

Sustainability Appraisal

(incorporating a Strategic Environmental Assessment)

Storrington, Sullington & Washington

Neighbourhood Plan: Submission Draft

2018-2031

February 2018

CONTENTS

	Page
Non-Technical Summary	4
1. Introduction	8
2. Background	
a. Strategic Environmental Assessment/Sustainability Appraisal	9
b. The Scoping Report	9
3. Key Sustainability Issues for the Plan Area	11
4. Main Policies and Plans Relevant to the area	16
5. The Storrington, Sullington and Washington Neighbourhood Plan	21
6. The Sustainability Appraisal Framework	24
7. Outcome of the Appraisal	
a. Comparison of objectives in the Plan and the SA Framework	27
b. Appraisal of strategic policy & allocation of land	28
c. Appraisal of the policies	33
8. Assessment of alternatives & identification of cumulative effects	
a. Alternative options – spatial strategy	43
b. Alternative policy approach	44
c. Alternative sites	45
d. Cumulative effects	48
9. Mitigation and Monitoring	49
10. Summary and Next steps	50

List of Appendices

1. Vision from the English National Parks and the Broads Circular 2010
2. Key policies from the Horsham Core Strategy 2007
3. Vision and outcomes from the Partnership Management Plan: Shaping the Future of your South Downs National Park 2014-2019 (South Downs National Park)
4. Appraisal of the Site Allocations
5. Appraisal of main sites rejected for allocation in the Plan (reasonable alternatives)
6. Comments received during the Pre-Submission consultation

List of tables

1. Requirements of the EU Directive and the content of the Sustainability Appraisal
2. SWOT analysis for Storrington and Sullington parish
3. SWOT analysis for Washington parish
4. Sustainability Appraisal Framework
5. Sites rejected for inclusion in the SSWNP (reasonable alternatives)
Addendum – sites submitted during the Pre-Submission consultation

List of Figures

1. Scoring methodology in original Sustainability Appraisal
2. Scoring methodology for the current Sustainability Appraisal
3. Compatibility matrix

List of Plans

- a. The designated Storrington, Sullington & Washington Neighbourhood Area

NON TECHNICAL SUMMARY FOR THE SUSTAINABILITY APPRAISAL

1. Introduction

- 1.1 The purpose of this Sustainability Appraisal (which includes a Strategic Environmental Assessment) is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Pre-Submission version of the Neighbourhood Development Plan for Storrington & Sullington and Washington Parishes. It forms an important part of the evidence base for producing the Neighbourhood Plan. The Sustainability Appraisal (SA) has been updated following representations made at the Pre-Submission stage.
- 1.2 The report provides an assessment of the Neighbourhood Plan objectives and policies as well as the sites that are allocated for development. The appraisal needs to be completed because the plan allocates land for development.
- 1.3 The full social, economic and environmental baseline data which has been used as a basis for appraising the plan are contained in the Neighbourhood Plan State of the Parish report, which is available in the evidence base on the Storrington Parish Council website (www.storrington-pc.gov.uk). This information was also included in the Scoping Report together with relevant plans and programmes. The current Sustainability Appraisal (SA) revises and updates this information where appropriate. This is to ensure that the SA meets the requirements of the European Directive on Strategic Environmental Assessments but also updates it where new information is available.
- 1.4 The information in the SA is closely related to the Site Assessment Report. The Examiners Report (dated 24th March 2016) concluded that the plan could not go to Referendum, which is the next stage of the process of producing a Neighbourhood Plan. One of the reasons for this was that the site assessment process did not include a full range of environmental, social and economic issues and used numerical scores. As a result of this the approach used to assess the potential sites in the plan has been changed and is now more closely related to the SA and includes more environmental issues.
- 1.5 The Neighbourhood Plan contains a number of policies for the use and development of land in the area in the plan period from 2018 to 2031. These policies, together with the policies of the development plan, that is the Horsham District Planning Framework (HDPF) and Horsham Core Strategy 2007 - to be replaced in due course by the South Downs National Park Local Plan for that part of the area - and the National Planning Policy Framework (NPPF), will be used by Horsham District Council in determining planning applications once the Neighbourhood Plan is approved.
- 1.6 The baseline information for the area illustrates that the parishes covered by the plan have significant environmental constraints particularly the presence of the South Downs National Park. This lies to the south of Storrington, includes the whole of Sullington and Washington village. There are also ecological assets close to the built up area boundary of Storrington, flood zone 3 runs through this village centre and there is an Air Quality Management Area. However, a Housing Needs Survey and a Housing Alignment Study demonstrated the need for housing in both parishes. There is a specific need for affordable housing and smaller properties for families and also for older people wishing to downsize. Both parishes wish to retain and provide opportunities for new businesses to support the local economy, including retail and tourism.

2. The appraisal process and its outcomes

- 2.1 Using the baseline information a set of environmental, social and economic objectives was developed. These formed the basis for appraising several aspects of the plan. The appraisal process seeks to identify any potential positive and negative effects as well as where these could be neutral. The methodology was updated from the approach used in the previous SA (dated June 2016) which was too narrow and did not allow mitigation measures to be easily identified.
- 2.2 The SA starts by identifying any conflicts between the objectives of the Neighbourhood Plan and those used for the appraisal. This concluded that most are compatible. However, there are some areas where this is not the case. One such objective is economic development. This is because it aims to relocate businesses adjacent to the A24 which is a less accessible location. Encouraging these businesses to formulate and implement Travel Plans could help to mitigate this effect. The other potentially incompatible objective is traffic. This promotes changes to the A27 to reduce traffic congestion in the plan area, and specifically the centre of Storrington. This could have a negative effect on landscape, biodiversity and heritage outside the plan area. This would be dealt with in other plans.
- 2.3 Concentrating housing predominantly within the built up area boundary of the main villages could negatively affect heritage and flooding due to Conservation Areas in both main villages and areas at high risk of flooding in Storrington. This potentially negative effect is also identified elsewhere in the appraisal.
- 2.4 The spatial approach to the plan in policy 1 was appraised and is likely to have a positive effect. Only heritage and flooding could potentially be negatively affected by the spatial strategy in the plan. There are recommendations throughout the SA to reduce these potential effects.
- 2.5 A detailed appraisal of each of the policies in the plan under each of the environmental, social and economic objective identified some negative effects and changes to the plan to mitigate these were suggested. Most of the policies would generally make a positive or neutral contribution to the sustainability of the plan area. The appraisal indicated where the plan could be strengthened.
- 2.6 Each of the site specific policies for the allocated for housing and one for commercial use were also appraised using against the SA objectives. A number of mitigation measures for each of the sites were identified during the appraisal process to ensure that potential negative effects are reduced.
- 2.7 An important part of an SA is considering alternative options for the plan; including the spatial approach, different sites and what the environment, society and economy of the area would be like if the Neighbourhood Plan is not made.
- 2.8 The appraisal concluded that the spatial strategy for the plan would have the least negative impact compared to two other options. These were:-

Spatial Option A – to restrict development within the current built up area boundaries

Spatial Option B – to restrict development to within or adjacent to the current built up area boundaries.

- 2.9 The effect on the environment, society and economy without the plan would have numerous negative effects. The main positive effect would be to provide new housing but at a level that is appropriate to the many constraints of the plan area. Surveys by the Steering Group that produced the plan illustrated that the local community are concerned about this issue because of the scale of development that has taken place over the last 10 years. This has had an impact on the local environment and also local infrastructure.
- 2.10 There are two sites that were included in the previous Pre-Submission Draft of the Neighbourhood Plan that are not in the current plan. These were industrial land off of Chantry Lane, Storrington and Lucking's Yard, Old London Road, Washington. A new methodology for both the Site Assessment and the SA concluded that these are not sustainable locations and should not be included in the plan. These were appraised in the SA as they were considered to be reasonable alternatives. An update to the SA following the Pre-Submission consultation has increased the number of sites that have been appraised in the SA in terms of being reasonable alternatives (see paragraph 4.1 for an explanation of these sites). It has not, however, increased the number of allocated sites.
- 2.11 The final part of the appraisal was identifying the effects that all of the policies and sites in the plan could have when considered together. The positive combination of effects would relate to providing houses, employment and the communities of the area, such as facilities and access to green space. There could be negative effects on the poor air quality that already exists in Storrington from more development and relocating businesses to the A24. There could also be an impact on heritage and flooding by concentrating development within Storrington.

3. Mitigation measures and monitoring

- 3.1 Mitigation measures are included in detail for individual policies and the allocated sites. In general terms the plan is positive for social and economic issues and certain environmental issues such as biodiversity and landscape, for example, protecting designated Local Green Space and enhancing green infrastructure. However, there are areas where the plan is not as strong. Flooding is not addressed in the plan despite the presence of Flood Zone 2 and 3 in Storrington. Although national policy and higher level plans deal with this, the plan would be strengthened by some additional text on this local issue. This could refer to the presence of this flood zone and the need for mitigation measures such as incorporating sustainable urban drainage systems.
- 3.2 The potential for negative effects on heritage has been identified at a strategic level for both Storrington and Washington due to the presence of Conservation Areas in both of these villages. Again higher level plans do provide protection for such designations and so the effect is not likely to be significant. Nevertheless, the plan would be strengthened by including a reference to the presence of these Conservation Areas and the need to protect and enhance them.
- 3.3 The final potential negative effect relates to transport and the impact on poor air quality in Storrington. Although the plan encourages infrastructure provision for cycling and walking (as per Policy 18) this could also seek to provide cycle parking and electric vehicle charging points. The plan encourages employment to relocate adjacent to the A24 which is less accessible. This could have a negative effect by increase traffic to this location. The

suggested mitigation is to amend the plan to require businesses in this location to formulate and implement Travel Plans to reduce car use.

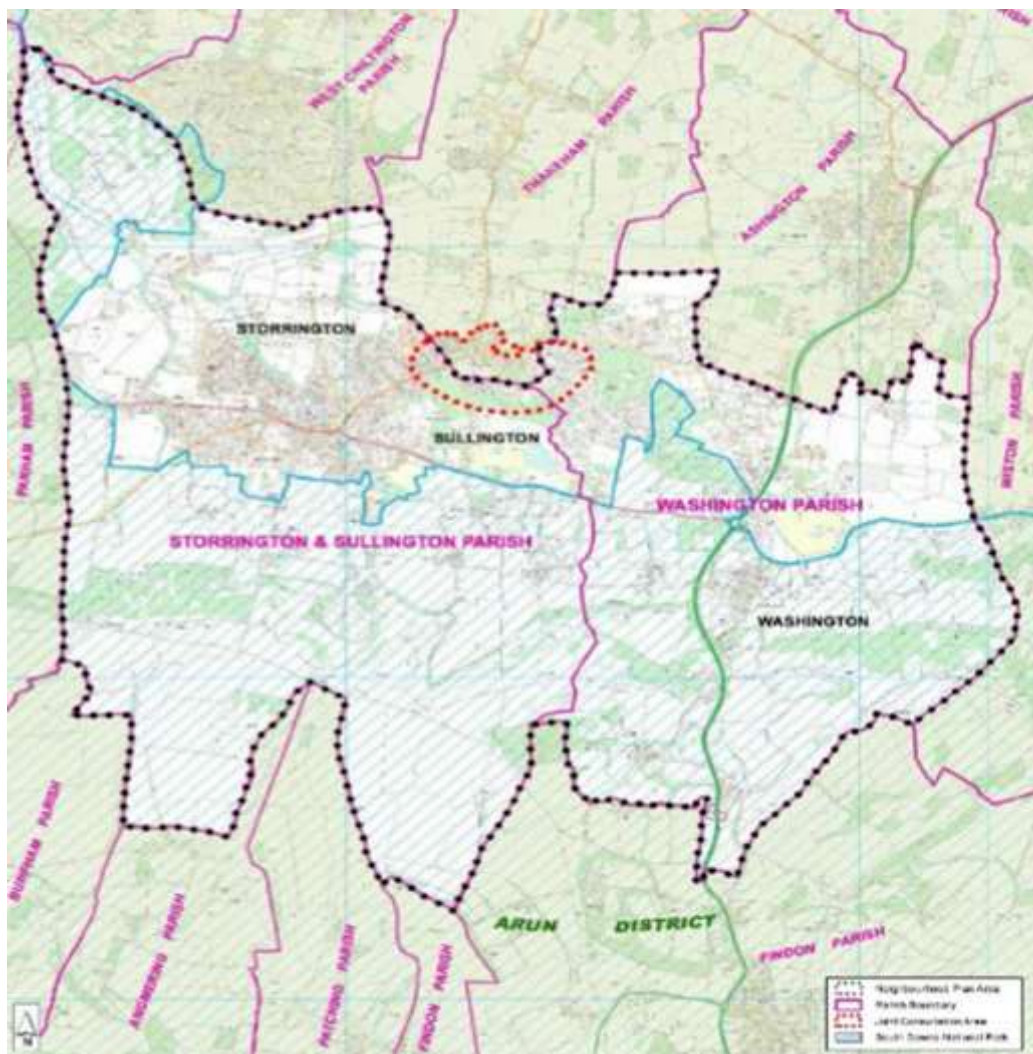
- 3.4 The sustainability effect of the Neighbourhood Plan should be monitored for both its positive and negative impacts. The most significant effects to be monitored will be in terms of the provision of smaller housing units, the number of affordable units constructed, impact on air quality and landscape and incidence of flooding.
- 3.5 This monitoring will take place using the measures identified in the SA. Some of the monitoring will be by Horsham District Council and the South Downs National Park Authority. This will be included in their Authority Monitoring Reports. In other cases, the Parish Councils will endeavour to collect data to report on the progress of the plan.

