

NP Paragraph No/ Policy No.	Suggested Change / Comment	Reason for comment
General Comments	<p>In terms of the presentation of the policies, it is considered that it is unclear which the policy wording is and what is supporting text, as each policy area is set out in a single box. It is presumed text in bold is policy and text not in bold is considered supporting text. This approach is not applied consistently and there are instances where some of the text that is not in bold could be interpreted as part of the policy (criterion) while other text can be construed as supporting guidance or a statement. The document should be updated to ensure that the distinction between policy from supporting text is clear.</p> <p>In addition it is requested that policy criteria are numbered rather than using bullet points. This greatly assists planning officers when writing committee reports on specific planning applications, where they need to make reference to specific policies / sub-sections of policies.</p>	Clarification. In addition there are legal consequences especially for appeals as significant weight is applied to policy and supporting text tends to have lesser weight.
Policies Map	The policies maps are considered too small to be legible and are not at a scale where boundaries can be clearly defined. The legend on each map is also unclear at times. The Policies map should show all proposed designations (allocations, strategic gap, Local Green Space, BUBA amendments) in one place with an appropriate legend and at a resolution which is legible with boundaries which are clearly defined.	To enable clear and unambiguous identification of policy designations.
Pg 12, 3.2 History	The Plan stipulates that there are “no fewer than 69 listed buildings”. It is questioned whether this figure includes individual buildings or whether some are group listings. It would be helpful to make this clarification.	For clarification
Pg 16 3.6 Streetlighting	It is suggested that this should read character instead of <i>setting</i> of the parish at the end of the paragraph.	For clarification
Allocation of Land for Housing (Policy H1)	Further evidence is required to demonstrate the emerging neighbourhood plan has a robust housing figure which contributes positively towards meeting a fair proportion of the 1500 dwellings as stipulated by Policy 15 of the HDPF. The plan must demonstrate all sites have been assessed objectively in order to meet this requirement.	As drafted the policy does not meet the basic conditions.

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	<p>HDC considers the Housing Needs Survey (2014) does not reflect the wider needs of the community. The Housing Needs Survey (2014) is limited in scope, concentrating solely on the delivery of affordable housing. There is no assessment of other tenures of housing or meeting market signals in order to meet PPG requirements. The AirS study is also a snapshot in time which does not cover the whole plan period up to 2031. This does not meet the basic conditions.</p> <p>It will be necessary for the West Chiltoningon Neighbourhood Plan to provide evidence to support a viable, robust housing number which seeks to accommodate a fair proportion of the total of 1500 dwellings to be delivered through Neighbourhood Planning as set out in Policy 15 of the HDPF. It will be necessary for the Parish Council/Steering Group to undertake a Housing Needs Assessment to ascertain a robust housing number. Every endeavour must be made to accommodate this housing number with the sites available.</p> <p>Consequently all sites that have been suggested to the Steering group as a potential development site must be assessed objectively in order to meet this requirement.</p> <p>Assessment of sites must be supported by robust evidence either through communication with statutory consultees or technical evidence. (Please refer to the additional commentary in the Site Allocation Assessment section below). It should however be noted that public opinion from the local community cannot be the sole justification to reject a site. A developer may seek to challenge the plan if they can provide adequate mitigation against a negative impact whether it is a highways or a landscape/environmental issue.</p> <p>In addition, there is a lack of detail on the allocated sites identified in the plan as how they should be brought forward (access arrangements, overcoming landownership or availability issues, contamination, any mitigation required, any developer contributions sought). This is a significant omission and could lead to development coming forward which is very different to that which the community may have envisaged.</p>	

