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# **Report on Southwater Neighbourhood Plan 2019 - 2031**

**An Examination undertaken for Horsham District Council with the support of the Southwater Parish Council on the March 2019 Submission version of the Plan.**

Independent Examiner: Derek Stebbing BA(Hons) Dip EP MRTPI

Date of Report: 15 May 2020

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## **Main Findings** - Executive Summary

From my examination of the Southwater Neighbourhood Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – Southwater Parish Council (the Parish Council);
- the Plan has been prepared for an area properly designated – the Neighbourhood Plan Area, the boundary of which excludes some land at the south of the Parish, as identified on the Map at Page 3 of the Plan;
- the Plan specifies the period to which it is to take effect – from 2019 to 2031; and,
- the policies relate to the development and use of land for a designated Neighbourhood Plan Area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should encompass the area formerly within Shipley Parish that is now covered by Southwater Parish Council, to take account of the extension to the Parish boundary made on 5 February 2019.

## **1. Introduction and Background**

### *Southwater Neighbourhood Plan 2019-2031*

- 1.1 Southwater Parish is located some 4 miles south of Horsham, and comprises the settlements of Southwater village, Christ's Hospital, Tower Hill, Two Mile Ash and Newfoundout. It is a semi-rural area situated in the Low Weald with a population of 10,730 (2011 Census) in 3,840 households. By 2018, the population is estimated to have grown to around 11,300 persons. Southwater is 14 miles north of Worthing, 20 miles south-west of Gatwick Airport and 23 miles south-east of Guildford.
- 1.2 There is evidence of a settlement at Southwater from the Roman period. During the Saxon and Medieval periods the area was extensively wooded but provided land for the summer grazing of livestock. These seasonal activities gradually led to more permanent agriculture and the first development of the village of Southwater, which was first recorded in 1346 as 'Suthwatre' (meaning South of the water, referring to the River Arun).

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- 1.3 One of the oldest buildings in the Parish is Great House Farmhouse, a Grade II\* listed building built up from a late medieval structure during the Tudor period. Whilst mixed agriculture was the main industry for several centuries, much of Southwater's more recent economic growth has been based on the brick industry which prospered in the local clay-pits from the 1890's until the 1980's. Following the closure of the brickworks, the site has been transformed to become the Southwater Country Park, which is now a major recreational and leisure facility. The largest employers in the Parish are now Christ's Hospital School and the RSPCA, whose headquarters are in Southwater. The two business parks in Southwater also provide significant local employment in a range of businesses.
- 1.4 Christ's Hospital School is a charitable co-educational independent boarding school, which relocated from London in 1902. The school occupies a 485 hectare site and the whole of the school site is now Grade II\* listed.
- 1.5 In 2006, the village centre at Southwater was redeveloped to become the Lintot Square community hub. This includes a range of shops, a public house, a library and health centre and business premises.
- 1.6 The railway line through Southwater closed in 1966 and the trackbed is now a bridleway forming part of the Downs Link which crosses the Parish. This route is a popular area for riding, cycling and walking.
- 1.7 The most recent developments in Southwater have taken place on land to the west of Worthing Road and at Roman Lane. These sites have, in total, seen the development of over 800 new residential units together with significant new community infrastructure, particularly new sports and recreational facilities.

#### *The Independent Examiner*

- 1.8 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Plan by Horsham District Council (the District Council), with the agreement of the Parish Council.
- 1.9 I am a chartered town planner, with over 40 years of experience in planning. I have worked in both the public and private sectors and have experience of examining both local plans and neighbourhood plans. I have also served on a Government working group considering measures to improve the local plan system and undertaken peer reviews on behalf of the Planning Advisory Service. I therefore have the appropriate qualifications and experience to carry out this independent examination.
- 1.10 I am independent of the qualifying body and the local authority and do not have an interest in any of the land that may be affected by the Plan.

## *The Scope of the Examination*

1.11 As the independent examiner, I am required to produce this report and recommend either:

- (a) that the neighbourhood plan is submitted to a referendum without changes; or
- (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
- (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

1.12 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:

- Whether the plan meets the Basic Conditions;
- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
  - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
  - it sets out policies in relation to the development and use of land;
  - it specifies the period during which it has effect;
  - it does not include provisions and policies for 'excluded development';
  - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
  - whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum; and
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').

1.13 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

## *The Basic Conditions*

1.14 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood 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 for the area;
- be compatible with and not breach European Union (EU) obligations; and
- meet prescribed conditions and comply with prescribed matters.

1.15 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>1</sup>

## **2. Approach to the Examination**

### *Planning Policy Context*

2.1 The Development Plan for this part of Horsham District Council, not including documents relating to excluded minerals and waste development, is the Horsham District Planning Framework (HDPF) adopted in November 2015. The Plan period of the HDPF runs until 2031, which is the end date of the draft Neighbourhood Plan. Horsham District Council are currently preparing a new Local Plan for the district to cover the period from 2019 to 2036, which in due course will supersede the HDPF. However, that emerging Local Plan has only recently reached its Regulation 18 public consultation stage

2.2 The Basic Conditions Statement (at pages 7-11) provides a full assessment of how each of the policies proposed in the draft Plan are in general conformity with the relevant strategic policies in the adopted HDPF. Having been adopted in November 2015, the HDPF provides a reasonably up to date strategic planning context for the Neighbourhood Plan covering the period up to 2031.

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<sup>1</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

- 2.3 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 19 February 2019 (and updated on 19 June 2019). All references in this report are to the 2019 NPPF and its accompanying PPG.<sup>2</sup>

#### *Submitted Documents*

- 2.4 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Southwater Neighbourhood Plan 2019-2031 (Submission Version) (March 2019);
  - the Neighbourhood Designation Map (16 May 2016)(as amended), which identifies the area to which the proposed Neighbourhood Development Plan relates;
  - the Consultation Statement (March 2019);
  - the Basic Conditions Statement (March 2019);
  - the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Report, including a Non-Technical Summary (March 2019);
  - the Habitat Regulations Assessment Screening Report (November 2018) prepared by the District Council;
  - all the representations that have been made in accordance with the Regulation 16 consultation; and
  - the further written submissions made prior and subsequent to the hearing session (held 28 February 2020).<sup>3</sup>
- 2.5 I have also considered the following evidence documents which were submitted to the District Council alongside the above-listed documents:
- Assets of Community Value (February 2019);
  - Retail Needs of Southwater (March 2019);
  - Desktop Biodiversity Report (November 2016), prepared by Sussex Biodiversity Record Centre;
  - Educational Need for Secondary Places – Southwater (February 2019), prepared by Enplan;
  - Review of Heritage Assets (March 2019);
  - Built-up Area Review (February 2019);
  - Southwater Housing Needs Assessment (November 2017), prepared by AECOM;
  - Proposed Housing Allocation West of Southwater (March 2019);
  - Avoiding Rubbish Design (NHBC Foundation) (February 2015);
  - Southwater Landscape Sensitivity & Capacity Study (June 2018) prepared by Enplan;

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<sup>2</sup> See Paragraph 214 of the NPPF. The Plan was submitted under Regulation 15 to the local planning authority after 24 January 2019.

