



# **Warnham Neighbourhood Development Plan**



**Sustainability Appraisal incorporating Strategic  
Environmental Assessment**

**June 2018**

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# **1 NON TECHNICAL SUMMARY FOR THE SUSTAINABILITY APPRAISAL**

- 1.1 This Sustainability Appraisal (which includes a Strategic Environmental Assessment) has been prepared to support the Warnham Neighbourhood Development Plan's Basic Conditions Statement. The purpose of this 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 Warnham. It forms an important part of the evidence base for producing the Neighbourhood Plan.
- 1.2 The Warnham Sustainability Framework Scoping Report was published by Warnham Parish Council in March 2016. It was the subject of a six week consultation with Horsham District Council, the Environment Agency, Natural England and Historic England. A summary table of the comments from the statutory consultees is contained in Appendix A. The objectives have been amended to take account of the advice and comments received. The Scoping Report was updated to include the feedback in August 2017.
- 1.3 The draft Sustainability Appraisal was prepared in January 2018. This final version of the document has been amended in the light of the representations received at Pre-Submission (Regulation 14) Consultation stage and in light of amendments made subsequently to the Neighbourhood Plan, prior to Submission (Regulation 16).
- 1.4 The commitment to the achievement of sustainable development has been set out in legislation introduced at both European and national level. In 2004 the European Directive on Strategic Environmental Assessment (Strategic Environmental Assessment) was implemented in the UK. This sets out the requirement for Strategic Environmental Assessment, which has been incorporated into the Sustainability Appraisal process. Section 39 of the Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. The Sustainability Appraisal incorporates the Strategic Environmental Assessment process – for ease, this report is referred to as the Sustainability Appraisal from now on in this document, although it incorporates the elements required for Strategic Environmental Assessment.
- 1.5 Sustainable development is about ensuring a better quality of life for everyone, now and for generations to come. It is about considering the long-term environmental, social and economic issues and impacts in an integrated and balanced way. The UK Government has set five guiding principles to achieve the sustainable development purpose. These principles form the basis for policy in the UK and are as follows:
  - Living within environmental limits
  - Ensuring a strong, healthy and just society
  - Building a strong, stable and sustainable economy
  - Promoting good governance
  - Using sound science responsibly
- 1.6 One of the means by which sustainable development can be achieved is through the land-use planning process. The Warnham Neighbourhood Plan will need to be in general conformity with the Horsham District Planning Framework. If approved by a referendum, the Neighbourhood Plan will become a part of the development plan for the parish of Warnham.

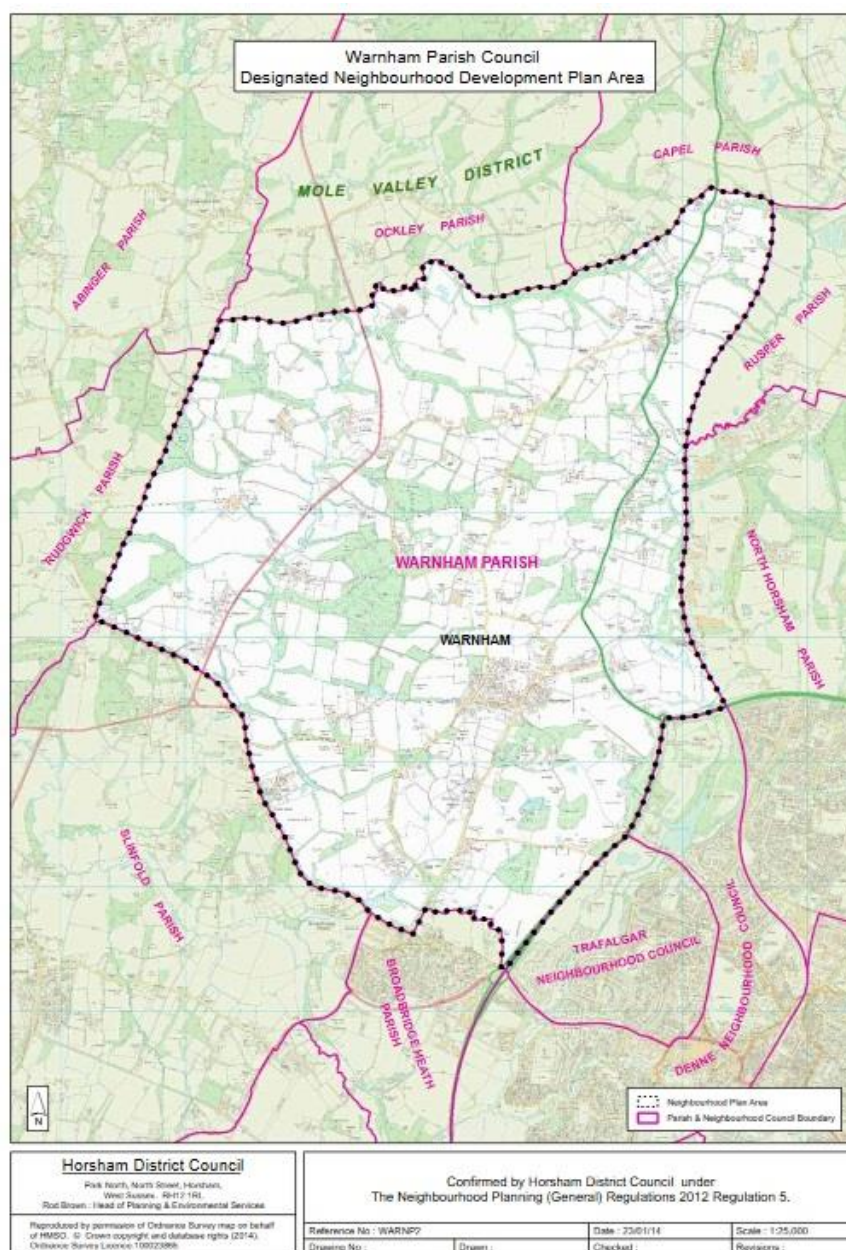
- 1.7 The Warnham Neighbourhood Plan can help to achieve sustainable development as it aims to ensure that development meets the needs of people living and working in the parish, while at the same time helping to ensure that adverse environmental impact is minimised.



## 2 METHODOLOGY

- 2.1 The Warnham Neighbourhood Development Plan (WNDP) covers the whole of the parish of Warnham (see Figure 1.1). It has been prepared by a Steering Group comprising members of Warnham Parish Council and volunteers from the community. To inform the Sustainability Appraisal, they collected data about Warnham on a wide range of matters.
- 2.2 The majority of the district-wide data had already been collected for the Sustainability Appraisal for the HDPF and had been obtained from the various sources best placed to provide accurate data in their relevant area of expertise. This information has enabled the environmental, social and economic issues facing both the district and Warnham to be established.

**Figure 1.1: Warnham Neighbourhood Plan Area**



- 2.3 The Plan has been developed by the Warnham Neighbourhood Plan Steering Group following an extensive programme of engagement with the local community. The focus of the Plan has been on addressing the needs of all stakeholders within the community.
- 2.4 In consultation with the community, the vision set out below looks back from the year 2031 to review how the Neighbourhood Development Plan, written by the parish in 2016, has regulated and maintained the parish in the intervening years.

**Countryside and environment**

1. Over the duration of the Plan the parish has remained predominantly rural with the concentration of population within Warnham village; Kingsfold, Winterfold and Rowhook are established communities within the parish.
2. The Plan has safeguarded the tranquil environment and biodiversity of the parish and protected its heritage and conservation area. It has maintained public open spaces and access to the countryside afforded by its extensive network of Rights of Way.
3. The herd of red deer continues to flourish and remains a key symbol of the parish.

**Community, housing and economy**

4. Warnham is an attractive place to live and much sought after, with enhanced property values.
5. The parish has not had large-scale new developments. Additional sustainable housing focussed on proven, local needs has been constructed, comprising a mix of properties including social and affordable housing, homes for first-time buyers and those for the elderly. Their layout and design has been widely praised and their residents have been integrated with the existing communities.
6. The developments have protected the parish's historic and listed buildings and ensured their settings and environs have not been diminished.
7. Over the course of the Plan the rate of expansion of the housing base of the parish has not exceeded the historic growth rate.
8. Developments have conformed to the Warnham Neighbourhood Development Plan, Warnham Parish Design Statement and Horsham District Council's policies and plans.
9. Developments have been located where dependence on motorised transport is minimised.
10. Parish businesses have expanded and strengthened, providing increased local employment opportunities. Additional business premises have been successfully integrated into the parish environment.
11. High-speed broadband is now available throughout the parish.
12. The village shops and public houses have prospered in the Plan period.

**Recreation and amenities**

13. Warnham's cricket, football and tennis facilities are well used and have youth teams promoted by their clubs. The football pitch has been retained.
14. The Village Hall and adjacent children's playground are well maintained and used. A new playground has been provided to serve the community at Kingsfold.
15. The village primary school has continued to flourish.
16. Warnham's young people have been provided with a meeting place appropriate for their needs. It has provided a centre of youth activities and support to vulnerable younger members of the community.

**Traffic and transport**

17. Flight paths to and from Gatwick airport have been routed to minimise noise and environmental impacts on the parish. The threat of a second runway at Gatwick has been averted.

18. The safety record of the A24 has been significantly improved through traffic control and engineering improvements at accident locations, and a pedestrian crossing in Kingsfold.
19. Warnham village has limited non-local traffic through effective traffic control measures.
20. The hourly bus service through the parish has been maintained and is now routed to Horsham hospital and railway station.
21. Warnham railway station has a car park.
22. A cycle route has been constructed from Bell Road, linking to Horsham.

2.5 In order to deliver the vision, the objectives of the Neighbourhood Development Plan, as identified through engagement with the community, are as follows:

<b>Residential Development</b>
<p><b>Objective 1:</b> To ensure that future development is consistent with protecting and maintaining the largely rural character of the parish.</p> <p><b>Objective 2:</b> To promote a balance of social mix and age distributions within the parish.</p> <p><b>Objective 3:</b> To safeguard the parish character and heritage with particular regard to design and development in the Conservation Area.</p> <p><b>Objective 4:</b> To avoid housing development in areas prone to flooding or overflowed by established flight paths.</p>
<b>Countryside and Environment</b>
<p><b>Objective 5:</b> To protect the natural environment and tranquillity of the parish.</p> <p><b>Objective 6:</b> To conserve and enhance areas of natural habitat.</p>
<b>Local Economy</b>
<p><b>Objective 7:</b> To encourage appropriate businesses within the parish.</p>
<b>Transport and Movement</b>
<p><b>Objective 8:</b> To encourage cycling, walking and public transport services.</p> <p><b>Objective 9:</b> To address traffic and parking issues in the parish.</p>
<b>Community Cohesion</b>
<p><b>Objective 10:</b> To maintain and foster Warnham's community spirit.</p>

Each of the objectives has been assessed against the strategic objectives of the Horsham District Planning Framework (2015) as illustrated in Table 2.1.

Neighbourhood Plan Objectives	District Plan Spatial Objectives
<b>Theme 1: Housing development</b>	
To ensure the largely rural character of Warnham is protected and maintained	Identify and preserve the unique landscape character and the contribution that this makes to the setting of rural villages and towns and ensure that new development minimises the impact on the countryside

<p>To safeguard the parish character and heritage with particular regard to design and development in the Conservation Area and public open spaces/leisure areas.</p> <p>To promote a balance of social mix and age distributions within the parish</p> <p>To encourage cycling, walking and public transport usage</p> <p>To avoid areas overflowed by established flight paths</p>	<p>To safeguard and enhance the character and built heritage of the district's settlements and ensure that the distinct and separate character of settlements are retained and, where possible, enhanced and amenity is protected</p> <p>Provide a range of housing developments across the district that: delivers the target number of new homes; respects the scale of existing places; and so far as is possible caters for the needs of all residents, including the delivery of a range of housing sizes and types including affordable housing</p> <p>Ensure that new development minimises carbon emissions, adapts to the likely changes in the future climate and promotes the supply of renewable, low carbon and decentralised energy</p>
<b>Theme 2: Economy</b>	
<p>To encourage appropriate businesses (non-polluting, modest size etc.) within the parish</p>	<p>To promote a living and working rural economy where employment opportunities exist which reduce the need for residents to travel, including reducing commuting distances, and facilitate and promote innovation in business including such as high speed broadband.</p>
<b>Theme 3: Traffic and transport</b>	
<p>To address traffic and parking issues in the parish</p> <p>To promote public transport services</p>	<p>To protect, enhance and, where appropriate, secure the provision of additional accessible community services, facilities, open spaces and infrastructure throughout the district in accordance with local and district needs</p>
<b>Theme 4: The Environment</b>	
<p>To conserve and enhance areas of natural habitat</p> <p>To promote environmental protection</p>	<p>To safeguard and enhance the environmental quality of the district, ensuring that development maximises opportunities for biodiversity and minimises the impact on environmental quality including air, soil, water quality and the risk of flooding</p> <p>To locate new development in sustainable locations that respect environmental capacity and which have appropriate infrastructure, services, and facilities in place, or where these can realistically be provided; and to encourage</p>

To protect the natural environment and tranquillity of the parish	<p>the appropriate re-use of brownfield sites in sustainable locations</p> <p>Identify and preserve the unique landscape character and the contribution that this makes to the setting of rural villages and towns and ensure that new development minimises the impact on the countryside</p>
<b>Theme 5: Community</b>	
To maintain and foster Warnham's community spirit	<p>Ensure that future development in the district is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and delivers living, working, and balanced communities which contribute to community cohesion</p>

- 2.6 Table 2.1 demonstrates that there are no conflicts.
- 2.7 The Warnham Sustainability Appraisal has developed its own 10 sustainability objectives, based on the sustainability objectives in Horsham District Council's District Planning Framework and the baseline data collected. Local issues and objectives have been identified, and the indicators used to measure these are from local sources at a local scale wherever possible. These will help assess the sustainability issues facing Warnham, to be addressed where possible in the Neighbourhood Plan.

### 3 POLICY CONTEXT

- 3.1 The Warnham Neighbourhood Plan has been prepared having regard to national policy and to be in general conformity with the strategic policies of the local development plan. At the national level, the National Planning Framework (NPPF) establishes the scope and purpose of neighbourhood plans. At the local level, the Horsham District Planning Framework (HDPF) adopted in 2015 sets out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs for the district (outside the South Downs National Park).
- 3.2 Starting at the international level and working down in scale this covers the key policies that the Neighbourhood Plan should adhere to or consider. While it is common sense to ensure the Plan and SEA/SA reviews these requirements, it is also a requirement of the SEA Directive which states that the Environmental Report should include:

*"..an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"*

*"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"*

[Annex 1(a) and (e)]

- 3.3 Within this context it is stated in the NPPF that work for Neighbourhood Planning is proportionate with the scale and ambitions of the plan. We have therefore considered a range of relevant policies and plans for this assessment considering international, national, regional (South East England), and local (County and Borough) plans and policies.
- 3.4 Appendix B provides a detailed description of the programmes, plans and other documents which influence the Plan. Table 3.1 summarises the main areas where these documents specifically impact on the development of the Warnham Neighbourhood Plan.

Policy Context	Commentary
International context	The WNDP should consider impacts on air quality, water and European protected species and environments.
National context	The WNDP should be in general conformity with the NPPF, contributing to the objective of achieving sustainable development (social, economic and environmental). Objectives should reflect the core planning principles and policies set out in the NPPF. The Plan should: <ul style="list-style-type: none"> <li>• contribute to minimising impacts and providing net gains in biodiversity where possible</li> <li>• contribute to the Government's commitment to halt the overall decline in biodiversity – including by establishing coherent ecological networks that are more resilient to current and future pressures.</li> </ul>
Regional context	The WNDP should be in conformity with the strategic objectives of the Horsham District Planning Framework. As the local planning authority

	<p>for Warnham, Horsham District Council is responsible for setting targets for housebuilding.</p> <p>The Horsham area currently contains just short of 55,000 homes, and an additional 16,000 over the next 20 years is required to meet the needs of the growing economy around the Gatwick Diamond. The majority of these homes have already been granted permission.</p> <p>The HDPF makes provision for 1,500 units to come forward through neighbourhood planning and sites to achieve this allocation will need to be found. At the time of publication, Horsham is able to demonstrate that it has a five-year housing land supply.</p> <p>HDPF Policy 4 states that expansion of settlements will be supported where it is presented in a Neighbourhood Plan and where it adjoins an existing settlement. The village of Warnham is classified as a 'medium village' and such settlements are identified as having the potential to address identified local needs. Limited development may be pursued to meet these needs and support rural services and infrastructure, but a balance needs to be struck between environmental constraints and fundamentally altering local character.</p>
Local context	<p>It should be noted that a number of other parishes in the vicinity of Warnham are in the process of preparing, or have completed, neighbourhood plans. These are:</p> <p><u>Under preparation:</u> Ashington, Billingshurst, Bramber, Cowfold, Henfield, Horsham Blueprint, Itchingfield, Lower Beeding, North Horsham, Pulborough, Rudgwick, Rusper, Shipley, Southwater, Storrington, Sullington and Washington, Upper Beeding, West Chiltington, West Grinstead.</p> <p><u>Made:</u> Nuthurst, Shermanbury and Wineham, Thakeham, Woodmancote.</p> <p>These plans could potentially have a residual effect on Warnham parish.</p>

## 4 PARISH CHARACTERISTICS AND ISSUES

- 4.1 The SEA Regulations require that certain environmental topics are included within the environmental baseline collected to inform the SEA. The topics required by the SEA Regulations are shown in Table 4.1.

**Table 4.1: Topics and their relevance to the Warnham Neighbourhood Plan**

Topic	Relevance to the Warnham NP
Nature conservation	Potential for new site allocations to impact on the habitats of species within areas of nature conservation value.
Landscape	Potential for new site allocations to impact on the varying landscape qualities of the area.
Water	<p>Risk of flooding impacts on where people live and can impact on the economic prosperity of an area.</p> <p>The way in which water is drained off of land, including road and other hard surfaces, can be important to the level of flood risk experienced in an area.</p> <p>Flooding from insufficient sewer capacity also a threat.</p>
Soils	Limited potential for site allocations and development to impact on best agricultural soils or important geological sites.
Heritage	Historic environment features can be vulnerable to damage and other impacts from neglect, decay or development pressures.
Air and Climate	Limited potential for new site allocations to create pollution through additional congestion.
Human characteristics	Potential for the plan to impact positively on human health, for example through provision of improved access to health, sport and leisure activities.
Roads and transport	Development could impact on congestion on the local road network, but could also introduce management measures to improve the traffic environment and assist in creating better links to the main routes from the neighbourhood area.
Infrastructure	Development could have an impact on the infrastructure necessary to keep society running smoothly.
Economic characteristics	Development could impact on the ability of communities to function effectively (in their interaction with services) and on the economic prosperity of an area.

