

# **Horsham District Local Development Framework Facilitating Appropriate Development Supplementary Planning Document**

## **Consultation Statement**

This statement has been prepared by the Council in accordance with Regulation 17 and Regulation 18 (4) of the Town and Country Planning (Local Development) (England) Regulations, 2004 and the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

The Facilitating Appropriate Development draft Supplementary Planning Document (SPD) sets out the requirements against which planning applications for development, put forward by landowners/developers as a response to the evolving circumstances, on greenfield and brownfield sites which adjoin defined settlement boundaries sites in the District, will be considered.

The document has arisen from the need to provide 'flexibility' to ensure that there is sufficient housing supply during the life of the existing adopted Core Strategy (2007). The Inspectors' Report on the Examination into the Core Strategy in 2006, found that there was a need for more flexibility in order to make the policy stance with regard to housing provision sound. Originally, it was considered a Reserve Housing Sites DPD was the way to address this. However, due to changing circumstances a more proactive way forward, in the form of this SPD, was proposed.

### **Pre-production Consultation**

On the 9<sup>th</sup> December 2009 a version of the draft SPD was presented to the Strategic Planning Advisory Group (SPAG) for consideration. This group is open to all Council Members and acts as an advisory body for the Cabinet Member for Strategic Planning. As a result of the discussions at this meeting, Members agreed to put an amended version, before Cabinet with a recommendation to agree to publish the document.

### **Public Consultation on the draft SPD**

Following approval by the Cabinet on the 8<sup>th</sup> January 2009, the Facilitating Appropriate Development SPD was published for public consultation on the 16<sup>th</sup> January for a period of six weeks until 27<sup>th</sup> February 2009. The publication and subsequent consultation period was advertised in the West Sussex County Times.

The following documents were made available for public consultation:

- Facilitating Appropriate Development draft SPD
- Comments forms, detailing consultation procedures

These documents were made available at the following key locations

- **Horsham District Council Offices**, Park North, North Street, Horsham
- **Horsham Library & Help Point**, Lower Tanbridge Way, Horsham
- **Storrington Library & Help Point**, Ryecroft Lane, Storrington

In addition the document was also available to view at other libraries in the District.

The draft SPD was made available on the Council's website, along with guidance on how to submit a comment.

The persons and organisations that were specifically consulted after the publication of the draft SPD are shown in Appendix 1 along, with details of how they were consulted.

There were 44 contributing consultees to the document; consisting of official bodies, Parish Councils, agents, housebuilders, and a number of residents. Appendix 2 provides a summary and analysis of the representation and shows how the issues that they raise have been addressed by the Council in the final version of the SPD.

## Appendix I

| Consultee                                | How Consulted  |
|--|----------------|
| <b>Horsham District Council Officers</b> | Draft SPD sent |
| Head of Strategic & Community Planning   |                |
| Head of Development                      |                |
| Development Control Team Leader (South)  |                |
| Development Control team Leader (North)  |                |
| <b>Statutory Consultees</b>              | Draft SPD sent |
| Planning Inspectorate                    |                |
| GOSE                                     |                |
| West Sussex County Council               |                |
| Southern Rail                            |                |
| SEERA                                    |                |
| English Heritage                         |                |
| Environment Agency                       |                |
| Natural England                          |                |
| Highways Agency                          |                |
| Thames Water Property                    |                |
| KTI Energy Ltd                           |                |
| SEEDA                                    |                |
| Surrey County Council                    |                |
| Amberley Parish Council                  |                |
| Ashington Parish Council                 |                |
| Ashurst Parish Council                   |                |
| Billingshurst Parish Council             |                |
| Bramber Parish Council                   |                |
| Broadbridge Heath Parish Council         |                |
| Coldwaltham Parish Council               |                |
| Colgate Parish Council                   |                |
| Cowfold Parish Council                   |                |
| Henfield Parish Council                  |                |
| Itchingfield Parish Council              |                |
| Lower Beeding Parish Council             |                |
| North Horsham Parish Council             |                |
| Nuthurst Parish Council                  |                |
| Parham Parish Council                    |                |
| Pulborough Parish Council                |                |
| Rudgwick Parish Council                  |                |
| Rusper Parish Council                    |                |
| Shermanbury Parish Council               |                |
| Shipley Parish Council                   |                |
| Slinfold Parish Council                  |                |
| Southwater Parish Council                |                |
| Steyning Parish Council                  |                |
| Storrington & Sullington Parish Council  |                |
| Thakeham Parish Council                  |                |
| Upper Beeding Parish Council             |                |