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Site Allocations Assessments	<p>As set out above, the assessment of all sites must be supported by robust evidence. Whilst it is noted that the Parish has undertaken this process, the Council is concerned that the work that has been undertaken to date is insufficiently robust to meet the basic conditions. For example limited information is available on proximity to existing services and facilities, the proximity to nature conservation designations on a consistent basis. The Council has distributed guidance on the site assessment process following the Neighbourhood Planning Conference held in January 2017, and it is strongly recommended that this approach is followed. We are happy to discuss this process with you in more detail. The site assessment report will also need to provide more detail than is currently available on the alternative sites than is currently available. In particular the Parish should look further at the Haglands site. It is stated that this site is not currently available. However, there has been a recent appeal decision on this site which suggests otherwise. In the appeal, outline permission was sought for 19 dwellings (DC/15/1389). This was dismissed on the principle of development and landscape impact but there may be ways in which this could be mitigated. In addition to these general remarks, we also set out some further detailed commentary on the specific sites below:</p> <p>Site 1 Land east of Hatches House</p> <p>Reference is made to the land at Hatches Estate in the Site Assessment Report. This is identified in the 2016 SHLAA as land currently developable within 6-10 years. The site abuts the boundary of the existing settlement and is controlled by WSCC who have expressed an interest in developing this site. The adjacent Grade II listed building (Naldrett) is not referred to in the assessment. The plan states that residents were largely unhappy with this site for development due to poor access and the impact of additional traffic on local roads / lanes It is felt that further consideration should be given to this site. It could however be the case that the site could be accessed appropriately following discussion with the highways authority. Whilst it is noted that the scheme may result in a significant landscape impact if not appropriately designed this could potentially be overcome. At this stage it is considered further work is required as to the suitability of this site. The current rejection based on local opinion conjecture alone cannot be supported.</p>	Further work is required on site assessments.

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	<p>Site 2 Steele Close</p> <p>Strong justification will be required to justify the allocation of this site given that it already has planning permission – it could perhaps address what could come forward if the permission is not implemented. The site is already be included in the Council’s housing trajectory and will not count towards the contribution of 1500 homes through neighbourhood planning. The site assessment does not make reference should be made to the planning application reference for this site which should be included (DC/15/2810) which allowed 14 affordable homes and one market unit. No reference is made in the site assessment to the impact on the nearby listed building.</p> <p>Site 4 - Juggs Lane</p> <p>It is unclear on the extent of land being offered for consideration. A red line around the proposed land is required. Has the landowner demonstrate access arrangements? What grade is the agricultural land? The conclusion is unclear regarding availability (the assumption is the land has been offered for consideration).</p> <p>Site 5 - Crossway</p> <p>It is unclear why this site was considered when the conclusion indicated the site is not available for development. If this is not the case, further detail required regarding the existing building i.e. is it considered a non-designated heritage asset?</p> <p>Site 6 Old Boundary Lane</p> <p>More work is required to justify why this site is unsuitable. It is noted reference is made to Character Area 53 (Local Landscape Character Area) and while there is no no/low capacity for large scale development (100 dwellings proposed) the landscape may be able to accommodate more modest development. This is not clear in the report. The Landscape Capacity Assessment is a high level document, and smaller</p>	

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	<p>areas within the overall character zones must be assessed on own its merits. Reference should be made to archaeological notification area located on the south west boundary of the site.</p> <p>Site 17 Johnsons Farm</p> <p>The site should be assessed against Policy 27 of the HDPF in terms of coalescence. While there are mature trees onsite they are not TPOs and there is possible mitigation which can overcome this. It is not clear from the map the extent of the traditional orchard and what if any implications this has.</p> <p>Site 29 West Chilton Road</p> <p>Reference should be made to the adjacent Grade II listed building and what impact this may have on the potential development.</p> <p>Site 34 Chilton</p> <p>If this site is considered a windfall it should be screened out from the process and not considered as an allocation.</p> <p>Site 38 Moto Di Marino Garage</p> <p>Moto Di Marino garage site, the Site Assessment Report stipulates the site maybe suitable for 16 one and two bed flats for the elderly. Reference should be made as to how the site would be secured for the elderly. The delivery of the site is uncertain and further commitment from the landowner is required for it to be allocated in the plan.</p>	

