

Steyning Neighbourhood Development Plan 2019-2031

**A report to Horsham District Council on the
Steyning Neighbourhood Development Plan**

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Executive Summary

- 1 I was appointed by Horsham District Council in October 2020 to carry out the independent examination of the Steyning Neighbourhood Development Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood plan area on 21 December 2020 and 14 January 2022.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding local character. It also proposes a series of local green spaces. In the round, the Plan has identified a range of issues where it can add value to the strategic context already provided by the wider development plan.
- 4 The Plan has been underpinned by community support and engagement. It is clear that all sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Steyning Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area.

Andrew Ashcroft
Independent Examiner
13 April 2022

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Steyning Neighbourhood Development Plan 2019-2031 (the 'Plan').
- 1.2 The Plan was submitted to Horsham District Council (HDC) and the South Downs National Park Authority (SDNPA) by Steyning Parish Council (SPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) 2012 and its updates in 2018, 2019 and 2021. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether or not the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted plan has been designed to be distinctive in general terms, and to be complementary to the development plan in particular. It has a clear focus on safeguarding the local environment and ensuring good design standards. It proposes the designation of a series of local green spaces.
- 1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the Plan area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by HDC, with the consent of SPC, to conduct the examination of the Plan and to prepare this report. I am independent of HDC, SPC and the SDNPA. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 35 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral Service.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan is submitted to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Sections 7 and 8 of this report.

Other examination matters

- 2.6 In examining the Plan I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report. I am satisfied that the submitted Plan complies with the three requirements.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the Submission Plan;
- the Basic Conditions Statement;
- the Consultation Statement;
- the HRA Screening Report;
- the Biodiversity Report
- the Character Appraisal
- the Climate Change Report
- the Local Green Spaces Review;
- the Parish Council's responses to the Clarification Note;
- the District Council's responses to the Clarification Note
- the representations made to the Plan;
- the Habitats Regulations Assessment Addendum (November 2021);
- the response from Natural England to the procedural consultation on the Habitats Regulations Assessment Addendum;
- the adopted Horsham District Planning Framework 2018-31;
- the adopted South Downs Local Plan 2014-33;
- the National Planning Policy Framework (2021);
- Planning Practice Guidance; and
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 21 December 2020. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. I maintained the social distancing requirements that were in place at that time. The visit is covered in more detail in paragraphs 5.9 to 5.17 of this report. Given the protracted nature of the examination, I made a second visit on 14 January 2022. The purpose of this additional visit was to ensure that the examination proceed on the basis of an accurate and current assessment of the land uses in the proposed local green spaces.

3.3 Revised guidance from Natural England on water neutrality was published during the examination. It delayed the wider process. Section 6 of this report details the way in which this issue was addressed during the examination. In particular a Habitats Regulations Assessment Addendum was submitted in November 2021.

3.4 During this period the NPPF was updated in July 2021. The Plan had been originally submitted on the basis of the former version of the NPPF (2019). This is reflected in the Basic Conditions Statement. Where it is necessary to do so, I have assessed the Plan against the most recent version of the NPPF.

3.5 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I was satisfied that the Plan could be examined without the need for a public hearing. I initially advised HDC of this decision

once I had received the responses to the clarification note. On the basis of the findings of the Habitats Regulations Assessment Addendum and Natural England's response to that document I also concluded that there was no need for a hearing on this specific issue.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such national legislation requires that neighbourhood plans are supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 SPC has prepared a Consultation Statement. It sets out the mechanisms that were used to engage the community and statutory bodies in the plan-making process. It also provides specific details about the consultation process that took place on the pre-submission version of the Plan (September to October 2019).
- 4.3 The Statement is particularly helpful in the way in which it captures the key issues in a proportionate way and is then underpinned by more detailed appendices
- 4.4 Section 4 of the Statement sets out details of the comprehensive range of consultation events that were carried out in relation to the initial stages of the Plan. The principal events included:
- the open events at the farmers' markets (September and November 2018);
 - the Vision Statement Survey (September to November 2018);
 - the Call for Sites (October 2018);
 - the Grammar School Winter Fair (November 2018);
 - the High Street late-night shopping event (December 2018);
 - the Greening Steyning Green Drinks event (February 2019);
 - the release of the Housing Needs Assessment (May 2019);
 - the site promoters' event (May 2019); and
 - the consideration of the Plan at Parish Council meetings.
- 4.5 I am satisfied that the engagement process was detailed, proportionate and robust. It sought to engage local residents, statutory bodies, local businesses and potential developers in a balanced way. The representations made to the Plan highlight that the community had different views about certain elements of the Plan. This can sometimes be a natural outcome of the plan preparation process. It does not detract from the wider integrity of the plan preparation process. The differences in the comments received continued in the comments received on the submission version of the Plan (and as summarised in paragraph 4.9). Any local differences are procedurally resolved by the referendum process.
- 4.6 Section 5 of the Statement provides general information on the key comments received on the pre-submission version of the Plan. It identifies the principal changes that worked their way through into the submission version. This process is then set out in further detail in Appendix 25 where comments are made to each representation that was received on the pre-submission plan. This process helps to describe the evolution of the Plan.

- 4.7 It is clear that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation.
- 4.8 From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process.

