



Storrington and Sullington and Washington Neighbourhood Plan

SITE ASSESSMENT REPORT

January 2018



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1. Purpose

- 1.1 This report and its appendices forms part of the evidence base for the Storrington and Sullington and Washington Neighbourhood Plan. The Neighbourhood Plan covers the parishes of Storrington and Sullington as well as Washington for the period to 2031. A Steering Group is leading the project to develop the Plan on behalf of the Parish Councils.
- 1.2 To meet the local housing needs for new homes the Neighbourhood Plan will make a series of housing site allocations. In addition, the Plan also allocates land for employment. The purpose of this report, therefore, is to assess the potential sites in the Plan area and set out the Steering Group's recommendations for the allocation of land for housing and employment.

2. Planning policy background

- 2.1 The parishes are within the southern part of Horsham District. The southern part of the Plan area, including the whole of Washington village, lies within the South Downs National Park. The Horsham District Planning Framework (HDPF) forms the Local Plan for the parts of the Plan area that fall within the Horsham District. The HDPF does not include a total for the number of houses that should be built in these two parishes. It makes provision for at least 1,500 homes to come forward as a result of neighbourhood plan allocations across the district. The allocations proposed by the SSWNP will contribute to meeting this target and are 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.
- 2.2 Policy 2 of the HDPF sets the broad strategy for development in the district. It allows for growth in settlements according to a settlement hierarchy. This should be at a scale which is appropriate to retain the existing settlement pattern and supports the provision of rural housing, to contribute to the provision of affordable housing where there is demonstrable need. It also seeks to manage development around the edges of existing settlements to prevent them from merging and protect rural character and landscape and encourages the use of previously used land provided it does not have high ecological value. In terms of employment land it seeks to safeguard important existing sites and support the rural economy.
- 2.3 Under Policy 3 of the HDPF, Storrington and Sullington are collectively classified as a small town/larger village capable of sustaining some expansion within the settlement hierarchy (though the hamlet of Sullington is entirely within the National Park). The policy indicates that these settlements have a good range of service and facilities, local employment provision and access to public transport and act as hubs for smaller settlements. Development should be at an appropriate scale to the settlements.
- 2.4 As stated above part of the Plan area lies within the South Downs National Park. The National Park Authority is preparing its Local Plan. The South Downs Local Plan: Preferred

Options was approved in July 2015 and the consultation took place in September and October 2015. Consultation on the Pre-Submission Local Plan took place between September and November 2017. Until this Plan is adopted the saved policies of the Horsham Core Strategy (2007) cover the parts of the Neighbourhood Plan area within the South Downs. Again this does not suggest the number of houses that should be allocated in the Neighbourhood Plan area.

- 2.5 In the Core Strategy, Washington village has a defined built up area boundary and is designated as a category 2 settlement. These are villages with a limited level of services which should accommodate only small-scale development or minor extensions which address specific local needs. It has a few community facilities (a school, pub and village hall) and buses do service the village.

3. Housing need

- 3.1 The housing need for both Parishes is set out in The Storrington and Sullington and Washington Neighbourhood Plan – State of the Parishes Report (June 2014). These were drawn from the Housing Needs Survey for Storrington and Sullington (October 2012) which identified that 84 households were in need of affordable housing and 7 households as seeking open market housing. The Washington Housing Needs Survey (November 2013) identified that there were 13 households in housing need with a local connection and who could not afford to either purchase or rent in the open market.
- 3.2 It should also be noted that consultation with the community indicates support for new developments of 2 or 3 bed homes (70%), preferably through infilling or the use of brownfield sites (83%). These should be delivered via several small (up to 10 homes) developments (51%) or individual homes (47%).
- 3.3 Both Parishes have considerable environmental constraints. As stated previously most of Washington parish lies within the South Downs National Park. Circular 2010 (the English National Parks and the Broads) indicates that unrestricted housing provision in these areas is not appropriate given the purpose and duty of national parks. It states that; “The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services”.
- 3.4 The southern part of the Storrington and Sullington parish is within the National Park, which restricts development in this area of the parish. In places this abuts the built up area boundary. Beyond the Park boundary development must be restricted to locations which do not have an impact on views into and from the Park. Policy 30 of the Core Strategy indicates that development proposals in or close to protected landscapes should not have an adverse impact on the natural beauty or public enjoyment of the landscape. In addition, there are national ecological designations which limit the locations of development. Sites of Special Scientific Interest (SSSI) are located near the built up area of Storrington village with Sullington Warren and Chantry Mill to the east and south of the settlement. To the west of

Storrington village there is Parham Park which is an SSSI as well as a Historic Park and Garden.

