

Storrington, Sullington & Washington Neighbourhood Plan 2015-2031

**Sustainability Appraisal/
Strategic Environmental Assessment
(‘Environmental Report’)**

Published by Storrington & Sullington Parish and Washington Parish Councils for consultation under the Neighbourhood Planning (General) Regulations 2012 and in accordance with EU Directives 2001/42.

July 2015

NON TECHNICAL SUMMARY

1. The purpose of this Environmental (Sustainability Appraisal/Strategic Environmental Assessment) Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission version of the Neighbourhood Development Plan for Storrington & Sullington and Washington Parishes
2. The report provides an assessment of the Neighbourhood Plan objectives and policies and seeks to do so in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The full social, economic and environmental baseline data are contained in the Neighbourhood Plan State of the Parish report, which is available in the evidence base.
3. The Neighbourhood Plan contains a number of policies for the use and development of land in the area in the plan period from 2015 to 2031. These policies, together with the policies of the development plan, that is the Horsham Core Strategy 2007 - to be replaced shortly by the forthcoming Horsham District Planning Framework (HDPF) and 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 in due course.
4. An important sustainability issue in the Parishes to which the Neighbourhood Plan responds is the scale of recent housing development schemes with planning consent or that have been completed in Storrington & Sullington in the last decade. Although as a larger village that benefits from the presence of key public services and of a viable and vital village commercial centre, this development has concerned local people in respect of how it may change the character of Storrington & Sullington and affect its infrastructure.
5. Important too is how future development proposals will impact on the existing traffic congestion through Storrington Village Centre specifically and along the A283 more generally. Much of this problem relates to traffic being generated by and destined for locations well beyond the parishes and is often caused by traffic avoiding congestion on the A27 trunk road to the south. It is therefore accepted that the Neighbourhood Plan will not be able to directly address the underlying causes of congestion but it can draw attention to the matter and complement other development policies on managing air quality for example.
6. Further, the long term future location and type of employment provision in the area is uncertain. The village of Storrington & Sullington has had a range of industrial estates and businesses for many years. There are also some large businesses located along the A24. However, not all of this land is as well located as it may once have been, given the growth of residential areas over the last thirty years or more. In addition, some premises are the legacy of pre-land use planning system decisions and are of an age where wholesale replacement and redevelopment may be necessary by 2031. In both cases,

the consequences are modern-day conflicts between these industrial uses, the amenities of adjoining residential areas, the impacts of traffic and the detrimental appearance of unsightly buildings on the scenic beauty of the National Park. This has led the Plan to consider a long term strategy of the gradual relocation of poorly located and/or redundant employment uses to better located sites in the parishes.

7. Without the Neighbourhood Plan, proposals for housing development in the parishes would be left to individual planning applications. This would make little difference to controlling the environmental impact of those proposals as they must in any event demonstrate that they conform to development plans and NPPF policy. Rather, the Neighbourhood Plan emphasis is on delivering a series of proposals that have positive social and economic outcomes within the environmental limits imposed by the HDPF and by the National Park.

8. The SSWNP Area is located within 15km of a nature site of European importance, the Arun Valley SAC/SPA/Ramsar site beyond Pulborough some 8km to the west. The Habitat Regulations Assessment (HRA) of the HDPF indicated that development proposals in this part of the district may affect that nature site by way of undermining water quality and/or a disturbance to some bird species. Natural England has indicated that, given the scale, nature and distribution of development proposals supported by the Plan, an HRA of its policies may be required to be submitted with the Submission Neighbourhood Plan in due course. This will need to demonstrate that the proposals of the Plan will not cause any significant effects on that site. There are Local Nature Reserves (LNR), Sites of Special Scientific Interest (SSSI – notably at Sullington Warren and at Chantry Mill), and Sites of Nature Conservation Importance (SNCI). These are identified and described in the Scoping Report in Appendix A. Priority Habitat areas have been identified by Natural England. There are Ancient & Semi-Natural Woodland and some Traditional Orchard Priority Habitats. The Parish contains one Grade I, two Grade II* and a large number of Grade II listed buildings and structures. There are sixteen scheduled monuments in Storrington & Sullington Parish and none in Washington Parish. Both parishes have Conservation Areas, two in Storrington and Sullington and one in Washington.

9. In all respects, the relationship between the Neighbourhood Plan objectives and the sustainability framework is complementary, with the prospect of a number of positive impacts. The Plan objectives are positive about housing and employment development to maintain vibrant local communities and are especially keen to safeguard Storrington Village Centre. This should have a number of positive impacts in terms of sustaining local jobs, investing in the management of heritage assets and avoiding the need for too many shopping trips outside the parishes.

10. The assessment shows that in general terms the proposed policies have a neutral effect though some policies will have positive effects. There are no negative effects of the proposed policies. The positive effects relate especially to the range of policies aimed at sustaining local jobs and services. Not only are there likely to be positive economic impacts but the continuing vibrancy of the Village Centre and of local employment areas should reduce

the need for local people to have to travel outside the parishes for employment or services as much as may otherwise be the case.

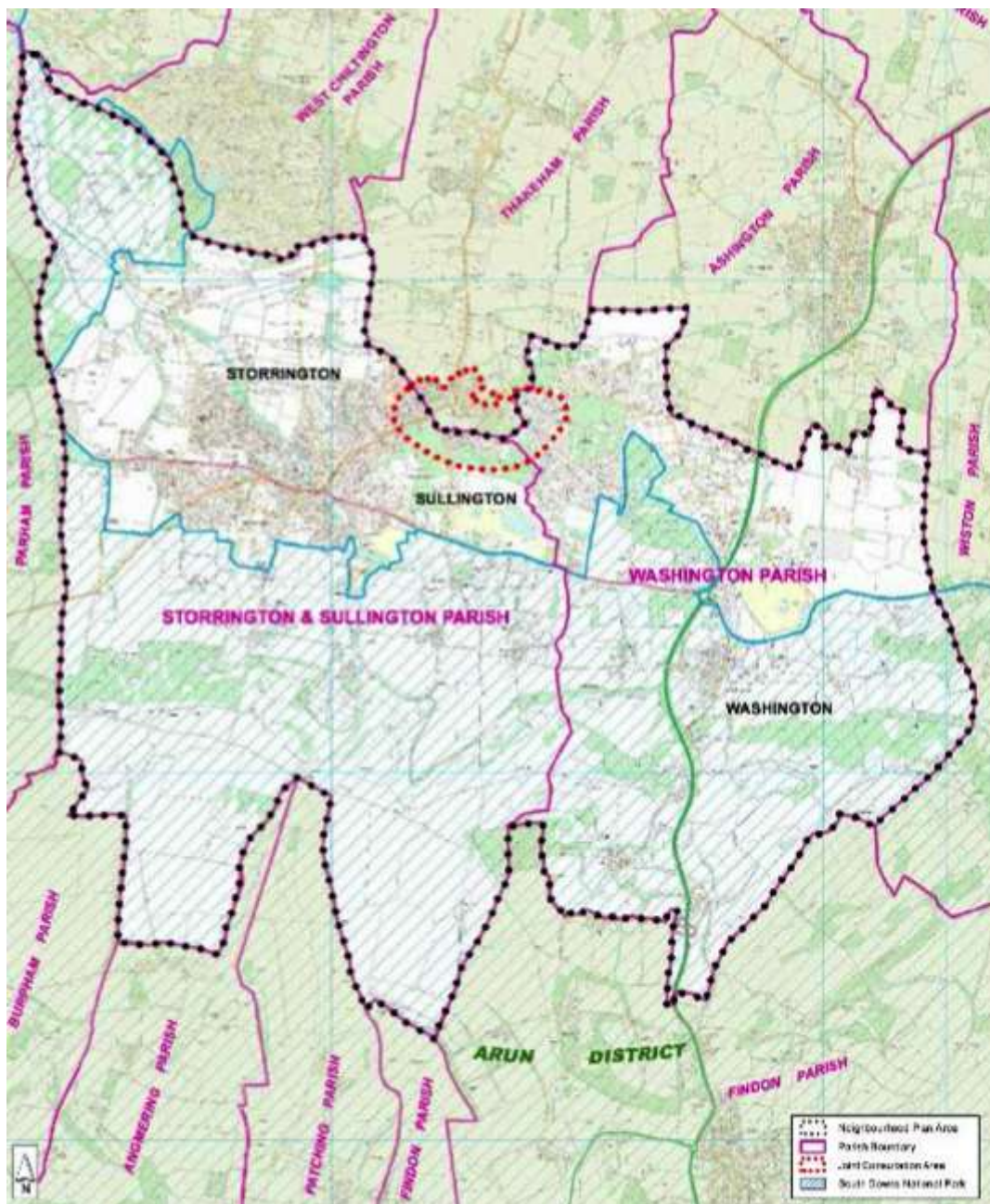
11. The overall scale of development supported (and that by the Thakeham Neighbourhood Plan) represents a modest increase in the building stock and developed footprint of Storrington & Sullington. This may have a marginal effect on traffic movements through the village but it is hoped that the relocation and modernisation of some industrial sites may lead to fewer HGV movements in the village centre. However, the problems of traffic in the parish are not ones that the Plan can manage other than at the margins.