Representations Received

- 4.9 Consultation on the submitted plan was undertaken by HDC for an eight-week period that ended on 11 September 2020. This exercise generated comments from a range of organisations as follows:
- Waverley Borough Council
 - Sport England
 - Natural England
 - Southern Water
 - Surrey County Council
 - Horsham District Council
 - Richborough Estates
 - South Downs National Park Authority
 - Cala Homes
 - West Sussex County Council
 - Historic England
 - The Wiston Estate
- 4.10 The submitted Plan generated representations from 44 local residents. In most cases these representations comment on the relationship between the Plan's proposed designation of local green spaces and the wider need to promote housing to meet local needs. The various representations take differing views on these important matters.
- 4.11 I have taken account of all the representations received. Where it is appropriate to do so, I refer to particular representations in my assessment of the policies in Section 7 of this report.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area consists of the parish of Steyning. Its population in 2011 was 5990 persons living in 2772 houses. It was designated as a neighbourhood area by HDC and SDNPA on 21 May 2018 and on 23 March 2018 respectively. The neighbourhood area is irregular in shape and is located to the immediate west of Bramber. It is located in the south-eastern part of Horsham District. Steyning is located at the north end of the River Adur gap in the South Downs. It is four miles north of Shoreham-by-Sea. The neighbourhood area is predominantly rural in character and much of its area is in agricultural use.
- 5.2 Steyning is an attractive small town located to the immediate north of the South Downs. Its built heritage reflects its historic importance and significance. The church of St Andrew is a superb example of late Norman architecture. Similarly, the range of buildings in Church Street and High Street include a wide-ranging series of well-preserved buildings from many periods and styles. In this wider context the town has a wide range of retail, commercial, community and education facilities. The combination of its natural setting, its heritage assets and its facilities is particularly attractive and appealing.
- 5.3 The remainder of the neighbourhood area consists of a very attractive agricultural hinterland. The south-west part of the neighbourhood area is within the South Downs National Park. It provides an attractive backcloth to the elements of built development.

Development Plan Context

- 5.4 The development plan covering the neighbourhood plan area is the Horsham District Planning Framework (HDPF) and the South Downs Local Plan. The HDPF was adopted in 2015 and covers the period up to 2031. It sets out to bring forward new growth that is proportionate to the size of the various settlements in the District. Policy 2 (Strategic Development) focuses development in and around Horsham itself together with other strategic development in Southwater and Billingshurst. Elsewhere it proposes an appropriate scale of development which would retain the overall settlement pattern in the District. Policy 3 establishes a settlement hierarchy. Within this context Steyning is identified as a Small Town/Larger Village (the second category in the hierarchy). Policy 4 supports the expansion of settlements subject to various criteria being met. Policy 15 (Housing Provision) sets the scene for the strategic delivery of new housing. Beyond Horsham, Southwater and Billingshurst it identifies that 1500 homes should be delivered collectively across the District through neighbourhood plans in accordance with the settlement hierarchy. The existing made neighbourhood plans in the District have collectively allocated sites which would deliver 1448 homes. Once additional plans awaiting referendum in the District are included the total would increase to 1880 homes.

5.5 In addition to the policies set out above, the following policies in the HDPF have been particularly important in influencing and underpinning the various policies in the submitted Plan:

Policy 26	Countryside Protection
Policy 32	Quality of New Development
Policy 43	Community Facilities, Leisure and Recreation

5.6 HDC has made good progress in terms of its preparation of a new Local Plan. A draft Regulation 18 Local Plan was published for consultation between February and March 2020. However further progress on the Plan has now been affected by Natural England's Position Statement on water neutrality which was published last year. In any event in process terms this Plan is not at a stage at which it can have any significance in the examination of the submitted neighbourhood plan. Nevertheless, HDC has helpfully provided advice to qualifying bodies on how it anticipates that the emerging Plan will have a bearing on the well-developed neighbourhood planning agenda in the District. This has affected the way in which the neighbourhood plan has been prepared and the timing of its submission.

5.7 The south western part of the neighbourhood area is located within the South Downs National Park. As such, future development in this area is controlled by the South Downs Local Plan. It is primarily a landscape-led Plan. Strategic Policies SD4,5 and 6 address Landscape Character, Design and Views respectively.

5.8 The submitted Plan has been prepared correctly and properly within this current adopted development plan context. In doing so, it has relied on up-to-date information and research that has underpinned existing planning policy documents in the District and in the National Park. This is good practice and reflects key elements in Planning Practice Guidance on this matter. It is also clear that the submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

Unaccompanied Visit

5.9 I visited the neighbourhood area on 21 December 2020. I maintained appropriate social distancing measures in force at that time.

5.10 I drove into the neighbourhood area along the A24/A283 from the north. This gave me an initial impression of its setting and character in general terms. It also highlighted its connection to the strategic road system and to Horsham to the north and east.

5.11 I parked off Goring Road in the southern part of the village. Given its compact nature I was able to undertake the majority of the visit on foot. I walked into the village centre along Cripps Lane, Vicarage Lane and Church Street. I saw the proposed local green space at Fletchers Croft and its relationship with the surrounding community buildings. I saw the very impressive St Andrew and St Cuthman's Church and spent a quiet time

sat in the nave. Pevsner's description of the Church as 'virile and inventive, certainly the best Norman church in Sussex and among the best in the whole country' was self-evident. I was then rewarded with the equally-impressive Church Street and its variety of buildings of different ages and styles which combine in perfect harmony.

- 5.12 I then looked at the High Street. I saw its impressive vernacular buildings and the vibrant and attractive range of retail and commercial premises in the section to the north of the junction with Church Street. Many of the shops had attractive Christmas displays in their windows I saw the equally impressive but more residential properties to the south of the junction.
- 5.13 I then walked looked to the north of the village centre and along Horsham Road. I saw the Grammar School, the Leisure Centre and the Cuthman Centre. I saw that in combination they provided an attractive and vibrant community facility within the village. I then took the opportunity to look at the proposed local green space opposite the school (Bayards Field)
- 5.14 I then retraced my steps and walked along Horsham Road. I walked along Mouse Lane and into the proposed Mill Field local green space. Thereafter I found my way into the Rifle Range local green space within the wider Steyning Downland Scheme. I saw its imposing relationship with the South Downs to the immediate west.
- 5.15 I then walked along Newham Lane, Laines Road and Coombe Road to look at the proposed local green space to the west of Coombe Road. As with the proposed Rifle Range local green space, I saw its relationship with the South Downs. I then walked along Ingram Road to Bramber Road and then looked at the residential area between Goring Road and Jarvis Lane.
- 5.16 I finished my visit by driving through the northern part of the neighbourhood area along the B2135 towards Partridge Green. I saw the way in which the landscape in this part of the neighbourhood area had a close relationship with the River Adur to the immediate east.
- 5.17 Given the protracted timescale of the examination, I visited the neighbourhood area for a second time on 14 January 2022. I did not see any significant changes to the neighbourhood area in general, or to the land uses of the proposed local green spaces in particular, which have had any material impact on the outcome of the examination.