- 4.2 The information relating to Warnham about each of these topics was compiled from a wide range of information sources. Firstly information came from the draft Neighbourhood Plan and associated work conducted to support it. As part of the widespread consultation work to support the plan this



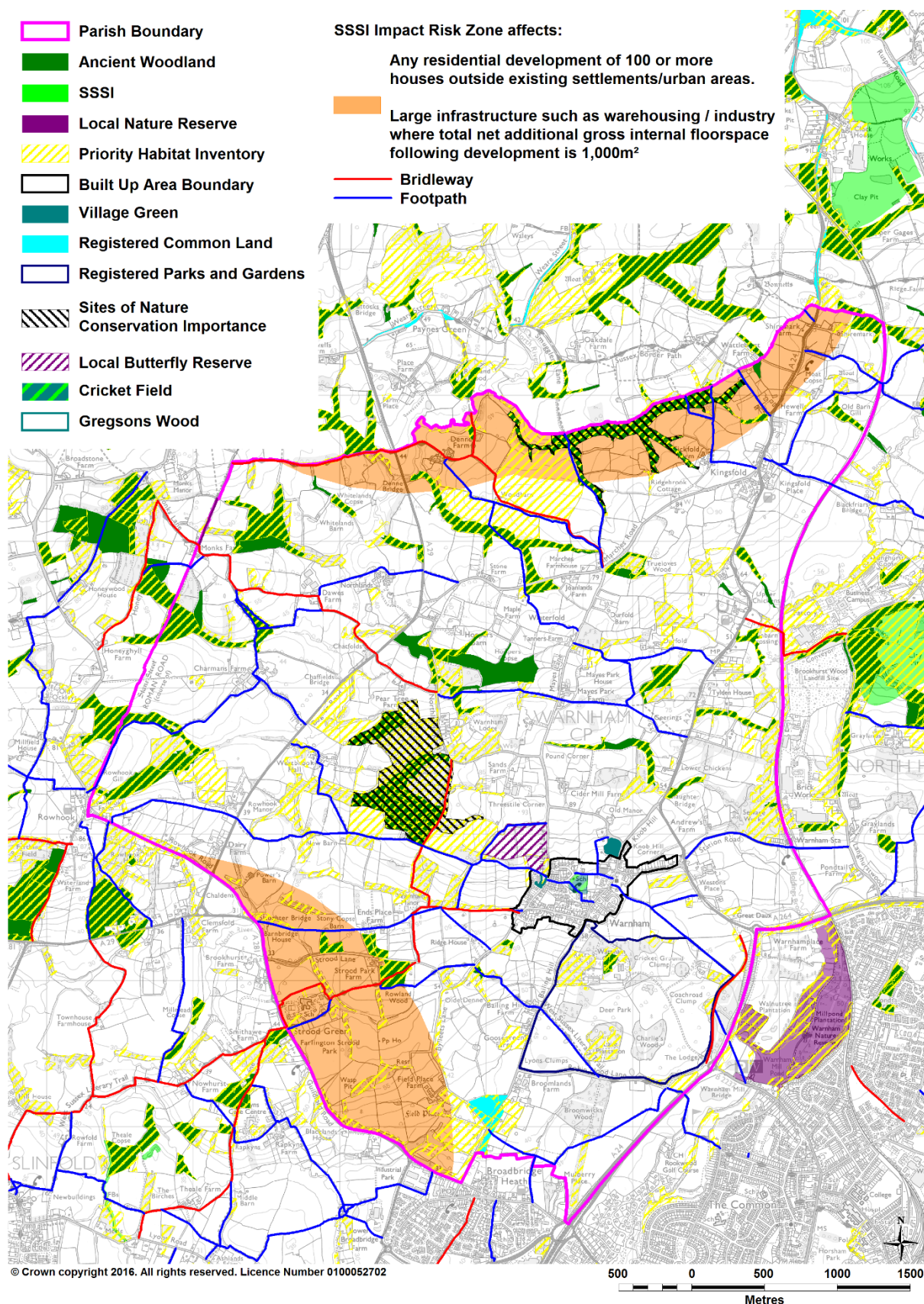
has included feedback from a range of consultees. There are also a number of key reports relevant to the environment of the area and some of their key findings have been summarised here – they are referenced through the text, as are various data sources used to provide maps and statistics. This section presents topics relevant to the Neighbourhood Plan and while it seeks to be comprehensive only the key issues are included to keep the document manageable.

- 4.3 The following sections summarise the headline information for the parish and also identifies key trends and pressures for the future. The information is categorised under topics, although it must be recognised that many of the topics are interlinked.

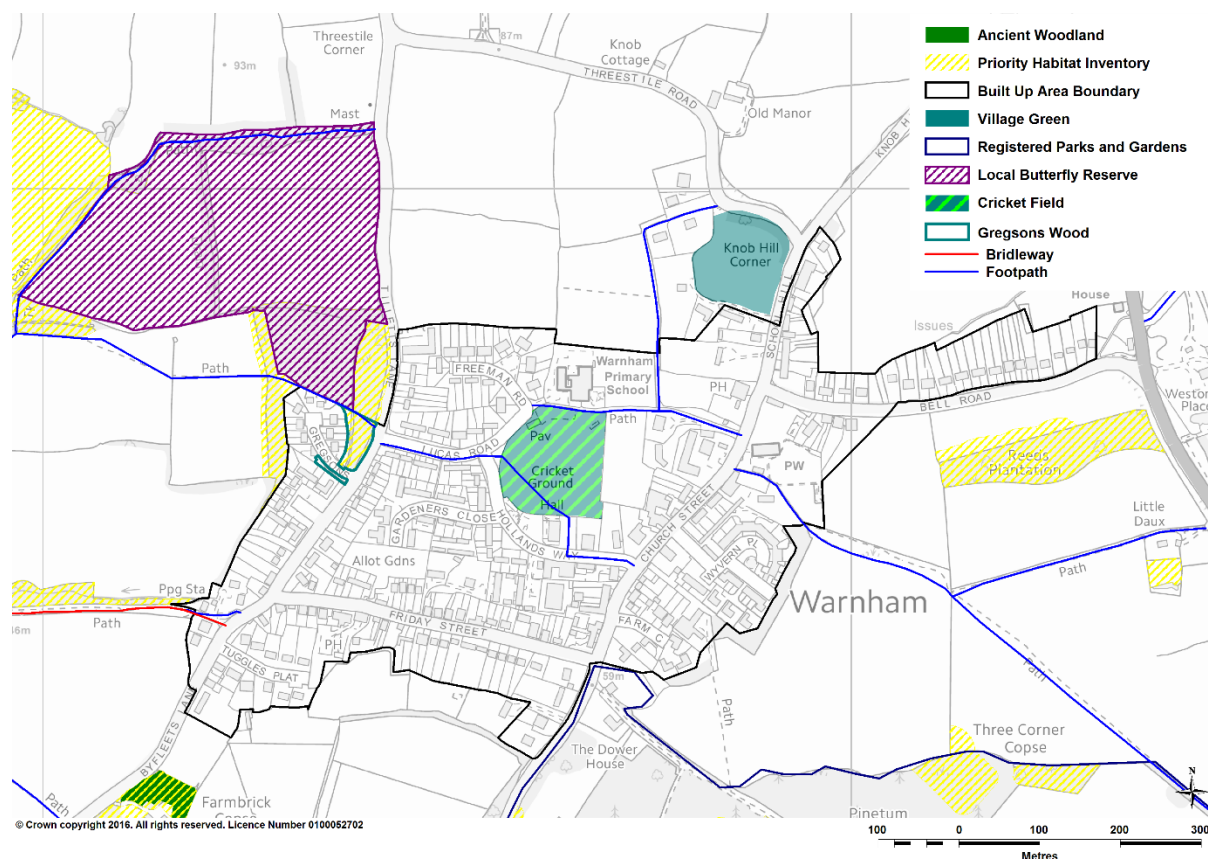
## **Nature conservation**

- 4.4 Warnham has a range of varying environmental areas which provide enjoyment and natural resources to the community and habitats to a variety of flora and fauna.
- 4.5 Warnham Nature Reserve is a 92 acre site that was designated in 1988 and lies within Horsham District just beyond the southeastern side of the parish boundary. It includes a 17 acre Mill Pond, marshes, grassland, reedbeds, hedges and woodlands. The site provides a haven for a variety of wildlife, being known to having recorded over 400 species of plants, from Common Birdsfoot Trefoil to Orchids and ancient Oaks, and over 100 species of bird, including heron, wildfowl, woodpecker and kingfishers. Over 21 species of dragonfly have been recorded.
- 4.6 The reserve's Mill Pond is fed by two streams, Boldings Brook and Chennels Brook. These are home to a wide range of wildlife, from minute pond organisms to herons; deer, foxes, plant and fungi thrive well here, in turn attracting numerous of birds, smaller mammals and insects.
- 4.7 Within Warnham, Tilletts Lane butterfly reserve was created in 2010 out of farmland to the west of Warnham village. Over 34 species of butterflies have been recorded at the site including six BAP (Biodiversity Action Plan) species: Brown Hairstreak, Dingy Skipper, Grizzled Skipper, Small Heath, White-letter Hairstreak and White Admiral.
- 4.8 A feature of the parish is the magnificent herd of internationally famous red deer reared on the 87 hectare Warnham Park Estate and exported worldwide. This has become a symbol for the parish.
- 4.9 The predominant vegetation is oak woodland with holly and hazel forming the understorey. The hazel was, in years gone by, frequently coppiced however this has largely ceased and, combined with a lack of proper woodland management generally, has caused the loss of many species in the woodland in Warnham, especially birds and butterflies. There remain numerous sites of ancient woodland as well as trees of significance within two arboretums and within the parish fields and in the grounds of properties.
- 4.10 The semi-improved grassland areas of the parish support an array of rare invertebrates. Additionally the 33 allotments in Warnham village which form a habitat for grass snakes, slow worms, mice, frogs, toads and a variety of birds. Blackthorn hedges are an important landscape and ecological feature across the parish which need both monitoring and careful management to maximise the biodiversity they support.
- 4.11 Figure 4.1 provides a map of the environmental features of the neighbourhood area. The SSSI risk zones to the north and south (marked in orange) illustrate areas where development as described in the key would be considered detrimental to the environment. Figure 3.2 provides a similar map but focussing on Warnham village.

**Figure 4.1: Key environmental features, parish wide**



**Figure 4.2: Key environmental features, Warnham village**



## Landscape

- 4.12 Warnham sits in an attractive rural setting with extensive open countryside and woodland, crossed by lanes, bridleways and footpaths. It has an area of 19.8 sq km incorporating the village of Warnham and a number of small rural communities – Kingsfold, Winterfold, Durfold, Station Road, Goosegreen and a part of Rowhook. The village itself sits within a hollow bounded by Bailing Hill to the south and Knob Hill to the north. The parish butts up to Horsham on the southeast side (at the A24), but has managed to retain its own distinct identity. Warnham has traditionally been a farming community, mostly raising cattle, sheep and pigs, with hay production. It is set in undulating topography with higher land generally to the north. The extensive areas of agricultural land and woodland, some ancient, ghylls and the hedges and trees that border many roads and lanes, define the distinctive rural character of the parish.
- 4.13 The key landscape designations that relate to the area are:
- Low Weald landscape character area – characterised by a broad, low-lying clay vale which largely wraps around the northern, western and southern edges of the High Weald. It is predominantly agricultural, supporting mainly pastoral farming owing to heavy clay soils, with horticulture and some arable on lighter soils in the east, and has many densely wooded areas with a high proportion of ancient woodland.
  - Warnham and Rusper wooded ridge - characterised by dense woodland covering the low ridges of Weald Clay, with mostly small irregular fields surrounded by large and small woodlands and many shaws/hedgerows. Despite noise intrusion from Gatwick airport, mainly in the north of the parish, the area retains a rural unspoilt character, and the historic dispersed settlement pattern is largely intact.

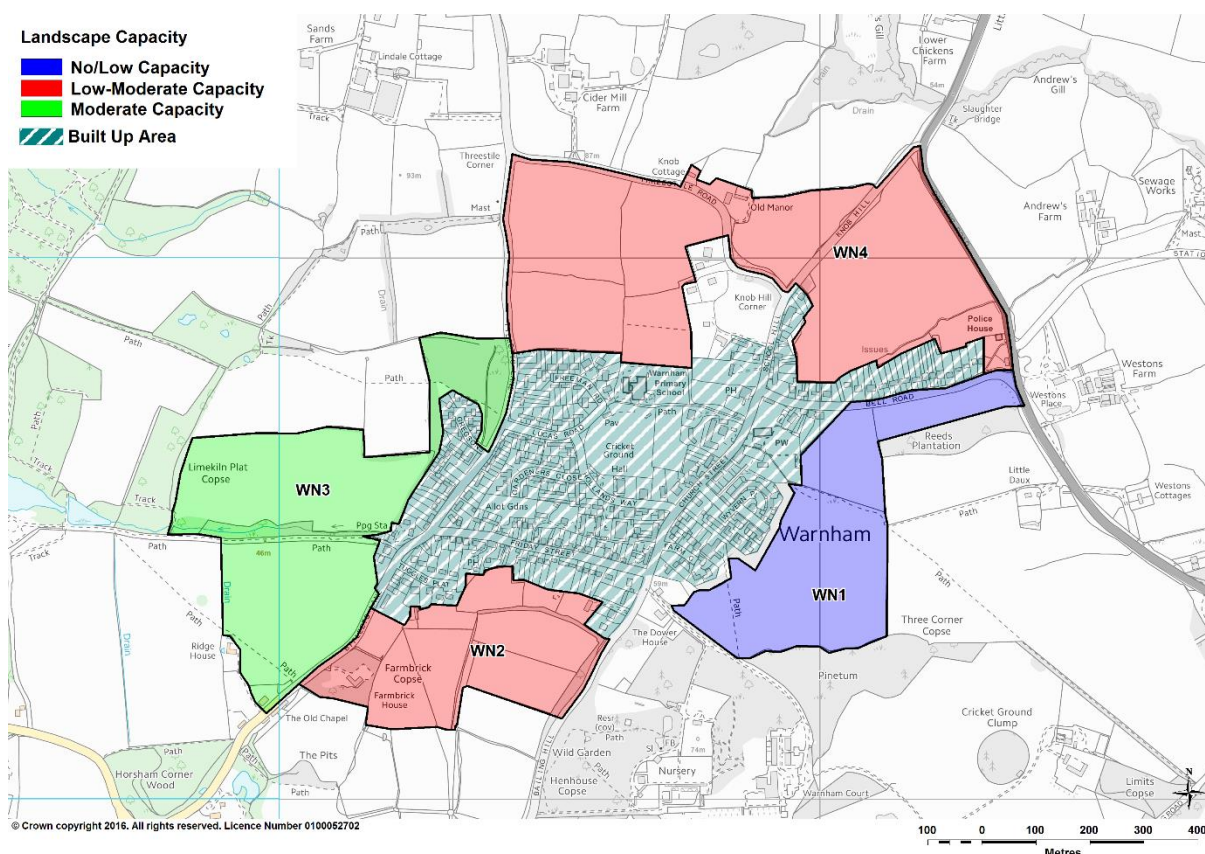


- Warnham and Faygate Vale – a narrow vale on Weald Clay with a medium to large scale field pattern of mainly arable farmland. Small isolated patches of woodland, scattered farmsteads and small hamlets. It includes the large area of historic parkland at Warnham with its prominent tree clumps in grassland, extensive boundary treebelts and avenue tree features.
- Conservation area – the centre of Warnham village is designated as a Conservation Area that includes Friday Street, Church Street and School Hill. It has a varied and interesting range of buildings dating from the fifteenth century to new build, and the open spaces of the village green and the cricket field.

4.14 The Horsham District Landscape Capacity Report (2014) assessed areas around the village of Warnham in terms of their development potential. Figure 4.3 shows a map of assessed areas and the Table 4.2 provides a summary of their development potential where:

- A 'Low' rating for landscape capacity indicates the area is unable or only has very limited potential to be able to accommodate the specified type and scale of development without unacceptable adverse landscape and visual effects or compromising the values attached to it, taking account of any appropriate mitigation.
- A 'Low/moderate' capacity rating indicates an area only has potential to be able to accommodate development in limited locations without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation.
- A 'Moderate' capacity rating indicates an area has an ability to accommodate development in some parts without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation.

**Figure 4.3: Locations assessed for development potential**



**Table 4.2: Development potential of village areas**

Source: Landscape Capacity Study, 2014, Horsham District Council

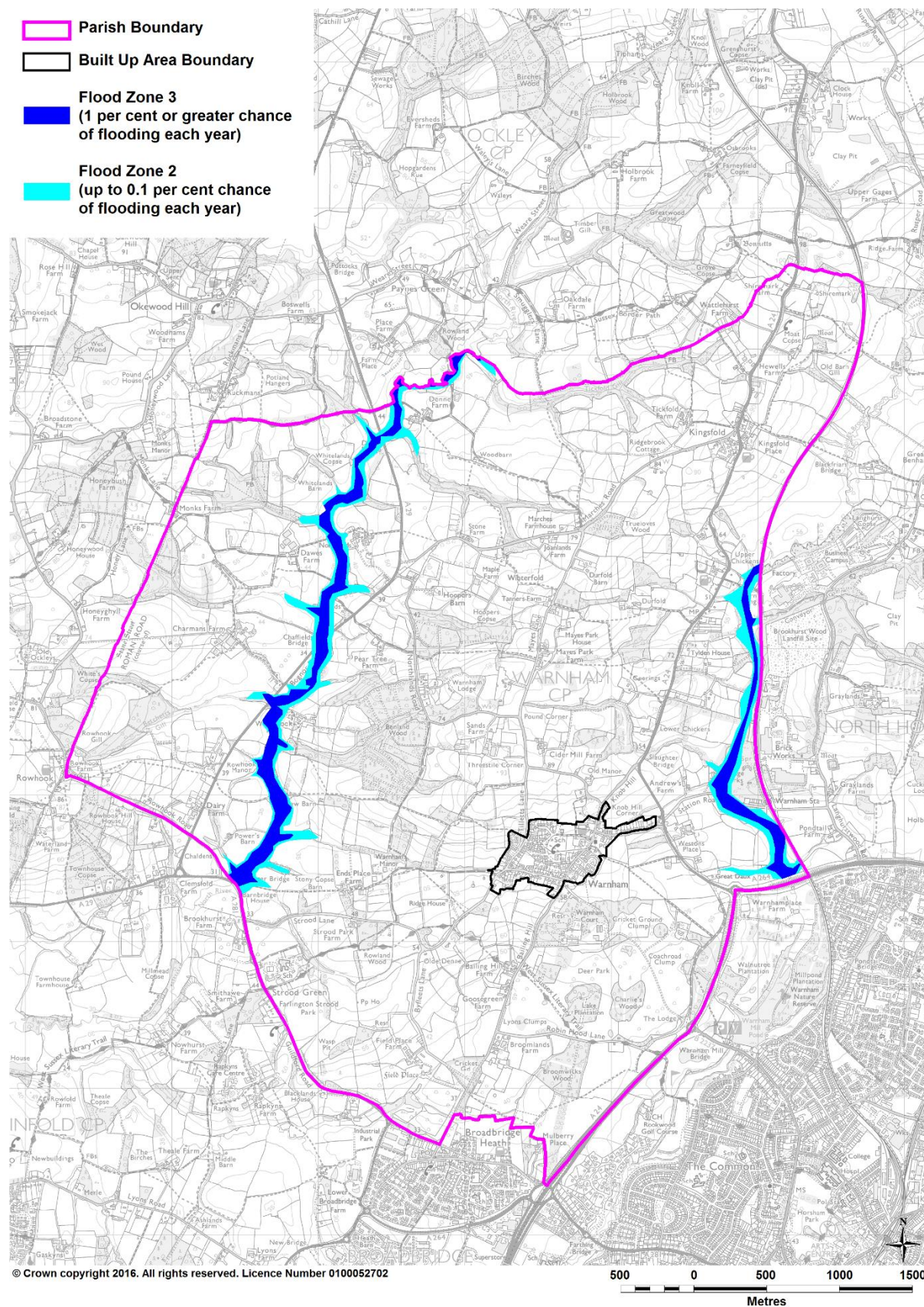
Segment assessed	Summary of finding
WN1	Low/No
WN2	Low/Moderate
WN3	Moderate
WN4	Low/Moderate