12. In summary, therefore, the assessment shows that in general terms the proposed Neighbourhood Plan policies, both individually and cumulatively, will have primarily neutral effects though some policies will have positive effects. There are no negative effects of the proposed policies.

13. The Neighbourhood Plan proposes that the progress in its implementation will be assessed using the measures identified in the report. The data for some of these measures are collected by the District Council in its planning monitoring reports. In other cases, the Parish Councils will endeavour to collect data on an annual basis to report on the progress of the plan.

1. Introduction

1.1 The purpose of this Environmental (Sustainability Appraisal/Strategic Environmental Assessment) Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission version of the Neighbourhood Development Plan for Storrington & Sullington and Washington Parishes ("the Neighbourhood Plan") in accordance with the Neighbourhood Planning (General) Regulations and the EU Directive 2001/42 on strategic environmental assessment. Plan A below shows the designated Neighbourhood Area.



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

1.2 The Neighbourhood Plan is now published for submission by Storrington & Sullington and Washington Parish Councils ("the Parish Councils") to Horsham District Council ("the District Council") for examination under the Neighbourhood Planning Regulations 2012. This follows consultations on Pre Submission Plan during January to March 2015 and a Revised Pre Submission Plan during May to June 2015, for which Draft SA/SEA reports were prepared and were also consulted on respectively.

1.3 The lead local planning authority, Horsham District Council, has issued a screening opinion requiring a strategic environmental assessment of the Neighbourhood Plan and the Parish Councils have chosen to meet this obligation by preparing a Sustainability Appraisal (SA), incorporating a Strategic Environmental Assessment (SEA) under the Environmental Assessment of Plans & Programmes Regulations 2004. As shown on Plan A, part of the designated area falls within the South Downs National Park ("the National Park") and the National Park Authority is the local planning authority for that area.

1.4 A Scoping Report was consulted on in September - October 2014 in line with the Regulations, and is attached as Appendix A. The comments received on the proposed scope of sustainability objectives have been supportive – the objectives are set out in Section 7 of this report.

1.5 The report provides an assessment of the Neighbourhood Plan objectives and policies and seeks to do so in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The full social, economic and environmental baseline data are contained in the Neighbourhood Plan State of the Parish report, which is available in the evidence base. A summary of the most relevant data was also included in the scoping report.

1.6 The parish councils are mindful of the representation on the first Draft SA/SEA by the South Down National Park Authority. This made a series of suggestions and requirements of how the submitted or revised SA/SEA report should be modified to meet the provisions of the 2004 Regulations. Some of those suggestions have been taken into account in the preparation of this report. Others are not considered necessary to meet the 2004 Regulations as they require disproportionate and irrelevant data, information and analysis for the purpose of assessing the environmental effects of the Plan policies. They also sought to impose an unduly prescriptive approach to identifying reasonable policy alternatives and to measuring cumulative effects. Though such an approach may also be appropriate for this purpose, it is not considered obligatory to meet the Regulations, as has been demonstrated through many other neighbourhood plan examinations.

1.7 Instead, a number of minor changes were made to the Revised Draft SA/SEA and these appear to have satisfied the Authority of the validity of approaching this task in this way.

2. Background to Sustainability Appraisal & Strategic Environmental Assessment

2.1 Through the Sustainability Appraisal (SA), the social, environmental and economic effects of the Neighbourhood Plan are tested to ensure that these promote sustainable development. There is no requirement for a Neighbourhood Plan to undertake an SA.

2.2 However, a Strategic Environmental Assessment (SEA) may be a requirement of a Neighbourhood Plan and, where so, this may voluntarily be incorporated within an SA where there may be significant environmental effects to be screened out. As set out above the District Council issued a screening opinion indicating that an SEA would be required for the development of the Neighbourhood Plan. In this case, the parish councils have decided that this will be incorporated with an SA to consider the wider social and economic effects of the Plan. The appraisal involves the evaluation of the environmental impacts of a plan. The role of the assessment is as follows:

- An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- The environmental characteristics of areas likely to be significantly affected
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance
- 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
- 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
- The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan
- 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
- A description of measures envisaged concerning monitoring

2.3 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan focused on rural villages.

3. An outline of the contents, main objectives of the Neighbourhood Plan and relationship with other relevant plans or programmes

3.1 The Neighbourhood Plan contains a number of policies for the use and development of land in the Parishes of Storrington/Sullington and Washington in the plan period from 2015 to 2031. These policies, together with the policies of the development plan - that is the saved policies of the 2007 Local Plan - and the National Planning Policy Framework (NPPF), will be used by Horsham District Council ("the District Council") in determining planning applications once the Neighbourhood Plan is approved in due course.

3.2 At the time of the publication of the SSWNP, the development plan for Horsham currently comprises the policies of the adopted 2007 Horsham District Core Strategy Development Plan Document along with some General Development policies and site-specific policies. The Horsham District Planning Framework (HDPF) is expected to replace many of the current policies but it is uncertain if it adopted by the time of the examination of the SSWNP. In which case, the SSWNP seeks to be in general conformity with the strategic policies of the 2007 Core Strategy, including that part of the area that lies in the South Downs National Park until the new National Park Local Plan is adopted in 2017.

3.3 The 2007 Core Strategy contains a range of saved strategic policies, although it could not have anticipated the advent of neighbourhood planning. Of most relevance to the SSWNP are the following policies:

- Policy CP1: Landscape & Townscape Character – protecting, conserving and enhancing landscape and townscape character and biodiversity
- Policy CP5: Built Up Areas & Previously Developed Land – defining Storrington/Sullington as a Category 1 Settlement and Washington as a Category 2 Settlement for the purpose of locating new development of a scale appropriate to each settlement type and within defined built up area boundaries
- CP8: Small Scale Greenfield Sites – allowing for small scale extensions to the smaller towns and villages to meet identified local needs
- CP9: Managing the Release of Housing Land – managing the release of land for housing for delivery over the whole plan period
- CP11: Employment Sites & Premises – protecting employment land in Employment Protection Zones, including Water Lane in Storrington from loss unless justified
- CP12: Meeting Housing Needs – setting affordable housing provision on sites of 15 dwellings or more at 40%
- CP14: Protection & Enhancement of Community Facilities & Services – encouraging proposals for new facilities and protecting existing facilities including open spaces
- CP15: Rural Strategy – encouraging rural economic development in defined settlements including Storrington/Sullington and Washington
- CP17: Vitality & Viability of Existing Centres – identifying a retail frontage at Storrington Village Centre and generally managing the mix of retail and other uses in village centres

- CP18: Tourism & Cultural Facilities – promoting and managing tourism development to support rural diversification
- CP19: Managing Travel Demand – supporting development proposals which foster an improved and integrated transport network

3.4 However, as the HDPF is expected to be adopted in the near future, the SSWNP must anticipate its strategic policy framework. Importantly, the Inspector's Interim Report of his examination of the HDPF, which proposed the suspension of the examination until summer 2015, found its spatial strategy sound. This strategy identified a clear role for neighbourhood planning in the district in contributing to meeting local housing need. Whilst the total number of new homes needed in the district to 2031 will have to increase, their spatial distribution is not likely to change.

3.5 In which case, it is helpful to summarise the key strategic content of the HDPF. 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 (including) the allocation of sites ..." (para 2.11, p7).