6 The Neighbourhood Plan and the Basic Conditions

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document. The wider Statement is also proportionate to the Plan itself.

6.2 As part of this process, I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

6.3 I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in 2021. Due to the date of the submission of the Plan the approach in the submitted Basic Conditions Statement reflects the NPPF 2019. As I have already commented in paragraph 3.4, I will address this matter in the report where it is appropriate to do so.

6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are of particular relevance to the Steyning Neighbourhood Plan:

- a plan-led system– in this case the relationship between the neighbourhood plan, the adopted Horsham District Planning Framework and the adopted South Downs Local Plan;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

- 6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development, which is identified as a golden thread running through the planning system. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.
- 6.7 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a vision for the future of the neighbourhood area. In particular, it includes a series of policies to safeguard and enhance its character and appearance in general, and its relationship with the South Downs National Park in particular. In addition, it proposes a package of local green spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Its paragraph 41 (ID:41-041-20140306) indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise and supported by appropriate evidence.
- 6.10 As submitted the Plan does not fully accord with this range of practical issues. The majority of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social and environmental. It is clear that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy which supports new development in general, and where it safeguards local character in particular (Policy SNDP3). In the social dimension, it includes policies on community facilities (Policy SNDP4), the use of community infrastructure levy funding (Policy SNDP5) and local green spaces (Policy SNDP6). In the environmental dimension, the Plan positively seeks to protect its natural, built and historic environment. It has specific policies on design and character (Policy SNDP3), and on green infrastructure and biodiversity (Policy SNDP1). SPC has undertaken its own assessment of this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.12 I have already commented in detail on the development plan context in Horsham District in paragraphs 5.4 to 5.8 of this report.
- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Subject to the incorporation of the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the two development plans.

European Legislation – Strategic Environmental Assessment

- 6.14 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In order to comply with this requirement HDC issued a 'standard' screening for all neighbourhood plans within the District. It comments that if a neighbourhood plan is allocating sites for development, then it could have a significant environmental impact and a Strategic Environmental Assessment (SEA) is required. The Steyning Neighbourhood Plan does not allocate sites. In this context it has been confirmed by HDC that SEA is not required.

European Legislation – Habitats Regulations Assessment

- 6.16 HDC produced a Habitats Regulations Assessment (HRA) of the Plan in October 2019. It concluded that the Plan is not likely to have significant environmental effects on a European nature conservation site or undermine their conservation objectives alone or in combination taking account of the precautionary principle. As such Appropriate Assessment is not required.
- 6.17 The Assessment takes appropriate account of the significance of the following sites within close proximity of the neighbourhood area:
- Arun Valley Special Protection Area (SPA);
 - Arun Valley Special Area of Conservation (SAC);
 - The Mens Special Area of Conservation (SAC); and
 - The Ashdown Forest Special Area of Conservation (SAC).

- 6.18 In September 2021 Natural England issued a Position Statement on water neutrality. It impacts on the whole of the Horsham District. For all plans and projects, the Statement has triggered an additional requirement to screen for likely significant effects on Arun Valley Special Area for Conservation (SAC), Arun Valley Special Protection Area (SPA) and Arun Valley Ramsar site from the increased demand for mains water in the Sussex North Water Resource Zone.

- 6.19 By way of context, Southern Water supplies water to Crawley Borough, Horsham District, the northern part of Chichester District and parts of the South Downs National

Park within those districts from its Sussex North Water Resource Zone (WRZ). Within this WRZ there are a number of water sources, one of which is a groundwater source at Hardham.

- 6.20 The effect of the Position Statement is that developments within Sussex North WRZ must not add to this impact and one way of achieving this is to demonstrate water neutrality. In addition, the Gatwick Sub regional Water Cycle Study concluded that water neutrality is required for Sussex North to enable sufficient water to be available to the region. Natural England has therefore advised Horsham District and Chichester District Councils, Crawley Borough Council and the South Downs National Park Authority, that development in the Sussex North WRZ part of the Gatwick sub-region must not add to this adverse effect. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.
- 6.21 HDC responded to these changed circumstances by commissioning a further HRA. It was submitted in November 2021. This Assessment is commendably comprehensive. In particular, it addresses the circumstances raised by the Position Statement. It draws the following conclusions:
- as the submitted Steyning Neighbourhood Development Plan will not affect any of the sensitive features of the Arun Valley SAC/SPA/Ramsar site, HDC can consider that, without mitigation, the Plan is not likely to result in a ‘likely significant effect’ (LSE) to Arun Valley SAC/SPA/Ramsar site, when considered alone;
 - with no predicted effects from the submitted Steyning Neighbourhood Development Plan alone and no credible evidence of any real risk from this Plan in combination with other plans and projects, there is no need for the Habitats Regulations Assessment to progress to Habitats Regulations Assessment Stage 2: Appropriate Assessment; and
 - the additional Habitats Regulations Assessment Addendum screening report does not alter the conclusions of the Habitats Regulations Assessment Screening report undertaken by Horsham District Council of October 2019 such that Appropriate Assessment is required.
- 6.22 HDC undertook additional consultation with statutory bodies on the revised HRA. Natural England commented as follows:
- ‘We note that no sites are specifically allocated for development within the Steyning Neighbourhood Plan. Subject to information on the allocations and the avoidance and mitigation measures within the Local Plan being sufficient to ensure that the overarching Local Plan policies and allocations do not result in significant environmental effects (as tested via the Sustainability Appraisal and Habitats Regulations Assessment) Natural England would advise that the Neighbourhood Plan in the absence of development is unlikely to have a significant effect. However, any allocated sites will need to conform to the requirements of the Horsham Local Plan and be subject to a project level HRA.’*

- 6.23 The 2021 HRA recommends that additional text is included in Section 7 of the Plan to address water neutrality. This approach is entirely appropriate and I recommend accordingly in paragraph 7.11 of this report.
- 6.24 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. Indeed, HDC has proceeded in a very responsive way to the water neutrality issue. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of European obligations.

