work with the SDNP” to SDNPA</p>	<p>OK</p> <p>OK</p> <p>OK</p>
Vision, Objectives and Policies para 4.8	HDC	<p>This paragraph is technically incorrect and should be amended to read as follows:</p> <p>“It is not the purpose of the SSWNP to contain all land use and development planning policies relating to the parishes. Once made, the SSWNP will become part of the “Development Plan” and will be used in conjunction with the HDPF for the determination of planning applications in Horsham district. Once adopted the South Downs National Park Local Plan will be used together with the SSWNP to assess planning applications within the National Park.”</p>	<p>OK</p>
Policy 1	HDC	<p>Paragraph 1 - Replace all references to brownfield land in the plan (fourth line down in Policy 1) with the term “previously developed land” in order to comply with the correct terminology in the NPPF.</p>	<p>OK</p>

Policy 1	HDC	<p>Paragraph 2 - The examiner concluded that the allocation of the sites in Old London Road failed the Basic Conditions tests on the grounds that it is not a sustainable location for development.</p> <p>However the wording of paragraph 2 has NOT been amended to take account of the examiner's comments (paragraphs 9.4 and 9.5. The Plan is therefore unlikely to succeed at a further examination for the same reasons.</p> <p>Paragraph 2 must therefore be rewritten as follows:</p> <p>"Development proposals for infilling outside the Built up Area of Washington will be supported provided these accord with the provisions of the Horsham District Planning Framework and the Neighbourhood Plan. Such proposals include:</p> <p>³⁵₁₇ Sites at Old London Road, Washington allocated in Policy 2</p> <p>³⁵₁₇ developments up to 5 dwellings and</p> <p>³⁵₁₇ the extensions to existing buildings"</p>	<p>Further site assessment work to be undertaken</p> <p>OK</p>
Policy 1	HDC	<p>Policy 1 – provide a map that shows the broad location of these green gaps or omit the first sentence of this paragraph. See Examiner's comments in paragraph 9.6.</p>	<p>Reference to the Proposals map has been removed</p>
Policy 1 para 2 (bold)	SDNPA	<p>Does London Road have a built-up area boundary? It is unclear from the map.</p> <p>A definition of what you consider "infill" would be helpful.</p> <p>It is worth noting that with an upper limit of 5 none of these infills</p>	<p>Noted</p>

<p>Para 3 (bold)</p> <p>Para 4 (bold)</p>	<p>SDNPA</p> <p>SDNPA</p>	<p>Would provide affordable housing because 5 is the threshold for the National Park and 10 elsewhere (ie the 6th or 11th dwellings respectively are the triggers). This is confirmed in the recently revised NPPG Planning Obligations.</p> <p>Extensions should be acceptable both within and outside the built up area and London Road.</p> <p>“control of development” suggest this phrase is replaced with “Management of” or it is deleted</p> <p>“Broad Location of green gaps” we are concerned that this will have little meaning / effect in practice unless shown on policies map. Gaps are also referred to in 4.14 as “defined”</p>	<p>Noted</p> <p>OK</p> <p>Refer to HDPF</p>
<p>Policy 1 para 4.11</p>	<p>HDC</p>	<p>Redraft this paragraph as follows:</p> <p>“The effect of the policy is to confine housing and other development proposals to within the built up area boundaries, unless they are appropriate to a countryside location. The position in the settlement hierarchy of Storrington & Sullington as a ‘Category 1 Settlement’ and its defined Built Up Area Boundary, were established</p>	<p>OK</p>

		by Policy CP5 and by the Proposals Map of the 2007 Horsham Core Strategy. Policy 3 of the adopted Horsham District Planning Framework (HDPF) defines Storrington and Sullington as one of the “Small Towns and Larger Villages” within the Settlement Hierarchy. The evidence base of the South Downs National Park Local Plan identifies Washington as a ‘Tier 4’ settlement in its settlement hierarchy.”	
Policy 1 4.13	SDNPA	We are still concerned that the housing provision relies heavily on the loss of employment which could run counter to the concept of a mixed and balanced sustainable community. We are aware that this is being tested through the application on the Paula Rosa site.	Noted
Policy 1 para 4.14	HDC	<p>Bullet 1 – Delete the wording “or a brownfield site within close proximity of the boundary.”</p> <p><u>Reason</u> HDC are concerned that a brownfield (see earlier comment re: definition) site ‘within close proximity’ of BUAB could be included in a BUAB modification. If a site does not adjoin a BUAB boundary the undeveloped land between the site and the BUAB will be included in BUAB by default and should therefore be allocated. Allocation of sites not adjacent to the Built Up Area Boundary would also be in conflict with Policy 4 of the HDPF.</p> <p>Bullet 3- Delete the current wording and replace with: ‘The site respects existing settlement patterns and does not create or add to urbanising effects in land separating existing settlements’</p> <p>Bullet 5 – It is unclear what this means</p>	<p>Any reference to Brownfield in the plan will be replaced with “previously developed” land</p> <p>OK</p> <p>Bullet 5 has always been there and never queried</p>