<sup>3</sup> View at: <https://www.horsham.gov.uk/planning/neighbourhood-planning/southwater>

- Southwater Parish Design Statement Supplementary Planning Document (April 2011);
- Southwater Neighbourhood Plan – Whole Plan Viability Assessment (March 2019), prepared by Three Dragons;
- Review of Public Open Spaces in Southwater (March 2019); and
- Site Assessments (February 2019).<sup>4</sup>

### *Site Visit*

2.6 I made an unaccompanied site visit to the Neighbourhood Plan Area on 10 January 2020 to familiarise myself with it and visit relevant sites and areas referenced in the Plan, evidential documents and representations.

### *Written Representations with or without Public Hearing*

2.7 Following my appointment as the independent examiner and initial consideration of the Plan, its supporting documents and representations made at the Regulation 16 consultation stage, I wrote to the District Council and the Parish Council on 13 December 2019 stating that, in addition to considering the written representations that were made to the draft Plan, I considered that a Public Hearing was necessary to ensure adequate examination of a number of issues that had arisen, and to receive oral submissions on those matters. Accordingly, with the kind assistance of the Parish and District Council, a Public Hearing was organised and held on 28 February 2020 at the Southwater Leisure Centre, Pevensey Road, Southwater. Invitations were extended to those parties who I wished to hear from at the Hearing, together with a formal Agenda for the Hearing, Guidance and Directions for the conduct of the discussions and a Supplementary Note to those parties participating in the Hearing. These documents are also available on the Parish Council and District Council websites.<sup>5</sup>

2.8 One of the parties invited to the Public Hearing, Thakeham Homes, was unable to attend on medical advice. I therefore made arrangements for Thakeham Homes to make their submissions in writing to me by 13 March 2020, with other invited parties then having the opportunity to make any further comments on those submissions by 27 March 2020. Those further submissions are also available on the Parish Council and District Council websites.

2.9 In combination, the discussions at the Public Hearing; the submissions that were then made to me; the further written submissions that were submitted to me after the close of the Hearing and the written representations submitted at the Regulation 16 consultation stage, have

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<sup>4</sup> View at:

[https://strategicplanning.horsham.gov.uk/consult.ti/SouthwaterNP\\_Reg16/consultationHome](https://strategicplanning.horsham.gov.uk/consult.ti/SouthwaterNP_Reg16/consultationHome)

<sup>5</sup> View at: <https://www.horsham.gov.uk/planning/neighbourhood-planning> and <https://southwater.joomla.com/>

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in all cases provided me with sufficient information to enable me to reach a conclusion on the matters concerned.

### *Modifications*

- 2.10 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications in full in the Appendix.

## **3. Procedural Compliance and Human Rights**

### *Qualifying Body and Neighbourhood Plan Area*

- 3.1 The Plan has been prepared and submitted for examination by Southwater Parish Council, which is the qualifying body. An application to the District Council for the Parish Council area to be designated a neighbourhood planning area was first made in October 2013 and was approved by the District Council on 25 February 2014, following public consultation. A second application was made on 20 March 2016 for the re-designation of the Neighbourhood Planning Area to reflect amendments made to the Parish boundary that had been brought into effect by Horsham District Council (Reorganisation of Community Order) 2013 in May 2015. This second application was approved by the District Council on 16 May 2016, again following public consultation, and it is this area that constitutes the designated Neighbourhood Planning Area for the purposes of this examination.
- 3.2 However, the Parish boundary was further amended on 5 February 2019 by an extension at the south of the Parish, to include an area of land south of Centenary Road. This additional land is not covered by the draft Plan as indicated on the map at paragraph 1.7 on page 3 of the Plan and so the Plan area no longer covers all of Southwater Parish.

### *Plan Period*

- 3.3 The draft Plan specifies (on the front cover and on page 3) the period to which it is to take effect, which is between 2019 and 2031. This aligns with the end date of the adopted HDPF.

### *Neighbourhood Plan Preparation and Consultation*

- 3.4 Work first commenced on the preparation of the Plan in March 2014 with a public meeting, and a Steering Group was formed to guide the preparation of the Plan. Further meetings and exhibitions took place during 2014 including meetings with neighbouring Parish Councils. A Parish survey and questionnaire were undertaken between January and April 2015, with delivery to every residential and commercial address in the Parish. The SA/SEA Scoping Report was prepared during 2015 and then subject to

consultation in early 2016. A 'call for sites' was undertaken in Spring 2015, with thirteen landowners and developers submitting sites and proposals in response. A further 'call for sites' was then undertaken in July 2017 with some additional sites put forward. During 2017 additional survey work was undertaken, together with the preparation of the Parish Housing Needs Assessment (HNA) by AECOM. Other key evidence base documents were prepared during 2018, together with the preparation of the draft Pre-Submission Plan.

- 3.5 The Regulation 14 consultation on the Pre-Submission Plan was held between 5 October and 16 November 2018, accompanied by extensive publicity throughout the Neighbourhood Plan Area by a variety of media and news outlets. Drop-in sessions were held on various dates during October and November 2018, together with an exhibition. Properties that were considered to be directly affected by the draft Plan were each, individually consulted by letter. The Consultation Statement and its 36 Appendices contain a comprehensive record of the various consultation activities that took place, together with a database of consultation responses and the comments and responses of the Steering Group.
- 3.6 The comments and responses received from residents and stakeholders during the Regulation 14 consultation were analysed between December 2018 and February 2019, and any necessary amendments were made to the draft Plan.
- 3.7 Further supporting documents were also prepared following the Regulation 14 consultation including a Site Assessments report (February 2019), the Basic Conditions Statement (March 2019) and the Consultation Statement (March 2019). A SA/SEA was prepared in March 2019 including a Non-Technical Summary, following the SA/SEA Scoping Report prepared in 2015. A Habitat Regulations Assessment Screening Report (HRA) was prepared by the District Council in November 2018, taking account of the High Court judgment of March 2017 in relation to nitrogen deposition on the Ashdown Forest SAC.<sup>6</sup>
- 3.8 The Regulation 15 Submission Plan was considered and approved by the Parish Council on 13 March 2019, and the Plan was submitted to the District Council on 14 March 2019.
- 3.9 The Plan was subject to further consultation from 7 June 2019 to 19 July 2019 under Regulation 16 and I take account of the 43 responses then received (which excludes one representation subsequently withdrawn) in writing this report, as well as the Consultation Statement.

### *Development and Use of Land*

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<sup>6</sup> [2017] EWHC 351 (Admin), [2017] Env LR 31. View at: <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>

3.10 The draft Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

#### *Excluded Development*

3.11 From my review of all the documents before me, the draft Plan does not include policies or proposals that relate to any of the categories of excluded development.<sup>7</sup>

#### *Human Rights*

3.12 The Basic Conditions Statement states (at page 12) that the Plan is considered to be compatible with EU obligations.<sup>8</sup> Neither the District Council nor any other party has raised any issues concerning a breach of, or incompatibility with Convention rights (within the meaning of the Human Rights Act 1998). From my assessment of the Plan, its accompanying supporting documents and the consultation responses made to the Plan at the Regulations 14 and 16 stages, I am satisfied that the Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. I consider that none of the objectives and policies in the Plan will have a negative impact on groups with protected characteristics. Many will have a positive impact.