European Legislation – Human Rights

- 6.25 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On the basis of all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.26 On the basis of my assessment of the Plan in this section of my report, I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. In particular, it makes a series of recommended modifications to ensure that they have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and SPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. Whilst this process has not always secured a common approach this sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (41-004-20170728) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. Where necessary I have identified the inter-relationships between the policies.
- 7.6 For clarity, this section of the report comments on all policies whether or not I have recommended modifications in order to ensure that the Plan meets the basic conditions.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial section of the Plan (Sections 1-3)

- 7.8 The initial parts of the Plan set the scene for the range of policies. They do so in a proportionate way. The Plan highlights the links between the Plan's objectives and its resultant policies.
- 7.9 The Introduction provides helpful information about the context of the Plan. It properly identifies when the neighbourhood area was designated (paragraph 1.8), the Plan period (paragraph 1.1), and the neighbourhood area itself (Paragraph 1.9 and Figure 1). It comments about the role and purpose of a neighbourhood plan. Paragraphs 1.13 to 1.16 comment about the development plan context within which the Plan has been prepared. Overall, it is a particularly effective introduction to a neighbourhood plan.
- 7.10 Section 2 comments about the neighbourhood area and a range of matters which have influenced the preparation of the Plan. It relates its history to its current and future roles. A key strength of the Plan is the way in which the issues in Section 2 filter into the Plan's policies.
- 7.11 Section 6 of this report has described the changing circumstances about water neutrality which arose during the examination of the Plan. In order to take account of

the outcomes of the HRA Addendum (November 2021) I recommend that the following elements of supporting text are included in the Plan as follows:

After paragraph 2.42 add the following four additional paragraphs of supporting text

'The neighbourhood area is now affected by recent guidance on water neutrality. In September 2021 Natural England issued a Position Statement on water neutrality which impacts on the whole of the Horsham District. For all plans and projects, this has triggered an additional requirement to screen for likely significant effects on Arun Valley Special Area for Conservation (SAC), Arun Valley Special Protection Area (SPA) and Arun Valley Ramsar site from the increased demand for mains water in the Sussex North Water Resource Zone. The District Council has responded to these changed circumstances by preparing an Addendum to the initial Habitats Regulations Assessment.

With specific reference to Natural England's Position Statement, Steyning lies within this Water Supply Zone which includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar site. As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, Natural England advises that developments within this zone must not add to this impact.

Natural England has advised that this matter should be resolved in partnership through local plans across the affected authorities, where policy and assessment can be agreed and secured to ensure water use is offset for all new developments within Sussex North. To achieve this Natural England is working in partnership with all the relevant authorities to secure water neutrality collectively through a water neutrality strategy. Whilst the strategy is evolving, Natural England has advised that decisions on planning applications should await its completion. However, if there are applications which a planning authority deems critical to proceed in the absence of the strategy, then Natural England advises that any application needs to demonstrate water neutrality.

Developments within Steyning must therefore not add to this impact and one way of achieving this is to demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place'

Update the numbering of the remaining supporting text in Section 2 (from the submitted paragraph 2.43 onwards).

7.12 Section 3 comments about two related matters as follows:

The development of the Plan – Sections 3.1 to 3.7 comment about the way that the Plan was developed. They overlap with the Consultation Statement. Paragraph 3.5 comments specifically about the way in which the emerging Plan sought to relate to the timetable for the emerging Horsham Local Plan.

The Plan's Vision – The Plan sets out a comprehensive vision for 2031 in which Steyning will:

- treasure its heritage, having enhanced it where possible so that the Parish continues to be an attractive place to live, learn, work and visit.
- have a vibrant and prosperous High Street providing both everyday goods and services as well as offering a variety of shopping and dining outlets.
- have housing that meets the needs and aspirations of the local community, that is well designed, promotes environmental efficiency and takes account of the demand on infrastructure. There will be sufficient affordable housing, particularly for key workers.
- have a vibrant economy with innovative new employment opportunities complementing existing work opportunities and with fast and efficient internet connection for home and agile working. It will promote tourism to help support our local economy.
- be a community that continues to encourage social interaction between everyone who lives, works and visits the town, particularly through art, culture, leisure and sport. Our venues will support a diverse range of community events and our open spaces will be safeguarded for their biodiversity and for all to enjoy.
- be a key gateway to the South Downs National Park and the Adur Valley.
- be better connected. It will have a network of well-maintained and safe roads and supported by bridleways, cycle routes and footpaths suitable for all non-motorised users. The Parish will also benefit from improved transport links and more frequent and better-connected bus services will provide greater opportunities for contact with neighbouring towns and villages, both coastal and inland, and reduce reliance on cars.
- take active steps to become a 'climate smart' community, so that it is resilient to the changes and risks caused by climate change, and is taking measures as far as reasonably practicable to reduce its own environmental footprint.

This approach gets to the heart of the localism agenda.