Policy 1 para 4.14	SDNPA	"Defined" Green gaps – where are these defined	review
Policy 1 para 4.16	HDC	<p>It is noted that the Neighbourhood Plan is proposing a new settlement boundary around Washington. It is not possible for the Council to support this approach as it is not in conformity with the strategy set out in the Horsham District Planning Framework or the Core Strategy (which applies to Washington village). HDPF Policy 3 and CP5 of the Core Strategy are both predicated on providing housing through infilling within towns and villages which have defined BUABs, and these settlements are identified in the respective documents. The land in question is an 'unclassified settlement'.</p> <p>Outside the areas with a BUAB, HDPF policy 4 (as the land is not in the National Park) then sets out criteria by which settlement boundaries can be extended. This requires a particular site / allocation to adjoin an existing settlement edge (which in planning policy terms is deemed to be the BUAB). The proposed approach would alter the settlement hierarchy set out in the Policy 3 / CP5, and does not adjoin a defined settlement edge as per policy 4.</p> <p>The approach proposed by the Parish Council has already been tested at Examination of the Nuthurst Neighbourhood Plan, which sought to create new settlement boundaries and was not found to be in conformity with the HDPF or Core Strategy (which was at the time the adopted development plan).</p> <p>The Examiner stated: "Drawing development boundaries around small groups of dwellings which are otherwise set in the countryside is a significant departure from the approach taken in the development plan." "I do not consider that drawing settlement boundaries around these hamlets is in general conformity with the settlement hierarchy policies of the development plan. Not only that but the application of draft HDPF policy 4 will not require the drawing of such boundaries"</p>	

		<p>He concluded that some development would however be possible in these smaller hamlets through infilling as “the concept of infilling is a long-established one in planning policy interpretation although a definition is required of the words ‘very small scale’ infilling”</p> <p>Therefore whilst it will not be possible to draw a settlement boundary around the area in question, this does not rule out the potential for some small scale infill development taking place on the land in question providing that there is evidence to justify this. To assist with this, the Steering Group will need to demonstrate to an Examiner that there are no other sites available for development within or adjoining Washington village, (potentially looking at the scale of development envisaged in the draft South Downs Local Plan), and that the proposals are of a scale to be considered infill development.</p>	<p>It is clear that further site assessment work is necessary - without these two sites Washington would not be contributing any sites and would not be meeting the requirements of the Housing Needs Survey. All other sites submitted in Washington are totally inappropriate.</p>
<p>Policy 1 Para 4.16</p>	<p>SDNPA</p>	<p>This is the only mention of a “settlement boundary” which elsewhere is referred to as the Built Up Area Boundary. The naming of this should Be consistent to avoid confusion. Replace “Settlement Boundary” with “Built up Area Boundary”</p>	<p>Noted</p>