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|--|---|
| Warnham Parish Council                         |   |
| Washington Parish Council                      |   |
| West Chiltington Parish Council                |   |
| West Grinstead Parish Council                  |   |
| Wiston Parish Council                          |   |
| Woodmancote Parish Council                     |   |
| Denne Neighbourhood Council                    |   |
| Forest Neighbourhood Council                   |   |
| Trafalgar Neighbourhood Council                |   |
| <b>General Consultees</b>                      |   |
| Federation Of Sussex Amenities Societies       | Letter regarding availability of and how to view the Draft SPD sent         |
| Home Builders Federation                       |   |
| Sussex Downs Joint Committee                   |   |
| The Horsham Society                            |   |
| Southwater Action Group                        |   |
| Weald Vale Association                         |   |
| Pulborough Community Partnership               |   |
| Henfield Community Partnership                 |   |
| Crawley Borough Council                        |   |
| Thakeham Village Action                        |   |
| Sussex Wildlife Trust                          |   |
| <b>Agents/developers/landowners</b>            |   |
| DMH Stallard                                   |   |
| Bell Cornwell Partnership                      |   |
| Evison & Co.                                   |   |
| Diocese of Chichester                          |   |
| Christ's Hospital Foundation                   |   |
| Countryside                                    |   |
| Henry Smith                                    |   |
| Berkeley Strategic                             |   |
| Bradburys Chartered Surveyors                  |   |
| DMS Stallard                                   |   |
| CB Richard Ellis                               |   |
| DC Planning Ltd                                |   |
| Savills  |   |
| Humberts Leisure                               |   |
| Rydon Homes Ltd.                               |   |
| Barton Wilmore                                 |   |
| Planning Perspectives                          |   |
| Charles Planning Associates                    |   |
| Boyer Planning Ltd.                            |   |
| Evison & Company                               |   |
| Taylor Wimpey                                  |   |
| Keith Potts Independent Town Planning Services |   |
| Richard Maile                                  |   |
| Sunley Group                                   |   |
| Strutt & Parker                                |   |
| Daniel Frisby                                  |   |
| <b>Residents</b>                               | Letter regarding availability of and how to view the Draft SPD sent (and if |
| E. Adams                                       |   |
| R. Anscombe                                    |   |
| A. Agarwal                                     |   |