- 7.13 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy SNDP1: Green Infrastructure and Biodiversity

- 7.14 This policy seeks to safeguard and reinforce the green infrastructure and biodiversity in the neighbourhood area. Its approach relies on the supporting text and the Biodiversity Report.
- 7.15 The policy has two related parts. The first offers support to development proposals that protect and enhance green infrastructure, natural capital and valued landscapes. The second offers support to development proposals that result in a net gain in biodiversity.

- 7.16 HDC comment that the policy is unclear about the green infrastructure and biodiversity which is intended to be safeguarded by the policy. In this context, I recommend that the policy and the supporting text are modified so that they clarify the scale and nature of the elements of local biodiversity which are detailed in the submitted Biodiversity report. I also recommend that they are shown on the Policies Map.
- 7.17 The second part of the policy meets the basic conditions.
- 7.18 In general terms the policy will complement the approach taken in national and local planning policies. It will contribute significantly to the achievement of the environmental dimension of sustainable development.

Replace the first part of the policy with:

‘Development proposals which protect and, where practicable, enhance the green infrastructure, natural capital and valued landscape features of the parish, and/or add to the potential for carbon sequestration will be supported’

At the end of paragraph 4.7 add:

‘Policy SNDP1 provides a local dimension to national planning policies and those in the Horsham District Planning Framework. Valued landscape features include, but are not limited to green road verges, accessible green space, public rights of way and their settings, hedgerows, trees, copses and woods, including ancient woodland and orchards and river corridors. The specific habitats protected by this policy are set out in paragraphs 3.1.4 and 5.14 of the Biodiversity Report. They specifically include four Local Wildlife Site (LWS) – Wiston Pond, River Adur Water Meadows & Wyckham Wood and Steyning Coombe and Steyning Round Hill and the Local Geological site at Steyning Bowl and Steyning Round Hill.’

Show the areas concerned on the Policies Map

Policy SNDP2: Responsible Environmental Design

- 7.19 This policy seeks to ensure that new developments are sensitively and responsibly designed. Paragraph 4.8 sets out the expectations which underpin the policy. It comments that ‘new developments are often designed to reflect their immediate site and surrounding built form. This is important but quite often little attention is given to how new built form can work with the environment rather than moving nature out of the way to accommodate it’.
- 7.20 The policy has both a general and a specific element. The general element comments that developments should be designed responsibly, and considering its impact on the environment during its lifetime. The specific element sets out a series of design criteria.
- 7.21 HDC comment that the policy largely repeats policies in the HDPF and suggest that it should be deleted. Whilst that approach would be one way of addressing the issue, I recommend modifications to the second part of the policy so that it would apply in a proportionate way and overlap with the findings of the Steyning Character Assessment.

The combination of these matters would ensure that the policy has the clarity required by the NPPF. In particular the second element of the recommended modification will ensure that the policy is distinctive to the parish.

- 7.22 I recommend a similar modification to the first part of the policy for the same reasons.
- 7.23 Otherwise the policy meets the basic conditions. It establishes a clear context for responsible and environmentally sensitive developments in the parish.

Replace the first part of the policy with: ‘As appropriate to their scale and nature, development proposals should be designed responsibly, and take account of their impact on the environment throughout their lifetime’.

Replace the opening element of the second part of the policy with: ‘As appropriate to their scale and nature, and taking account of the findings of the Steyning Character Assessment 2019, development proposals should:’

Policy SNDP3: Contribution to Character

- 7.24 This policy takes a positive approach to the character of new development. It relies on the excellent Character Assessment which was prepared as part of the wider work on the Plan.

- 7.25 Paragraph 5.4 helpfully sums up the Plan’s approach to this matter as follows:

‘This plan does not seek to require new developments to mirror existing built form. Instead, we believe a more holistic approach should be taken to ensure that the distinctive character of each part of the parish is retained. Key features that make up an area’s character can be influenced by, but not limited to, architectural styles, land use, tranquillity and level of activity’

- 7.26 I am satisfied that the approach meets the basic conditions in general terms. I recommend two modifications. In both cases they ensure that wording used would have the clarity required by the NPPF. In the first part of the policy, I recommend that the reference to the Character Assessment is relocated to an additional part of the supporting text. It consolidates the policy approach rather than defining policy in its own right. I recommend that the wording used in the second part of the policy is refined so that it has clarity for development management purposes.

Replace the first part of the policy with: ‘Development proposals which demonstrate how they will positively contribute towards Steyning’s character will be supported’

Replace the second part of the policy with: ‘Development proposals should respect the amenity of properties in their immediate locality, and respond positively and sensitively to the scale, mass, height, building materials and form of neighbouring properties’

At the end of paragraph 5.4 add: ‘This approach is captured in Policy SNDP3. The first part of the policy refers to the general character of Steyning. In formulating proposals

developers should take into consideration the most recent character assessment of the area (currently the Steyning Character Assessment 2019)'.

Policy SNDP4: Improving Our Facilities

- 7.27 This policy offers support for a range of community facilities and resources. It seeks to consolidate the importance of such facilities as set out in Section 2 of the Plan. In specific terms, it offers support for any upgrades to existing facilities that may be required and the provision of new community facilities.
- 7.28 I recommend that the reference to 'local people' is deleted from part b) of the policy. Whilst it is very likely that local people will make the predominant use the community facilities in the parish, as drafted the policy is worded in a rather clumsy fashion. Otherwise, the policy meets the basic conditions. It will contribute significantly to the delivery of the social dimension of sustainable development.

In part b) of the policy delete 'for local people'

Policy SNDP5: New Community Infrastructure

- 7.29 This policy comments about the way in which SPC will apply funding which it receives through the community infrastructure levy (CIL). It has two related parts. The first comments that any CIL funds raised by development and paid to SPC will be used to support infrastructure projects identified as a priority by SPC. The second part comments that SPC will maintain an Infrastructure Delivery Plan identifying priority infrastructure projects.
- 7.30 The implementation of this approach will be an important task within the Plan period. However, it is a process matter (how SPC will apportion and monitor CIL funding) rather than a land use matter. Whilst the use of CIL monies may well feed into projects which are addressed in Policy SNDP 4, such projects will be assessed in the planning process against the details of that policy.
- 7.31 As such, I recommend that both the policy and the supporting text are deleted from the Plan. However, given the importance of the intended project management role to SPC I recommend that the approach is captured in a separate part of the Plan as a Community Action.