<p>Policy 1 para 4.18</p>	<p>HDC</p>	<p>HDC will redraft this paragraph once the housing number has been agreed – this will change once the planning permission for the Paula Rosa site is granted.</p> <p>Refer back to paragraph 3.5 and amend to read as follows: In overall terms, the indicative total number of houses specifically provided for in the SSWNP is approximately Insert revised figure over the Plan period. This figure has been derived by the amount of land allocated for housing in the plan brought forward through the site assessment process and based on an average density of 26 dwellings per hectare. In reality more dwellings are likely to come forward through windfall sites and the total housing provision would be greater than the actual need for housing identified in the Housing Needs Survey.</p> <p>The Housing Needs Surveys conducted in both parishes identify a need for 84 homes in Storrington and Sullington and 13 homes in Washington</p> <p>This quantum of development is considered to strike the right balance between meeting local housing need (and contributing to the proposed HDPF housing supply strategy) on the one hand and reflecting the environmental constraints of the parishes on the other. As the policy allows for sustainable development proposals in the form of windfall and other sites within the boundaries, the total number of dwellings consented over the Plan period will be greater than the numbers resulting from the allocations of the SSWNP.</p> <p>Delete this paragraph and replace it with the following:</p>	<p>Plan to reflect the up to date status of the Paula Rosa site</p> <p>These HNS Surveys are available on the Parish Council websites</p>
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		<p>“The results of the two Housing Needs Surveys together with the capacity of the sites allocated for development have been given consideration in determining the housing need for each parish. An average density figure of 26 dwellings per hectare has been used to calculate the capacity of each site. In overall terms, the indicative total number of houses specifically provided for in the SSWNP is approximately ????? over the Plan period. This quantum of development is considered to strike the right balance between meeting local housing need and contributing to the proposed HDPF housing supply strategy on the one hand and reflecting the environmental constraints of the parishes on the other. There is no residential development planned for in the National Park. As the policy allows for sustainable development proposals in the form of windfall and other sites within the boundaries, the total number of dwellings consented over the Plan period will be greater than the numbers resulting from the allocations of the SSWNP.”</p> <p><u>Comments</u></p> <p>The housing numbers need to be recalculated to take account of the planning permission for the Paula Rosa site and the removal of the Bax Close site from the Plan. In addition it is unclear how the density figure of 26dph has been calculated and whether a deduction (33%) of the site area has been applied to take account of the provision for infrastructure e.g. roads.</p> <p>HDC Officers have re-calculated the potential capacity of all of the proposed sites allocated under Policy 2 using two scenarios:</p> <p>³⁵/₁₇ 30dph (generally applied by HDC);</p> <p>³⁵/₁₇ 26 dph (figure used by PC)</p> <p>In both cases 33% of the site area has been deducted to allow for the provision of infrastructure.</p>	<p>OK</p> <p>See previous comments</p>
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Policy 2 Site Allocations for Development	HDC	Policy 2 – Refer to the HDPF by name rather than just the ‘Horsham Development Plan’ Omit the last sentence of paragraph 2 as this should be included in paragraph 4.18.	OK
Policy 2(i)d – Land at Robell Way	HDC	Delete this policy from the Plan.	See previous comments
Policy 2(i)d – Land at Robell Way	WSCC	References are made in the policy to improvements being made to Robell Way and other local roads and junctions to the satisfaction of the Local Highway Authority. The need for improvement would need to be considered as part of any Transport Assessment submitted in support of any planning application.	Noted
Policy 2(ii) – Land at Old London Road	HDC	Paragraph 4.24 – Delete this paragraph and replace with: “This vacant site is well suited for development as an infill site given the location of residential properties along the northern and western boundaries of the site. A residential scheme comprising approximately 10-15 dwellings will reflect the density and complement the existing pattern of development off London Road.”	OK
Policy 2(ii) Land at Old London Road	SDNPA	This is located outside of SDNP but as a general point we consider that they are well away from services and as such we again question their Sustainability.	See previous comments re site assessment work
Policy 2(ii) Land at Old London Road	WSCC	Luckings Yard and The Vineyard, Old London Rd. If both these sites were allocated safety issues with the increased use of the existing Old London Road/ Rock Road Junction should be considered.	Noted

Policy 2(iii)a – Land off North Street	HDC	<p><u>Comments</u></p> <p>It is understood that Offices from Parking Services are due to meet with the Parish Council within the next few weeks to discuss the Council's new Parking Strategy and this will form the basis for discussion with regards the detail of access to the site through the public car park..</p>	Ok
Policy 2(iii)a – Land off North Street	WSSC	<p>Concerns were raised and an application for sheltered housing refused on safety grounds due to pedestrian access via the existing car park. If access is to be taken via the car park, improvements would be necessary for pedestrians.</p>	Noted
Policy 2(iii)b	HDC	<p><u>Comments</u></p> <p>Policy 2(iii) (b) - most of the site is in Flood Zone 2- can you confirm that the Environment Agency have no objection with this allocation?</p> <p>The EA Standing Advice on residential development in FZ2 will have major implications on the design and layout of the site. The EA advice will require setting internal ground floor levels 30 cm above ground level of the site or 60cm above estimated flood levels (whichever is highest). This could lead to high or poorly proportioned buildings, which might conflict with the Conservation Area protection element of the allocation.</p> <p>HDC has reassessed this site and on the basis of the flooding constraints the level of development should be reduced from 20 to 10.</p>	<p>See comments from EA</p> <p>Noted to be reviewed as part of the site assessment work</p>

<p>Policy 2(iii) Land off North Street</p>	<p>Environment Agency</p>	<p>We note and support that you have reworded criteria b of the policy relating to Land off North Street (Old Ryecroft Allotments).Based on the environmental constraints within the area, we only have detailed comments to make in relation to this site. We would recommend that within the</p> <p><i>Table D: Summary Assessment of Proposed Policy 2 Allocations</i> on page 12 of the Draft Sustainability Appraisal/Strategic Environmental Assessment that you refer to the actual flood risk on the site, not just that it adjoins an area of known flood risk.</p> <p>In accordance with the National Planning Policy Framework (NPPF) Para 100-102, we recommend the Sequential Approach is undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk.</p> <p>We support the inclusion of Objective 8 in the <i>Table A: Neighbourhood Plan SA/SEA Framework</i> however are confused by the inclusion of 8A - <i>Will the Plan avoid allocating development on land subject to flood risk?</i> We would recommend that no allocation should be made in land subject to flooding to comply with local and national planning policy.</p>	
<p>Policy 2 (iii) – Paragraph 4.25</p>	<p>HDC</p>	<p>Amend the final sentence to state 10 dwellings and not 20.</p>	<p>See above</p>