4. Progress and Next steps

- 4.1 The SA was published for consultation alongside the Pre-Submission Draft of the Neighbourhood Plan under Regulation 14 of the Neighbourhood Planning Regulations 2012 for a period of 6 weeks from 10th July to 4th September 2017. Comments were received on the SA during this consultation which resulted in some changes to the document. The main update was a full appraisal of all of the sites either within or adjacent to the current built-up area boundary. The previous SA identified these sites, and included a cross reference to the information in the Site Assessment Report which explained why they were not sustainable. However, one of the representations received questioned whether reasonable alternatives had been given sufficient consideration in the SA. Three additional sites submitted during the Regulation 14 consultation were also appraised. These were two additional housing sites adjacent to the built up area boundary and a proposed site for commercial use.
- 4.2 The updated site appraisals have not resulted in any additional sites being identified as sustainable. The Regulation 14 consultation resulted in modifications to the non-site specific policies in the plan. However, none of the changes required a reappraisal of these policies. The proposed changes to the plan suggested by the appraisal of the policies have now been incorporated into the Submission draft of the Neighbourhood Plan.
- 4.3 This final draft of the SA will now form part of the evidence base for the Submission Draft of the Neighbourhood Plan.

1. Introduction

- 1.1 This Sustainability Appraisal combines the requirements of a Strategic Environmental Assessment with the broader aspects of a Sustainability Appraisal. Its main purpose is to set out the results of the appraisal of the Pre-Submission Draft of the Storrington, Sullington and Washington Neighbourhood Plan ("the Neighbourhood Plan) for its effects on the key environmental as well as the social and economic aspects of the area. The plan covers two parishes; Storrington and Sullington and Washington; as shown in plan a. The Sustainability Appraisal was consulted upon at the same time as the Pre-Submission Draft of the Neighbourhood Plan. The SA has been updated following this consultation and now forms part of the evidence base for the Submission Draft of the Neighbourhood Plan.



Plan a: The Designated Storrington, Sullington & Washington Neighbourhood Area

- 1.2 The report starts by identifying the main social, economic and environmental issues that are relevant to both of the parishes as well as the plans and policies that shape development in these areas. A Sustainability Assessment Framework was developed based on this background information. This Framework has been used to carry out the appraisal of the Neighbourhood Plan.

- 1.3 The results of the appraisal of the objectives, policies and proposed site allocations are summarised in this Report. Other aspects that have been appraised are the alternative options that were considered when the plan was developed to ensure that the most sustainable options have been chosen. The overall effects of the plan (the cumulative effects) are identified along with potential changes to the plan which could reduce or offset negative effects (mitigation measures). Opportunities to enhance potential positive effects are also identified. Finally, a monitoring regime is set out to track the ongoing effects of the plan.
- 1.4 Overall the Sustainability Appraisal Report (incorporating the Environment Report) adheres to the requirements of the EU Directive 2001/42 on strategic environmental assessment.

2. Background

a) Sustainability Appraisal & Strategic Environmental Assessment

- 2.1 A Sustainability Appraisal (SA) is a structured way of assessing the social, environmental and economic effects of the Neighbourhood Plan. There is no legal requirement to carry out a Sustainability Appraisal of Neighbourhood Plans. However, one of the basic conditions for these plans is that they should contribute to sustainable development. Carrying out a Sustainability Appraisal is an effective way to demonstrate how the plan achieves this.
- 2.2 A Strategic Environmental Assessment (SEA) is not required for all Neighbourhood Plans. A screening opinion is the formal process for determining if an SEA needs to be incorporated into the development of the plan. This focuses on whether the plan may have significant environmental effects. As the lead authority, Horsham District Council determined that an SEA is required because the Neighbourhood Plan is intending to allocate land for development. This is a uniform approach that the Council is taking in relation to screening for SEA.
- 2.3 The Parish Councils have chosen to meet this obligation by preparing a Sustainability Appraisal (SA), incorporating a Strategic Environmental Assessment (SEA) under the SEA EU Directive. Table 1 table demonstrates how the requirements of the SEA Directive have been incorporated into this report on the Sustainability Appraisal.

b) The Scoping Report

- 2.4 This stage of the SA identifies the key environmental, social and economic issues in the area and suggests how the appraisal of the plan will take place. This information is included in a Scoping Report which is used to gain the views from certain statutory consultees to ensure that all relevant issues have been identified and that the method for completing the appraisal is acceptable.
- 2.5 Consultation on the Scoping Report took place in September - October 2014 in line with the Regulations. It can be viewed on the Parish Council website (www.storrington-pc.gov.uk). The full social, economic and environmental baseline data are contained in the Neighbourhood Plan State of the Parish report which was produced to cover both of the parishes (this can also be viewed on the Storrington Parish Council website). This sat alongside the Scoping Report and forms part of the evidence base. The comments received on the Scoping Report were generally supportive.

- 2.6 A review of the information contained in the Scoping Report, including the Sustainability Assessment Framework has been completed as part of revising and updating the Sustainability Appraisal. The information in the Scoping Report has also been updated and expended in the current Sustainability Appraisal as the Report was originally produced in 2014.

Requirement of the SEA Directive (Annex II)	Sustainability Appraisal
An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes	Chapter 4 and 5, Scoping Report and State of the Parishes Report
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Chapter 3 and 8, Scoping Report and State of the Parishes Report
The environmental characteristics of areas likely to be significantly affected	Chapter 7 and 8
Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance	Chapter 3, Scoping Report and State of the Parishes Report
The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation	Chapter 4, 7 and 8
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	Chapter 7 and 8
The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan	Chapter 9
An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Chapter 6, 7 and 8
A description of measures envisaged concerning monitoring	Chapter 9

Table 1 – requirements of the EU Directive and the content of the sustainability appraisal

3. Key sustainability issues for the plan area

- 3.1 In order to carry out the Sustainability Appraisal of the Storrington, Sullington and Washington Neighbourhood Plan (SSWNP) the key sustainability issues that are relevant to the area have been identified. Much of this is based on a State of the Parishes Report which was produced in June 2014. This collated relevant information on the area covered by the Neighbourhood Plan to provide the evidence base on which the SSWNP was based and to provide relevant information for the Sustainability Appraisal.
- 3.2 The State of the Parishes report can be found on the Storrington Parish Council website (www.storrington-pc.gov.uk). It contains relevant data on a wide number of issues¹.
- 3.3 In addition to this the EU Directive indicates which environmental issues should be addressed in an SEA. The Scoping Report does not provide up to date information on all of the issues required by the EU Directive. The information contained in this Sustainability Appraisal, therefore, updates the information in the State of the Parishes report and supplements this by including information on some issues that were not included in the original Scoping Report.

Storrington and Sullington parish – updated and headline information

- 3.4 The following is the headline information on the parish which gives an overview of the main issues that are relevant to the sustainability appraisal:-

Demographics

- There are less people under 15 and more people aged 65 and over than the rest of the district.

Economy and skills

- Storrington parish has low levels of unemployment compared to the rest of the district, higher levels of those who are retired and more people with no qualifications.

Housing

- Storrington parish has high levels of home ownership compared to the rest of the district and a slightly higher percentage of detached properties.

Transport

- Storrington parish has slightly lower levels of car ownership compared to the rest of the district;
- The village has a regular bus service and the nearest station is situated in Pulborough approximately 7km to the west of Storrington.

Health

- Storrington parish residents have slightly higher percentages for fair, bad and very bad health compared to the rest of the district.

¹ Reference to the district means the administrative boundary of Horsham District Council

Landscape

- The South Downs National Park lies directly to the south of Storrington and in some cases abuts the built up area boundary; making views from the Downs an important consideration when assessing sites for development in and around Storrington;
- Sullington lies within the national park;
- Useful information on the landscape of the plan area is contained in the State of the Parishes Report via relevant extracts from the Horsham Landscape Character Assessment (2014) and the Horsham Landscape Capacity Assessment (2013).

Biodiversity

- The area covered by the SSWNP is located within 15km of a nature site of European importance, the Arun Valley Special Area for Conservation/Special Protection Area/Ramsar site beyond Pulborough some 8km to the west. Natural England has confirmed that a Habitat Regulations Assessment is not required for the SSWNP;
- Storrington parish contains four Sites of Special Scientific Interest (SSSI); notably at Sullington Warren and at Chantry Mill which are close to the built up area boundary of Storrington and another site lies partly within the parish (Amberley Mount to Sullington);
- There are also Sites of Nature Conservation Importance (SNCI) in both parishes and areas containing Priority Habitats have been identified by Natural England. All of these and the SSSI's are described in Appendix 1 of the Scoping Report.

Heritage

- Storrington parish contains one Grade I listed building (Parham House) and one Grade II* building (West Wantley Farmhouse);
- There are a large number of Grade II listed buildings and structures (details are in the State of the Parishes report);
- There are sixteen scheduled monuments in Storrington & Sullington Parish;
- There are two Conservation Areas within the parish; one covers some of the centre of Storrington village;
- Parham Park is a designated park and garden lying to the west of Storrington village.

Flooding

- There is flood zone 2 and 3 present in Storrington village. This is the floodplain for the River Stour which flows through the area;
- Areas susceptible to groundwater flooding and surface water flooding are also identified via the Environment Agency.

Air

- Storrington village centre is covered by an Air Quality Management Area (AQMA) which was declared in December 2010;
- High levels of slow moving traffic produce the pollutants that have resulted in the declaration of the AQMA;
- Air Quality Action Plan has been drawn up and this is reviewed annually. The latest version is the Storrington AQMA scheme dated June 2016 which proposes local and district wide measures to reduce congestion and improve traffic flow through the village.

Soil

- There is no high grade (level 1 or 2) agricultural land in the Storrington and Sullington parish. However, there is some grade 3 land to the north and east of Storrington village.

Strengths, Weaknesses, Opportunities and Threats for Storrington and Sullington

- 3.5 In the context of the previous baseline information the following gives a summary of the key sustainability issues in the form of a Strength, Weaknesses, Opportunities and Strengths (SWOT) analysis for Storrington and Sullington parish.

<p>Strengths</p> <ul style="list-style-type: none"> • High quality landscape and stunning countryside either within or abutting the SDNP • Compact high street much of which is within a Conservation Area gives a strong village centre with a good range of shops and amenities • Commuting distance to larger center's giving access to employment and greater range of shops • Good range of community and leisure facilities which are accessible to those in the parish • Strong and diverse community with numerous community groups and regular community events 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Traffic volumes cause congestion and contribute to poor air quality with a designated AQMA in Storrington village • Limited public transport effects employment opportunities for non-drivers outside the parish • Increasing strain on local infrastructure • Poor broadband and mobile signal adversely affects businesses and residents • Narrow roads and footpaths reduce encouragement of walking and cycle access; cycle paths/ bridleways also require improvement • Some facilities are limited; no public toilets and over capacity at the current doctors surgery
<p>Opportunities</p> <ul style="list-style-type: none"> • Provision of appropriate housing to meet local needs including affordable and start up homes • Create a new centre, with medical facilities and public toilets • Protect key amenities and services and local green spaces • Maximise the location of the parish as "The Heart of the Downs" by providing tourism facilities and encouraging associated businesses and employment opportunities • Encourage a diverse range of new businesses including small retail units and commercial uses with access to main highway routes 	<p>Threats</p> <ul style="list-style-type: none"> • Continued growth in traffic through the village centre which could worsen the already poor air quality • High quality environment could constrain the opportunity to provide housing to meet local needs • Without affordable and mixed tenure housing the vitality of the parish could be reduced with a subsequent impact on retail uses and local facilities • Economic growth constrained by poor broadband and mobile communications • Increased density of development in the centre of Storrington village could lead to increased incidence of flooding • New development in neighbouring villages could result in settlements coalescing

Table 2 – SWOT analysis for Storrington and Sullington parish

Washington Parish – updated and headline information

3.6 The following is the headline information on the parish which gives an overview of the main issues that are relevant to the sustainability appraisal:-

Demographics

- Washington parish differs from the rest of the district in having more people aged 15 and under, fewer aged between 16 and 64 and more people aged 65 and over.

Employment and skills

- Washington has low levels of unemployment compared to the rest of the district and fewer residents with no qualifications. Roughly the same percentage of people are retired (just over 15%) and 66% of residents between 16 and 74 are economically active.

Housing

- Washington parish has very high levels of home ownership compared to the rest of the district and properties are predominantly detached.

Transport

- There are very high levels of car ownership compared to the rest of the district;
- The village is served by a reasonably regular bus services (along A24 and A283).

Health

- Residents reflect the health patterns of the rest of the district with approximately 50% in very good health and just over 30% in good health.

Landscape

- Much of Washington parish lies within the South Downs National Park, including the whole of Washington village;
- Useful information on the landscape of the plan area is contained in the State of the Parishes Report via relevant extracts from the Horsham Landscape Character Assessment (2014) and the Horsham Landscape Capacity Assessment (2013).

Biodiversity

- The area covered by the SSWNP is located within 15km of a nature site of European importance, the Arun Valley Special Area for Conservation/Special Protection Area/Ramsar site beyond Pulborough some 8km to the west. Natural England has confirmed that a Habitat Regulations Assessment is not required for the SSW Neighbourhood Plan;
- Washington parish has one SSSI at Chanctonbury Hill;
- There are numerous SNCI's as well as areas containing Priority Habitats identified by Natural England. These and the SSSI's are described in the Scoping Report in Appendix 1.

Heritage

- There is one Grade II* Listed Building (the Parish Church of St Mary);
- There are no scheduled monuments;
- A Conservation Area covers most of the Washington village.

Flooding

- Flood zone 2 and 3 is present to the north east of the village and north of the A283;

- There is some street flooding at the subway which allows access under the A24 to the north of the village.

