

# Pulborough Parish Neighbourhood Plan 2014-2031: Pre-Submission Plan

## Strategic Environmental Assessment (SEA): Environmental Report – April 2020







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# **Glossary of Acronyms**

AA	Appropriate Assessment
ALC	Agricultural Land Classification
AQMA	Air Quality Management Area
DCLG	Department for Communities and Local Government
DPD	Development Plan Document
EA	Environment Agency
EC	European Commission
EU	European Union
На	Hectare
HE	Historic England
HDC	Horsham District Council
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
KSI	Killed or Seriously Injured (statistics)
LB	Listed Building
LCA	Landscape Character Assessment
LPA	Local Planning Authority
MSA	Minerals Safeguarding Area
NE	Natural England
NHS	National Health Service
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PDL	Previously Developed Land
PPG	Planning Practice Guidance
PRoW	Public Right of Way
PTW	Powered Two Wheeler
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SHELAA	Strategic Housing & Employment Land Availability Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SSSI	Site of Specific Scientific Interest
SuDS	Sustainable Drainage System
UK	United Kingdom
WPA	Waste Planning Authority



# 1. Introduction

### 1.1 Background

On behalf of Pulborough Parish Council, Horsham District Council (HDC) as the relevant Local Planning Authority (LPA) commissioned Place Services to undertake an independent Strategic Environmental Assessment (SEA) for the Pulborough Parish Council Neighbourhood Plan.

This Report is the SEA Environmental Report for the Pre-Submission Neighbourhood Plan and follows work undertaken by Place Services on a SEA Scoping Report in August 2019.

### 1.2 The Pulborough Parish Council Neighbourhood Plan

### 1.2.1 Background and work done to date

The Pulborough Parish Council Neighbourhood Plan (referred to hereafter as the Neighbourhood Plan or simply 'the Plan') is being prepared by the Parish Council in accordance with and under the provisions of the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

Pulborough is located within the Horsham District of West Sussex and is identified as a 'small town / larger village' within the emerging Horsham District Local Plan and as a result can be expected to accommodate some growth in accordance with the LPA meeting their objectively assessed needs for housing. The Local Plan also identifies Pulborough as a 'secondary retail centre.' The Neighbourhood Plan as a result is looking to allocate sites for development purposes and also produce locally relevant policies applicable to the Plan area to ensure sustainable development.

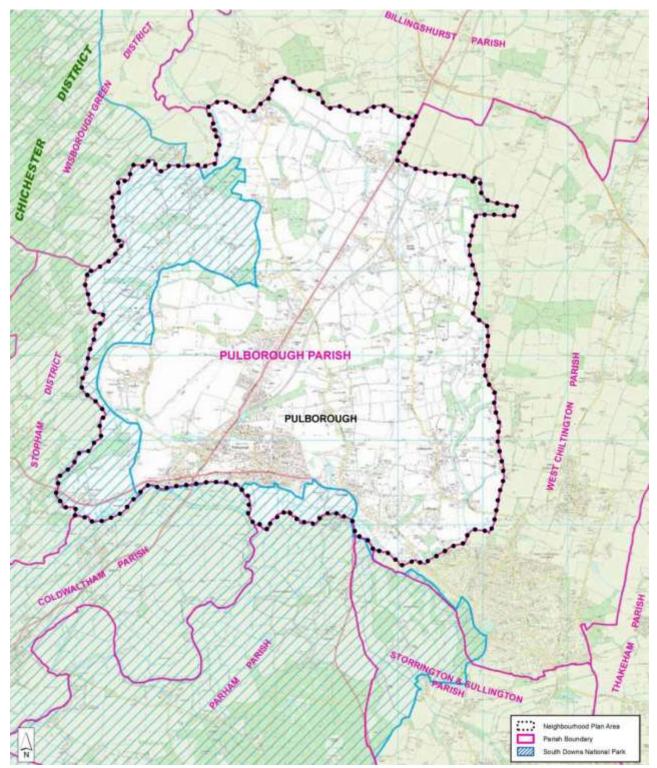
A Neighbourhood Plan was prepared in 2015 and was submitted for consultation both at parish level (Regulation 14) and at district authority level (Regulation 16). As a result of comments made and interviews taking place at district authority level, it was decided by the district authority that the Plan should be returned to the parish for the Neighbourhood Plan Steering Group to re-appraise the site assessment process prior to proceeding through Regulation 14 stage once again.

That site assessment process has now been carried out. Both a Housing Needs Survey Report and a Site Assessment Report have been undertaken by consultants, AECOM. As a result of those reports, some policies have been amended and are evident within the Plan, and the level of housing that needs to be provided has increased to 294 dwellings overall for the Plan period to 2031. Some of that figure of 294 dwellings has already been accounted for in planning applications that have been approved (29 dwellings) or in additional housing that has been granted to areas currently under construction (19 dwellings). The remaining level of housing is the subject of policies contained within the Plan at this stage.

The Neighbourhood Plan area is identified in the figure below.

Strategic Environmental Assessment: Environmental Report







Source: Pulborough Parish Council Neighbourhood Plan, 2019

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### 1.2.2 Legal requirements

Although there is considerable scope for the local community to decide on its planning policies, Plans must meet four 'basic conditions'. These are:

- Is the Plan consistent with national planning policy?
- Is the Plan consistent with local planning policy?
- Does the Plan promote the principles of sustainable development?
- Has the process of making the Plan met the requirements of European environmental standards?

The process of SEA relates specifically to this last requirement, ensuring that the Plan meets the legal requirement of meeting a necessary EU Obligation: the 'SEA Directive<sup>1</sup>'. Following a SEA screening exercise undertaken by Horsham District Council, the Neighbourhood Plan was determined to have a possible effect on the environment through its intention to allocate sites for development purposes and set a framework for future development consent. As a result, this SEA Environmental Report is required as per the SEA Directive and by law.

<sup>&</sup>lt;sup>1</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment



# 2. Strategic Environmental Assessment (SEA)

### 2.1 The Requirement for SEA

The requirement for Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs'

This definition is consistent with the themes of the National Planning Policy Framework (NPPF), which draws upon The UK Sustainable Development Strategy Securing the Future's five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

SEA originates from the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the 'SEA Directive') which came into force in 2001. It seeks to increase the level of protection for the environment; integrate environmental considerations into the preparation and adoption of plans and programmes; and promote sustainable development. The Directive was transposed into English legislation in 2004 by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulation') which requires an SEA to be carried out for plans or programmes,

'subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions'.

This includes some Neighbourhood Plans. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as:

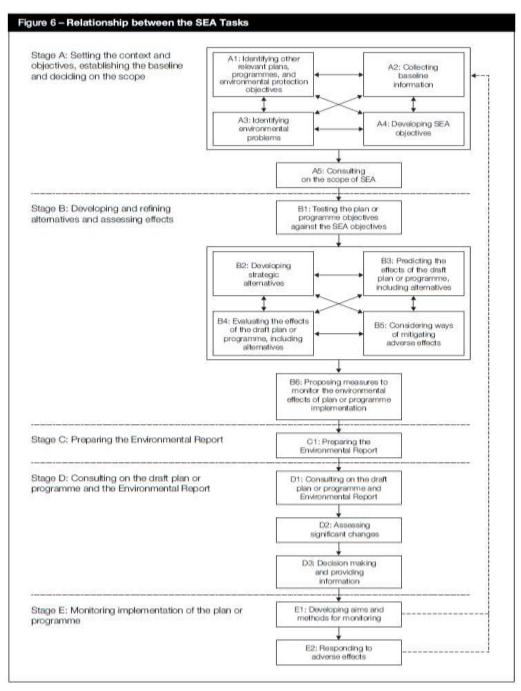
*'biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'* as specified in Annex 1(f) of the Directive.



### 2.2 The SEA Process

The methodology adopted for the SEA of the Neighbourhood Plan at this stage follows 5 sequential stages as documented below.





Source: A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005)



### 2.3 The Scoping Report

A Scoping Report was undertaken in September 2019. The Scoping Report represented Stage A in the SEA process highlighted above, and set the methodology for assessing the Neighbourhood Plan within this SEA Environmental Report.

### 2.4 The Aim and Structure of this Report

The aim of this Report is to respond to Stages B and C of the SEA process shown in the previous figure, to:

- Test the Plan objectives against the SEA Objectives (Stage B1);
- Develop strategic alternatives (Stage B2);
- Predict the effects of the draft Plan, including alternatives (Stage B3);
- Evaluate the effects of the draft Plan, including alternatives (Stage B4);
- Consider ways to mitigate adverse effects (Stage B5); and
- Propose measures to monitor the environmental effects of Plan implementation (Stage B6.

These elements of this Report are included within Section 4 onwards. Section 3 of this Report, reiterates those relevant elements of the Scoping Report, reference to which help the reader understand how the effects predicted within this Report have been identified.



# 3. Sustainability / Environmental Context, Baseline and Objectives

### 3.1 The Scope of the SEA

The SEA of the Neighbourhood Plan is required to set the scope for the assessment of options and Plan content relevant to that Plan area. Stage A of the SEA process sets out how the context and the objectives of the SEA should be set, whilst establishing the baseline relevant to the Plan area. This involves:

- Identifying other relevant policies, plans and programmes, and sustainability objectives;
- Collecting baseline information;
- Identifying sustainability issues and problems; and
- Developing the SEA frameworks (formulating relevant criteria against which the Plan's policy content and site allocations will be assessed).

The following section outlines the relevant plans and programmes and the baseline information profile for the Neighbourhood Plan area and where relevant beyond.

### 3.2 Policies, Plans and Programmes (Stage A1)

Neighbourhood Plans must have regard to existing policies, plans and programmes at national and regional levels and strengthen and support other plans and strategies. It is therefore important to identify and review those policies, plans and programmes and SEA Objectives which are likely to influence the Neighbourhood Plan at an early stage. The content of these plans and programmes can also assist in the identification of any conflicting content of plans and programmes in accumulation with the Neighbourhood Plan. Local supporting documents have also been included within this list as they will significantly shape policies and decisions in the area.

It is recognised that no list of plans or programmes can be definitive and as a result this report describes only the key documents which influence the Plan. Table 1 outlines the key documents, whilst a comprehensive description of these documents together with their relevance to the Plan is provided within Appendix II.

Table 1: Other relevant policies, plans and programmes

#### International plans and programmes

European Commission (EC) (2011) A Resource-Efficient Europe – Flagship Initiative Under the Europe 2020 Strategy, Communication from the Commission to the European Parliament, the Council, The European Economic and Social Committee of the Regions.

European Landscape Convention (Florence, 2002)



European Union Water Framework Directive 2000

European Union Nitrates Directive 1991

European Union Noise Directive 2002

European Union Floods Directive 2007

European Union Air Quality Directive 2008 (2008/50/EC) and previous directives (96/62/EC; 99/30/EC; 2000/69/EC & 2002/3/EC)

European Union Directive on the Conservation of Wild Birds 2009

European Union Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 1992

European Community Biodiversity Strategy to 2020

United Nations Kyoto Protocol

World Commission on Environment and Development 'Our Common Future' 1987

The World Summit on Sustainable Development Johannesburg Summit 2002

Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

The Conservation of Habitats and Species Regulations, 2010

Review of the European Sustainable Development Strategy (2009)

Environment 2010: Our Future, Our Choice (2003)

SEA Directive 2001

The Industrial Emissions Directive 2010

Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU

The Drinking Water Directive 1998

The Packaging and Packaging Waste Directive 1994

EU Seventh Environmental Action Plan (2002-2012)

European Spatial Development Perspective (1999)

European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)

Aarhus Convention (1998)



#### The Convention for the Protection of the Architectural Heritage of Europe

#### National plans and programmes

Working for a Healthier Tomorrow – Dame Carol Black's Review of the health of Britain's working age population, 2008

Tackling Health Inequalities – A Programme for Action 2003 (including the 2007 Status Report on the Programme for Action)

The Egan Review – Skills for Sustainable Communities, 2004

Code for Sustainable Homes, 2014

Sustainable Communities: Building for the Future, 2003

Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM), 2005

Planning policy for Traveller Sites

Biodiversity by Design: A Guide for Sustainable Communities (Town and Country Planning Association), 2004

Guidance on insurance and planning in Flood Risk Areas for Neighbourhood Planning Authorities in England: Association of British Insurers/ National Flood Forum 2013

Biodiversity Indicators in Your Pocket (2010)

Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services

UK Post-2010 Biodiversity Framework

The Guidance for Local Authorities on Implementing the Biodiversity Duty, 2007

Conserving Biodiversity - The UK Approach, 2007

Working with the Grain of Nature: a Biodiversity Strategy for England, 2002

UK National Ecosystems Assessment, 2009-2011

The Conservation of Habitats and Species Regulations, 2010

A Strategy for England's Trees, Woodlands and Forests, 2007

Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)

The Natural Environment and Rural Communities Act, 2006

The Geological Conservation Review (GCR) (ongoing)



Safeguarding our Soils: A Strategy for England (Defra, 2009)

Natural England's Green Infrastructure Guidance, 2009

Waste Strategy for England, 2007

Environment Act, 1995

Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report, 2009

Planning for Climate Change – Guidance and Model Policies for Local Authorities, 2010

Climate Change Act, 2008

Stern Review of the Economics of Climate Change, 2006

UK Carbon Plan, 2011

Energy Act, 2011

Energy White Paper: Meeting the Energy Challenge, 2007

Adapting to Climate Change: A guide for local councils - DEFRA 2010

UKCP18 Science Overview: Executive Summary - Met Office, 2019

Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002

The Countryside in and Around Towns: A vision for connecting town and country in the pursuit of sustainable development, 2005

Wildlife and Countryside Act, 1981

The Countryside and Rights of Way (CRoW) Act, 2000

Natural Environment and Rural Communities Act 2006

Environmental Quality in Spatial Planning 2005

Nature Nearby: Accessible Green Space Guidance, 2010

Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their implementation, 2003

Open Space Strategies: Best Practice Guidance (CABE and the Greater London Authority), 2009

UK Shared Framework for Sustainable Development; One Future- Different Paths, 2005

UK Sustainable Development Strategy: Securing the Future, 2005



Countryside and Rights of Way Act, 2000

World Class Places: The Government's Strategy for Improving Quality of Place, 2009

Building a Greener Future: Policy Statement (July 2007)

Model Procedures for the Management of Land Contamination - Contaminated Land Report 11 (September 2004)

Water Resources Strategy for England and Wales, 2009

Future Water: The Government's Water Strategy for England, 2008

Flood and Water Management Act, 2010

Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management, 2005

Water for People and the Environment: A Strategy for England and Wales, 2009

Underground, Under Threat – Groundwater protection: policy and practice (GP3)

The National Flood and Coastal Erosion Management Strategy for England – DEFRA/ Environment Agency, 2017

Natural Flood Management - Working with Natural Processes - DEFRA /Environment Agency, 2017

Delivering a Sustainable Transport System, 2008

The Future of Transport White Paper – A Network for 2030 (2004)

Low Carbon Transport: A Greener Future - A Carbon Reduction Strategy for Transport, 2009

Historic Environment: A Force for the Future, 2001

The National Heritage Protection Plan (NHHP) 2011-2015

Planning (Listed Buildings and Conservation Areas) Act, 1990

Ancient Monuments & Archaeological Areas Act 1979

The Future of Air Transport White Paper (December 2003) (to be superseded by Developing a sustainable framework for UK aviation once adopted)

Developing a Sustainable Framework for UK Aviation – Scoping document (March 2011)

Aviation Policy Framework, 2013

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, 2007

Planning and Compulsory Purchase Act 2004



#### Planning Act, 2008

World Class Places: The Government's Strategy for Improving Quality of Place, 2009

Localism Act 2011

Planning Practice Guidance (updated)

National Planning Policy Framework (February 2019)

Draft revised National Planning Policy Framework, MHCLG (March 2018)

Community Infrastructure Levy: An Overview, DCLG (9th May 2011)

#### Sub-national plans and programmes

West Sussex Waste Local Plan (April 2014)

West Sussex Joint Minerals Local Plan (July 2018)

West Sussex Energy Strategy 2016-2020

West Sussex Annual Report: A Quality of Life 2018/ 2019

West Sussex Annual Sustainability Report 2018-19

Breathing Better: a partnership approach to improving air quality in West Sussex (May 2018)

Plastics Action Plan – A Commitment from West Sussex County Council 2019- 2021

West Sussex Local Flood Risk Management Strategy 2013- 2018

West Sussex LLFA Policy for the Management of Surface Water (November 2018)

West Sussex Preliminary Flood Risk Assessment (May 2011)

West Sussex Structure Plan 2001-2016 (February 2005)

West Sussex County Council Energy Strategy Action Plan 2019/20 – 2021-22

Joint Materials Resource Management Strategy (JMRMS) for West Sussex 2005- 2035

Pollinator Action Plan – A Commitment from West Sussex County Council 2019-2022

West Sussex Minerals and Waste Development Scheme 2019- 2022

Air Quality and Emissions Mitigation Guidance for Sussex (2019)



#### **District level plans and programmes**

Horsham District Council Core Strategy

Northern West Sussex Strategic Housing Market Assessment - Final Report (May 2009)

Northern West Sussex - Horsham: Strategic Housing Market Assessment Update (October 2012)

Northern West Sussex Housing Market Area – Affordable Housing Needs Model Update (October 2014)

Market Housing Mix - Crawley Borough Council and Horsham District Council (November 2016)

Starter Homes Needs and Implications – Crawley Borough Council and Horsham District Council (November 2016)

Housing Need in Horsham District – Horsham District Council (March 2015)

Horsham District Urban Housing Potential 2004-2018 (February 2005)

Horsham District Planning Framework (HDPF): Assessing Housing Need – update following the Inspectors Initial Findings

The Horsham District Sport, Open Space and Recreation Assessment: February 2014

Northern West Sussex Economic Appraisal/ Part 1 - Employment Land Review - Final Report (September 2009)

Northern West Sussex – Employment Land Review Part 2 – Final Draft Report (October 2010)

Horsham District Council – Retail Needs Study (June 2010)

Market Appraisal on the Current and Potential Future Demand for Business Space in the Horsham District (February 2014)

Northern West Sussex Economic Growth Assessment Main Report (April 2014)

Assessment of the Commercial Property Market – Focussing on Supply and Demand for Property South of the District together with an overview of Demand for the entire District (June 2016)

Horsham District Hotel & Visitor Accommodation Study (July 2016)

Horsham Town Retail & Leisure Study 2017 (March 2017)

Horsham District Landscape Character Assessment (October 2003)

Acting Together on Climate Change – A Strategy for Horsham District (June 2009)

Gatwick Sub Region – Outline Water Cycle Study – Final Report (January 2011)

Horsham District Council Detailed Assessment Report, Cowfold Air Quality: Local Air Quality Management Environment Act 1995 (March 2011)



Partnership Management Plan – Shaping the Future of Your South Downs National Park 2014- 2019 (2013)

Horsham District Council Strategic Flood Risk Assessment – Final Report (June 2007)

Horsham District Landscape Capacity Assessment (April 2014)

Green Infrastructure Strategy: Horsham District Planning Framework (April 2014)

Habitats Regulations Assessment of the Horsham District Planning Framework (April 2014)

Horsham District Council – Settlement Sustainability Review

The High Weald AONB: An outstandingly beautiful Medieval landscape – Management Plan 2019- 2024

Air Quality Annual Status Report for Horsham District Council 2019 (June 2019)

Horsham District Council Local Development Scheme 2019-2022

Horsham District Council Statement of Community Involvement (February 2017)

Local reports and assessments (Evidence Base)

Pulborough Parish Employment Land Report (March 2018)

Pulborough Parish SHELAA Housing Land Report (December 2018)

Pulborough Village Transport Plan (February 2010)

Pulborough Community Action Plan 2012-2015

Pulborough Design Statement Supplementary Planning Document (May 2013)

Rural Community Profile for Pulborough – Action with Communities in Rural England (ACRE) Rural evidence project (November 2013)

Housing Needs Survey Report, Pulborough Horsham District - Action in Rural Sussex (May 2011)

Brinsbury Centre of Rural Excellence Supplementary Planning Document – Horsham District Local Development Framework (February 2009)

Pulborough Parish Neighbourhood Plan 2015- 2031 – Draft Sustainability Appraisal/ Strategic Environmental Assessment (June 2015)

Pulborough Neighbourhood Plan – Stage 1 Report Part A (November 2014)

Pulborough Neighbourhood Plan – Stage 1 Report Part B: Community Evidence (November 2014)

Pulborough Parish Neighbourhood Plan 2015- 2031 – Pre Submission Plan (June 2015)



Pulborough Parish Neighbourhood Plan 2015- 2031 – Submission Plan (October 2015)

Pulborough Neighbourhood Plan Survey (2014)

Nutbourne Village Design Statement (2006)

Pulborough Neighbourhood Plan Site Assessment - Pulborough Parish Council 20th February (AECOM, 2019)

### 3.3 Collecting Baseline Information (Stage A2)

This sub-section details the Baseline Information profile for the Plan area specifically as well as of neighbouring areas that are considered relevant to the content of the Neighbourhood Plan. The following section outlines a summary of the key baseline information and therefore the current state of the environment for the Plan area. The SEA Directive requires the production of the following information:

'The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;" Annex 1(b);

The environmental characteristics of areas likely to be significantly affected;" Annex 1(c); and

Any existing problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance such as areas designated pursuant to Directives 79/409/EEC and 92/43/ECC" Annex 1(d).'