## **4. Compliance with the Basic Conditions**

#### *EU Obligations*

4.1 A SA/SEA Scoping Report for the Plan was prepared in February 2016 which was the subject of consultation with statutory agencies and other key stakeholders. The Scoping Report confirmed that a SEA was required to be undertaken for the Plan. This was followed by the publication of a SA/SEA alongside the draft Plan at the Regulation 14 consultation stage (October 2018) and then by the final SA/SEA document at the Regulation 15 Submission stage (March 2019). The document includes the SEA and a full SA of the Plan and its policies and site proposals

4.2 I have assessed the SA/SEA methodology and process by which the Plan and its various policy alternatives and potential site allocations were tested against a series of 9 sustainability objectives for Southwater. I am satisfied that the Plan has been prepared to take account of the outcomes of the SA/SEA process. In particular, I am satisfied that the housing site allocation options, including submitted sites not included in the Submission Plan, were fully tested through the process on a consistent basis. The SA/SEA that has been submitted alongside the Plan identifies

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<sup>7</sup> The meaning of 'excluded development' is set out in s.61K of the 1990 Act.

<sup>8</sup> Note: EU Obligations are entirely separate to the European Convention on Human Rights, which is derived from the Council of Europe.

some significant cumulative positive impacts from the Plan's policies and proposals. Importantly, it states that the "total effect of the plan is considered to be overwhelmingly positive", that "cross-border effects will be minimal" and that "there would be, following the mitigation outlined, no synergistic effects that would give rise to significant negative effects". From my independent consideration, I accept those conclusions and am satisfied that the Plan has been subject to a rigorous and comprehensive SA/SEA process during its preparation.

- 4.3 A HRA Screening Report for the Plan was published in November 2018 and was the subject of consultation with the necessary statutory bodies, including Natural England, as required by legislation. There are three Natura 2000 sites otherwise known as European sites, the Arun Valley Special Protection Areas (SPA) and Ramsar site, the Arun Valley Special Area of Conservation (SAC) and The Mens Woodland SAC within 20 kilometres of Horsham district. Additionally, the Screening Report assessed the potential impacts upon the Ashdown Forest SAC, which is some 39 kilometres from the district. The Screening Report concludes that an Appropriate Assessment is not required for the Plan, but that appropriate references be made in the Plan to the relevant HDPF policies to further strengthen the mitigation for the Arun Valley SPA and the Mens Woodland SAC and also whether any future development proposals may impact, either individually or in combination, upon any SPA or SAC, including the Ashdown Forest, such that a HRA including an Appropriate Assessment is required.
- 4.4 I have also noted that Natural England, Historic England and the Environment Agency have not raised any concerns regarding the SA/SEA and HRA. Therefore, on the basis of the information provided and my independent consideration of the SA/SEA, the HRA and the Plan, I am satisfied that the Plan is compatible with EU obligations in respect of the SEA Regulations and the Habitats Directive.

#### *Main Assessment*

- 4.5 The NPPF states (at paragraph 29) that "*Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan*" and also that "*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*".
- 4.6 The NPPF (at paragraph 11) also sets out the presumption in favour of sustainable development. It goes on to state (at paragraph 13) that neighbourhood plans should support the delivery of strategic policies contained in local plans; and should shape and direct development that is outside of these strategic policies.

- 4.7 Having considered above whether the Plan complies with various legal and procedural requirements, it is now necessary to deal with the question of whether it complies with the remaining Basic Conditions (see paragraph 1.14 of this report), particularly the regard it pays to national policy and guidance, the contribution it makes to sustainable development and whether it is in general conformity with strategic development plan policies.
- 4.8 I test the Plan against the Basic Conditions by considering specific issues of compliance of the Plan's 23 policies, which address the following policy themes: Southwater in 2031; Land Allocation and Ensuring Adequate Infrastructure; Securing Our Open Spaces; Residential Development; Getting About; The Built and Natural Environment; The Parish Economy and the Community Infrastructure Levy. As part of that assessment, I consider whether the policies in the Plan are sufficiently clear and unambiguous, having regard to advice in the PPG. A policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.<sup>9</sup> I recommend some modifications as a result.
- 4.9 The Plan is addressing a Plan period from 2019 to 2031 and seeks to provide a clear framework to guide residents, local authorities and developers as to how the community wish to shape future development during that period. Sections 3-10 of the Plan contain specific policies in respect of each of the themes listed above.
- 4.10 The legal and planning policy context for the Plan is set out within Section 1. This section of the Plan also addresses the relevant strategic planning policies in the adopted HDPF and the requirement for the Plan to have regard to national policies and advice contained in the NPPF and national guidance. I also note that the Basic Conditions Statement (at Section 3) describes how the Plan contributes to the achievement of sustainable development and (at Section 4) how it is in general conformity with the strategic policies in the development plan for the area.
- 4.11 I consider that overall, subject to the detailed modifications I recommend to specific policies below, that individually and collectively the Plan's policies will contribute to the achievement of sustainable patterns of development. However, there are a number of detailed matters which require amendment to ensure that the policies have the necessary regard to national policy and are in general conformity with the strategic policies of the District Council.

### *Specific Issues of Compliance*

- 4.12 There were five issues which were raised in representations to the draft Plan and which, in my assessment, necessitated a Public Hearing as part

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<sup>9</sup> PPG Reference ID: 41-041-20140306.

of this examination. Those issues were general conformity with HDPF Strategic Policies, 2, 3, 4 and 15; Policy SNP1 (b) (Built-Up Area Boundaries); Policy SNP2 (Allocation for Residential Development); other residential development sites proposed in Regulation 16 representations; and Policy SNP5 (Local Green Space). I have taken account of the submissions, both oral and written, that were made prior to, during and after the Public Hearing in my assessment of the relevant policies set out in paragraphs 4.13 - 4.66 below.