Air and soil

- There are no issues relating to air quality in the parish;
- There is an area of grade 2 land (very good) in Washington parish. This is situated away from the village to the north of the A283 and either side of the A24.

Strengths, Weaknesses, Opportunities and Threats for Washington

3.7 In the context of the previous baseline information the following gives a summary of the key sustainability issues in the form of a Strength, Weaknesses, Opportunities and Threats (SWOT) analysis for Storrington and Sullington parish.

<p>Strengths</p> <ul style="list-style-type: none"> • Predominantly rural parish with a diversity of flora and fauna • High quality landscape which is predominantly within the national park • Village itself has a long history (dating from Saxon times) which is reflected in the range of attractive and diverse properties many of which have historical interest • Strong community spirit • In comparison to the size of the settlement Washington village has a good range of facilities 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Imbalance in the demography of the population with more older people • Lack of affordable housing particularly for younger families • Lack of youth facilities • Poor public transport with intermittent bus services • Over reliance on cars as cycle routes, bridleways and footpaths linking settlements needs to be improved • Areas of the parish away from the village do not have easy access to facilities and there are low levels of community engagement • Poor broadband and mobile signal adversely affects businesses and residents
<p>Opportunities</p> <ul style="list-style-type: none"> • Housing in appropriate location with a mixture of sensitively designed houses with an emphasis on affordable housing to meet local needs • Protect and enhance the local landscape, ecology, valued green spaces and heritage assets • Maximise the location of the parish as “The Heart of the Downs” encouraging tourism and associated employment opportunities • Improve cycle and pedestrian access in the parish for recreation and commuting • Allocation of sites for appropriate business uses to create local employment 	<p>Threats</p> <ul style="list-style-type: none"> • High quality environment could constrain the opportunity to provide housing to meet local needs • Without affordable housing and a mix in the size of housing young people/ families will not be able to move into the village affecting its vitality • A lack of alternative means of transport reduces employment options for those without a car • Parish is divided by trunk roads and high levels of speeding traffic in the surrounding lanes • Loss of settlement identity through ribbon development

Table 3 – SWOT analysis for Washington parish

4. Main Policies and Plans Relevant to the Area

- 4.1 As well as the key environmental, social and economic issues that affect the plan the baseline for the Sustainability Appraisal also requires an understanding of the policies and plans that influence the area and which the Neighbourhood Plan must operate within. It must have regard to the National Planning Policy Framework, contribute to the achievement of sustainable development and be in general conformity with strategic policies in the relevant Development Plan. This section of the Sustainability Appraisal highlights the relevant national policy and guidance that should influence the Neighbourhood Plan for Storrington, Sullington and Washington. It also identifies local planning documents that the Plan needs to conform with and that will also influence the Neighbourhood Plan area. For completeness this section has been expanded from the content of the Scoping Report.
- 4.2 The Neighbourhood Plan together with the relevant local plans for the area and the National Planning Policy will be used to determine planning applications once the Neighbourhood Plan is approved. The Horsham District Planning Framework is the relevant local plan for the area outside the national park. The current plan for land within the national park is currently the saved policies from the Horsham Core Strategy (2007) until a Local Plan is adopted for the South Downs National Park (potentially in 2018).
- 4.3 In addition to the following plans and policies information on other relevant plans and policies is contained in the State of the Parishes Report.

Environment Act 1995

- 4.4 This Act establishes the purpose and duties associated with areas designated as national parks. The purpose of the parks is to:-
- ***To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;***
 - ***To promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.***

In carrying out these purposes national park authorities have a duty to ***“seek to foster the economic and social well-being of the local communities within the National Park”***.

- 4.5 The Act also makes it clear that in national parks environmental protection takes precedent: ***“If it appears that there is a conflict between those purposes (the National Park Authority) shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area”***.

National Planning Policy Framework (DCLG 2012)

- 4.6 This sets out the Government’s policies relating to land use planning and how they should be applied. The focus of the Framework is the presumption in favour of sustainable development and this should influence the formation of all development plans as well as planning decisions. This principle, therefore, relates to Neighbourhood Plans.
- 4.7 The National Planning Policy Framework (NPPF) defines sustainable development in terms of the role that planning should play. These roles are:
- **an economic role** – contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right

places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

4.8 The NPPF states that the natural environment should be conserved and enhanced. It reflects the important status of national parks within the planning process and states that “*great weight should be given to conserving landscape and scenic beauty in National Parks*”.²

4.9 In addition to the NPPF there are also a set of National Planning Policy Guidance (NPPG) which provide advice on various issues relating to land use planning. NPPG indicates that on site provision of affordable housing cannot be sought on sites with 10 dwellings or under and can only require sites of 6-10 to provide financial contributions towards affordable housing in designated rural areas such as national parks. However, landowners can voluntarily provide affordable housing on smaller sites.

The English National Parks and the Broads Circular 2010

4.10 This sets out a vision for the English National Parks and the Broads for 2030 but also includes key outcomes that the Government wishes to achieve over the next 5 years. This vision is included in Appendix 1 of this report. One item of relevance to the SA is a focus on sustainable development and the pivotal role that communities in the national parks can play in transforming to a low carbon society and sustainable living.

4.11 The Circular gives a particular emphasis to meeting affordable housing needs within national parks and stresses that unrestricted housing provision is not appropriate in these areas 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*”.

The Horsham District Planning Framework (2015)

4.12 This is the development plan for the Horsham District and was adopted in November 2015; since the Scoping Report was published.

4.13 The Horsham District Planning Framework (HDPF) defines Storrington & Sullington as a larger village in the settlement hierarchy. This is, therefore, a settlement that has a role to play in supporting development. The HDPF (paragraph 3.24) acknowledges that development must be balanced with environmental constraints and not fundamentally alter local character. As such it also contains policies to protect the rural character of the district, prevent the coalescence of settlements and to protect the setting of the national

² National Planning Policy Framework (DCLG 2012) para 111.

park and the surrounding countryside more generally, as well as local heritage and biodiversity.

- 4.14 The plan acknowledges the important, complementary role of neighbourhood plans in forming the development plan for the district. It states that *“many local needs and objectives will be identified and met through neighbourhood plans and this will include the identification of locally specific issues and requirements and will include the allocation of sites”* (para 2.12, p.7).
- 4.15 The HDPF does not identify the number of houses that should be provided for each parish and therefore, Neighbourhood Plans in the district. Policy 15 indicates that at least 1,500 homes should be provided through allocations in Neighbourhood Plans throughout the district in accordance with the settlement hierarchy. The latter is established in Policy 3.
- 4.16 The HDPF identifies the following policies that set the policy framework for all the neighbourhood plans in the district:-
- Policy 2 Strategic Development – establishing the key principles for all development in the district, including how development around the edges of existing rural settlements should be managed;
 - Policy 3 Development Hierarchy – defining the position of all settlements in the district into a hierarchy based on their population and services; Storrington/Sullington is identified as a ‘Larger Village’ which has a good range of services and facilities, local employment and reasonable public transport;
 - Policy 4 Settlement Expansion – providing for the growth of settlements to meeting identified local housing, employment and community needs;
 - Policy 9 Employment Development – protecting existing employment sites and encouraging their appropriate expansion;
 - Policy 10 Rural Economic Development – encouraging development to promote local employment opportunities;
 - Policy 12 Vitality & Viability of Existing Retail Centres – defining Storrington as a ‘Secondary Centre’ in the district retail hierarchy;
 - Policy 13 Town Centre Uses - managing the mix of village centre uses;
 - Policy 15 Housing Provision – requiring neighbourhood plans to make provision in total for 1,500 new homes in the plan period, reflecting the position of settlements in the hierarchy of Policy;
 - Policy 24 Environmental Protection – minimising the impact of emissions of pollutants, including air pollution;
 - Policy 25 Natural Environment and District Character – protecting the landscape, landform and development pattern of the district
 - Policy 26 Countryside Protection – protecting the rural character of the countryside beyond defined settlement boundaries;
 - Policy 27 Settlement Coalescence – preventing development that will lead to the coalescence of settlements;
 - Policy 30 Protected Landscapes – identifying the setting of the South Downs National Park;
 - Policy 32 Quality of Development – ensuring development schemes understand and respond to their context;
 - Policy 34 Cultural & Heritage Assets – managing development affecting heritage assets like Conservation Areas and Listed Buildings;

- Policy 39 Infrastructure Provision – ensuring that development schemes can be accommodated by the local infrastructure and contribute to improvements where necessary to ensure the proper planning of the area.

Horsham Core Strategy (2007)

4.17 The Core Strategy sets out the key elements of the planning framework by defining the vision and objectives, together with the strategy and 'core policies' for the future. The document was formally adopted on 2 February 2007. The General Development Control policies document sets out the detailed policies against which individual planning applications will be assessed. The Strategy was formally adopted on 21 December 2007. The key policies in the Strategy are listed in Appendix 2.

4.18 This is the current development plan for the parts of Washington parish that fall within the South Downs National Park; which includes Washington village. In terms of the Core Strategy the village has a defined built up area boundary and is a Category 2 settlement which has limited services and can only accommodate small scale development or minor extensions that address local needs.

South Downs National Park Local Plan – Preferred Options (September 2015)

4.19 This development plan for the South Downs National Park is yet to be adopted. However, the Preferred Options indicates the direction of travel for planning policy in the parts of the Neighbourhood Plan area which fall within the national park.

4.20 The Plan is based on the statutory purposes for national parks specified in the Environment Act 1995 (see paragraphs 4.4 – 4.5). It contains a comprehensive list of planning policies for the national park which focus on *“living landscapes, people and places and ensuring a sustainable future within environmental limits”*. It will cover the period between 2014 and 2032. If adopted in 2018 it will shape growth in the area for 18 years and provide a strategic planning policy framework for all communities in the national park.

4.21 The plan contains six objectives that will meet the National Park Vision:-

1. To achieve a sustainable use of ecosystem products and services thus enhancing natural capital across the landscapes of the National Parks and contributing to human health, wealth and well-being;
2. To conserve and enhance the cultural heritage and large areas of high quality and well-managed habitat to form a network supporting wildlife through the landscape;
3. To provide and protect opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities;
4. To adapt to and mitigate the impacts of climate change and other pressures;
5. To maintain and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses;
6. To maintain and enhance farming, forestry, tourism and other business activities that are compatible with and relate to the landscape and special qualities of the National Park.

4.22 The strategic policies for the plan are defined via five main landscape character areas that make up the national park. The Neighbourhood Plan area adjacent to Storrington falls mostly within the Western Weald. This has a diverse range of landscape types with wooded hills, deep valleys and open heaths linked by sandy sunken lanes. Development proposals in this area must comply with Core Policy SD4/WW

- 4.23 Much of Washington Parish falls within the Scarp Slope area where the escarpment provides sweeping views across the Weald. Development in this area must comply with Core Policy SD4/SS. One of the challenges for this area is that views of the surrounding landscape from the scarp slope is why this area draws visitors but makes it vulnerable to development and the intrusion of urbanisation.
- 4.24 The overarching development strategy for both parishes is provided by policy SD22 which also lists which settlements have defined settlement boundaries. Washington has such a boundary. The policy states that development will not normally be permitted outside of the settlement boundaries and development in the open countryside will only be permitted in exceptional circumstances.
- 4.25 Strategic policy SD23 indicates the approximate level of housing that will be delivered for individual settlements. Washington is not identified in the plan for any allocated housing. Strategic Policy SD24 sets the parameters for the provision of affordable housing.

South Downs Local Plan – Pre-Submission (September 2017)

- 4.26 Consultation on the Pre-Submission Plan took place between September and November 2017. The intention is to submit the plan for examination in spring 2018. The Local Plan covers the time period 2014 to 2033. This part of the SA has, therefore, been updated from the version that accompanied the Pre-Submission Draft of the Neighbourhood Plan.
- 4.27 Changes have been made to the Local Plan following the consultation on the Preferred Options but none these alter the approach taken in the SA. The plan is still landscape led but the core policies are no longer based on the five broad landscape areas that are present in the South Downs National Park. However, these (along with the river corridors) form the spatial strategy for guiding development in the plan area with “medium level of growth dispersed across the towns and villages of the national park. Site allocations and policies are landscape capacity led, not target driven. Each of the broad landscape areas and river corridors are discussed in detail in the plan. The concept of Ecosystem Services also forms an integral part of the plan. The plan states that “this approach seeks to ensure the services that nature provides (such as wood fuel, clean water, health and well-being) from nature’s own “capital” (timber, water and fresh air) is factored into decision making and allocations”.
- 4.28 Chapter 6 allocates sites for development in line with the spatial strategy for the plan. No sites are allocated in the plan for the parts of Storrington and Sullington that lie within the national park or for Washington. However, the plan does define a settlement boundary for Washington village (as per policy SD25). The plan also identifies area around Storrington, Sullington and Washington that is within the mineral safeguarding area.

Partnership Management Plan: Shaping the Future of your South Downs National Park 2014-2019 (South Downs National Park)

- 4.29 This plan does not contain planning policies but does provide a framework for the emerging Park-wide Local Plan through shaping all other aspects of the future of the national park. It seeks to influence the charges that will occur in the national park to ensure that it is left in a better state for future generations. Some of these will be due to impacts from outside the Park’s boundary. It was produced in partnership with key stakeholders.
- 4.30 The plan contains a vision and 11 outcomes and policies that seek to implement these over a five year period on a range of key issues. It also contains a delivery framework and sets out how the plan will be monitored and reviewed. The vision is high level and sets out what the

SDNPA and its partners hope the South Downs national park will be like in 50 years' time. The 11 outcomes fall under three headings; a thriving living landscape, people connected with places and towards a sustainable future. These are listed in Appendix 3.