|                           |                                  |
|---------------------------|----------------------------------|
| M. Ainscough              | requested copy of document sent) |
| J. Armour – Milne         |                                  |
| D.G. Bagott               |                                  |
| L. & N. Bailey            |                                  |
| J. & B. Balchin           |                                  |
| S. & J. Bartlett – Blythe |                                  |
| J. Beasley                |                                  |
| S. Bedford                |                                  |
| E. Bendall                |                                  |
| V.P. Bentley              |                                  |
| R. Bentley                |                                  |
| S. Bidwell                |                                  |
| T. Blair-Fish             |                                  |
| C. Blake                  |                                  |
| A. Boam                   |                                  |
| Z. Bonaface               |                                  |
| P. Bonaface               |                                  |
| K. Boosey                 |                                  |
| S. Bouchier               |                                  |
| J. Brennan                |                                  |
| M. & N. Broad – Bishop    |                                  |
| J.W. Brooker              |                                  |
| C. Brown                  |                                  |
| N. Bryant                 |                                  |
| M. Burchett               |                                  |
| S. Butler                 |                                  |
| R. & J. Cameron           |                                  |
| R. & E. Cardon            |                                  |
| Mr. Carter                |                                  |
| B. Chaston                |                                  |
| P. Chaston                |                                  |
| T. Cherriman              |                                  |
| V. E. Collier             |                                  |
| F. N. Copley              |                                  |
| Mr. & Mrs. Coppard        |                                  |
| J. Cummins                |                                  |
| T. Dale                   |                                  |
| B.J. Dalling              |                                  |
| K. Dawes                  |                                  |
| T. Dawson                 |                                  |
| A. Dier                   |                                  |
| A. Dorset                 |                                  |
| M. Drake                  |                                  |
| J. Easton                 |                                  |
| C. Eastwood               |                                  |
| K. Ede                    |                                  |
| S. Ede                    |                                  |
| L. Edwards                |                                  |
| P. & M. Elcock            |                                  |
| J.H. Ellson               |                                  |
| C. Emmott                 |                                  |
| J. English                |                                  |
| J. Evans                  |                                  |

|                                 |  |
|---------------------------------|--|
| M. Evison                       |  |
| F. Faulkner                     |  |
| C.M. & R.M. Fennell             |  |
| J. Forrester                    |  |
| Mr. Fox - Mitchell – Alexander  |  |
| A. & M. Frost                   |  |
| G. Harwood & D. M. Shillingford |  |
| J.M. Goddard                    |  |
| J. & S. Godfrey                 |  |
| H. Goodwin                      |  |
| W. Gordon                       |  |
| D. Graham                       |  |
| R. Green                        |  |
| H. Green                        |  |
| D.B. Haines                     |  |
| S. Haines                       |  |
| S.M. Hanks                      |  |
| C.J. Hanks                      |  |
| J. Hardy                        |  |
| J. Harries- Rees                |  |
| G.M. Harris                     |  |
| A. & M. Harrison                |  |
| I. Hayward                      |  |
| O. Hayward                      |  |
| C. Hazelden                     |  |
| Mr. & Mrs. Hemsworth            |  |
| A. Henderson                    |  |
| G. Heyes                        |  |
| J. Hnatow                       |  |
| J. Hnatow                       |  |
| D. Hodges                       |  |
| E. & K. Holder                  |  |
| T. Holloway                     |  |
| S. Holloway                     |  |
| K. Horniblow                    |  |
| J. Hosford                      |  |
| J. & P. Huggett                 |  |
| M. & A. Hyde                    |  |
| T. & P. Jackson                 |  |
| A. Jackson                      |  |
| R. Jarman                       |  |
| V. Johnson                      |  |
| P. Johnstone                    |  |
| J. Johnstone                    |  |
| A. Jones                        |  |
| A. Kilner                       |  |
| D. Kitcher                      |  |
| N. Kneen                        |  |
| R.J.Knight                      |  |
| J. Kulakowski                   |  |
| K. Lang                         |  |
| P.M. Leavey                     |  |
| W. Lester                       |  |