## Water

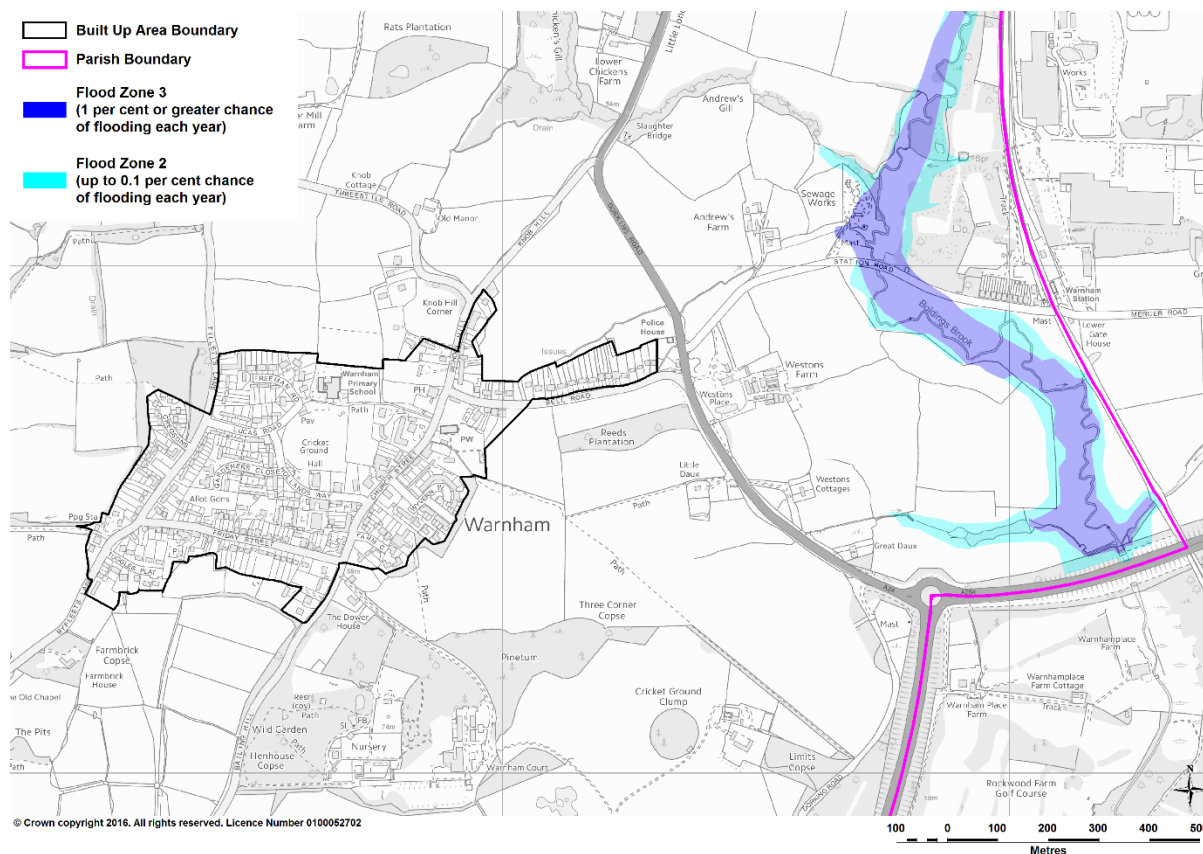
- 4.15 Two principal watercourses flow southwards through the parish: North River close to the route of the A29 and Boldings Brook leading to Warnham Mill Pond on the east side of the parish.
- 4.16 The national property database, when mapped against the Environment Agency's map of 'areas susceptible to surface water flooding' reveals that less than 10 properties within Warnham village are susceptible.
- 4.17 There have been a few reporting incidences of flooding and the Environment Agency has confirmed that apart from the zones around the two rivers, the large majority of the parish is in Flood Zone 1, which is defined as having a low probability of flooding from rivers or the sea.
- 4.18 Warnham's water is sourced through Southern Water, who have identified climate change as the major factor that could impact on how they supply water and how they deal with flooding in the future. Southern Water is working on ways in which to respond to the additional pressure exerted through climate change and increased development. Climate change is likely to result in the more frequent occurrence of all types of flooding including fluvial, surface water, sewer and ground water flooding.
- 4.19 Maps of the Flood Zones are shown in Figures 4.4 and 4.5 below.



**Figure 4.4: High flood risk areas (parish wide)**



**Figure 4.5: High flood risk areas (Warnham village)**



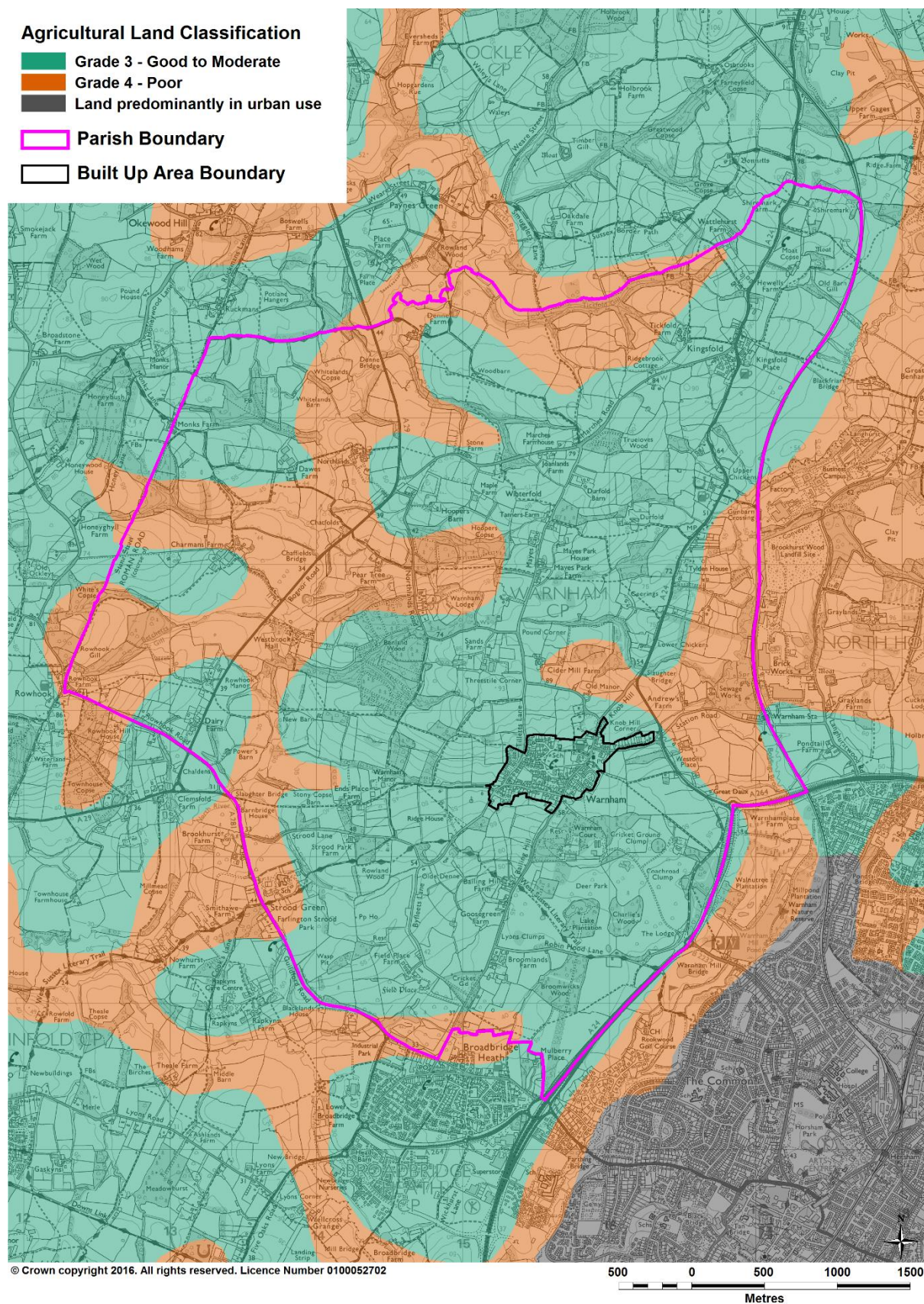
## Soil and Geology

- 4.20 Geologically, the parish lies in the lower Sussex Weald belt, with the soil composed almost entirely of heavy Wealden Clay with some layers of flaggy sandstone, Horsham Stone. The clay deposits within the area have formed the basis of local industries, in particular brickworks, although these have declined.
- 4.21 The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. Published by Natural England<sup>1</sup>, the ALC provides a classification in 5 grades using a number of criteria including climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, micro-relief, flood risk) and soil (depth, structure, texture, chemicals, stoniness). The scales ranges from 1 (high quality) to 5 – poorest. This is shown for Warnham parish in Figure 4.6.
- 4.22 The NPPF (paragraph 112) states that relevant planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. The Horsham District Planning Framework Sustainability Appraisal suggests that where there are heavy clay soils, as in the Warnham parish, the land is likely to be of lower quality for agriculture with only a minimal amount of agricultural land that could fall into the 'best and most versatile' category.

<sup>1</sup> <http://publications.naturalengland.org.uk/file/4424325>



**Figure 4.6: Map of Agricultural land quality**

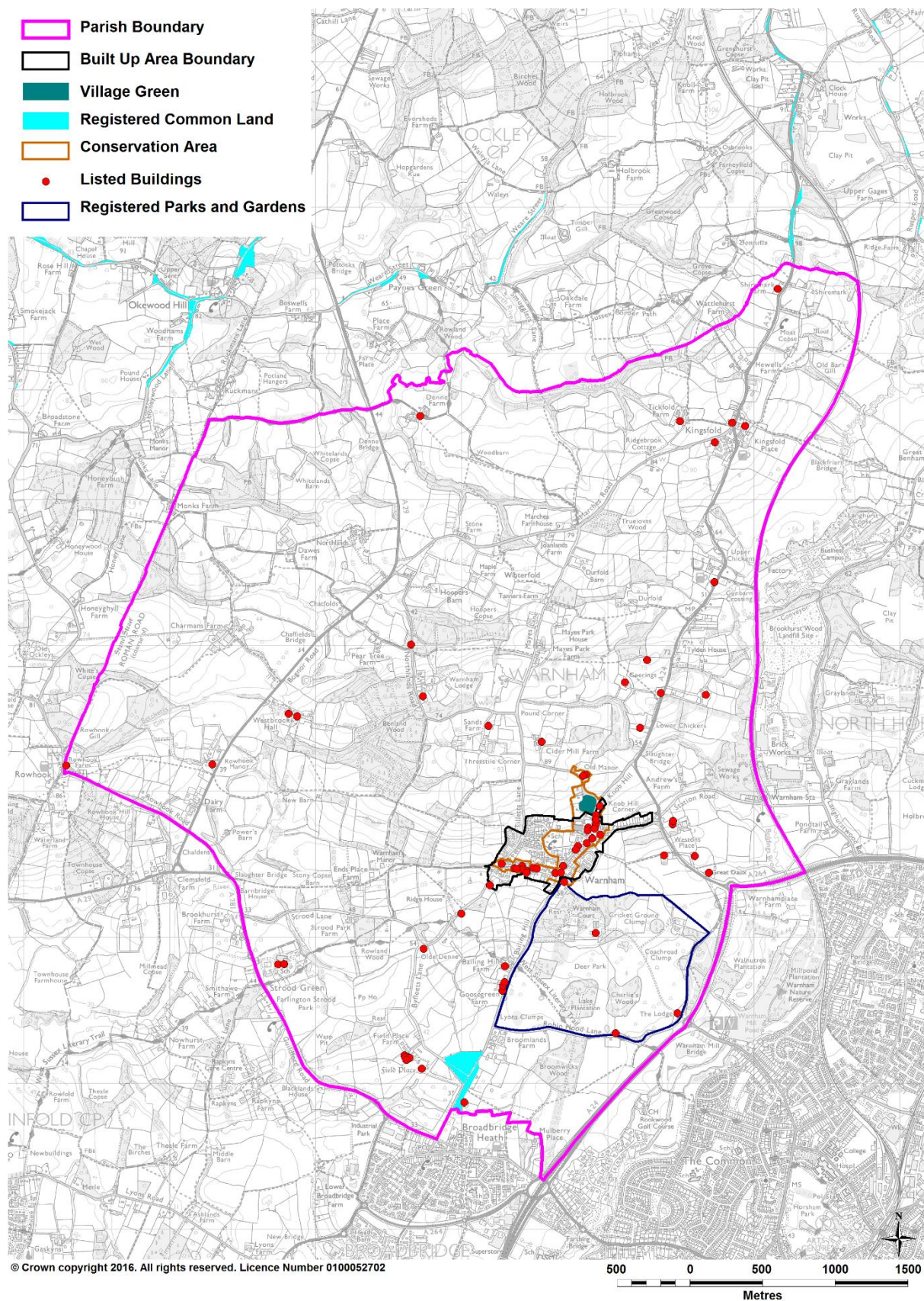




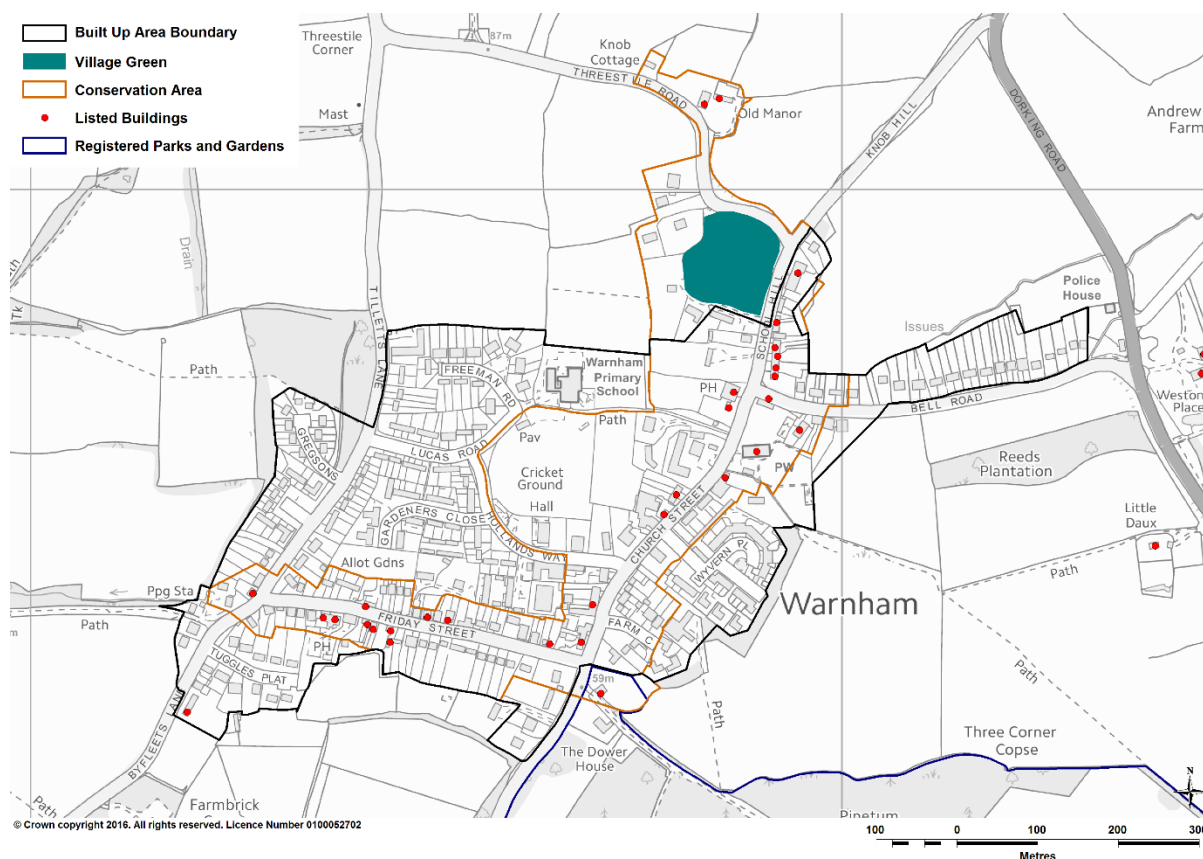
## Heritage

- 4.23 The Conservation Area, designated in 1983, covers the centre of Warnham village and includes Friday Street, Church Street and School Hill. It incorporates a varied and interesting range of buildings, both old and new, and the open spaces of the village green and the cricket field. The Conservation Area contains the majority of the 99 listed buildings including timber framed Wealden hall houses. The historic buildings are largely constructed of local materials – brick, stone and timber, often with cladding finishes of tiles, weatherboarding or render and roofed with local tile or Horsham stone flags.
- 4.24 Notable buildings in the parish include: Old Manor, Sands, Maltmayes, Westons, Tickfold Farm, Field Place, Warnham Lodge and Warnham Court. The latter is set within Warnham Park which is a privately owned Deer Park with an internationally famous herd of Red Deer renowned for producing superb antlers for over 100 years; and St Margaret's Church, a Grade 1 listed building dating to Norman times. Percy Bysshe Shelley was born at Field Place in 1792.
- 4.25 There are no scheduled ancient monuments in the parish and no sites are listed in Historic England's Heritage 'At Risk' Register.
- 4.26 A map of heritage assets is shown in Figure 4.7 (parish wide) and Figure 4.8 (Warnham village).

**Figure 4.7: Map of heritage features, parish wide**



**Figure 4.8: Map of heritage features, Warnham village**



## Air and noise

- 4.27 Generally air pollution in Horsham District is low with most emissions generated by road traffic. Air quality in the parish is not flagged as being poor and there are no Air Quality Management Areas. There are no areas of industrialisation in the parish which give rise to issues of air pollution. Road traffic air pollution is likely to rise with increasing traffic flows and there are two further sources of pollution which impact air quality in the parish. Adjacent to the east of the parish is land zoned for industrial use including waste processing and land fill. Wind-borne odours from the site have previously caused problems in the parish and any future industrial processes, including energy-from-waste, present a significant threat and will need control and monitoring. Air pollution from planes is within international standards but the threat of additional operations at Gatwick and changes to flight paths will increase air pollution pressure. The cumulative effects of pollution from multiple sources is key to impact assessments.
- 4.28 A major source of noise in the parish is from road traffic on the arterial roads (A264, A24 and A29). This impacts variably on residential areas according to atmospheric conditions.
- 4.29 The proximity of Gatwick Airport to the parish is a significant cause of noise disturbance. Improved aircraft engine design has reduced the noise levels from individual aircraft in recent years but this has largely been offset by an increase in the volume of flights. Any changes to flight paths or to aircraft operational procedure on arrival or departure are likely to exacerbate the problem. Flight path change trials in 2014, for example, caused extensive exposure to excessive noise levels over most of the parish and resulted in widespread public discontent. In the event that a second runway is constructed at Gatwick, noise levels and the areas affected by flight paths would increase

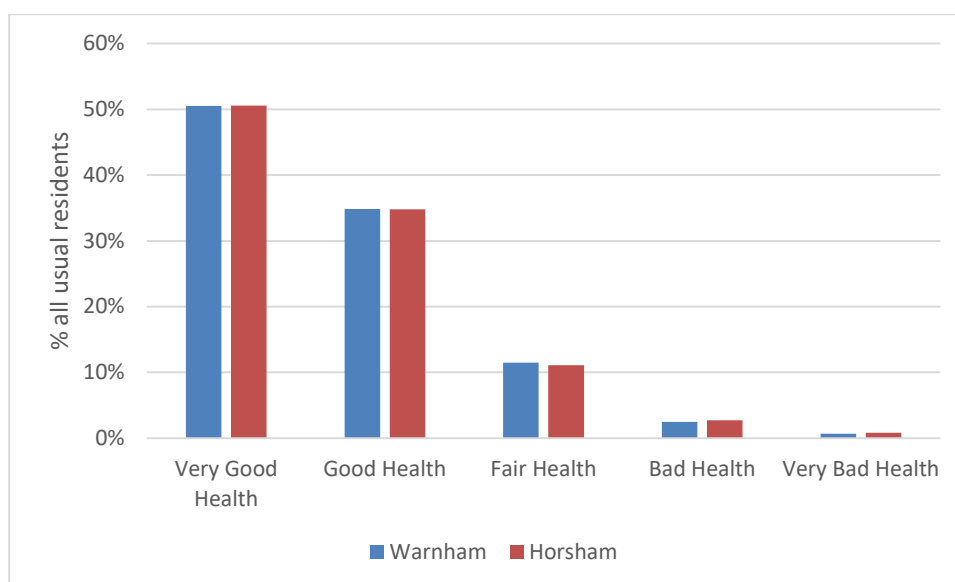


substantially. This would undoubtedly pose a major threat to the current relative tranquillity of the parish and could limit residential development potential.