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Quality of Design (Policy H2)	<p>The village design statement is dated 2003 (pre – NPPF 2011) and adopted under the previous Planning Act as Supplementary Planning Guidance (SPG). The validity of the document may be challenged because of its date and may negate its effectiveness when referenced to in Planning Policy. The document should be updated to reflect new legislation. Reference could be made in the plan to the intention to undertake such a review and ensure that any future documentation be considered.</p>	To meet the basic conditions
Housing Mix (Policy H3)	<p>As part of the government’s housing and construction 'Red Tape Challenge' (2012), Lifetime Homes has move to consolidated standards into a national framework centred on the Building Regulations. Lifetime Homes is optional in the building regulations at the moment. Please refer to the Housing Standards Review. The policy should therefore make it clear that 25% of the optional accessibility standards as stipulated in Part M of the Building Regulations is supported but is not mandatory.</p> <p>In addition Planning Practice Guidance (paragraph 009) states that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The Category 3 optional standard M4(3)(2)(b) may therefore only apply to social rented and affordable rented homes. The Category 2 optional standard M4(2) and Category 3 optional standard M4(3)(2)(a) can be applied irrespective of tenure because they relate to wheelchair adaptable dwellings.</p> <p>The Council has recently produced a housing mix study which stipulates there is shortage of 2/3 bedrooms in the district. The parish may wish to consider whether they wish to use this evidence to help support this policy in terms of the types of housing which are provided.</p>	To ensure conformity with regulatory requirements
Housing Density (Policy H4)	<p>Clarification is sought on the latter part of Policy H4 as it does not related to the first half of the policy. The Council considers an applicant can provide contributions for infrastructure to make development acceptable in planning terms thus negating the latter part of the policy. Please delete.</p> <p>‘And not overloading local services/infrastructure...’</p>	Clarification.

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Affordable Housing (Policy H5)	Affordable Housing Policy should be in line with HDPF Policy 16. Please amend the policy to reflect this. The reference to the Horsham DC Housing Strategy 2013-2015 is out of date. Please also refer to our earlier comments on the need for housing need assessments.	To meet the basic conditions.
Windfall Sites (Policy H6)	It is noted that Policy H6 does stipulate if impacts from development can be mitigated through contributions.	n/a
Outdoor Space (Policy H7)	Outdoor Space Policy H7 - suggestion to replace 'adequate' with 'appropriate'. It is suggested that this policy is merged with H8 as a general development principals or design criteria policy, which will assist Development management officers in using the plan once it is made.	For clarification
Attention to Detail (Policy H8)	<p>A number of these requirements may not be possible as they are covered by permitted development rights. The effectiveness of the policy may be limited. It is suggested that areas over which there is no direct control are set out in a community aims section at the end of the document.</p> <p>Please note previous comment (Policy H2) regarding the Village Design Statement and conformity with current legislation.</p> <p>There is no dark skies policies in the HDPF nor at national level. The SDNPA has a dark sky policy but this is credited by International Dark Skies Reserve (IDSR) and is one of two areas afforded this designation in the UK. While some of the SDNPA does encroach into the parish at the south west boundary there is not the blanket dark skies designation across the Parish. Further evidence would be required to require this for all sites outside the national park. It may also be helpful to merge this section of the policy with EH9.</p>	For clarity, ease of use and conformity with National Planning Policy/Local Plan and existing legislation.
Built Up Area Boundary (Policy EH1)	As worded this policy is not in conformity with policy 26 of the HDPF, and is more restrictive than the HDPF policy. As worded the policy should be deleted as it would be covered by the provisions in the HDPF	To meet the basic conditions.
Settle Separation Zone (Policy EH2)	The need for a settlement separation zone will need to be supported by background evidence to justify the need for this policy in addition to policy 27 of the HDPF. The statement 'or where the benefits outweigh the harm' is potentially ambiguous and it is suggested the identification of specific criteria would be more helpful.	To demonstrate conformity with the basic conditions.