West Sussex Minerals Local Plan (2003)

- 4.31 The West Sussex Minerals Local Plan was adopted in 2003. Given the extent of current and past minerals workings in the parishes this has some bearing on how the SSWNP policies are framed and will be relevant in ensuring that potential sites avoid conflict with safeguarded minerals deposits and the reclamation of completed workings.

Relevant Neighbourhood Plans

- 4.32 The adjoining parishes at Thakeham, West Chiltington, Pulborough and Wiston are also preparing Neighbourhood Plans, either alone or in clusters. The most relevant of these is Thakeham, which contains a small part of the northern built up area of Storrington & Sullington. The plan passed the referendum in March 2017 and was made by Horsham District Council in April 2017. The plan contains a policy (Thakeham 2) to reuse the Thakeham Ties site for approximately 50 homes. This is an industrial site adjacent to Rock Road and within the built up area boundary of Storrington and Sullington. To accord with the policies in the HDPF this site will only come forward once an alternative location for the industrial use as been identified. The plan is not allocating any greenfield sites on the parish boundary.
- 4.33 Wiston parish joins the eastern boundary of Washington parish. A plan was being progressed for this parish as part of a cluster of four parishes. The amount of land that was being considered for allocation in Wiston was small (four housing sites and one for business use) and was unlikely to have a significant effect on Washington parish. However, the cluster has been disbanded and the future of a Neighbourhood Plan for Wiston parish is yet to be determined.
- 4.34 Pulborough parish lies to the west of Storrington and Sullington parish. A Pre-Submission Plan was produced in October 2015. However, further work is required to the evidence base and a new site assessment process is currently being undertaken. The previous plan allocated sites adjacent to Pulborough and to the north of the built up area boundary.
- 4.35 Finally, West Chiltington parish is in the early stages of production but given the rural nature of the parish and that West Chiltington village is a small settlement it is unlikely to allocate significant number of houses near the parish boundary.

5. The Storrington, Sullington and Washington Neighbourhood Plan

- 5.1 The Neighbourhood Plan covers two parishes; Storrington & Sullington and Washington Parish Councils. These are both rural and each has a main settlement; though in the case of Washington this is a much smaller village. The neighbourhood plan area is dominated by the South Downs National Park.
- 5.2 The process of producing a Neighbourhood Plan was agreed by both parish councils in 2013; the Steering Group was formed in September 2013. The group consists of representatives from both Parish Council's and the wider community. Focus Groups covering the following themes led the work in these areas:-
- Community facilities

- Economy and business
- Environment, heritage and local knowledge
- Planning and infrastructure
- Traffic and transport

This was accompanied by survey work and numerous consultation events. A Submission Plan was completed in July 2015 and then tested at Examination between January and March 2016.

- 5.3 An Examiners Report was issued on 24th March 2016. The Examiner was unable to recommend that the plan go forward to Referendum as it did not meet the standards required to meet the basic conditions. One of these conditions is that the making of the Neighbourhood Plan does not breach, and is, otherwise compatible with, European Union obligations.
- 5.4 The Examiner’s conclusion was based on the adequacy of the site assessment work which forms a part of the evidence base for the plan and has direct links to the SA. The site selection criteria used to assess the site was questioned by the Examiner, as it did not incorporate an adequate breadth of sustainability issues. Furthermore, there were concerns over the numerical scoring method that was used and the application of the scores. Overall this undermined confidence that the SA was based on robust evidence.
- 5.5 Following the Examination a further Pre-Submission consultation took place between 6th July 2016 and 17th August 2016. However, Horsham District Council expressed concern that the changes made to the Neighbourhood Plan and the supporting evidence base did not sufficiently address the issues that the Examiner identified for failing the plan. In light of these comments and to strengthen the SA the format for this report has been changed and a revised methodology has been used to carry out the appraisal. This also aligns closely to a new methodology for carrying out the site assessment process and identifying potential sites for allocation.

The Neighbourhood Plan vision and objectives

The Vision

By 2031 we will have shaped a community that has grown and developed to accommodate its needs in such a way that we have preserved its character and “essence”.

We will have protected our green spaces and our identities but at the same time provided for young families to remain and flourish here. We will have improved our infrastructure and our community facilities and enhanced telecommunications and broadband services to encourage more home working or small-scale industry.

We will have accommodated the growth needed without compromising the integrity of our villages.”

- 5.6 The Neighbourhood Plan translates this vision into a series of strategic objectives and identifies key measures for each objective. These are set out in the following paragraphs.

Housing

- To provide a mixture of housing types and in particular smaller private dwellings that is affordable for younger people
- To meet the need for affordable homes for those with an existing local connection
- To meet these needs mainly through smaller developments within the built up area
- To locate all new housing within or directly adjacent to the built up area

Employment / Economic Development

- To protect and enhance employment locally
- To provide properties suitable for home working and improve broadband and mobile phone services
- To consider the location of industrial areas close to the A24

SDNP and landscape

- To work with the SDNP to protect and enhance the national park
- To protect and enhance our footpaths, bridle paths and cycle paths
- To protect our green spaces
- To protect the character of our area by protecting trees, hedges, ponds, etc.

Village Centre

- To protect and enhance the vitality of the village centre
- To encourage new retail businesses to the village centre
- To create smaller premises for “start-up” businesses

Traffic

- To reduce congestion by supporting improvements to the A27
- To improve parking within the village centre
- To support measures to improve air quality

Community Facilities

- To protect assets such as schools, village halls, clubs and societies
- To support the development of a new medical / community centre
- To support measures to provide a skate park / leisure facilities

- 5.7 The Pre-Submission Draft of the Neighbourhood Plan contained the following policies:
- Policy 1: A Spatial Plan for the Parishes – establishing the focus for development locations in the area and defining built up area and settlement boundaries;
 - Policy 2: Site Allocations for Development – allocating sites for development for a mixture of residential and employment uses;

- Policy 3: Employment Uses – supporting economic development and allocating alternative employment land;
- Policy 4: North Farm, Wiston Estate, Washington;
- Policy 5: Storrington Village Centre Retail Area – restating the importance of the Village Centre as the local retail centre for the area;
- Policy 6: Development in Storrington Village Centre – supporting suitable non-retail development in the Centre;
- Policy 7: Washington Village Centre – supporting the provision of a new village shop
- Policy 8: Countryside Protection – protection of countryside views;
- Policy 9: Green Gaps – preventing coalescence between rural settlements
- Policy 10: Tourist Accommodation: supporting the provision of new tourism accommodation;
- Policy 11: Education Uses – supporting the development of new and / or extended school facilities;
- Policy 12: Recreation Facilities – supporting the creation of a new skate park;
- Policy 13: Allotments – allocating a new site for allotments and/or community gardens;
- Policy 14: Design – requiring development proposals to meet local design standards;
- Policy 15: Green Infrastructure & Biodiversity – promoting improvements to local green infrastructure assets and protecting biodiversity;
- Policy 16: Local Green Spaces – designating new spaces;
- Policy 17: Air Quality – restating the importance of reducing current air quality problems in the Village Centre;
- Policy 18: Traffic & Transport – supporting proposals that avoid making existing traffic congestion problems any worse;
- Policy 19: Car Parking – establishing local parking standards.

There are also two community aims which were policies in the previous iterations of the plan. These relate to tourism development at Sandgate Country Park and broadband and mobile communications

6. The Sustainability Appraisal Framework

- 6.1 The following Sustainability Framework has been developed to assess the social, economic and environmental effects of the plan. There have been some amendments to the Framework that was included in the Scoping Report (2014) to ensure that sustainability issues relevant to the plan area have been included. It was originally based on the SA objectives of the HDPF and this is still largely the case. The reason for this is that, where possible, relevant data sets can be shared for monitoring purposes.

Neighbourhood Plan SA Objectives	Neighbourhood Plan SA Measures
<p>Housing To provide high quality, affordable housing with a range of size, types and tenures appropriate to local needs</p>	<p>Will the plan improve the availability of decent, affordable housing? Will the plan provide a range of housing types of various sizes and tenures? Will the plan lead to the reuse of brownfield land for housing?</p>

<p>Community Facilities</p> <p>To ensure everyone has access to appropriate, affordable community facilities</p>	<p>Will the plan sustain or increase the provision of community facilities?</p>
<p>Biodiversity</p> <p>To protect and enhance the quality and level of biodiversity and natural habitats within the parishes and provide new green infrastructure</p>	<p>Will the plan lead to a loss to biodiversity, flora or fauna as a result of development either directly or through habitat fragmentation?</p> <p>Will the plan utilise opportunities to enhance the biodiversity of the parishes?</p>
<p>Landscape</p> <p>To conserve and enhance the quality of landscape and townscape character in the Plan area</p>	<p>Will the plan seek to protect and enhance the national park and its setting?</p> <p>Will the plan result in the deterioration of the quality of the landscape or villagescape?</p>
<p>Heritage</p> <p>To conserve and enhance the quality and distinctiveness of the historical environment of the parishes</p>	<p>Will the plan protect and enhance designated features of historical or cultural interest?</p> <p>Will the Plan sustain and enhance the settings and views of heritage assets?</p>
<p>Transport</p> <p>To reduce the need to travel & improve travel choices through the provision of a range of sustainable transport options, including walking, cycling & public transport</p>	<p>Will the plan reduce the need to travel by car by encouraging walking, cycling and the use of public transport to access facilities and employment?</p>
<p>Economic Development</p> <p>To encourage vitality, vibrancy and overall stability within the local economy, including in rural areas</p>	<p>Will the plan support existing shops and businesses?</p> <p>Will the Plan create employment opportunities?</p>
<p>Flooding</p> <p>To minimise flood risk and promote the use of sustainable drainage systems</p>	<p>Will the plan avoid allocating development on land subject to flood risk; either through surface water flooding or from the River Stor?</p> <p>Will the plan encourage developments to incorporate measures to reduce flood risk, such as sustainable urban drainage?</p>
<p>Environmental Quality</p> <p>To ensure that the air quality does not deteriorate further</p> <p>To ensure that best quality land is protected and contaminated land is remediated</p>	<p>Will the plan make the existing air quality problems in Storrington village centre worse due to increased traffic?</p> <p>Will the plan protect the best and most versatile land?</p> <p>Will the plan reduce the impact of contaminated land?</p>

Table 4: Sustainability Appraisal Framework

- 6.2 During the consultation on the SA Scoping Report, the National Park Authority commented that an additional measure for the objective on flooding should be included in the Framework. This suggested that measure should promote sustainable drainage for any proposed new development. This amendment has been made to the Framework. This is an update from the previous SA which rejected the need to include this amendment on the grounds that this issue is included in higher level plans. However, given the presence of Flood Zone 3 within the Storrington village it is considered important for this issue to be included in the appraisal of the Plan.

6.3 The Sustainability Framework is largely the same as the previous SA as these have already been subject to consultation. The original Framework was drawn from the SA objectives of the HDPF with modifications from the comments received at the scoping stage. The Framework has been revised from the original, in some places the wording has been strengthened and additional measures added. The latter has been informed by a comparison of the previous objectives and measures with the issues listed in Schedule 2 of the EU Directive.

7. Outcome of the Appraisal of the Objectives, Sites and Policies

Updated appraisal

7.1 The previous SA (dated June 2016) took a light touch approach to the appraisal of the policies in the accompanying Pre-Submission Draft of the Neighbourhood Plan (again dated June 2016). The categories used to appraise the policies were as follows:-

Positive impact
No impact or some impact but mitigated
Negative impact

Figure 1 – Scoring methodology for the previous SA

7.2 The main difficulty with this approach is that it made no distinction between a policy or site which did not have an impact and ones which could have a potential negative effect impact but could be mitigated. Identifying mitigation measures is one of the requirements of the Regulations³.

7.3 This revised SA uses the same broad methodology for appraising the policies but adds some extra categories to give an additional level of detail. The approach makes it clearer as to which policies may require amendments to reduce negative effects as well as assisting in drawing out the cumulative effects of the policies and sites. The categories used to appraise the policies are shown in figure 2.

Positive effect	Neutral	Negative Effect	Unknown	Not relevant
+	-	X	?	O

Figure 2 – scoring methodology for the current SA

7.4 The appraisal process is based on each of the issues in the Sustainability Framework. This indicates the potential effect of each policy on these issues and the associated measures. An assessment was undertaken on a draft version of the plan to identify where potential changes to the policies could strengthen the sustainability of the plan. These mitigation

³ Environmental Assessment of Plans and Programmes Regulations (2004) – Schedule 2

measures were subsequently incorporated into the Storrington, Sullington and Washington Pre-Submission Plan. The appraisal commences with an assessment of the objectives in the Neighbourhood Plan and then addresses the draft policies.

a/ Comparison of the SA objectives and the objectives of the Neighbourhood Plan

7.5 The Neighbourhood Plan contains a vision and a series of objectives under six broad headings. The following matrix tests the compatibility of the objectives in the plans with those in the SA Framework.

SA OBJECTIVES	Housing	Community Facilities	Biodiversity	Landscape	Heritage	Transport	Economic Development	Flooding	Environmental Quality
NEIGHBOURHOOD PLAN OBJECTIVES									
Housing	+	+	-	-	x	+	+	x	-
Economic Development	+	-	-	x	-	x	+	-	x
SDNP / Landscape	-	-	+	+	+	+	x	+	+
Village centre	+	+	-	-	-	+	+	-	-
Traffic	+	+	x	x	x	-	+	x	+
Community Facilities	+	+	-	-	-	+	+	-	-

Figure 4 – Compatibility matrix

7.6 Most of the objectives in the plan are either compatible or neutral in terms of those in the SA. The main areas where they are incompatible relate to housing, economic development and traffic. The housing objective is not compatible with the heritage and flooding objectives in the Framework as this generally concentrates development within the built up area which could impact on the Conservation Area in Storrington and Washington and could increase flood risk in Storrington.