Delete the policy.

Delete paragraphs 6.5 to 6.7.

Insert a new element into the Plan (at Section 8) as follows:

'8. Community Action

This part of the Plan comments about an issue which has arisen as the Plan was being prepared. Whilst it is not a land use matter it is an important issue for the Parish Council. In addition, it may assist with the delivery of the ambitions of Policy SNP4 (Improving our Facilities)'

[Insert paragraphs 6.5 to 6.7 at this point]

In paragraph 6.7 replace 'policy' with 'community action'

Renumber the existing Section 8 of the Plan to Section 9.

Policy SNDP6: Local Green Space

- 7.32 This policy proposes the designation of five local green spaces (LGSs). It comments about the relationship between the identified green spaces and the NPPF. The proposed LGSs are as follows:
- LGSa Bayards Field
 - LGSb Fletchers Croft
 - LGS c Mill Field
 - LGSd Sweetland Field
 - LGS e Rifle Range
- 7.33 The Local Green Space Review (November 2019) sets out details about the various proposed LGSs. In particular, it assesses them against the criteria in the NPPF (paragraph 102). It helpfully identifies the process by which the initial seventeen sites assessed were filtered and reduced to the five proposed in the submitted Plan.
- 7.34 The policy is clearly a significant part of the Plan. It attracted attention at the pre-submission phase, it warrants a special mention in the Consultation Statement, and the interest has continued to the representations made on the submitted Plan.
- 7.35 The five proposed LGSs are each associated with their own characteristics and features. Nevertheless, they fall into three distinct categories. The first is three proposed LGSs on the western edge of the village within the South Downs National Park (LGSs a/c/e). The second is a parcel of land to the immediate west of Laines Road and Combe Road (LGS d). It is also within the National Park. The third is Fletcher Croft (LGS b) within the built-up part of the village.
- 7.36 I looked at the proposed LGSs carefully during my visit. Based on all the available information, I am satisfied that the proposed LGSs b (Fletchers Croft) meets the basic conditions. It is located within a prominent position within the village centre. It provides a focal point for activity around the Church and the library. It also acts as a soft and landscape setting for the Church.
- 7.37 In addition, I am satisfied that its proposed designation accords with the more general elements of paragraph 101 of the NPPF. Firstly, I am satisfied that it is consistent with the local planning of sustainable development. Its designation does not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGS is capable of enduring beyond the end of the Plan period. Indeed, it is an established element of the local environment and has existed in its current format for many years. In addition, no evidence was brought forward during the examination that

would suggest that the proposed LGS would not endure beyond the end of the Plan period.

7.38 The other four proposed LGSs have the following characteristics:

Bayards Field – the site is located to the immediate west of Horsham Road (opposite the Leisure Centre). It is in agricultural use. It forms part of the wider Wiston Estate.

Mill Field – the site is open grassland with an element of equestrian use. A footpath across this field is used by walkers and dog walkers. The path provides an important rural link between the Downs and the town.

Sweetland Field – the site is in agricultural use. It is located to the immediate west of Coombe Road.

The Rifle Range - The site is a natural valley in the Downs landscape. It contains a spring and a pond within a group of trees and hedgerows. The sides of the site are steeply-sloping with mature trees and hedgerows on the boundaries. Part of the area is a former military rifle range. The rifle range was established in 1860 with the main structures appearing around WW2. They were abandoned in the 1980's.

7.39 These four proposed LGSs are located within the South Downs National Park. Proposed LGS a, c and e are owned by the Wiston Trust. Proposed LGS d is privately-owned. It has developer interest.

7.40 Representations were received from both sets of landowners challenging the basis on which the parcels of land were proposed to be designated as local green spaces. Some local residents actively supported the proposed designations. Others raised objections to their designation.

7.41 I sought clarification from SPC on the proposed designation of the four LGSs during the examination. The next sections of this report are based on the matters raised with SPC. They provide a convenient way to address the extent to which the approach in the policy meets the basic conditions.

The extent to which the proposed LGS are consistent with the local planning of sustainable development

7.42 The LGS Review has principally assessed each parcel of land considered to have the potential to be designated as a LGS against the three criteria in paragraph 102 of the NPPF. Nevertheless, paragraph 101 of the NPPF sets out a broader consideration that the designation of LGSs should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. It also requires that LGSs are capable of enduring beyond the end of the plan period.

7.43 In its response to the clarification note, SPC commented that it had prepared the Plan in accordance with national and local planning guidance and that sustainable development was at the heart of its approach.

- 7.44 National legislation has provided considerable flexibility for the preparation of neighbourhood development plans. In particular, there is no requirement to include specific matters such as strategic development in general or housing development in particular. However, the submitted Plan has a very sharp focus on environmental and social issues and is largely silent on the need for strategic development. Whilst this may reflect the context to the plan-making process and the way in which it was intended to dovetail into the local planning context in Horsham District, it offers no explanation about the way in which SPC has grappled with the broader concept of the local planning of sustainable development and how the designation of LGSs would complement such an approach. As such, I have concluded that these four LGS have been proposed for designation as LGSs in isolation and outside this wider context.
- 7.45 SPC also responded to my clarification point about the extent to which the four proposed LGSs are capable of enduring beyond the Plan period by commenting that there is no reason why they could not. It also drew my attention to the view that the potential promotion of land by landowners/developers should not be a reason not to designate a LGS. In general terms, I am not satisfied that SPC has provided a compelling statement on this matter. I comment further about this issue in relation to the Wiston Estate Whole Estate Plan later in this report (paragraphs 7.48 to 7.55).