The baseline information identifies current sustainability issues and problems in the Plan area which should be addressed and provides a basis for predicting and monitoring the effects of implementing the document. To ensure the data collected was relevant and captured the full range of sustainability issues, it was categorised under thematic topics. They cover all the topics referred to in Annex 1(f) of the SEA Directive and follow the order of:

- Economy and employment
- Housing
- Population and society
- Health and wellbeing
- Transport and connectivity
- Cultural heritage
- Biodiversity and nature conservation
- Landscapes
- Water
- Climate and energy
- Air



#### • Waste, soils and Minerals

Appendix I of this Report outlines the full baseline information profile for the Plan area, and where relevant, Horsham District. The key sustainability issues for the Plan area are outlined in the following sub-section.

# 3.4 Sustainability Issues & Problems (Stage A3) and the formulation of SEA Objectives (Stage A4)

The outcome of the above processes related to the identification of relevant plans and programmes and the baseline information profile of the Plan area is the identification of key sustainability and environmental issues. These represent those sustainability and environmental problems facing the Plan area which assist in the finalisation of a set of relevant SEA Objectives that can be subsequently expanded upon in a SEA Framework.

The assessment of the Plan will be able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the Plan's content. The following table outlines the thought process which has led to the formulation of the SEA Objectives for the Plan.

General Theme	Focused Theme	Description / Supporting Evidence
Population and society	Ageing population	Pulborough has a population number of 5,205 as taken from the 2011 census. The average age of the population is older than the national and county averages with higher percentages in the 45-64 age bracket (at 29.9% of the local population) and the 65+ age bracket (23.1% of the local population).
Health & Wellbeing	Healthcare infrastructure	Access to healthcare is limited in the District, with a lack of a major hospital close by alongside the rural nature of the District. Horsham is projected to have a rise in people aged over 75, and therefore demand across the different care types is estimated to rise by 88%.
	Suitable homes for an ageing population	People aged 65+ have the highest risk of falling, and approximately 59,027 may be expected to fall each year in West Sussex according to the College of Occupational Therapists. Falls are the largest cause of emergency hospital admissions for older people, with 4,199 admissions in 2014/15 for injuries caused by falls for people aged 65+ in West Sussex
Housing	Housing type	The percentage of semi-detached / terraced homes in Pulborough (at 39.58%) is lower than that of the District (at 45%).
	Housing type / Affordability	The 'Housing Needs Survey Report' for Pulborough (2011) indicates that at the time of writing, a total of 71 (91% of survey respondents) households had an income below £24,999 per annum which is the lowest level income that would be

#### Table 2: Key Sustainability Issues and Problems



General Theme	Focused Theme	Description / Supporting Evidence	
		considered for shared ownership housing or for rent. Many Pulborough residents therefore may still not meet the requirements/ cannot afford to buy a home within the survey study area.	
Economy & Employment	Location of commercial premises	Commercial premises in Pulborough are dispersed, with no traditional 'centre' for retail and social activities. The emerging Horsham Local Plan identifies Pulborough as a 'secondary retail centre'.	
Biodiversity & Nature Conservation	Protected Species	As identified by the South Downs National Park Authority in a consultation response to the previous Pulborough Neighbourhood Plan Regulation 16 consultation, construction of new development could have the potential to "resul in likely significant effects upon the barbastelle bats of the Mens SAC via direct habitat loss or disturbances from lighting, noise and vibrations both during construction and operational phases of development".	
	Proximity of Habitats Sites	The Arun Valley Special Protect Area (SPA)/Ramsar (Habitats Site) is adjacent to the Plan area and consists of three component Sites of Special Scientific Interest (SSSI), Pulborough Brooks SSSIs, Amberley Wild Brooks SSSIs and Waltham Brook SSSI. The Plan area is also within 7km of the Mens Special Area of Conservation (SAC) (also a Habitats Site).	
	Wildlife designations	In Pulborough, there are six Local Nature Reserves and two SSSIs.	
	Priority Habitats	Pulborough Parish contains approximately 20 areas identified by Natural England as Priority Habitats which are subject to Habitat Action Plans.	
Historic Environment	Archaeological deposits	Pulborough is an area well known for its Roman archaeology.	
	Heritage assets	There are two Grade I Listed Buildings in the Parish: Stopham Bridge and The Parish Church of St. Mary, and 124 Grade II listed buildings. The historic narrow streets of Pulborough are an issue for accommodating development and relieving traffic; the widening of roads presents a challenge.	
	Conservation Areas	There are three Conservation Areas within the Neighbourhood Plan area: the 'Pulborough Lower Street Conservation Area'; the 'Pulborough Church Place Conservation Area'; and the 'Nutbourne Conservation Area.'	
Landscape	Landscape Character	<ul> <li>The Horsham District Landscape Character Assessment identifies sensitivities to the landscape character as:</li> <li>Large scale housing developments</li> <li>Large scale commercial / industrial development</li> </ul>	



General Theme	Focused Theme	Description / Supporting Evidence		
		<ul><li>Minor road improvements</li><li>Decline in traditional land management.</li></ul>		
	Location of the South Downs National Park	Parts of the Plan area to the west and south are within the South Downs National Park. The South Downs National Park Authority (SDNPA) Local Plan outlines planning policies and protection objectives that will need to be factored into the Neighbourhood Plan.		
		Previous iterations of the Neighbourhood Plan (in 2015) received consultation comments by the SDNPA that expressed concerns surrounding external lighting, the prevention of encroachment and urbanising infrastructure.		
	Landscape Sensitivity	A Landscape Capacity Assessment (2014) identifies Pulborough (and the wider Plan area) as having no to low capacity to accommodate large scale housing and employment development in most areas bordering the built up area, with the exception of an area to the north east of the built up area of Pulborough. This area (with low to moderate capacity) is located to the east of Drovers Lane and Glebelands and extends further eastward to Broomers Hill Lane.		
Water Environment	Groundwater	Much of the groundwater under the southern region of the District (such as Storrington, Steyning and Pulborough) forms a major aquifer. The Plan area is entirely within Groundwater Source Protection Zone 3 (Total Catchment). Such zones surround an abstraction point for public water supply and are therefore important to protect from any potential sources of contamination.		
	Water Quality	There is concern that future development may reduce river flows, meaning less water is available to dilute sewerage, thereby impacting water quality. The River Arun has low summer flows and so, any deterioration in water quality could affect the Arun Valley SPA		
	Flood risk	The frequency and duration of winter flooding at Pulborough Brooks has increased significantly in the last twenty years while 2012 recorded the first extended summer flooding. The causes of increased flooding are believed to include the effects of climate change and land-use changes in the catchment such as building on flood plains and faster run-off from hard surfaces associated with development.		
Transport & Connectivity	A-Road Capacity	The A29 Stane Street is a well-used primary route between London and the South Coast and whilst it has improved over the years, it still is a single carriageway road for most of its length. The A29 passes through Pulborough and there are a number of constraints where the road is below modern standards for route carrying such a heavy volume of traffic. These constraints are particularly		

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General Theme	Focused Theme	Description / Supporting Evidence		
		noticeable at Swan Corner (where the A29 and A283 meet), Church Hill and Sopers Hill.		
	Lower Category Road Capacity	The roads throughout Pulborough are very narrow, making it difficult to accommodate vehicles. All traffic counts suggest that two recent supermarkets in London Road are major attractors of traffic, especially from the north and east of the village as well as within the village itself		
	Road Safety	The number of road casualties in Horsham District has increased from 277 in 2012/13 to 322 in 2013/14.		
	Pedestrian and Cycling Infrastructure	The A29 and A283 routes in Pulborough are particularly difficult for cyclists to use due to the volume of traffic and uneven surfaces. The existing pedestrian links in Pulborough are far from satisfactory, particularly in the historical areas of the village that generate the most pedestrian movement.		
Air Quality & Noise	Carbon Emissions	Horsham District had the highest tonnage of carbon dioxide emitted compared with all the district/borough Councils in West Sussex (a total of 968kt CO2). Carbon emissions for Horsham District were spread across three sectors with 34% coming from industry and commerce, 34% coming from Domestic and 32% resultant from Transport. In Horsham, 77% of air pollution is produced by motor vehicles		
	Road and Rail Noise Levels	Noise maps indicate that there are noise pollution issues within Pulborough associated with the A29 London Road. Average road traffic noise levels of 70.0 - 74.9 decibels can be experienced along this stretch of road, with noise dissipating outwards from the road itself. There are similar issues surrounding the railway line, with average rail traffic noise levels of generally up to 60.0 - 64.9 decibels in the day, with small pockets of the line within the Plan area that experience levels of 65.0 – 69.9 decibels.		
Minerals & Waste	Minerals Safeguarding	<ul> <li>As identified within the West Sussex Joint Minerals Local Plan, 2018 (adopted by West Sussex County Council and the South Downs National Park Authority)</li> <li>Pulborough is located within the following Minerals Safeguarding Areas MSAs): <ul> <li>Soft Sand (including potential Silica Sand) Mineral Safeguarding Area (including 250m buffer)</li> <li>Brick Clay (weald Clay Formation) Resource Mineral Safeguarding Area (including 250m buffer)</li> <li>Building Stone Mineral Safeguarding Area (including 250m buffer)</li> </ul> </li> </ul>		

The following table explores whether the identified SEA Objectives above fall into the three broad categories of sustainability, namely social, environmental and economic themes.

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#### Table 3:The SEA Objectives

SA Objective	Environmental	Social	Economic
1. To improve the health of the population overall and reduce health inequalities		$\checkmark$	
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure		$\checkmark$	$\checkmark$
3. To meet the housing requirements of the whole community		$\checkmark$	$\checkmark$
4. To ensure no deterioration of water quality	$\checkmark$	$\checkmark$	
5. To maintain and where possible improve air and noise quality	$\checkmark$	$\checkmark$	
6. To reduce emissions of greenhouse gases from energy consumption	$\checkmark$	$\checkmark$	
7. To reduce vulnerability and increase resilience to extreme weather events and flooding	$\checkmark$	$\checkmark$	$\checkmark$
8. To conserve and enhance biodiversity and geodiversity	$\checkmark$	$\checkmark$	
9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance	$\checkmark$	$\checkmark$	$\checkmark$
10. To conserve and enhance the quality and local distinctiveness of landscapes including the South Downs National Park	$\checkmark$	$\checkmark$	$\checkmark$

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SA Objective	Environmental	Social	Economic
11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function		$\checkmark$	$\checkmark$
12. To promote sustainable transport, walking any cycling uptake and encourage efficient patterns of movement	$\checkmark$	$\checkmark$	$\checkmark$

### 3.4.1 The Compatibility of the SEA Objectives

A total of 16 SEA Objectives have been derived for the appraisal of the Plan. They are based on the scope of the document, policy advice and guidance and to the assessment of the current state of the environment.

It is useful to test the compatibility of SEA Objectives against one another in order to highlight any areas where potential conflict or tensions may arise. It is to be expected that some objectives are not compatible with other objectives thereby indicating that tensions could occur. Objectives which are based around environmental issues sometimes conflict with economic and social objectives, and vice versa.

Areas of potential incompatibility or uncertainty between the objectives relevant to the Plan are explained within the following bullet points:

- Protecting landscapes and townscapes and the majority of the economic and social based objectives: Notionally, it may be difficult to avoid harm in regard to minimising Greenfield development with all other objectives relevant to growth needs within the Plan area, should such land be allocated for development.
- Sustainable transport and the need to ensure access: The promotion of the uptake of sustainable transport modes can be seen as potentially incompatible with the needs of ensuring appropriate linkages to the existing road network. Although truly sustainable outcomes can be seen to correspond to a modal shift to sustainable transport methods, notions of inclusivity determine that safe and efficient road access must also be ensured to reflect the baseline of car ownership and the reality that sustainable transport modes can not be considered suitable for all demographics.
- Health / open space and recreation based objectives with those associated with recreation and wildlife conservation / enhancement: Although similar in form, it must be noted that the inclusion of recreational land should largely be provided in isolation from those areas that have been identified as contributing to green infrastructure. Similarly, land for purely landscape purposes should be managed in a way that offers either recreational or biodiversity value. The impacts of recreational activity on biodiversity and wildlife conservation can be significantly damaging to habitats.
- Historic Environment conservation / enhancement with general development needs: Historic Environment assets can come in many forms and in the built and natural environment. With this in mind, it is inevitable that there will be a degree of conflict between protection



objectives and those that seek to ensure development needs are met.

• The protection of Habitats Sites and the need for growth in the Plan area: The Plan area is in close proximity to a number of Habitats Sites that may be sensitive to identified growth in the Plan either individually or cumulatively. Effects may be realised due to the location of development to the Habitats Sites, pathways to the Habitats Sites, or even as a result of an increase in population in the area (linked to possible recreational impacts). Although effects will be more appropriately identified in Habitats Regulations Assessment (HRA) Screening or possibly through an Appropriate Assessment (AA) of the Plan if required, the notional possibility of significant effects on these designated sites may be forthcoming unless mitigation measures are embedded into the Plan.

### 3.5 The Approach to Assessing the Plan

### 3.5.1 Introduction

As previously set out, the Plan includes specific development proposals, and detailed policies to ensure sustainable development within the Plan area over the Plan period.

The SEA, in line with the scope of the Plan, is required to assess the impacts of the Plan's content. For this purpose, and as required of SEA, a broad SEA Framework has been devised for the Plan's policy content and a separate SEA Framework devised for site allocation options. The SEA Frameworks take the SEA Objectives identified previously in this report as a starting point, and elaborate on each objective in turn with a series of criteria or 'key questions' to aid the assessment of the Plan's content in more detail.

### 3.5.2 The SEA Framework for Assessing Policy Content

The following SEA Framework forms the basis of the methods used to evaluate the effects of the Plan's policy content and any 'reasonable alternative' options where relevant. Quantitative analysis is used where available; however a number of assumptions are required in order to make qualitative and comparable judgements to assess options to the same level of detail. It is important that a level playing field is ensured for the assessment of options, with the same level of information being used in the assessment. Assumptions are set out in the relevant sections of this SEA in which specific elements of the Plan are assessed.

SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
1. To improve the health of the population overall and reduce health inequalities	<ul> <li>Does it address the requirements of an ageing population?</li> <li>Will it improve access to health facilities and social care services?</li> <li>Will it encourage healthy lifestyles?</li> </ul>	<ul> <li>Life Expectancy</li> <li>Indices of Multiple Deprivation – sub- domain scores</li> <li>Residents opinion on availability of open space/leisure facilities</li> </ul>

#### Table 4: SA Framework for Assessing the Plan



SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
	<ul> <li>Will it support special needs and an ageing population?</li> <li>Will it increase access to open countryside?</li> <li>Will it increase access to public open space?</li> <li>Will it improve access to community facilities?</li> <li>Will it reduce noise and odour concerns?</li> <li>Does the proposal retain and enhance existing open and natural spaces?</li> <li>Does it seek to and consider the remediation of contaminated land?</li> </ul>	<ul> <li>Natural England Accessible Natural Greenspace Standards (ANGSt)</li> <li>Location and extent of recreational facilities to development sites</li> <li>Location and extent of accessible greenspace to development sites</li> <li>Proximity of site to healthcare facilities</li> <li>Percentage of population obese</li> <li>Percentage of sites coming forward on contaminated land</li> </ul>
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	<ul> <li>Does it seek to ensure sufficient infrastructure to support new development?</li> <li>Will it improve access to primary / secondary schools?</li> <li>Will it reduce poverty and social exclusion in those areas most affected?</li> <li>Will it maintain and improve access to key services and facilities for all sectors of the population? /Does the proposal retain or re-provide existing social infrastructure?</li> </ul>	<ul> <li>Access to open space</li> <li>Natural England Accessible Natural Greenspace Standards</li> <li>Residents opinion on availability of open space/leisure facilities</li> <li>Indices of Multiple Deprivation – sub- domain scores (barriers to services)</li> <li>S106 agreement contributions</li> <li>Trends in primary school capacities</li> <li>Number of GPs and dentists accepting new patients</li> </ul>
3. To meet the housing requirements of the whole community	<ul> <li>Does the proposal include Lifetime Homes?</li> <li>Will it meet the housing requirements of the whole community?</li> <li>Will it reduce homelessness?</li> <li>Will it contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing?</li> <li>Will it reduce the number of unfit homes?</li> <li>Does the proposal include homes that can be adapted to support independent living for older and disabled people?</li> </ul>	<ul> <li>Trends in House Prices</li> <li>Affordable units completed, including rural exception sites</li> <li>Dwelling stock below the 'Decent Home Standard'</li> <li>Indices of Multiple Deprivation Score – particularly Housing and Services Domain and the Living Environment Deprivation Domain</li> <li>Annual dwelling completions</li> <li>Population projections and forecasts</li> </ul>



SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects		
	• Does the proposal address the housing needs of older people, through specific design requirements?			
4. To ensure no deterioration of water quality	<ul> <li>Will it protect and enhance water resources?</li> <li>Will it support the achievement of Water Framework Directive targets?</li> <li>Will it protect and improve the quality of inland waters?</li> <li>Will it promote the sustainable use of water?</li> <li>Will it maintain water availability or water dependent habitats?</li> <li>Will it support the provision of sufficient water supply and treatment infrastructure?</li> <li>Does the proposal incorporate sustainable design and construction techniques?</li> <li>Will it protect and enhance protected sites under the habitats directive?</li> </ul>	<ul> <li>Water quality (and trends) in river basin district (river quality data).</li> <li>Compliance with emission limits in identified locations.</li> <li>Compliance with environmental quality standards in identified locations.</li> <li>Percentage of water bodies at good ecological status or potential</li> <li>Percentage of water bodies assessed at good or high biological status</li> <li>Percentage of water bodies assessed at good chemical status</li> </ul>		
5. To maintain and where possible improve air and noise quality	<ul> <li>Will it protect and improve air quality?</li> <li>Does the proposal minimise noise pollution caused by traffic, rail and commercial uses?</li> <li>Does the proposal incorporate sustainable design and construction techniques to combat nearby sources of noise?</li> </ul>	<ul> <li>Trends in ambient noise levels</li> <li>NO2 emissions</li> <li>Conditions regarding noise and air mitigation in granted planning applications</li> </ul>		
6. To reduce emissions of greenhouse gases from energy consumption	<ul> <li>Will it reduce emissions of greenhouse gases/head of population by reducing energy consumption?</li> <li>Will it increase the proportion of energy needs being met by renewable sources?</li> <li>Does the proposal incorporate renewable energy?</li> <li>Does the proposal contain homes that are highly energy efficient?</li> <li>Does it seek to integrate climate change mitigation and adaptation measures into the historic environment sensitively?</li> </ul>	<ul> <li>Carbon Dioxide emissions</li> <li>Energy consumption GWh/households</li> <li>Trends in recorded PM10 emissions</li> <li>Percentage of energy supplied from renewable sources.</li> </ul>		



SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
7. To reduce vulnerability and increase resilience to extreme weather events and flooding	<ul> <li>Will it not lead to a deterioration of water availability?</li> <li>Will it minimise the risk of flooding to people and property from rivers and watercourses?</li> <li>Will it reduce the risk of damage to people and property from extreme weather events?</li> <li>Does the proposal incorporate sustainable design and construction techniques?</li> <li>Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?</li> <li>Does the proposal incorporate sustainable urban drainage techniques?</li> </ul>	<ul> <li>Residential properties flooded from main rivers</li> <li>Planning permission in identified flood zones granted permission contrary to advice from the Environment Agency</li> <li>Incidences of flooding and location</li> <li>Incidences of flood warnings in Plan area</li> <li>Number of applications where there was a failure to pass the sequential test, even though sites at lower risk of flooding were available, but other planning reasons were given for granting planning permission.</li> </ul>
8. To conserve and enhance biodiversity and geodiversity	<ul> <li>Will it conserve and enhance natural/semi natural habitats?</li> <li>Will it maintain and enhance Habitats Sites (SPAs, SACs, Ramsar sites)?</li> <li>Will it maintain and enhance nationally designated nature conservation sites?</li> <li>Will it maintain and enhance locally designated nature conservation sites?</li> <li>Will it avoid disturbance or damage to protected species and their habitats?</li> <li>Will it help deliver the targets and actions for habitats and species within Biodiversity Action Plans?</li> <li>Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?</li> <li>Will it lead to the creation of new habitat?</li> <li>Does the proposal maintain or enhance biodiversity?</li> </ul>	<ul> <li>Spatial extent and condition of designated sites within and adjacent to the Plan area</li> <li>Achievement of Biodiversity Action Plan targets</li> <li>Number of applications granted with accompanying ecological assessment / project-level HRA</li> <li>Ecological potential assessments</li> <li>Condition of the nearest sensitive receptors (where viable)</li> <li>Site visit surveys on typical abundance and frequency of habitats (DAFOR scale)</li> </ul>
9. To conserve and where appropriate	• Will it protect and enhance buildings, monuments, sites, places, areas and	<ul> <li>Impact on the 'at risk' status of assets.</li> </ul>



SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
enhance areas and assets of historical and archaeological importance	<ul> <li>landscapes of heritage interest or cultural value (including their settings)?</li> <li>Does it seek to ensure the protection and enhancement of the Conservation Areas?</li> <li>Will it protect sites, features and areas of archaeological value in both urban and rural areas?</li> <li>Does it seek to eradicate the loss, or erosion, of the historic character of the landscape / townscape?</li> <li>Respect, maintain and strengthen local character and distinctiveness?</li> <li>Will it contribute to the better management of heritage assets and tackle heritage at risk?</li> <li>Does it seek to provide for increased access to and enjoyment of the historic environment?</li> <li>Does it seek to promote heritage-led regeneration / help to reduce the number of vacant buildings through adaptive reuse?</li> </ul>	<ul> <li>Loss of, or damage to, any heritage asset and/or its setting</li> <li>Trends regarding the 'Buildings At Risk Register'</li> <li>Percentage of conservation area demolished or otherwise lost.</li> <li>Amount of derelict properties and/or vacant land</li> <li>Number of heritage assets being positively removed from the heritage at risk register</li> <li>Amount of damage to listed buildings or scheduled monuments</li> <li>Management of designated and undesignated historic environment assets</li> <li>Numbers of undesignated historic environment assets lost through the planning process.</li> </ul>
10. To conserve and enhance the quality and local distinctiveness of landscapes including the South Downs National Park	<ul> <li>Does it seek to ensure that the protection objectives of the South Downs National Park Local Plan are upheld?</li> <li>Will it reduce the amount of derelict, degraded and underused land?</li> <li>Will it protect and enhance the settlement and its setting within the landscape?</li> <li>Will it protect and enhance landscape character?</li> <li>Will it minimise the loss of open countryside to development?</li> <li>Will it minimise loss of the best and most versatile agricultural land to development?</li> <li>Does the proposal make best use of existing land?</li> <li>Will it maintain and enhance soil quality?</li> </ul>	<ul> <li>Developments permitted contrary to Landscape Character Assessment 'sensitivities to change'.</li> <li>Number and extent of field boundaries affected.</li> <li>Proportional loss of Grade 2 agricultural land.</li> <li>Proportion of development directed to Grade 3 agricultural land.</li> <li>Proportion of development on brownfield land.</li> </ul>



SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function	<ul> <li>Will it improve business development and enhance competitiveness?</li> <li>Will it promote growth in key sectors?</li> <li>Will it encourage rural diversification?</li> <li>Will it encourage inward investment?</li> <li>Will it make land available for business or commercial development?</li> <li>Is there a range of retail uses, including food stores and smaller shops for social enterprises?</li> <li>Does the proposal include managed and affordable workspace for local businesses?</li> <li>Will it conserve identified mineral resources (as an economic resource)?</li> <li>Will it increase the range of employment opportunities, shops and services available?</li> <li>Will it decrease the number of vacant units?</li> <li>Does it seek to ensure the concentration of services within an accessible location?</li> <li>Will it enhance the viability and vitality of the village's retail function?</li> </ul>	<ul> <li>Employment land availability</li> <li>Percentage change and comparison in the total number of VAT registered businesses in the area</li> <li>Businesses by industry type</li> <li>Amount of vacant industrial floorspace</li> <li>Travel to work flows</li> <li>Employment status by residents and job type</li> <li>Economic activity of residents</li> <li>Proportion of business in rural locations</li> <li>Amount of retail, leisure and office floorspace in centres.</li> <li>Implemented and outstanding planning permissions for retail, office and commercial use</li> </ul>
12. To promote sustainable transport, walking any cycling uptake and encourage efficient patterns of movement	<ul> <li>Will it reduce out-commuting?</li> <li>Will it lead to a general reduction in transport emissions?</li> <li>Will it lead to the inclusion of electric vehicle charging points?</li> <li>Will it ensure development is located in close proximity to jobs, services and facilities?</li> <li>Will it improve accessibility by public transport, walking and cycling?</li> <li>Would it promote the use of sustainable travel modes and reduce dependence on the private car?</li> </ul>	<ul> <li>NO2 emissions</li> <li>Recorded traffic flows</li> <li>Percentage of new developments with electric vehicle charging points</li> <li>Access to services and business' by public transport</li> <li>Indices of Multiple Deprivation</li> <li>Travel to work methods and flows</li> <li>Car ownership</li> <li>Killed or Seriously Injured (KSI) casualties for adults and children</li> <li>Network performance on roads</li> <li>Public transport punctuality and efficiency</li> </ul>



### 3.5.3 The SEA Framework for Assessing Site Options

The following SEA Framework forms the basis of the methods used to evaluate the effects of the Plan's site allocations and reasonable alternatives. Quantitative analysis is favoured to assess options to the same level of detail and to aid the Parish Council in the selection / rejection of options. To this extent, it should be noted that any site information that has been submitted as part of or accompanying any planning application, where this is the case for any site option, has been omitted from consideration unless there is a comparable level of information coming forward in this manner for all site options in the Plan area. It should also be recognised that the assessment of sites within the forthcoming SEA Environmental Report is a strategic undertaking and the level of assessment is commensurate to the level of detail required of a planning policy document.

The framework in the following table outlines the methodology for assessing site options, including how quantitative information relates to certain degrees of impact or effect. The overarching SEA Objectives identified in this SEA Scoping Report have been replicated in this framework as they represent the key issues and objectives for the Plan area. Expanding on these, quantifiable information is used where relevant related to each of these objectives.

It should be noted that the assessment of options at the Plan level within this SEA Environmental Report is a strategic undertaking (unlike project level environmental assessment work such as Environmental Impact Assessments) and the information presented can only be used within this specific context.

A lot of work has been undertaken by the LPA in assessing sites within Horsham, specifically through the Strategic Housing and Employment Land Availability Assessment (SHELAA). The SHELAA has filtered or 'sieved' out sites based on absolute constraints, which has left a shortlist of sites that are considered notionally suitable for consideration. The SEA Framework in the following table draws upon some of this information (methodology and assessment findings) where relevant.



#### Table 5: SEA Framework for Assessing the Plan's Site Options

SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
1. To improve the health of the population overall and reduce health inequalities	(1.1) Will the site see a loss of land classified as 'open space'?	SHELAA	Proposal includes a variety of open space	Proposal includes additional open space	Loss of open space, some compensation	Loss of open space, no compensation	Where applicable	No net loss of open space
	(1.2) Might the site be located on contaminated land?	Mapping and previous land use	N/A	Proposal is not located on land that has a previous use associated with potential contamination	N/A	N/A	Proposal is located on land that has a previous use associated with potential contamination	N/A
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	(2.1) Accessibility to local education facilities	GIS mapping / SHELAA	N/A	Primary/Secondary school within 800m/10 minutes walking distance	No educational facilities within 800m/10 minutes walking distance	N/A	Where applicable	Where applicable
	(2.2) Accessibility to local healthcare services	GIS mapping / SHELAA	N/A	Healthcare service within 800m/10 minutes walking distance	No healthcare services within 800m/10 minutes walking distance	N/A	Where applicable	Where applicable

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SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
	(2.3) Accessibility to both retail and service provision for day to day needs	GIS mapping / SHELAA	N/A	Retail or service provision within 800m/10 minutes walking distance	No retail or service provision within 800m/10 minutes walking distance	N/A	Where applicable	Where applicable
	to local employment opportunitiesSHELAAopportunity w 800m/10 min walking distar(2.5) Fibre broadband availabilitywww.openreach.com broadband availableFibre or wireless broadband availableFibre broadband planned or underway to b completed by	Local employment opportunity within 800m/10 minutes walking distance	No local employment opportunities within 800m/10 minutes walking distance	N/A	Where applicable	Where applicable		
		www.openreach.com	broadband	Fibre broadband planned or underway to be completed by September 2019	Not in plans for an upgrade to superfast broadband / No broadband coverage	N/A	Where applicable	Where applicable
	(2.6) Distance to main employment areas	GIS / Aerial Mapping	Within 500m of existing employment area	Less than or equal to 500-1,000m from existing employment area	Between 1,500+ from existing employment area	N/A	Between 1,000- 1,500m from existing employment area	Where applicable

								JERVICES
SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
3. To meet the housing requirements of the whole community		information is required to considered a 'policy issu				cted or can be relied	upon at the strategic '	Plan' level. As such,
4. To ensure no deterioration of water	(4.1) Proximity of any water bodies	GIS mapping	Over 200m	Over 100m	Within 50m / adjacent	N/A	Within 100m	N/A
quality	(4.2) Is the site within a ground water source protection zone?	GIS mapping	N/A	Not in GPZ	Within outer zone (Zone 2, Zone 2c)	Within inner zone (Zone 1, Zone 1c)	Within total catchment (Zone 3)/ where applicable	Where applicable
5. To maintain and where possible improve air and noise quality	(5.1) Would the site experience noise / is it in close proximity to road traffic or the railway?	GIS SHELAA layer / Extrium maps	Where applicable	No noise sources identified on site	Site would experience road / rail noise at 65- 69.9 decibels in the day	Site would experience road / rail noise at 70 decibels or more in the day	Site would experience road / rail noise at 55- 64.9 decibels in the day	Where applicable
	(5.2) Is the site within proximity to mineral extraction or waste	West Sussex Joint Minerals Local Plan (2018)	Where applicable	Site is beyond 250m of either an existing or proposed site for	Site is within 250m of either an existing or proposed site for	N/A	Where applicable	Where applicable

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SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
	management facilities?			mineral extraction or a site either existing as or allocated for a waste management facility.	mineral extraction or a site either existing as or allocated for a waste management facility.			
6. To reduce emissions of greenhouse gases from energy consumption.	There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.							
7. To reduce vulnerability and increase resilience to extreme weather	(7.1) Is the site within Flood Risk Zone 2 or 3?	GIS mapping of SHELAA sites SHELAA assessment on "Flood Risk"	Site is wholly within Flood Zone 1	Site contains a minimum of 80% Flood Zone 1	Site is within Flood Zone 2	Site is within Flood Zone 3a/b	Uncertain (to include commentary in appraisal)	Uncertain (to include commentary in appraisal)
events and flooding.	(7.2) Is the site in an area of high / medium / low / very low risk of	Environment Agency Flood Maps	Very low	Low	High	N/A	Medium Risk/ on zone boundary/ Where applicable	Where applicable

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SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
	flooding from surface water?							
8. To conserve and enhance biodiversity and geodiversity	(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	GIS mapping / SHELAA	Site is not within an IRZ / ZOI	Site is within an IRZ but would not require consultation with Natural England	N/A	N/A	Site is within an IRZ and requires consultation with Natural England	Where applicable
	(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	GIS mapping / SHELAA	N/A	Development would not have a detrimental impact	Development likely to have a detrimental impact	N/A	Where applicable	Where applicable
	(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	GIS mapping / SHELAA	N/A	Development would not have a detrimental impact	Development likely to have a detrimental impact	N/A	Where applicable	Where applicable

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SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
	(8.4) Is the site within a Bat Sustenance Zone	SHELAA	N/A	No	Yes	N/A	N/A	N/A
9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.	(9.1) Might the site have an impact on, or harm the significance of, historical assets	Historical assets are defined as: - Scheduled (Ancient) Monuments - Listed Buildings - Registered (Historic) Parks and Gardens - Conservation Areas - Non-designated assets (such as locally listed)	No harm to the significance of a heritage asset	Mitigation of any potential harm possible.	Some harm to the significance of a heritage asset.	Substantial harm to the significance of a heritage asset.	Where applicable	Where applicable.
	(9.2) Might the site have an impact on an area known for	Site is known for archaeological value / Site lies within Archaeological	N/A	No	Yes	N/A	N/A	N/A

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SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
	its archaeological value.	Notification Area (SHELAA)						
10. To conserve and enhance the quality and local distinctive -	(10.1) Is the site in an area noted for its high sensitivity to change?	Pulborough – Historic Character Assessment Report (2004)	N/A	"Low" sensitivity to change	"High" sensitivity to change	N/A	"Medium" sensitivity to change	Where applicable
ness of landscapes including the South Downs National Park	(10.2) Will any Tree Preservation Orders (TPOs) be affected?	SHELAA GIS layers	No TPO(s) on site	Retainable TPOs on site	TPOs on site	N/A	TPO(s) adjacent to site	Where applicable
	(10.3) Is the site greenfield or brownfield?	SHELAA	Brownfield land	Approximately 50% brownfield / greenfield	Greenfield	N/A	Approximately 75% greenfield/25% brownfield	Where applicable
	(10.4) Is the site within	Current development boundaries and site boundary	Site is within settlement boundary	Site is predominantly within development	Site is outside development boundary and poorly related to	Site is in open countryside / detrimental impact on sensitive	Where applicable	Where applicable

Pulborough Parish Council Neighbourhood Plan



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
	Development Limits?	SHELAA		boundary /Site is outside but adjacent to settlement boundary / Site is relatively well related to existing settlement(s)	the functional settlement	landscapes which cannot be mitigated.		
	(10.5) Landscape capacity assessment	Horsham District Landscape Capacity Assessment 2014	N/A	Moderate/high landscape capacity	No/Low landscape capacity	N/A	Low/moderate landscape capacity	N/A
	(10.6) Is the site within proximity to South Downs National Park?	GIS Mapping / MAGIC map	Where applicable	Outside but not adjacent	Where applicable	N/A	Adjacent / within	Where applicable
11. To achieve sustainable levels of prosperity and economic growth and	(11.1) Is the site proposed for employment development / loss of employment land?	Call-for-Sites information as submitted / SHELAA	N/A	Site is proposed for employment/ Site is proposed for mixed-use development with employment	Proposal will see a loss of identified appropriate employment land	N/A	Where applicable	Other uses

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SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
improve the village's retail function	(11.2) Will there be a loss of employment land (housing allocations)	Call-for-Sites information as submitted / SHELAA	N/A	Site is not currently employment land	Proposal will see a loss of identified appropriate employment land	N/A	Where applicable	Where applicable
	(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	Call-for-Sites information as submitted / SHELAA Aerial mapping	N/A	Employment proposals in rural areas / the countryside (as defined) within or adjacent to existing development boundaries	N/A	N/A	Employment proposals in rural areas / the countryside (as defined) physically separated from existing development boundaries	Where applicable
12. To promote sustainable transport,	(12.1) Accessibility to public transport options	GIS Mapping / SHELAA	Within 800m of multiple public transport hubs	Within 800m of 1 public transport hubs	Over 800m from the nearest public transport hub	N/A	N/A	N/A
walking and cycling uptake and	(12.2) Accessibility issue raised in Site	Site Assessment Report 2019	N/A	No	Yes	N/A	N/A	N/A

Page 45	Pulborough Parish Council Neighbourhood Plan				gic Environmental Asse nmental Report	PLACE SERVICES		
SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect ()	Uncertain / Unknown (?)	Neutral impact (0)
encourage efficient patterns of movement	Assessment Report 2019	(Neighbourhood Plan evidence base document)						



#### 3.6 The Approach to Identifying Effects

The SEA of the Plan within the SEA Environmental Report will assess the document's content against the SEA Objectives and key questions / criteria outlined in the above frameworks. The aim is to assess the sustainability effects of the document following implementation. The assessment will look at the secondary, cumulative, synergistic, short, medium and long-term permanent and temporary effects in accordance with Annex 1 of the SEA Directive, as well as assess alternatives and suggest mitigation measures where appropriate. The findings will be accompanied by an appraisal matrix which will document the effects over time.