3.6 The HDPF identifies a series of strategic 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' (Washington is identified as a 'Smaller Village' in the SDNP Local Plan (see Plan B below)
- Policy 4 Settlement Expansion – providing for the growth of settlements to meeting identified local housing, employment and community needs
- Policy 8 Employment Development – protecting existing employment sites and encouraging their appropriate expansion
- Policy 9 Rural Economic Development – encouraging development to promote local employment opportunities
- Policy 11 Vitality & Viability of Existing Retail Centres – defining Storrington as a 'Secondary Centre' in the district retail hierarchy
- Policy 12 Town Centre Uses - managing the mix of village centre uses
- Policy 14 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 23 Environmental Protection – minimising the impact of emissions of pollutants, including air pollution
- Policy 24 Natural Environment and District Character – protecting the landscape, landform and development pattern of the District

- Policy 25 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 29 Protected Landscapes – identifying the setting of the South Downs National Park
- Policy 31 Quality of Development – ensuring development schemes understand and respond to their context
- Policy 33 Cultural & Heritage Assets – managing development affecting heritage assets like Conservation Areas and Listed Buildings
- Policy 38 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

3.7 The SA/SEA of the HDPF confirmed that its policies and proposed modifications prior to and following the Inspector's Initial Findings would result in no significant environmental effects that could not be satisfactorily mitigated. In due course, these policies will therefore provide the framework within which the SSWNP policies will be implemented.

3.8 The SSWNP contains a number of policy proposals within the South Downs National Park Authority area, in which case, the reasoning and evidence of the Authority's first Local Plan, which is currently at an early stage, has been taken into account. The West Sussex Minerals Local Plan adopted in 2003 and, given the extent of current and past minerals workings in the parishes, this has some bearing on how the SSWNP policies are framed. Whilst the SSWNP cannot contain policies that seek to manage that type of development, its policies should have regard to its effects on local minerals development policy. This is especially the case in relation to avoiding conflicts with safeguarded minerals deposits (Policy 2) and the reclamation of completed workings (Policy 20).

3.9 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. That plan will shortly be submitted for examination by its Parish Council, which has liaised with the parish councils here during the preparation of the respective plans. Its Plan contains a policy supporting the relocation and redevelopment of Thakeham Tiles, an old industrial site within the built up area boundary of Storrington & Sullington, for approximately 50 homes. It is known that the site owner/operator is keen to expand the business on a more suitable site in the local area and is exploring opportunities along the A24 corridor. The Plan is making no greenfield site allocations elsewhere on the boundary and the others plans, although at earlier stages of preparation, are not expected to make allocations on the edge of the parish either.

3.10 The vision of the Neighbourhood Plan is:

“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.”

3.11 The Neighbourhood Plan translates this vision into a series of strategic objectives and identifies key measures for each objective, as follows:

Housing

- To provide a mixture of housing types and in particular smaller private dwellings that are 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

3.12 The Core Strategy and HDPF provide a clear policy framework for securing sustainable development and the Neighbourhood Plan will be in general conformity with the provisions of that framework. It defines Storrington & Sullington as a Category 1 Settlement/Larger Village and Washington as a Category 2 Settlement in the settlement hierarchy, which the Neighbourhood Plan does not seek to challenge. It also establishes clear policies for the protection of the setting of the National Park and the surrounding countryside more generally, as well as the local heritage character.

3.13 The Neighbourhood Plan contains XX policies, which are summarised below:

- 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: Managing Housing Supply – providing for the delivery of the allocated housing sites over the full duration of the plan period
- Policy 4: Employment Uses – supporting economic development
- 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: Tourism Development at Chantry Quarry – supporting the development of a new tourist attraction
- Policy 9: Tourism Development at Sandgate Country Park – supporting the establishment of the Park and its visitor facilities
- Policy 10: Tourist Accommodation: supporting the provision of new tourism accommodation
- Policy 11: Broadband & Mobile Communications – supporting investment in local infrastructure to support economic development
- Policy 12: Education Uses – supporting the development of new and / or extended school facilities
- Policy 13: Community & Medical Facilities – supporting the retention and relocation of facilities
- Policy 14: Recreation Facilities – supporting the creation of a new

- skatepark
- Policy 15: Allotments – allocating a new site for allotments and/or community gardens
- Policy 16: Design – requiring development proposals to meet local design standards
- Policy 17: Green Infrastructure & Biodiversity – promoting improvements to local green infrastructure assets and protecting biodiversity
- Policy 18: Local Green Spaces – designating new spaces
- Policy 19: Air Quality – restating the importance of reducing current air quality problems in the Village Centre
- Policy 20: Traffic & Transport – supporting proposals that avoid making existing traffic congestion problems any worse
- Policy 21: Car Parking – establishing local parking standards

3.14 Taken together, the provisions of the Plan and the Core Strategy/Development Management DPD/HDPF will provide a comprehensive and complementary planning policy framework to determining the sustainability merits of future development proposals.

4. The relevant aspects of the current state of local social, environmental and economic issues and the likely evolution thereof without implementation of the Neighbourhood Plan

4.1 An important sustainability issue in the Parishes to which the Neighbourhood Plan responds is the scale of recent housing development schemes with planning consent or that have been completed in Storrington & Sullington in the last decade. Although as a larger village that benefits from the presence of key public services and of a viable and vital village commercial centre, this development has concerned local people in how it may change the character of the village and affect its infrastructure.

4.2 Important too is how future development proposals will impact on the existing traffic congestion through Storrington Village Centre specifically and along the A283 and A24 more generally through Washington Parish as well. Much of this problem relates to traffic being generated by and destined for locations well beyond the parishes and is often caused by traffic avoiding congestion on the A27 trunk road to the south. It is therefore accepted that the Neighbourhood Plan will not be able to directly address the underlying causes of congestion but it can draw attention to the matter and complement other development policies on managing air quality for example.

4.3 Further, the long term future location and type of employment provision in the area is uncertain. The village of Storrington & Sullington has had a range of industrial estates and businesses for many years. There are also some large businesses located along the A24. However, not all of this land is as well located as it may once have been, given the growth of residential areas over the last thirty years or more. In addition, some premises are the legacy of pre-land use planning system decisions and are of an age where wholesale replacement and redevelopment may be necessary by 2031. In both cases, the consequences are modern-day conflicts between these industrial uses, the amenities of adjoining residential areas, the impacts of traffic and the detrimental appearance of unsightly buildings on the scenic beauty of the National Park. This has led the Plan to consider a long term strategy of the gradual relocation of poorly located and/or redundant employment uses to better located sites in the parishes.

4.4 The Neighbourhood Plan therefore contains modest policies and proposals for development that are broadly consistent in scale and location with the strategic policies 2, 3, 4 and 14 of the HDPF. It makes provision for approximately 300 new homes primarily focused on Storrington & Sullington as well as new employment and tourism development. The location of Washington in the National Park has resulted in only a small number of proposed policies in that part of the area to ensure that its special landscape and scenic beauty are conserved.

4.5 Without the Neighbourhood Plan, proposals for housing development in the parish would be left to individual planning applications. This would make little difference to controlling the environmental impact of those proposals as they must in any event demonstrate they conform to development plan and

NPPF policy. Rather, the Neighbourhood Plan emphasis is on delivering a series of proposals that have positive social and economic outcomes within the environmental limits imposed by the Core Strategy, the HDPF and by the National Park.

4.6 However, the desire to rejuvenate the provision of employment land in the parishes does require the Plan to assemble a new spatial economic development plan and to justify the benefits of that Plan, in a way that an individual planning application may not be able to. Without the Plan, therefore, it is unlikely that its positive changes would come about, as the District Council would rightly be concerned that the loss of protected employment land would be compensated for elsewhere in this area.

5. The environmental characteristics of areas likely to be significantly affected

5.1 The National Park covers almost the southern half of the designated Neighbourhood Area – its boundary forms part of the southern extent of Storrington and it covers all of Washington village.

5.2 The SSWNP Area is located within 15km of a nature site of European importance, the Arun Valley SAC/SPA/Ramsar site beyond Pulborough some 8km to the west. The Habitat Regulations Assessment (HRA) of the HDPF indicated that development proposals in this part of the district may affect that nature site by way of undermining water quality and/or a disturbance to some bird species. Natural England has indicated that, given the scale, nature and distribution of development proposals supported by the Plan, an HRA of its policies may be required to be submitted with the Submission Neighbourhood Plan in due course. This will need to demonstrate that the proposals of the Plan will not cause any significant effects on that site.