The added value of LGS designations over and above national park status as required by Planning Practice Guidance

- 7.46 Planning Practice Guidance (ID:37-011-20140306) comments about circumstances where proposed LGS are located within protected landscapes. It suggests that a qualifying body should comment on the added value of a LGS designation over and above protection afforded by national park status.
- 7.47 In its response to the clarification note SPC commented that it had carried out such an assessment on a site-by-site basis. On the one hand, I acknowledge the level of detail included in the LGS Review. However, on the other hand I am not satisfied that SPC has undertaken the type of assessment required by Planning Practice Guidance. Whilst it comments about the details of each of the four proposed LGS in the SDNP it does not provide any compelling additional detail over and above the traditional site-by-site assessment which would have been carried out for a proposed LGS which was not within a protected landscape. As such I am not satisfied that the approach taken in the Plan has identified any additional local benefit which would be gained by their designation as Local Green Space.

The extent to which the proposed package of LGS designations take account of the Wiston Estate Whole Estate Plan

- 7.48 Three of the four proposed LGSs are within the Wiston Estate. The Estate draws attention in its representation to the role and status of the Wiston Estate Whole Estate Plan (WEWEP) in the South Downs Local Plan. The Estate comments about key elements of the WEWEP insofar as it affects the three proposed LGSs within the Estate as follows:

'Project 3 relates to Local Housing Needs. It sets out the vision to create high quality homes for estate workers, local people and new members of the community. In addition, it sets out the proposals for a new community building incorporating office space for the Steyning Downland Scheme and National Park rangers, shared public space and green areas/ orchards. The main area for the delivery of this project is identified as land at Bayards Fields.'

Project 5 relates to Access and Interpretation. It sets out a programme to deliver enhanced access to the estate by connecting the existing parts of the rights of way network and improving car park infrastructure, and a programme to improve the understanding of the natural environment, and the management and stewardship of land. This includes land that at The Rifle Range.'

Project 6 relates to the Environment Bank. It sets out a programme to attract investment arising from development (on and beyond the estate) and to offset its environmental impact. This includes land at The Rifle Range.'

7.49 In its response to the clarification note, SPC comments about the details of the South Downs Local Plan and the specific role played by Whole Estate Plans. It contends that whilst WEWEP will be a material consideration in the determination of certain planning applications they are not part of the development plan. In its representation to the Plan the Wiston Estate comments about its ambitions for some of the sites in its ownership and which are proposed as LGSs.

7.50 There is common agreement that the WEWEP was endorsed by SDNPA in July 2017.

7.51 The most recent guidance produced by SDNPA on Whole Estate Plans (WEP) (March 2022) comments that:

'A WEP is a non-statutory plan that sets out the overall position and aspirations of the estate. There is no prescribed time period a WEP should cover. We are aware estates and institutions often work to longer timescales than others. To enable long-term thinking WEPs should look at least 10 years ahead and ideally further. Post endorsement, WEPs should be considered to be fluid, working documents that can and should be updated over time to reflect changes in circumstance or strategic direction. (Page 6)'

7.52 The supporting text in the SDLP comments in more detail about the relationship between the statutory planning process and WEPs as follows:

'Estates, institutions and farms across the National Park have an important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. Policy SD25 recognises that Whole Estate Plans may be able to demonstrate particular material considerations, relating to the purposes and special qualities of the National Park that justify development outside of settlement boundaries. The Authority will only give weight to such plans where they have been endorsed by the National Park Authority, in line with the Whole Estate Plans Guidelines (paragraph 7.15)'

Where new dwellings are proposed as part of a Whole Estate Plan, these should meet the priority housing needs of the local area, hence should be affordable homes, or accommodate full-time, rural workers as defined by Policy SD32 and its supporting text. An exception may be made where to do so would make the delivery of multiple benefits to ecosystem services and the special qualities of the park unviable, provided clear evidence is provided in the endorsed Estate or Farm Plan (paragraph 7.16)'

- 7.53 On the balance of the information, I am satisfied that the WEWEP is not part of the development plan. As such, I am not required to assess the plan against the basic condition that the Plan is in general conformity with the strategic policies of the development plan. Nevertheless, the submitted Plan does not directly address the WEWEP or comment about the relationship of its proposals to the details in that Plan. This reinforces my earlier conclusions that the submitted Plan does not provide any compelling information about the way in which the four proposed LGS in the South Downs National Plan are capable of enduring beyond the end of the Plan period
- 7.54 I have considered all the information available to me very carefully both in its own right and given the significance of the proposed LGSs to the wider Plan. In general terms, there is no reason to prevent the designation of LGSs within national parks. The South Downs Local Plan includes several designations of this nature and other neighbourhood plans within the National Park have brought forward their own designations. However, in the case of the submitted Plan, the analysis is largely focused on an assessment of the three criteria in the NPPF. It does not address the wider delivery of sustainable development in the parish. Similarly, has not identified any additional local benefit which would be gained by their designation as Local Green Spaces beyond the existing protection provided by their location within the National Park.
- 7.55 On the basis of my findings in this part of the report, I recommend the deletion of the four proposed LGSs in the National Park. I also recommend consequential modifications to the supporting text.

Assessment of the four proposed LGS against the three criteria in paragraph 102 of the NPPF.

- 7.56 The Plan (and the LGS Review) comment in significant detail about these matters. However, given my findings on the more strategic issues, I do not comment about the way in which the four LGS perform against the criteria.
- 7.57 Part of the ethos of the Plan was to carry out a review of its policies once progress had been made on the development plan context (as set out in paragraphs 1.13 and 1.14 of the submitted Plan). In the event that the Plan was reviewed, and a broader assessment was made at that time of the relationship between any proposed LGSs and the way in which they were consistent with the local planning of sustainable development, these matters could be considered afresh both by SPC and the appointed examiner.