- 3.5 In addition, the centre of the Storrington village and most of Washington village are covered by Conservation Areas and there are numerous listed buildings throughout both parishes. Parts of Storrington village are within flood zone 3 land associated with the River Stor.
- 3.6 Overall the housing needs of the parishes must be balanced with the strong environmental constraints that are present in the Neighbourhood Plan area.
- 3.7 In support of the Storrington and Sullington and Washington Neighbourhood Plan, Storrington and Sullington Parish Council and Washington Parish Council have undertaken a Housing Alignment Study. The Study, which utilises the housing needs study for both parishes together with the district council's own work on Objectively Assessed Housing Need (OAHN), has identified housing requirement for the area up to 2031. Consequently, the growth in dwellings for both parishes until 2031 would be approximately **894** dwellings, which would equate to **45 dwellings per annum (dpa)** between 2011 and 2031. The Storrington and Sullington and Washington Neighbourhood Plan anticipates that it will provide 194 dwellings in the form of housing allocation. This would be just under 13% of the district's total Neighbourhood Planning requirement. This is considered to be proportionate given the position within the settlement hierarchy, and the significant constraints in the locality including flood risk, heritage assets, and landscape impacts which arise from the parishes' falling within or adjoining the South Downs National Park.

4. Employment

- 4.1 The HDPF states that Neighbourhood Plans will play a central role in identifying and promoting sustainable economic growth at the local level. The Plan recognises that the rural parts of the district and the smaller villages and town make an important contribution to the economy of the district. Policy 10 deals with rural economic development and aims to ensure that local rural employment opportunities are encouraged. It contains a set of criteria to ensure that rural employment related development is appropriate for a country side location. Policy 9 deals with the redevelopment of employment sites and premises, both for defined Key Employment Areas and outside these areas.
- 4.2 The Neighbourhood Plan contains a spatial strategy to move employment uses that are no longer in appropriate locations within Storrington village to sites adjacent to the A24 where there are better transport links. One employment site is allocated within the Plan which is situated in Washington parish and within the South Downs National Park.

5. Previous Methodology

- 5.1 The sites to be assessed were identified by carrying out a Call for Sites and from sites in the Strategic Housing and Employment Land Availability Assessment (SHELAA) for the Horsham district and South Downs National Park. This was carried out in July/August 2014. Notices were displayed on all the Parish Council notice boards and websites and articles placed in

the County Times newspaper and in the Sussex Local magazine which is delivered to all homes in Storrington & Sullington, all inviting suggestions of land for potential development. Letters were also sent to local estate agents and landowners.

- 5.2 A total of 41 sites were submitted for consideration for housing and employment. Twenty of these had been submitted to the District Council for its Strategic Housing and Employment Land Availability Assessment. Of the 41 sites that were submitted 7 were small sites which could accommodate less than 6 houses. As such the Steering Group considered that these would be windfall sites or infill as described in Policy 1 of the Neighbourhood Plan. These sites are listed in Appendix 3. One of these sites (Land off of Kithurst Lane) is now included in the main assessment as the landowner increased the number of units to be delivered on the site.
- 5.3 It should be noted that since the original call for sites two landowners have put forward amendments to the original schemes. These are at the sandpit off Water Lane and Ravenscroft allotments. During the Regulation 14 consultation three additional sites were put forward as potential allocations. These are: Land at Kithurst Lane and Land off of Fryern Road for residential and Chantry Quarry for potential commercial use. The latter is linked to the proposed residential development of an industrial estate off Chantry Lane. These three sites have been assessed and are included as an addendum to Appendix 2. Where relevant the latter has also been amended where updated information has been provided.
- 5.3 The methodology used in the previous Site Assessment Report (June 2016) was based on a series of criteria and a numerical scoring. The criteria were derived from a combination of references in the National Planning Policy Framework, relevant policies in the HDPF and the views and opinions of the residents within the Neighbourhood Plan area. The original criteria are set out in Appendix 1 to this report.
- 5.4 The previous Site Assessment Report was considered by the Examiner in March 2016 as part of the evidence base for the Pre-Submission Draft of the Neighbourhood Plan. The Examiner raised concerns over the methodology that was used to assess sites for allocation. The Examiner stated that; *“there are no general criteria relating to sustainability”*. Due to this omission the Examiner considered that the Plan was not compatible with EU obligations in terms of the SA/SEA. The latter *“to a significant degree relies on the adequacy of that site assessment work It cannot be certain, therefore, that the SA/SEA is founded on a complete and accurate evidence base.”*
- 5.5 The current Site Assessment Report, therefore, seeks to address these concerns by using an updated methodology. The same sites have been assessed but as stated earlier in this report proposals for developing two of the sites have been amended since the previous site assessment and three additional sites have been included in the assessment.