The content to be included within the table responds to those 'significant effects' of the policy or element of the Plan subject to assessment. Assessments will also look at the following:

- Temporal effects;
- Secondary, Cumulative and Synergistic effects;
- The assessment of Alternatives; and
- Proposed mitigation measures / recommendations.

These, and 'significant effects' are further described in the following sub-sections.

#### 3.6.1 Description of 'Significant Effects'

The strength of impacts can vary dependant on the relevance of the policy content to certain SEA Objectives or themes. Where the policies have been appraised against the SEA Objectives the basis for making judgements within the assessment is identified within the following key:

Possible impact	Basis for judgement
++	Strong prospect of there being significant positive impacts
+	Strong prospect of there being minor positive impacts
?	Possibility of either positive or negative impacts, or general uncertainty where there is a lack on current information (to be elaborated in commentary in each instance)
0	No impact
	Strong prospect of there being minor negative impacts and mitigation would be possible / issues can be rectified
	Strong prospect of there being significant negative impacts with mitigation unlikely to be possible (pending further investigation) / further work is needed to explore whether issues can be rectified
N/A	Not applicable to the scope or context of the assessed content

Commentary is also included to describe the significant effects of the policy on the sustainability objectives.



#### A NOTE ON 'UNCERTAIN IMPACTS / EFFECTS' IN THE SEA:

Within the following SA Framework for the assessment of site options, a degree of impact is highlighted as 'uncertain'. It should be acknowledged that within the assessment of site options 'uncertain' impacts can 'lean' towards either positive or negative impacts, and these additional degrees of impact will be highlighted within option assessments where relevant.

Additionally, it should also be acknowledged that 'uncertain' impacts will only be highlighted where 'positive' or 'negative' impacts cannot be predicted with any assurance or where there is a lack of reliable quantitative information that can be used to predict impacts (or when the only available information is considered qualitative / anecdotal).

#### 3.6.2 Description of 'Temporal Effects'

The assessment of the Plan's content recognises that impacts may vary over time. Three time periods have been used to reflect this and are shown in the appraisal tables as S (short term), M (medium term) and L (long term). For the purpose of the policy elements of the Plan S, M and L depict:

- (S) Short term: early stages of the plan period
- (M) Medium Term: middle stages of the plan period
- (L) Long term: latter stages of the plan period and where relevant beyond.

#### 3.6.3 Description of 'Secondary, Cumulative and Synergistic Effects'

In addition to those effects that may arise indirectly (secondary effects), relationships between different elements of the Plan will be assessed in order to highlight any possible strengthening or weakening of impacts from their implementation together. Cumulative effects respond to impacts occurring directly from two different elements together, and synergistic effects are those that offer a strengthening or worsening of more than one element of the Plan that is greater than any individual impact. Additionally, any cumulative impacts with other plans or projects will be highlighted within the assessment.

#### 3.6.4 Description of 'Alternatives Considered'

Planning Practice Guidance states that reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

#### 3.6.5 Description of 'Proposed Mitigation Measures / Recommendations'

Negative or uncertain impacts may be highlighted within assessments. As such, mitigation measures may be needed and these will be highlighted in this section for each policy where relevant. In addition to this, this section will also include any recommendations that may maximise sustainability benefits.



# 4. The Assessment of the Plan's Vision & Objectives

#### 4.1 The Plan's Vision & Objectives

#### 4.2.1 Context / Justification

Neighbourhood Plans should set out a positive vision for the future of the area, reflecting the aspirations of the local community, and include agreed priorities to ensure sustainable development.

The Vision and Objectives for the Plan are as follows:

#### Vision 'The vision for Pulborough Parish is to be a balanced living and working community at the heart of rural West Sussex that maximises its location, links and assets to deliver the highest possible quality of life to all its residents whilst supporting a varied, thriving local economy and maintaining the village's role as an important service centre.' **Objectives** To conserve the landscape, scenic beauty and views of the South Downs National Park and other surrounding countryside Environment To conserve the rural character and qualities of the other landscapes of the parish and of the identity of the village To avoid any significant impacts on the Arun Valley Special Area of Conservation or on any other biodiversity assets in the parish To sustain and enhance the character of Listed Buildings and the Conservation Areas To protect and provide additional community facilities to support all age groups and a wider range of parish needs To improve the connectivity within the village so that people can get about safely and pleasantly on foot or by bike/mobility scooter, or by public transport Community To create the feeling of a unified community To increase the capacity of local primary and secondary school places To better manage the effects of car parking and traffic in the village To improve the feeling of safety and wellbeing in the community and to reduce the fear of crime



	-	To retain as far as possible the public houses that remain within the parish
	-	To resist any proposals that will result in the loss of any community facility as designated under Policy 13 unless that loss can be fully justified in the respect that the community benefit is no longer relevant or necessary
	-	To resist any development of any community facility unless that facility is provided in a satisfactory location in advance of any loss
		To reuse brownfield sites and where possible to renovate disused agricultural buildings
New Homes		To meet the needs of local people by building types of homes that have not been a major part of schemes of the last few years - smaller homes for starter homes for younger people and families and downsizing homes for older residents.
New H		To enable older households to downsize to free up mid-size homes occupied by older couples or individuals
	-	To focus small developments in the village, with any larger, high value detached homes (where owners are likely to operate one or more cars) being more suitable to the more rural areas
		To encourage economic development at existing economic areas
ıent		To encourage retail development along Lower Street as the community's preferred retail heart whilst also supporting the other established commercial areas
Employment		To encourage a diversity of business and the creation of a stronger visitor economy
E		To support home-based business to move to first premises through provision of a local business centre in the village
	-	To protect the agriculture and horticultural land from unnecessary loss

#### 4.2.2 Alternatives Considered

The Plan's Vision and Objectives can be seen to generally summarise the content of the Plan. As such, the Vision and Objectives as written have been selected. The individual elements of the Vision and Objectives are elaborated on in more detail within the Plan's policy content. Alternatives are explored in more detail within the sessement of these policies later within this SEA, commensurate to their individual context.

#### 4.2.3 Significant and Temporal Effects

The following assessment explores whether the Plan's Vision and objectives are broadly compatible and seek to aspire to meeting the SEA Objectives that have been specifically devised for the Plan area.



#### Table 6: Compatibility with and adherence to the SEA Objectives: Vision & Objectives

SEA Objectives (SO)	Are the Vision & Objectives compatible with the SEA Objectives?
1. To improve the health of the population overall and reduce health inequalities	✓
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	✓
3. To meet the housing requirements of the whole community	✓
4. To ensure no deterioration of water quality	?
5. To maintain and where possible improve air and noise quality	?
6. To reduce emissions of greenhouse gases from energy consumption	?
7. To reduce vulnerability and increase resilience to extreme weather events and flooding	?
8. To conserve and enhance biodiversity and geodiversity	✓
9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance	✓
10. To conserve and enhance the quality and local distinctiveness of landscapes including the South Downs National Park	✓
11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function	✓
12. To promote sustainable transport, walking any cycling uptake and encourage efficient patterns of movement	✓

The Plan's Vision and Objectives are broadly compatible with the majority of the SEA Objectives that have been identified as relevant to the Plan area. This is particularly true of social and economic objectives.

It could be considered that there are several possible gaps regarding those SEA Objectives related to air and water quality, noise, flood risk and reducing emissions associated with climate change, where these themes are not specifically mentioned within the Vision and Objectives.

The absence of direct mention of these issues is not necessarily a criticism of the Plan in general, where a number of these environmental themes are secondary considerations in a planning context. Detailed policy content exists at the District level to adequately ensure that there is no deterioration of environmental conditions and that any pre-existing issues are not felt by new or existing communities.

This stance is echoed within the Neighbourhood Plan at paragraph 4.4, which states that,



'The Plan deliberately avoids repeating existing national or local planning policies. The proposed policies therefore focus on a relatively small number of key development issues in the area. For all other planning matters, the national and local policies or other planning documents – the National Planning Policy Framework and the HDC Local Plan – will continue to be used.'

#### 4.2.4 Proposed Mitigation Measures / Recommendations

The Plan covers a range of social, economic and, where relevant, environmental themes that are specific to local characteristics and reflect the content of the Plan. No proposed recommendations are made within this SEA Environmental Report.



# 5. The Assessment of the Plan's Land Use Policies

#### 5.1 Policy 1: A Spatial Plan for the Parish

#### 5.1.1 Context / Justification

The Plan states that this policy sets out the established development plan principle of defining a built-up area boundary around the village of Pulborough (including Codmore Hill) to direct housing and other development within the boundary. Only development necessary and especially suited to the countryside will be appropriate beyond the boundary. The hamlets of the parish – Marehill, North Heath and Nutbourne – are not appropriate for any intensification of their existing built areas as they are remote from any local services. Future development at Brinsbury College is already managed in planning policy terms by adopted supplementary planning guidance.

#### 5.1.2 Policy 1: A Spatial Plan for the Parish

The Policy reads as follows:

#### Policy 1: A Spatial Plan for the Parish

The Neighbourhood Plan defines the Built-up Area Boundary of Pulborough, as shown on the Policies Map. Development proposals located inside this boundary will be supported provided they accord with the other provisions of the development plan. Development proposals outside of this boundary will be required to conform to development plan policies in respect of the control of development in the countryside.

#### 5.1.3 Alternatives Considered

#### 5.1.3.1 Identifying alternatives

As part of the process to produce the Pulborough Neighbourhood Plan, a "Call for Sites" exercise was undertaken in which land was submitted for consideration as a potential allocation within the Plan. This process led to the submission of a total of 33 sites for consideration.

These sites were considered through the Pulborough Neighbourhood Plan Site Assessment Report (April 2019), which was undertaken by the Neighbourhood Plan Steering Group with assistance from AECOM on some technical matters. From this process a number of sites were discounted as either having planning permission or being unavailable for development within the Plan period.

This process has been taken forward into this SEA in the identification of notionally reasonable alternatives for exploration under the SEA Regulations. Those sites discounted within the Site Assessment Report have not been considered reasonable within this SEA; instead they have been 'sieved out'. More detail and rationale regarding this process can be found in Section 7 of this report.

Policy 1 of the Plan sets out the Plan's approach of amending the built-up area boundary to accommodate



sites for development that are required to meet local housing needs, as agreed by Horsham District Council and identified within a Housing Needs Assessment also accompanying the Plan.

The boundary defined on the Policies Map accompanying the Plan has amended that shown on the proposed Horsham District Planning Framework Proposals Map to allow for the allocation of land in Policies 2, 3 and 6 of the Neighbourhood Plan. Otherwise, the boundary remains consistent with the Horsham District Planning Framework.

The allocation of land under the abovementioned policies establishes the amendments to the built-up area boundary. To that extent, alternative site allocations would represent those alternative approaches to Policy 1 and the Plan's spatial plan for the Parish.

#### 5.1.3.2Refining alternatives (what is 'reasonable'?)

The Plan allocates a total of 10 sites, for either residential, mixed-use or employment development. Of these, seven are outside the existing built-up area boundary and three are within. Four of the site allocations outside of the existing built-up area boundary are for residential / mixed-use land uses, and the remaining three are for 'rural employment' development which are considered to be suitable for development outside the built-up area boundary as per national policy / guidance.

Sites within the existing built-up area boundary have not been subject to exploration within the context of Policy 1, as they are either allocated already, are small in scale and considered windfall sites, or are otherwise 'sieved out' of the process due to overriding suitably concerns (outlined in Section 7 of this report).

To that extent, alternatives to the Plan's Policy 1 exist in exploring whether those un-allocated 'alternative' sites submitted for consideration outside the built-up area boundary are suitable for allocation in preference to those allocated. For reference, those sites allocated outside the built-up area boundary are found in Policy 2 (a amalgamation of sites PPNP09 and PPNP10 for 170 dwellings), Policy 3 (PPNP11 for 20 dwellings) and Policy 6 (PPNP17 for 26 dwellings).

Of the 33 sites submitted, those that pass the 'sieve' mentioned above are listed below, alongside a range of dwellings that the site could accommodate (landowner submitted yield and a yield calculated at 30 dwellings per hectare):

- Site PPNP01 West Glebe Field (8-46 dwellings)
- Site PPNP18 Coombelands Equestrian Site 1 (45-60 dwellings)
- Site PPNP20 Biarritz (16-31 dwellings)
- Site PPNP21 Minto (6-11 dwellings)
- Site PPNP22 Greendene Nurseries (56-75 dwellings)
- Site PPNP23 Puttocks Farm (218-291 dwellings)
- Site PPNP25 Land North of Broomers Hill Park (60 dwellings)

Having been subject to detailed assessment in Section 7 of this report, these sites can be sieved out further as 'reasonable' alternatives to the strategy of Policy 1. The Site Assessment Report (2019) outlines that the Steering Group dismissed a number of the above sites due to their location to the north of the main village due to access or infrastructure concerns, stating that,

'It has long been the contention that any further development above the roundabout on Codmore Hill is unsustainable.



- The A29 has recently been upgraded to be part of the Major Road Network. This upgrading is the result of studies having been undertaken which have shown that there has been a significant increase in vehicles on this road and it can no longer be classified as a Local Lorry Network route. Pedestrians will therefore be at greater risk from exhaust fumes.
- All the main infrastructure such as schools, primary care, village hall and recreational facilities are located south of the railway bridge.
- Paragraph 3.27 within the Pre-Submission Plan refers to safer crossings needed across the railway. Two new footbridges are proposed.
- The first footbridge is close to the southern side of Pigeon Gate Bridge which carries the A29 across the railway. Section 106 monies have already been set aside to mitigate the dangers to pedestrians on this bridge but as yet no action has been instigated.
- The second footbridge is to enhance Footpath No. 2330 to enable pedestrians from Codmore Hill to avoid walking and cycling beside the busy main road to reach the school and other parts of the village. A bridge over the railway and the replacement of steps up the hillside with a sloping path will be necessary.
- The following 5 sites to the north of the Codmore Hill roundabout (PPNP18; PPNP20; PPNP21; PPNP22 and PPNP23) are considered unsustainable for the reasons given above.'

The above considerations are to an extent replicated within both the detailed findings of the Site Assessment Report (2019) and Section 7 of this SEA. Of these sites a number of further sustainability issues exist that are highlighted below:

- Sites PPNP18, PPNP20, PPNP21, PPNP22, PPNP23 and PPNP25 are all distanced (beyond 800m or a 10-minute walking distance) from healthcare (GP) services. This is contrary to the aims and objectives of the Plan.
- Sites PPNP18, PPNP20, PPNP21, PPNP22, PPNP23 and PPNP25 are all distanced (beyond 800m or a 10-minute walking distance) from a primary school. Site PPNP25 is also beyond this distance from any retail / convenience shopping. This is again contrary to the aims and objectives of the Plan.
- Sites PPNP18, PPNP20, PPNP21, PPNP22 and PPNP23 are all within an area of no-low landscape capacity and otherwise are in landscapes that have are sensitive to development change.
- Sites PPNP18, PPNP20, PPNP21 and PPNP22 all have issues surrounding highways access or traffic implications. Site PPNP23 has negative implications regarding traffic generation.

In consideration of the above, it can be considered that sites PPNP18, PPNP20, PPNP21, PPNP22, PPNP23 and PPNP25 can be ruled out as reasonable alternatives within this Plan both individually and cumulatively. This is particularly the case regarding landscape impacts and traffic generation and access in the broad area; all being in the same broad location of the Plan area to the north of the main village of Pulborough and a range of services and facilities.



A single site remains for exploration as an alternative to the suite of allocations outside the built-up area that area preferred within the Plan. Site PPNP01 lies adjacent to the built-up area boundary and is within close proximity to services and facilities as well as rail links. This site, proposed for 8-46 dwellings could be seen as a direct alternative to site PPNP17, which corresponds to the site with the most sustainability issues surrounding access and landscape allocated within the Plan. Despite this, the land at West Glebe is identified as Local Green Space in the Plan and is within the setting of a Grade I listed church. Furthermore, Policy 11 of the Plan states that 'proposals to extend the graveyard into, and to lay out a new public footpath across, land at West Glebe (PPNP01), as shown on the Policies Map, will be supported, provided they do not harm the openness of the Local Green Space.'

To summarise the above, there are not considered to be any true alternatives to the approach put forward in the Plan under Policy 1 or the suite of sites allocated in the Plan, to meet local housing needs, without having comparatively more significant negative sustainability implications as evidence and this SEA suggest. Although different permutations of sites exist, these would be contrary to the aims and objectives of the Plan to focus development around the Pulborough main village as opposed to Codmore Hill, which has seen multiple permissions in recent times.

#### 5.1.4 Significant, Secondary and Temporal Effects

Assessment of Policy	1											
T 15% (	SEA C	bjective	S									
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	+	+	++	?	?	?	?	?	+	?/-	0	+
Medium Term	+	+	++	?	?	?	?	?	+	?/-	0	+
Long Term	+	+	++	?	?	?	?	?	+	?/-	0	+
CommentaryFrom a notional viewpoint, the Policy reflects a stance that is typical of land use planning in response to objectively assessed housing needs at the District level. In order to meet these needs, the release of greenfield land for development is required. This is in further consideration of the fact that available, suitable and deliverable brownfield land within development boundaries is both diminishing and identified within a Brownfield Land Register at the District level.The Policy identifies that proposals located inside this boundary will be supported provided they accord with the other provisions of the development plan, which ensures a number of positive sustainability effects on all tenets of sustainability, particularly housing growth, the retention of open space (health), accessibility to services (including public transport infrastructure) and the historic environment (in												
	numb	er of po	ed struc blicy the Iready (	mes ar	re not ir	ncluded	within	the Pla	n as Di	istrict a	nd Nati	onal

#### Table 7: Impact on SEA Objectives: Policy 1



uncertain effects highlighted for SEA Objectives 4-8 covering water quality, air and noise, greenhouse gases and flood risk. The spatial element of the Policy is difficult to assess without the use of a number of assumptions regarding the suitability and policy compliance of any development that may come forward. To this extent, the conclusion section of the Report, factoring in cumulative site appraisal work, sets out a position of 'overall Plan effects' that also reflects the spatial element of the Plan.