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|----------------------|--|
| C.M. Lewis           |  |
| I.J. Lightowler      |  |
| P. Lloyd – Bostock   |  |
| J. Lockyear          |  |
| M. Lovell            |  |
| K. MacDonald         |  |
| S. Macintosh         |  |
| D.M. Makepeace       |  |
| R.G.W. & M. Maltby   |  |
| A. Manuel            |  |
| A. & A. Mariner      |  |
| A. Marshall          |  |
| D. Martin            |  |
| E. F. Matthews       |  |
| E. McDougall         |  |
| I. McDougall         |  |
| J. McGarth           |  |
| P. McHoy             |  |
| B. Meinecke          |  |
| M. Merrifield        |  |
| J. Miller            |  |
| A. & J. Mitchell     |  |
| B. T. Mold           |  |
| E. Morris            |  |
| L. Morris            |  |
| S. Morris            |  |
| S. Muirden           |  |
| M.C. Munday          |  |
| J. & R. Nice         |  |
| S. Nichols           |  |
| J. Nickolson         |  |
| A.R. & M.E. Norman   |  |
| J. R. Norman         |  |
| K. Norrish           |  |
| S. Nye               |  |
| T. Olney             |  |
| S. Over              |  |
| L. Page              |  |
| V.M. Paine           |  |
| S. & K. Parker       |  |
| K. Parker            |  |
| O. Parker            |  |
| J. Pavledis          |  |
| Mr. & Mrs. Pennicard |  |
| C. Phillips          |  |
| E. A. Prescott       |  |
| C. Preston           |  |
| P.M. & E. C. Price   |  |
| Mr. & Mrs. Pulling   |  |
| A. Purches           |  |
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| J. Ralph             |  |
| M. & A. Reid         |  |

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|-----------------------|--|
| J. Richardson         |  |
| B. Ricket             |  |
| P.G. Ricket           |  |
| S. Ridgely            |  |
| K.P. Ripp             |  |
| D. Ritter             |  |
| B.J.A. Roberts        |  |
| G. Robinson           |  |
| Mr. & Mrs. Robinson   |  |
| M. Root               |  |
| Mr. & Mrs. Sayers     |  |
| S. Scutt              |  |
| J. Seal               |  |
| P.J. Searl            |  |
| J. Searles            |  |
| R. Searles            |  |
| G. Sharman            |  |
| D. Sharp              |  |
| J.M.A. Sharp          |  |
| Mr. & Mrs. Shearing   |  |
| P. Sheehan            |  |
| R. & P. Shelton       |  |
| K. & B. Short         |  |
| D. Shucksmith         |  |
| C. Simmons            |  |
| J. Simpson            |  |
| F. Skilton            |  |
| K. Slaughter          |  |
| Y. Slocombe           |  |
| P.M. Smith            |  |
| I.D. & S.J. Smith     |  |
| R. Sossi              |  |
| M. Spriggs            |  |
| S. Stanbridge         |  |
| J. Stewart            |  |
| M. Stiller            |  |
| N.C. & P.L. Stredwick |  |
| S. Strong             |  |
| J. Tadman             |  |
| M.B. Tennant          |  |
| I. Thomson            |  |
| N. Tidey              |  |
| T. Blair – Fish       |  |
| M. Tooth              |  |
| P. Towler             |  |
| N. Venning            |  |
| P. & M. Vincent       |  |
| R. & A. Wales         |  |
| S. Weeden             |  |
| D. Weedon             |  |
| M. Whitehead          |  |
| D. Williams           |  |
| S. Williams           |  |

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|----------------------|--|
| P. Willmott          |  |
| D. Winfield          |  |
| M. Winfield          |  |
| B. Winstone          |  |
| R. & J. Woods        |  |
| Mr. & Mrs. Woolridge |  |
| D. Wright            |  |
| K. Wright            |  |
| W. Wright            |  |

## **Appendix 2**

### **Analysis of Representations; Facilitating Appropriate Development Draft Supplementary Planning Document (SPD)**

There have been 44 contributing consultees to this document. These consist of official bodies, Parish Councils, agents, house builders, and a number of residents. A list is attached. It is difficult to classify the comments into straightforward letters of objection or support. Clearly, there is some support for the document and the principles behind it, but within that, criticism of particular aspects, or even whole areas, of the content. In some cases, objection has arisen because of how a particular site maybe viewed in light of the document; from both a landowner and local resident perspective. Nevertheless, the responses have been well thought out and raise a number of issues which will need to be considered prior to adoption of the document. This report is set out so that the nature of responses to a particular issue, this includes the whole document, or paragraph are given, and below in italics an initial officer comment / view on the response is given.