7.7 The objectives relating to economic development in the plan seek to reuse and intensify business uses close to the A24. This could have a negative effect on the landscape in this area and would not promote sustainable forms of transport as it is away from both settlements in the plan area. It could, therefore, have a cumulative negative effect on the poor air quality in Storrington. Policies in the plan would need to mitigate these potential effects.

- 7.8 The traffic objective is not compatible with the SA objectives in several respects. It suggests that congestion in the plan area could be eased by improvements to the A27. As this major route goes through the national park this could have a negative effect on biodiversity, landscape and heritage. Furthermore, the plan seeks to improve parking within the village centre. Increased hard surfacing could increase flood risk without appropriate mitigation.
- 7.9 Policies in the plan should assist with reducing the potential negative effects of the objectives. For example, business uses located adjacent to the A24 should have travel plans to promote the use of sustainable forms of transport. Policies in the plan should ensure that development within the built up area boundary is not detrimental to heritage and, where relevant, incorporate measures to reduce flooding. The only point where this may not be possible is in terms of improvements to the A27 which are not within the area covered by the plan and would rely on higher level plans, both for delivering the objective and mitigating its impacts.

b/ Appraisal of the strategic policies & allocation of land

- 7.10 This section of the SA appraises the strategic approach taken in the plan and the allocated sites. Policy 1 provides the strategic approach to allocating land for development in the plan area. It principally focuses development within the built up area boundary of the main settlements in the plan with a particular focus on the reuse of previously used land. Infilling is permitted outside of this boundary for Washington village provided this accord with the requirements of the HDPF and South Downs Local Plan. The policy also seeks to prevent coalescence between settlements within the plan and with neighbouring parishes by defining broad green gaps.

Housing	Community facilities	Biodiversity	Landscape	Heritage	Transport	Economic development	Flooding	Environmental quality
+	+	+	+	X	-	+	X	-

Appraisal of Policy 1

- 7.11 The policy provides the overarching framework for allocating development and for the consideration of future development proposals. The policy is positive in terms of socio-economic issues as housing, employment land and community facilities which would largely be concentrated in the existing settlements of Storrington, Sullington and Washington. However, some development would be permitted beyond the settlement boundary of Washington adjacent to the Old London Road. This location is less sustainable as it is further from existing facilities and is adjacent to the boundary of the national park. Infill development could intensify housing development in this area.
- 7.12 The policy is largely positive in terms of the environmental objectives of the SA. By concentrating development largely within the defined settlement boundaries landscape and biodiversity would be broadly protected. The protection of gaps between settlements would contribute to this positive effect.
- 7.13 The overall effect on environmental quality is neutral. The policy is positive in favouring the use of previously developed land which would protect good quality agricultural land and

greenfield sites. In addition, concentrating development within settlements would allow the greater use of sustainable forms of transport which in turn would lessen the impact of car transport on the already poor air quality in Storrington. However, previously used land is more likely to be contaminated which would require remediation which is a negative effect. In addition, as noted above not all development is being directed to sites either within or directly adjacent to the built up area boundary which could result in an increase in car journeys. The latter is also the reason for the neutral score for the policy when assessed against the transport objective.

- 7.14 Flooding and heritage could be negatively affected by the policy. Concentrating development in settlements could have a detrimental effect on heritage assets as these are predominantly located within Storrington and Washington. Increased levels of development within built up areas can also increase surface water flooding and increase flood risk from the River Stor in Storrington.

Policy 2 – housing site allocations

- 7.15 This policy is divided into several sub-policies; one for each site that is allocated in the plan. The Pre-Submission draft of the plan allocated seven sites for housing and a total of 229 dwellings. This figure has been reduced due a representation from the South Downs National Park on the landscape impact of one of the sites at Pre-Submission. This has led to a reduction in the size of one of the sites as well as the number of dwellings within the allocated site. The total number of houses to be delivered by the plan is now 194. One of the sites (land at Robell Way) currently has planning consent for residential and is, therefore, included in the SA for completeness but any potential negative effects will have been addressed through the planning application process.
- 7.16 Overall 40 housing sites and one employment site were considered by the Steering Group and assessed in the Site Assessment Report (at the Pre-Submission stage). An additional two proposed housing sites and one for commercial use were submitted during the Pre-Submission consultation. These have now been included in both the Site Assessment Report and the SA. The Site Assessment Report explains in detail how each of the sites were reassessed using a new methodology from that used in the previous Report (June 2016). In summary, following comments included in the Examiners Report (dated March 2016) a revised scoring methodology was used to assess all of the sites that could accommodate more than 6 dwellings (those sites that were smaller than this were defined as windfall sites and therefore, were not considered for allocation in the plan).
- 7.17 Each of the allocated sites has been appraised using the Sustainability Assessment Framework. The outcome of this appraisal is included in Appendix 4. The following summarises the conclusions from the appraisal of each allocated site as well as any potential mitigation measures and positive aspects that could be strengthened. As set out in paragraph 7.4 these mitigation measures have now been included in the Pre-Submission Plan.
- 7.18 The site on Land at Robell Way, Storrington has planning consent for residential and, therefore, the mitigation measures required would have been included in the consent and associated section 106 agreement.

Policy 2 (i)	Outcome of appraisal	Mitigation measures Enhancements
Land at Robell Way, Storrington (former Paula Rosa site)	On balance this policy is positive in terms of the sustainability objectives in the SA framework. There are, however, some potential negative effects that would need to be mitigated; in relation to flooding and economic development. The most difficult aspect to mitigate is the loss of employment land within Storrington.	This site has planning consent and these aspects have formed part of the planning permission and section 106 agreement. This is a Key Employment site in the HDPF and the principle of the loss of this site has been accepted with the planning consent. The tests set out in policy 9 of the HDPF were met in order to comply with this policy.

7.19 The site at The Vineyards, Old London Road, Washington is not adjacent to the built up area of this settlement. In accordance with the HDPF housing would not normally be permitted in this rural location. However, policy 2 does support the provision of rural housing which contributes towards the provision of affordable housing. The Housing Needs Survey demonstrates the housing need in Washington parish. Few sites were submitted near or within the settlement and in addition, the village falls within the national park. This site is within an existing residential enclave and the facilities in Washington can be reached by pedestrians using a subway under the A24 which is approximately a 15 minute walk.

Policy 2 (ii)	Outcome of appraisal	Mitigation measures Enhancements
Vineyards, Old London Road, Washington	Overall this site has several negative aspects in terms of the SA framework. The site is in a rural location as it is some distance from the settlement boundary for Washington which has limited facilities. However, the site is an existing housing plot located in a small residential enclave. Washington village which has a village hall, school, pub and playing fields as well as a bus stop is within a 15 minute walk. This allocation would make a positive contribution to the housing needs of Washington which has very limited options for such sites given its location in the national park and with a significant amount of heritage assets.	Given the proximity to the South Downs National Park there is the potential for a negative effect but this could be mitigated by appropriate design, density and landscaping with the retention of any mature trees. This would also enhance the biodiversity of the site. Traffic impacts on the Old London Road would need to be addressed in more detail. This road can accommodate two-way traffic but on street parking narrows this access route and existing residential and employment already use this road.

7.20 The site off North Street, Storrington provides the opportunity for a small development within easy reach of the village centre. The main issue with this potential development is that part of the site lies within Flood Zone 2 and 3, therefore, is at high risk of flooding. A Sequential and Exception Test has now been completed for the allocated sites in the plan. With the exception of the Land off North Street (Old Ryecroft allotments) the SSWNP allocates land which is in Flood Zone 1. Most of the sites allocated in the plan are within flood zone 1. The former Ryecroft allotments site is the only site has been allocated as an exceptions site with measures to mitigate against flood risk.

Policy 2 (iii)	Outcome of appraisal	Mitigation measures Enhancements
Land off North Street (known as Ryecroft allotments), Storrington	Overall this site allocation would contribute positively to the objectives in the SA framework. The site could provide smaller dwellings in close proximity to the centre of Storrington which is, therefore, a sustainable location on a site which is currently vacant.	Part of site (50%) lies within an area at high risk of flooding (Flood Zone 2 and 3). A detailed Flood Risk Assessment should be completed prior to consent being granted. A further exceptions test should also be undertaken and this should be reflected in the policy wording. A Sustainable Urban Drainage scheme should be incorporated into the development to manage flood risk and ensure that off-site risks are not increased. The scheme should include a site specific flood risk assessment and manage rainfall run-off rates and run-off rates and volumes to existing pre-development rates mimicking the natural drainage regime of the site. It should also be designed to current best practice. The proposal could be enhanced by retaining some of the mature planting along the boundary. This would be positive in terms of landscape, townscape and biodiversity. The access via North Street car park would need to ensure that safe pedestrian access for is provided (this has been endorsed by comments from the Highway Authority).

7.21 The allocation, which includes the allotments off of Ravenscroft, was amended in the Pre-Submission Plan, to increase the size of the site with a subsequent increase in the number of dwellings that could be provided (up to 70 dwellings). The site is adjacent to the current built up area boundary. The replacement allotment site would have been sited further south; within the boundary of the national park. An objection from the South Downs National Park Authority during the Regulation 14 consultation has resulted in a reduction in the size of the site and the number of dwellings allocated on this site (some 35 units). The scheme has returned to the option of relocating the allotments to the south of the current site which is outside the boundary of the national park. Some dwellings could be located along the eastern boundary of the new allotment site. Access would be via Ravenscroft.

Policy 2 (iv)	Outcome of appraisal	Mitigation measures Enhancements
Land near allotments at Ravenscroft, Storrington	Overall this site allocation would contribute positively to the objectives in the SA as the site could provide a significant number of houses in a mixed type and tenure scheme. The site is within walking distance of local facilities and public transport.	The replacement allotments would be located near to the current facilities. This would be adjacent to the SDNP. A comprehensive landscaping strategy including a buffer planting scheme along the southern boundary of the site would be required to ensure an appropriate transition from the urban boundary and adjacent national park. This could also enhance local biodiversity. As the relocated allotments would be very close to the boundary of the national park structures in the allotment should be kept to a minimum.

7.22 The former sandpit off of Water Lane could deliver 6 houses on a site that is adjacent to the built up area boundary and has access to most of the services and facilities in Storrington as well as public transport. There are existing residential properties adjacent to all but the northern boundary. There are several constraints associated with this potential

development site; such as being adjacent to a Site of Special Scientific Interest and a Listed Building. However, the constraints associated with the site can be mitigated and the responses from the statutory consultees during the Regulation 14 consultation concur with this.

Policy 2 (v)	Outcome of appraisal	Mitigation measures Enhancements
Former sandpit off of Water Lane, Sullington	Overall this site allocation would have a positive effect on the objectives of the SA framework. This gives an opportunity to provide housing which has reasonable access to services and facilities in Storrington as well as public transport.	There is potential for a negative impact on a Site of Special Scientific Interest adjacent to the site. This could be mitigated by a buffer zone and appropriate planting. There is a Listed Building adjacent to the eastern boundary with views from the proposed site. Mitigation would be required to reduce this impact; such as a buffer zone and planting. Impact on views from the South Downs would also need to be mitigated as the boundary to the national park is only 100m from the site. This could be achieved through appropriate design and layout and planting within the site.

7.23 The site at Old Market Square is a reserve site as it is not certain that this will be developed within the life time of the plan. However, this allocation would provide an opportunity for a mixed use scheme and a mix of housing directly adjacent to the village centre.

Policy 2 (vi)	Outcome of appraisal	Mitigation measures Enhancements
Market Square, Storrington	this policy allocation would have a positive effect on the SA objectives. It could provide a mix of housing sizes and tenures in a location that is accessible to services and facilities.	There are no significant negative effects from this allocation. The main issues that would need to be addressed are retaining commercial uses within the development and ensuring a high standard of design.

7.24 The Post Office depot site is another reserve site in the plan as its deliverability is not certain over the next 13 years. The comments of Royal Mail have been noted. The need for the redevelopment of the site to fund a replacement facility in Storrington and has been included in the policy.

Policy 2 (vii)	Outcome of appraisal	Mitigation measures Enhancements
Post Office Sorting Office, Storrington	Overall this site allocation would have a positive effect on the objectives of the SA framework. This provides an opportunity to provide smaller residential units in Storrington village centre which is a sustainable location.	There is potential for a negative impact on the Conservation Area and Listed Buildings if the frontage of the site is part of the redevelopment. However, the site primarily relates to the Sorting Office which is at the rear of the main building.

Policy 4 – employment site allocation

7.25 The plan only allocates one site for employment. This is North Farm which is Washington parish and is also located in the national park away from any settlement. However, it currently has business uses on site and the landowner wishes to expand these uses as well as adding facilities for tourism uses. A specific policy for this site is now included in the plan and has been written in conjunction with the South Downs National Park Authority.

Policy 4	Outcome of appraisal	Mitigation measures Enhancements
North Farm, Wiston Estate, Washington	The site is located within the national park away from any settlement. It is a very sensitive location for the extension and intensification of employment and could result in loss of tranquility and damage to the rural character of this part of the national park. The site is already in commercial use and the proposal seeks to retain and enhance the uses on the site which would provide valuable appropriate employment in this rural but sensitive location.	The previous plan (dated June 2016) referred to business use at North Farm but did not include any detail. The current plan contains a detailed policy for this site and the types of business uses that would be acceptable in this sensitive location. The allocation of the site is based on a Wiston Whole Estate Plan that has been adopted by the National Park Authority. This is mentioned in the supporting text for the policy.

c) Appraisal of the policies

7.26 The following appraises the policies in the plan against each of the objectives in the SA Framework by theme rather than individual policies, with recommendations for changes that could enhance the policies or mitigate negative effects. There have been changes to the SSWNP as it has evolved. Two of the issues that it addresses (Sandgate Park and broadband and mobile communications) are now Community Aims and not policies. These are not appraised in the SA.