## Human characteristics

- 4.30 Figure 4.9 shows that the general health of Warnham residents is good. The figures mirror those for Horsham District with 85% of residents experiencing 'good' or 'very good' health.

**Figure 4.9: General health, 2011**



Source: 2011 Census

## Roads and transport

- 4.31 There are two major routes running through the parish: the A24 which runs north-south at the eastern side, through Kingsfold and just east of Warnham village; and the A29 running north-south to the west of the parish. Along with some residential properties and businesses, Warnham railway station is situated beyond the A24 resulting in a degree of severance from Warnham village.
- 4.32 The local roads serving Warnham village and rural surrounds are small, rural routes that are inappropriate for carrying significant volumes of traffic. They are frequently used, however, as a short-cut for drivers in peak periods to avoid congestion on the surrounding strategic routes. A 20mph scheme in Warnham village has been put in place to help address this and there is a desire among locals to extend similar measures to other roads in the parish.

## Infrastructure

- 4.33 Warnham comprises Warnham village, categorised by Horsham District as a 'medium village', as well as numerous hamlets and smaller rural settlements. The parish has a number of community infrastructure assets, most of which are sited in the village of Warnham itself, including:
- A primary school
  - Four public houses
  - Village shops
  - A social club

- The Parish Church of St Margaret
- A village hall and parish room
- A dance studio
- Open spaces: the village green, cricketfield and playground. The butterfly reserve is on private land with no public right of way through it although a public footpath skirts its northern and western boundary.
- Allotments
- Railway station

## **Economic characteristics**

- 4.34 The 2011 Census recorded that the population of the Warnham parish was 2,068 persons, living in 874 households. Since 2001, the population has grown by 111 persons, or 6%. Comparatively, the Horsham population grew by 8%. Over the same period, the number of households grew by 67 (8%) in Warnham just over the 7% figure for Horsham. This number will reflect the number of new houses built over the decade and also possibly the sub-division of existing properties into multiple households.
- 4.35 The rate of population growth and rise in households is a little higher in comparison to the south east region as a whole which has seen an overall 8% rise in population and 5% rise in households.
- 4.36 A potential barrier for access to housing, particularly for first time buyers, is house prices – both in relative and absolute terms. In December 2014, the average price of a dwellings (all types) in the RH12 postcode area (covering Warnham and the surrounding rural areas) was £473,634<sup>2</sup>.

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<sup>2</sup> Source: [www.home.co.uk](http://www.home.co.uk)

## 5 KEY SUSTAINABILITY ISSUES

### SWOT analysis

- 5.1 Table 5.1 has been informed by the issues identified in the Neighbourhood Plan public workshops and consultation, and the baseline information collected in Section 4.

**Table 5.1: SWOT analysis of issues facing Warnham parish**

<p><b>Strengths</b></p> <p>Attractive and tranquil landscape setting, valued green spaces, red deer population, rare wildlife (especially woodland butterflies and birds), conservation area, heritage and local distinctiveness, strong community spirit, valued school, good range of community activities, clubs and societies, sports facilities, choice of pubs, friendly and well-attended church, access to nearby larger towns, allotments, low crime rate, local events and festivals, local shops and businesses, extensive rights of way network, hourly weekday bus to Dorking and Horsham, railway station,</p>	<p><b>Weaknesses</b></p> <p>Traffic speed and volume, car parking issues, rat-run routes, pedestrian vulnerability, lack of facilities/services in the more rural communities (eg Kingsfold), limited access to medical services, limited activities for younger and older children, high house prices, lack of affordable housing, concerns over school futures, aging population, lack of younger families, lack of high paid local employment, railway station remote from the main village, lack of parking at the station, lack of cycle routes between Warnham village, Kingsfold and Horsham, lack of affordable housing, A24 running through Kingsfold, lack of protection for and public engagement with rare wildlife</p>
<p><b>Opportunities</b></p> <p>Provide housing to serve local need, improve pedestrian safety, implement village traffic management, improve safety on A24, better balanced age distribution, improve contact and service to elderly, encourage use of renewable energy, encourage local businesses, expand/improve community activities, improve network and condition of footpaths, provide broadband connectivity for new dwellings and improve network speed for existing ones, provide cycle route to Horsham, opportunities for existing wildlife to flourish</p>	<p><b>Threats</b></p> <p>Climate change, loss of biodiversity, drought or water interruption/contamination, increased congestion, air pollution and danger from traffic on strategic roads, industrialisation in adjacent parishes, inappropriate development leading to loss of rural character, loss of agricultural land and local food self-sufficiency, impact of second runway at Gatwick/change to flightpaths, loss of local distinctiveness through cumulative loss of local vernacular, pressure on sewer system, threat from nearby developments, concerns about lack of supporting infrastructure, siting of developments, localised flooding due to inadequate drainage maintenance, most of the important wildlife sites are in private ownership</p>

### Key issues

- 5.2 There are a number of sustainability issues and challenges facing the parish. While Warnham parish offers a high quality environment to residents and local businesses, the Neighbourhood Plan will need to manage and seek to resolve a series of issues over its lifetime if the parish is to continue to be successful while respecting its outstanding landscape setting.

- 5.3 In the absence of a Neighbourhood Plan (and as a consequence a lack of vision and strategy for Warnham), there will be fewer opportunities to address the issues and challenges facing the parish, as well as contributing to a reduction in the potential benefit to the community.

**Table 5.2: Challenges and impacts of not having a neighbourhood plan**

Challenges facing Warnham Parish	Effect of not having a neighbourhood plan
Problem of traffic speed, volume and weight and lack of pedestrian/cyclist safety on the B-roads and rural lanes	Residents lives will be further blighted and safety will be worsened by traffic movements. Traffic congestion on local routes will continue and, in time, worsen
Viability of primary school	School roll reduces and therefore the schools face the threat of closure
Scale of housing growth	The District Plan does not require housing beyond the development boundary of Warnham village itself. This might result in unmet localised housing need in the parish.
Lack of affordable housing for parish residents	No suitable sites for housing for local people would be delivered
Supporting an ageing population	Potential issues of care/support/transport and a lack of local homes suitable for the needs of older people
Inadequate and potentially reducing public transport options	Increased dependence on the private car and increasing isolation for those unable to afford a car especially in more rural locations
Support and flexibility for local businesses	The needs of businesses to grow and change may be restricted by current rural policies
Infrastructure improvements such as roads, crossings, parking, community facilities	Funding for infrastructure requirements may not arise
Loss of agricultural land to development	Could result in unnecessary loss of agricultural land due to unplanned development coming forward through speculative applications
Ensuring access to services and facilities	Increased dependence on the private car to access services and inability to do so for those unable to afford a car
Need to maintain and enhance the high quality natural environment, wildlife networks and biodiversity of the parish	Could result in unnecessary impacts on biodiversity due to unplanned development coming forward through speculative applications
Development at highly visible or intrusive locations	Local assessments carry less weight
Need to protect and enhance the historic buildings and environment of the parish	Could result in unnecessary impacts on heritage assets due to unplanned development coming forward through speculative applications

## 6 THE SUSTAINABILITY APPRAISAL FRAMEWORK

6.1 A Sustainability Framework has been developed to assess the social, economic and environmental effects of the Plan through the identification of objectives and indicators.

6.2 The sustainability objectives and indicators have emerged through the following considerations:

- Through the review of documents listed in Appendix B
- As identified in the Baseline section
- To help address sustainability issues known locally
- To help address the 'weaknesses' outlined in the SWOT analysis

6.3 The Sustainability Framework is shown in Table 6.1:

**Table 6.1: Sustainability objectives and criteria for the Warnham Neighbourhood Plan**

Sustainability theme	Objectives	Criteria
1/Env	To preserve and enhance the natural beauty of Warnham in terms of its: <ul style="list-style-type: none"> <li>- geology, landform, water systems and climate</li> <li>- ancient woodlands</li> <li>- tranquillity</li> </ul>	<ul style="list-style-type: none"> <li>- Area of ancient woodland within the parish.</li> <li>- Number of developments in 'highly vulnerable' or 'more vulnerable' flood risk areas.</li> <li>- Loss of any of these features through grant of planning consent.</li> </ul>
2/Env	To protect and enhance the biodiversity of the parish, its wildlife habitats and species.	<ul style="list-style-type: none"> <li>- Area of habitats within the parish (data from Sussex Biodiversity Information)</li> <li>- Condition of ancient woodland in parish</li> <li>- Number of trees with TPOs.</li> <li>- Length of hedgerows in parish.</li> <li>- Variety of BAP species recorded</li> </ul>
3/Env	To protect the landscape setting of Warnham and focusing development on previously developed land	<ul style="list-style-type: none"> <li>- Development within areas assessed as low suitability.</li> <li>- Loss of views of value, including the conservation area and views of the hills to the north and west of Warnham.</li> <li>- Number of planning applications granted in areas with low landscape capacity.</li> <li>- Development on previously developed land.</li> </ul>
4/Soc	To ensure that housing addresses the needs of the existing community of Warnham before addressing wider needs	<ul style="list-style-type: none"> <li>- Mix of housing built by dwelling size.</li> <li>- Number of people with a local connection on the Housing Register that are newly housed.</li> <li>- Number of affordable homes completed.</li> </ul>
5/Econ	To maximise the potential of existing employment and support the needs of local employers.	<ul style="list-style-type: none"> <li>- Number of existing businesses retained.</li> <li>- Number of new businesses in the parish.</li> </ul>



Sustainability theme	Objectives	Criteria
		<ul style="list-style-type: none"> <li>- Number of local start-ups.</li> <li>- Data on employment levels.</li> <li>- Number of businesses and dwellings (for home workers) with access to superfast broadband.</li> </ul>
6/Env	To protect the identity and local distinctiveness of Warnham as a rural village and to enhance the village streetscape.	<ul style="list-style-type: none"> <li>- Number of listed buildings in built-up area.</li> <li>- Number of applications for listed building consent.</li> <li>- Number of developments within or adjacent to a Conservation Area.</li> <li>- Density of housing.</li> </ul>
7/Soc	To ensure that the community has a high quality and healthy lifestyle.	<ul style="list-style-type: none"> <li>- Census figures on long term illness and general health.</li> <li>- Number/area of green spaces within walking distance of homes.</li> <li>- Usage of formal green spaces within the parish.</li> <li>- Number of formal recreation facilities within walking distance of homes.</li> <li>- Number of homes experiencing unacceptable levels of noise.</li> </ul>
8/Soc	To improve safe movement around the parish and to key service centres outside the parish by a range of modes	<ul style="list-style-type: none"> <li>- Levels of traffic using the A24/A29</li> <li>- Levels of traffic using local roads around the village and wider parish.</li> <li>- Number and distance of new footpaths/cycle paths.</li> <li>- Speed data.</li> <li>- Accident data from police.</li> <li>- Number of safe crossing points across key routes</li> <li>- Number of public parking spaces.</li> </ul>
9/Soc	To ensure that the community has adequate access to the key utilities and services it needs, including health facilities, convenience shops, schools, broadband	<ul style="list-style-type: none"> <li>- Distance the population of the parish live from key services.</li> <li>- Availability of regular public transport.</li> <li>- Number of shops in settlements.</li> <li>- Speed of broadband services.</li> </ul>
10/Soc	To ensure the provision of a range of community leisure and recreation facilities that provide for the needs of the community	<ul style="list-style-type: none"> <li>- Number of community facilities within the parish, distinguished by target user age.</li> </ul>

## 7 SPATIAL GROWTH STRATEGY

- 7.1 An important consideration for Warnham has been both the level of housing growth that the parish might undertake and where this would be most sustainably located. Much effort has been made to determine what growth strategy is appropriate for Warnham, which will then underpin the remainder of the policies. There is an expectation that the parish will provide some housing during the lifespan of the Plan, primarily to meet locally defined needs, but also to contribute to the wider objectively assessed need of Horsham district. This section explores the following growth options:

**Scale Option 1:** No/limited growth

**Scale Option 2:** Growth in line with the recommendations of the Local Housing Needs Assessment

**Scale Option 3:** Growth exceeding the recommendations of the Local Housing Needs Assessment

- 7.2 It also considers the following options as to where any new housing might be sited, bearing in mind local issues and constraints to sustainable development:

**Siting Option 1:** Distribute housing on sites around the parish

**Siting Option 2:** Focus housing in Warnham village, within/adjacent to the built up area boundary

### Local growth context

- 7.3 Provision is made in the HDPF for the development of at least 16,000 homes across the district and associated infrastructure within the period 2011-2031, at an average of 800 homes per annum. This figure will be achieved by:

- Housing completions for the period 2011 – 2015.
- Housing that is either in the planning pipeline or is allocated in the development plan.
- Strategic Sites: a. At least 2,500 homes at Land North of Horsham; b. Around 600 homes at Land West of Southwater; c. Around 150 homes at Land South of Billingshurst.
- The provision of at least 1,500 homes throughout the district in accordance with the settlement hierarchy, allocated through Neighbourhood Planning.
- 750 windfall units.

- 7.4 In terms of the minimum 1,500 houses to be allocated via neighbourhood plans, Horsham District Council (HDC) does not allocate a definitive housing number to Warnham. Therefore an independent planning consultancy<sup>3</sup> was commissioned to undertake a Housing Needs Assessment (HNA) for Warnham to examine the potential 'unconstrained' number of dwellings that the Neighbourhood Plan might seek to accommodate. It did so by applying a series of assessments to determine possible housing need scenarios. The HNA considered four data sets as follows:

1. The Horsham District Planning Framework 'settlement hierarchy' minimum derived figure (HDPF) 2011-31
2. Housing Need in Horsham 2015 (SHMA), a proportional share drawn from an Objectively Assessed Need
3. DCLG Household projections
4. A projection derived from homes growth between 2001 and 2016.

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<sup>3</sup> Housing Needs Assessment; AECOM; November 2017

- 7.5 In addition, it applied a series of market signals to the data, for instance, migration in and out, employment trends and overcrowding which might also impact on the need for housing in the parish.
- 7.6 The datasets provide a range of housing numbers for Warnham's NDP, from **18 to 206** dwellings, to be delivered over the plan period. This is a wide range on which to base a Neighbourhood Plan and hence further interrogation of the assessments was warranted. For instance the assessments provide top-down 'unconstrained' figures and do not take into account the strategic planning policies which are likely to impact on Warnham; local environmental/historical constraints and site allocations; locally derived housing need; the local evidence provided by the community and other local stakeholders; or issues relating to the deliverable supply of sites and housing numbers overall.
- 7.7 These points have been explored in further detail to enable a fuller interpretation of figures in the separate report, 'Housing Needs Assessments - Determining an appropriate housing scale for Warnham', contained in Appendix D. A summary of the findings is presented below with an explanation as to how it impacts the sites assessments for the neighbourhood plan.

#### **Strategic planning policies of relevance to Warnham**

- 7.8 Policy 15 (4) of the HDPF sets out that at least 1,500 homes throughout the district in accordance with the settlement hierarchy, will be allocated through Neighbourhood Planning.
- 7.9 Policy 3 states that development will be permitted within towns and villages which have defined built-up areas. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement in accordance with the settlement hierarchy.
- 7.10 With the focus on sustainable development, Warnham village, with a built-up area boundary and classified as a medium village, is considered appropriate for limited infill development or extension. The rest of the parish, including Kingsfold, has no defined built-up area and housing in these areas, beyond limited infill is considered unsustainable.
- 7.11 Therefore sites put forward that are located in areas remote from the built-up area boundary (BUAB) are considered to be unsustainable and their development would therefore be inconsistent with the HDPF. This has been reflected in the site assessments.
- 7.12 In addition, a series of sites have not been allocated as they are considered to be of a strategic size, and as such inappropriate for allocation in the neighbourhood plan. These sites are not required to deliver the overall housing requirements of the HDPF and are considered to be inappropriate in scale as sites allocated to deliver predominantly local housing needs.

#### **Local environmental/ historical constraints and site allocations**

- 7.13 A number of sites that were submitted during the Call for Sites phase have already been granted planning permission – this includes the Glebe (within the BUAB) and a rural exception site. These sites are therefore no longer considered in the site assessment process.
- 7.14 With locations in and close to the BUAB of Warnham village being the sole reasonable location for sustainable development in the parish that addresses predominantly local needs, an important factor that needs to be taken into account is the potential impact on the local landscape. Warnham village itself is primarily sitting within a dip in the landscape, as illustrated in Figure 8.1, between Bailing Hill and Knob Hill. The visual impact of development needs to be taken into account therefore. This is in line with HDC 'Countryside Protection' Policy 26 which protects the countryside against inappropriate development unless it is considered to be appropriate in scale and essential.

The Tuggles Plat appeal hearing quoted this point<sup>4</sup>. This factor has implications for sites located around the village, in particular site WN03, Land north of Bell Road where development is assessed to have a possibly significant negative impact on the landscape setting and views from Bell Road and the public right of way (FP 1577). Although the site itself is flat, existing housing to the north of the site is at a lower level than Bell Road.

7.15 Therefore some existing housing, including listed properties, could be partially overlooked at the front of properties. Warnham village has developed within the constraints of surrounding hills. It is fundamental for development in the village to be sustainable in terms of visual impact that building should not encroach on the surrounding skyline. The site has similar characteristics (listed buildings and overlooking existing properties) to the Tuggles Plat site which was refused planning permission and a subsequent appeal dismissed. (Ref: APP/Z3825/W/16/3145622).