6. Revised site assessment methodology

- 6.1 The updated assessment has been completed using a different methodology but one which draws on the original criteria. The number of issues included for the site assessment has been expanded to ensure that all aspects of sustainability are addressed and, where relevant, distances to facilities have been used to assist with the assessment.
- 6.2 The issues that have been used to assess the sites have been drawn up from the following three sources:-
- Those included in the original scoring criteria as these have been consulted upon and supported by the local community. In some instances these have been made more explicit. For example, village treasure has been explicitly included by including details of sites that are within or adjacent to Sites of Special Scientific Interest, Listed Buildings and Conservation Areas;
 - Those covered by the objectives and measures used in the Sustainability Framework included in the Environment Report have been incorporated. In addition some quantification, such as distances to facilities, has been used. Again it is important to include these issues as they have been subject to consultation and supported by the local community as part of the Sustainability Appraisal;
 - Locality guidance on “Site Assessments for Neighbourhood Plans: A toolkit for neighbourhood planners”. The template in this guidance has been used by the Storrington and Sullington and Washington Neighbourhood Plan Steering Group to provide a summary of key information on all the sites that were considered for inclusion in the Pre-Submission Plan. This provides a useful framework for presenting the information but is only a summary. More information is required to demonstrate that all sustainability issues have been addressed when assessing the sites. The Guidance suggests the use of a traffic light system of “Red Amber Green” for scoring sites. This has been used in the revised assessment. It is also important that the sites should be deliverable (suitable, available and achievable).
- 6.3 The detailed site assessment is presented in a matrix which forms Appendix 2. This includes a list of issues which each site is assessed against. Each issue has been given a Red, Amber or Green to illustrate the suitability of the site against the specific issue (see below). The latter provides a useful visual way of determining the overall suitability of the site and each issue also has a commentary to quantify the scoring. This form of methodology allows a justification for allocating sites to be clearly stated.

X	-	+	0
Negative effect	Neutral effect	Positive effect	Unknown or irrelevant

- 6.4 The red, amber or green score has been applied for the different site issues as set out below. Appendix 1 contains more information on how the scoring has been used to assess the sites. Overall the scores help to determine if a site is suitable and does not give a specific outcome; for example a certain number of reds do not mean that a site is not suitable for allocation.

- Built up area boundary; within is green, abutting is amber and red is in a rural location
- South Downs National Park; within is red, adjacent is amber and neither of these is blue for not relevant (views into and out of the park are also noted)
- Accommodate affordable housing and a range of types, sizes and tenures; cannot accommodate is red, some potential is amber, can accommodate is green
- Distances from public transport, employment, village centre, schools, open space/recreation and leisure/community facilities - red is more than 1km from the site (this is approximately a 15 minute walk), amber is 500m to 1km and green is less than 500m;
- for local greenspace, ecological, archaeological and heritage designations the scoring is red where such designations fall within the site, amber if they abut the site and blue where the designations are not relevant to the site;
- loss of community/recreation facilities or employment is red where these would be lost, amber where there is potential for these to be lost or blue where this issue is not relevant to the site;
- opportunities to provide additional open space, recreation or community facilities, additional employment, landscaping and enhance biodiversity or heritage assets is green where the landowner has indicated that these will be provided, amber where there is potential or blue where this is not relevant;
- inter village gaps; red is within such gaps or blue where this is not relevant;
- access to highway and traffic generation; significant issues is red, where there could be issues but could be overcome is amber, access can be provided is green;
- access for pedestrians and bikes; where this is restricted or difficult to provide is red, can be provided but facilities not readily accessible is amber, access can be provided and is accessible is green;
- public rights of way; across the site is red, adjacent to the boundary is amber and not present is blue;
- flooding; where the site contains zone 3 is red, amber is where zone 3 is nearby or the site contains zone 2 and green is zone 1
- Agricultural land classification; grade 1 is red, grade 2/3 is amber
- Air Quality Management Area; within this area is red, amber is near the site or where the site could generate significant additional traffic and blue is where this is not a relevant issue;
- Contaminated land; red is where there is direct evidence that this is present, amber is where previous uses suggest this could be an issue and blue is where this is not a relevant issue.