<p>Housing objective To provide high quality, affordable housing with a range of size, types and tenures appropriate to local needs</p>	<p>Will the plan improve the availability of decent, affordable housing? Will the plan provide a range of housing types of various sizes and tenures? Will the plan lead to the reuse of brownfield land for housing?</p>
--	---

Overview of the effects on the sustainability objective

7.27 Overall the policies will have a neutral effect on this objective. Additional houses in the plan area will support and sustain retail uses as well as community, leisure and medical facilities. However, they could also place additional demand on these facilities. With employment uses additional houses will sustain the local economy. This is neutral because the policy suggests locating some employment away from both Washington and Storrington which may not directly support the housing being provided in the main settlements.

- 7.28 Allocations for housing could increase demand for additional facilities, however, Policies 11 and 12 supports the establishment of new facilities. Likewise additional housing could increase demand for allotments or community gardens but policy 13 supports the creation of new facilities. Whilst policy 18 could restrict the provision of more homes as it ensures that traffic impacts must be avoided or mitigated it also encourages sustainable forms of transport which could support additional housing.
- 7.29 The positive policies directly support the objective. Policy 6 encourages housing within the village centre. Whilst the tourism accommodation policy ensures that neighbouring residential properties should not be detrimentally affected by such changes of use.
- 7.30 There are several negative effects on this objective. Additional housing could have an adverse impact on air quality due increased traffic. However, policy 18 would act to mitigate this through providing infrastructure for sustainable modes of transport. The same argument also applies to Policy 15 in that housing could impact on biodiversity but this policy seeks to mitigate the negative impacts. However, the use of brownfield sites for houses could in some instances impact on biodiversity where fauna and flora has established on such sites.
- 7.31 There are several policies that could restrict the provision of additional housing; these are policies on countryside protection, green gaps, local greenspace and design. In terms of car parking additional housing would create additional demand for parking in the village centres. Policy 19 seeks to ensure that the current levels of parking are not reduced.
- 7.32 **Suggested changes to mitigate or strengthen policies** - None are suggested.

Policy 3 Employment Uses	Policy 5 Storrington Retail Areas	Policy 6 Storrington Village Centre	Policy 7 Washington Retail Uses	Policy 8 Countryside protection	Policy 9 Green gaps	Policy 10 Tourist Accommodation	Policy 11 Education Uses
-	-	+	-	x	x	+	--

Policy 12 Recreation Facilities	Policy 13 Allotments	Policy 14 Design	Policy 15 Green Infrastructure & Biodiversity	Policy 16 Local Green Spaces	Policy 17 Air Quality	Policy 18 Traffic & transport	Policy 19 Car Parking
-	-	x	x	x	x	-	x

Biodiversity Objective To protect and enhance the quality and level of biodiversity and natural habitats within the parishes and provide new green infrastructure	Will the plan lead to a loss to biodiversity, flora or fauna as a result of development either directly or through habitat fragmentation? Will the plan utilise opportunities to enhance the biodiversity of the parishes?
---	---

Overview of the effects on the sustainability objective

- 7.33 The potential effect on biodiversity from Policy 3 is negative as the policy seeks to expand or intensify existing uses within the national park and the A24 corridor which is removed from the built up area boundary. This is mitigated to some extent by a focus on previously developed land and the need for additional landscaping which could have biodiversity value. However, locating such development away from the settlements in the plan has the potential to impact on biodiversity. The negative effect of the policy could be mitigated by stating that wildlife effects should be minimised and not just landscape impacts. Indeed, the purpose of national parks does not just relate to landscape, these areas should also conserve and enhance wildlife. This also applies to policy 10 on tourist accommodation which in certain circumstances permits such uses outside the built up area boundary.
- 7.34 Several of the policies are likely to have a neutral effect on biodiversity. This is primarily due to the location of these facilities in the centre of Washington, Storrington and Sullington where biodiversity assets are minimal. Poor air quality can impact on biodiversity, likewise, trees can assist in reduce air pollutants. Hence, Policy 17 on air quality is appraised as being neutral. Policy 15 or 17 could be enhanced by making the link between the positive effects of planting trees and reducing the impact of air pollutants.
- 7.35 There are several policies that could have positive effects on biodiversity; namely policies 9, 13, 15 and 16. These all relate to enhancing or protecting green spaces in the plan area and in the case of policy 15 directly relates to biodiversity.
- 7.36 **Suggested changes to mitigate or strengthen policies**
- Policy 3 and 10; mitigate potential negative effects on biodiversity by ensuring that wildlife effects are taken into account for new employment uses and tourist accommodation outside the built up area boundary, particularly where these are within the national park. This could be via a new criteria or additions to the supporting text.

Policy 3 Employment Uses	Policy 5 Storrington Retail Areas	Policy 6 Storrington Village Centre	Policy 7 Washington Retail Uses	Policy 8 Countryside Protection	Policy 9 Green gaps	Policy 10 Tourist Accommodation	Policy 11 Education Uses
X	-	-	-	-	+	X	o

Policy 12 Recreation Facilities	Policy 13 Allotments	Policy 14 Design	Policy 15 Green Infrastructure & Biodiversity	Policy 16 Local Green Spaces	Policy 17 Air Quality	Policy 18 Traffic & transport	Policy 19 Car Parking
-	+	o	+	+	-	o	o

Community facilities objective To ensure everyone has access to appropriate, affordable community facilities	Will the plan sustain or increase the provision of community facilities?
--	--

Overview of the effects on the sustainability objective

- 7.37 In the vast majority of cases the policies are likely to have a positive effect on this sustainability objective. The plan could make a strong contribution to sustaining or increasing the provision of community facilities. This is particularly true if this is taken in its broadest sense to include educational and recreation facilities as the plan supports the extension of these within Storrington (policies 11 and 12). There is also a policy that supports the provision of new allotments (policy 13). Green spaces and green gaps could provide informal recreation (policies 9 and 16) whilst maintaining and enhancing green infrastructure (policy 15) would also contribute to the well-being of the local community. Policies 18 (traffic and transport) and 19 (car parking) are indirectly positive in providing access to facilities and in the case of the former this would be preferably by sustainable forms of transport.
- 7.38 The policies relating to the retail areas of Storrington and Washington support the retention and provision of retail uses which contribute to the vibrancy of the community by providing local shops.
- 7.39 None of the policies would have a negative effect on this sustainability objective.
- 7.40 **Suggested changes to mitigate or strengthen policies** - none suggested.

Policy 3 Employment Uses	Policy 5 Storrington Retail Areas	Policy 6 Storrington Village Centre	Policy 7 Washington Retail Uses	Policy 8 Countryside protection	Policy 9 Green gaps	Policy 10 Tourist Accommodation	Policy 11 Education Uses
-	+	+	+	-	+	-	+

Policy 12 Recreation Facilities	Policy 13 Allotments	Policy 14 Design	Policy 15 Green Infrastructure & Biodiversity	Policy 16 Local Green Spaces	Policy 17 Air Quality	Policy 18 Traffic & transport	Policy 19 Car Parking
+	+	0	+	+	-	+	+

Landscape To conserve and enhance the quality of landscape and townscape character of the plan area	Will the plan seek to protect and enhance the national park and its setting? Will the plan result in the deterioration of the quality of the landscape or townscape?
---	---

Overview of the effects on the sustainability objective

- 7.41 Two policies could have negative effects on this objective (7 and 19). Policy 7 is negative against this objective because it only refers to landscape. This effect could be mitigated by seeking to reduce the impact on the built environment of Washington. Whilst policy 19 could have a negative effect on the built environment if new car parking is not well located.
- 7.42 Policy 3 (employment uses) suggests locating some of this type of development in the A24 corridor which could have a negative effect on landscape. However, this policy contains landscape related criteria making this policy neutral. In the previous iteration of the Pre-Submission Plan this policy also referred to North Farm which is in the national park. A separate policy has now been included in the plan for North Farm (policy 4) which would mitigate the potential negative effects of business use in the sensitive location. The policy and/or the supporting text could be strengthened by seeking to reduce the potential townscape effects for new employment uses within the built up area boundary.
- 7.43 Seven policies are appraised as having a positive effect on this objective. Policy 6 specifically seeks to mitigate the impact of any proposals within the village centre for potential negative effects on townscape Whilst Policy 14 seeks to deliver high quality schemes that reflect the distinct character of the parishes. Policies 15 and 16 would ensure that the landscape of the parishes is enhanced.
- 7.44 The impact of policy 11 on education is not known as apart from the changes to the existing schools in Storrington no new sites have been identified.
- 7.45 **Suggested changes to mitigate or strengthen policies**
- Policy 7; mitigate negative effects on the built environment by the supporting text cross referring to policy 14 on design.

Policy 3 Employment Uses	Policy 5 Storrington Retail Areas	Policy 6 Storrington Village Centre	Policy 7 Washington Retail Uses	Policy 8 Countryside protection	Policy 9 Green gaps	Policy 10 Tourist Accommodation	Policy 11 Education Uses
-	-	+	+	+	+	-	?

Policy 12 Recreation Facilities	Policy 13 Allotments	Policy 14 Design	Policy 15 Green Infrastructure & Biodiversity	Policy 16 Local Green Spaces	Policy 17 Air Quality	Policy 18 Traffic & transport	Policy 19 Car Parking
-	-	+	+	+	-	-	X

Heritage objective To conserve & enhance the quality and distinctiveness of the historical environment of the parishes	Will the plan protect & enhance designated features of historic or cultural interest? Will the plan sustain & enhance the settings & views of heritage assets?
--	---

Overview of the effects on the sustainability objective

- 7.46 Four policies could have negative effects on this objective. As with the appraisal of the landscape objective policy 3 has the potential for negative effects on heritage as the policy focuses on the A24 corridor and North Farm and does not include any criteria for employment proposals that are located within the built up area boundary. This could be mitigated by cross referring to policy 14 (design)
- 7.47 Policy 7 (Washington village centre retail uses) does not make any reference to the need to protect the character of the Conservation Area. This would be mitigated by referring to the fact that any proposals must not cause significant harm to any heritage assets, including their settings and views. Two policies have the potential to have indirect negative effects through the inappropriate location of car parking; these are policies 13 and 19. Supporting text that addresses this issue could mitigate this effect.
- 7.48 Most of the policies are neutral in terms of this objective. Three are likely to have a positive effect. Policies 6 and 14 both make a direct reference to design. Whilst policy 16 on local green space could have an indirectly positive effect as such spaces can be an integral part of the setting and views of heritage assets.
- 7.49 The effects of the policy on education uses are difficult to predict as a site for a new schools is not identified in the plan.
- 7.50 **Suggested changes to mitigate or strengthen policies**
- Policies 3 and 7; mitigate any potential negative effects on heritage by adding a cross reference to policy 14 on design in the supporting text could or an additional criterion to policy 7.
 - Policy 7 (Washington village centre retail uses) or the supporting text; mitigate potential negative effects on heritage by referring to policy 14 for changes of use within the Conservation Area in Washington.
 - Policies 13 and 19; mitigate by changing the supporting text to suggest that the car parking is appropriately located to reduce any negative effects on heritage

Policy 3 Employment Uses	Policy 5 Storrington Retail Areas	Policy 6 Storrington Village Centre	Policy 7 Washington Retail Uses	Policy 8 Countryside protection	Policy 9 Green gaps	Policy 10 Tourist Accommodation	Policy 11 Education Uses
X	-	+	X	-	-	-	?
Policy 12 Recreation Facilities	Policy 13 Allotments	Policy 14 Design	Policy 15 Green Infrastructure & Biodiversity	Policy 16 Local Green Spaces	Policy 17 Air Quality	Policy 18 Traffic & transport	Policy 19 Car Parking
-	X	+	-	+	-	-	X

Transport objective To reduce the need to travel and improve travel choices through the provision of a range of sustainable transport options, including walking, cycling and public transport.	Will the plan reduce the need to travel by car by encouraging walking, cycling and the use of public transport to access facilities and employment?
---	---

Overview of the effects on the sustainability objective

- 7.51 Many of the policies in the plan are likely to have a positive effect on this objective as they seek to retain existing retail, community and recreation uses within the settlement areas of the plan and would, therefore, be accessible by sustainable forms of transport.
- 7.52 Policy 17 relates to air quality and directly encourages walking, cycling and the use of public transport which makes a positive contribution to this objective as well as reducing pollutants which contribute to poor air quality in the centre of Storrington (policy 17). In addition, policy 18 (traffic and transport) encourages new cycle paths and footpaths. This could be strengthened by also requiring cycle parking. In some instances local green space (policy 16) may encourage pedestrian access to facilities but this is not the main purpose of the designation.
- 7.53 Five policies may result in negative effects relating to this objective. Policy 3 (employment uses) suggests that employment uses away from the built up area boundary may be acceptable. Such locations are not readily accessible using sustainable forms of transport. Whilst policies 10, 13 and 19 all refer to the provision of car parking which again is not associated with sustainable forms of transport. This could be mitigated by suggesting that electric charge points could be provided; particularly in relation to policy 19. Although this is not a sustainable form of transport this would provide infrastructure for low emission vehicles.
- 7.54 The effect of policy 11 is difficult to predict as the outcome of the consultation on the school provision in Storrington and Sullington is not yet known. However, the policy directs new educational facilities to within or adjoining the settlement boundary which would encourage the use of sustainable forms of transport.
- 7.55 **Suggested changes to mitigate or strengthen policies**
- Policy 18 (traffic and transport); strengthen by requiring cycle parking.
 - Policy 19 (car parking); mitigate by suggesting electric charge points could be provided.