#### **Whole document/ Chapter 1: Introduction**

The comments in this area tended to relate to the whole document and principle behind it. In terms of numbers, there was a relatively even split of objectors and supporters.

There is support for a flexible, pro-active approach.

A clearer explanatory statement of the challenge, housing land supply, and the planning response, controlled flexibility, is requested. SEERA recommend that the background to 5 year housing land supply, in terms of Regional Spatial Strategy and the South East Plan, needs to be addressed in the document. West Sussex County Council broadly support the document with the caveat the District need to be sure that criteria set out in PPS12 can be met and demonstrated to an Inspector.

In paragraph 1.1 it is suggested that reference to brownfield sites is made; so that it reads:

“The document, then, sets out the requirements against which planning applications for development on greenfield and brownfield sites which adjoin defined settlement boundaries in the District put forward....., will be considered.”

There is, however, greater concern from others. Billingshurst Parish Council see the document as a knee jerk reaction to the current economic climate, which strays into issues better dealt with through Development Plan Document (DPD) policies. This view is echoed by others, including planning agents, who considered that the document will not provide the flexibility that the Inspectors were looking for nor will it provide certainty. The existing plan led approach should prevail.

It is pointed out that as an SPD can not create new policy; it should provide greater detail on existing policies. Some therefore question the need for an SPD, as it is just repeating existing policies. Others are concerned that the document goes beyond the remit of an SPD; it is more of an “interim planning policy”.

It is also requested that all other sites should be 'used' prior to looking at greenfield sites.

*Comment:*

*Although the FAD SPD would allow development on greenfield sites outside of built up area boundaries, something not usually considered acceptable, it is considered that the Council must pursue the FAD SPD as a means of providing the flexibility that the Inspectors found lacking at the time of the Report on the examination into the Core Strategy (2007); without this flexibility the Council's policy would be unsound. It can be seen within the existing policies that there is scope for limited expansion of Category 1 settlements and for exceptions to be made to allow for local needs proposals in Category 2 settlements. The document could be amended to make this point clearer.*

*It would not be unreasonable to include specific reference to brownfield sites adjoining built up area boundaries within the context of this document. There are existing policies relating to brownfield sites which is why they were not specifically referred to in the original draft, but for purpose of clarity the words "...and brownfield sites that adjoin defined BUABs", could be added without conflicting with policy.*

## **Background**

There were fewer comments relating solely to the background.

There was one specific comment in support to what is considered a responsive, proactive approach that will put the Council in a stronger position; offering a more flexible, pragmatic approach that the Reserve Housing Sites DPD.

Objectors argued that the SPD does not accord with Policy CP4 or CP9; and is not subject to vigorous vetting, public examination. There is concern that there is no evidence that there is a 'floors not ceilings' approach to housing numbers. In any case, local development plan (LDP) policies apply which discourage development outside of BUABs and on greenfield sites. It is also unclear whether the intention is to make up for a shortfall or to provide more housing land; this should be clarified. The criteria are vague and it is not clear who will interpret them.

The agents representing the owners of the Manor Close site, Henfield, have asked for the reference to it in paragraph 1.4 to be deleted.

*Comment:*

*The background to the document is relatively clear, and raised few comments. The need for the document is referred to above. Where it is possible the setting out of the text and additional detail could be added to overcome some of the points raised. The reference to Manor Close could be deleted.*

## **Consultation Process**

There were a number of objections and comments relating to the consultation process. Most felt the period was too short. In addition, the point was raised that had

the document been a DPD there would have been full consultation and an examination in public.

*Comment:*

*The consultation process followed the statutory process. We endeavoured to be flexible where necessary. This is a wider issue which can not be dealt with in the context of this document.*

## **Chapter 2: Facilitating Appropriate Development: The Approach**

There were a couple of clear letters of support, along with over twice as many objections and a similar number of more general comments.

Supporters commented that a criteria based selection of relatively small scale greenfield sites appeared to be a sound option for present and near future difficulties.