<p>Policy 2(iv) – Land at Chantry Lane Industrial Estate</p>	<p>HDC</p>	<p>The Examiner raised concerns about the inclusion of this site as an allocated site for employment/residential uses in the Plan (paragraph 9.49 refers). The allocation of this site for this site now for housing does overcome some of the examiner’s previous concerns. However bullet point iv of the examiner’s report expresses concern regarding the lack of a “sufficiently robust evidence base to assess whether the allocation proposed is acceptable in principle, bearing in mind the location of this site at a particularly sensitive location.”</p> <p>Having regard to the Examiner’s comments HDC considers that evidence should be sought from the landowners to address this issue. The landowners should commission an independent Heritage Report as part of the evidence base to ensure that the site is developable, before this site is allocated in the NP.</p>	<p>The site met the score criteria and there is sufficient information in the Site Assessment Report to support the allocation.</p> <p>Such a report should be part of the evidence base of a planning application – not the Neighbourhood Plan site assessment process.</p>
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Policy 2 (iv) para 4.26	HDC	HDC are advised that the Chantry Lane Industrial Estate is fully occupied. HDC to clarify the position with PC.	HDC confirm that it is not fully occupied
Policy 2 (iv) Land at Chantry Lane	WSSC	The existing A283/Chantry Lane junction has restricted visibility to the east. It is not suitable to accommodate any significant increase in vehicular activity in its present form. The junction would need to be suitably improved or a new access formed onto the A283 to the east of the village. This access could then serve the residential use and the tourism development indicated. Access for non-motorised users would also need to be carefully considered and provided for. Ideally this would be provided for within the development site as the potential for improvements alongside the existing A283 is limited. A Transport Assessment would be required, which would need to consider the potential for capacity issues within Storrington. This may in turn require specific mitigation.	Noted – to be discussed with landowner -

<p>Policy 2 (iv) Land at Chantry Lane</p>	<p>WSSC Continued</p>	<p>The Chantry Quarry site is a current minerals working site and an extension area is currently being considered for inclusion in the Minerals Local Plan. The existing mineral working area is safeguarded by the existing Minerals Local Plan and is likely to continue to be safeguarded in the new Plan. As set out above the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals. These documents include the West Sussex Waste Local Plan, Minerals Local Plan and West Sussex Transport Plan. The policy regarding tourism development at Chantry Quarry has been removed however are mindful that development through policy 2 'Land at Chantry Lane Industrial Estate' or the new Tourism Accommodation policy, Policy 8 could affect the quarry site.</p> <p>The South Downs National Park may comment as an allocation for extension of the site would be within the South Downs National Park area. We would not wish to see a potential extension of the site for minerals working be deemed unsuitable due to such a policy, however do not consider at this time that the policies in the Neighbourhood Plan would preclude an extension. Any development would need to consider potential minerals deposits and provisions for restoration of the site.</p> <p>Policy 2 iv – It is requested that the following is added to the policy <i>'The design of the scheme has regard for the Chantry Lane Quarry, which is safeguarded by the Minerals Plan for West Sussex'</i> similar to the reference in policy 7. References to the Minerals Plan should be referred to as 'the Minerals Plan for West Sussex' this will ensure the document, now and in the future, relates to the most up-to-date Minerals Local Plan be it the current 2003 adopted document or in the future the Joint Minerals Local Plan once adopted. This change is needed in policy 7.</p>	<p>Noted</p> <p>See comments from SDNP</p> <p>Further site assessment work to be carried out</p>
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<p>Policy 2 (iv) Land at Chantry Lane</p>	<p>SDNPA</p>	<p>Again the loss of rural employment land is a concern and should be referenced back to an Employment Land Review. At para 4.28 the term “transition from urban to rural” could be made more precise. The site is within the rural area not the built up area. It is also within or adjoins the SDNP. Hence it is not transition from urban to rural which would be called for but harmony between new development and its rural location.</p> <p>In addition it is also important that the access is mindful of the character of rural roads, avoiding over-urbanisation of these (pavements, lights, signs). The requirement for a Landscape Character Assessment to accompany any proposal at Chantry Lane Industrial Estate is welcomed.</p>	<p>Noted</p> <p>Noted</p>
<p>Policy 2 (iv) Land at Chantry Lane</p>	<p>CPRE</p>	<p>3.1. This site lies outside of Storrington’s existing built-area boundary and is juxtaposed between the South Downs National Park, which adjoins it on three of its four sides, and the Site of Special Scientific Interest (SSSI) on the fourth side, part of which lies within the National Park, and the Grade II Listed Chantry Mill. Consequently, the allocation is in a particularly sensitive-to-development location.</p> <p>3.2. There is an untested presumption by the Pre-Submission Plan that through compliance with the planning provisions listed at ‘Policy 2 iv, (page 25) the proposed development would not compromise the character and setting of the SDNP, would not be detrimental to visitors’ experience of the SDNP, and would neither cause significant harm to the setting of the Listed building nor be detrimental to the SSSI, part of which lies inside the National Park.</p> <p>3.3. This is a huge presumption, given that the SDNP, SSSIs and Grade II Listed buildings and their settings have high level protection through both the planning and legal systems.</p> <p>3.4. We therefore ask that the proposed development be withdrawn from the Plan.</p>	