The Policy also states that development proposals outside of this boundary will be required to conform to development plan policies in respect of the control of development in the countryside. The supporting text of the Policy adds that only development necessary and especially suited to the countryside will be appropriate beyond the boundary. Nevertheless, the Plan allocates a number of sites within the countryside as defined which can be expected to have some degree of negative effect on landscapes in comparison to the current baseline.

## 5.1.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

The supporting text / reasoned justification for the Policy states that,

'At the outset, it was considered that the choices must comprise land immediately adjoining Pulborough built up area boundary but also outside the South Downs National Park and its immediate setting. Further, the land could not be in an area of known flood risk. The potential impact on the Arun Valley Special Protection Area was not a deciding factor as the spatial options are both in similar proximity to the Area. Finally, significant weight has been given to enabling the reuse of brownfield land.

The conclusion is a preferred spatial plan that allows for a small infill development at Highfield located below the development that is currently taking place opposite Sopers Cottages, and for a major new housing development at New Place Farm, off Glebelands. Most of the land at New Place Farm is brownfield and is in close proximity to the major local services, especially the primary school, medical centre and a major supermarket. The potential of future growth at Codmore Hill, though discounted in this PPNP, will be assessed in a review alongside other spatial options.'

Those options dismissed in the 'Alternatives Considered' section of this Report (5.1.3) outlines that a focus of development to the north at Codmore Hill would result in a number of sustainability concerns and are not being considered within the focus of this Plan. The allocations of the Plan outside the built-up area boundary are broadly focused around the Pulborough village area, in close proximity to existing services and facilities, which reflects the fact that multiple permissions have been granted in the northern built-up area boundary at Codmore Hill. In regards to what the Plan is focussed on achieving, the strategy put forward within the Plan represents the most appropriate strategy for the Plan area.

#### 5.1.6 Proposed Mitigation Measures / Recommendations

No recommendations are made for this Policy.



## 5.2 Policy 2: Land at New Place Farm, Pulborough – New Place Nurseries and Land adjacent to Drovers Lane

#### 5.2.1 Context / Justification

#### The Plan states that,

'This policy allocates New Place Farm Nursery located on the northern edge of Pulborough village and the land immediately to the south of the nursery, for a housing scheme that may comprise 174 homes. The land is available for development and the landowner has indicated an approval in principle to the provisions of this policy.

The development principles in the policy are intended to deliver a successful housing scheme that not only blends well with the existing housing, landscape and local roads but also makes a proper contribution to improving local community infrastructure. Crucially, this scale of housing development (and that of Policy 3) can just about be accommodated in the capacity of the nearby primary school. In addition, its close proximity to the Recreation Ground means it is more beneficial for the scheme to contribute to its facilities rather than to create another public open space.'

### 5.2.2 Policy 2: Land at New Place Farm, Pulborough – New Place Nurseries and Land adjacent to Drovers Lane (PPNP09 & PPNP10)

#### The Policy reads as follows:

Policy 2: Land at New Place Farm, Pulborough – New Place Nurseries and Land adjacent to Drovers Lane (PPNP09 & PPNP10)

The Pulborough Neighbourhood Plan supports the development of the site known as Land at New Place Farm, Pulborough (5.8 Ha) as shown on the Policies Map for approximately 170 dwellings. Any proposal must be delivered in accordance with the following principles:

- i. Any proposal must include a landscape-led masterplan for which there should be consideration of the following criteria:
  - a) A thorough understanding of the wider landscape impact of any proposal is demonstrated as well as considering all the elements which contribute to the character of the site. Regard should be given to visibility and key views. These should inform design and layout of the site;
  - b) Where appropriate existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition from urban to rural and help to minimise the visual impact of the proposal.
- ii. Any proposal will deliver predominantly 2 and 3 bed dwellings to meet local need. The layout and location of this housing will be outlined in the masterplan and should be of an appropriate scale and



massing in keeping with the character of the surroundings. Regard should be given to the Pulborough Design Statement;

- iii. Any proposal will deliver affordable homes in accordance with identified need and the policies in the development plan;
- iv. Primary access into the site will be delivered off Glebelands;
- v. A comprehensive transport assessment must be submitted with the application. Any reasonable mitigation to make the development proposal acceptable in planning terms must be implemented in full;
- vi. A full ecological and biodiversity survey of the site is submitted as part of the application. Any reasonable mitigation proposed by the surveys must be implemented in full;
- vii. A contamination assessment of the site is submitted as part of the application. Any reasonable mitigation proposed by the assessment must be implemented in full;
- viii. Support is given to the provision of Sustainable Drainage (SuDs) and green infrastructure with the opportunity to create and enhance local habitats and bring about a net increase in biodiversity;
- ix. Appropriate contributions to local community facilities is made to make the proposal acceptable in planning terms;
- x. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park;
- xi. A countryside park is provided on the northern half of the site in accordance with the Policy Map.
- xii. Part of the intended site covers the Large Roman Settlement Archaeological Notification Area. Assessing any potential deposits should be part of any archaeological survey.
- xiii. Any development should be sympathetic to existing listed buildings adjacent to the site.

#### 5.2.3 Alternatives Considered

Alternative sites are explored in Section 7 of this Report.

#### 5.2.4 Significant, Secondary and Temporal Effects

The 'policy-off' assessment of this site in Section 7 of this Report identifies the following potential negative effects that should ideally be addressed through site policy.

Uncertain	Negative	Significant negative
Parts of PPNP09/10 are within 800	Site PPNP09 includes a water body,	No significant negative effects
metres from a supermarket, however	and those options that include	highlighted
	PPNP09 have been identified as	



distance is not currently available.eDistance to main employment areaRAs identified within the West SussexPMinerals Local Plan, the site is locatedidwithin the Minerals Safeguarding AreaP	having the potential for negative effects on water quality as a result. Rail noise has been identified on site PPNP09 at 55-64.9 decibels. Additionally, site PPNP09 has been	
As identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Area	PPNP09 at 55-64.9 decibels.	
Stone.' The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site Site PPNP09 surrounds the Grade II* listed New Place Manor, and also the Grade II listed Archway and Garden Wall and New Place Manor to the South East of the House The sites are within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). T	identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the west. Site PPN10 similarly does not contain any areas of surface water flood risk (very low). Site PPNP09 however contains areas of high and medium surface water flood risk towards the site's western boundary and in the north of the site The sites are partly located in an area with the potential for archaeological deposits associated with a Large Roman Settlement Archaeological Notification Area. The most western part of site PPNP09 is within an area identified as having no-low capacity within the Landscape Capacity Assessment. Site PPNP10 is entirely within an area identified as having low-moderate capacity. Site PPNP09 has issues surrounding access to the existing road network, as identified within the Site	

The effects of the Policy, in its ability to ensure that the above potential negative effects can be overcome, or positive effects maximised, are outlined below. This represents a 'policy-on' assessment.



#### Table 8: Impact on SEA Objectives: Policy 2

Assessment of Policy 2												
	SEA C	bjective	S									
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	+	?	++	0	?	0	+	0	0	+	0	+
Medium Term	+	?	++	0	?	0	+	0	0	+	0	+
Long Term	+	?	++	0	?	0	+	0	0	+	0	+

Commentary

The 'policy-off' site assessment for this site has not identified any significant negative effects on any of the SEA Objectives, indicating that there are no overriding barriers to development of the site. Of the potential negative effects identified through that assessment; namely surface water flood risk, landscape and access; the Policy successfully seeks to ensure that any forthcoming application addresses these issues. The Policy ensures that SuDS will be supported to deliver net gains in biodiversity, that access should be off Glebelands and applications subject to a Transport Assessment and future development be subject to a masterplan, landscape-led, process. Additionally, regarding landscape, the assessment of the site in Section 7 of this Report identified the western part of the site as having no-low landscape capacity. The Policy in responding to this constraint identifies this land as being set aside for a countryside park, as identified within the Policy and the Proposals Map. This also addresses issues surrounding water quality and the presence of a water body in this area of the site.

The Policy also successfully address potential issues surrounding archaeology in light of the presence of a Large Roman Settlement Archaeological Notification Area and also existing listed buildings adjacent to the site. Regarding rail and road noise, it is considered that any future masterplan can address these potential issues. This could be in the form of buffers or stand-off areas.

The latest iteration of the Policy has acted upon previous SEA recommendations that the Policy be expanded to cover issues surrounding the implications of the site being in the 'Zone of Influence' of the Arun Valley SPA and Ramsar. The HRA / AA undertaken for the Plan included the original policy recommendations in this regard.

The Policy in itself will have positive effects on a range of social objectives not covered within the site assessment of Section 7. These include the contribution the site makes to meeting local housing needs and health (through the park and open space / landscaping requirements). Other themes of sustainability are covered within the Policy and positive effects are highlighted in the above.



## 5.2.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

#### Please see Section 7.3 of this Report.

#### 5.2.6 Proposed Mitigation Measures / Recommendations

A previous iteration of the SEA recommended that criteria be introduced into the policy that address the potential for archaeological deposits associated with a Large Roman Settlement Archaeological Notification Area. Previous recommendations also concerned a need to address the fact that the site is located within very close proximity to several listed buildings in the north. The latest version of the Neighbourhood Plan successfully factors in these recommendations, and as such no recommendations are made currently in regard to these potential issues.

The latest iteration of the Policy has acted upon previous SEA recommendations that the Policy be expanded to cover issues surrounding the implications of the site being in the 'Zone of Influence' of the Arun Valley SPA and Ramsar. The HRA / AA undertaken for the Plan included the original policy recommendations in this regard.

#### 5.3 Policy 3: Land off Glebelands, Pulborough

#### 5.3.1 Context / Justification

The Plan states that,

'This policy allocates land immediately to the south of New Place Farm for a housing development scheme that may comprise 20 dwellings intended as affordable homes for local people in perpetuity and as self-build homes. The land has been made available for this purpose by the landowner.

The land creates the opportunity to establish a Community Land Trust scheme to deliver a mix of self-build and affordable homes (to be retained in perpetuity for local people). A Trust has recently been formed and is expected to bring forward a scheme as a normal planning application for this land in due course.'

#### 5.3.2 Policy 3: Land off Glebelands, Pulborough

The Policy reads as follows:

Policy 3: Land off Glebelands, Pulborough

The Pulborough Neighbourhood Plan supports the development of the site known as Land at Glebelands, Pulborough (0.8 Ha) as shown on the Policies Map for approximately 20 dwellings. Any proposal must be delivered in accordance with the following principles:

i. The site will come forward as a Community Land Trust proposal and will deliver affordable housing,



#### and may provide opportunities for self-build;

- ii. Affordable housing provision will be made available to qualifying households with a local connection and should be in conformity with the district's housing policy;
- iii. Primary access will be delivered off Glebelands;
- iv. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park;
- v. Where appropriate existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition/buffers from urban to rural and help to minimise the visual impact of the proposal; and
- vi. Regard should be given to visibility and key views. These should inform design and layout of the site.
- vii. Part of the intended site covers the Large Roman Settlement Archaeological Notification Area. Assessing any potential deposits should be part of any archaeological survey.

#### 5.3.3 Alternatives Considered

Alternative sites are explored in Section 7 of this Report.

#### 5.3.4 Significant, Secondary and Temporal Effects

The 'policy-off' assessment of this site in Section 7 of this Report identifies the following potential negative effects that should ideally be addressed through site policy.

Uncertain	Negative	Significant negative
The site is located within the Minerals Safeguarding Area (including a 250m buffer) for 'Building Stone.' The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site. The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). The site is entirely within an area identified as having low-moderate	The site is over 1,500 metres from a main employment area. The site is located in an area with the potential for archaeological deposits associated with a Large Roman Settlement Archaeological Notification Area. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).	No significant negative effects highlighted
capacity.		

The effects of the Policy, in its ability to ensure that the above negative effects can be overcome, or positive



#### effects maximised, are outlined below. This represents a 'policy-on' assessment.

#### Table 9: Impact on SEA Objectives: Policy 3

regard.

Assessment of Policy 3														
Assessment of Policy 3	SEA Objectives													
Temporal Effects	SEA C	bjective	S											
	1	2	3	4	5	6	7	8	9	10	11	12		
Short Term	0	?	+	0	0	0	0	0	0	+	0	0		
Medium Term	0	?	+	0	0	0	0	0	0	+	0	0		
Long Term	0	?	+	0	0	0	0	0	0	+	0	0		
Commentary	poten	The assessment of the site in Section 7 of this Report identifies that there are no potential significant effects and no resultant overriding barriers to the development of the site.												
	The assessment in Section 7 did however identify several potential negative effects regarding archaeology, access and the site's distance to a main employment area. Of these potential effects, the latter is not something that can be mitigated or addressed within Policy. The Policy does address the potential for archaeological deposits associated with a Large Roman Settlement Archaeological Notification Area acting on a previous recommended that criteria are introduced into the policy that address this potential.													
	applic staten	Potential access issues identified are in some way nullified through the planning application process and the statutory requirements for a Design and Access statement, and the Policy identifies that access could be achieved off Glebelands; nevertheless, uncertain effects are identified at this stage.												
	other IRZ of 'mode an are addre transit	The Section 7 assessment highlighted uncertainties surrounding a number of other factors on site. These addressed the fact that the site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site; the site is within an area of 'moderate' sensitivity to change (development); and that the site is entirely within an area identified as having low-moderate capacity. Of these, the Policy addresses landscape concerns through appropriate and effective soft scape/green transition/buffers, and regard to visibility and key views. This will ensure positive												
	outcomes. The latest iteration of the Policy has acted upon previous SEA recommendations that the Policy be expanded to cover issues surrounding the implications of the site being in the 'Zone of Influence' of the Arun Valley SPA and Ramsar. The HRA / AA undertaken for the Plan included the original policy recommendations in this										he HRA			



### 5.3.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

#### Please see Section 7.3 of this Report.

#### 5.3.6 Proposed Mitigation Measures / Recommendations

A previous iteration of the SEA recommended that, as the then Policy did not address the potential for archaeological deposits associated with a Large Roman Settlement Archaeological Notification Area, that criteria be introduced into the policy that address this potential. This has since been integrated within the Policy and no further recommendations regarding the historic environment are made at this stage.

The latest iteration of the Policy has acted upon previous SEA recommendations that the Policy be expanded to cover issues surrounding the implications of the site being in the 'Zone of Influence' of the Arun Valley SPA and Ramsar. The HRA / AA undertaken for the Plan included the original policy recommendations in this regard..

#### 5.4 Policy 4: Land off Station Approach, Pulborough

#### 5.4.1 Context / Justification

#### The Plan states that,

'A large part of the site is currently held under a lease which does not expire until 2021, and that may well be extended for a further six years.

Change of use from commercial to mixed use will relate better to the surrounding residential properties.'

#### 5.4.2 Policy 4: Land off Station Approach, Pulborough

The Policy reads as follows:

#### Policy 4: Land off Station Approach, Pulborough

The Pulborough Neighbourhood Plan supports the development of the site known as Land off Station Approach, Pulborough (0.3 Ha) as shown on the Policies Map for approximately 18 dwellings. Any proposal must be delivered in accordance with the following principles:

- i. The proposal should come forward as a mixed-use development comprising of retail and office uses (A1, A2 and B1) primarily on the ground floor with residential development on the upper floors;
- ii. The proposal should come forward with no net loss of employment floorspace unless it can be demonstrated further employment is not viable on this site supported by robust evidence and an appropriate marketing campaign;



- iii. Any proposal should be sympathetic to local character. Particular regard should be given to design, height, massing and use of materials appropriate to the local context; and
- iv. Appropriate parking provision is provided to support the development.
- v. Part of the intended site covers the Large Roman Settlement Archaeological Notification Area. Assessing any potential deposits should be part of any archaeological survey.

#### 5.4.3 Alternatives Considered

Alternative sites are explored in Section 7 of this Report.

#### 5.4.4 Significant, Secondary and Temporal Effects

The 'policy-off' assessment of this site in Section 7 of this Report identifies the following potential negative effects that should ideally be addressed through site policy.

Uncertain	Negative	Significant negative
There is the potential for contamination on site due to the site's previous land use.	The site is within a Bat Sustenance Zone.	No significant negative effects highlighted
The site is between 50 – 100 metres from a river to the south.		
The site is within groundwater Source Protection Zone 'Zone III – Total Catchment.' This is the area around a supply source within which all the groundwater ends up at the abstraction point and is the point from where the water is taken.		
The site is within an area that experiences rail noise at between 55- 64.9 decibels due to the presence of the railway line to the west of the site.		
The site is currently employment land, and is proposed for mixed use development. At present, it is uncertain whether the proposal would lead to a net loss of employment land overall.		

Strategic Environmental Assessment: Environmental Report



The Site Assessment Report has identified a potential issue surrounding traffic / accessibility.

The effects of the Policy, in its ability to ensure that the above potential negative effects can be overcome, or positive effects maximised, are outlined below. This represents a 'policy-on' assessment.



Assessment of Policy 4												
	SEA C	bjective	S									
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	0	?	+	?	0	0	0	?	0	+	+	0
Medium Term	0	?	+	?	0	0	0	?	0	+	+	0
Long Term	0	?	+	?	0	0	0	?	0	+	+	0
Commentary	poten	The assessment of the site in Section 7 of this Report identifies that there are no potential significant effects and no resultant overriding barriers to the development of the site.										
	regare surrou requir shape	The assessment of Section 7 does however identify potential negative effects regarding the fact that the site is within a Bat Sustenance Zone. The issue surrounding the Bat Sustenance Zone is also covered by District level policy requirements which would also apply on site and can not be expected to affect or shape any future scheme on the site. Nevertheless, uncertain effects are identified.										
	Identified. Of the uncertain effects identified within Section 7, a number of these are not covered by the site Policy. These include the potential for contamination on site due to the site's previous land use and traffic / accessibility. It is recommended that Policy criteria are included that address all of these issues, requiring further evidence to support any forthcoming planning application. Effects regarding rail noise have been identified cautiously, yet it is acknowledged that other factors such as building materials and topography are likely to address these issues outside of the Plan's influence. Uncertain effects regarding the site's distance to a river to the south are unlikely to require any mitigation due to topography; the site being approximately nine metres higher than the river.											
	regaro overa come demo	ding the II. This forware nstrate	e wheth is addro d with n d furthe	er a pro essed v lo net lo er emplo	oposal vithin th oss of e oyment	entified would le ne Polic mployn is not v eting ca	ead to a y, that s nent flo viable o	a net los states t orspace n this s	ss of er hat the e unles ite sup	mploym propos s it can ported	ient lan sal shoi be by robu	uld ist



and is consistent with District level policy. Further positive effects can be expected regarding townscape and the Policy's requirement that particular regard should be given to design, height, massing and use of materials appropriate to the local context.