5.3 There are Local Nature Reserves (LNR), Sites of Special Scientific Interest (SSSI – notably at Sullington Warren and at Chantry Mill), and Sites of Nature Conservation Importance (SNCI). These are identified and described in the Scoping Report in Appendix A. Priority Habitat areas have been identified by Natural England.

5.4 The Parish contains one Grade I, two Grade II* and a large number of Grade II listed buildings and structures. There are sixteen scheduled monuments in Storrington & Sullington Parish and none in Washington Parish. Both parishes have Conservation Areas, two in Storrington and Sullington and one in Washington.

5.5 The Neighbourhood Plan policies and proposals are almost entirely confined to the settlements of the Parishes. In addition, although the local community may regard the scale of development proposals of the Plan has considerable, they are not in relation to the existing building stock of the parishes, to the scale of housing development over the last decade or so, or to the strategic development provisions elsewhere in the district provided for by the HDPF.

5.6 It is therefore difficult to assess either the individual or cumulative effects of the Plan policies. Rather, the policies should avoid any obvious environmental harm in terms of the proximity of development proposals to the natural or heritage assets referred to above. Thereafter, the expectation is that planning applications in future will be screened for the need for Environmental Impact Assessment and other assessments (e.g. heritage) and they will be determined using the development management policies of the Plan and of other development plan documents. Should any proposals of the Plan not be consented in due course, as they cannot overcome over-riding environmental problems, then future reviews of the Plan will consider replacing them with new proposals. As the Plan does not have specific policy targets to reach, notably in housing development, then there will be urgency in identifying such replacement policies.

6. Any existing social, economic or environmental problems that are relevant to the Neighbourhood Plan

6.1 There are few existing social, economic or environmental problems that affect the neighbourhood area to which the Neighbourhood Plan is intending to respond. However, one of the three main considerations would be to ensure that the local housing need is met through a number of well-located site allocations in the larger settlements of the parishes.

6.2 The second consideration would be to ensure that any development in close proximity to Storrington village centre does not have further detrimental effect on the air quality in Storrington Air Quality Management Area. The third is that the consequences of economic change are managed positively, with the loss of any out-dated or poorly-located employment land compensated by positive policies to promote economic development.

7. The social, environmental and economic objectives that are relevant to the Neighbourhood Plan and the way those objectives and any considerations of sustainability have been taken into account during its preparation

7.1 The Neighbourhood Plan has been prepared to be in general conformity with the Core Strategy and to anticipate the emerging HDPF, both of which contain all the appropriate strategic policies to address social, economic and environmental issues across the district, including the Neighbourhood Plan area. The Neighbourhood Plan does not therefore seek to repeat them.

7.2 To assess the sustainability performance of the Neighbourhood Plan, the following assessment framework has been adopted. The proposed framework was consulted upon with the statutory consultees as part of the SA/SEA Scoping Report and it has been modified to take into account their comments. It is deliberately drawn from the SA/SEA Objectives of the HDPF so that, where possible and relevant, data sets can be shared for monitoring purposes (see Section 8).

Neighbourhood Plan SA/SEA Objectives	Neighbourhood Plan SA/SEA Measures
<p>1. Housing</p> <p>To provide high quality, affordable housing with a range of size, types and tenures appropriate to local needs</p>	<p>1A - Will the Plan improve the availability of decent, affordable housing? 1B - Will the Plan provide a range of housing types of various sizes and tenures? 1C - Will the Plan lead to the reuse of brownfield land for housing?</p>
<p>2. Community Facilities</p> <p>To ensure everyone has access to appropriate, affordable community facilities</p>	<p>2A - Will the Plan sustain or increase the provision of community facilities?</p>
<p>3. 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>3A - 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>4. Landscape</p> <p>To conserve and enhance the quality of landscape and townscape character in the District</p>	<p>4A - Will the Plan seek to protect and enhance the National Park and its setting? 4B - Will the Plan result in the deterioration of the quality of the landscape or villagescape?</p>
<p>5. Heritage</p> <p>To conserve and enhance the quality and distinctiveness of the historical environment of the parishes</p>	<p>5A - Will the Plan protect and enhance designated features of historical or cultural interest? 5B - Will the Plan sustain and enhance the settings and views of heritage assets?</p>
<p>6. Transport</p> <p>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</p>	<p>6A - Will the Plan reduce the need to travel by car by encouraging walking to shops and other facilities or services?</p>
<p>7. Economic Development</p> <p>To encourage vitality, vibrancy and overall stability within the local economy, including in rural areas</p>	<p>7A - Will the Plan support existing shops and businesses?</p>
<p>8. Flooding</p> <p>To minimise flood risk and promote the use of sustainable drainage systems</p>	<p>8A - Will the Plan avoid allocating development on land subject to flood risk?</p>
<p>9. Environmental Quality</p> <p>To ensure that the air quality does not deteriorate further</p>	<p>9A - Will the Plan make the existing air quality problems in the Storrington village centre worse as a result of additional traffic generated by its policies?</p>

Table A: Neighbourhood Plan SA/SEA Framework

7.3 In the consultation on the SA/SEA Scoping Report, the National Park Authority suggested an additional measure for Objective 8 assessing if the Neighbourhood Plan policies promote sustainable drainage for any proposed new development. However, this is not considered necessary as the NPPF and saved and forthcoming policies of the Horsham Development Plan already make such provision and the Neighbourhood Plan is seeking to avoid repetition.

7.4 In most cases, it is acknowledged data are not collected or reported at a parish level to enable an accurate assessment. In addition, the scale of development proposed in the Neighbourhood Plan is too small in comparison with the scale of existing development in the Parishes, making the identification of cause-and-effect relationships between inputs and outputs very uncertain.

7.5 However, the assessment does seek to identify the relative attributes of the policies of the Neighbourhood Plan to inform the reader.

Assessing the impact of the Neighbourhood Plan Strategic Objectives

7.6 The strategic objectives of the Neighbourhood Plan are outlined in para 3.3 above. They cover a range of economic, social and environmental issues in support of realising the communities' vision for the parishes. Each of these objectives is assessed against the SA/SEA objectives in Table B below. In all respects, the relationship between the Neighbourhood Plan objectives and the sustainability framework is generally neutral though there is the possibility of some positive impacts.

7.7 The Housing objective of the Plan aims to meet the need for local housing, especially for smaller homes suited to new homeowners and so relates positively to measures 1A and 1B. It also seeks to focus new development within or adjoining the settlement boundary and so relates positively to measures 1C, 4A, 4B and 6A in respect of reusing brownfield land, avoiding landscape harm and siting development closer to existing facilities.

7.8 The Employment objective relates positively to measures 7A and 9A in supporting local businesses and possibly in diverting some heavy goods vehicle traffic from within the village centre to the A24 corridor. The objective could have negative effects on measures 4A and 4B in respect of locating new businesses in that corridor, given the landscape character of that area. However, the expectation is that the policies of the Plan will ensure that this objective does not have such an impact.

7.9 The Landscape objective relates positively to measures 2A, 4A and 4B in respect of protecting valued community assets like open spaces and more generally in protecting and enhancing the National Park and its setting. There was the possibility that this objective may have had a negative effect on measure 1A but there is sufficient available and suitable land within and adjoining the settlements to ensure that local housing needs can be met.

7.10 The Village Centre objective relates positively to measures 2A, 6A and 7A in respect of protecting community assets and village shops so that the local community does not need to travel for many of its convenience retail and other local service needs. There is the possibility that the objective could have a negative effect on measures 5A and 5B in respect of harming the historic character of the village centre (i.e. the Conservation Area and Listed Buildings) but this will be avoided through the application of national, district and other Plan policies.

7.11 The Traffic objective relates positively to measures 6A, 7A and 9A in respect of sustaining the viability of the village centre to avoid increasing car trips to other centres and of improving air quality in the centre.

7.12 The Community Facilities objective relates positively to measure 2A in protecting valued community assets from unnecessary loss.