Policy3 Employment Uses	Policy 5 Storrington Retail Areas	Policy 6 Storrington Village Centre	Policy 7 Washington Retail Uses	Policy 8 Countryside protection	Policy 9 Green gaps	Policy 10 Tourist Accommodation	Policy 11 Education Uses
x	+	+	+	-	-	x	+

Policy 12 Recreation Facilities	Policy 13 Allotments	Policy 14 Design	Policy 15 Green Infrastructure & Biodiversity	Policy 16 Local Green Spaces	Policy 17 Air Quality	Policy 18 Traffic & transport	Policy 19 Car Parking
+	x	-	-	+	+	+	x

Economic development objective	Will the plan support existing shops and businesses? Will the plan encourage new employment opportunities?
To encourage vitality, vibrancy and overall stability within the local economy, including in rural areas	

Overview of the effects on the sustainability objective

7.56 Several of the policies would have a positive effect on this objective as they either directly or indirectly support the local economy or seek to retain and expand such uses. Policy 19 (car parking) would support the local economy by ensuring that there is not a net loss of public car parking. Policy 3 could be strengthened by adding criteria for reducing the impact of new or expanded employment within Storrington and Washington. At present the policy mentions landscape schemes and retaining existing screening from trees and woodland for reducing impact on the street scene just for sites adjacent to the A24. These considerations also need to apply to new or expanded employment within Storrington and Washington. A separate policy on North Farm (policy 4) has overcome the concerns in the previous Pre-Submission Plan of promoting an employment use in the national park without the necessary constraints on development in this sensitive location.

7.57 Policies on countryside protection, green gaps, design, biodiversity and local greenspace have the potential to restrict development related to supporting the local economy. Whilst the policy on air quality could have the same effect as developments need to demonstrate that traffic impacts will not decrease air quality in Storrington. Likewise the policy on traffic and transport could restrict development as proposals need to ensure that there is not a negative impact on the local road network. All of these are difficult to mitigate as they seek to provide environmental protection.

7.58 Two of the policies would have a neutral effect on this objective as they support more community related developments e.g. allotments, recreation facilities. Although policy 6 focuses on housing in Storrington village centre it seeks to resist the loss of village centre related employment, such as retail and office uses.

7.59 Suggested changes to mitigate or strengthen policies

- Policy 3; strengthen by expanding the criteria in the policy or the supporting text to reduce the potential negative impact of new or expanded employment uses.

Policy 3 Employment Uses	Policy 5 Storrington Retail Areas	Policy 6 Storrington Village Centre	Policy 7 Washington Retail Uses	Policy 8 Countryside protection	Policy 9 Green gaps	Policy 10 Tourist Accommodation	Policy 11 Education Uses
+	+	+	+	x	x	+	?

Policy 12 Recreation Facilities	Policy 13 Allotments	Policy 14 Design	Policy 15 Green Infrastructure & Biodiversity	Policy 16 Local Green Spaces	Policy 17 Air Quality	Policy 18 Traffic & transport	Policy 19 Car Parking
-	-	x	x	x	x	x	+

Flooding objective	To minimise flood risk and promote the use of sustainable drainage systems
	<p>Will the plan avoid allocating development on land subject to flood risk; either through flooding from the River Stor or via surface water flooding?</p> <p>Will the plan encourage developments to incorporate measures to reduce flood risk, such as sustainable urban drainage?</p>

Overview of the effects on the sustainability objective

7.60 A few of the policies would make a positive contribution to this objective as they support green infrastructure which can help to reduce the likelihood and severity of flooding. Policy 15 (or the supporting text) could strengthen its contribution to this objective by recognising that green infrastructure can reduce flood risk.

7.61 Most of the policies are neutral in relation to this objective. However, the supporting text for policy 14 (design) could be strengthened by indicating that the design of new developments should incorporate sustainable drainage systems. Likewise policy 19 (car parking) or its supporting text could also be strengthened by encouraging new car parking areas to use permeable surfaces to reduce surface water run-off.

7.62 Suggested changes to mitigate or strengthen policies

- Policy 14 (design) or its supporting text; strengthen by including a reference to incorporating sustainable drainage systems, where appropriate;
- Policy 15 (green infrastructure and biodiversity); strengthen by adding some wording to the policy or the supporting text that recognises the positive contribution that green infrastructure plays in reducing flood risk;
- Policy 19 (car parking) or its supporting text; strengthen by encouraging new car parking areas to use permeable surfaces to reduce surface water run-off.

Policy 3 Employment Uses	Policy 5 Storrington Retail Areas	Policy 6 Storrington Village Centre	Policy 7 Washington Retail Uses	Policy 8 Countryside protection	Policy 9 Green gaps	Policy 10 Tourist Accommodation	Policy 11 Education Uses
-	-	-	-	-	-	-	o

Policy 12 Recreation Facilities	Policy 13 Allotments	Policy 14 Design	Policy 15 Green Infrastructure & Biodiversity	Policy 16 Local Green Spaces	Policy 17 Air Quality	Policy 18 Traffic & transport	Policy 19 Car Parking
-	+	-	+	+	o	o	-

<p>Environmental quality objective</p> <p>To ensure that the air quality does not deteriorate further</p> <p>To ensure that the best quality land is protected and contaminated land is remediated</p>	<p>Will the plan worsen the existing air quality problems worse in Storrington village centre as a result of additional traffic from its policies and allocated sites?</p> <p>Will the plan protect the best and most versatile land?</p> <p>Will the plan address issues of contaminated land where sites are allocated for development?</p>
---	---

Overview of the effects on the sustainability objective

7.63 The poor air quality in Storrington and the designation of the Air Quality Management Area is related to pollutants generated from traffic. Therefore, policies which seek to provide new facilities or retain existing ones within Storrington will make a positive contribution to this objective as these are more accessible by sustainable forms of transport which are less polluting (5, 6, 7, 11, and 12). The policies which retain green infrastructure (policies 15 and 16) would make a positive contribution to this objective by helping to reduce poor air quality. Policy 18 (traffic and transport) is positive because it encourages new cycle paths and footpaths but could be strengthened by increasing the provision of cycle parking. Policy 17 directly relates to addressing the poor air quality in Storrington.

7.64 Policy 3 is neutral as it encourages employment uses along the A24 corridor which is less accessible by sustainable forms of transport. However, it supports the use of previously developed land which retains good quality land in the parishes. This policy could be strengthened by changing the supporting text to ensure that remediation is required for any contaminated land.

7.65 Policies 10, 13 and 19 are negative because they encourage the provision of car parking. This could be mitigated by requiring the provision of electric charge points; particularly in the case of policy 19. Low emission vehicles would not contribute to the poor air quality in Storrington.

7.66 Suggested changes to mitigate or strengthen policies

- Policy 3 (employment uses); strengthen by amending the supporting text to ensure that contaminated land is remediated for development on previously used land;
- Policy 18 (traffic and transport); strengthen by also requiring cycle parking;
- Policy 19 (car parking), mitigate effects by requiring electric charge points.

Policy 3 Employment Uses	Policy 5 Storrington Retail Areas	Policy 6 Storrington Village Centre	Policy 7 Washington Retail Uses	Policy 8 Countryside protection	Policy 9 Green gaps	Policy 10 Tourist Accommodation	Policy 11 Education Uses
-	+	+	+	-	-	X	+

Policy 12 Recreation Facilities	Policy 13 Allotments	Policy 14 Design	Policy 15 Green Infrastructure & Biodiversity	Policy 16 Local Green Spaces	Policy 17 Air Quality	Policy 18 Traffic & transport	Policy 19 Car Parking
+	X	-	+	+	+	+	X

8. Appraisal of alternatives and the cumulative effects of the plan

8.1 Outlining the different approaches that could have been included in the plan as well as different site options is an important part of the SA process. Analysing reasonable alternatives demonstrates that the most sustainable options for the plan have been identified. This part of the appraisal process considers different spatial strategies for the plan, it then goes onto examine the effects on the sustainability of the area if a plan is not “made”. This is the main alternative in terms of policy options for the plan. Finally, the main sites that have been excluded from the Plan have been appraised. The previous Pre-Submission Plan included sites that are no longer allocated. Appraising these potential sites is, therefore, a reasonable alternative to those in the current plan.

a) Alternative options - spatial strategy

8.2 The spatial strategy for the plan is set out in Policy 1; the appraisal for this is in section 7c of the SA. This defines the built up area boundary for Storrington, Sullington and Washington. It supports appropriate development within these boundaries; particularly if they are on previously used land. The exception to this is for an area at Old London Road, near Washington where the plan supports the allocation of development but restricted to sites allocated through Policy 2 or that are infill or extensions to existing buildings. Policy 1, combined with the seven housing sites which form Policy 2, allocates a total of 194 dwellings in the plan.

8.3 Spatial alternatives are only reasonable alternatives where they accord with policies in the HDPF. Hence, an approach that is more universally positive towards development that is not adjacent to the built- up area boundaries, as defined in the plan, or that fall within the boundaries of the national park would not be reasonable. The alternative spatial approaches that have, therefore, been appraised are:-

- Spatial Option A - to restrict development to within the current built-up area boundary (BUAB)
- Spatial Option B – to restrict development to within and directly adjacent to the current built-up area boundary.
-

SA Objectives	Housing	Community Facilities	Biodiversity	Landscape	Heritage	Transport	Economic Development	Flooding	Environmental Quality
Policy 1	+	+	+	+	X	-	+	X	-
Spatial option A (within BUAB)	X	X	-	-	X	+	X	X	-
Spatial option B (adjacent BUAB)	+	+	X	X	X	X	+	X	X

- 8.4 Spatial option A would not deliver the level of housing to meet the needs of either of the parishes in the plan area. No housing sites would be allocated in Washington and there would be fewer allocated in Storrington. This would mainly be because the development at Ravenscroft allotments would not be allocated.
- 8.5 The Housing Alignment Study, which forms part of the evidence base for the Neighbourhood plan, calculates that 894 houses would be required in both parishes up to 2031 (based on the methodology in the report). It goes on to indicate that a provision of approximately 200 dwellings in the plan is reasonable given the significant environmental constraints in both parishes. This represents 13% of the 1,500 dwellings that the HDPF requires Neighbourhood Plans across the district to allocate. Any reduction in the number of houses allocated in the SSWNP reduces the contribution to this target and also restricts the provision of much needed affordable housing.
- 8.6 Delivery of fewer houses would also have a negative effect on the support and provision of community facilities as well as economic development. If sites are only concentrated within the built up area boundary no sites would be allocated for employment. There could also be a negative effect on heritage assets as these are predominantly located within the settlements. In terms of Storrington village there would also be a negative effect for the flooding objective. With fewer houses being allocated there would be fewer transport movements and more sustainable forms of transport are likely to be used. Hence, the effect on air quality and the environmental quality objective would be neutral.
- 8.7 Spatial option B would result in more housing sites being allocated (potentially an additional 584 homes if all of the sites within and adjacent to the built up area boundary, where the housing numbers are stated, were allocated). This would make a positive contribution to the housing, community facilities and economic development objectives of the SA. However, the objectives relating to the environment would be negatively affected due to the scale and location of the allocations. Storrington and Sullington parish is very constrained due to high landscape quality particularly with the proximity of the national park. In the case of Washington village this is located within the national park. Biodiversity and heritage assets are also located adjacent to the settlement boundary. With an increased number of housing, traffic levels could increase with a detrimental effect on air quality. Though in some cases there would be access to alternative forms of transport.
- 8.8 In conclusion, the spatial strategy proposed for the plan has fewer negative effects as it seeks to balance the need for housing to meet local needs against the significant environmental constraints that exist in the plan area. As outlined in section 7 (appraisal of the spatial strategy) there could be negative effects from the spatial strategy in Policy 1 on the heritage and flooding objectives. This is due to the concentration of development in the built up area boundary and the location of these assets and a high risk of flooding within Storrington. However, these potential negative effects are likely to be mitigated by appropriate policies in the plan and higher level plans (though amendments to the plan are suggested which would strengthen its approach on these issues).

b) Alternative policy approach

- 8.9 The main reasonable alternative for the policies in the plan is the “do nothing scenario”; that is the effect of the sustainability of the area if the Neighbourhood Plan is not in place.

Considering the effects of sustainability without the plan is also a requirement of the SEA Directive.

- 8.10 Without the Neighbourhood Plan proposals for housing development in the parish would not be guided by the local community to ensure that a mix of housing, including affordable housing, is provided in locations that the community supports and that reduce the impact on the local environment. For example, the Plan designates Local Green Spaces which provides protection from development for green spaces that the local community values. Other environmental assets, such as ecology and landscape are also afforded greater protection from the Neighbourhood Plan.
- 8.11 With the significant environmental constraints in Washington parish less housing would be allocated in this area without the Neighbourhood Plan. There would also be a reduction in the number of both market and affordable housing in Storrington village.
- 8.12 Surveys by the Steering Group have shown that the community in Storrington is concerned about the impact of the scale of housing development over the last 10 years on the character of the village and the ability of local infrastructure to cope with the increased demands that this development has brought. The Neighbourhood Plan can help to balance the need for more housing to meet local needs with the need to conserve the local environment. This a particular concern given the extent of environmental assets (high quality landscape, SSSI's, Conservation Areas and Listed Buildings) in the plan area which limits the opportunity for development
- 8.13 The plan seeks to rejuvenate the provision of employment land in the parishes, and when possible, to move poorly located employment land away from residential areas to sites adjacent to the A24 which have better highway access. The plan has allowed a local spatial strategy for the local economy to be developed. Without the plan this positive change would not be achieved as the District Council would rightly be concerned that the loss of protected employment land would not be compensated for elsewhere in this area.
- 8.14 A significant local issue is traffic congestion along the A283, A24 and in Storrington village. Although much of this traffic is generated outside the plan area developing the plan provides the framework to further control the scale of development in the area to reduce this effect and complement policies in the HDPF and other development plans. The plan also gives an opportunity to contribute to the policies which seek to improve air quality in the centre of Storrington.

c) Alternative sites

- 8.15 Sites within, or adjacent to, the built up area boundary of Storrington and Washington could be considered to be reasonable alternatives to the allocated sites as these would conform to the overarching spatial strategy for the allocation of housing. Sites which are situated within the South Downs National Park and are not adjacent to the built up area boundaries are generally not reasonable alternatives, as generally these would not comply with the spatial strategies in the HDPF and the SSWNP. There were a number of sites that were submitted for inclusion in the plan that are either within or adjacent to the built up area boundary and are not within the national park. These are set out in Table 5 with the main reasons for why they were rejected (more detail is included in the Site Assessment Report).