### *Southwater in 2031*

- 4.13 Section 3 of the draft Plan sets out the core principles which should guide development over the Plan period up to 2031. These are contained within Policy SNP1 (Core Principles). I have assessed this policy in the context of the strategic planning policies for the Plan area and consider that it is in general conformity with those policies.
- 4.14 The policy includes the definition of Built-Up Area Boundaries (BUAB) for the two settlements of Southwater and Christ's Hospital, which are shown on the Policies Map. The existing defined BUABs are contained in the adopted HDPF in accordance with Policy 3 and the draft Plan seeks to review those boundaries. The definition of the revised boundaries is supported by the evidence document entitled Built-Up Area Review (February 2019). In their comments on the draft Plan, the District Council consider that the review of such boundaries is a strategic matter and should be undertaken on a district-wide basis through the emerging Local Plan.
- 4.15 I have given very careful consideration to the work that was undertaken to review the BUABs and to the methodology that was used, which I note was very largely based upon the methodology used by the District Council. I have also considered the various representations that have been made concerning detailed aspects of the proposed BUABs at both Southwater and Christ's Hospital, together with the submissions made at the Public Hearing including those made by the District Council. In my assessment, the proposed BUABs are justified and that it is a legitimate function of the draft Plan to undertake a review of existing boundaries (as previously defined by the District Council) and to propose revised BUABs following such a review. If, in due course, the District Council propose further revisions to those boundaries through the emerging Local Plan as part of a strategic district-wide review, then the Neighbourhood Plan can be reviewed to take account of any necessary revisions (see also paragraph 4.66 below and recommended modification **PM17**). However, I do consider that the policy should provide a reference to the Policies Map for the benefit of users of the Plan, and I therefore recommend modification **PM1** to make this amendment.
- 4.16 I note that clause SNP1.2 of Policy SNP1 contains a policy reference to the need to undertake a HRA including an Appropriate Assessment when required, as recommended in the HRA Screening Report. However, I also

note that the second recommendation in that report to make reference to the relevant HDPF policies has not been implemented. I consider that clause SNP1.2 should contain a reference to HDPF Policy 25 (The Natural Environment and Landscape Character), and that this policy should also be listed in Section 1 of the Plan alongside the other HDPF policies listed therein. Recommended modification **PM1** therefore also includes these amendments, together with the correction of a minor typographical error.

- 4.17 With recommended modification PM1, I consider that the draft Plan's policy on its core principles is in general conformity with the strategic policies of the HDPF, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

#### *Land Allocation and Ensuring Adequate Infrastructure*

- 4.18 Section 4 of the draft Plan addresses the strategic growth requirement for new development in the Plan area, as set out within HDPF Policies 2, 3, 4 and 15 which are referenced at paragraphs 1.15-1.18 in the Plan. This section contains three policies (SNP2-SNP4) addressing the allocation of land west of Southwater for residential development and supporting infrastructure, the safeguarding of land for a new Secondary School and highways infrastructure improvements.
- 4.19 Policy SNP2 (Allocation for Residential Development) proposes the development of land west of Southwater for 422-450 new residential dwellings, a minimum of 8 hectares of public open space and supporting infrastructure.
- 4.20 This proposed allocation is supported by a number of evidence documents comprising the Southwater HNA prepared by AECOM (November 2017), the Site Assessments report (February 2019), and the Proposed Housing Allocation West of Southwater report and supporting documentation (March 2019). I have considered each of these documents in detail, and I note that the HNA concludes at paragraph 258 that "...taking into consideration market signals evidence that indicates an increase in dwelling numbers to meet future need is appropriate, this HNA recommends a housing target falling in the range of 420 and 460 dwellings to be delivered over the Plan Period".
- 4.21 I have also given careful consideration to the SA/SEA report which contains the assessments of the various reasonable alternative options that were tested for the delivery of sustainable growth in the Parish. Six options were tested, with the proposed allocation of land west of Southwater that is now contained within the draft Plan being tested as Option 5 (Alternative Western Expansion of Southwater). I have taken account of the commentary regarding Option 5 at paragraphs 7.63-7.70 in the SA/SEA report, and the summary at paragraph 7.82 which states that "...Option 5 is a reasonable alternative which can be taken forward with the Neighbourhood Plan".

- 4.22 Policy SNP2 is a comprehensive policy which sets out a requirement for the provision of 422-450 new dwellings, comprising a minimum of 350 units falling in Use Class C3 and a minimum of 72 units falling in Use Class C2, together with a minimum of 8 hectares of public open space. Clause SNP2.2 contains eleven criteria that must be met for development proposals to be considered acceptable. The range of 422-450 new dwellings is clearly closely aligned to the recommendation of the HNA set out above.
- 4.23 I have considered all of the representations that have been made concerning the policy together with the discussions and submissions during the Public Hearing and I have reached the following conclusions. Firstly, I consider that the key principles of the policy are fully justified by the supporting evidence and that the proposed allocation is in general conformity with the strategic policies in the Development Plan. It will assist in significantly boosting housing supply in both the Plan area and the district as a whole. However, I consider that a number of amendments are required to the policy criteria listed within clause SNP2.2 in order to improve the effectiveness of the policy and to provide a clearer basis for the preparation of a masterplan and a planning application for its future development. These also include revisions to the title of Section 4, a revision to the relevant sub-heading and a revision to the title of Policy SNP2. I address these amendments as part of my recommended modification (see **PM2** below), but for clarity the additional parcel of land that is identified in recommended new paragraph 4.17 in the supporting text to the policy is that shown hatched blue on the plan submitted by Berkeley Strategic Land Ltd. (Rep. No. 38) as part of their representations on the Policies Map.
- 4.24 Secondly, and notwithstanding my conclusion that the key principles of the policy are fully justified, I have also given careful consideration to the various other potential housing development sites in the Plan area that have been put forward by landowners and developers as part of the Regulation 16 representations on the draft Plan, and which were each discussed at the Public Hearing. These concern land at Stoneleigh and Griggs at Tower Hill, three separate sites to the west of Worthing Road and land at The Copse, Worthing Road. I note that each of these sites has been considered within the Site Assessments report (February 2019) as part of the Plan preparation process.
- 4.25 I do not recommend the inclusion of any of these sites within the draft Plan for future residential development. However, I do consider that the draft Plan should provide greater flexibility in policy terms to address any residential development proposals that may come forward during the Plan period on sites within the revised BUABs which are available, suitable and achievable and which satisfy the policies of the Development Plan, including the Neighbourhood Plan. In this context, any additional residential development in the Plan area that complies with the policies in the draft Plan will represent a further boost to housing supply and delivery



in line with national and district policy. Accordingly, I recommend modification **PM2** to address this matter, together with the other amendments to Policy SNP2 that are referred to above.

- 4.26 Policy SNP3 (Safeguarding of Land for New Secondary School) safeguards land to the west of Worthing Road, Southwater for a proposed new Secondary School or an all-through school that is likely to be required from 2025 onwards. The land is shown on the Policies Map, and I am satisfied that there is a clear justification to safeguard the site to meet future educational requirements in the Plan area and beyond.
- 4.27 Policy SNP4 (Keeping Our Roads Moving) addresses the need to secure the necessary highways and transportation improvements in connection with major development proposals in the Plan area. The policy seeks to ensure that any such improvements are approved as part of development proposals and subject to relevant conditions and/or a Section 106 Agreement linked to planning permissions granted. I consider that this is a normal requirement in the assessment and approval of major development proposals in liaison with the Highways Authority, which in this case is West Sussex County Council.
- 4.28 With the recommended modification PM2, I consider that the draft Plan's policies for new residential development and securing infrastructure in the Plan area are in general conformity with the strategic policies of the HDPF, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions

#### *Securing Our Open Spaces*

- 4.29 Section 5 of the draft Plan addresses the open spaces within the Plan area and contains four policies (SNP5-SNP8) concerning Local Green Spaces, Local Community Spaces, Formal/Informal Sports Areas and the Southwater Country Park. The principal evidence document supporting these policies is a report entitled 'Review of Public Open Spaces in Southwater' (March 2019) which identifies and assesses the open spaces which the Steering Group consider should be protected from inappropriate development. I have paid careful regard to this document and have undertaken site visits to each of the sites proposed for designation in the specific policies. Additionally, I have taken account of the discussions and submissions during the Public Hearing in respect of Policy SNP5 (Local Green Space).
- 4.30 Policy SNP5 (Local Green Space) proposes the designation of 13 areas as Local Green Spaces, which are identified on the Policies Map. There is clear guidance within the NPPF (at paragraph 100) regarding the designation of Local Green Spaces. It states that:

*"The Local Green Space designation should only be used where the green space is:*

- a) in reasonably close proximity to the community it serves;*

- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land.”*

- 4.31 I have assessed each of the proposed Local Green Spaces in light of these criteria and the further advice in the PPG.<sup>10</sup> I have also taken account of the various representations that have been made regarding the policy. I am satisfied that a rigorous assessment has been undertaken of each proposed Local Green Space in accordance with the NPPF criteria, and that in each case the proposed designation is justified. I further note that the relevant landowners were contacted at the Regulation 14 consultation stage and given the opportunity to comment.
- 4.32 A minor correction is necessary to paragraph 5.3 of the supporting text, which is addressed by recommended modification **PM3**.
- 4.33 Policy SNP6 (Local Community Space) proposes the designation of 17 areas as Local Community Spaces. These comprise a range of open spaces, green spaces, play areas and amenity spaces. These are identified on the Policies Map and have again been subject to a rigorous assessment as part of the wider assessment of public open spaces. Landowners were contacted at the Regulation 14 consultation stage and given the opportunity to comment.
- 4.34 I consider that in each case the proposed designation is justified and that the methodology for their assessment has been consistent and robust.
- 4.35 Policy SNP7 (Formal/Informal Sports Areas) proposes the designation of 8 areas as Formal/Informal Sports Areas. These comprise open spaces that are used, both formally and informally, for sporting activities. These areas are identified on the Policies Map and have again been subject to a rigorous assessment. They include two areas being provided as part of the ongoing Broadacres residential development. I have considered many representations concerning the apparent intentions of the owners of the golf course at the Denne Park Recreational Area (Site Ref. SNP7.1 a)) to reduce the size of the golf course from 18 holes to 9 holes and to promote the development of ca. 500 new dwellings at that site. As noted at paragraph 4.25 above, I do not recommend the addition of any further housing allocation sites in the Plan. That apart, I consider that the designation of the Denne Park Recreational Area as a Formal/Informal Sports Area as part of Policy SNP7 is justified in view of the range of recreational facilities available at the site, including the golf course, a driving range together with the proposed football ground, and its existing intensive use by the local community.

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<sup>10</sup> See PPG Reference ID: 37-005-20140306 to ID: 37-022-20140306.

- 4.36 I consider that in each case the proposed designation is justified and that the methodology for their assessment has been consistent and robust.
- 4.37 Policy SNP8 (Southwater Country Park) is specifically concerned with the Country Park which is located on the site of the former Southwater Brickworks. It is a popular and well used facility and is a significant recreational asset for the Parish. The site contains three lakes, with a number of other facilities. The policy is drafted to provide support to the development of appropriate facilities at the site. I am satisfied that the policy, as drafted, does identify the necessary criteria to provide support for appropriate forms of development at the site, and accordingly I make no recommendations to modify this policy.
- 4.38 With the recommended modification PM3, I consider that the draft Plan's policies for open spaces in the Plan area are in general conformity with the strategic policies of the HDPF, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

#### *Residential Development*

- 4.39 Section 6 of the draft Plan addresses the size, type and design standards for new residential development in the Plan area and contains four policies (SNP9-SNP12) concerning Home Standards, Residential Space Standards, Specialist Accommodation and Care and Outdoor Play Space. It is supported principally by the Southwater HNA.
- 4.40 Policy SNP9 (Home Standards) seeks to ensure that all new homes are designed and built to a standard so that they are suitable for people of all ages. Clause SNP9.1 states that new dwellings must achieve the standards contained in Part M4(2) of the Building Regulations. However, at the present time, this remains as an optional building standard. Clause SNP9.2 concerns residential extensions and states that, so far as reasonably possible, the new part of a dwelling should conform to Part M4(2) building standards. Clause SNP9.3 states that these requirements will be secured by condition as part of planning permissions granted.
- 4.41 In my assessment, the policy sets a requirement for residential building standards that presently exceed the compulsory national requirements. Whilst this may well change during the lifetime of the Plan, the policy must conform to national requirements in so far as Part M4(2) is only an optional requirement. I therefore recommend modification **PM4** to address this point, with amendments to the text of clauses SNP9.1 and SNP9.3
- 4.42 Policy SNP10 is concerned with residential space standards and requires all new residential units to meet the nationally prescribed space standard

published by the Government.<sup>11</sup> I consider that the text of clause SNP9.1 of the policy as drafted does require some amendment to give improved clarity for users of the Plan, and I recommend modification **PM5** accordingly.

- 4.43 Policy SNP11 addresses the identified need for additional specialist residential accommodation for older people in the Plan area and provides support for proposals for Use Class C2 accommodation within the BUABs. I am satisfied that the policy meets both national and local policy objectives. However, the clarity of the policy, as drafted, could be improved, and I recommend modification **PM6** to make a number of minor amendments to the text of the policy and to correct a typographical error at paragraph 6.14 of the supporting text.
- 4.44 Policy SNP12 is concerned with the provision of suitable outdoor play space as part of major residential development proposals in the Plan area. I consider that the text of the policy, as drafted, does require some amendment to achieve clarity and I recommend modification **PM8** in order to address this point.
- 4.45 Finally, I also consider that the title of Section 6 should be amended to “Residential Development Standards and Requirements”, to make it clear for users of the Plan that this section of the Plan is addressing the more detailed planning requirements for new residential development. I therefore recommend modification **PM7** to address that point.
- 4.46 With the recommended modifications PM4-PM8, I consider that the draft Plan’s policies for residential development in the Plan area are in general conformity with the strategic policies of the HDPF, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### *Getting About*

- 4.47 Section 7 of the draft Plan addresses issues relating to accessibility, movement and car parking within the Plan area and contains three policies (SNP13-SNP15) concerning Enhancing Our Non-Motorised Transport Network, Adequate Provision of Car Parking and Driving in the 21<sup>st</sup> Century.
- 4.48 Policy SNP13 seeks to promote new and improved routes in the Plan area for non-motorised users, such as cyclists, wheelchair users, and horse riders. In this context, the policy is addressing the provision and improvement of safe and accessible Rights of Way, footpaths, cycleways and bridleways. The policy also refers to various Promoted Routes,

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<sup>11</sup> View at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/524531/160519\\_Nationally\\_Described\\_Space\\_Standard\\_Final\\_Web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf)

identified on the Policies Map, which are footpaths that show important aspects of life and heritage in the Parish. I am satisfied that the policy reflects these objectives.