It was felt that the movement of employment uses should only take place if unneighbourly. It was also commented that the proposals could lead to an imbalance between housing and employment provision. Indeed it is questioned why employment uses are being considered at all in this document. The overall vision for each town/ village should be taken into account.

In paragraph 2.1 it is suggested that the word “solely” is deleted and that “...and brownfield sites that adjoin defined BUABs” is added. Reference should also be made to existing policies that allow for development on previously developed land outside settlements.

Going a stage further, it is also argued that all development should be on brownfield sites and that greenfield development should be dealt with through the Site Specific Allocations of Land DPD. It is argued that the approach is inconsistent with the Core Strategy and therefore departs from existing policy.

*Comment:*

*Once again the overall principle of the document is questioned and whether it creates new policy. It is reiterated that there is a need for flexibility and that this is stated in existing policy.*

*Reference to brownfield sites alongside greenfield sites could be included in the document for purposes of clarity.*

*Reference to unneighbourly employment sites can also be justified, although this may not necessarily be the case.*

### **Deliverability**

There is clear support for the need for sites to be “deliverable”. It was commented that this lies at the heart of maintaining a rolling 5 year housing land supply.

One agent considered that for housing to come forward in the time frame up to 2013 category 2 settlement need to be brought into contention. Another argued that reference to 2013 should be taken out as this is against the premiss of a rolling 5 year housing supply.

Objections also related to the idea the idea of reducing the time given in the time limit condition for starting development; it would set up an impossible time frame for dealing with conditions, would add complexity and increase uncertainty.

*Comment:*

*The issue of deliverability was not really objected to; objections related more to reference to the period up to 2013 and the idea of reducing the time limit on starting development. In light of the anticipated short life span of the document reference to the period up to 2013 is not considered unreasonable, though reference to the Core Strategy Review could be added. The idea of the possibility of reducing the time limit on starting development should remain as this will ensure that developers are clear that proposals must be deliverable and that planning permission should not be sought in the context of this document with the intention of holding onto it for the future.*

## **Sustainability**

This area of the approach has raised a lot of feedback and a number of concerns. The comments should be considered along with comments relating to Appendix A (these were all objections).

There was some general support for sustainability to be considered.

Some felt each site should be rigorously tested; detailed and up to date information should be used. Reference to the work done at the time of the now defunct RHS DPD should not be used or relied upon as this wasn't tested. Some felt the proposed way of testing was too crude and subjective; there was no substitute for detailed analysis.

There is some concern that there aren't enough suitable sites in suitable locations, as found when RHS DPD was being discussed. Therefore sites would be unsustainable, or not the most sustainable.

There is concern regarding the practicality of comparing sites; how this would work and necessity of it.

Comments were made regarding the Category 1 and Category 2 settlements. Those related to supporting sites adjacent to Category 1 settlements as these were more sustainable.

The Highways Agency commented that a Transport Statement or Transport Assessment would be required in any case. The County mentioned that non motorised user transport should be referred to.

*Comments:*

*It is considered that a sustainability report is necessary and will add to the information provided by applicants. It is acknowledged that there will need for information to be up-to-date and not rely on previously accumulated information. It is considered concerns relating to the need for up-to-date information can be addressed by amending the wording in the document.*

*The existing policies make clear that Category 1 settlements are the most sustainable in the District.*

## **Scale**

The responses to this area were mainly objections; some on the basis the figure was too high, some too low and some saying that you shouldn't have a figure.

Several agents and the County Council pointed out that a 'strategic' development would normally be 500 dwellings. Justification, therefore, for whatever figure the Council decided would need to be better; this was considered essential by many of those who commented. Some felt that the approach as proposed was disproportionate. It was suggested that the size of the existing settlement (possibly in terms of population and number of existing dwellings) should be taken into account.

The Highways Agency was concerned that if two settlements close together each added 200 units the cumulative impact on infrastructure would be greater.