Policy 2 (v) a – Allotments off Ravenscroft	HDC	Storrington has a slight shortfall of allotment provision. Therefore can the loss of the allotments be justified? Can they be re-provided where there is demand elsewhere in the village? Are they well used? What condition are they in? HDC to discuss further with PC's.	The allotments are not being lost – they are being relocated as part of the policy. WSCC owns the land and has approached the PC with this suggestion in the past.
Policy 2 (v) para 4.29	HDC	Para 4.29- "Its design reflecting its location in the setting of the National Park", was better expressed at para 4.28, "an Integrated Landscape Character Assessment to accompany a planning application should set out how the transition from 'urban' to the 'rural' of the National Park will be successfully achieved."	OK to change
Policy 2 (v) Ravenscroft Allotments Para 4.29	SDNPA SDNPA	Criterion b should stress need for comprehensive development, otherwise there is a risk of developers chunking up the site to avoid affordable housing threshold. Para 4.29 states that the allotments are to be located on land to the south ie SDNP land but later refers to it being nearby (policy 13). This needs to be clarified and tested ideally through pre-app noting that allotments per-se may be agricultural use. If it were not acceptable to the SDNPA this could affect soundness of the site	Noted
Policy 2 (vi) – Land off Old London Road Washington	HDC	Subject to the SA results this site may have to be withdrawn from the Plan. It might be more appropriate to allocate this site for employment uses only. Notwithstanding the above, the policy needs to be redrafted following discussion with HDC to be more explicit as to where the housing and employment uses would be located on the site	Further site assessment work to be undertaken

Policy 2 (vi) – Land off Old London Road Washington	SDNPA	This is located outside of SDNP but as a general point we consider that they are well away from services and as such we again question their Sustainability.	See above
Policy 2 (vi) – Land off Old London Road Washington	WSCC	Luckings Yard and The Vineyard, Old London Rd. If both these sites were allocated safety issues with the increased use of the existing Old London Road/ Rock Road Junction should be considered.	Noted
Policy 2 (vi) para 4.30	HDC	Redraft as follows: “The site is currently used for employment purposes but is not identified as a key employment area. The site comprises previously developed land and a more efficient use of the site would enable the retention/redevelopment of employment uses and approximately 20 dwellings. The scheme adjoins the National Park (along its western	

		boundary) and the scheme should reflect that in its design. An Integrated Landscape Character Assessment to accompany a planning application should set out how the transition from 'urban' to the 'rural' of the National Park will be successfully achieved."	OK
Policy 2 paragraph 4.32	HDC	<p>Insert additional text:</p> <p>"In order to ensure that future housing need is addressed the Plan proposes to allocate two reserve sites for housing which are unlikely to come forward in the near future, but may become available during the Plan period.</p> <p>This is compliant with the advice contained in Paragraph 9 of the Planning Practice Guidance."</p>	OK
Policy 2 (viii) para 4.32 and 4.33 – Land at the Post Office Depot, High Street, Storrington	HDC	<p>HDC notes that comments have now been received from Royal Mail regarding this proposed allocation which has indicated that they are generally supportive of the policy and therefore it can remain within the NP. However they have formally request some alterations to the wording of the policy to facilitate the relocation of the existing Delivery Office.</p> <p>HDC to discuss this further with the PC's.</p>	SG to clarify the area that has been put forward as it is the sorting depot accessed from North Street, not the buildings that front on to the High Street.
Policy 3: Employment Uses	HDC	<p>Delete the reference to North Farm.</p> <p>HDC agrees with the SDNP comment that there should be a separate policy for North Farm which will not replace employment uses such as Paula Rosa. The policy should be in the employment section but after the allocations and it should identify North Farm as an opportunity area for the development of businesses, including tourism that support the rural economy and are consistent with the principals of the SDNP. It should make reference to the emerging Whole Estate Plan and include the following bullet points:</p>	

	HDC	<p>³⁵₁₇ They do not have a greater impact on the open countryside and conserve the landscape and beauty of the South Downs National Park ;</p> <p>³⁵₁₇ Replacement buildings are not materially larger than the ones they replace;</p> <p>³⁵₁₇ The landscape scheme is able to mitigate any impacts on the street scene, local amenity and the countryside.</p>	noted
Policy 3: Employment Uses para 4.36	HDC	Delete references to North Farm.	Ok