## 5.4.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

Please see Section 7.3 of this Report.

#### 5.4.6 Proposed Mitigation Measures / Recommendations

Of the uncertain effects identified within Section 7, a number of these are not covered by the site Policy. These include the potential for contamination on site due to the site's previous land use and traffic / accessibility. It is recommended that Policy criteria are included that address these issues, requiring further evidence to support any forthcoming planning application.

## 5.5 Policy 5a: Harwoods Garage, Pulborough, on eastern side ofA29

#### 5.5.1 Context / Justification

#### The Plan states that,

'The Household Survey indicated a strong desire for additional childcare facilities and support would be given to proposals to provide such facilities within the development.

Recent housing developments local to this site have highlighted the need to provide public/community services and support would be given to commercial enterprises of this nature within the site.'

#### 5.5.2 Policy 5a: Harwoods Garage, Pulborough, on eastern side of A29

#### The Policy reads as follows:

#### Policy 5a: Harwoods Garage, Pulborough, on eastern side of A29

The Pulborough Neighbourhood Plan supports the development of the site known as Land at former Harwoods Garage, Pulborough, as shown on the Policies Map for approximately 15 dwellings. Any proposal must be delivered in accordance with the following principles:

i. The proposal should come forward as a mixed-use development and support is given to the following uses of retail, commercial or community and residential development. If employment generating uses are no longer viable on the site it must be robustly demonstrated through an agreed



comprehensive viability and marketing strategy or it can be demonstrated commercial uses on this site are relocated elsewhere in the district with no net loss of commercial floorspace.

- ii. Any proposal should be sympathetic to local character. Particular regard should be given to design, height, massing and use of materials appropriate to the local context;
- ii. A comprehensive environmental assessment must be submitted with the application. Any reasonable mitigation to make the development proposal acceptable in planning terms must be implemented in full;
- iv. Safe access and safe parking is provided on site;
- v. Any proposal should safeguard protection for Tree Preservation Orders and appropriate mitigation is applied.

#### 5.5.3 Alternatives Considered

During the plan-making process, a previous iteration of the Policy allowed the possibility of a loss of employment uses on site without the need for a marketing exercise. An early iteration of the SEA assessed the current Policy approach as an alternative and recommended that the alternative approach 'Requiring no net loss of employment floorspace unless it can be demonstrated further employment is not viable on this site supported by robust evidence and an appropriate marketing campaign' become the preferred Policy approach.

This recommendation has been taken onboard by the plan-makers, as reflected in the wording of the Policy. Consideration of the Plan's previous stance is now considered a reasonable alternative approach, and its assessment can be found below for transparency purposes. At this stage, the alternative is:

• Alternative 5a(1) – Allowing the possibility of a net loss of employment floorspace without the need for demonstrable evidence of an appropriate viability and marketing strategy.

#### 5.5.4 Significant, Secondary and Temporal Effects

The 'policy-off' assessment of this site in Section 7 of this Report identifies the following potential negative effects that should ideally be addressed through site policy.

Uncertain	Negative	Significant negative
There is the potential for contamination on site due to the site's previous land use. The site is currently employment land and is proposed for mixed use development. At present, it is uncertain whether the proposal would lead to a net loss of employment land overall.	The site is within 50 metres / adjacent to a small water body. The site has been identified as experiencing road traffic noise at 65- 69.9 decibels associated with the A29 to the west. An area of high risk exists regarding surface water flooding exists within the northern half of the site.	No significant negative effects highlighted



The site is within a Bat Sustenance Zone. The site is within a large Tree Preservation Area.

The effects of the Policy, in its ability to ensure that the above negative effects can be overcome, or positive effects maximised, are outlined below. This represents a 'policy-on' assessment.

#### Table 11: Impact on SEA Objectives: Policy 5a

Assessment of Policy 5	а											
	SEA C	SEA Objectives										
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	0	+	?	?	?	0	?	?	0	+	+	0
Medium Term	0	+	?	?	?	0	?	?	0	+	+	0
Long Term	0	+	?	?	?	0	?	?	0	+	+	0
Assessment of Alternative 5a(1)												
	SEA C	SEA Objectives										
		-	0									
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	1 0	2 +		4 ?	5 ?	6 0	7 ?	8 ?	9 0	10 +	11	12 0
			3								11	
Short Term	0	+	3 +	?	?	0	?	?	0	+	11	0

potential significant effects and no resultant overriding barriers to the development of the site.

This appraisal explores the implications of the Policy as worded, and an alternative that would allow a net loss of employment unless robust evidence and a suitable marketing exercise demonstrates otherwise. In terms of sustainability, any loss of employment land for residential purposes can be considered negative. In planning terms, evidence to suggest a change of use that does not fall under permitted development is crucial to determine an application. In this regard, there will be comparatively more positive effects on SEA Objective 11 (economic factors) through the preferred approach than that of the alternative, without concerning viability. This comparative assessment has been undertaken on the basis that there will be a 'trade-off' between residential and employment uses on



site to strike a balance that is viable. Therefore, the Policy alternative 5a(1) as worded will have negative implications on employment, and positive effects regarding housing. The Policy itself will have positive effects on employment, however uncertain effects on housing as a result of viability, but on the basis that some residential development can be expected to come forward. It should be noted that were a scheme put forward that to be viable would not meet District level policy requirements in terms of marketing exercise and sufficient evidence, then that application would likely not be permitted.

Within the Section 7 assessment of the site, the potential for negative effects have been highlighted regarding the site's distance to a small water body; road traffic noise associated with the A29 to the west; an area of high surface water risk within the northern half of the site; and the site being within a Bat Sustenance Zone. Of these potential effects, the Policy addresses water concerns through the requirement for an environmental assessment. This can also be expected to address the contamination issues for which there is current uncertainty. The implications of the Bat Sustenance Zone will be addressed through District level policy requirements. Issues surrounding surface water flood risk should however be addressed in the Policy in so far as they can shape the design of any scheme and are therefore relevant to other Policy 5a criteria. It is recommended that Policy criteria are included that address these issues, requiring further evidence to support any forthcoming planning application, including the requirement for SuDS. Effects regarding road traffic noise have been identified cautiously, yet it is acknowledged that other factors such as building materials and topography are likely to address these issues outside of the Plan's influence.

The site is also within a large Tree Preservation Area. The Policy however addresses these concerns through requiring that any proposal should safeguard protection for Tree Preservation Orders and appropriate mitigation is applied. This ensures positive outcomes regarding landscape features. Other positive outcomes can be expected regarding safe access.

## 5.5.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

Please see Section 7.3 of this Report.

#### 5.5.6 Proposed Mitigation Measures / Recommendations

During the plan-making process, a previous iteration of the Policy allowed the possibility of a loss of employment uses on site without the need for a marketing exercise. An early iteration of the SEA assessed the current Policy approach as an alternative and recommended that the alternative approach 'Requiring no net loss of employment floorspace unless it can be demonstrated further employment is not viable on this site supported by robust evidence and an appropriate marketing campaign' become the preferred Policy approach for those reasons contained above in the comparative assessment of the options. This recommendation has been taken onboard by the plan-makers, as reflected in the wording of the Policy.



Issues surrounding surface water flood risk should however be addressed in the Policy in so far as they can shape the design of any scheme and are therefore relevant to other Policy 5a criteria. It is recommended that Policy criteria are included that address these issues, requiring further evidence to support any forthcoming planning application, including the requirement for SuDS.

## 5.6 Policy 5b: Harwoods Car Park, Pulborough, on western side ofA29

#### 5.6.1 Context / Justification

#### The Plan states that,

'The Household Survey indicated a strong desire for additional childcare facilities and support would be given to proposals to provide such facilities within the development.

Recent housing developments local to this site have highlighted the need to provide public/community services and support would be given to commercial enterprises of this nature within the site.'

#### 5.6.2 Policy 5b: Harwoods Car Park, Pulborough, on western side of A29

#### The Policy reads as follows:

#### Policy 5b: Harwoods Car Park, Pulborough, on western side of A29

The Pulborough Neighbourhood Plan supports the development of the site known as Harwoods Car Park as shown on the Policies Map for approximately 9 dwellings. Any proposal must be delivered in accordance with the following principles:

- i. Any proposal should be sympathetic to local character. Particular regard should be given to design, height and massing and the use of materials appropriate to the local context;
- ii. Any proposal should safeguard protection for Tree Preservation areas and appropriate mitigation applied;
- iii. Safe access and safe parking are provided on site.

#### 5.6.3 Alternatives Considered

Alternative sites are explored in Section 7 of this Report.

#### 5.6.4 Significant, Secondary and Temporal Effects

The 'policy-off' assessment of this site in Section 7 of this Report identifies the following potential negative



#### effects that should ideally be addressed through site policy.

Uncertain	Negative	Significant negative
The site is between 50 – 100 metres from a small water body. Several trees with Tree Preservation Orders exist on the site, however their retention may be possible as part of any forthcoming scheme.	Rail noise has been identified on the site at 55-64.9 decibels. Additionally, the site has been identified as experiencing road traffic noise at 65- 69.9 decibels associated with the A29 to the east. The site is within a Bat Sustenance Zone.	No significant negative effects highlighted

The effects of the Policy, in its ability to ensure that the above potential negative effects can be overcome, or positive effects maximised, are outlined below. This represents a 'policy-on' assessment.

#### Table 12: Impact on SEA Objectives: Policy 5b

Assessment of Policy 5b												
T 15% .	SEA C	bjective	S									
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	0	0	+	?	?	0	0	?	0	+	0	0
Medium Term	0	0	+	?	?	0	0	?	0	+	0	0
Long Term	0	0	+	?	?	0	0	?	0	+	0	0

Commentary

The assessment of the site in Section 7 of this Report identifies that there are no potential significant effects and no resultant overriding barriers to the development of the site.

The assessment of the site within Section 7 did however raise potential negative effects associated with rail noise and road traffic noise and the fact that the site is within a Bat Sustenance Zone. This latter issue will be addressed through District level policy requirements however issues surrounding road traffic noise should be addressed in the Policy in so far as they can shape the design of any scheme and are therefore relevant to other Policy 5b criteria. It is recommended that Policy criteria are included that address this issue. Effects regarding rail and road traffic noise have been identified cautiously, yet it is acknowledged that other factors such as building materials and topography are likely to address these issues outside of the Plan's influence.

Uncertain effects were also raised in Section 7 regarding the site's distance to a small water body and also the presence of several trees with Tree Preservation Orders on site. The Policy addresses this latter issue through requiring that any



proposal should safeguard protection for Tree Preservation areas and appropriate mitigation applied. The Policy however could seek further information at the planning application stage to address any water quality concerns surrounding the water body.

# 5.6.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

Please see Section 7.3 of this Report.

#### 5.6.6 Proposed Mitigation Measures / Recommendations

The Policy could seek further information at the planning application stage to address any water quality concerns surrounding the water body a short distance from the site.

### 5.7 Policy 6: Land at Highfields

#### 5.7.1 Context / Justification

#### The Plan states that,

'This policy allocates land immediately to the south of the current housing development known as Brookfields. This land is available, developable and deliverable.

The development affords a natural infill on the western side of Sopers Hill and is in close proximity to much of the existing recreational and community facilities.'

#### 5.7.2 Policy 6: Land at Highfields

The Policy reads as follows:

#### Policy 6: Land at Highfields

The Pulborough Neighbourhood Plan supports the site known as Land at Highfields, Pulborough (0.98 Ha) as shown on the Policies Map for approximately 26 houses. Any proposal must be delivered in accordance with the following principles:

- i. A traffic management scheme is submitted which will indicate that access on to the site is via the new development at Brookfields; not directly on to the A29;
- ii. The site is within an Archaeological Notification Area (ANA). An archaeological assessment would be required, and the appropriate mitigation carried out;
- iii. Any proposal will deliver affordable housing in accordance with identified need and the policies within the Neighbourhood Plan.



#### 5.7.3 Alternatives Considered

#### Alternative sites are explored in Section 7 of this Report.

### 5.7.4 Significant, Secondary and Temporal Effects

The 'policy-off' assessment of this site in Section 7 of this Report identifies the following potential negative effects that should ideally be addressed through site policy.

Uncertain	Negative	Significant negative
The site is between 50 – 100 metres from a small water body.	The site is over 1,500 metres from a main employment area.	No significant negative effects highlighted
As identified within the West Sussex Joint Minerals Local Plan, the site is located within the Minerals Safeguarding Area (including a 250m buffer) for 'Building Stone.' The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003).	The site has been identified as experiencing road traffic noise at 65- 69.9 decibels associated with the A29 to the east. The site is located within an area identified as having potential archaeological deposits associated with Stane Street Roman Road Archaeological Notification Area. The site is entirely within an area identified as having no-low capacity as identified within the Landscape Character Assessment. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).	

The effects of the Policy, in its ability to ensure that the above negative effects can be overcome, or positive effects maximised, are outlined below. This represents a 'policy-on' assessment.

Assessment of Policy 6

Table 13: Impact on SEA Objectives: Policy 6

Assessment of Policy 6													
Temporal Effects	SEA Objectives												
	1	2	3	4	5	6	7	8	9	10	11	12	
Short Term	0	+	+	?	?	0	0	0	+	?	0	0	
Medium Term	0	+	+	?	?	0	0	0	+	?	0	0	

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Long Term	0	+	+	?	?	0	0	0	+	?	0	0			
Commentary	poten of the	The assessment of the site in Section 7 of this Report identifies that there are no potential significant effects and no resultant overriding barriers to the development of the site. Positive effects will be realised in regard to the Policy's contribution in meeting local housing needs.													
	the sir the A: Of the the Pe if nec to the This w be ad area of asses caution topog Of the small addre	- · ·													

# 5.7.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

Please see Section 7.3 of this Report.

#### 5.7.6 Proposed Mitigation Measures / Recommendations

Issues surrounding landscape should be addressed within the Policy through suitable policy criteria (the site is also in an area of moderate sensitivity to change) and the requirement for suitable assessment respectively.

A small water body exists 50-100m from the site. The implications of this should be addressed at the planning application stage and a criterion for further assessment could be incorporated into the Policy.

# 5.8 Policy 7: Broomers Hill Industrial Estate, Codmore Hill

#### 5.8.1 Context / Justification

The Plan states that,



'This policy allocates land to encourage new employment development at the most appropriate location in the parish. The site adjoins an existing business area on the edge of Codmore Hill and can be accessed from the A29. The built-up area boundary at Codmore Hill has been redefined in Policy 1 to make provision for this allocation which closes the gap between the existing built-up area and the Broomers Hill Industrial Estate. However, that change has been made only for the purpose of this allocation. Should a business scheme not be implemented then the land will be safeguarded from any other form of development pending a future review of the PPNP or another development plan document.

Research shows that a large number of home-based businesses locally do not expand into commercial premises or take on employees because of the cost/risk. The policy is especially encouraging of the provision of business units for this specific purpose. This new allocation will significantly increase the total area of business land in the village to provide local jobs, which will help reduce the high levels of out-commuting.'

### 5.8.2 Policy 7: Broomers Hill Industrial Estate, Codmore Hill

The Policy reads as follows:

#### Policy 7: Broomers Hill Industrial Estate, Codmore Hill

Pulborough Neighbourhood Plan allocates commercial uses at Land South of Broomers Hill Industrial Estate as shown on the Policies Map (3 Ha) for commercial uses only. Support is given to any proposal subject to the following criterion are met:

- i. Support is given to the development of commercial uses at Land South of Broomers Hill. Particular support is given to providing premises for start-up and expanding commercial uses;
- ii. Safe access is achieved off the A29;
- iii. Appropriate provision for non-vehicular modes of transport is made to improve connectivity from the site back into the village of Pulborough. Support would be given to the creation of a footpath/cycle way to link Broomers Hill at a point adjacent to the industrial site, following the western side of the railway line down to meet the existing footpath at River View (Path No. 2330);
- iv. Where appropriate existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition from proposed development to the wider open countryside and help to minimise the visual impact of the proposal;
- v. A full ecological and biodiversity survey of the site is submitted as part of any application. Any recommendations arising from the assessment or study in order to make the development acceptable in planning terms must be implemented;
- vi. Any proposal should look to meet and implement the highest energy efficiency standards for commercial buildings;
- vii. Any proposal should demonstrate it is appropriate to the local context. Particular regard should be



given to design, height, massing and use of materials appropriate to the local context; and

- viii. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park.
- ix. Any development should be sympathetic to existing listed buildings adjacent to the site.

#### 5.8.3 Alternatives Considered

Alternative sites are explored in Section 7 of this Report.

#### 5.8.4 Significant, Secondary and Temporal Effects

The 'policy-off' assessment of this site in Section 7 of this Report identifies the following potential negative effects that should ideally be addressed through site policy.

Uncertain	Negative	Significant negative
The site is in close proximity to the Grade II listed Forge Cottage and The Old Forge to the south west. The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003).	The site is within 50 metres / adjacent to a small water body. Rail noise has been identified on the site at 55-64.9 decibels. Additionally, the site has been identified as experiencing road traffic noise at 65- 69.9 decibels associated with the A29 to the west An area of land in the northern part of the site that is of a high risk of surface water flooding. Additionally, the majority of the site is identified as being at a medium risk of surface water flooding. The site is mostly within an area	No significant negative effects highlighted
	The site is mostly within an area identified as having no-low capacity as identified within the Landscape Character Assessment, with a small area of the site at the northern boundary being within an area of low- moderate capacity.	

The effects of the Policy, in its ability to ensure that the above potential negative effects can be overcome, or positive effects maximised, are outlined below. This represents a 'policy-on' assessment.



Pulborough Parish Council

Neighbourhood Plan

Assessment of Policy 7													
-	SEA Objectives												
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12	
Short Term	0	+	0	?	0	+	?	0	0	+	+	0	
Medium Term	0	+	0	?	0	+	?	0	0	+	+	0	
Long Term	0	+	0	?	0	+	?	0	0	+	+	0	
Commentary											oment also lated face re vside urface		
	these		at the p								ng both If SuDS		
	The Section 7 assessment identified the potential for rail and road traffic noise site, however it is not felt that these effects would be realised in a problematic in consideration of the site's intended commercial use. No effects have been identified as a result. This is also the case regarding the historic environment although the site is in close proximity to the Grade II listed Forge Cottage and Old Forge to the south west, Policy criterion ix effectively ensures that propos take this into account. Additionally, policies at the LPA level apply in this regard									c way : as d The sals			

# 5.8.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

Please see Section 7.3 of this Report.