- 4.49 Policy SNP14 seeks to ensure that adequate off-road car parking provision is made for new residential development in the Plan area. I have given careful consideration to this policy, its purpose and its content. As drafted, the policy is lengthy and complex. It does not have regard to national guidance that neighbourhood plan policies should be concise, precise and drafted with sufficient clarity for the benefit of users of the Plan and decision makers. The policy, as drafted, also contains a significant amount of guidance, rather than specific policy material, which in my assessment should be placed within the supporting text for the policy, rather than in the policy itself. I therefore recommend modification **PM9** to make a series of amendments to the policy to reduce its length, improve its clarity and better reflect national guidance.
- 4.50 Policy SNP15 seeks to promote the introduction of charging points to support the use of electric vehicles as part of new development proposals. In my assessment, this policy, as drafted, also contains some material which is guidance rather than specific policy requirements. Again, I consider that such material should be placed within the supporting text for the policy, rather than in the policy itself. I recommend modification **PM10** to address that issue, and also to correct some typographical errors in the supporting text for the policy.
- 4.51 With the recommended modifications PM9 and PM10, I consider that the draft Plan's policies for accessibility and movement in the Plan area are in general conformity with the strategic policies of the HDPF, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

#### *The Built and Natural Environment*

- 4.52 Section 8 of the draft Plan addresses the built and natural environment within the Plan area and contains five policies (SNP16-SNP20) concerning Design, Site Levels, A Treed Landscape, Parish Heritage Assets and the Retention of Assets of Community Value. These policies are supported by a number of evidence documents and also the Southwater Parish Design Statement (2011), which has previously been adopted as a Supplementary Planning Document (SPD) by the District Council.
- 4.53 Policy SNP16 promotes good design for all new development in the Plan area and contains nine design criteria which should be met as part of development proposals. I am satisfied that the policy is supported by appropriate evidence to justify its requirements and that it reflects the established principles of good planning, particularly in respect of new residential development. I recommend modification **PM11** in order to correct a minor typographical error.

- 4.54 Policy SNP17 addresses site levels and seeks to ensure that new developments take account of the existing topography of the site and the wider area in order to create a good sense of place. This is a detailed policy, and I have given careful consideration to whether its requirements are, in all cases, justified. In this respect, I do not consider that clause SNP17.5 can be fully justified as many Construction Management Plans require the retention and re-use of spoil on-site, particularly to create enhanced landscaping features, in order to avoid unnecessary lorry movements. I therefore recommend modification **PM12** to amend the wording of this clause to meet the Basic Conditions and to correct a minor typographical error.
- 4.55 Policy SNP18 promotes enhancements to the treed environment to secure biodiversity net gain and to protect and enhance Ancient Woodland in the Plan area. The policy is consistent with national policy, particularly in respect of achieving biodiversity net gain as part of new development proposals. The areas of Ancient Woodland are shown on the Policies Map and I consider that the policy should make reference to the Policies Map for the benefit of users of the Plan. I therefore recommend modification **PM13** accordingly.
- 4.56 Policy SNP19 is entitled Parish Heritage Assets. In terms of national policy guidance, the policy identifies 22 heritage assets in the Parish as proposed Non-designated Heritage Assets. The policy is supported by the evidence document entitled Review of Heritage Assets (March 2019) and I have given careful consideration to the individual assessments that have been undertaken for each of the buildings and structures now included within the policy and also for those not included. I am satisfied that a consistent approach has been undertaken to identify those buildings and structures that are most appropriate for inclusion in the policy, following a methodology based on advice from Historic England. I note that, although some of the structures are of recent construction, such as the Village Signs (2008) and Iggy the Dinosaur (2006), there is a strong historical connection between those structures and the history of the Parish. I have viewed each of the buildings and structures during my site visit and I do not recommend any deletions from the listing in the policy. However, I do consider that some minor amendments are necessary to the text of the policy to make it clear that the policy is addressing Non-designated Heritage Assets in order to reflect national guidance. I therefore recommend modification **PM14** accordingly.
- 4.57 Policy SNP20 addresses the Assets of Community Value in the Parish. The policy is consistent with national policy and guidance and I am satisfied that it is fully justified. However, I do recommend modification **PM15** to ensure correct terminology within the text of the policy and its supporting justification, and also to correct a minor typographical error.
- 4.58 With the recommended modifications PM11-PM15, I consider that the draft Plan's policies for the built and natural environment in the Plan area are in general conformity with the strategic policies of the HDPF, have

regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions

### *The Parish Economy*

- 4.59 Section 9 of the draft Plan addresses the Parish economy and contains two policies (SNP21 and SNP22) concerning A Growing Economy and Telecommunications. There are two main employment areas in the Parish at the Oakhurst Business Park and the Southwater Business Park. The Oakhurst Business Park is a defined Key Employment Area (Policy 9) within the adopted HDPF and is not considered further within the draft Plan. The Southwater Business Park, closer to the centre of the village, is proposed for designation as a Parish Employment Area in the draft Plan. The Plan supports growth and development of both business parks, subject to there being no unacceptable impacts upon local residents.
- 4.60 Policy SNP21 seeks to support and promote a growing economy within the Plan area. It contains criteria to safeguard existing employment floorspace and to support the growth of small businesses, including at locations outside the Key Employment Area and the proposed Parish Employment Area, where they are in accordance with the Development Plan. A further criterion provides support for working from home and for start-up businesses, subject to there being no unacceptable impact upon residential amenities. I consider that the policy has regard to national policy and guidance and is in general conformity with the strategic policies of the adopted HDPF.
- 4.61 Policy SNP22 addresses the requirement to support and enhance telecommunications networks over the Plan period, recognising that new technologies will bring positive benefits for the local economy and for residents. The policy contains two criteria, firstly to support the provision of telecommunications infrastructure subject to there being no unacceptable impact upon residential amenities, and secondly to require the provision of a broadband fibre connection to new and refurbished buildings. This is now a basic requirement for new developments as part of the utility infrastructure to be provided to new residential and commercial properties. I consider that the policy is justified, but that a minor amendment is necessary to the policy text to indicate that proposals will be supported rather than approved. I therefore recommend modification **PM16** to address this point.
- 4.62 With the recommended modification PM16, I consider that the draft Plan's policies for the local economy in the Plan area are in general conformity with the strategic policies of the HDPF, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### *Community Infrastructure Levy*

- 4.63 Section 10 of the draft Plan relates to the Community Infrastructure Levy (CIL) and contains one policy (SNP23) concerning the proposed future use of CIL funds that may be paid to the Parish Council, arising from new development in the Plan area.
- 4.64 Policy SNP23 indicates that any CIL funds will be used to support the delivery of projects contained in the 'Southwater Infrastructure Delivery Plan' which is produced and maintained by the Parish Council and for any other projects that may be identified as a priority by the Parish Council. I consider that the policy is consistent with the intended use of CIL funds and specifically for that proportion of those funds which is passed to Parish and Town Councils to be spent on local priorities.