<p>Policy 3: Employment Uses</p>	<p>SDNPA</p>	<p>North Farm - This is clearly a very sensitive location for the extension and intensification of employment. It poses risks to the SDNP in terms of loss of tranquility and damage to the rural character of the area at a very narrow part of the National Park.</p> <p>Bullet ii inadvertently suggests that only the landscape value of the Park is important. Suggest the following wording <i>“They conserve or enhance the rural landscape of the A24 corridor. Where that corridor is also within the National Park, development should also meet the purposes of the National Park”</i></p> <p>Having met with the Wiston Estate we consider that a separate policy addressing this site should be included in the NDP. We would like to see reference to development of the site being part of a Whole Estate Plan or other comprehensive review of the Estate’s long term future. It should demonstrate how the development of the site will contribute to the purposes and duty of the National Park. We have no doubt that this is the intention of the Estate but as written the policy relates to standard forms of Employment development, particularly to the replacement of employment land being lost to housing within Storrington. This is not the case. The future of this important site needs very careful consideration which goes beyond a standard application for employment type uses. If handled well it has the potential to be a real asset to Washington and the SDNP</p>	
<p>Policy 4 Storrington Village Centre Retail Area</p>	<p>HDC</p>	<p>Policy 4 Delete the first part of this policy and replace with:</p> <p>“The primary retail area in Storrington, as defined on the Horsham District Planning Framework Proposals Map, will be retained for the uses defined in Class A of the Town and Country Planning Use Classes Order i.e. shops, financial and professional services, food and drink, drinking establishments and takeaways.” Proposals for change of use of first and upper floors above shops for Class B1 (a) offices will be supported.</p>	<p>OK</p>

Policy 5 Para 4.43	SDNPA	Policy 20 referred to by mistake – amend error It might be worth mentioning that some changes to /from retail may be permitted development	noted
Policy 6 Washington Village Centre Retail Uses	HDC	Delete the first part of the policy and replace with: Proposals for the development of or change of use to shops (Use Class A1) to meet a local need will be supported provided they have regard to: Insert after the bullet points: Development for large out of town retail outlets will not be supported.	OK
Paragraph 4.44	HDC	Add following sentence to end of paragraph: However proposals for larger out of town retail uses are not considered appropriate in this rural location.	OK
Policy 7	SDNPA	The SDNPA would encourage heathland restoration of the site, as this relates to the SDNPA’s current Heathlands Reunited project which seeks to create a heathland habitat corridor – consider including an aspiration to restore heathland on the site in the supporting text.	noted

Policy 8	SDNPA	The policy should more closely reflect the emerging South Downs Local Plan policy SD20 Sustainable Tourism and Visitor Economy, particularly in regard to encouraging use of sustainable transport and year round visitor economy. The provision of parking should include the need for bicycles. Consider including additional wording relating to sustainable transport and year round visitor economy, particularly where the development is within the National Park.	noted
Policy 9	SDNPA	Most broadband and telecommunications infrastructure installations fall within permitted development and the policy is therefore of limited use. Remove policy but consider including wording limiting the prominence of broadband and telecommunications installations in the supporting text	review

Policy 10 Education Uses	HDC	Paragraph 5.52 – Delete from the fourth line downwards where it begins: “At the time....”	SG to review wording
Policy 10	WSCC	Again it is requested that paragraph 4.52 is removed and replaced with the revised paragraph set out below <i>‘4.52 This policy supports development proposals to build new and extend local schools in the area. The existing facilities and uses already benefit from the protection offered by Policy 14 of the Horsham Core Strategy (and by Policy 41 of the HDPF). The local schools are popular in serving the villages and surrounding area. Following a formal representation period between 19 May and 16 June 2016, the proposal to discontinue Rydon Community College from 31 August 2017 and reopen the provision for Years 7 and 8 as an annex to Steyning Grammar School on 1 September 2017 was confirmed by the County Council. Rydon Community College will therefore close with effect from 31 August 2017. At the end of the consultation period the decisions regarding the move of Year 6 to the First Schools in Storrington and the surrounding areas, therefore creating Primary Schools, and the relocation of Thakeham Primary School to the Rydon site, will take effect from September 2017.</i>	See above
Policy 13 Allotments	HDC	See previous comments on the allotments issue – Policy 2 v	See SG’s response
Policy 14	SDNPA	The National Park is now an International Dark Sky Reserve. Include reference to the International Dark Sky Reserve in the supporting text	noted
Policy 15 Green Infrastructure and Biodiversity	HDC	Redraft this policy in accordance with paragraph 9.60 of the Examiner’s report.	OK