#### 5.8.6 Proposed Mitigation Measures / Recommendations

Issues surrounding surface water flood risk and water quality are not addressed within the Policy. It is



recommended that the Policy require a suitable assessment addressing both of these issues at the planning application stage and the incorporation of SuDS where necessary.

A previous iteration of the SEA recommended that uncertain effects previously highlighted regarding the site bring in close proximity to the Grade II listed Forge Cottage and The Old Forge to the south west be addressed through the requirement for a suitable assessment that identifies effects and addresses mitigation where necessary. This recommendation has been taken onboard and has been factored into the Policy in criterion ix. No recommendations regarding the historic environment are proposed at this stage.

# 5.9 Policy 8: Land formerly known as the Toat Café, Stane Street, Pulborough

### 5.9.1 Context / Justification

The Plan states that,

'This policy encourages the redevelopment of land currently partially occupied by the Toat Café but including a wider area of previously used land that has no beneficial use. As such, the site does not present an attractive gateway into the village, or to the National Park, from the main northern direction. For clarity, the policy only relates to the site defined on the Policies Map. However, support would be given to some development of the remainder of the land which has no beneficial use to provide a viable and sustainable mixed-use development to form an interesting new gateway to Pulborough and the South Downs National Park.'

# 5.9.2 Policy 8: Land formerly known as the Toat Café, Stane Street, Pulborough

The Policy reads as follows:

#### Policy 8: Land formerly known as the Toat Café, Stane Street, Pulborough

Support is given to the redevelopment of Land formerly known as the Toat Café as shown on the Policies Map for the following uses to include commercial, leisure, parkland and some enabling housing development. Support is given to any proposal subject to the following criterion are met:

- i. Safe Access is provided off the A29;
- ii. Any proposal should demonstrate it is appropriate to the local context. Particular regard should be given to design, height, massing and use of materials appropriate to the local context;
- iii. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park;
- iv. Where appropriate existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition from proposed development to the



wider open countryside and help to minimise the visual impact of the proposal.

- v. Any planning application should address the issues of poor surface water drainage in the area.
- vi. Any development should be sympathetic to existing listed buildings adjacent to the site.

#### 5.9.3 Alternatives Considered

Within the plan-making process the Policy has been amended to include some enabling housing development to ensure the viability of the commercial, leisure and parkland uses. Previously, an earlier draft of the Policy did not include enabling housing development on site, and instead the Policy included tourism uses. As such, the Plan's previous stance represents a reasonable alternative for exploration in this SEA. This alternative is:

• Alternative 8(1): That support is given to the redevelopment of Land formerly known as the Toat Café as shown on the Policies Map for the following uses to include commercial, leisure, parkland and tourism uses.

#### 5.9.4 Significant, Secondary and Temporal Effects

The 'policy-off' assessment of this site in Section 7 of this Report identifies the following potential negative effects that should ideally be addressed through site policy.

Uncertain	Negative	Significant negative
The site is located within the Minerals Safeguarding Areas (including 250m buffers) for both 'Building Stone' and 'Brick Clay Resource.' A very small area of land within the eastern part of the site is identified as having a medium risk from surface water flooding. The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site. The site is in close proximity to the Grade II listed Mill House to the south east and also the Grade II listed Cherry Tree Cottage to the west. The site is within an area of 'moderate' sensitivity to change (development) as identified within the	The site is within 50 metres / adjacent to a small water body. The site has been identified as experiencing road traffic noise at 65- 69.9 decibels associated with the A29 to the east. Approximately half of the site is within an area identified as having no-low landscape capacity, with the other half having low-moderate capacity. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).	The site is distanced from the existing built-up area boundary of Codmore Hill.

Strategic Environmental Assessment: Environmental Report



Horsham landscape Character Assessment (2003).

The effects of the Policy, in its ability to ensure that the above negative effects can be overcome, or positive effects maximised, are outlined below. This represents a 'policy-on' assessment.

#### Table 15: Impact on SEA Objectives: Policy 8

Assessment of Policy 8												
-	SEA Objectives											
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	+	-	+	?	?	0	0	0	0	+	+	0
Medium Term	+	-	+	?	?	0	0	0	0	+	+	0
Long Term	+	-	+	?	?	0	0	0	0	+	+	0
Assessment of Alternative 8(1)												
-	SEA Objectives											
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	+	?	0	?	0	0	0	0	0	+	+	0
Medium Term	+	?	0	?	0	0	0	0	0	+	+	0
Long Term	+	?	0	?	0	0	0	0	0	+	+	0
Commentary		The principle difference between the Policy as worded and the alternative										

The principle difference between the Policy as worded and the alternative approach surrounds the addition of an element of 'enabling residential development' to be included on site, presumably to ensure that the commercial, leisure and parkland elements are viable. The key differences within the appraisal will surround the addition of housing on the Policy, and its omission from the alternative. Crucially, the Section 7 assessment of the site highlighted significant negative effects regarding the site's distance from the existing built-up area boundary, which in turn has accessibility issues for any residential uses on the site. This is not a factor that is considered as significant for commercial and tourism uses, which is reflected in the effects identified for SEA Objective 2. In consideration of the key aims and objectives of the Plan, reiterated site selection criteria of other allocated sites for purely residential development (that housing be well related to existing services and facilities of the Pulborough main village builtup area boundary), residential development in this area will have negative effects on accessibility. Furthermore, negative effects were highlighted for road traffic noise which may be more keenly felt by residential development; despite this



effects regarding noise have been identified cautiously and it is acknowledged that other factors such as building materials and topography are likely to address these issues outside of the Plan's influence.

The Section 7 assessment identified potential negative effects related to a nearby small water body, landscape capacity and access issues. Of these, the Policy suitably addresses access, design and landscape. This ensures positive outcomes. The Policy does not however seek that any forthcoming planning application seek to identify issues surrounding water and if necessary, address them on site.

# 5.9.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

Please see Section 7.3 of this Report regarding the allocation of the site in light of alternative site options.

### 5.9.6 Proposed Mitigation Measures / Recommendations

It is recommended that, in light of the effects that can be expected on any new residents of the site in regard to accessibility issues, enabling residential development is not included within the Policy and that the alternative option is progressed.

The Policy does not seek that any forthcoming planning application seek to identify issues surrounding water and if necessary, address them on site. It is recommended that a policy criterion addressing this is included.

Uncertainty was identified in Section 7 regarding surface water flooding on site, an and an early iteration of the SEA recommended that mitigation be ensured through a policy criterion. This recommendation has been factored into the Policy in criterion v and as such, no effects can be predicted as a result of the Policy.

Additionally, the Policy now also addresses the implications of the site being in the 'Zone of Influence' of the Arun Valley SPA and Ramsar, as also highlighted as a concern in the SEA of an early iteration of the Plan. The HRA / AA undertaken for the Plan includes policy recommendations in this regard and have been factored into the Plan.

Furthermore, no effects can be considered regarding the historic environment, due to the inclusion of Policy criterion vi, which has been introduced as a result of a previous SEA recommendation. This recommendation was due to the site being in close proximity to the Grade II listed Mill House to the south east and also the Grade II listed Cherry Tree Cottage to the west.

# 5.10 Policy 9: Pulborough Garden Centre, Stopham Road

#### 5.10.1 Context / Justification

The Plan states that,

'This policy enables the appropriate expansion of the popular garden centre to the west of the village to create more jobs but only within defined area to minimise impact on the National Park.



The policy requires that the design of these proposals must show how the layout of new buildings will not harm the character of the Park.

This policy also protects the South Downs Light Railway which is a highly valued visitor attraction within the Centre.'

#### 5.10.2 Policy 9: Pulborough Garden Centre, Stopham Road

The Policy reads as follows:

#### Policy 9: Pulborough Garden Centre, Stopham Road

Proposals for development to intensify or to extend the existing garden centre and the facilities of its ancillary uses at Pulborough Garden Centre within the land shown on the Policies Map will be supported provided any proposed extension or addition:

- i. Has regard to conserving the special landscape and scenic beauty of the South Downs National Park;
- ii. Considers re-designing the entrance to accommodate any increase in traffic;
- iii. Reviews hours of operation due to the rural nature of the site and its locality;
- iv. Is designed in such a way that the massing and height of any proposal is appropriate to the area; and
- v. Any development should be sympathetic to existing listed buildings adjacent to the site.

#### 5.10.3 Alternatives Considered

Alternative sites / uses are explored in Section 7 of this Report.

#### 5.10.4 Significant, Secondary and Temporal Effects

The 'policy-off' assessment of this site in Section 7 of this Report identifies the following potential negative effects that should ideally be addressed through site policy.

Uncertain	Negative	Significant negative
The site is between 50 – 100 metres from the River Arun. The site is within groundwater Source Protection Zone 'Zone III – Total Catchment.' This is the area around a supply source within which all the groundwater ends up at the	The site is within an area of 'high' sensitivity to change (development) within the Horsham Landscape Character Assessment (2003).	The site is distanced form the built- up area boundary.



abstraction point. This is the point	
from where the water is taken.	
The site is adjacent to the Grade II	
listed Cokehurst to the west, and	
additionally in close proximity to the	
Grade II listed Coldharbour to the	
south east.	
There will be uncertain effects on	
landscape capacity as it is not	
included within the Landscape	
Capacity Assessment.	
Uncertain effects are highlighted in	
0 0	
response and in consideration of the	
fact that the site is within the South	
Downs National Park.	

The effects of the Policy, in its ability to ensure that the above negative effects can be overcome, or positive effects maximised, are outlined below. This represents a 'policy-on' assessment.

Table 16:	Impact of	ו SEA	<b>Objectives:</b>	Policy 9
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Assessment of Policy 9													
T	SEA Objectives												
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12	
Short Term	0	0	0	?	0	0	0	0	0	0	+	0	
Medium Term	0	0	0	?	0	0	0	0	0	0	+	0	
Long Term	0	0	0	?	0	0	0	0	0	0	+	0	
Commentary	Commentary The Section 7 assessment of the site identified the potential for a significant negative effect regarding the site's distance from the existing built-up area boundary, however such effects are not considered valid for a commercial use and rural employment development. There will be no effects on SEA Objective 11 as a result.												
	Section 7 also identifies negative effects related to the site being within an area of 'high' sensitivity to change (development) associated in part due to the site's location within the South Downs National Park. The Policy addresses these concerns through policy criteria that ensure that any proposed extension or addition of the garden centre will have regard to conserving the special landscape and scenic beauty of the South Downs National Park, and also be designed in such a way that the massing and height of any proposal is appropriate to the area.												



There will be neutral outcomes as a result.

Uncertain effects regarding proximity to the River Arun was also identified in the Section 7 assessment of the site. This consideration has not been factored into the site Policy and it is recommended that a criterion addressing this concern is included.

SEA work on a previous iteration of Plan raised a concern regarding the site being adjacent to the Grade II listed Cokehurst to the west, and additionally being in close proximity to the Grade II listed Coldharbour to the south east. The SEA at that stage proposed a recommendation that a criterion be included to address this. This recommendation was taken onboard, and is included within Policy criterion v. As such no effects on the historic environment have been predicted as a result of the Policy wording.

# 5.10.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

Please see Section 7.3 of this Report.

#### 5.10.6 Proposed Mitigation Measures / Recommendations

Uncertain effects regarding proximity to a small water body were also identified in the Section 7 assessment of the site. This consideration has not been factored into the site Policy and it is recommended that a criterion addressing this concern is included.

SEA work on a previous iteration of Plan raised a concern regarding the site being adjacent to the Grade II listed Cokehurst to the west, and additionally being in close proximity to the Grade II listed Coldharbour to the south east. The SEA at that stage proposed a recommendation that a criterion be included to address this. This recommendation was taken onboard, and is included within Policy criterion v. As such no effects on the historic environment have been predicted as a result of the Policy wording.

# 5.11 Policy 10: Multi-Purpose Community & Sports Centre, Pulborough

#### 5.11.1 Context / Justification

The Plan states that,

'The Parish Council has developed plans for this expansion and will utilise funds already collected from past development projects. Given the close proximity of the New Place Farm site allocated in Policy 2 of the PPNP, it is appropriate that that scheme also makes a financial contribution to the implementation of this policy. Current plans to improve and extend do not involve developing outside of the existing footprint.'



#### 5.11.2 Policy 10: Multi-Purpose Community & Sports Centre, Pulborough

The Policy reads as follows:

Policy 10: Multi-Purpose Community & Sports Centre, Pulborough

Proposals to improve and extend the existing sports pavilion on Rectory Close, as shown on the Policies Map, including the provision of new community (D2) use buildings, will be supported.

#### 5.11.3 Alternatives Considered

No alternatives are considered necessary for exploration in this Report.

### 5.11.4 Significant, Secondary and Temporal Effects

#### Table 17: Impact on SEA Objectives: Policy 10

Assessment of Policy 10													
	SEA C	EA Objectives											
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12	
Short Term	+	+	0	0	0	0	0	0	0	0	0	0	
Medium Term	+	+	0	0	0	0	0	0	0	0	0	0	
Long Term	+	+	0	0	0	0	0	0	0	0	0	0	
Commentary	The Policy can be seen to have direct positive effects related to improving health. Positive effects are also highlighted regarding accessibility to services in so far as any D2 expansion of the offer on-site could lead to residents being in close proximity to a wider leisure / recreational offer that previously they would have to										ar as		

travel outside of the Plan area to experience. No effects have been identified for any other sustainability objectives as the site is free of any constraints that could be compromised through any intensification of built structures resulting from the D2 stance of the Policy.

# 5.11.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

The Policy has been included within the Plan and selected as it enables the expansion of existing facilities on Rectory Close to meet the growing demand from the larger village population, including those related to the plan's site allocations and the resulting increase of residents.



#### 5.11.6 Proposed Mitigation Measures / Recommendations

No recommendations are made for this Policy.

## 5.12 Policy 11: West Glebe, Pulborough

### 5.12.1 Context / Justification

The Plan states that,

'There is a need for additional graveyard space and the adjoining path that runs along the edge of the space is becoming increasingly popular with people walking between the railway station and the new residential areas to the north. This policy is designed to make the area more attractive and in keeping with a village setting and the conservation area.'

#### 5.12.2 Policy 11: West Glebe, Pulborough

The Policy reads as follows:

#### Policy 11: West Glebe, Pulborough

Proposals to extend the graveyard into, and to lay out a new public footpath across, land at West Glebe, as shown on the Policies Map, will be supported, provided they do not harm the openness of the Local Green Space.

### 5.12.3 Alternatives Considered

Alternatives explored regarding different uses for this site are considered in the assessment of Policy 1 in this report, and also Section 7.

### 5.12.4 Significant, Secondary and Temporal Effects

Assessment of Policy 11												
-	SEA C	bjective	S									
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	0	+	0	0	0	0	?	0	?	0	0	0
Medium Term	0	+	0	0	0	0	?	0	?	0	0	0

Table 18: Impact on SEA Objectives: Policy 11



Long Term	0	+	0	0	0	0	?	0	?	0	0	0
Commentary	the pr	roposed	l purpo	se of th	e site.	Positive	e indire	of the S ct effect Iblic foo	ts have	been h	highligh	ted
	may f such, identi exace surfac weste water	nave a p uncerta fied reg erbate is ce wate ern bour flood ri	ootentia ain effe arding ssues. r flood ndary. I	al effect cts hav surface The site risk sca t should the his	on the e been water e conta attered d be no toric er	setting highligi flood ris ins sma through ted hov	or othe hted. F sk shou III areas lout, wi vever th ent exis	Church a erwise t urther u uld any s of a lo th an ar nat polic st at the site.	hrough incertai forthcoi w and i rea of h cies reg	constru nty has ming pr medium igh risk garding	uction. been roposal n risk fr at the surface	As s om site's e

# 5.12.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

This policy allows for some public benefits on a proposed Local Green Space that do not compromise its open character or location within the Conservation Area. The site has been assessed for housing development within Section 7 of this Report and also the Site Assessment Report and the possibility of significant negative effects related to the historic environment have been identified. The site is within the setting of a Grade I listed church and the Policy outlines a potential future use alongside that of Policy 14 which designates the land as a Local Green Space.

#### 5.12.6 Proposed Mitigation Measures / Recommendations

No recommendations are made for this Policy.

### 5.13 Policy 12: Tourism Development

#### 5.13.1 Context / Justification

The Plan states that,

'This policy encourages new proposals to come forward around the station to encourage more tourism trips from the station to the village and National Park. To support this proposal, an interactive WildArt trail has been established which encompasses a 4 kilometre walk between Pulborough station and the RSPB nature reserve within the South Downs National Park.

The new Digital Tourist Information Boards will be supported as they will provide useful and varied information for those visiting Pulborough for the first time.'



#### 5.13.2 Policy 12: Tourism Development

The Policy reads as follows:

#### **Policy 12: Tourism Development**

Proposals for the development of new tourism facilities to encourage trips from the railway station to the South Downs National Park will be supported provided they have regard to conserving the special landscape and scenic beauty of the National Park.

#### 5.13.3 Alternatives Considered

No alternatives are considered necessary for exploration in this Report.

related development.

### 5.13.4 Significant, Secondary and Temporal Effects

Table 19: Impact on SEA Objectives: Policy 12

Assessment of Policy 1	2											
	SEA O	bjective	S									
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	+	0	0	0	0	0	0	?	0	0	+	+
Medium Term	+	0	0	0	0	0	0	?	0	0	+	+
Long Term	+	0	0	0	0	0	0	?	0	0	+	+
Commentary	econo may s station transp There area t text. T throug	omic ac atimulation area. bort thro may a hrough he Poli gh incre	likely to tivity fro e furthe There w bugh the lso be p the est icy may easing ro s Nation	om the t r albeit will be i e Policy oositive ablishn r howey ecreatio	tourism minor ndirect /, by en implica nent of ver have onal pre	sector. tourism minor p courag ations re the Wil some essure t	It is por related positive ing pub egardin dArt tra negative to the F	ossible d growt effects olic tran g healt il as sp ve effec SPB n	that if s h in and s on pro sport w h for re pecified cts rega ature re	arding b arding sidents in the s arding b eserve	ful effe d the tr sustain and cyc on the support viodiver within t	cts rain nable cling. Plan ing sity he

to support any planning application in regard to ecological impacts of any tourism



# 5.13.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

The Policy reflects a position to encourage tourist numbers within the Plan area and beyond which is likely to have some degree of positive local benefit in line with Plan and community aims.

#### 5.13.6 Proposed Mitigation Measures / Recommendations

No recommendations are made for this Policy.

### 5.14 Policy 13: Community Facilities

#### 5.14.1 Context / Justification

The Plan states that,

'This policy serves two purposes; it firstly sets out which community facilities should be protected from unnecessary loss and secondly it makes provision for their improvement to support their ongoing viability.