The policy itself

- 7.58 The policy comments that development proposals will be considered as though they were proposed on Green Belt. Whilst this reflects the language used in paragraph 103 of the NPPF, it does not provide clarity on the role and purpose of the proposed policy. I recommend that it is modified so that its role and purpose is clear.
- 7.59 In the event that development proposals affecting the designated LGS come forward within the Plan period, they can be assessed on a case-by-case basis by HDC. In particular HDC will be able to make an informed judgement on the extent to which the proposal concerned demonstrates the 'very special circumstances' required by the policy. I recommend that the supporting text clarifies this matter.

Replace Policy SNDP6.1 with: 'Land at Fletcher's Croft (as shown on the Proposals Map) is designated as local green space'

**Replace the second part of the policy with:
'Development proposals on the Fletchers Croft local green space will only be supported in very special circumstances'**

Replace the final sentence of paragraph 6.9 with: 'The site at Fletcher's Croft is considered to meet the criteria for designation as Local Green Space'

At the end of paragraph 6.10 add: 'Policy SNDP6 follows the matter-of-fact approach in the NPPF. In the event that development proposals come forward on the Fletcher's Croft local green space within the Plan period, they can be assessed on a case-by-case basis by the District Council. In particular it will be able to make an informed judgement on the extent to which the proposal concerned demonstrates the 'very special circumstances' required by the policy'

In paragraph 6.11 delete the information for the four LGSs which are recommended for deletion from the Plan

Monitoring and Review of the Plan

- 7.60 Paragraph 1.14 acknowledges that there may be a need for a review of the Plan once the emerging Horsham Local Plan is adopted. This would be good practice in its own right. It would also take account of the wider context of the preparation of Plan itself.
- 7.61 I recommend that the review process is more explicit. This will have two principal benefits. The first will be that the Plan would otherwise quickly become out of date. The second is that the Plan would have the ability to respond positively to the policies in the Local Plan in general, and strategic growth issues in particular.

At the end of paragraph 1.14 add:

'In this context the Parish Council will assess the implications of the adopted Horsham Local Plan on the policies in the Neighbourhood Plan. Where it is necessary to do so, a full or partial review of the neighbourhood plan will commence within six months of the adoption of the emerging Horsham District Local Plan.'

Other matters – General

- 7.62 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned, I have highlighted them in this report. However, other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. It will be appropriate for HDC, SDNPA and SPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies.

Other matters – Specific

- 7.63 HDC and SDNPA have suggested a series of specific amendments and updates to the Plan. I recommend a series of modifications to the Plan insofar as they are necessary to ensure that it meets the basic conditions.
- 7.64 I also recommend other specific matters to ensure that the Plan is as up to date as possible. These recommended modifications take account of the protracted nature of the examination process and are not a reflection on any fundamental inaccuracies in the Plan itself at the time it was submitted for examination.

In paragraph 1.6 replace 'Estate Wide Plans' with 'Whole Estate Plans'

In paragraph 1.12 replace '2019 (NPPF)' with '2021 (NPPF)'

After the first sentence in paragraph 1.12 add: 'The neighbourhood area is partly in Horsham District and partly in the South Downs National Park Authority's administrative area'

In the 'About Steyning' section include a map to highlight the wildlife sites (as described in paragraphs 2.35 to 2.42)

In paragraph 2.43 replace 'he' with 'The'

At the end of paragraph 3.6 add: 'The emerging Horsham Local Plan has not proceeded as quickly as was intended. A draft Regulation 18 Local Plan was published for consultation between February and March 2020. However further progress on the Plan has now been affected by Natural England's Position Statement on Water Neutrality which was issued in 2021. The District Council is currently addressing the significance of this matter on the overall strategy of the Plan'

In paragraph 3.8 reformat the paragraph number.

On the Policies Map acknowledge the relevant designations from the South Downs Local Plan.

Other Matters – Site Specific

- 7.65 The representation from Richborough Estates proposes the allocation of land at Glebe Farm on the north east boundary of the town adjacent to the A283 bypass and Kings Barn Lane. It would accommodate around 240 dwellings.
- 7.66 Whilst I have considered this representation, it is not within my remit to include new elements into the Plan as part of the examination process. SPC has taken a view that it does not wish to allocate housing sites as part of the neighbourhood plan process. In this context, neither statutory bodies nor the public have had the opportunity to comment on such proposals.
- 7.67 In any event, a proposal for 240 homes would be of a strategic nature. In a broader context, and as paragraph 5.4 of this report has already commented, the figure of 1500 new homes in the smaller towns and larger villages required in the HDPF has now largely been reached. Furthermore, it is likely to be exceeded assuming that the referendum processes for the next batch of neighbourhood plans in the District (which have already been through their examination processes) are successful. As such, there is no strategic need for development of this scale in the parish at this stage.
- 7.68 Nevertheless I have made separate recommendations in paragraphs 7.60 and 7.61 about the potential need for a review of any ‘made’ neighbourhood plan once the emerging Local Plan has been adopted.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community.
- 8.2 Following the examination of the Plan, I have concluded that the Steyning Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications. Whilst I have recommended modifications to delete four of the five LGSs proposed, I am satisfied that the remainder of the Plan retains a robust structure and approach which will add value to the existing development plan in the parish.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to Horsham District Council and to the South Downs National Park Authority that, subject to the incorporation of the modifications set out in this report, the Steyning Neighbourhood Development Plan should proceed to referendum.

Referendum Area

- 8.4 I am required to consider whether the referendum area should be extended beyond the Plan area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as designated by HDC and SDNPA on 21 May 2018 and on 23 March 2018 respectively.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in an efficient manner.

Andrew Ashcroft
Independent Examiner
13 April 2022