6.5 Not all of the detail in each of these categories is given for all of the sites. Those that are not adjacent to the built up area boundary and are within the National Park were considered unlikely to be acceptable due to the constraints placed by higher level Plans. Details on views and topography were not included for sites in these locations.

6.6 Colour coding in the matrix for the SHELAA sites is slightly different and is shown below.

Not deliverable	Not deliverable but possibly through NP	1-5 years to deliver	6-10 years to deliver	11+ years to deliver

6.7 It should be noted that the latest SHELAA compiled by the South Downs National Park Authority (20th December 2016) did not include any sites within the Storrington/Sullington parish. One site was included within Washington village known as The Yard. It was excluded from the SHELAA as it does not have the capacity to deliver 6 or more dwellings.

6.8 Highway matters have been included in the detailed site assessment. West Sussex County Council Highways Department have provided informal comments on a number of sites and they have been considered as a part of the detailed site assessment process.

7. Assessment of individual sites

7.1 Appendix 2 contains the detailed assessment and a summary table for each of the sites considered for allocation in the Neighbourhood Plan. The summary table is based on the template recommended in the “My Community – A Toolkit for Neighbourhood Planners” document. Each table summarises the information in the site assessment matrix and contains a map to identify each site. Maps identifying the location of each allocated site can be found in appendix 4.

7.2 The summary tables demonstrate how the allocated sites are available, suitable and deliverable. Likewise, these also explain why, in the view of the Steering Group, sites are not suitable or deliverable. This suitability is a combination of how the sites comply with the planning policies in the HDPF, as this provides the strategic framework for the spatial strategy in the Neighbourhood Plan, combined with the assessment criteria set out in section 6 of this assessment report.

8. Outcome of public consultation

8.1 As there have been several consultations prior to reaching this stage of producing the Neighbourhood Plan the following is intended to give an overview of the outcome of each prior consultation. This gives an indication of the acceptability of proposed sites to the local community.

First Public Consultation – 3rd February 2015 – 17th March 2015

Total 185 responses

Bax Close	– 53 objections to the inclusion of this site - 2 comments of support
Chantry Industrial Estate	– 15 objections to the inclusion of this site

	4 comments of support
Ryecroft Lane	- 5 objections
Ravenscroft	- 6 objections

Second Public Consultation – 6th May 2015 – 16th June 2015

Total 389 responses (including the same letter sent in by 143 people)

Bax Close	- 238 objections (143 signed the same letter)
Chantry industrial Estate	- 8 objections
Ravenscroft	- 17 objections
Ryecroft Lane	- 2 objections
Old London Road	- 1 objection
Vineyards	- 1 objection

Third Public consultation - 6th July to 17th August 2016

Total 105 responses

Chantry Industrial Estate	- 34 objections
Ravenscroft	- 1 objection
Ryecroft Lane	- 2 objections
Old Mill Drive	- 2 objections

Consultation on the Pre-Submission Plan – 10th July to September 2017

Vineyards	- 1 objection
Ryecroft Lane	- 1 objection
Ravenscroft	- 11 objections
Angell Sandpit	- 32 objections

9. Summary of the sites to be allocated in the Plan

- 9.1 As a result of the revised site assessment process, the following sites have been allocated for housing and employment. Details to justify the inclusion in the pre-submission plan are included in Appendix 2 and a map showing the location of the allocated sites is included in Appendix 4.

Housing allocations for the Washington parish

- 9.2 ***Vineyards***, Old London Road, Washington – up to 15 dwellings on a site some distance from the built up area boundary currently occupied by one detached dwelling in a large plot in a small residential area. Although outside the Built-Up Area boundary of Washington the site does have access by foot to the facilities in the village (school, playing field and pub) as well as public transport. The proposed residential development would meet a local housing need and is in general conformity with Paragraph 55 of the HDPF. It can, therefore be justified

despite its location away from the settlement boundary. The level of housing proposed would be appropriate in this existing residential enclave.