Site	Reason for rejection
The Glebe Field, Monastery Lane*	Consent granted on a smaller site for new doctor's surgery and 9 dwellings. Larger site would have a detrimental impact on the adjoining Listed Building and Conservation Area
Storrington Squash Club, Greyfriars Lane*	Loss of a community facility which is contrary to policy in the HDPF as well as potential impact on Listed Building and Conservation Area
The Yard, The Street, Washington*	Small site and would impact on the setting of adjoining Listed Buildings and Conservation Area
Land off Amberley Road, Storrington	Two appeals dismissed on this site for 45 and 30 dwellings on grounds of impact on a Listed Building, impact on rural character and views from the national park
RAFA site, Washington Road, Sullington	Main constraint is the unstable condition of the adjoining quarry
Field at the end Downsview Avenue, Sullington	Site is designated as local greenspace in the SSWNP
Fryern Road Field, North of Melton Drive, Storrington	Previous applications for dwellings on the site have been refused due to impact on the local landscape and harm to the setting of a Listed Building
Oak House, Rock Road, Washington	Area has low density housing with large individual dwellings in a wooded area. Some distance from facilities and Rock Road is a narrow rural road.
Land adjacent to Clay Lane, Storrington	The scale of development proposed could impact on the rural landscape and views from the national park. The site also borders the grounds of a Grade I Listed Building.
Chantry Lane Industrial Estate, Storrington	Considered in more detail in paragraphs in 8.18 (only adjacent to the built up area boundary if considered with Chantry Quarry)

Table 5 – Sites rejected for inclusion in the SSWNP that could be reasonable alternatives

**Sites within the built up area most of the remainder are adjacent to the built up area boundary apart from Chantry Lane Industrial Estate*

Site	Reason for rejection
Land off of Kithurst Lane, Storrington	Developing the southern part of the site could have a negative landscape impact and access to the site. The potential new access points to the site could also have a negative effect on townscape and on the setting of the conservation area. These constraints make vehicular access to the site difficult to achieve.
Land off of Fryern Road, Storrington	The main potential negative effects are on views from the national park, impact on the rural character of the area and due to the scale of development reducing the gap between two villages. Evidence has not been provided that safe and secure pedestrian access can be provided from the site to the centre of Storrington
Chantry Quarry, off of A283, Storrington	Loss of mineral resources is contrary to minerals planning policy. Impact on an SSSI (though there is the potential for this to be mitigated). New access road would be situated in the national park with a subsequent negative landscape impact.

Addendum to Table 5 – Additional sites rejected for inclusion in the SSWNP (all are adjacent to the built up area boundary)

- 8.16 The previous version of the Pre-Submission Neighbourhood Plan (dated June 2016) allocated sites using a different methodology for assessing the sites. This resulted in the allocation of two sites which have been excluded from the current iteration of the plan. These sites were

Lucking's Yard near Washington and Chantry Lane Industrial Estate, Storrington. An SA of these sites is included in Appendix 5 as these are considered to be reasonable alternatives for inclusion in the plan

- 8.17 Lucking's Yard is located in the same area as The Vineyards, Old London Road which has been allocated for housing. Both sites are some distance from the built up area boundary of Washington and are, therefore, in a rural location as defined by the HDPF. Allocating both sites is considered to be overdevelopment in such a location. As The Vineyards site has less constraints this is the most sustainable option and has been allocated on the basis of meeting the local housing needs for Washington in compliance with Policy 2 of the HDPF.
- 8.18 A more detailed assessment for the Chantry Lane Industrial Estate, which includes the full range of sustainability issues, has identified potential negative effects in relation to this site. The Examiner's Report also expressed concerns over the allocation of the site without evidence to indicate how the many constraints that relate to this site could be mitigated. Additional evidence has been provided but this has not been sufficient to overcome some of the fundamental issues with this site. More details are given in Appendix 5 but the most significant issues relate to the loss of employment land, flooding, access to the site for pedestrians and cyclists and potential impact on a Listed Building. Given the location next to the national park a full landscape strategy would be essential for the site.
- 8.19 During the consultation on the Pre-Submission Plan an objection was received that sites that could be considered to be reasonable alternatives had not been adequately appraised (which the EU Directive requires). Appendix 6 contains a summary of the representations received during the consultation on the Pre-Submission Plan which relate to the SA. It also includes a response to the comments and indication of any subsequent changes that have been made to the SA.
- 8.20 All of the sites listed in Table 5 are considered to be the reasonable alternatives and have now been fully assessed against the SA Framework. Appendix 5 contains the outcome of the appraisal. In addition, three sites were submitted for inclusion in the plan during the Pre-Submission consultation. These consist of two additional housing sites (land adjacent to Fryern Road, Storrington and land adjacent to Kithurst Lane, Storrington) and a site for commercial use (Chantry Quarry, off of A283, Storrington). These are listed in an addendum to Table 5 and the full appraisal is included in Appendix 5.
- 8.21 Chantry Quarry was submitted by the landowner for commercial use during the Pre-Submission consultation and linked to the redevelopment of Chantry Lane Industrial Estate. As the two sites are linked the justification for excluding Chantry Quarry is set out here. The reason for linking both of these sites is that development in the quarry would provide replacement commercial floorspace for that lost by redeveloping the current Industrial Estate. Other advantages are that the sites are adjacent to each other and are near to the centre of Storrington village. However, the appraisal has identified a number of potentially significant negative effects which therefore, impacts on the appraisal of Chantry Lane Industrial Estate. It should also be noted that not all of the current business operating from the Industrial Estate are likely to be suitable for a business park.
- 8.22 The first constraint is the loss of a mineral resource which would be contrary to minerals planning policy. No evidence has been provided to indicate that this approach would be supported by the Minerals Planning Authority. The site is currently designated as a Site of

Special Scientific Interest due to its geological interest. The landowner has outlined a solution that would retain the iron grit and make it available for public viewing. Confirmation has not been received from Natural England that the extent and location of the retained iron grit layer is acceptable. Adopting the precautionary principle the impact on the SSSI is considered to be a significant negative effect. It is, however, acknowledged that there is the potential for this impact to be mitigated.

- 8.23 The other main constraints are access to the site and landscape impact. An indicative layout submitted by the landowner suggests a new access to the site from the A283 (at the junction with Water Lane and Sullington Lane). No evidence is provided that the proposed new access road would be acceptable to the Highway Authority. The access road would cross a field which lies within the boundary of the national park. This would, therefore, have a negative landscape impact. Even if this concept design does not proceed any access road that joins the A283 is likely to go across land that falls within the national park. Most of the site is sunken, giving limited views from the national park. However, if the site is allocated a full landscape and visual assessment and strategy would be required as the eastern part of the site lies within the national park boundary.

d) Cumulative effects

- 8.24 Cumulatively the plan is likely to make a positive contribution to housing, economic development and community. However, there are also likely to be some cumulative negative effects.
- 8.25 Concentrating development within or adjacent to Storrington village will increase traffic through the village which is already subject to an Air Quality Management Area. This effect could also be exacerbated by the spatial strategy for moving business and industrial uses that are poorly located in Storrington to areas adjacent to the A24. However, the levels of new development allocated in the plan are not very high and are, therefore, the impact on poor air quality in Storrington is unlikely to be significant. Indeed, concentrating development within or adjacent to Storrington would be more likely to encourage the use of sustainable forms of transport. Furthermore, changes to Policy 18 since the previous Pre-Submission Draft, support the creation of infrastructure which would encourage walking and cycling. This could be strengthened by supporting the provision of infrastructure for low emission vehicles. In terms of relocating businesses to the A24 which is less accessible to residents in the plan area, this could be mitigated by encouraging businesses in these locations to formulate and implement Travel Plans.
- 8.26 There is also a potential effect on the landscape with both the spatial strategy and site allocations giving rise to new development on the edge of Storrington village. However, only one site is allocated in the plan on the edge of Storrington and the site in Washington parish is located outside the national park and would not have a negative effect on the landscape.
- 8.27 Concentrating development within the built up area boundary could increase the risk of flooding due to increased surface water run off combined with the existing flood zone with the River Stor which runs through the centre of Storrington. Although higher level plans and policies would address this issue the plan would be strengthened by reiterating the need for a sequential test for sites within Flood Zone 2 and 3 and also for development to encourage measures that would reduce flood risk, such as sustainable urban drainage systems.

- 8.28 A further potential impact from this spatial and site allocation approach is a cumulative effect on heritage assets; as these are concentrated in the centre of Storrington and much of Washington village. However, given the scale of the development proposed in the plan and policies to control these impacts, overall this effect is unlikely to be a significant.
- 8.29 The cumulative effects relating to flooding and air quality would not be relevant for Washington parish. A positive effect for both parishes would be to further safeguard the high quality built and natural environment of the plan area. This could have a cumulative negative effect of restricting opportunities to provide housing and employment sites. However, the spatial strategy of the HDPF ensures that housing needs would be met in less constrained parts of the district.
- 8.30 Overall the plan balances the need to provide housing to meet the needs of both parishes with the environmental constraints of the area. The plan seeks to deliver 194 homes which the Housing Alignment Study states would make an appropriate contribution to the requirements of the HDPF.

9. Mitigation measures and monitoring

- 9.1 The SA has identified potential negative and positive effects arising from the plan. Potential changes to policies in the plan are detailed in section 7c of the SA whilst suggested mitigation measures and enhancements to the allocated sites are set out in section 7b.
- 9.2 In addition to these specific changes there are some general issues that have been identified through the appraisal process. The plan is generally positive in terms of socio-economic issues and certain environmental issues such as biodiversity and landscape, for example, protecting designated Local Green Space and enhancing green infrastructure. However, there are areas where the plan is not as strong. Flooding is not addressed in the plan despite the presence of Flood Zone 2 and 3 in Storrington. Although national policy and higher level plans deal with this, the plan would be strengthened by some additional text on this local issue. This could refer to the presence of this flood zone and the need for mitigation measures such as incorporating sustainable urban drainage systems.
- 9.3 The potential for negative effects on heritage has been identified at a strategic level for both Storrington and Washington due to the presence of Conservation Areas in both of these villages. Again higher level plans provide protection for such designations and so the effect is not likely to be significant. Nevertheless, the plan would be strengthened by including a reference to the presence of these Conservation Areas and the need to protect and enhance them.
- 9.4 The final potential negative effect relates to transport and the impact on poor air quality in Storrington. Although the plan encourages infrastructure provision for cycling and walking (as per Policy 18) this could also seek to provide cycle parking and electric vehicle charging points. The plan encourages employment to relocate adjacent to the A24 which is less accessible. This could have a negative effect by increasing traffic to this location. The suggested mitigation is to amend the plan to require businesses in this location to formulate and implement Travel Plans to reduce car use.
- 9.5 The sustainability effect of the Neighbourhood Plan should be monitored for both its positive and negative impacts. The most significant effects to be monitored will be in terms

of the provision of smaller housing units, the number of affordable units constructed, impact on air quality and landscape and incidence of flooding.

- 9.6 This monitoring will take place using the measures identified in Table 4. The data for some of these measures is collected by Horsham District Council in its Authority Monitoring Report as well as the South Downs National Park Authority. In other cases, the Parish Councils will endeavour to collect data to report on the progress of the plan.

10. **Summary and Next Steps**

- 10.1 This report presents the findings of the SA and the SEA process for the Submission Draft of the Storrington, Sullington and Washington Neighbourhood Plan. The SA has been revised from the previous SA (dated June 2016). The SA includes updated baseline information and revisions to ensure that the relevant issues required by the EU Directive have been included. It also includes additional relevant plans and programmes. A revised methodology has been used to appraise the plan which is closely aligned to the new approach used in the Site Assessment Report. An appraisal has been undertaken of the strategic approach in the plan against two other options. The site allocations were appraised as were the policies. The latter also considered the “do nothing” scenario for the sustainability implications if the plan was not in place. All sites within and adjacent to the built up area boundary were appraised. These sites were considered to be reasonable alternatives to the allocated sites as they conform to the strategic policies in the HDPF and the SSWNP. Finally, the cumulative effects of the plan were also identified.
- 10.2 Recommendations have been made for changes that would strengthen the Plan and also mitigate any potential negative significant effects. This leads onto a suggested regime to monitor the significant positive and negative effects.
- 10.3 The SA was published for consultation alongside the Pre-Submission draft of the Neighbourhood Plan under Regulation 14 of the Neighbourhood Planning Regulations 2012 for a period of 6 weeks from 10th July to 4th September 2017. Comments on the content and findings of the SA were received during this period. These are summarised in Appendix 6 with an explanation of any updates or changes to the SA.
- 10.4 None of the changes to the non-site specific policies required a further appraisal of these policies to be undertaken. The mitigation measures identified in this SA have been included in the Submission draft of the Neighbourhood Plan. The current updated version of the SA forms part of the evidence base for the Submission SSWNP.