

# Storrington, Sullington & Washington Neighbourhood Plan 2018 - 2031

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## Further Initial Comments of the Independent Examiner

**Prepared by**

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**26<sup>th</sup> June 2018**

## Introduction

1. As you will be aware I have been appointed to carry out the examination of this Neighbourhood Plan. I have carried out my initial assessment of the Plan and all the accompanying documents that I have been sent. I have also spent half a day, visiting the neighbourhood area to familiarise myself with the Storrington, Sullington, Washington and the surrounding countryside.
2. On 25<sup>th</sup> May 2018, I issued an Initial Comments document which concentrated on the status of the Qualifying Body(QB). I have now received a response which has allowed me to proceed with the examination.
3. Whilst it is normal practice for examinations to be dealt with just on the basis of the consideration of the written material, the legislation does allow for the holding of a public hearing if it would assist the examination.
4. I have concluded that a hearing dealing with some specific issues, would help me come to a conclusion as to the how the plan meets three of the basic conditions. These are:
  - Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan
  - The making of the plan contributes to the achievement of sustainable development
  - The making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.
5. However, there are some issues where I have questions or wish to invite further representations which can be dealt with by an exchange of written material and do not need to take time up at the hearing. That does not mean that the issues involved are of any less importance.

## Matters that can be dealt by way of written submissions.

### Mapping Issues

6. I have major concerns regarding the quality of the mapping associated with the neighbourhood plan. For a neighbourhood plan to pass the basic conditions, it should be capable of being used with confidence by decision makers. There should be no debate as to whether a policy applies to a development proposal. The neighbourhood plan has an OS base plan shown on Page 45 showing the extent of the plan area and boxes that show 5 inset maps which are shown on pages 46 to 50. There appears to be no designations on land outside the inset maps but it is clear that policies and designation apply to these areas. The extent of Inset Plan 1 does not coincide with the extent shown on the Page 45 Map, which shows it extending to almost the edge of the Plan area. It does not indicate the full

extent of the built-up area boundary (BUAB) and the plan's key obliterates part of the plan area. Inset 2 overlaps with Inset 1 but the designations for the same piece of land are inconsistent between the two plans e.g. LGS 12 and 4. The plan should be clear that the notation on any piece of land should be consistent whichever inset plan is being looked at.

7. There are a large number of policies which need to identify where the provisions of that policy apply. Most should be identified on the Policy Maps or on individual maps, so there is clarity whether a policy applies to a specific location. These are as follows:
  - a) Policy 8 refers to the views to and from the countryside which are important to local people but it does not state which views are to be protected, so an applicant would not know whether his/ her proposal would affect views referred to by the policy. Equally a decision maker will need to know whether a view is one of the valued views to be protected. The specific views and viewpoints need to be described, identified and shown on a Plan.
  - b) The extent of the 100m A24 corridor needs to be shown on a map so an owner would know whether his / her site was covered by Policy 3.
  - c) Policy 6 refers to housing proposals within the Storrington village centre. The area covered by that designation needs to be shown on a map.
  - d) Policy 7 refers to the acceptability of shop uses within the Washington Village Centre. Again, the extent of the centre needs to be clearly shown so as to indicate where the policy applies.
  - e) Policy 9 states that the Plan indicates the "broad location of green gaps between Storrington and Sullington and Washington villages and between the 2 parishes and neighbouring parishes" I have not seen where these green gaps have been identified and the extent of the green gaps needs to be shown on a plan.
  - f) The plan document refers to the extent of The Glebe Local Green Space (LGS) not being fixed. Has it now been fixed and can it be shown on a Plan?
8. I will invite the QB to work with the LPA with a view to producing maps for examination that address these concerns.

## Questions to be dealt with by Written Comments

### Infilling

9. In policy 1, does the plan proposed presumption in favour of up to 5 houses outside the BUAB apply to land in the South Downs National Park? How does the plan define “infill development” and does the QB consider the “extension of existing buildings” to constitute “infilling”?

### Public Opposition Criteria

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

### Sequential Testing for Development in Areas Liable to Flooding

11. When carrying out a sequential test, in terms of having to allocate residential development in areas liable to flood, should the assessment be that there are other sites available that do not flood, rather than in the case of Old Ryecroft Allotment site which appears to take into consideration other site selection criteria beyond flooding? In terms of the above site will the prohibition of habitable accommodation on the ground floor, still allow an acceptable design solution or will it provide just blank garage and storage uses at ground level? Whilst referring to that site can either the LPA or the QB confirm that the site has a right of access across the Council car park or the vet’s car park. I need to be satisfied that this is a deliverable site.