Rising topography along Bell Road, north,  
and listed properties to the boundary  
along School Hill



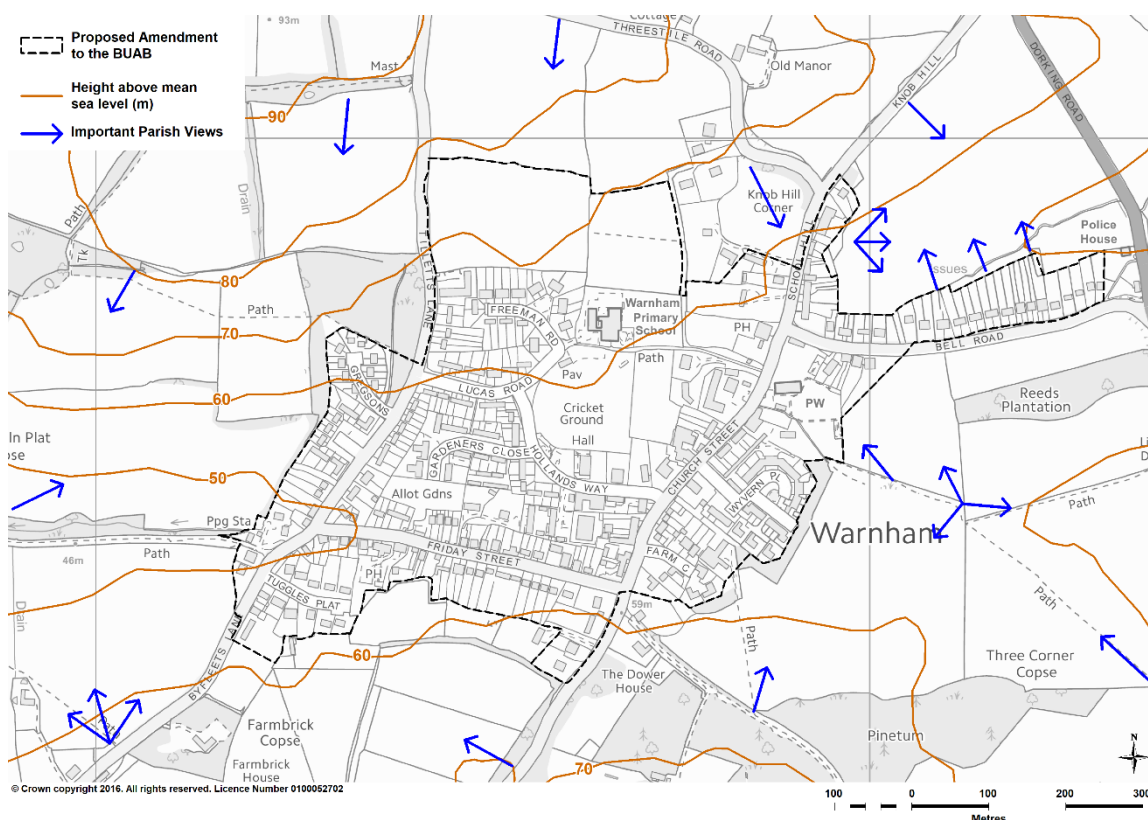
Similar rising topography at Tuggles Plat

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Appeal Ref: APP/Z3825/W/16/3145622 Land to the east of Tuggles Plat, Warnham, West Sussex

**Figure 7.1: Landscape topography and sightlines across the village**



7.16 The impact of development on local heritage is also a factor for a number of the available sites, including WN03 and again was reflected in the Tuggles Plat appeal. This is therefore reflected in the site assessments.

7.17 Finally, a number of sites lie close to important habitats and attractive, established woodland. WN 25 is a good example of where development would have a negative impact on local habitats and this has been reflected in the assessment.

### **Locally derived housing need**

7.18 A Local Housing Needs Survey for Warnham parish was undertaken by Action in Rural Sussex in 2015. It concluded that there is an unmet need for some affordable housing for those with a local connection to the parish. In particular it demonstrated a need for more dwellings in Warnham that are affordable, are suitable for those wishing to downsize, those looking for their first home, and those couples with growing families. At the time of the survey, it was recommended that **up to 15 units of affordable housing** would be most appropriate to develop during the lifespan of the NDP. This is in line with the figures derived from the HDC waiting list. At 20% to 35% affordable this would give an allocation to Warnham of **43 to 75** dwellings.

7.19 The Local Housing Needs Survey provides only a snapshot of housing need and therefore may need to be updated in the lifespan of the Neighbourhood Plan to reflect a changing picture of need.

### **The views of local people**

7.20 An important factor for the Neighbourhood Plan is taking into account the views of the community. The engagement process revealed that local people considered that development should not erode the character of the parish or the separation of the individual settlements, nor should it overstretch the infrastructure capacity of the parish.

### Issues relating to the supply side

- 7.21 The majority of sites that are in sustainable locations and which might be suitable for housing are owned by one landowner. Of the sites that were shortlisted, WN04, Bell Road South, was suitable and available for housing development. The landowner, however, only wishes to make the site available for larger, single plot sites, which is not in line with Policy W3 – Housing mix meeting local needs, which prioritises smaller dwellings for first time buyers and downsizers. Therefore, whilst there is potential for higher levels of development, this would have conflicted with key objectives of the NDP and could have significant negative effects.

### Conclusions on housing scale and sites

- 7.22 The NDP for Warnham seeks to provide a minimum of 50 new dwellings between 2016 and 2031. Table 7.1 sets provides a summary commentary against each of the growth options.

**Table 7.1: Commentary on options for scale of growth and siting**

Scale of growth options	Commentary
Scale Option 1 – no/limited growth	<p>There is an expectation that Neighbourhood Development Plans will contribute a minimum of 1,500 new dwellings across the district during the lifespan of the HDPF. In addition, there is an identified local need for housing in Warnham parish. It is therefore important that a certain level of housing provision is secured over the lifespan of the Plan, deeming a no/limited development option as both unsustainable.</p> <p>No provision could have a significant detrimental impact in terms of addressing the local housing needs of Warnham and providing smaller dwellings for first time buyers and downsizers.</p>
Scale Option 2 - Growth of around 50 dwellings (+/- 10%)	<p>The analysis of the Housing Needs Assessment and the related issues including land supply and environmental constraints indicate that provision of in the region of 50 additional dwellings would meet local needs over the course of the neighbourhood plan, while contributing to the wider strategic need. It would also enable the provision of a reasonable number of smaller dwellings for first time buyers and downsizers. There are sufficient sustainable sites to deliver this quantum of development. It is recognised, however, that an early review of the neighbourhood plan, to take into account the review of the HDPF, is likely to be necessary.</p>
Scale Option 3 - Growth exceeding 50 dwellings (+10% uplift)	<p>The datasets revealed by the Local Housing Needs Assessment include a potential higher housing need for the parish. The neighbourhood plan exercise has illustrated that the current availability of suitable sites</p>

	<p>does not enable additional housing significantly beyond that planned for in the Neighbourhood Plan to be delivered at this time. Beyond the site that has been allocated in the Plan, only one other site is suitable for development, however the type of dwellings put forward by the developer - larger, single plots - would not address the objectives of the Plan. This could have a significant detrimental impact in terms of addressing local housing needs, including the needs of first time buyers and downsizers for smaller properties.</p>
Preferred Scale of development: Growth of around 50 dwellings (+/- 10%)	
Siting options	Commentary
<p><b>Siting Option 1</b> – Distribute housing on sites around the parish</p>	<p>Warnham village is the only settlement within the parish that has a built up area boundary. It is also classified as a medium village, containing local services such as a primary school, village hall and shops. The HDPF directs development to settlements with built up area boundaries, unless it is of a very limited nature (i.e. infill of circa 5 homes).</p> <p>Within Warnham parish, the hamlets of Kingsfold, Winterfold, Northlands, Durfold, Station Road, Goosegreen and Rowhook are therefore deemed unsustainable locations to support allocations that will make a meaningful contribution towards achieving the scale of growth required the neighbourhood plan and to contribute towards achieving the other objectives of the Plan. Rather they are suited to limited infill or as rural exception sites.</p>
<p><b>Siting Option 2</b> – Focus housing in Warnham village, within/adjacent to the built up area boundary</p>	<p>The village of Warnham presents the most sustainable location for any new housing development, close to local amenities, footpaths and services. Focusing development in and around Warnham would also make a positive contribution to achieving the other objectives of the Plan, including:</p> <ul style="list-style-type: none"> <li>- Maintaining the rural character of the parish.</li> <li>- Protecting and enhancing the natural environment and tranquillity of the parish.</li> <li>- Encouraging cycling, walking and public transport services.</li> <li>- Addressing traffic and parking issues in the parish.</li> <li>- Maintaining and fostering Warnham's community spirit.</li> </ul>

Preferred Siting of residential development: Focus housing in Warnham village, within/adjacent to the built up area boundary

- 7.23 The scale of housing provision is set out in Policy W2 and the site allocation is set out in Policy W6. Together these will enable the fulfilment of the required affordable housing with the minimum market housing.
- 7.24 The HDPF Examiner recommended that a review of the HDPF should commence within three years, which when complete will require the subsequent review of the WNDP.



## 8 ASSESSMENT OF NEIGHBOURHOOD PLAN POLICIES

- 8.1 Bearing in mind the overarching Growth Strategy for Warnham, this section of the report considers each Neighbourhood Plan policy and a number of alternative options in order to determine the most sustainable option for each policy area. It also includes information about likely future changes that will occur even without a new Neighbourhood Plan. These alternative options are assessed against the Sustainability Framework in order to determine which option is the most sustainable. This will be used to inform the drafting of the Neighbourhood Plan in order to make sure it is the most sustainable plan possible, given all realistic alternatives.
- 8.2 As the Neighbourhood Plan has developed, the strategy and policies have been tested against these sustainability objectives, to identify appropriate policies for inclusion in the Plan.
- 8.3 Realistic policy options have been appraised against the Sustainability Objectives in order to ensure that the policies chosen for the Neighbourhood Plan are sustainable.
- 8.4 The following symbols have been used to record the impact of each option against each objective:

++	Significant positive impact on sustainability objective
+	Positive impact on sustainability objective
+	Possible positive impact or slight positive impact on sustainability objective
0	No impact or neutral impact on sustainability objective
-?	Possible negative impact or slight negative impact on sustainability objective
-	Negative impact on sustainability objective
--	Significant negative impact on sustainability objective

- 8.5 In the tables below, 'HDPF' means the 'Horsham District Planning Framework 2015'.

Assessment of Neighbourhood Plan policy options										
Policy W1 – Built-Up Area Boundary										
<b>Policy Options:</b> Option A: To have an NP policy that directs where the bulk of development will be located. Option B: To have no NP policy, covered by HDPF Policies 3, 4 and 27.										
Policy Options	1/Env – Cside/ natural beauty	2/Env – Biodiversity	3/Env – Landscape setting	4/Soc - Housing	5/Econ - Employment	6/Env – Heritage/ streetscape	7/Soc - Health	8/Soc – Movement	9/Soc –Utilities/ Services	10/Soc – Recreation
A	+	0	+	+	+	0	0	+	0	0
B	0	0	-	0	0	0	0	0	-	
<b>Preferred Policy Option:</b>				<b>A</b>						
<b>Summary and conclusion:</b> Given the limited scale of available sites within the existing built Up Area Boundary, Option A expands the boundary through the identification of a site that provides the opportunity to address both local housing needs and contribute to the wider strategic need. Option A scores more positively against objectives 1, 3, 4, 5, and 8 largely because of the opportunities that the new development strategy would create to address these objectives in a positive, well-planned manner. By concentrating development adjacent to the existing built Up Area Boundary, and extending the boundary to reflect this, landscape and biodiversity would be broadly protected. It also enables greater use of sustainable transport methods which could in turn lessen the impact of car transport which has been raised as a concern locally.										

Assessment of Neighbourhood Plan policy options										
Policy W2 – Scale of Housing Provision										
<b>Policy Options:</b> Option A: To have an NP policy that identifies the appropriate scale of housing for Warnham and the site on which this will be located. Option B: To have no NP policy, covered by HDPF Policies 2 and 15.										
Policy Options	1/Env – Cside/ natural beauty	2/Env – Biodiversity	3/Env – Landscape setting	4/Soc - Housing	5/Econ - Employment	6/Env – Heritage/ streetscape	7/Soc - Health	8/Soc – Movement	9/Soc – Utilities/ services	10/Soc Recreation
A	-?	-?	-?	++	0	0	0	+	0	+
B	0	0	-?	+	0	0	+	0	0	+
<b>Preferred Policy Option:</b>				<b>A</b>						
<b>Summary and conclusion:</b> Section 7 of the report set out a detailed analysis of how the growth strategy for Warnham parish has been determined. In terms of reflecting this in a neighbourhood plan policy, given the limited number of available and suitable sites within the existing built up area boundary, Option A provides for around 50 additional dwellings to meet both locally determined needs while contributing the wider strategic housing need for the district. It identifies a site that provides the opportunity to address this housing need in a sustainable way. Option A is assessed to have a slight negative impact on the environment, biodiversity and landscape setting. The site allocation itself provides criteria to help mitigate this, for instance incorporating landscaping, retaining an existing mature hedgerow and creating additional walking routes to link to the existing network.										

Assessment of Neighbourhood Plan policy options										
Policy W3 – Housing mix – meeting local needs										
<b>Policy Options:</b> Option A: To have an NP policy which seeks to ensure that development provides a mix of dwellings tailored to the needs of Warnham parish Option B: To have no NP policy, relying instead on HDPF Policy 16										
Policy Options	1/Env – Cside/ natural beauty	2/Env – Biodiversity	3/Env – Landscape setting	4/Soc - Housing	5/Econ - Employment	6/Env – Heritage/ streetscape	7/Soc - Health	8/Soc – Movement	9/Soc – Utilities/ Services	10/Soc - Recreation
A	0	0	0	++	0	0	0	0	+	+
B	0	0	0	+	0	0	0	0	0	0
<b>Preferred Policy Option:</b>				<b>A</b>						
<b>Summary and conclusion:</b> The purpose of this policy is to ensure that any new dwellings in Warnham parish serve the evidenced local housing need. The alternative approach would be to rely on the HDPF housing mix. Option B, whilst this would deliver a broad housing mix, would not be as tailored to local need as Option A.. Having a local policy ensures that the identified housing needs of Warnham are specifically delivered. No negative sustainability impacts are expected to result from this policy										

Assessment of Neighbourhood Plan policy options										
Policy W4 – Dwellings appropriate for the needs of older people										
<b>Policy Options:</b> Option A: To have an NP policy which seeks to ensure that development provides a greater proportion of the dwellings suitable for older people, addressing an evidenced need in Warnham. Option B: To have no NP policy, relying instead on HDPF Policy 16										
Policy Options	1/Env – Cside/ natural beauty	2/Env – Biodiversity	3/Env – Landscape setting	4/Soc - Housing	5/Econ - Employment	6/Env – Heritage/ landscape	7/Soc - Health	8/Soc – Movement	9/Soc – Utilities/ Services	10/Soc – Recreation
A	0	0	0	++	0	0	++	0	0	0
B	0	0	0	+	0	0	0	0	0	0
<b>Preferred Policy Option:</b>				<b>A</b>						
<b>Summary and conclusion:</b> The Local Housing Needs Assessment revealed a need to target a proportion of new housing to older people, bearing in mind their specific requirements. Warnham has a growing ageing population and this policy will help to ensure that suitable housing is provided across the area to address the specific needs of this group. Option A seeks to do this and there are no anticipated negative sustainability impacts that are expected to result from this. Indeed having a local policy ensures that the identified housing needs of Warnham are specifically delivered. Option B would mean relying on HDPF 16.										

Assessment of Neighbourhood Plan policy options										
Policy W5 – Design of residential development										
<b>Policy Options:</b> Option A: To have an NP policy which identifies the key considerations in designing quality development that is in-keeping with the character of Warnham. Option B: To have no NP policy, relying instead on HDPF Policies 32 and 33.										
Policy Options	1/Env – Cside/ natural beauty	2/Env – Biodiversity	3/Env – Landscape setting	4/Soc - Housing	5/Econ - Employment	6/Env – Heritage/ streetscape	7/Soc - Health	8/Soc – Movement	9/Soc – Utilities/ services	10/Soc – Recreation
A	0	0	+	+	0	++	+	0	+	0
B	0	0	-	+	0	+	0	0	0	0
<b>Preferred Policy Option:</b>				<b>A</b>						
<b>Summary and conclusion:</b> In a rural, historic parish such as Warnham, the design of any new build is important in order that the nature and character of the area is not eroded. Whilst the HDPF includes a policy about design, Option A here enables greater detail, locally specific to Warnham, to be applied. For instance, the inclusion of this policy will support the delivery of better connected walking and cycling routes in Warnham as well as enabling greater access to open space for residents. It also seeks to ensure that the topography of the village setting is not compromised as a result of development. There are no anticipated negative sustainability impacts expected to result from this policy. Having a local policy emphasises that good design is key in achieving social, environmental and economic aims.										

Assessment of Neighbourhood Plan policy options
<b>W6: Site Allocation Policies –Housing Site Allocations</b>
<p><b>Policy Options:</b></p> <p>Based on the overarching growth strategy for Warnham, set out in Section 7 of this report, and underpinned by policies W1 and W2, this policy explores the options to allocate any one or a combination of Site Options. This would address the housing needs of Warnham and contribute towards the wider housing needs of Horsham district. A full list of all sites, with assessments, can be found in the Site Assessment Report<sup>5</sup>. A summary of the site assessments is provided below, including a commentary about how it impacts on the Sustainability Framework. A conclusion is provided after this.</p>

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<sup>5</sup> Insert link to site assessment report



Site Name/ Ref	Sustainability Objectives										Summary of appraisal
	1	2	3	4	5	6	7	8	9	10	
WN01 Land at Upper Westbrook Farm	-	-	-	+	0	--	0	0	--	--	This greenfield site is situated in a rural area, remote from local facilities and public transport route, lying outside the built up area boundary. It is situated on Grade 4 agricultural land rated poor. The site has a narrow private drive and bridge from A29 and would need widening to service the site. Visibility on to the A29 is limited. The Steering Group has assessed access from A29 as difficult. It has been recommended as Not Developable in the SHELAA as it is not located in a sustainable location.
WN02 Land at Rowhook Hill	-	-	-	+	0	--	0	0	--	--	This greenfield site is situated in a rural area to the south-western edge of the neighbourhood area. It is remote from local facilities and public transport route, lying outside the built up area boundary. Access from the A29 is difficult. It has been recommended as Not Developable in the SHELAA as it is not located in a sustainable location.
WN03 Bell Road, north	-?	0	-	+	0	-	0	0	+	0	This is a fairly large greenfield site adjoining the BUAB, hence it is located close to local facilities, walking routes and public transport. The site can be accessed directly from Bell Road. There are a number of listed buildings around the edge of the site. In addition, there is a concern about the impact development here would have on the landscape setting and views from Bell Road and FP 1577 as, although the site itself is flat, existing housing to the north of the site is at a lower level than Bell Road. Therefore some exiting housing, including listed properties, could be partially overlooked at the front of properties. Warnham village has developed within the constraints of surrounding hills. It is fundamental for development in the village to be sustainable in terms of visual impact: that building should not encroach on the surrounding skyline. The site has similar characteristics (Listed Buildings and overlooking existing properties) to the Tuggles Plat site which was refused and an appeal dismissed. (Ref: APP/Z3825/W/16/3145622
WN04 Bell Road, south	-?	0	0	-?	0	+	0	+	+	+	This greenfield site has defensible boundaries and adjoins the village BUAB. It is mainly flat and accessed directly from Bell Road and hence has limited infrastructure needs. Development would have acceptable

Site Name/ Ref	Sustainability Objectives										Summary of appraisal
	1	2	3	4	5	6	7	8	9	10	
											visual and environmental impact. Existing housing to the north of the site is at a level lower than Bell Road. In this respect some existing housing could be partially overlooked at the front of properties but the distance to new housing and potential planting will limit this effect. The site owner has expressed an interest in developing large homes on sizeable plots which does not meet the policy requirement for a mix of mainly smaller dwellings.
WN05/ WN19 Warnham Glebe land	n/a										This site has now been granted planning permission.
WN06 Land at Westons Farm	-?	0	-	+	0	-?	0	-	0	0	This greenfield site is close to the village although not within or adjacent to the BUAB as it is severed from it by the A24. Access would be from A24 at a location with poor alignment and visibility, and a high incidence of traffic accidents. There are some listed buildings on the edge of the site. Warnham village has developed within the constraints of surrounding hills. It is fundamental for development in the village to be sustainable in terms of visual impact: that building should not encroach on the surrounding skyline. This was reinforced by the recent appeal decision at Tuggles Plat. The SHELAA assesses the site as not currently developable.
WN07 Land from Knob Hill to A24	-	-	-	+	0	-	0	0	0	0	The site is extensive and incorporates WN03. The site adjoins the village BUAB and hence has potential but the site topography would result in existing properties, including many listed buildings, being overlooked. Significant visual impact of development. Local opposition to the site. SHELAA assesses the site as too large for development on the village boundary.
WN08/ WN15 Land at Northlands Cottages	n/a										This site has now been granted planning permission (DC/16/2401).
WN09 Land east of Kingsfold	-	-	-	+	0	0	0	0	0	0	This greenfield site is in a rural part of the parish remote from facilities and therefore deemed unsustainable. It is a very extensive tract of land and development would have a significant impact on the landscape, environment. The scale of the potential development is