There was some concern regarding the early release of future strategic sites.

### *Comments:*

*It is acknowledged that 200 units would not normally be considered a 'strategic' level of development, as pointed out by West Sussex County Council amongst others. It is considered that having a figure would provide certainty as to an upper limit of development however it is acknowledged that the scale should be relative to the size of the existing settlement. It is therefore considered that a figure of around 150 which relates back to the largest allocated site (apart from the strategic sites) is referred to in the criteria in chapter 3 to give that certainty, but that the text in chapter 2 is amended to emphasize the need to look at the scale of development in relation to the size and facilities available in the settlement to which the development is attached.*

## **Chapter 3: Facilitating Appropriate Development: Criteria**

Overall, there were mainly objections to the criteria; however this perhaps does not reflect the nature of the points as some related to particular criteria and others the overall idea of criteria.

There was concern that the criteria do not comply with LDP policy. It was suggested that the criteria should be reviewed. Some felt there were too many criteria; others that they repeated existing policy. It was pointed out that one should be careful placing too many constraints, particularly off site contributions, in current market conditions.

In relation to specific criteria, the following comments were made:

1. – Concern that development of greenfield sites adjacent to Category 1 settlements will lead to urban sprawl. Some support for contiguous boundary in interest of proper planning and integration with existing urban form. Suggested should omit reference to CP5 and CP8.

2. – Reference to category 2 settlements should be excluded. It was suggested this criteria should be omitted. Warnham Parish Council felt emphasis should be given to local need only, that in effect the land must be free. The Chichester Diocese argue that the definition of local need will need to be interpreted more flexibly if category 2 settlements are going to contribute to supply.

3. – Note; the issue of scale was considered under Chapter 2 and raised the issue of the number of dwellings. One comment received here; support subject to reduction to 150; another 100. It was suggested that the words “individually or cumulatively” should be removed along with any reference to category 2 settlements. It was suggested this criteria should be omitted.

4. – Omit.

5. – Suggested rewording to say, “Any development proposal should not prejudice comprehensive, long term strategic development proposals.” Billingshurst Parish Council considered that this will allow part of a strategic site to come forward without proper masterplanning.

6. – Supported. Reference to policy DC11, Historic Parks and gardens should be included. It was suggested by another that this could be deleted, as just restates existing policy.

7. – It was felt that the overall number of criteria should be reduced and to that end this could be removed. Warnham Parish Council was encouraged by the inclusion of this criterion. English Heritage asked that a reference to heritage be made; and DC11, Historic Parks and Gardens. It was suggested by another that this could be deleted, as just restates existing policy.

8. – Should include protecting the setting of listed buildings here. Criteria 8, 9 and 10 are required as part of validation process, therefore could be removed.

9. – Sussex Wildlife Trust (SWT) would like to see biodiversity gains from all development in line with PPS 9 and contributing to national BAP targets. This had support. A call to include the words “and enhanced where possible” was made. Criteria 8, 9 and 10 are required as part of validation process, therefore could be removed.

10. - Sussex Wildlife Trust (SWT) would like to see biodiversity gains from all development in line with PPS 9 and contributing to national BAP targets. This view had support. Policy DC2, Landscape Character should be added. Criteria 8, 9 and 10 are required as part of validation process, therefore could be removed.

11. – Some support for sustainability report; provided new and up dated. The report should include public rights of way. A comment was received stating that 11, 12 and 15 should form part of one aim as all fall within sustainable requirements of an application. There was concern expressed regarding the scoring for the sustainability report.

12. – Suggestion that sites where walking to a wide range of facilities “will be”, not “maybe”, considered preferable. It was felt that there should be some sensitivity testing to take into account the specific characteristics of the sites adjoining the same settlements. Distances should relate to the whole site not just the closest point. A comment was received stating that 11,12 and 15 should form part of one aim as all

fall within sustainable requirements of an application. The Highways Agency supportive of this.