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Green Infrastructure and Ecosystem Services (Policy EH3)	At the current time this policy is not locally specific - it would be helpful to identify key areas of green infrastructure in the parish that should be protected or enhanced in addition to biodiversity corridors.	TO ensure all areas of green infrastructure that are important in the parish are identified.
Surface Water Management (Policy EH4)	No further comment.	n/a
Renewable and Low Carbon Energy (Policy EH6)	Please remove reference to Micro-Generation Certification Scheme from actual policy as it is not related to land use planning. It is recommend reference is made of Micro-Generation Certificate Scheme in the supporting text.	To strengthen the policy and to be in conformity with the basic conditions.
Non-Designated Heritage Assets (Policy EH7)	No further action required. Noted the comment regarding Article 4.	n/a
Conservation Area (Policy EH8)	The Policy should read ‘preserve <u>or</u> enhance. Please delete ‘preserve and enhance’	To strengthen the policy.
Unlit Village Status (Policy EH9)	<p>Please see comment Policy H8. While Paragraph 125 of the NPPF goes on to stipulate:</p> <p><i>“By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”</i></p> <p>There is no requirement here for dark skies without the support of evidence and it may be open to challenge. In addition there is no further stipulation of what is required in terms of what is acceptable illumination? Further guidance would help the policy and how this may be applied. From public (streetlighting) to domestic lighting to consideration of different areas of the parish (village centre/edge of village/rural/commercial) and consideration of safety issues. It is accepted SDNPA does encroach into the Parish (South West boundary of the parish) but the dark skies policy in the SDNPA Local Plan does not include blanket coverage of the whole</p>	Clarification is required.

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	parish. What is needed is to demonstrate such a policy can be applied successful with more detailed required. Are there different zones which are more sensitive? What level of lighting would be acceptable? While it is accepted the Parish may want unlit skies it would benefit the policy if further clarification is provided on what is acceptable and where.	
Wells Houses (Policy EH10)	Wells Houses do not carry any formal heritage designation or additional protection above normal planning legislation and while the buildings are distinctive, further evidence is required to make the policy effective from any potential challenge. It is noted there is mention of limiting PD rights to this group of houses but again there is the requirement to collate evidence in order for the removal of PD rights in distinctive areas.	Evidence required to support the policy.
Sunken Lanes and Stream Lane (Policy EH11)	Map C is missing from the main body of the plan. Further evidence must be presented on how such features are valued and contribute to the character of the area. Background evidence is required. In addition, it is considered that further consultation will need to be undertaken on this map before progressing to submission , as at the current time the location of these lanes are not formally identified and does not enable consultees to meaningfully set out their views on the impact of this policy.	To aid the examiner and support the policy. To meet the basic conditions.
Mineral and Hyrdo-Carbon Extraction (Policy EH12)	This is considered to be a minerals issues and in the control of WSCC and not within the scope of the Neighbourhood Planning. West Sussex Mineral Plan is only mentioned in the justification and not in the main body of the text.	This policy does not meet the basic conditions and should be deleted.
Significant Views (Policy EH13)	Map F: It would have been useful to have photographs relating to each significant view to demonstrate its value to the Examiner. Each view should be numbered and it is assumed that each significant view is taken from a public vantage point. This should be placed in a background evidence document to support the plan.	To aid the examiner.
Promoting Sustainable Movement (Policy GA1)	No further comment.	n/a

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Footpath, bridleways, and cyclepath network (Policy GA2)	Please remove 'The loss of existing footpaths, bridle ways and cycle paths will be resisted' from the policy. Loss is unlikely to happen but diversion is possible. Furthermore, it may be worth linking the policy to any infrastructure plan in the parish to improve local infrastructure such as pathways, bridleway and extend cycle networks. Please refer to the WSCC Public rights of Way team for any guidance they may be able to offer.	For clarification.
Parking and New Development (Policy GA3)	<p>There is a requirement for further clarification on what is meant by 'standards adopted at the time' Standards are usually stipulated by WSCC's parking calculator. It is recommended that this link is clearly cited within the policy to provide necessary clarity for applicants.</p> <p>'Proposal that would result in a [insert] 'net' loss of parking spaces either on or off street will resisted.'</p> <p>Again the supporting text is quite specific and could be contrary to prevailing standard as advocated by the text in bold (presumably the policy). This is not clear and leans towards a design code. Has WSCC agreed to the principles advocated in the plan? A record of communication would benefit the examiner in his/her understanding especially if County Highways are supported of the 'criterion' as stipulated in the plan.</p>	For clarification
Supporting Existing Employment and Retail (Policy EE1)	No further comment.	n/a
Employment Land (Policy EE2)	<p>This policy asks for a 'deliverable and viable business plan' for proposal for new commercial development. This is not within the remit of land use planning and cannot be required to support a planning application. This reference should therefore be deleted.</p> <p>The comment regarding Harwoods should be removed from the plan as it has no relation to the neighbourhood plan and is instead commentary on a separate planning application already ongoing in the plan.</p>	To meet the basic condition