Site Name/ Ref	Sustainability Objectives										Summary of appraisal
	1	2	3	4	5	6	7	8	9	10	
											beyond that appropriate for consideration in the NDP. SHELLA: Not Currently Developable.
WN10 Land at Kingsfold nursery	n/a										This site has already received planning permission for industrial use.
WN11 Land north-west of Horsham	-	-	-	++	0	0	0	-?	0	0	The site is very extensive, from Gt. Daux, Warnham to Capel, Surrey with the ability to provide 5000 housing units. It would have a significant impact on the district, landscape, environment, and local infrastructure including the A24 The scale of the potential development is beyond that appropriate for consideration in the NDP and the SHELAA has assessed it as not currently developable.
WN12 The Dog and Duck	-	-	-	+	0	0	0	0	--	--	The site is large and in a rural area remote from facilities, and therefore deemed unsustainable. Access from A24 would be at a location with limited visibility. There is a Listed Building adjacent to the site and biodiversity impacts have been rated red because of a national designation and significant local species/habitats The SHELAA assesses the site as not currently developable.
WN13 Land at Tickfold Farm	-	-	-	+	0	0	0	0	--	--	This greenfield site is very large and beyond the scope of the neighbourhood plan to the north of the current residential limit of Kingsfold. It is remote from the BUAB and hence local facilities and is an unsustainable location for development. The site would need additional access arrangements from the A24.
WN14 Land at Pitswood, Byfleets Lane	0	0	0	++	0	0	0	-?	--	--	The site adjoins a small group of houses and cottages. It was previously in residential curtilage. Three small low-cost private sector units are proposed as a rural exception site which could meet an identified NDP housing need. It is however remote from facilities and hence an unsustainable location. Whilst there is local support for some small-scale developments outside the village, the site is assessed as unsuitable unless it were to come forward as a rural exception site, for which there is already provision in the HDPF.
WN16 The Eagles, Kingsfold	0	0	0	+	0	0	0	-?	--	--	The site is large and within the built curtilage of Kingsfold, but it is remote from facilities and therefore unsustainable. The land is behind existing housing and has an access problem which could require the

Site Name/ Ref	Sustainability Objectives										Summary of appraisal
	1	2	3	4	5	6	7	8	9	10	
											(part) demolition of a listed building. Access would be onto the accident-prone junction of Marches Road and the A24.
WN17 Land north of Pryors Wood, Kingsfold	0	0	0	+	0	0	0	-?	--	--	The site is large and would need a new access onto the A24 in Kingsfold. The site is remote from the BUAB and local facilities and is therefore unsustainable. Development at the site would increase the number of pedestrians crossing the A24.
WN18 Land Land north of Pryors Wood, Kingsfold (extended site)	0	0	0	+	0	0	0	-?	--	--	The site is extensive and incorporates WN17. It is remote from the BUAB and local facilities and therefore deemed unsustainable. Its development would have a significant impact on the existing development of Kingsfold and additional traffic volumes on the A24.
WN19 Warnham Glebe land	Undeliverable										See WN05. WN 19 excluded the access to Church Street and was land-locked.
WN20 Land at Single Cross (1)	-	0	0	+	0	0	0	--	--	--	The site is located in the garden of Single Cross, School Hill, and suitable for two properties. The site is outside the village BUAB and within the Conservation Area. It is remote from the public road and would need access across the village green.
WN21 Land at Single Cross (2)	-	0	0	+	0	0	0	--	--	--	The site is located in the garden of Single Cross, School Hill, and suitable for two properties. The site is outside the village BUAB and within the Conservation Area. The site is remote from the public road and would need access across the village green.
WN21 Land at Field Place Farm	-	-	-	+	0	0	0	0	--	--	The site is remote from the BUAB, located on the built boundary of Broadbridge Heath. The site is mainly woodland, part of an extensive agricultural property. Development of the site would be intrusive to the rural boundaries. The adjacent land use in Broadbridge Heath is an industrial estate. The site is at an unsustainable distance from Warnham facilities and its development would be related to the Broadbridge Heath facilities.
WN23 Land north of Freeman Road (incorporating WN24)	-?	0	0	++	0	0	0	++	+	+	This is a large greenfield site located adjacent to the village BUAB. The topography is sloping but development would not be overly intrusive and would not intrude over the horizon of rising ground to the north. The site is contained by an established hedge to the north. Impact on landscape and environment would be acceptable. Following advice from the Highways Authority (West Sussex County Council), access

Site Name/ Ref	Sustainability Objectives										Summary of appraisal
	1	2	3	4	5	6	7	8	9	10	
											<p>would be from Tilletts Lane, as proposed by WSCC, together with a change of priority at the Tilletts Lane/Threestile Road junction to encourage traffic to leave the site and travel northbound to the A24 and A29 rather than to travel southbound and add to the well-used village centre roads. There could be an option to provide a short connection from the site due east to Threestile Road, but this is dependent on the landowner funding this.</p> <p>To the south of the site boundary is the only parish football field and development of this site would enable the provision of a buffer zone between it and the football pitch to accommodate visitors and spectators to football matches.</p> <p>The site would bring forward a new footpath across the site, linking to the existing footpath network: paths 1428 and/or 1429 and 1430, adjacent to the established hedgerows, and Tilletts Lane.</p>
WN24 Land north of Warnham School (see WN23 as now amalgamated with WN23 into one site)	n/a										
WN25 Land north of Gregsons	-	-	-	+	0	0	0	0	0	0	<p>This is a greenfield site is adjacent to the village BUAB and to established affordable housing, Gregsons. It does not have any highway access from Gregsons however, therefore access would need to be via Tilletts Lane but would need the clearance of some attractive woodland. The site was agricultural but has been unworked for many years and is now covered in scrub and self-seeded, uncultivated trees. FP 1428 forms the southern boundary to the site and development of the site would impact severely on the attractiveness of the well-used footpath. The village butterfly reserve is to the north of the site and site is increasingly attractive to nesting birds and other wildlife. Development would have a significant landscape and environmental impact.</p>
WN26 Land east of Tuggles Plat	0	0	-	+	0	0	0	0	+	0	<p>The site is adjacent to the BUAB, near to local services and facilities, and abuts the Conservation Area as well as several listed buildings. It is, however, in an elevated position and development housing would have a dominant view over existing properties in Friday Street, and</p>



Site Name/ Ref	Sustainability Objectives										Summary of appraisal
	1	2	3	4	5	6	7	8	9	10	
											would impact distant views of the village from vantage points on high ground. The site was refused planning permission (DC/15/2680) and a subsequent (November 2016) appeal was dismissed.
WN27 Land south east of Kingsfold	-	-	--	+	0	0	0	0	0	0	The site is large and in a rural area remote from facilities, and therefore deemed unsustainable. It is very extensive and would have a significant impact on the landscape, environment and local infrastructure, including the A24. The location is unsustainable and the scale of the potential development is beyond that appropriate for consideration in the NDP. The SHELAA assesses the site as not currently developable.
WN28 Land at Brookhouse Farm, Kingsfold	-	-	--	+	0	0	0	0	0	0	The site is large and in a rural area remote from facilities, and therefore deemed unsustainable. It is very extensive and development would have a significant impact on the landscape, environment, the Marches Road/A24 junction and HDC's Planning Framework. The scale of the potential development is beyond that appropriate for consideration in the NDP. The SHELAA assesses the not currently developable.
WN29 - Land South East of Kingsfold (2)	-	-	--	+	0	0	0	0	0	0	The site is part of WN27. The site, located on Grade 3 agricultural land, is large and in a rural area remote from facilities, and therefore deemed unsustainable. It would have a significant impact on the landscape and environment. Development plans have been exhibited showing 60 units and facilities contributing towards making the site sustainable but there is no primary school. Kingsfold does not have a BUAB and hence the potential development is inappropriate for consideration in the NDP.
WN30 - Land North of Warnham Station	0	0	-	+	0	0	0	0	0	0	The site has previously been used as a bus depot and is put forward for employment use. The site has flooding constraints and poor linkage to the A24 and road improvement may be needed. The road is also a PRoW without a footpath. The site is unsustainable for residential use.  The site may be suitable to provide limited car parking at the station. SHELAA: Not Currently Developable.

Site Name/ Ref	Sustainability Objectives										Summary of appraisal
	1	2	3	4	5	6	7	8	9	10	
WN31 - Land north of Friday Street, accessed from Gardeners Close	0	0	0	+	0	0	0	0	-?	0	Land currently used as allotment. Land owned by HDC with renewable lease to Warnham Allotments Association. HDC confirm that any move to develop the site would fall under the terms of Policy 43 of the Horsham District Planning Framework and, as such, HDC would be required to source an alternative site of equal size and quality. Alternative sites are not currently available and the site is not currently available.

Preferred Policy Option:	Allocate Site Option (WN23)
<p><b>Summary and conclusion:</b></p> <p>Many of the sites assessed are not within/adjacent to the built up area boundary of Warnham village, which is assessed as the most suitable location for new development at the scale anticipated. As set out in Section 7 of this document, the smaller 'unclassified' settlements of Kingsfold, Winterfold, Northlands, Durfold, Station Road, Goosegreen and Rowhook are unsustainable for housing of a scale above limited infill or as rural exception sites. This assessment conforms to Policies 3 and 4 of the HDPF.</p> <p>Of the remaining 'village' sites, the following are assessed as being most sustainable and further commentary is provided below:</p> <p>Site (WN03) Bell Road North, offers many positive benefits, being located close to the village centre and therefore local facilities. However, because the site is at a lower level than Bell Road itself, some exiting housing to the north could be partially overlooked at the front of properties. On this point, it should be noted that Warnham village has developed within the constraints of its surrounding hills; it is fundamental for development in the village to be sustainable in terms of visual impact, i.e. that building should not encroach on the surrounding skyline. This was reinforced by the recent appeal decision at Tuggles Plat. This site is therefore assessed to be unsustainable for development.</p> <p>Site (WNO4) Bell Road South, offers many positive benefits across the themes, being located adjacent to the BUAB and with very limited environmental constraints. The landowner, however, has expressed an interest in developing larger single plot properties which would not deliver the mix of housing identified as required in the parish. This site is therefore not pursued in the neighbourhood plan.</p> <p>Site (WN23) North of Freeman Road, has strong positive benefits across several themes and would deliver a mix of housing in line with the wider neighbourhood plan policies. It is located close to the village centre, with easy access to local facilities including the school, the shops, the village hall and recreation opportunities, which would assist in mitigating car use. Additionally, the site would enable a new footpath link to be created that would link to the existing network. Whilst there are potential negative impacts on the landscape, by way of its greenfield status and the inevitable impact any development would have on this, the topology of the land would not be detrimental to the views across the village. The site is located adjacent to the parish's only football field and development would provide a buffer zone to the north which</p>	

Preferred Policy Option:	Allocate Site Option (WN23)
<p>could ameliorate the facility for visitors and spectators. The Highways Authority has suggested that the site would not result in undue traffic congestion and that access could be achieved via Threestile Road.</p> <p>The analysis leads to the conclusion that Site (WN23) North of Freeman Road is suitable for allocation in the neighbourhood plan and is of a sufficient size to deliver the scale of housing noted in the overarching growth strategy for the parish.</p> <p>All residential site allocations would need to ensure that appropriate levels of open space are required to adequately provide for the needs of users such as dog walkers, in order to ensure no adverse impacts on European designated sites in the wider area.</p>	

Assessment of Neighbourhood Plan policy options										
Policy W7 – Protection of existing commercial premises or land										
<b>Policy Options:</b> Option A: To have an NP policy that seeks to protect against the loss of commercial premises or land which provides employment. Option B: To have no NP policy, instead relying on HDPF Policy 7. Option C: To have an NP policy that seeks to allocate additional employment land.										
Policy Options	1/Env – Cside/ natural beauty	2/Env – Biodiversity	3/Env – Landscape setting	4/Soc - Housing	5/Econ - Employment	6/Env –Heritage / distinctiveness	7/Soc - Health	8/Soc – Movement	9/Soc – Utilities services	10/Soc – Recreation
A	0	0	0	0	++	0	0	+	+	0
B	0	0	0	0	+	0	0	0	0	0
C	-?	-?	-?	0	++	0	0	+	+	0
<b>Preferred Policy Option:</b>				<b>A</b>						
<b>Summary and conclusion:</b> Given Warnham’s proximity to larger employment bases nearby, including Horsham, Crawley and Gatwick, it is important that existing local employment opportunities are particularly safeguard against loss or relocation. This is particularly the case in light of the new housing planned in the parish, where local employment opportunities will help to reduce out-commuting and the negative environmental and social impacts associated with this. Option A provides positive economic sustainability, particularly in conjunction with the housing allocation. It would potentially enable fewer car movements to alternative sites outside the parish, as well as offering additional services locally, depending on the nature of the commercial activity. With Option B, whilst the HDPF includes a broad employment policy, it specifically refers to neighbourhood plans to provide further detail at the parish level. Option C would support additional growth of employment land. No suitable sites, however, were submitted to the neighbourhood plan that would have enabled this option, therefore the NP could not allocate specific employment sites. This could be an area re-explored as part of the early review of the neighbourhood plan, to determine if new opportunities have arisen. This option would have positive impacts on the local economy, however allocating new sites for employment could be detrimental to the environment and landscape setting, depending on where those sites might be. There are no negative sustainability impacts predicted as a result of this policy.										

Assessment of Neighbourhood Plan policy options										
Policy W8 – Public car parking										
<b>Policy Options:</b> Option A: To have an NP policy which safeguards against the loss of publicly accessible car parking in Warnham, in particular near to Warnham Station, as well as requiring cycle parking facilities. Option B: To have no NP policy, relying instead on HDPF Policy 41										
Policy Options	1/Env – Cside/ natural beauty	2/Env – Biodiversity	3/Env – Landscape setting	4/Soc - Housing	5/Econ - Employment	6/Env Heritage/ distinctiveness	7/Soc - Health	8/Soc – Movement	9/Soc –Utilities/ Services	10/Soc – Recreation
A	0	0	0	0	+	0	+	++	0	+
B	0	0	0	0	0	0	0	-?	0	0
<b>Preferred Policy Option:</b>				<b>A</b>						
<b>Summary and conclusion:</b> Warnham’s rural nature inevitably means that there is a greater reliance on car traffic. Whilst policy W7 seeks to encourage greater non-car movements, an increase in housing is likely to result in more cars in the parish. This policy seeks to minimise the congestion causes by those vehicles in the parish, by safeguarding existing public car parking. In addition, by encouraging dedicated car parking next to Warnham station, it is envisaged that greater numbers of working residents will opt to use the train to reach their place of work as opposed to driving. The station itself is cut off from Warnham Village and the smaller settlements by the A24 and pedestrian access across this is unlikely because of the costs involved. The policy does however seek to enhance cycle provision at the station for those wishing to access it using this form of transport. Option A is assessed to be more suitable than Option B as it provides locally specific detail.										



Assessment of Neighbourhood Plan policy options										
Policy W9 – Parking standards for new residential development										
<b>Policy Options:</b> Option A: To have an NP policy which requires the provision of the minimum number of off-road parking spaces for new dwellings. Option B: To have no NP policy, relying instead on HDPF Policy 41										
Policy Options	1/Env – Cside/ natural beauty	2/Env – Biodiversity	3/Env – Landscape setting	4/Soc – Housing	5/Econ - Employment	6/Env – Heritage/ distinctiveness	7/Soc - Health	8/Soc – Movement	9/Soc – Utilities/ services	10/Soc – Recreation
A	0	0	0	0	0	+	0	++	0	0
B	0	0	0	0	0	0	0	++	0	0
<b>Preferred Policy Option:</b>				<b>A</b>						
<b>Summary and conclusion:</b> Because of the rural nature of Warnham, car ownership is well above average compared with the district and the south east. Historically, the style of buildings in Warnham have not lent themselves to off-road parking, which has increased traffic congestion as well as impacting negatively on the character of the area. By ensuring that the minimum numbers of car parking spaces are required, off-road, for new dwellings, the policy will address a social need and contribute towards improving the local streetscape setting of Warnham. Option A is assessed as more suitable than Option B as it is more locally specific.										

## Cumulative effects of Neighbourhood Plan policies

- 8.6 Cumulatively the plan is likely to make a positive contribution to housing, economic development and community. However there are also likely to be some cumulative negative effects. A summary of the likely impacts of the policies is provided in Figure 8.1. The key areas where policies are likely to have negative cumulative implications are as follows:
- 8.7 **Increased traffic** - Any development will inevitably result in an increase in car traffic, but West Sussex County Council and Highways England have suggested that the impact of the site selected for allocation is unlikely to be significant in this respect. Indeed concentrating housing development within/adjacent to Warnham Village will enable residents to have easy access to local services and facilities and the creation of a new footpath will encourage greater use of non-car methods to do this. In turn, Policy W7 seeks to improve the provision of cycling infrastructure at the railway station, which would assist in encouraging non-car uses to reach this service, which is on the outskirts of the village. Policy W8 seeks to retain existing employment land, which will provide opportunities for residents to work locally, thus negating the need to travel longer distances beyond the boundary, potentially adding to traffic concerns. Whilst there is scope to seek additional employment sites, there were no suitable sites for this. This could however be revisited when the Neighbourhood Plan is reviewed.

- 8.8 **Impact on the countryside, landscape setting and biodiversity** - There is a potential effect on the landscape with both the extension of the BUAB and the site allocation giving rise to new development to the northern part of Warnham village. The assessment, combined with comments received from statutory bodies, including Natural England, reveals that any impact can be mitigated, for instance through the retention and enhancement of hedgerows and trees, the incorporation of green space and the provision of buffers between existing properties. The Plan has considered carefully the impact of development on the landscape in terms of topography, given the fact that Warnham village essentially sits within a dip, and the site assessed as suitable for allocation would not be detrimental to this.

**Figure 8.1: Cumulative impact of Neighbourhood Plan policies**

Policy	Sustainability Objectives									
	1	2	3	4	5	6	7	8	9	10
W1	+	0	+	+	+	0	0	+	0	0
W2	-	-	-	++	0	0	0	+	0	+
W3	0	0	0	++	0	0	0	0	+	+
W4	0	0	0	++	0	0	+	0	0	0
W5	0	0	+	+	0	++	+	0	+	0
W6	-	0	0	++	0	0	0	++	+	+
W7	0	0	0	0	++	0	0	+	+	0
W8	0	0	0	0	0	0	+	++	+	+
W9	0	0	0	0	+	0	+	++	0	+
W10	0	0	0	0	0	+	0	++	0	0

- 8.9 A Habitat Regulations Screen Assessment has been carried and Natural England has determined that *"no likely significant effects in respect of the European sites within 20km of Horsham district will occur as a result of the implementation of the Warnham Neighbourhood Plan. As such, the Neighbourhood Plan does not require a full HRA to be undertaken."* Any allocation for residential use will need to ensure that appropriate levels of open space are incorporated required to adequately provide for the needs of users such as dog walkers, in order to ensure no adverse impacts on European designated sites. The site proposed for residential allocation provides this.
- 8.10 It is acknowledged that there are a number of uncertainties when considering the effects of the policies over the time scale of the Plan. The sustainability effect of the Neighbourhood Plan should therefore be monitored on a regular basis, against the Sustainability Framework, for both its positive and negative impacts.