#### *Neighbourhood Plan Policies Map*

- 4.65 Section 11 of the draft Plan contains the Policies Map, which for ease of reference, at an appropriate scale, is divided into three parts (North, Central and South). Each of those parts contains two inset maps. The Policies Map is well produced and provides a clear indication of the Plan's policy notations and proposals. As an advisory comment, to further improve the interpretation of the Policies Map for users of the Plan, the six insets would benefit from being numbered 1-6 with an appropriate reference on the Key Map on Page 38.

#### *Other Matters*

- 4.66 There is the likelihood that there will be a need to formally review the Plan during the Plan period, particularly following the prospective adoption of the emerging Horsham District Local Plan 2019-2036, which is presently timetabled to occur in December 2021. Although it is acknowledged (at paragraph 1.12) that there may be a need to review the Plan, I do not consider that this provides sufficient certainty regarding a future review. I have also taken into account a number of submissions that were made at the Public Hearing concerning this matter. I therefore recommend modification **PM17** to amend the wording of paragraph 1.12 to address this point.

#### *Concluding Remarks*

- 4.67 I consider that, with the recommended modifications to the Plan as summarised above and set out in full in the accompanying Appendix, the Southwater Neighbourhood Plan (2019-2031) meets the Basic Conditions for neighbourhood plans. As a further advisory comment, when the Plan is being redrafted to take account of the recommended modifications, it should be re-checked for any typographical errors and any other consequential changes, etc.

## **5. Conclusions**

### *Summary*



- 5.1 The Southwater Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the Plan, and the supporting documents submitted with it, together with the submissions that were made at the Public Hearing and also those made thereafter.
- 5.2 I have made recommendations to modify certain policies and other matters to ensure that the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

### *The Referendum and its Area*

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Southwater Neighbourhood Plan, as modified, has no policies or proposals which I consider significant enough to have an impact beyond the Parish Council boundary. However, as noted at paragraph 3.2 above, the Parish boundary was extended on 5 February 2019 subsequent to the formal re-designation of the Neighbourhood Plan area in May 2016. I therefore recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the Parish Council as extended in 2019, notwithstanding the formally designated area is slightly smaller in its extent.

### *Overview*

- 5.4 It is clear that the Southwater Neighbourhood Plan is the product of much hard work undertaken since 2014 by the Parish Council, the Neighbourhood Planning Steering Group and by the many individuals and stakeholders who have contributed to the preparation and development of the Plan. In my assessment, the Plan reflects the land use aspirations and objectives of the Southwater community for the future development of their community up to 2031. The output is a Plan which should help guide the area's development over that period, making a positive contribution to informing decision-making on planning applications by Horsham District Council.

*Derek Stebbing*

Examiner

## Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Pages 5 and 11	<p>Policy SNP1 – Core Principles</p> <p>Clause SNP1.1 – 3rd line: amend “Below” to <b>“below”</b>.</p> <p>Clause SNP1.1 b) – Amend wording to read:  <b>“Settlements within the Plan area will only grow beyond their Built-Up Area Boundaries (as defined by this Neighbourhood Plan and shown on the Policies Map) in accordance with policies contained in the Development Plan.”</b></p> <p>Clause SNP1.2 – Add new second sentence to this clause, as follows:  <b>“All development proposals should take account of HDPF Policy 25 (The Natural Environment and Landscape Character), as referenced at paragraph 1.19.”</b></p> <p>Add new Paragraph 1.19 at Page 5 to read as follows:  <b>“1.19 HDPF Policy 25 Strategic Policy: The Natural Environment and Landscape Character</b>  <b>This policy seeks to protect the natural environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats, against inappropriate development.”</b></p> <p>Re-number paragraphs 1.19-1.21 as 1.20-1.22.</p>
PM2	Page 13	<p><u>Policy SNP2 – Allocation for Residential Development</u></p> <p>Amend title of Section 4 of the Plan (on Page 12) to read: <b>“New Residential Development &amp; Ensuring Adequate</b></p>

		<p><b>Infrastructure</b>” (and amend Contents Page 1 accordingly).</p> <p>Amend sub-heading on Page 13 to read: <b>“Residential Development Proposals”</b> (and amend Contents Page 1 accordingly).</p> <p>Amend title of policy to read: <b>“Proposals for Residential Development”</b> (and amend Contents Page 2 accordingly).</p> <p>Add new clause SNP2.1 (and re-number existing clauses SNP2.1 and SNP2.2 as SNP2.2 and SNP2.3 respectively).</p> <p>New clause SNP2.1 to read as follows:</p> <p><b>“SNP2.1 Proposals for new residential development on sites within the Built-Up Area Boundaries will be considered in the context of all relevant policies in this Plan, and how they contribute to the achievement of sustainable development. Proposals which comply in full with these policies will be supported.”</b></p> <p>Clause SNP2.1 – Add new 3<sup>rd</sup> sentence to read:</p> <p><b>“The site shall be planned such that any further longer-term development proposals that may come forward through the emerging Horsham Local Plan and/or a review of this Plan are not prejudiced”.</b></p> <p>Clause SNP2.2</p> <p>Delete the word “must” in the 1<sup>st</sup> line and replace with <b>“should”</b>.</p> <p>Amend the following criteria:</p> <p>a) 6<sup>th</sup> line: amend the word “perpendicular” to <b>“perpendicular”</b>.</p> <p>e) Delete existing text and replace with: <b>“Buildings should reduce in height and density the further they are away from the village centre/Lintot Square and should respect the local character</b></p>
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		<p><b>of Southwater through sensitive and high quality design.”</b></p> <p>g) Delete existing text and replace with:  <b>“The mix of C3 homes should be in accordance with the latest evidence on the required housing mix (currently the Crawley and Horsham Market Housing Mix Report, November 2016 and HDC Planning Obligations and Affordable Housing Supplementary Planning Document, 2017 or any later documents that supersede them.”</b></p> <p>Add new paragraph 4.17 to the supporting text for this policy to read as follows:</p> <p><b>“South of the housing site allocation contained in SNP2 is a parcel of land within the Built-Up Area Boundary which forms part of the strategic allocation SD10 in the adopted Horsham District Planning Framework as shown on the Policies Map. The principle of development has been established by this strategic allocation, and this Plan does not alter that policy position”.</b></p> <p>Re-number Paragraphs 4.17-4.25 as Paragraphs 4.18-4.26 respectively.</p> <p>Amend the Policies Map (Central and South Insets) to clearly notate that the parcel of land referred to in new paragraph 4.17 is covered by HDPF Strategic Allocation SD10. (For clarity, see also the land shown hatched blue on the plan submitted by Berkeley Strategic Land Ltd. (Rep. No. 38) as part of their representations on the Policies Map).</p>
PM3	Page 17	<p>Paragraph 5.3</p> <p>3rd line – amend “paragraph 77” to read <b>“paragraph 100”.</b></p>
PM4	Page 22	<p><u>Policy SNP9 – Home Standards</u></p> <p>Clause SNP9.1- delete the word “must” and replace with <b>“should”.</b></p>