SA/SEA Objectives	Housing	Community Facilities	Biodiversity	Landscape	Heritage	Transport	Economic Development	Flooding	Environmental Quality
SSWNP Objectives:	1	2	3	4	5	6	7	8	9
Housing	Positive impact	No impact or some impact but mitigated	No impact or some impact but mitigated	Positive impact	No impact or some impact but mitigated	Positive impact	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated
Economic Development	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	Positive impact	No impact or some impact but mitigated	Positive impact
Landscape	No impact or some impact but mitigated	Positive impact	No impact or some impact but mitigated	Positive impact	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated
Village Centre	No impact or some impact but mitigated	Positive impact	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	Positive impact	Positive impact	No impact or some impact but mitigated	No impact or some impact but mitigated
Traffic	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	Positive impact	Positive impact	No impact or some impact but mitigated	Positive impact
Community Facilities	No impact or some impact but mitigated	Positive impact	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated	No impact or some impact but mitigated

Positive impact
No impact or some impact but mitigated
Negative impact

Table B: Summary Assessment of Objectives

Assessing the impact of the Neighbourhood Plan policies

7.13 The Neighbourhood Plan contains policies that may have social, environmental or economic effects. Using the sustainability framework of Table A, the assessment of each policy is summarised below in Tables C, D and E.

7.14 The spatial plan of Policy 1 is assessed as striking an appropriate balance between planning for housing and economic growth (measures 1A-C and 7A) and protecting the landscape and heritage character of the parishes (primarily measures 4A/B and 5A/B). In confining changes to the built up area boundaries in locations that are both suitable in planning terms and are acceptable to the local community, the policy protects the special character of the National Park (4A) and may enhance its setting, through the redevelopment of industrial sites like Chantry Lane and Lucking's Yard. It should also encourage development that is closer to the village centre and other services so will relate positively to measure 6A. However, it is possible that the policy will have negative effects on heritage value (measure 5A/B), given the clusters of listed buildings and the Conservation Area, and on air quality (measure 9A). Such heritage effects should be avoided through applying national and other plan policies to planning applications. The effects of traffic on the village centre are more the result of wider traffic movements than those generated from within the parishes.

	PROPOSED POLICIES	Housing	Community Facilities	Biodiversity	Landscape	Heritage	Transport	Economic Development	Flooding	Environmental Quality
	SA Objective	1	2	3	4	5	6	7	8	9
1	Spatial Plan									
2	Site Allocations	<i>See Table D</i>								

Table C: Summary Assessment of Proposed Policies 1 & 2

7.15 The nine housing site allocations of Policy 2 are all, by definition, sustainable locations for housing development as they all accord with Policy 1 of the Plan. A number of site allocations may have a number of positive or negative effects. In each case, the policy sets out a series of development principles to guide future planning applications in such a way to avoid or mitigate any negative effects and to accentuate any positive effects (see Table D for details). A fuller description of the characteristics and suitability

assessments of each site in Table D are contained in the separate Site Assessment Report in the evidence base. This work prioritised the list of forty assessed sites by their relative suitability for allocation in the Neighbourhood Plan, using criteria informed by, but not confined to, the measures of the agreed sustainability framework. Those assessed as the most suitable defined the extent to which the Built Up Area Boundary needed to be modified in Policy 1 and they comprise the proposed site allocations in Policy 2.

No.	Site Allocation	Avoidance/Mitigation Measures
i	Robell Way	The potential negative effect of the loss of employment land (7A) is mitigated by on-site provision of a new public open space and community facility (MUGA) and by other Plan policies promoting economic development in more suitable locations. The change in land use will also reduce a source of amenity problems - HGV traffic on local roads – for a positive amenity effect.
ii	The Vineyard	The potential negative effect of landscape impact (4A/B) is mitigated by the requirement for a landscape scheme that retains the existing mature vegetation on the site boundaries.
iii	Old Ryecroft Allotments	The potential negative effects of development on the setting to the Conservation Area (5A) and on the adjoining flood risk zone (8A) will be avoided/mitigated by a detailed scheme proposal having to have full regard to those matters.
iv	Amberley Road	The potential negative effect of development in the setting of the National Park (4A) will be avoided/mitigated by designating the lower part of the site a Local Green Space (in Policy 14) and a detailed scheme proposal having to have full regard to those matters. This will result in a smaller net developable area than originally envisaged (and therefore results in a smaller number of new homes, using the same average density of 25 dwellings per Ha as the adjoining residential area),

		which will better reflects its location within the setting of the National Park.
v	Chantry Lane	The potential negative effect of development in the setting of the National Park (4A), the adjoining SSSI (3A) and on heritage assets (5A/B) will be avoided/mitigated by redefining the policy boundary to exclude the SSSI area and by a detailed scheme proposal having to have full regard to those matters. The potential negative effect of the loss of some employment land (7A) is mitigated by on-site provision of new business space of at least an equivalent area. The redevelopment of the site should lead to a significant improvement in the appearance of the land in the setting to the National Park. Traffic effects on Chantry Lane should also be improved.
vi	Old Mill Drive	No specific sustainability measures effected.
vii	Post Office Depot	The potential negative effects of development on the Conservation Area (5A) and on the village centre (6A) will be avoided/mitigated by a detailed scheme proposal having to have full regard to those matters and by the requirement to retain a retail shop frontage.
viii	Ravenscroft	The potential negative effects of development on the setting to the National Park (4A) and on local amenity will be avoided/mitigated by a detailed scheme proposal having to have full regard to those matters. The loss of the allotments as a community facility (2A) will be mitigated by their prior re-provision.
ix	Luckings Yard	The potential negative effect of landscape impact (4A/B) is mitigated by the requirement for a landscape scheme that retains the existing mature vegetation on the site boundaries.

Table D: Summary Assessment of Proposed Policy 2 Allocations

7.16 Policy 3 is neutral in sustainability terms as its purpose is to ensure a balanced provision of new homes over the full plan period as land becomes available for development.

7.17 Policy 4 (Employment Uses) encourages economic development suited to a rural location (and which will cause less disruption to neighbouring residential areas than the present old sites in Storrington/Sullington). Although encouraging of proposals within the A24 Corridor, it also contains mitigation measures in respect of landscape impact (especially relating to the National Park, but also requiring only previously-developed land to be used) and effects on traffic, the combination of which should avoid a negative environmental effect.

7.18 For policies 5 - 10, not only are there likely to be positive economic impacts but the continuing vibrancy of the Village Centre and of local employment areas should reduce the need for local people to have to travel outside the parishes for employment or services as much as may otherwise be the case. Again, the policies include mitigation measures where there may be an issue with an unconstrained policy causing potential negative effects. These policies are assessed as being neutral though it is possible that without the full consideration of the proposed development principles and of other development plan matters when considering planning applications there may be some limited negative impacts.

7.19 The proposals for tourism development (policies 8, 9 and 10) provide a suitable framework for encouraging and managing tourism development. Policies 8 and 9 offer qualified support for proposals to reuse former and current minerals workings for tourism and community facilities. Given neither proposal is that well developed at present, the policy falls short of allocating the land for these purposes. However, it is known that both sites - Chantry Mill Quarry and the area forming the Sandgate Country Park - have a range of biodiversity value (most notably the Chantry Mill SSSI) as well as some potential landscape (National Park) and heritage (the Chantry Mill heritage asset) value. Though both proposals are intended to deliver strong economic (7A) and/or social benefits (2A), the policy qualifies its support for these proposals in such a way as to ensure planning applications satisfactorily address any potential conflicts with biodiversity (3A), the National Park setting (4A) and heritage (5B) policy objectives. As both proposals relate to the beneficial reuse of minerals workings, the policy acknowledges the requirements of those proposals to accord with approved restoration conditions and the wider policy provisions of the West Sussex Minerals Local Plan. In respect of Policy 10 supporting hotel development, this should also bring local economic benefits (7A) but again qualifies the support in respect of effects on the National Park (4A).

7.20 For the remaining policies, the effects are seen as either positive or neutral. The combination of policies 12-15 will have an especially positive effect on measure 2A in retaining and improving valued community facilities. Policies 16 and 17 are intended to have a particularly positive effect on

measures 4A/B and 5A/B by managing design quality and the provision of green infrastructure. Policies 19 and 20 together are aimed at reducing the negative effects of traffic in the villages, especially in Storrington village centre (measure 9A). Although the Plan can only operate at the margins in this respect, these policies will continue to draw attention to those problems.

7.21 Policy 18 will have a series of positive effects. It will protect open spaces enjoyed by the local community from development (measure 2A); some sites will have known local biodiversity value (3A); some will fall within the setting to the National Park, so will preserve its scenic beauty (4A); and some will form important spaces within the Conservation Area or its setting or that of a listed building (5A/B).