## 9 OVERALL CONCLUSION

- 9.1 This report presents the findings of the SA and the SEA process for the Submission Draft of the Warnham Neighbourhood Plan. It includes up-to-date baseline information about the parish and a detail of relevant plans and programmes and the implications of these for Warnham. This has enabled the development of a Sustainability Framework against which to examine the plan and its policies. It has undertaken an appraisal of the approach to both scale and location of growth in the parish against reasonable alternatives. Site allocations were appraised as were the policies, the latter including a 'do nothing' scenario for the sustainability implications if the plan were not in place. Where relevant, mitigation measures required to address any potential negative impacts have been identified and reflected in the Plan. The cumulative impacts of the plan were also identified.
- 9.2 The SA was published for consultation alongside the Pre-Submission draft of the Neighbourhood Plan under Regulation 14 of the Neighbourhood Planning Regulations 2012, for a period between 17 March and 30 April 2018. Comments on the neighbourhood plan and the content and findings of the SA were received during this period, and amendments incorporated. None of the comments require an additional appraisal of policies to be undertaken.
- 9.3 For some of the policies that could have a negative impact on the environment, there are other aspects that contribute positively to social or economic objectives. Moreover, other policies in the Neighbourhood Plan and District Plan should mitigate these negative environmental impacts.
- 9.4 Overall the most sustainable policy options have been chosen for inclusion in the Neighbourhood Plan when considered against reasonable alternatives.
- 9.5 None of the policies are likely to have any significant adverse effects, giving confidence that the Neighbourhood Plan will contribute to sustainable development.

**Appendix A      Summary of responses from statutory  
bodies during SA scoping process**

Statutory body and response	How response has been dealt with
<b>Historic England:</b> No comments received.	- No amendments required
<b>Environment Agency</b> <ul style="list-style-type: none"> <li>- We recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in your local area. This may include flood risk, water quality, and biodiversity.</li> <li>- We support that flood risk is considered in your report but note that it is in the criteria for one of your objectives and recommend that it would be stronger as an objective on its own. Flood risk is a key consideration in the decision of where development should be located i.e. should always look at areas of lowest flood risk first (flood zone 1).</li> <li>- We also recommend your SEA takes account of relevant policies, plans and strategies including your local Strategic Flood Risk Assessment, flood risk strategies and the South East River Basin Management Plan.</li> </ul>	<ul style="list-style-type: none"> <li>- An additional objective has been added.</li> <li>- As above.</li> <li>- This has been reflected.</li> </ul>
<b>Natural England:</b> <ul style="list-style-type: none"> <li>- The document appears to deal reasonably with the natural environment and indicates that the plan is likely to lead the protection and enhancement of designated and otherwise important landscapes and habitats (e.g. BAP habitats and those that are used by protected species) and I have no comments at this stage.</li> </ul>	- No amendments required.



## **Appendix B      Summary of relevant plans and programmes**

### **National and regional context**

Key objectives	Key targets/indicators	Key implications for NP and SEA
<b>National Planning Policy Framework (March 2012)</b>		
<p>Planning should drive and support sustainable economic development. It should:</p> <ul style="list-style-type: none"> <li>• secure high quality design and good standard of amenity</li> <li>• take account of the different roles of areas, recognising the intrinsic character and beauty of the countryside</li> <li>• support transition to a low carbon future in a changing climate, taking account of flood risk and encourage the reuse of existing resources and encouraging the use of renewable resources.</li> <li>• contribute to conserving and enhancing the natural environment and reducing pollution.</li> <li>• encourage the effective use of land by reusing land that has been previously developed.</li> <li>• conserve heritage assets in a manner appropriate to their significance.</li> <li>• focus significant development in locations which are, or can be made sustainable.</li> </ul>	<p>Supports local and national targets with regard to biodiversity and geodiversity.</p>	<p>Plan should contribute to the objective of achieving sustainable development (social, economic and environmental). SA Objectives should reflect the core planning principles and policies set out in the NPPF. The Plan should:</p> <ul style="list-style-type: none"> <li>• contribute to minimising impacts and providing net gains in biodiversity where possible</li> <li>• contribute to the Government's commitment to halt the overall decline in biodiversity – including by establishing coherent ecological networks that are more resilient to current and future pressures.</li> </ul>
<p>Paragraph 9: "Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment"</p> <p>Paragraphs 115 and 116: "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.</p> <p>Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> <li>• the need for the development, including in terms of any national considerations, and the</li> </ul>	<p>None</p>	<p>SA Objectives should reflect the core planning principles and policies set out in the NPPF.</p> <p>Development to accord with Warnham Parish Design Statement – SPD 2008</p>

Key objectives	Key targets/indicators	Key implications for NP and SEA
<p>impact of permitting it, or refusing it, upon the local economy;</p> <ul style="list-style-type: none"> <li>the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and</li> <li>any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."</li> </ul> <p>Paragraph 132:</p> <p>"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.</p>		<p>The Plan should ensure that development does not have a detrimental impact on any heritage assets and should seek to ensure that development actively conserves the asset.</p>
<b>The Waste (England &amp; Wales) Regulations 2011</b>		
<p>To encourage/ensure waste arises/is dealt with further up the waste hierarchy. Divert waste disposal away from landfill.</p>	<p>Target of 50% of household waste to be recycled.</p>	<p>Plan must have regard to the amended waste hierarchy. Policies and objectives should where possible encourage waste to have recovery value. The Plan should discourage landfilling of waste.</p>
<b>UK Climate Change Act 2008</b>		
<p>The Act introduced a statutory target for reducing carbon emissions.</p>	<p>Target of reducing carbon emissions by 80 per cent below 1990 levels by 2050, with an interim target of 34% by 2020.</p>	<p>Planning can make a contribution to mitigating and adapting to climate change by influencing the location, scale and character of development. The plan should include policies / objectives that contribute towards achieving lower carbon emissions and greater resilience to the impacts of climate change.</p>

Key objectives	Key targets/indicators	Key implications for NP and SEA
<b>The Natural Environment White Paper (The Natural Choice) 2011</b>		
<p>Mainstreaming the value of nature across society by:</p> <ul style="list-style-type: none"> <li>• facilitating greater local action to protect and improve nature;</li> <li>• creating a green economy, in which economic growth and the health of our natural resources sustain each other, and markets, business and Government better reflect the value of nature;</li> <li>• strengthening the connections between people and nature to the benefit of both; and</li> <li>• showing leadership in the European Union and internationally, to protect and enhance natural assets globally.</li> </ul>	<p>The process identifies the need to develop a set of key indicators to track progress</p>	<p>The Plan should consider how it can best contribute towards highlighting the value of nature and ensuring that it is protected and enhanced.</p>
<b>Biodiversity 2020: A strategy for England's wildlife and ecosystem services</b>		
<p>To halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. These outcomes will be delivered through action in four areas:</p> <ul style="list-style-type: none"> <li>• a more integrated large-scale approach to conservation on land and at sea</li> <li>• putting people at the heart of biodiversity policy</li> <li>• reducing environmental pressures</li> <li>• improving knowledge</li> </ul>	<p>A series of priority actions have been identified to deliver the four identified actions.</p>	<p>The Plan should consider how it can best contribute towards protecting and enhancing ecological networks.</p>

Key objectives	Key targets/indicators	Key implications for NP and SEA
<b>Flood and Water Management Act 2010</b>		
<p>Improve the management of flood risk for people, homes and businesses.</p> <p>To protect water supplies.</p>	<p>Local Authorities to prepare flood risk assessments, flood maps and plans.</p> <p>EA to prepare Local flood risk management strategies.</p>	<p>The Plan should take account of flooding and water management issues and strategies and consider the inclusion of policies / objectives to reduce flood risks and other impacts on the water environment.</p>
<b>Carbon Plan: Delivering our low carbon future 2011</b>		
<p>Government-wide plan for action on climate change at domestic and international levels.</p>	<p>Includes a range of sector-based plans and targets for low carbon:</p> <ul style="list-style-type: none"> <li>• building</li> <li>• transport</li> <li>• industry</li> <li>• electricity</li> <li>• agriculture, land use, forestry and waste</li> </ul>	<p>The Plan should include policies / objectives that contribute towards achieving lower carbon emissions.</p>
<b>Mainstreaming sustainable development 2011</b>		
<p>This refreshed vision builds upon the principles that underpinned the UK's 2005 SD strategy, recognising the needs of the economy, society and the natural environment, alongside the use of good governance and sound science.</p>	<p>Promises a new set of indicators from DEFRA that link initiatives and include wellbeing.</p>	<p>Plan should take account of climate change and promote sustainability through sustainable, low carbon and green economic growth.</p>

Key objectives	Key targets/indicators	Key implications for NP and SEA
<b>The South East Biodiversity Strategy (South East England Biodiversity Forum) 2009</b>		
Provides a coherent vision to safeguard and enhance the regions biodiversity and wildlife. Embed a landscape scale approach to restoring whole ecosystems in the working practices and policies of all partners. Create the space needed for wildlife to respond to climate change. Enable all organisations in the South East to support and improve biodiversity.	Provides a framework for the delivery of biodiversity targets through biodiversity opportunity areas and habitat and species targets.	The NP should consider objectives to protect and where possible, enhance biodiversity.
<b>South East River Basin Management Plan</b>		
Prepared under the Water Framework Directive, the plan is about the pressures facing the water environment in the South East River Basin District and the actions that will address them.	By 2015, 18% of surface waters (rivers, lakes, estuaries and coastal waters) are going to improve for at least one biological, chemical or physical element. By 2015, 23% of surface waters will be at good or better ecological status/ potential and 33% of groundwater bodies will be at good status. In combination 23% of all water bodies will be at good status by 2015. At least 47% of assessed surface waters will be at good or better biological status by 2015.	The NP needs to consider the impact of proposed development on water quality.

## County/local context

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
<b>West Sussex Transport Plan 2011-2026</b>		

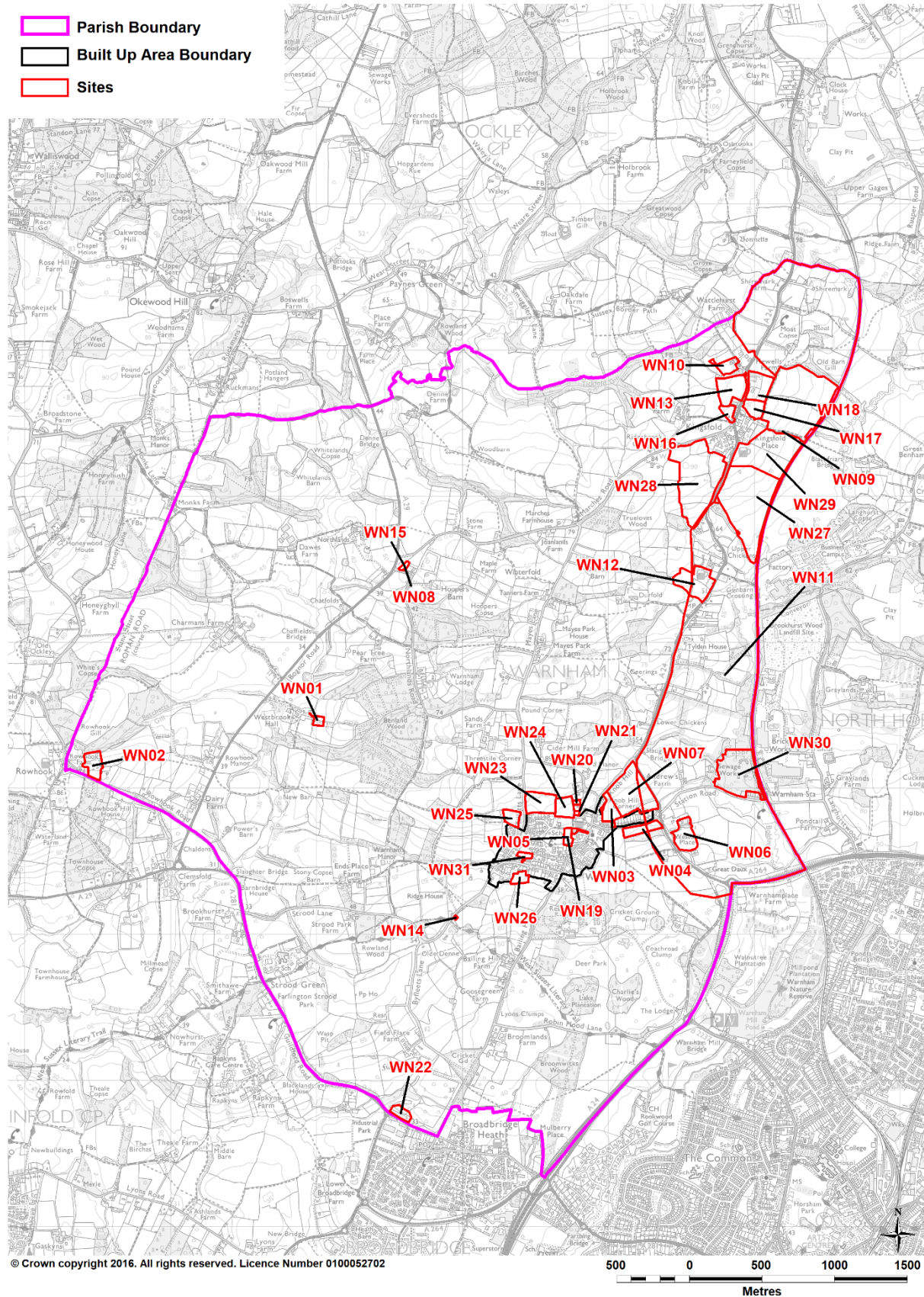


Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
<p>To improve quality of life for the people of West Sussex via four key strategies to maintain, manage and invest in transport:</p> <ul style="list-style-type: none"> <li>• promoting economic growth</li> <li>• tackling climate change</li> <li>• providing access to services, employment &amp; housing</li> <li>• improving safety, security &amp; health</li> </ul>	<p>Indicators include: congestion, mode of travel to work and school, cycling trips, accessibility, road traffic accidents, road and footway maintenance, street lighting, highway structures, road flooding, air quality and transport emissions.</p>	<p>The Plan should consider policies / objectives which contribute to transport sustainability. This should go beyond reducing carbon emissions to include economic growth, safety, pollution, traffic reduction and access to services.</p>
<b>West Sussex Waste Local Plan 2014</b>		
<p>To facilitate a continuing decline in the reliance on disposal to land and the aspiration is that there will be 'zero waste to landfill' by 2031.</p>	<p>To only make provision for a declining amount of landfill over the plan period with 'zero waste to landfill' by 2031.</p>	<p>The Plan should consider how, within the context of a growing population in Warnham, waste generation can be minimised and it can be ensured that Warnham contributes towards the target of zero waste to landfill.</p>
<b>West Sussex County Council - Building A Sustainable Future: A strategy for delivering the corporate priority 2012</b>		
<p>This Strategy focuses on four key priority areas that address the main challenges facing West Sussex County Council. The four priorities for action are:</p> <ul style="list-style-type: none"> <li>• reduce carbon emissions</li> <li>• adapt to a changing climate</li> <li>• use resources efficiently and effectively</li> <li>• make sustainability business as usual</li> </ul>	<p>The Strategy contains information about why these areas are a challenge to the County and sets out actions and 'clear and challenging targets against each priority'.</p>	<p>Plan should consider including objectives / policies to support reductions in carbon emissions, and consider adaptation to a changing climate and the efficient use of resources.</p>
<b>Sustainable Community Strategy for West Sussex 2008 - 2020</b>		
<p>Cross cutting strategy aiming to:</p> <ul style="list-style-type: none"> <li>• relieve the pressures on the road network</li> <li>• explore opportunities for renewable energy</li> <li>• integrate water resource requirements in new development</li> <li>• reduce carbon footprint</li> <li>• improve waste management to reduce waste generation and increase recycling.</li> <li>• make best use of innovation and new technology to reduce harmful emissions</li> <li>• improve access for all to the natural and historic environment and a range of sporting, leisure, cultural and arts activities.</li> </ul>	<p>No specific targets.</p>	<p>The Plan should consider including policies / objectives that help meet the key objectives.</p>
<b>Sussex Biodiversity Action Plan</b>		
<p>Maintain and, where practicable, enhance the wildlife and habitats that provide the natural character and diversity of Sussex</p>	<p>Sussex Biodiversity Record Centre inventory statistics for species and habitats e.g.:</p>	<p>Plan should consider including policies / objectives to: enhance (where possible) the</p>

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
<ul style="list-style-type: none"> <li>Identify priority habitats and species in Sussex</li> <li>Set realistic and ambitious targets and timescales for priority habitats and species and to monitor progress towards them</li> <li>Raise public awareness and encourage involvement in biodiversity action.</li> </ul>	<ul style="list-style-type: none"> <li>Rare Species Inventory</li> <li>Biodiversity Action Plan Species Inventory</li> <li>Pond Inventory.</li> </ul>	wildlife and habitats that give rise to West Sussex's natural character and diversity.
<b>West Sussex Strategic Flood Risk Assessment 2010</b>		
<p>The main objective of the SFRA is to provide flood information so that an evidence and risk based sequential approach can be made when making planning decisions in line with the NPPF. It also aims to:</p> <ul style="list-style-type: none"> <li>cover a wide spatial area and look at flood risk today and in the future</li> <li>support sustainability appraisals of the local development frameworks</li> <li>identify further investigations that may be required to assess specific development proposals.</li> </ul>	The assessment investigates flood risk issues for specific sites and makes recommendations.	The Plan should take into account the SFRA's sequential testing guidance and should consider inclusion of objectives related to flood risk.
<b>Horsham Strategic Flood Risk Assessment (Revised 2010)</b>		
Identifies all areas of flood risk within the district as well as what the level of risk is	Flood zone	The Plan needs to ensure that new development avoids areas identified at risk of flooding and that the existing level of flood risk within and outside Warnham is not exacerbated and, where possible, reduced.
<b>A Strategy for the West Sussex Landscape - West Sussex County Council 2005</b>		
<p>1: ensure high quality new development which contributes to and reinforces landscape character</p> <p>2: conserve and enhance historic landscape character</p> <p>3: ensure the maintenance and renewal of the agricultural landscape</p> <p>4: conserve and enhance semi-natural habitats including securing the future of woodlands, hedgerows and trees as distinctive landscape features</p> <p>5: promote and celebrate the value and variety of the West Sussex landscape.</p>		Plan should be consistent with supporting the objectives in the strategy.
<b>Horsham District Landscape Capacity Assessment, 2014</b>		
To identify where development may be carried out without an unacceptable impact on landscape character in general	5-point scale to assess landscape sensitivity and landscape value	Plan should be consistent and take into account assessment of landscape capacity

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
and on the setting of outstanding assets within Mid Sussex		
<b>Sussex Historic Landscape Characterisation – West Sussex County Council and others, 2010</b>		
To identify areas or units of land based on their key historic landscape attributes.		The Plan should ensure that areas of historic landscape character are preserved and enhanced.
<b>Using Less, Living Better - West Sussex Environment and Climate Change Board, 2012</b>		
Helping to reduce emissions by at least 50% by 2025.	None	The Plan should seek to reflect, where possible, the actions proposed and the outcomes that are envisaged.
<b>Horsham District Biodiversity Action Plan, 2003</b>		
To recognise the value of biodiversity and landscape within the District and set out how these assets can be protected and enhanced.	Assesses protected species and valued landscapes	The Plan should ensure that it does not have an unacceptable impact on protected species or valued landscapes.