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Local Shopping Facilities (Policy EE3)	No further comment.	n/a
Improving Signage (Policy EE4)	Minor comment: EE4.2 does not link with the actual policy and should perhaps be included as a 'community aim' rather than a policy. The initiative could come forward through the parish and funded through CIL as monies are passed over to the parishes as part of the 'neighbourhood plan contribution of 25% of all CIL receipts in an area with a made neighbourhood plan'.	For Clarification.
Sustainable Recreational and Tourism Activities (Policy EE5)	No further comment.	n/a
Rural Buildings (Policy EE6)	No further comment. It is noted the supporting text goes on to stipulated project which require substantial work will not be supported which contradicts the main body of Policy EE6. This will cause confusion and further clarification is required.	Clarification sought.
Communication Infrastructure (Policy EE7)	Noted	n/a
Support Independent Living (policy LC1)	No further comment	n/a
Healthcare Facilities (Policy LC2)	No further comment	n/a
Provision of Buildings of Community Use (Policy LC3)	The development of an infrastructure delivery plan for the parish would have demonstrated to the examiner the intention of the parish to enhance community facilities in the Parish and set out intended investment priorities perhaps funded by CIL.	To aid the examiner

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Protection of Assets of Community Value (Policy LC4)	LC 4.2 refers to the loss of shops/services and perhaps belongs to another policy. The latter half of Policy LC4 may not be compatible with existing legislation regarding Assets of Community Value as it exceeds what powers are covered under the current arrangements.	To meet the Basic Conditions.
Designation of Local Green Space (Policy LC5)	The designation of local green space must meet the criteria set by Paragraph 77 of the NPPF. It will be for the examiner to decide if the LGS proposals do meet the requirements but evidence to demonstrate this would have greatly aided the examiner. Schedule B – Local Green Space – Policy LC5 a minor points on this topic Could the green spaces be numbered so it can be easily located on the map?	To meet the Basic Conditions.

Comments of the Sustainability Appraisal/Strategic Environmental Assessment

Overview

One of the basic conditions that a Neighbourhood Plan must meet is that it must conform to the requirements of EU legislation. In terms of this Neighbourhood Plan the relevant legislation is the European Directive 2001/42/EC on the strategic assessment of plans and programmes (this has been transposed into UK law via the Environmental Assessment of Plans and Programmes Regulations 2014). The starting point for this review is, therefore, is to consider if the Sustainability Appraisal/Strategic Environmental Assessment adheres to all of the requirements of this Directive. Throughout this review are a number of refinements to the SA are identified to ensure that this legal test can be met.

A Screening Opinion from Horsham District Council determined that a Strategic Environmental Assessment (SEA) was required because the plan was likely to allocate land for development. This is the standard approach being adopted by the council to all Neighbourhood Plans. The West Chiltington Neighbourhood Plan Council (WCNPC) then determined that the SEA should be broadened to provide a Sustainability Appraisal (SA). This will give a systematic demonstration of how the plan will contribute to the sustainable development of the plan area which is another basic condition that that such plans must adhere to.

The SA/SEA is, therefore, forms an important part of the evidence base for the plan and this review is intended to ensure that this part of the process complies with the Regulations and is as strong as possible. There is a need to be proportional in terms of the area covered by the Neighbourhood Plan and the number of issues it seeks to address. However, as Neighbourhood Plans form part of the development plan such plans and their associated evidence base must be robust. The SA/SEA that has been produced to date has followed the correct procedures. A Scoping Opinion has been provided and the early stages of producing an SA/SEA have been followed and included in a Scoping Report. The latter was then subject to consultation with the relevant consultees. A draft SA/SEA has been produced which will sit alongside the Pre Submission Draft of the West Chiltington Neighbourhood Plan.