	PROPOSED POLICIES	Housing	Community Facilities	Biodiversity	Landscape	Heritage	Transport	Economic Development	Flooding	Environmental Quality
	SA/SEA Objectives	1	2	3	4	5	6	7	8	9
3	Managing Housing Supply									
4	Employment Uses									
5	Storrington Retail Area									
6	Storrington Village Centre									
7	Washington Village Centre									
8	Chantry Quarry									
9	Sandgate Country Park									
10	Tourist Accommodation									
11	Broadband									
12	Education									
13	Community & Medical Facilities									
14	Recreation Facilities									
15	Allotments									
16	Design									
17	Green Infrastructure/Biodiversity									
18	Local Green Spaces									
19	Air Quality									
20	Traffic & Transport									
21	Car Parking									

Table E: Summary Assessment of Proposed Policies 3 – 21

Assessing the impact of Reasonable Alternative Policies

7.22 The approach taken to identifying reasonable policy alternatives has been simple. In essence, is the alternative sufficiently distinct from that policy chosen to enable a meaningful comparison? Is it also distinct from an existing, higher order policy (at national or district level)? And would it be acceptable to the local community, based on the engagement work of the project and the knowledge of the planning history of some sites and issues?

7.23 The alternatives to the chosen spatial plan of Policy 1 do not assess as well against the SA/SEA objectives, though the differences are not too significant (see Table F below). Alternative Option A provides for housing development only within existing built up area boundaries of Storrington & Sullington and Washington. Alternative Option B assumes that all other assessed sites adjoining the built up area boundary of Storrington & Sullington and those near to Washington village (but not adjoining its boundaries) would be allocated in addition to those of the chosen option.

7.24 The Alternative Option A will likely provide less than half the number of new homes to meet local needs but is neutral in all other respects, as it will not have any significant environmental impacts. Arguably, this option would not be regarded by the District Council as being in conformity with the forthcoming HDPF, rendering the Plan out-of-date on the adoption of the HDPF. As such, it may not be considered as a 'reasonable' alternative.

7.25 The Alternative Option B is assessed as having a positive impact in terms of providing for more housing – perhaps up to another 100 homes - to meet local needs. Whilst such a quantum may not be considered significantly higher in technical terms, and this appraisal will not seek to exaggerate its consequences for effect, the parish councils have to balance this judgement with the acceptability of the Plan in the eyes of the local electorate. In technical terms, this option has some potential negative impacts, with incursions of the built up area into more sensitive landscapes or isolated development schemes well away from the main settlement centres. Such schemes may increase traffic movements to allow residents to access local shops and services and the larger scale of population growth may add further air quality problems in the Village Centre. However, the parish councils do not believe that a Plan based on such an option would successfully pass the referendum. Again, it is therefore arguable that this option is 'reasonable' for assessment purposes.

	ALTERNATIVE POLICY 1 OPTIONS	Housing	Community Facilities	Biodiversity	Landscape	Heritage	Transport	Economic Development	Flooding	Environmental Quality
	SA Objective	1	2	3	4	5	6	7	8	9
	Alternative Option A									
	Alternative Option B									

Table F: Summary Assessment of Alternative Policy 1

7.26 In respect of Policy 2, the sites chosen are only those that accord with Policy 1. By definition, therefore, the 31 sites assessed by the parish councils but not allocated did not meet the selection criteria for that policy and are not considered 'reasonable' alternatives for this purpose.

7.27 In respect of the other policies, the only reasonable alternative option to the chosen policy was for the plan to remain silent on that matter and to rely on national and/or other district-level policies for development management.

7.28 As already stated, the focus on the Plan policies on refining a relatively small number of district-level development plan policies means that the absence of a policy has little effect. In a small number of cases, it is possible that the loss of a policy may have a negative effect. For example, not having policies on tourism development (policies 8, 9 and 10) may lead to a missed opportunity to secure the long term community and economic benefits of the Chantry Quarry and Sandgate Country Park proposals, if the respective landowners and investors are not persuaded that the planning risks are low enough to act. The restoration conditions on the minerals workings ought to be sufficient to avoid any long term environmental harm.

7.29 Similarly, Policy 4 encourages economic development on previously-used land in the A24 corridor, an area within the National Park and in any event outside the main settlements of the parishes. The planning risks are high for landowners and investors in such locations so the absence of this policy may lead to a lower prospect of beneficial economic proposals coming forward.

7.30 However, in all these cases, the differences are marginal at best and in no case will the absence of a policy lead to a negative effect as there will be a continuing application of the NPPF and development plan policies to manage development proposals.

Assessing the impact of Cumulative Effects

7.31 Although each individual policy has been assessed as being unlikely to lead to any significant environmental effects, their cumulative effects should also be assessed, along with any known and relevant development proposals in the vicinity of the parishes.

7.32 The spatial plan of Policy 1 has resulted in no major allocations of land for development beyond the existing built up area boundary. The two largest sites are both in existing industrial use either within ('Paula Rosa') or adjoining ('Chantry Lane Industrial Estate') the existing boundary, though the boundary is being redrawn by the Plan policy. These and all the other sites where development is supported in policies 2, 4 and 8 are distributed around the edge of the main Storrington & Sullington village and, with few exceptions, avoid the National Park and its setting. Those same policies are closely related in that policies 2iii, 4 and 8 are intended to more than compensate for the loss of employment land in Policy 2i in terms of future job creation at higher site densities than at present. They may also compensate for the loss of the Thakeham Tiles site in the Thakeham Neighbourhood Plan, especially if that business is able to relocate to the A24 corridor.

7.33 The overall scale of development supported (and that by the Thakeham Neighbourhood Plan) represents a modest increase in the building stock and developed footprint of Storrington & Sullington. This may have a marginal effect on traffic movements through the village but it is hoped that the relocation and modernisation of some industrial sites may lead to fewer HGV movements in the village centre. However, the problems of traffic in the parish are not ones that the Plan can manage other than at the margins.

7.34 In summary, therefore, the assessment shows that in general terms the proposed Neighbourhood Plan policies, both individually and cumulatively, will have primarily neutral effects though some policies will have positive effects. There are no negative effects of the proposed policies.

8. A description of measures envisaged concerning monitoring

8.1 The Neighbourhood Plan proposes that the progress in its implementation will be assessed using the measures identified in Table A. The data for some of these measures are collected by the District Council in its planning monitoring reports. In other cases, the Parish Councils will endeavour to collect data on an annual basis to report on the progress of the plan.

APPENDIX A

Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)
SCOPING LETTER TO STATUTORY BODIES

Storrington, Sullington & Washington Neighbourhood Plan: Sustainability Appraisal/Strategic Environmental Assessment Scoping Letter

I set out below for your attention the proposed scope of the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) to accompany the forthcoming Storrington, Sullington & Washington Neighbourhood Plan (SSWNP).

This letter and its appendices should be regarded as the Scoping Report of the SSWNP in accordance with Stage A of the provisions of the Environmental Assessment of Plans & Programmes Regulations 2004 (which implement EU Directive 2001/42).

As a statutory consultee in the Regulations you are invited to comment on this report.

Background

The SSWNP is being prepared by the Storrington & Sullington Parish Council and Washington Parish Council as qualifying bodies under the 2012 Neighbourhood Planning (General) Regulations. In accordance with the 2004 Regulations 2004, the local planning authority, Horsham District Council, issued its formal screening opinion on 20 May 2014, concluding that an SEA is required and that it would prefer this is undertaken as part of a wider Sustainability Appraisal (SA/SEA).

In its decision, the District Council has not made its reasons explicit for reaching this conclusion, but it is understood that the likely intention of the SSWNP to contain policies allocating land for development is the primary reason. A third of the designated area lies within the South Downs National Park and there are no European sites within the area, although the area does lie within the 15km buffer zone of the Arun Valley SAC/SPA/Ramsar site. A Habitat Regulations Assessment may also therefore be necessary in due course.

The guidance for undertaking SA/SEA is contained in the Planning Practice Guidance (ID 11-030), which emphasises that it must “only focus on what is needed to assess the likely significant effects of the neighbourhood plan” and on the “environmental impacts that are likely to be significant”. It states that this “does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan”.