## **Appendix C      Map of sites submitted for consideration as site allocations**





## **Appendix D – Housing Needs Assessments - Determining an appropriate housing scale for Warnham**

### **Housing Scale and Location**

- D1. A key objective of the Horsham District Planning Framework (HDPF) is to provide a range of housing developments across the district that: deliver the target number of new homes; respects the scale and character of existing places; and so far as is possible caters for the needs of all residents, including the delivery of a range of housing sizes and types including affordable housing.
- D2. Provision is made in the HDPF for the development of at least 16,000 homes and associated infrastructure within the period 2011-2031, at an average of 800 homes per annum. This figure will be achieved by:
- Housing completions for the period 2011 – 2015.
  - Homes that are already permitted or agreed for release.
  - Strategic Sites: a. At least 2,500 homes at Land North of Horsham; b. Around 600 homes at Land West of Southwater; c. Around 150 homes at Land South of Billingshurst.
  - The provision of at least 1500 homes throughout the district in accordance with the settlement hierarchy, allocated through Neighbourhood Planning.
  - 750 windfall units.
- D3. There is an expectation that Warnham will provide some housing during the lifespan of the Plan, primarily to meet locally defined needs, but also to contribute to the wider need as set out in D1.
- D4. As Horsham District Council (HDC) does not allocate a definitive housing number to Warnham, an independent planning consultancy<sup>6</sup> was commissioned to examine the potential 'unconstrained' number of dwellings that the Neighbourhood Plan might seek to accommodate by applying a series of assessments to determine possible housing need scenarios. However, Planning Practice Guidance (PPG) states that 'establishing future need for housing is not an exact science and no single approach will provide a definitive answer'<sup>7</sup>. The guidance is primarily aimed at local planning authorities preparing Strategic Housing Market Assessments (SHMA) at the district level although the procedures can be utilised at a neighbourhood level in a proportionate manner. Accordingly, a range of housing assessments have been identified to accord with the approach endorsed by the PPG.
- D5. The HNA considered four data sets as follows:
- 1 The Horsham District Planning Framework 'settlement hierarchy' minimum derived figure (HDPF) 2011-31
  - 2 Housing Need in Horsham 2015 (SHMA), a proportional share drawn from an Objectively Assessed Need
  - 3 DCLG Household projections
  - 4 A projection derived from homes growth between 2001 and 2016.

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<sup>6</sup> Housing Needs Assessment; AECOM; November 2017

<sup>7</sup> PPG Housing and economic development needs assessment Para. 014Ref.ID2a-014-20140306



In addition, it applied a series of market signals to the data, for instance, migration in and out, employment trends and overcrowding which might also impact on the need for housing in the parish.

- D6. The datasets provide a range of housing numbers for Warnham's NDP, from 18 to 206 dwellings, to be delivered over the Plan Period. This is a wide range on which to base a Neighbourhood Plan and hence further interrogation of the assessments is warranted. Importantly, HDC have provided guidance to AECOM<sup>8</sup>, in developing their assessment, that greater weight should be given to the Local Plan-derived housing target for Warnham, i.e. the 'fair-share' of the 1,500 dwellings to be delivered through Neighbourhood Plans in accordance with the settlement hierarchy, because the Local Plan has been through examination and been adopted.
- D7. The assessments provide top-down 'unconstrained' figures and do not take into account: the local strategic planning policies, local environmental constraints and site allocations, locally derived housing need, the views of local people, or issues relating to the supply side. These points are therefore explored in further detail below to enable a fuller interpretation of figures.

### **Local strategic planning framework**

- D8. It is important to consider the number of houses appropriate to a rural parish such as Warnham. The HDPF is clear in its approach to sustainable development, stating in Policy 2 (5) that its overarching strategy is to 'continue to support in principle the sustainable development of settlements through an appropriate scale of development which retains the existing settlement pattern over the plan period.'
- D9. Policy 15 (4) of the HDPF sets out that at least 1,500 homes throughout the district in accordance with the settlement hierarchy, will be allocated through Neighbourhood Planning.
- D10. Policy 3 states that development will be permitted within towns and villages which have defined built-up areas. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement in accordance with the settlement hierarchy.
- D11. HDC's review of Settlement Sustainability<sup>9</sup>, which informs Policy 3 of the HDPF, classifies Warnham as a medium village. Such settlements have a moderate level of services and facilities and community networks, together with some access to public transport. They provide some day to day needs for residents, but rely on small market towns and larger settlements to meet a number of their requirements. The smaller hamlet of Kingsfold is an unclassified settlement, meaning it has few or no facilities or social networks and limited accessibility, and is reliant on other villages and towns to meet the needs of residents.
- D12. As stated in the HDPF, proposals for new housing will need to ensure that development is of a scale that can retain the character and role of the settlement in terms of the range of services and facilities and community cohesion, as set out in the Settlement Sustainability Review background document. This approach will make it possible to meet the identified local needs of these settlements and provide an appropriate level of market and affordable housing, as well as maintaining the viability of the smaller villages and towns, for example supporting local schools, or local shops. It will also ensure that the settlement function and pattern of the district is retained, retaining the rural character of the district beyond these settlements.

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<sup>8</sup> Para. 24, Housing Needs Assessment; AECOM; November 2017

<sup>9</sup> [https://www.horsham.gov.uk/data/assets/pdf\\_file/0016/9313/CD\\_GC\\_01\\_Settlement-Sustainability-Review2014.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0016/9313/CD_GC_01_Settlement-Sustainability-Review2014.pdf)

D13. Bearing this strategic context in mind, and in particular the focus on sustainable development, it can be determined that Warnham village, with a built-up area boundary and classified as a medium village, might be appropriate for limited infill development or extension. As Kingsfold has no defined built-up area, it is inappropriate to allocate additional housing at that location as it would be contrary to the HDPF.

### **Locally derived housing need**

D14. Horsham has 671<sup>10</sup> on the waiting list for housing (November 2017) and a 'fair share' could be accorded to Warnham. Warnham has 1.6% of the district's total number of dwellings<sup>11</sup> and a 1.6% share of 671 to Warnham is **11**. Policy 16 of the HDPF sets out the affordable housing requirements as follows:

- On sites of 15 or more dwellings, or on sites over 0.5 hectares, the Council will require 35% of dwellings to be affordable; and
- On sites of 5 to 14 dwellings, the Council will require 20% of dwellings to be affordable (or where on-site provision is not achievable a financial contribution equivalent to the cost of the developer providing the units on site)

D15. The NDP supports these minimum requirements for affordable housing; without strict adherence to this requirement the objective of the Plan to achieve a better balanced community will be undermined. At 20% to 35% affordable this would give an allocation to Warnham of **31 to 55** dwellings.

D16. A Local Housing Needs Survey for Warnham parish was undertaken by Action in Rural Sussex in 2015. It concluded that there is an unmet need for some affordable housing for those with a local connection to the parish. In particular it demonstrated a need for more dwellings in Warnham that are affordable, are suitable for those wishing to downsize, those looking for their first home, and those couples with growing families. At the time of the survey, it was recommended that **up to 15 units of affordable housing** would be most appropriate to develop during the lifespan of the NDP. This is in line with the figures derived from the HDC waiting list. At 20% to 35% affordable this would give an allocation to Warnham of **43 to 75** dwellings.

D17. It should be noted that the Local Housing Needs Survey provides a snapshot of housing need and therefore may need to be updated in the lifespan of the Neighbourhood Plan to reflect a changing picture of need.

### **Findings from the local engagement process**

D18. The views of local residents need to be considered when determining how much housing is appropriate to a neighbourhood area.

D19. The Neighbourhood Development Plan Parish Community Survey for Warnham revealed the following key community aspirations about future housing provision in the parish:

- 81% felt that that minimum number of open-market houses should be built to enable the required provision of affordable homes;

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<sup>10</sup> AECOM Para.133

<sup>11</sup> AECOM Para. 133

- 77% believe that there is a need for homes suited to the needs of first time buyers, such as Starter Homes;
- 81% would like to see more homes to which older people could downsize;
- 63% want to maintain the nature and character of the existing countryside; and
- 63% want to minimise adverse impacts of development on landscape, topography and views.

D20. In essence, local people would accept a limited number of homes that meet a local need and enable the continuing viability of the parish, but that do not erode the character of the parish or the separation of the individual settlements, and which do not overstretch the infrastructure capacity of the parish.

### Supply side factors

D21. There are numerous supply-side considerations, including local environmental constraints, the location and characteristics of deliverable, suitable land, and capacity work carried out by HDC, including but not limited to the SHELAA and Local Call for Sites, that will inform the number of dwellings appropriate to be delivered in the parish, bearing in mind that Warnham village itself is the only settlement with a defined boundary hence any allocations will be centred here.

D22. The Neighbourhood Plan Steering Group undertook a local Call for Sites and 13 sites were submitted. Alongside the 18 sites already identified through the HDC's SHELAA, all sites were assessed using a methodology agreed with HDC. This assessment provides evidence that the sites selected are the most appropriate for development - that they are in the most sustainable location, they are in conformity with the strategic policies of the HDPF and that there is a good prospect that they will be developed. The process led to a short-listing of six sites, two of which were not considered further for inclusion in the NDP as they are small rural sites remote from Warnham's built-up area boundary. One site, the Glebe, Church Street (WN 19), has been granted planning permission for 14 additional dwellings – DC/17/0566. The remaining three sites are all owned by one landowner. One of these have been allocated in the NDP (WN23) (which incorporates WN24). The third, Land South of Bell Road (SHELAA SA071/WN04) has not been allocated in the NDP because the landowner/developer's proposal for the site is to develop in larger scale plots for self-build and does not meet the identified local housing need in terms of housing size and mix. Additionally, the allocated sites can provide the housing needs identified in the NDP.

### Summary of assessments

D23. To establish an appropriate level of housing for the period covered by the Warnham Neighbourhood Plan, the research undertaken by AECOM have been examined and weighted according to its relevance at the local level bearing in mind the points made in this report. Table D1 sets out the findings, and Figure D1 displays these graphically.

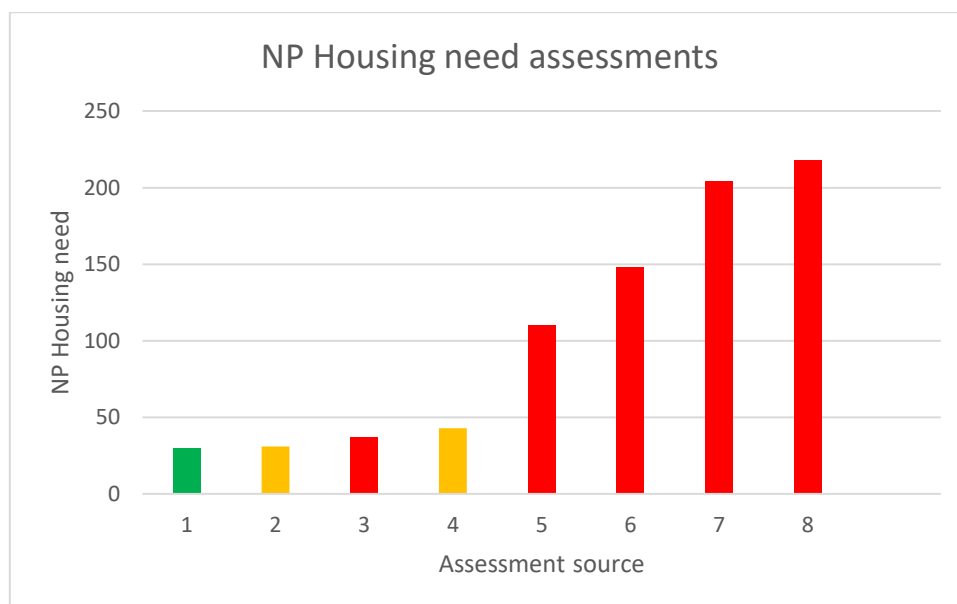
**Table D1: Commentary on the assessments and relative weighting at the neighbourhood level**

No.	Source	Assessment basis	Assessment	Commentary	Weighting
1	HDPF/ AECOM Para 86	Local Plan Settlement Hierarchy	NPs to provide at least 1,500 dwellings; Warnham to have a 'fair	NPs need to be compliant with the Local Plan. This	High

			share'. Fair share determined pro rata to the number of dwellings in Warnham village (BUAB) to comparable number in all similar settlements in the district. Warnham's share: 1.97% of 1500 = <b>30</b> (See note 1)	assessment is the most appropriate means of assessing Warnham's housing number in the NP.	
2	HDC/ AECOM Para 133	Housing Waiting List	Horsham have 671 on the housing list for housing and a 'fair share' could be accorded to Warnham. A 1.6% share to Warnham is 11. At 20% to 35% affordable this would give an allocation to Warnham of <b>31 to 55</b>	Short listed sites will enable 35% affordable to be realised and hence the housing need from this assessment can be taken as the lower figure i.e. <b>31</b> .	<b>Medium</b>
3	HDC/ AECOM Para. 102	Home growth since 2011	HDC records show that 12 homes were developed in the period April 2011 to March 2016. Projecting this growth rate to 2031 provides a growth figure of <b>37</b> .	Historic parish growth rates provide little guidance on future housing needs to be accommodated in the NP.	<b>Low</b>
4	Action in rural Sussex	Local affordable housing needs	A survey was undertaken for the NP mainly to identify the local need for affordable housing i.e. those with family or employment connections to the parish. This showed a total need for 22 units but local transfers to new affordable housing would release 7 units. The net increase is 15 units. HDPF Policy 16 requires 20% to 35% of new developments to be affordable. Total number of homes to provide affordable housing: <b>43 to 75</b>	The survey provides relevant local data but at a specific time. Short listed sites will enable 35% affordable to be realised and hence the housing need from this assessment can be taken as the lower figure i.e. <b>43</b>	<b>Medium</b>
5	HDC/ AECOM Para. 103	Home growth 2001 to 2016	Combining the records 2001 to 2011 (below) and growth to 2016 (3, above)	Historic growth trends vary widely depending on the	<b>Low</b>

			gives growth rate over a longer period and this leads to a future need of <b>110</b> .	time span considered and hence cannot be used with confidence.	
6	Census/ AECOM Para. 101	Home growth 2001 to 2011	Records of housing growth 2001 to 2011 in Warnham parish shows 106 homes. Applying this growth rate to the period 2017 to 2031 provides a figure of <b>148</b> .	Figures record growth in the parish rather than the village of Warnham where growth will be focussed in accordance with policy. Growth of the village will be constrained by site availability. No logic to assuming village growth will be unlimited and continue at historic rates.	<b>Low</b>
7	Strategic Housing Market Assessment / AECOM Para. 91	Unconstrained Objectively Assessed Need	Projections of the growth in housing needs are based on a national forecast and local employment growth. A district requirement of 12720 units is identified. Warnham's share: 1.6% of 12750 = <b>204</b> (See Note 1)	The SMHA is a district wide assessment that does not take account of local circumstances i.e. the prior allocations of the strategic sites in the HDPF and the settlement hierarchy.	<b>Low</b>
8	DCLG /AECOM Para. 99	Household Projections	Dept. of Communities and Local Govt. produce forecasts of household growth. The projected total for Horsham district in 2031 is 66854. This leads to an allocation to Warnham of <b>218</b> homes. (See Note 1)	The SMHA is a district wide assessment that does not take account of local circumstances i.e. the prior allocations of the strategic sites in the HDPF and the settlement hierarchy.	<b>Low</b>

Note 1. In AECOM's analyses, gross figures have been reduced by 12 to take account of dwellings built in the parish between 2011 and 2016. However, these may be considered as individual windfall sites, not part of planned development meeting the specific allocations of the HDPF, and are excluded in the assessment of gross figures included in the table.



**Key**

Column	Housing need assessment	Weighting	Data sources
1	30	High	HDPF (Local Plan) – ‘fair share’ of at least 1500
2	31	Medium	HDC Housing Waiting List (at 35% affordable)
3	37	Low	HDC Home growth since 2011
4	43	Medium	AirS Warnham affordable housing needs (at 35% affordable)
5	110	Low	Home growth 2001 to 2016
6	148	Low	2011 Census - home growth 2001 to 2011
7	204	Low	Strategic Market Housing Assessment
8	218	Low	DCLG Household projections

**Figure D1 Y Housing assessment from a range of data sources**

D24. In addition to quantitative assessments, the AECOM report also reviews market signals and applied judgement on how these may affect housing need<sup>12</sup>. These are summarised in Table D2 below and indicate the underlying trend in the need for housing development in the Neighbourhood Plan area.

**Table D2: Market signals affecting housing need, drawn from the AECOM report**

Factor	Impact assessment and direction	Assessment area
Employment trends	Moderate impact - upwards	Gatwick Diamond
Housing transactions (Prices)	Some impact - upwards	Warnham

<sup>12</sup> AECOM Report Table 1



Housing transactions (Volume)	Some impact - upwards	Warnham
Migration and demographics	Some impact - upwards	London to Brighton
Overcrowding and concealment	Neutral	Warnham
Rate of development	Some impact - upwards	Warnham

D25. In arriving at any final housing needs figure for Warnham, market signals evidence should be taken into consideration. In this instance, bearing in mind the balance of 'upwards' impact set out in Table D2 above, an increase in dwelling numbers to meet future need is appropriate.

D26. In making numerical assessments there are three further considerations which contribute to overall numbers:

- i. 14 additional houses have been permitted (August 2017) at a site at the centre of the village – the Glebe. This site was originally short listed and could be considered as contributing to the overall neighbourhood plan housing needs. The site has not provided affordable housing.
- ii. 6 additional affordable intermediate market houses have been permitted (September 2017) at a rural exception site in the north of the parish.
- iii. 12 new dwellings have been constructed since the start of the plan period at various individual sites within the parish.

D27. Warnham Parish Council has followed closely the preparation of the neighbourhood plan and has studied the range of housing need assessments available. The council has written to the Warnham Neighbourhood Plan Steering Group:

***To produce a Neighbourhood Plan most likely to gain popular support at Referendum, the Parish Council encourage the Neighbourhood Plan Steering Group to develop the plan based on the lower range of housing growth.***

### Conclusion on housing assessments

D28. Examining the various housing assessments within the parameters of the local context, and, in particular, the weightings afforded to the individual assessments, and the market indicators, the NDP for Warnham seeks to provide **a minimum of 50 new dwellings** between 2016 and 2031 as set out in Policy W2, via site allocations set out in Policy W6 which will enable the fulfilment of the required affordable housing with the minimum market housing and is a rate of growth within historic trends.

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D.29 The 50 units identified above, the development at the Glebe site and other housing built in and around the village since 2011 will provide an annualised growth rate to 2031 of approximately 3.5 units per year. Local records of house building in the village show that between 1971 and 2015, 190 units were constructed. This represents an average annual rate of 4.2 units per year. The committed and proposed build rate is within this historic village-based growth rate.

The HDPF Examiner recommended that the plan should be updated within 5 years. It is therefore anticipated that the NDP may also need to be reviewed in accordance with the updates to the HDPF.

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## Appendix E – SEA Requirements

Requirements	Where covered in report
An outline of the contents, main objectives of the plan or programme, and relationships with other relevant plans and programmes.	Sections 2, 3 and 4
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 5
The environmental characteristics of areas likely to be significantly affected.	Section 4
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 3
The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 3 and Appendix B
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. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative	Section 4 and 6
The measures envisaged to prevent, reduce and as fully as possible off-set any significant adverse effects on the environment of implementing the plan or programme.	Section 6, 7 and 8
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.	Section 7 and 8
A description of measures envisaged concerning monitoring in accordance with Article 10.	Section 9

A non-technical summary of the information provided under the above headings.	Section 1 and 2
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