Housing allocations for the Storrington/Sullington parish

- 9.3 **Land at Robell Way, Storrington (former Paula Rosa site)** – planning consent granted for a total of 98 dwellings within the built up area boundary and on a former key employment site (the decision notice was issued on 15th December 2016). Information was submitted to demonstrate that the site is no longer economically viable and that the sequential approach was applied in accordance with Policy 9 of the HDPF. The site is likely to provide 4x1 bed flats, 9x2 bed flats, 18x2 bed houses, 54x3 bed houses and 13x4 bed houses. A total of 34 units would be provided as affordable homes.
- 9.4 **Land at North Street (Old Ryecroft allotments), Storrington** – up to 10 dwellings on a vacant site previously used as an allotment. The site is close to the village centre and is in a sustainable location. Part of the site (50%) lies within flood zone 2 and 3. Following comments from the Environment Agency on this issue, a sequential and exception test has been carried for the proposed allocated sites in the Plan. The report concludes that the Parish needs to “balance the need to deliver housing against other constraints, including flooding. Given the lack of other available and suitable sites it is considered that this site will ensure that the district can meet its housing demand and help the local economy to grow. Based on this the proposed allocation passes the Sequential Test but the exception text has been applied”. A detailed flood risk assessment would be required prior to development of the site and flood mitigation measures should be incorporated into the design of the development.
- 9.5 **Ravenscroft Allotments** – some 35 dwellings situated on an edge of village site with good access to facilities that is currently used as an allotment. The existing allotments would be relocated directly to the south of the existing site and there would also be an element of housing along the eastern edge of this site. An extensive landscape buffer would be provided along the southern boundary to minimise any potential impact on the National Park. This is an amendment to the allocation included in the Pre-Submission Draft of the Neighbourhood Plan to overcome objections to the proposal from the South Downs National Park Authority. The size of the site and location of the replacement allotment has been altered to ensure that the development does not lie within the boundary of the National Park and that an adequate landscape buffer can be provided.
- 9.6 **Upper Old Mill Drive (reserve site)** – total of 20 (net) dwellings on a village centre site involving the redevelopment of some existing shop units and flats with good access to facilities and providing an opportunity to develop small sized units. This is a reserve site as the deliverability of the site within the plan period is uncertain.
- 9.7 **Land at the Post Office depot, High Street, Storrington** – up to 10 dwellings on a mix use site with retail and commercial uses. This site is in the centre of Storrington village and is therefore in a sustainable location and provides an opportunity to provide smaller units. The design of the proposal must be of a very high standard given the location of much of the site

within a Conservation Area. This is a reserve site as the deliverability of the site within the Plan period is uncertain.

- 9.8 **Former sandpit off Water Lane, Sullington** – total of 6 dwellings on a site currently adjacent to the built up area boundary with existing housing on all but one boundary. It was formerly submitted for inclusion in the Neighbourhood Plan for 20 dwellings but the current owner has reduced this to 6. Further information has been provided to indicate how the potential impact on the adjoining Site of Special Scientific Interest and Listed Building could be mitigated. Based on this information the relevant statutory consultees have not raised an objection to the allocation. As well as these considerations the design and layout of the site would also need to ensure that views from the National Park are not adversely impacted. Overall, the site can provide housing on a site that has access to most of the facilities and services in Storrington as well as public transport.

Employment allocation in the Washington parish

- 9.9 **North Farm, Wiston Estate** – this site is in a rural location within the South Downs National Park. The owners, Wiston Estates, wish to expand the current business uses on the site. However, given the location of the site within the National Park any extensions or new businesses will need to be strictly controlled. A Whole Estate Plan has been developed by the owners and adopted by the South Downs National Park authority. This allocation provides an opportunity for rural employment for appropriate business in this sensitive location.

10. Conclusion

- 10.1 The site assessment process has resulted in the allocation of one site in the Washington parish at the Vineyards for 15 houses which will make a contribution to the housing needs of the Washington parish. In addition, the Plan allocates North Farm for employment land with the accompanying policy ensuring that any uses at this site are appropriate for its location in the South Downs National Park whilst allowing the site to provide relevant employment opportunities.
- 10.2 For Storrington and Sullington parish the Plan allocates 179 dwellings on six sites; including one site that has permission for 98 dwellings on a former employment site which has yet to be constructed. This will not only contribute to the housing needs of both the parishes but also to the 1,500 houses that the HDPF suggests should come forward from Neighbourhood Plans across the district.