Policy 15	SDNPA	<p>No reference to sustainable drainage schemes in the general, or site specific policies have been found in the plan. Suggest that as part of the Green Infrastructure Policy a bullet point is included which says:</p> <p><i>“Landscape design proposals should seek to create multifunctional networks of spaces and features which connect with surrounding and existing biodiversity corridors. Connections to the existing footpath And cycleway networks should be prioritized to ensure that new schemes are walkable and cyclable where possible. New footpath and cycling routes should be included in any masterplanning process. Sustainable urban drainage measures should be integrated within the landscape design as part of a multifunctional layout. Where possible this should incorporate local appropriate surface water features.</i></p>	
Policy 15	CPRE	<p>2.1. We ask that Policy 15: Green Infrastructure & Biodiversity include the specific requirement that all development schemes should result in biodiversity gains and that applications will be required to demonstrate how those gains will be obtained and ensured.</p> <p>2.2. Enhancing as well as conserving the natural environment is one of the NPPF’s 12 ‘Core Planning Principles’ (NPPF paragraph 17: seventh bullet).</p>	noted

<p>Policy 16 – Local Green Spaces</p>	<p>HDC</p>	<p>The Examiner commented that the LGS Study should contain paragraphs to describe each of the sites proposed to be designated as LGS. The LGS Report dated June 2016 does address this point and is a robust piece of work, however it is still unclear how each of these sites have been considered against paragraphs 76,77 and 78 of the NPPF. The report just says “During its meeting of 24 March 2015 the SSWNP Steering Group agreed that the 24 areas listed below met the criteria above and should be designated as Local Green Spaces in the NP.</p> <p>This will need to be addressed in order to ensure the Plan is not challenged on this point.</p> <p>HDC to discuss further with the PC’s.</p>	<p>The Local Green Spaces report will be reviewed</p>
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Policy 16	SDNPA	On page 4 of the local green spaces report, there is reference to the Glebe Field site being omitted at pre-submission and subsequently included on the list of Local Green Spaces as no 25 in the submission version of the Plan. However this is not evident on the submitted list on page 24. Include the Glebe Field under the list of Local Green Spaces.	It seems that the Author is referring to a previous version of the Local Green Spaces report – the Glebe Field is clearly listed in the Plan under no.24
Policy 17 Air Quality	HDC	Delete the first sentence of the policy and replace with the following: Development proposals for medium and major developments as defined in the Horsham District Council Planning Advice Document Air Quality & Emissions Reduction Guidance will be supported provided that:	OK
Policy 17	WSCC	Point of detail / clarification There is reference to the pooling restrictions of S106 developer contributions, only five contributions can be pooled towards a single infrastructure project, not four.	OK

Policy 18 (i) Traffic and Transport	HDC	Policy 18(i) - In what circumstances might it be appropriate to require development to contribute towards creation of a new network of cycle paths between villages and their adjoining parishes? You might be able to require development sites to be linked to villages by new cycle and pedestrian routes, but stand-alone links between villages would not be necessary to make development acceptable. The NP could identify their proportion of CIL for such infrastructure provision but we could only require s106/use CIL to link sites with the village(s).	Noted
Policy 18	WSCC	It is considered that policy ii should be all non-motorised modes rather than just cycling, and to recognise that connecting up existing paths can bring considerable benefit, such as those across the A283.	OK
Policy 17 & 18	SDNPA	What scale of development do these policies apply to? Needs to be proportionate (eg nationally an air quality assessment is only needed for major development (10 dwellings + or 1000 sqm commercial, sitto transport assessments, although a lesser transport statement can be required for smaller cases, on merit). – Clarify requirements	All of our development sites are for 10 or more dwellings and therefore these requirements apply
Policy 19	HDC	add on to the final sentence ‘where they accord with all others aspects of the SSWNP and HDPF’?	OK
Policy 19	HDC	This is more stringent than the WSCC Parking Demand Calculator, particularly for small houses, you will therefore need to demonstrate with evidence that the approach in the policy can be substantiated if not the policy should be reworded to state that proposals should accord with WSCC Parking Standards.	See WSCC comments

Policy 19	WSSC	As set out previously, this policy aims to set minimum car parking standards for new residential development. Whilst it is agreed that parking should not add pressure to the highway network, in some cases this policy could lead to an oversupply. It is suggested that the policy is less prescriptive to ensure that there is more flexibility over how the spaces are provided. Please refer to the County Council's Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator for residential units and Parking standards and transport contributions methodology supplementary planning guidance for nonresidential development, which can both be accessed via the following link: http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx	SG to review policy
Policy 19	SDNPA	No mention of multi-modal – cycle parking. High parking standards will work against dense development in sustainable centres. If this is due to evidence of high ownership levels and low accessibility by other modes, this needs to be evidenced	OK
Implementation (Infrastructure) Para 5.4 – 5.6	SDNPA	5.4 – 5.6 should refer to the role of SDNPA in CIL and 106	Noted
Maps		It would be helpful to indicate the national Park boundary on all maps where applicable and that map 5 is entirely within the National Park	To be reviewed