### Paulo Rosa Site

12. I would welcome comments as to whether the “Paulo Rosa” site should still be a plan allocation now that planning permission has been granted and importantly, construction is well underway. Would it be better to note the site as a *commitment* rather than a *plan proposal*?

### **Old Mill Drive**

13. Is there any reason why the Land at Old Mill Drive cannot be changed from a reserve site to an allocation site, as it appears from my site visit that the site is ready for development? Can the QB clarify what the criteria is for the triggering a reserve site to be permitted for development?

### **Air Quality Management Area**

14. It appears to me that Policy 17 merely duplicates existing planning policy which already covers Storrington's Air Quality Management Area. What is the value of a neighbourhood plan policy that merely repeats existing policy without any additional local dimension?

### **Local Green Space Designation**

15. Can the Qualifying Body confirm that all the landowners whose land is designated as Local Green Space were contacted before the site's designation as set out in the Planning Practice Guidance on Local Green Space. Can I be shown copies of that correspondence?

### **Chantry Industrial Estate**

16. I would welcome the Qualifying Body's comments on the Regulation 16 comments submitted on behalf of the owners of the Chantry Industrial Estate.

### **North Farm**

17. Can the South Down National Park planners be asked to provide me with details of the Whole Estate Farm Plan for North Farm and can they confirm that measures are in place that will provide the mechanisms to ensure occupation of buildings meets the criteria set out in Policy 4 under some form of planning control?

## **Questions to be Dealt with at the Public Hearing**

### **Level of Housing**

18. I note that the quantum of housing now proposed in this version of the neighbourhood plan has been reduced compared to earlier versions. I would like to hear the views of invited parties as to whether the amount of development is an appropriate bearing in mind the plan area's status in the settlement hierarchy set out in the Horsham District Planning Framework and does it provide for the level of housing need for the area. I would ask whether the LPA and the QB have any comments to make on the Assessment of Housing Needs submitted by GVA on behalf of Gladman Developments Ltd.

### **The Vineyard**

19. in view of the comments made by the previous Examiner – I request representations as to whether The Vineyard allocation site is still considered to be a “sustainable location” for housing development, in view of its distance from local facilities.

### **Ravenscroft allotments**

20. I have noted that the Ravenscroft Allotment allocation has been reduced from 70 to 35 dwellings, based on concerns regarding the impact on views from the National Park. I would wish to hear evidence on the actual extent of harm and whether the new figure is based on an objective assessment of the capacity of the site. I will explore whether more development could be achieved and I would wish to discuss whether the site elements are still achievable at this density, especially as the neighbourhood plan is not proposing any additional development to address the shortfall caused by this reduction in housing numbers.

### **Longbury Hill**

21. I wish to invite representations as to whether Longbury Hill really meets the criteria for designation as a Local Green Space as set out in the NPPF. I will be seeking views as to whether a site at 10ha could be described as an extensive area of land.

### **Land at Downview Avenue**

22. Also on the subject of the proposed LGS designations, I would also invite submissions on whether Land at Downview Avenue is appropriate to be allocated as LGS.

### **Angells Sandpit**

23. I would invite further evidence to support the allocation of Angells Sandpit as a residential site. I note that Natural England has recommended a 20-m buffer with the adjacent SSSI. Based on what evidence did the QB rely when setting the buffer at 15 m? I also need to be satisfied that an appropriate access for 6 houses can be achieved and on land within the control of the landowner. I would find it particularly helpful if an illustrative layout could be prepared, which demonstrates how the site could be developed in the manner proposed. This would help me to understand the impact of the allocation on the adjacent listed building. I would ask whether the LPA has any information, perhaps from Environmental Health colleagues as to whether there are any land contamination issues that could prevent residential development as one representation refers to the site emitting methane gas, as a result of historic landfill. I would also ask for the QB's views on the representation that the BUAB should be extended so as to link with Water Lane which has been suggested would be a more logical and defensible boundary.

## Concluding Remarks

24. I hope that this note is useful in explaining to parties, the areas I wish to look at, by way of a public hearing as well as by additional written submission, to allow me to progress with my examination of this neighbourhood plan. I will now discuss logistics with the principal parties on how and when this can be achieved. Once arrangements have been made, I will issue a further note setting out how the hearing will be conducted and who should be invited. I will also issue an agenda for the day. I will also set a timescale for the receipt of the written comments.

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