It is therefore important to establish that the SSWNP is likely to contain policies that will seek to identify smaller sites for housing development and that will seek to shape the design of new development. Its focus will be on identifying land, especially brownfield land, for housing, retail, employment and community facilities primarily within its main settlements of Storrington and Sullington. It will therefore work alongside other development plan policies for the district to guide the consideration of planning applications.

The SA/SEA framework will be used to assess two or three spatial options for distributing this development in the parishes, rather than to assess individual sites in isolation of each other. Its conclusions will direct the selection of sites to those locations assessed as the most suitable by taking account of the SA/SEA and the Parish Councils' view on the relative acceptability to the local community of the spatial options, bearing in mind the need for the SSWNP to win a majority vote at a referendum in due course. The consideration of these potential policies has begun but will await the conclusions of the consultation on this scoping exercise before progressing any further.

The SSWNP 'State of the Parishes' report was published by the Parish Councils in July 2014 to summarise the relevant evidence base for preparing the plan. This is attached as Appendix A to this letter. The report contains a summary analysis of the relevant plans and programmes of others that may inform the SSWNP and provides an overview of its evidence base. In doing so, it provides the information required for Stages A1 and A2 of the SA/SEA process.

Outlined briefly below is additional information required of Stages A3 and A4, together with some additional baseline data for Stage A2 attached as Appendix B.

Other Plans & Programmes (Stage A1)

The SSWNP State of the Parishes report identifies the policies of the documents that make up the adopted 2007 Horsham Local Development Framework as having the most likely relevance in shaping the SSWNP. Indeed, the SSWNP must be able to show that its policies are in general conformity with the strategic policies of the development plan (essentially the Core Strategy).

However, the report notes too that the replacement of the 2007 policies is well underway and the consultation on the Proposed Submission version of the Horsham District Planning Framework (HDPF) ended in June 2014. Given it is therefore likely the SSWNP will be examined before the adoption of the HDPF, the SSWNP can only benefit from the reasoning and evidence of the HDPF (including its SA/SEA and Habitats Regulations Assessment). The SSWNP policies cannot yet rely upon the proposed HDPF policies to justify its policies.

The report also notes that parts of the parishes of Storrington & Sullington and the Washington lie within the South Downs National Park and so cites the key objectives of the Management Plan an anticipation of the Park Authority's emerging Local Plan, and again summarises its key objectives.

Baseline Information (A2)

The State of the Parishes report contains a wide range of social, economic and environmental data. However, for the purpose of the SA/SEA, some more detailed data has been identified (see Appendix B) in relation to the proposed assessment framework (set out in A4 below). The parish councils are mindful that it is very difficult in most cases to measure impacts at this local scale as either the data is not reported at this scale and/or the impact is so relatively negligible that it can not be measured. In which case, the SA/SEA framework will be used to inform judgements on the impact of the proposed policies in relation to any reasonable alternatives there may be.

Sustainability Issues (A3)

The State of the Parishes report highlighted no significant sustainability issues that are not also common to rural England. Outside of the National Park, which has a clear higher policy status, the remaining parish also has a high quality of landscape and built heritage and character. Storrington in particular benefits from a range of local services – shops, schools etc. but most are located in its village centre, which is a designated Air Quality Management Area. There has been considerable housing development in the area over the last decade, which, together with the A283 being used as an alternative to the congested A27 to the south, has increased air quality problems in the centre. Elsewhere in the area, the demand for affordable housing (and for smaller open market housing for downsizing) is greater than local supply.

The local community accepts that some new development may be required to continue to meet the need for housing but this must focus on making better use of brownfield land within the settlements and must seek to at least avoid making traffic and air quality problems any worse. In any event, housing should be small in scale, well located and be of a high quality design.

As a result of the community engagement work completed thus far, a summary of which is also contained in the State of the Parishes report, the SSWNP will plan for a modest number of new homes over the plan period 2015 – 2031 in relation to the current number of dwellings in the parishes. At this stage, from the evidence work already undertaken, the Parish Councils are confident the SSWNP will be able to meet this objective within the environmental constraints.

As the focus of the policies is likely to be on the main settlements of Storrington and Sullington, the SSWNP is not likely to address issues in the National Park. It will, however, be mindful of the close proximity of the National Park boundary to those settlements.

Appraisal Framework (A4)

In the light of the context and available data, the Parish Councils proposes to establish the following framework of environmental, social and economic objectives and measures in order to identify any likely significant environmental, social and economic effects.

The proposed framework reflects the general sustainability issues of the parishes and the likely scope of policies in the SSWNP, which will focus on making smaller housing site allocations. It has selected those objectives of the SA/SEA accompanying the HDPF that are considered the most relevant and informative for this purpose. The decision not to choose an HDPF SA/SEA does not necessarily mean that objective has no relevance to the SSWNP but that it is unlikely to enable the merits of policy options to be distinguished and is therefore unhelpful for this purpose.

The process of housing site selection will be informed by an analysis of their achievability, availability and acceptability and by an analysis of their suitability when assessed against the spatial policy of the SSWNP. That spatial policy, and any reasonable alternative spatial options, will be informed by the proposed SA/SEA framework.

The list of objectives and measures below indicates which of the HDPF SA/SEA objectives have been used to inform them.

Objective 1: Housing (HDPF SA/SEA 'Housing')

To provide high quality, affordable housing with a range of size, types and tenures appropriate to local needs:

1A - Will the SSWNP improve the availability of decent, affordable housing?

1B – Will the SSWNP provide a range of housing types of various sizes and tenures?

1C – Will the SSWNP lead to the reuse of brownfield land for housing?

Objective 2: Community Facilities ('Leisure & Recreation' & 'Equalities & Social Inclusion')

To ensure everyone has access to appropriate, affordable community facilities:

2A - Will the SSWNP sustain or increase the provision of community facilities?

Objective 3: Biodiversity ('Biodiversity')

To protect and enhance the quality and level of biodiversity and natural habitats within the parishes and provide new green infrastructure.

3A - Will the SSWNP lead to a loss to biodiversity, flora or fauna as a result of development either directly or through habitat fragmentation?

Objective 4: Landscape ('Landscape')

To conserve and enhance the quality of landscape and townscape character in the District:

4A - Will the SSWNP seek to protect and enhance the National Park and its setting?

4B - Will the SSWNP result in the deterioration of the quality of the landscape or villagescape?

Objective 5: Heritage ('Archaeology & Cultural Heritage')

To conserve and enhance the quality and distinctiveness of the historical environment of the parishes:

5A - Will the SSWNP protect and enhance designated features of historical or cultural interest?

5B – Will the SSWNP sustain and enhance the settings and views of heritage assets?

Objective 6: Transport ('Transport')

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:

6A - Will the SSWNP reduce the need to travel by car by encouraging walking to shops and other facilities or services?

Objective 7: Economic Development ('Economy' & 'Retail')

To encourage vitality, vibrancy and overall stability within the local economy, including in rural areas:

7A - Will the SSWNP support existing shops and businesses?

Objective 8: Flooding ('Flooding & Drainage')

To minimise flood risk and promote the use of sustainable drainage systems:

8A - Will the SSWNP avoid allocating development on land subject to flood risk?

Objective 9: Environmental Quality ('Soil, Air and Water')

To ensure that the air quality does not deteriorate further.

9A – Will the SSWNP make the existing air quality problems in the Storrington village centre worse as a result of additional traffic generated by its policies?

Statutory Consultation (A5)

The conclusions of this consultation will be considered by the Parish Councils in finalising the SA/SEA assessment framework. That framework will then inform the formulation of the Pre Submission SSWNP and will be set out and employed in the accompanying Draft SA/SEA report. It is expected that draft SSWNP policies will be formulated and assessed against one or more reasonable alternatives to ensure any significant environmental effects have been identified and any necessary mitigation measures are included in the policies.

If you have any queries then please contact our planning consultant, Neil Homer, of RCOH Ltd at neil.homer@rcoh.co.uk or call him on 07833 462991.

We look forward to hearing from you.