Note – paragraph 1.4 of the WCNP indicates that a Screening Opinion indicated that an SEA was not required this needs to be amended.

Comments on the baseline information

This should include any plans, policies and programmes that are relevant to the area in terms of sustainable development. In this instance this is included in the Scoping Report. It is appreciated that comments have been given by the council on the latter document when it was originally produced. However, in the meantime the approach to Neighbourhood Plans has moved on from a light touch approach and Examiners are giving greater scrutiny to the evidence base. Furthermore, there is a need to update the information as the Scoping Report was produced in 2015.

Plans and policies

Reference should be made to the South Downs National Park Local Plan – Preferred Options (September 2015) due to the presence of the National Park partly within and adjacent to the parish. Although little of the parish falls within the National Park views into and out of this designated area are important considerations when reviewing allocated sites. This is not an adopted Local Plan but it does demonstrate a direction of travel.

It would also be useful to make reference to any Neighbourhood Plans adjacent to the parish that are being developed. This would give an indication of any issues that might affect West Chiltington parish; including any allocated sites that could impact on the plan area. The latter is particularly relevant given the traffic issues that affect the parish.

Baseline data

The SEA Directive lists the environmental issues that should be included in the assessment. Not all of these have been included in the baseline information. Information on archaeology (including non-designated heritage assets) and soil (which in this case would be agricultural land quality) have been omitted.

There are also socio-economic issues that should be included in the baseline information. Although there is a cross reference to the Housing Needs Study it would be helpful to include the main outcomes of this Study within the SA; particularly as the provision of affordable homes is such a significant issue for the plan. In addition, a justification for the number of houses being allocated in the plan should be included in the SA. As traffic has a negative effect on the parish, information on this would be useful; such as car ownership and usage.

Finally, as the objectives of the plan mentions the need for housing to complement the character and local distinctiveness of the area it would be useful if there was some information on this in the baseline information. What are the particular characteristics that are important to the plan area? This is likely to be a combination of landscape and the built environment. The Village Design Statement will be a useful source of information in relation to the latter.

It is noted that much more baseline information has been included in the Neighbourhood Plan itself. It would be preferable if this was included in the SA/SEA as this clearly demonstrates the environmental and socio-economic issues that are relevant to the area. At the very least the SA should cross refer to this information. Without this background it is not clear how the key sustainability issues have been identified and which ones maybe effected by the plan. If there are instances where information is not available this can be indicated in the SA/SEA as this demonstrates that there is a gap in the evidence base.

Consultation

It would helpful to include the dates for the consultation on the Scoping Report and the comments that were received. It would then be advisable to set out how

the information in the SA/SEA was updated as a result of these comments.

The SA/SEA

The format of this document follows the list of the requirements of the SEA Directive. However, this means that in places it does not follow a logical sequence. For example, the social, economic and environmental issue without the WCNP are in section 4 and, therefore, is before the appraisal has been carried out. This could form a reasonable alternative to the current policies in the plan (the do nothing option) and should, therefore, appear later in the document. The rest of this review contains comments on each of the sections of the SA/SEA.

Section 1

This should indicate that a Scoping Report has been produced and some of the relevant information is contained in the report (this is where the consultation dates and outcomes could be included).

In paragraph 1.3 there is a reference to the limits on the amount of data that is available. If there are examples of where this is the case these should be mentioned in the SA.

Section 2

This contains the list of the requirements for an SEA in the EU Directive. The key point of the SA is to identify the main socio-economic and environmental effects of the plan; to reduce or offset any negative effects and to enhance any positive effects. It provides the main vehicle to explain how the plan has been developed, what alternatives have been considered and to demonstrate that the most sustainable options have been chosen. Whilst it needs to be proportionate it must also be robust.

Section 3

See the comments on the Scoping Report for additions to the plans and programmes that should be included as an update to this information.

Section 4

See the general comments on the SA in relation to this section. Paragraph 4.2 gives an indication of how the area would evolve without the plan. This could provide a reasonable alternative to the policies in the plan and hence, should be moved to later in the plan.