Maps	CPRE	<p>1. The boundary of the of the South Downs National Park (SDNP) should be clearly marked on all relevant maps.</p> <p>1.1. We ask that the boundary of the SDNP and the boundaries of Sites of Special Scientific Interest (SSSI) be clearly marked on all SSWNP policy maps, in order to inform users of the Plan the whereabouts of these sensitive areas and their positions relative to the sites allocated for development. It is particularly unfortunate and potentially misleading that these key boundaries are not shown on the 'Policies Map & Insets' at page 38 and Policies Map Inset</p>	To be reviewed
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General Comments	SDNPA	<p>There is no reference to views to and from the SDNP in the document which is an important aspect of the settlements' relationship with the SDNP – consider including views as a general policy “ Views to and from the surrounding countryside are important to local people and contribute to the identity and quality of life in the settlements. New development shall protect these views and also identify through a robust masterplanning process where new views to the surrounding countryside can be provided through the design and layout of streets and spaces”</p> <p>The schedule of evidence documents refers to the SDNP AONB Management Plan – AONB should be removed.</p> <p>Schedule of Evidence – The South Downs Integrated Landscape Character Assessment 2011 should be included.</p>	<p>SG to consider (might allay the issues regarding the comments relating to the fields adjacent to Sullington Lane)</p> <p>OK</p> <p>OK</p>
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General Comments	WSCC	<p>In general, the County Council looks for Neighbourhood Plans to be in conformity with the District and Borough Councils' latest draft or adopted development plans. The County Council supports the District and Borough Councils in preparing the evidence base for these plans and aligns its own infrastructure plans with them. The County Council encourages Parish Councils to make use of this information which includes transport studies examining the impacts of proposed development allocations. Where available this information will be published on its website or that of the relevant Local Planning Authority. In relation to its own statutory functions, the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals. These documents include the West Sussex Waste Local Plan, Minerals Local Plan and West Sussex Transport Plan. It is also recommended that published County Council service plans, for example Planning School Places, are also taken into account.</p> <p>Small Scale Housing Sites Given that the Submission Neighbourhood Plan for Storrington & Sullington and Washington includes the proposed allocation of small scale housing sites, it should be noted that site specific principles in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on all site specific principles at this stage. In considering site specific principles, please refer to the attached Development Management guidance.</p> <p>The County Council currently operates a scheme of charging for highways and transport pre-application advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure through the following link:</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
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General Comments	WSSC Continued	<p>Air Quality The District Council implement and monitor the measures within the Air Quality Action Plan so may wish to comment on the increased traffic movements and how this affects the action plan for the Storrington Air Quality Management Area.</p> <p>Community Infrastructure Levy Under section 5 'Implementation' the plan refers to planning obligations and Community Infrastructure Levy payments from development. It should be noted that no mechanism currently exists for prioritising infrastructure needs across different public services and allocating funds to priority projects. The County Council is working with Horsham Council and other Local Planning Authorities to develop a robust mechanism and establish appropriate governance arrangements to oversee the prioritisation of infrastructure across different services. This will be important to secure delivery of priority projects and the County Council would welcome the Council's support for establishing appropriate decision-making arrangements.</p>	<p>Noted</p> <p>Noted</p>
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General Comments	Natural England	<p>Thank you for giving Natural England the opportunity to comment on the Storrington & Sullington and Washington Neighbourhood Plan. My brief comments are as follow</p> <p>Generally we agree with the findings of the SEA in terms of potential impact on the natural environment and, as it stands, the Plan is unlikely to have significant effect on any internationally designated site.</p> <p>We welcome the commitment to work with the South Downs National Park Authority and defer to their opinion on landscape impacts</p> <p>It should be noted that there may be protected species using proposed sites and that where this is known or suspected, appropriate surveys should be undertaken prior to development. In addition, reference should be made in the plan to the need for similar surveys of windfall sites known/likely to be used by protected species, prior to determination of planning applications, to inform any decision. Care is needed, particularly on rural sites, where there are old or derelict structures and which include (or are close to) features such as mature trees, ponds, ditches and field boundaries, where protected species may be present. Their protection should be one of the central considerations at the detailed planning stage, and early reference to biological records would clarify where these issues may be acute.</p> <p>There is currently significant pressure from consultations on land-use proposals and appeals, the completion of local plans, the review of existing plans and work on neighbourhood plans (there are over 500 parishes in Kent and Sussex). This makes it difficult to devote the time that consultations deserve. If there are issues I have not covered, please let me know and I will respond as quickly as possible.</p>	<p>Noted</p>
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