Yours sincerely,

SSPC and WPC

APPENDIX A

Storrington, Sullington & Washington Neighbourhood Plan: State of the Parishes Report

See separate document

APPENDIX B

Storrington, Sullington & Washington Neighbourhood Plan: Environmental, Social and Economic Baseline Data

Historic Landscape

Title	Source	Data	Trends and consequences
South Downs National Park		The South Downs National Park lies broadly to the south of the settlements and is partly within the SSWNP boundary.	One of the SSWNP criteria for allocating sites for development is for development to avoid the South Downs National Park and its setting, unless an exceptional case can be made.
Settlement Hierarchy	HDPF	The settlement of Storrington & Sullington has been designated as a Category 1 Settlement in the Core Strategy 2007 policy CP5 (and as a 'Larger Village' in new HDPF Policy 3. The settlement of Washington was identified as a Category 2 Settlement in the same policy from the Core Strategy 2007. It now lies within the South Downs National Park. The Settlement Hierarchy Study of 2013 identified the village as a 'Tier 4' settlement, the equivalent of a smaller village with few services.	Storrington and Sullington have consolidated their role in the hierarchy with new developments over the last few years. The role of Washington has not changed.
Listed Buildings and Conservation Areas	www.heritagegateway.org.uk & http://www.horsham.gov.uk/environment/11000.aspx	Storrington & Sullington <ul style="list-style-type: none"> • 1 no. (all grade I), • 58 no. (all grade II) • Scheduled Ancient Monuments 16 no. • 1 no. (all grade II*) • The Parham Park Washington <ul style="list-style-type: none"> • 39 no. (all grade II) 	The SSWNP area has a large number of listed buildings, Scheduled Ancient Monuments the Parham Park and therefore need to ensure that any new development is sensitive to the character of the areas in which they are located.

Title	Source	Data	Trends and consequences
		<ul style="list-style-type: none"> • 1 no. (all grade II*) <p>The SSWNP area has three conservation areas covering the village centre and environs of Storrington, Sullington Manor and the village of Washington. There are no Conservation Area Appraisals as yet.</p> <p>The scheduled monument of;</p> <ul style="list-style-type: none"> • xxxx <p>The monument types are;</p> <ul style="list-style-type: none"> • xxxxxx 	

Biodiversity & Environmental Conservation

Title	Source	Data		Trends and consequences
Sites of biological interest	Sussex Biodiversity Centre and Horsham District Planning Framework Sustainability Appraisal	<p>The following Sites of Special Scientific Interest exist within Storrington & Sullington Parish:</p> <ul style="list-style-type: none"> • Amberley Mount to Sullington SSSI (part) • Chantry Mill SSSI • Parham Park SSSI (part) • Hurston Warren SSSI • Sullington Warren SSSI <ul style="list-style-type: none"> • No Areas of Outstanding Natural Beauty exist within the Parish • No Local Nature Reserves exist within the Parish • The southern half of the Parish falls into the South Downs Environmentally Sensitive Area. • The South Downs National Park covers both the lower half of the Parish together with a small portion of the north western edge. 	<p>The following Sites of Special Scientific Interest exist within Washington Parish:</p> <ul style="list-style-type: none"> • Chanctonbury Hill SSSI • No Areas of Outstanding Natural Beauty exist within the Parish • No Local Nature Reserves exist within the Parish • The southern half of the Parish falls into the South Downs Environmentally Sensitive Area. • The South Downs National Park covers the southern two thirds (approximately) of the Parish. 	The SSWNP area is within the protection zone of the Arun Valley SPA/Ramsar site of European importance and there are many Sites of Special Scientific Interest

<p>Habitats identified around the SSWNP area</p>	<p>Storrington, Sullington and Washington Neighbourhood Plan</p>	<p>The Storrington & Sullington Parish contains areas identified by Natural England as Priority Habitats and are subject to Habitat Action Plans:</p> <ul style="list-style-type: none"> • Underdetermined Grassland Priority Habitat – between Kithurst Hill and Coldharbour, between Kithurst Hill and Sullington Hill and Barnsfarm Hill and Barns Farm in the south of the Parish. 2 areas around Storrington village and in the north of the Parish around Hurston Warren and the West Sussex Golf Course. • Lowland Calcareous Grassland Habitat - between Greyfriars Farm and Sullington Hill and to the north west of Barnsfarm Hill. • Lowland Heathland Priority Habitat – concentrated around Sullington Warren, Hurston Place and Hurston Warren. • Traditional Orchard Priority Habitat – 4 areas, one adjacent to the allotment gardens, one to the north of Sullington Warren Farm, one adjacent to Poultry Farm and one adjacent to Hurston Place Farm. • Deciduous Woodland Priority Habitat – pockets dotted across the entire Parish area, but with concentrations heading directly west from the Chantry. • Woodpasture and Parkland Priority Habitat – concentrated on and to the east of Sullington Warren, south of Fryern Home Farm and along the western edge of Hurston Warren. • Four areas of Entry Level Stewardship Scheme around Barnsfarm Hill in the south east of the Parish, adjacent to Gerston Farm, to the north of Oaklands Farm and around Winterfield Farm in the north of the Parish. • Multiple areas of Entry Level plus High Level Stewardship Schemes cover the majority of the southern portion of the Parish. • Two areas of Higher level Stewardship Scheme covering Sullington Warren and Hurston Warren. • Areas of Organic Entry Level Stewardship Scheme, immediately adjacent to Hurston Street Farm and Tickletag Farm. • A small pocket of land is in Woodland Grant Scheme 3 located around Sullington Warren, as are two other pockets to the East and West of the Chantry and one to the east of Lower Hurston Barn. <p>The Parish contains areas identified by Natural England as Priority Habitats and are subject to Habitat Action Plans:</p> <ul style="list-style-type: none"> • Underdetermined Grassland Priority Habitat – primarily concentrated around Green Barn Farm, but with areas either side of the South Downs Way close to Chanctonbury Hill. • Lowland Calcareous Grassland Priority Habitat – concentrated either side of the South Downs Way close to Chanctonbury Hill. • Lowland Heathland Priority Habitat – a small area at the western edge of Washington Common. • Traditional Orchard Priority Habitat – 8 locations, primarily concentrated between Goodyers Farm and Spring Garden Nurseries. • Deciduous Woodland Priority Habitat – This covers numerous parts of the Parish, but is largely concentrated between Owls Croft and Highden Hill in the south of the Parish, around The Square in the south west of the Parish and across Washington Common and Heath Common in the north of the Parish. <p>Storrington Sullington & Washington Neighbourhood Plan Stewardship Schemes started in the south east of the Parish, to the west of Home Farm Cottages, north and south of East Clayton Farm and the area around Upper Chancton Farm in the north east corner of the Parish.</p> <ul style="list-style-type: none"> • Entry Level Stewardship Schemes – In the areas around Highder House and Rowdell Holt East in the south of the Parish, around Tilleyde Farm to the East of 	
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Climate Change

Title	Source	Data	Trends and consequences
Water Courses and flood risk	Horsham District Council Strategic Flood Risk Assessment: Revised Final Report (2010) and Environment Agency	The Parish of Storrington & Sullington has functional floodplains along the flood zones 2 and 3 and some groundwater flooding in the area. Washington does not have any flood risk zones in and around the settlement, however there is some flood zone 2 to the north of the parish. Washington has been identified as being within the groundwater emergence zone.	Development proposed through the Neighbourhood Plan should avoid flood areas 2 or 3 in accordance with Environment Agency requirements.

Flood Risk Map

Showing flood planes and water course



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Surfacewater flood risk map – SSWP Area



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River and Sea water flood risk map flood - SSWNP Area

Title	Source	Data	Trends and consequences
Ground Water flooding		Washington has been identified as being within the groundwater emergence zone and Storrington and Sullington has some groundwater and surface water flooding in the area.	New development in areas particularly susceptible to ground water flooding will need to effectively demonstrate they can mitigate the risk of flooding without having adverse affects on surrounding areas.

<p>Air Quality</p>	<p>Horsham District Council – Storrington Air Quality Management Area</p>	<p>Storrington village has been identified as having an Air Quality Management Area (AQMA), this is due to the excess of nitrogen dioxide (NO2) caused by road traffic. According to Horsham District Council's website, a 12 month Low Emission Zone (LEZ) trial started in May 2014 in Storrington. This was commissioned by the Horsham District Council in partnership with WSCC, Storrington & Sullington Parish Council and the Sussex Air Quality Partnership. The purpose of the trial is to test whether a Low Emission Zone would be an effective way in reducing the air pollution in Storrington.</p>	<p>New development in the SSWNP area that may generate traffic that may exacerbate the current problems. A challenge for the SSWNP will be to assess which spatial options, if any, may reduce this risk.</p>
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