		<p>Clause SNP9.3 – delete the existing wording and replace with:</p> <p><b>“This requirement will be secured, where appropriate, by a condition attached to planning permissions granted.”</b></p>
PM5	Page 22	<p><u>Policy SNP10 – Residential Space Standards</u></p> <p>Clause SNP10.1 – amend the text to read as follows:</p> <p><b>“All new residential units must meet the <i>‘Technical housing standards – nationally described space standard’ (March 2015, as amended in May 2016)</i> or subsequent updated standard published by the Government.”</b></p>
PM6	Page 23	<p><u>Policy SNP11 – Specialist Accommodation &amp; Care</u></p> <p>Clause SNP11.1 - delete existing text, and replace with:</p> <p><b>“Proposals for new development within the Built-Up Area Boundaries falling within Use Class C2 will be supported and encouraged. Such developments should be located close to complementary facilities and services (e.g. health centre, shops and public transport) and which should be fully accessible for residents and staff.”</b></p> <p>Clause SNP11.2 – delete existing text, and replace with:</p> <p><b>“To ensure that new developments falling within Use Class C2 remain in such use, the Local Planning Authority will secure their retention with appropriate conditions and/or a Section 106 Agreement as part of any planning permissions granted.”</b></p> <p>Paragraph 6.14 – 3rd line: amend “Boundary’s” to <b>“Boundaries”</b>.</p>
PM7	Page 21	<p>Amend title of Section 6 of the Plan (on Page 21) to read: <b>“Residential Development</b></p>

		<b>Standards and Requirements”</b> (and amend Contents Page 1 accordingly).
PM8	Page 24	<p><u>Policy SNP12 – Outdoor Play Space</u></p> <p>Clause SNP12.1 – amend text to read as follows:</p> <p><b>‘Major’ residential development proposals (as defined in the Glossary at page 46) must:</b></p> <ul style="list-style-type: none"> <li><b>a) Provide appropriate play areas and associated equipment on site, or where this is not possible ensure that suitable off-site provision can be secured by a commuted sum payment.</b></li> <li><b>b) Set out proposals for the long-term management of the play areas provided and where appropriate secure this long-term management by a Section 106 Agreement as part of any planning permissions granted.”</b></li> </ul>
PM9	Page 28	<p><u>Policy SNP14 – Adequate Provision of Car Parking</u></p> <p>Delete 7.21 and replace with <b>“SNP14.1”</b>.</p> <p>Clause SNP14.1</p> <p><b>Delete the text of criteria c) and d) in full.</b></p> <p>Clause SNP14.2</p> <p>Amend the words “this criteria is not” to read <b>“these criteria are not”</b>.</p> <p><b>Delete the sub-heading – “Parking Guidance &amp; Requirements”</b>.</p> <p><b>Delete clauses SNP14.5-SNP14.9 in full.</b></p> <p><b>It is recommended that the content of “Parking Guidance and Requirements” be placed in the supporting text for this policy in new paragraphs on page 27 commencing at 7.21 (with subsequent paragraphs re-numbered accordingly)</b></p>

		<b>under the sub-heading of "Car Parking Guidance".</b>
PM10	Page 29	<p><u>Policy SNP15 – Driving in the 21st Century</u></p> <p>Clause SNP15.2</p> <p><b>Delete all text after the first sentence of this clause (including criteria a)-d inclusive).</b></p> <p><b>It is recommended that the material deleted (as above) from the text of the policy be placed in the supporting text for this policy as a new paragraph 7.25 (to replace the existing text of paragraphs 7.25 and 7.26 in full).</b></p> <p>Paragraph 7.22 – 6<sup>th</sup> line: replace "principle" with "<b>principal</b>".</p> <p>Paragraph 7.23 – 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> lines: replace "government" with "<b>Government</b>" in each case.</p>
PM11	Page 30	<p><u>Policy SNP16 - Design</u></p> <p>Criterion b) – 1<sup>st</sup> line: replace "complimentary" with "<b>complementary</b>".</p>
PM12	Page 32	<p><u>Policy SNP17 – Site Levels</u></p> <p>Clause SNP17.4 – 3<sup>rd</sup> line: amend "ordnance datum" to "<b>Ordnance Datum</b>".</p> <p>Clause SNP17.5</p> <p>Delete existing text and replace with:</p> <p><b>"Wherever possible, spoil resulting from development work should be retained on site for use in landscaping works or for other requirements of the permitted development."</b></p>
PM13	Page 32	<p><u>Policy SNP18 – A Treed Landscape</u></p> <p>Amend clause SNP18.2 to read as follows:</p> <p><b>"Development proposals affecting areas of Ancient Woodland in the Plan area, as shown on the Policies Map, should provide long-term and measurable enhancements to them."</b></p>

PM14	Page 33	<p><u>Policy SNP19 – Parish Heritage Assets</u></p> <p>Clause SNP19.1 – 2<sup>nd</sup> line: delete “Parish Heritage Assets” and replace with <b>“the Non-designated Heritage Assets”</b>.</p> <p>Clause SNP19.2 - 1<sup>st</sup> line: delete “Parish Heritage Assets” and replace with <b>“the Non-designated Heritage Assets”</b>.</p> <p>Clause SNP19.3 – 1<sup>st</sup> line: delete “Parish Heritage Assets” and replace with <b>“Non-designated Heritage Assets”</b>.</p>
PM15	Page 34	<p><u>Policy SNP20 – Retention of Assets of Community Value</u></p> <p>1st line: amend “assets of community value” to read <b>“Assets of Community Value”</b>.</p> <p>Paragraph 8.21- 1<sup>st</sup> and 2<sup>nd</sup> lines: amend “assets of community value” to read <b>“Assets of Community Value”</b>.</p> <p>Paragraph 8.24 – 1<sup>st</sup> line: amend the word “affect” to read <b>“effect”</b>.</p> <p>Paragraph 8.25 - 3<sup>rd</sup> and 4<sup>th</sup> lines: amend “assets of community value” to read <b>“Assets of Community Value”</b>.</p>
PM16	Page 36	<p><u>Policy SNP22 – Telecommunications</u></p> <p>Clause SNP22.1 – 2<sup>nd</sup> line: Delete the word “approved” and replace with <b>“supported”</b>.</p>
PM17	Page 4	<p>Paragraph 1.12 – delete existing text and replace with:</p> <p><b>“1.12 The Neighbourhood Plan covers the period from 2019 to 2031. The emerging Horsham District Local Plan 2019-2036 is expected to replace the adopted HDPF during 2021, and it is likely to be necessary to review the Neighbourhood Plan to maintain its general conformity with the strategic policies in the new Local Plan. It will be the role of the Parish Council to review and update the Neighbourhood Plan at an appropriate time following the adoption of the new Local Plan.”</b></p>