Section 5

As set out earlier in this note not all of the issues listed in the Directive have been included in the SA. Furthermore, as this is an SA socio-economic issues should also be included as these have helped to shape the plan. There is more baseline information in the WCNP itself and other documents that form the evidence base. As a minimum a cross reference to these documents should be provided setting out the information that they contain.

Section 6

This needs to be expanded. The objectives in the plan give an indication of the socio-economic and environmental issues that the plan is seeking to address.

Section 7

It is suggested that the title of this section is reworded as this is the main part of the appraisal of the plan.

Paragraph 7.2 and the accompanying table give a useful commentary on the effects of the policies and site allocations in the plan. This could form the appraisal of the plan if it was combined with an amended version of Appendix A. It would be preferable if potential negative effects were clearly identified together with any mitigation measures. Any significant effects from the plan should form part of the ongoing monitoring. The table should also reference the policy numbers in the plan for clarity.

Paragraph 7.3 and the accompanying table require significant amendment. The appraisal method does not distinguish between a positive, neutral and negative effect. Having no impact and mitigable as one category does not allow the mitigation measures to be clearly identified. Furthermore, the table suggests that it is appraising the objectives and policies in the plan together. The best approach would be to test the compatibility of the objectives in the plan against the SA objectives and then appraise the policies separately.

Section 7.4 provides a commentary of the policies and how the objectives meet the NPPF. Whilst the latter is helpful the commentary does not establish if any of the policies are likely to have a negative effect or, indeed, what the positive effects are likely to be. There is no link between this section, the table after paragraph 7.2 and the table in Appendix A which contains an appraisal of the policies.

Section 7.5 deals with reasonable alternatives. This is an important part of the process and provides one of the links between the SA/SEA and the Site Assessment Report. It would be helpful to include more detail on the process undertaken to assess the sites within the SA. For clarity the names of the sites that have been allocated should be included in the SA.

The reasonable alternatives that could be appraised could be the sites that remained after the initial screening or just a selection of these sites. At the very least the SA should explain why the sites are not considered to be a reasonable alternative.

Another reasonable alternative could be the number of houses allocated in the plan compared to the figure in the Pre Submission Draft. This would link to the evidence which justifies the total number of houses that are allocated.

Finally, the reasonable alternative in terms of the policies in the plan could either be other options that were debated by the group but rejected or the “do nothing” option of not producing a Neighbourhood Plan. Hence, an amended section 4 could be used for this.

Section 8

This should come before the consideration of alternatives in section 7.5. The appraisal of the policies is included in Appendix A. There are some weaknesses with this. There is no explanation of the methodology. The categories used to for the appraisal are very broad and the appraisal should use the SA/SEA objectives. It is noted that only one of the policies has a negative score and, no mitigation measures or potential to enhance the policies are suggested.

The appraisal of the policies could be tied into the commentary in the table after paragraph 7.2 which explains how the plan contributes to the key issue for the plan area under a range of sustainability criteria.

Section 9

It is suggested that the Authority Monitoring Report produced by Horsham District Council is also referenced in terms of monitoring the WCNP and its effect on sustainable development. This will monitor some of the issues at a strategic level.

Omissions

The SA/SEA does not include a specific appraisal of the allocated sites. It will be necessary to carry out an appraisal of the sites against the SA/SEA objectives together with the reasonable alternatives. Policy H1 which allocates the sites should include any mitigation measures that are necessary to reduce the impact of these developments

The potential cumulative effects of the plan are not addressed which is a requirement of the SEA legislation. The following is the type of argument that could be included in the SA. There is the potential for a cumulative effect from an increase in traffic as the area is used for “rat running” and has narrow roads. There is also potential for a cumulative effect on the local landscape; particularly key views and the settlement separation zone. However, given the scale of the development proposed in the plan means that this effect is not likely to be significant.

Mitigation measures are not clearly identified in the SA/SE for either the policies or site allocations. This is a requirement of the Regulations. There is one mention of mitigation in the table after paragraph 7.2. This should be highlighted in a summary section at the end of the report; together with any others that are identified in the reworking of the SA/SEA.