13. – The County Council suggest a reference to Green Infrastructure Planning is made. A comment that flexibility is required was received.

14. - It was felt that the overall number of criteria should be reduced and to that end this could be removed. A comment was also received relating to market conditions and there impact.

15. – A suggestion that a lower limit of a third should be set. Another comment that this was too vague and wouldn't lead to balanced communities. A comment was received stating that 11, 12 and 15 should form part of one particular aim as all fall within sustainable requirements of an application. It has been suggested that the reference to policy DC18 is deleted.

16. - It was suggested in order to reduce the number of criteria this could be omitted.

17. – The Highways Agency suggests that there is a requirement for residential travel plans. Change “transport contributions” to “infrastructure contributions”. Add on to comment regarding Green Travel Plan, “...that exceed Travel Plan thresholds”.

18. - It was commented that sites must be deliverable and achievable in the period to 2013. The Highways Agency advised that deliverability should be looked at from a transport perspective. It was suggested that this criteria should be deleted as it represented new policy development. Although appears logical in terms of the Core Strategy review, it was considered that this could hasten sub-optimal developments and that there were ways of keeping permissions “alive”.

#### *Comments:*

*The issue of compliance with local development plan policy was raised. This has been dealt with elsewhere. The criteria all relate to existing policies and these policies are referred to in the criteria. The point of the criteria is to give more detail to how FAD relevant applications are going to be dealt with, and therefore there is the need to set this out in detail and have the information in one place. The document does not repeat all the policies in full but is required to give enough information for readers to be able to find them.*

*Some of the criteria could be changed in light of comments received. It is considered this would add further clarity. In other cases, such as comments relating to Category 2 settlements, it was considered that changes suggested would alter the existing policy and that the issues were better dealt with under the Core Strategy Review.*

#### **Chapter 4: Conclusion**

A few comments were received in relation to the conclusion. There were two in support of the pro- active stance and an objection on the basis that the SPD is not in conformity with the Core Strategy. A further comment reminded that paragraphs 4.2 to 4.4 should be removed from the adopted version of the document as these referred to the consultation period.

*Comments:*

*The issue of the need for the document has been dealt with elsewhere.  
The document will be altered to reflect its adopted status.*

### **Appendix Sustainability Report: Criteria**

A couple of points of detail regarding the title were made; is it Appendix A? and by adding the word criteria this could cause confusion with the criteria in chapter 3.

Only objections were received in relation to Appendix A (although it is noted that some positive points were made under the sustainability heading in chapter 2).

Criticisms included;

- too vague and subjective; need objective indicators;
- the need for these criteria is questioned as any planning application would be expected to have regard to the Council's standard list and applications are considered in light of the normal DC policy context;
- concern regarding quantitative scoring of qualitative matters and thus the value of each;
- there is too much emphasis on the interpretation given by Officers;
- confusing;
- lack of public transparency;
- the document should be subject to a sustainability appraisal as it develops policy further.

A suggestion was made that all 12 points should have a minimum score target and that if the target isn't reached in respect of any of the 12, then the site should be deemed unsuitable. This would go some way to balancing out the importance of each criteria. Indeed there were comments of concern relating to the importance of each indicator.

It was commented that we need our own experts to tell us whether a development is sustainable (for example, West Sussex County Council highway officers).

In relation to specific criteria the following comments were made.

- Landscape and townscape character – should include reference to archaeological sites and ancient monuments;
- Historical Environment – should include reference to archaeological sites and ancient monuments;
- Water Quality – needs to refer to the provision of water and sewerage infrastructure to service the development;
- Road/ Public Transport – could have a negative score.

*Comments:*

*The wording of the criteria could be changed to include some of the additions suggested.*

*It is still felt that a sustainability report is necessary and will add to the information provided by applicants. It is acknowledged that there will need for information to be up-to-date and not rely on previously accumulated information. The scoring criteria*

*could be altered in respect of some of the points to allow for both negative and positive scoring.*

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