The facilities selected are all highly valued by the local community and collectively deliver a wide range of community benefits.

The policy also encourages the improvement of community facilities to enable them to remain viable. This may require new development to extend the existing facility and this will be supported in principle, provided any issues with additional car parking or with local amenities can be satisfactorily resolved.'

#### 5.14.2 Policy 13: Community Facilities

The Policy reads as follows:

#### **Policy 13: Community Facilities**

Proposals to improve the viability of an established community use of the following buildings and facilities by way of the extension or partial redevelopment of existing buildings will be supported, provided the design of the scheme and the resulting increase in use are appropriate in design terms and will not harm the amenities of adjoining residential properties:

- 1. Village Hall
- 2. Allotments sites
- 3. St Mary's Primary School
- 4. Youth Club



- 5. Sports Pavilion, Rectory Close
- 6. Bowling Club, Rectory Close
- 7. Library/Community hub
- 8. St Mary's Church
- 9. United Reformed Church
- 10. Roman Catholic Church and accompanying car park

#### 5.14.3 Alternatives Considered

No alternatives are considered necessary for exploration in this Report.

#### 5.14.4 Significant, Secondary and Temporal Effects

Table 20: Impact on SEA Objectives: Policy 13

Assessment of Policy 1	3											
T 15% /	SEA O	bjective	S									
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	+	+	0	0	0	0	0	0	?	0	0	+
Medium Term	+	+	0	0	0	0	0	0	?	0	0	+
Long Term	+	+	0	0	0	0	0	0	?	0	0	+

Commentary

The Policy will have positive implications on ensuring that community facilities in the Parish are retained, and takes an approach that should redevelopment or expansion be required to make existing facilities viable, then that can be justified in planning terms. This will ensure that minor positive effects are realised for those SEA Objectives regarding health (should facilities support active lifestyles) and accessibility to services and facilities. Minor indirect effects will be realised through the Policy's preventative approach to the loss of facilities which should this occur would likely see residents travelling outside the Parish for a similar offer.

The approach has however been assessed as having uncertain effects on the historic environment, through many of the listed facilities being within or in close proximity to Conservation Areas. The expansion or redevelopment of existing facilities may have an impact, however the Policy's wording regarding 'design terms' hints that such schemes would not be appropriate. No thematic policy



regarding the historic environment is included within the Plan, although policy exists at the District level that should ensure that any such proposals are not permitted.

# 5.14.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

The Policy exists to protect and retain valuable community uses in the Parish. The Plan justifies the approach taken by stating that unless those benefits are no longer required by the community then the policy requires they are protected. Should a development scheme require the loss of a facility that cannot be justified in that way – and very clear evidence should be given – then a replacement facility of at least equal benefit must be provided so that it can be occupied prior to the loss of the existing facility. It must also be provided in such a way that it is convenient to the local community. In due course, the Parish Council may make applications to the District Council for the designation of some or all of these facilities as Assets of Community Value under a separate provision of the Localism Act.

### 5.14.6 Proposed Mitigation Measures / Recommendations

No recommendations are made for this Policy.

### 5.15 Policy 14: Local Green Spaces

#### 5.15.1 Context / Justification

The Plan states that,

'This policy designates those open spaces within and adjoining the built-up area as Local Green Spaces to give them the equivalent protection to the Green Belt in order to prevent harmful development.

There are many other open spaces in the parish that have an amenity or visual benefit for the local community. These spaces do not qualify as Local Green Spaces but are already offered protection by other development plan policies.'

#### 5.15.2 Policy 14: Local Green Spaces

The Policy reads as follows:

**Policy 14: Local Green Spaces** 

The Neighbourhood Plan designates Local Green Spaces in the following locations, as shown on the Policies Map:

1. Main Recreation Ground including Bowling Club



2. Cousins Way Recreation Ground including Allotment Site

- 3. Rivermead Nature Reserve
- 4. East Glebe Field
- 5. West Glebe Field
- 6. Marehill Common
- 7. Nutbourne Common Recreation Ground

Proposals for development in a Local Green Space will be resisted, unless they are ancillary to the use of the land for a public recreational purpose or are required for a statutory utility infrastructure purpose.

#### 5.15.3 Alternatives Considered

Alternative uses regarding 'West Glebe Field' for residential development are discussed within the assessment of Policy 1 of this report, and also assessed in Section 7.

#### 5.15.4 Significant, Secondary and Temporal Effects

Assessment of Policy 14												
SEA Objectives												
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	+	0	0	0	0	+	+	+	+	+	0	0
Medium Term	+	0	0	0	0	+	+	+	+	+	0	0
Long Term	+	0	0	0	0	+	+	+	+	+	0	0
Commentary	The Policy can be expected to have direct positive effects on those SEA Objectives regarding health (should Local Green Space be available for public use) and landscape. Indirectly, secondary effects can also be expected regarding											

 Table 21:
 Impact on SEA Objectives: Policy 14

The Policy can be expected to have direct positive effects on those SEA Objectives regarding health (should Local Green Space be available for public use) and landscape. Indirectly, secondary effects can also be expected regarding the presence of green space and its contribution in terms of climate change (emissions), natural flood alleviation, biodiversity and the historic environment through preserving the setting of listed buildings. This is particularly the case in regard to West Glebe field, which is within the setting of a Grade I listed Church.



# 5.15.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

The Plan states that the evidence base includes a study which describes each space in detail and sets out how they can be justified in accordance with the criteria established by the National Planning Policy Guidance (paras 76-77). The evidence suffices to justify the Policy's approach and for the reasons of ensuring that built development is integrated into the landscape the Policy has been included.

### 5.15.6 Proposed Mitigation Measures / Recommendations

No recommendations are made for this Policy.

### 5.16 Policy 15: Design

#### 5.16.1 Context / Justification

The Plan states that,

'This policy requires the design of development proposals to acknowledge and respond to the existing characteristics of the parish. Both Pulborough and Nutbourne have adopted village design statements (in the evidence base), to which all proposals in those areas should refer. In addition, the policy has drawn from those statements some design principles of special importance to determining the quality of a design proposal. Applicants should pay special attention to those principles when preparing their applications and design statements.'

### 5.16.2 Policy 15: Design

The Policy reads as follows:

#### Policy 15: Design

Since work started on the Neighbourhood Plan in 2013 – and since both the Pulborough and Nutbourne Design Statements were published – there is a wide realisation that climate change is now inevitable. The Neighbourhood Plan Steering Group is concerned that there needs to be greater emphasis that all construction, including extensions and renovations, are planned with the needs of living in warmer and wetter conditions. Rising sea levels might be expected to affect the tidal flows and winter flood levels of the River Arun.

The Neighbourhood Plan Steering Group would like to draw attention to the recent work of the scientists of BRE Group (previously Building Research Establishment) in developing the BREEAM range of sustainability standards and especially the Home Quality Mark (HQM). HQM is a national standard for new homes, which uses a simple 5-star rating to provide impartial information to home-owners and buyers from independent experts on a new home's design, construction quality and running costs.

The scale, density, massing, height, landscape design, layout and materials of all development proposals, including alterations to existing buildings, will be required to reflect the architectural and historic character and scale of the surrounding buildings and landscape, as detailed in the Pulborough Design Statement and



Nutbourne Design Statement. In particular, the effects of any proposed development should respect any conservation area within the parish.

Particular regard should be had to the design principles which start on page 43 of the Pulborough Design Statement.

#### 5.16.3 Alternatives Considered

No alternatives are considered necessary for exploration in this Report.

#### 5.16.4 Significant, Secondary and Temporal Effects

#### Table 22: Impact on SEA Objectives: Policy 15

Assessment of Policy 1	5											
T	SEA C	bjective	S									
Temporal Effects	1	2	3	4	5	6	7	8	9	10	11	12
Short Term	0	0	0	0	0	+	0	0	0	+	0	0
Medium Term	0	0	0	0	0	+	0	0	0	+	0	0
Long Term	0	0	0	0	0	+	0	0	0	+	0	0

Commentary

The Policy sets out an approach that seeks out both energy efficiency in new development within the Parish as well as design that reflects the architectural and historic character of the area in which it is located. This will lead to positive effects in regard to SEA Objective 6 (addressing climate change and energy efficiency). There will also be positive effects through the Policy's landscape requirements.

The SEA of an early iteration of the Plan highlighted some potential incompatibilities as to how proposals that are located in close proximity to the Plan area's two Conservation Areas could respect local characteristics whilst also adhering to BREEAM and HQM standards. For this reason, the Policy was assessed as having uncertain effects in regard to the historic environment. The latest iteration of the Policy includes that 'in particular, the effects of any proposed development should respect any conservation area within the parish' which would act to ensure the protection objectives of conservation areas would have to be considered in any scheme in the first instance. As such, no effects are now highlighted for SEA Objective 9.



# 5.16.5 Reasons for Selecting the Preferred Policy / Rejecting Alternative Options

The Policy is justified in terms of protecting the local characteristics of the Parish and contributing to, or ensuring, the energy efficiency of new homes. This is not considered contrary to District level or National planning policy and in that regard the Policy is justified in this stance.

### 5.16.6 Proposed Mitigation Measures / Recommendations

An SEA of a previous iteration of the Plan highlighted that in the absence of any thematic policy regarding the historic environment, it is recommended that the Policy or reasoned justification / supporting text is expanded to explain how applications within Conservation Areas will be viewed regarding adherence to BREEAM or HQM standards should there be a design conflict. This has been taken onboard through additional policy wording that requires the effects of any proposed development to respect any conservation area within the parish in the first instance. No recommendations are proposed at this stage.



# 6. The Cumulative & Synergistic Effects of the Plan's Land Use Policies

## 6.1 The Plan's 'Framework' Policies

The following table sets out the effects highlighted for each SEA Objective within the individual assessment of the Plan's Policy 1 and Policies 10-15. Cumulative and synergistic effects of these Policies in unison are also explored and discussed in order to better identify Plan wide effects.

The Plan's 'framework' policies are those policies that set the framework for development within the Plan area, and do not allocate land for development purposes. The cumulative and synergistic effects of the Plan's site allocation Policies (Policies 2-9) are explored in Section 6.2 of this Report.

	EA Objs										
SEA Objs	Policy 1	Policy 10	Policy 11	Policy 12	Policy 13	Policy 14	Policy 15	Impact			
1	+	+	0	+	+	+	0	+			
2	+	+	+	0	+	0	0	+			
3	++	0	0	0	0	0	0	0			
4	?	0	0	0	0	0	0	0			
5	?	0	0	0	0	0	0	0			
6	?	0	0	0	0	+	+	0			
7	?	0	?	0	0	+	0	0			
8	?	0	0	?	0	+	0	0			
9	+	0	?	0	?	+	0	0			
10	?/-	0	0	0	0	+	+	+			
11	0	0	0	+	0	0	0	0			
12	+	0	0	+	+	0	0	0			

Table 23: Cumulative & Synergistic Effects of the Plan's Land Use Policies

The Plan's 'framework' policies have been assessed as having predominantly 'no impact' or neutral effects on the majority of the SEA Objectives, particularly for environmental factors of sustainability. This reflects the



Plan's stance of deliberately avoiding the repetition of existing national or local planning policies. The proposed policies of the Plan focus on a relatively small number of key development issues in the area and these are reflected in the positive cumulative effects identified regarding health (through multiple policies ensuring that open space and facilities pertaining to healthy lifestyles are retained or expanded), accessibility (through ensuring the retention and expansion of services and facilities), and landscape (through several policies ensuring good design and enhancing local distinctiveness). Policies can combine to ensure more positive outcomes on some tenets of sustainability throughout the Plan area than they would do individually, particularly if they are focused on different themes.

# 6.2 The Plan's Site Allocation Policies

The following table sets out the effects highlighted for each SEA Objective within the individual assessment of the Plan's site allocation Policies 2-9. Cumulative and synergistic effects of these Policies in unison are also explored and discussed in order to better identify Plan wide effects.

054	Long Term Impacts of Policies										
SEA Obj.	Policy 2	Policy 3	Policy 4	Policy 5a	Policy 5b	Policy 6	Policy 7	Policy 8	Policy 9	ulative Impact	
1	+	0	0	0	0	0	0	+	0	0	
2	?	?	?	+	0	+	+	-	0	?	
3	++	+	+	?	+	+	0	+	0	++	
4	0	0	?	?	?	?	?	?	?	?	
5	?	0	0	?	?	?	0	?	0	0	
6	0	0	0	0	0	0	+	0	0	0	
7	+	0	0	?	0	0	?	0	0	0	
8	0	0	?	?	?	0	0	0	0	?	
9	0	0	0	0	0	+	0	0	0	0	
10	+	+	+	+	+	?	+	+	0	0	
11	0	0	+	+	0	0	+	+	+	+	
12	+	0	0	0	0	0	0	0	0	0	

Table 24: Cumulative & Synergistic Effects of the Plan's Site Allocations



Whereas SEA Objective 2 addresses accessibility, effects have been identified that regard both road access and also access to services and facilities. Broadly, the sites allocated are all located in close proximity to services and facilities, however many of the site policies do not require access solutions to be sought of proposals. Despite this, effects are realised singularly, and not cumulatively on the whole, aside from a cumulative concern regarding access from Glebelands for the Plans' Policy 2 allocation (for 170 dwellings) and Policy 3 (for 20 dwellings). Cumulatively, and with separate access points on this narrow road, there could be negative implications from multiple developments. This SEA however only raises a concern at this stage in the absence of any firm evidence and considers that further information is likely to be included at the masterplanning stage as included within Policy 2 and dealt with at the development management stage. Effects are unknown at this stage although it should be acknowledged that West Sussex County Council Highways have not identified any of their own concerns regarding the New Place Nurseries site. The Plan also has included a Community Aim within the Plan that seeks suitable access from this site.

Significant positive cumulative effects are assessed regarding SEA Objective 3 (meeting local housing needs). The Plan not only meets the necessary quantum of housing growth, but also ensures a mix of types, tenures and affordability through the various Plan policies.

Uncertain cumulative effects are realised for water quality, in consideration of several allocations being in a Groundwater Source Protection Zone. Many effects are also highlighted individually regarding effects on nearby water bodies, but it is considered that these effects are not common to a single receptor.

The potential for cumulative negative effects regarding biodiversity is raised at this point, stemming from the findings of the HRA / AA work undertaken to accompany the Plan that explored effects regarding the level of housing growth in the Plan area on the Arun Valley SPA and Mens SAC. Although the AA ensures that mitigation can be ensured, and such assurances exist through the Plan including the recommendations of the AA, more detailed effects will only be realised through the project-level HRA/AA required of each development proposal. Overall, there is uncertainty surrounding the cumulative effects regarding Habitats Sites, associated with the moving position of in-combination effects that may be identified within the project-level HRA/AAs of any of the Plan's allocations at the time of applications being submitted.

There will be positive effects also on the allocation of numerous sites for commercial uses and employment land. Together, this can be seen to support the level of housing growth in the Plan area, and ensure that there is no significant loss of employment at the Plan level.

Effects on landscape have been assessed as cumulatively neutral. Whilst many of the Plan policies will ensure positive outcomes through policy approaches, cumulatively there will be an inevitable loss of greenfield land in areas where landscape capacity is 'low', and sensitivity is high. In response to the level of housing growth needed, the Plan does well to predominately allocate brownfield land for development and ensure that only modest growth is experienced in sensitive landscapes.



# 7. The Assessment of the Plan's Allocations (including Alternatives)

## 7.1 How have Site Options been identified?

As part of the process to produce the Pulborough Neighbourhood Plan, a "Call for Sites" inviting suggestions of land for potential development was conducted during August and September 2014 in the following ways:

- A "Call for Sites" section was included in the household survey that was delivered to every property in the Parish.
- Articles were placed in the Pulborough Bulletin which is delivered to every home in Pulborough parish.
- Articles were placed in the West Sussex County Times newspaper.
- Emails were sent to local developers, councils, businesses and landowners.
- Announcements were published on the Parish Council website.

Following a submission by Horsham DC to the Steering Group of the Neighbourhood Plan to review its site assessment policy, a further "Call for Sites" was sent out in May 2017.

A total of 33 sites in all were submitted for consideration, some of which had previously been submitted to Horsham DC for its Local Plan Strategic Housing & Economic Land Availability Assessment (SHELAA) in December 2018.

#### 7.1.1 What are the 'reasonable alternatives'?

The SEA needs to consider and compare the reasonable alternatives as the plan evolves, including preferred approaches. Planning Practice Guidance states that, *'reasonable alternatives are the different realistic options considered in developing the policies in the plan. They need to be sufficiently distinct to highlight the different environmental implications of each so that meaningful comparisons can be made. However, it may be that the strategic policies for the neighbourhood area limit the alternatives that can realistically be considered.'* 

Regarding sites, site assessment work has been undertaken by the Neighbourhood Plan Steering Group and consultants AECOM. The Pulborough Neighbourhood Plan Site Assessment Report (2019) omits sites from consideration for a number of 'suitability' reasons; i.e. key constraints exist on site that cannot be resolved or mitigated. Such sites were categorised red under a 'RAG' rating (indicating an absolute or insurmountable constraint) within that assessment and as such are deemed unsuitable for selection in the Plan as allocations and as 'reasonable alternatives' within this SA. In total, 12 of the 33 sites submitted have been considered inappropriate for site allocation. The reasons for the red 'RAG' categorisation in each instance are set out in the table below.

The AECOM Site Assessment Report also identifies two 'Indicative Housing Capacity' options for 'reasonable' sites. These are identified as firstly the figure that the landowner has identified for the site, and secondly a yield that has been identified through a 'policy on' mechanism, in this case a 30 dwellings per hectare calculation. This ensures that in some cases (as discussed in the table below), two different site



assessments may be applicable in this SEA Environmental Report. It should be noted that within the SEA, alternatives are identified as those that are 'sufficiently distinct' to highlight the different environmental implications of each so that meaningful comparisons can be made. It is possible that different housing yields at a site would be extremely unlikely to be sufficiently distinct and not have any different environmental considerations, for instance if the difference in yield is very small.

Discussion of whether this applies in each instance is included in the following table.

Site reference	Site name	Indicative ho capacity (fror Site Assessm	n AECOM	Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if
		Landowner assumption	@ 30 dwellings per hectare		relevant
PPNP01	West Glebe Field	8	46	The difference between the 'landowner assumption' and 'policy-on' yields for the site is sufficiently large to warrant additional assessment.	<ul> <li>PPNP01(a) – 8 dwellings</li> <li>PPNP01(b) – 46 dwellings</li> </ul>
PPNP02	Land north of Church House	N/A	N/A	The AECOM Site Assessment Report identifies that this site is not currently available / developable. As such it is not considered a 'reasonable alternative.'	N/A
PPNP03	Police Station	Unknown	4	The site will be assessed at a yield of 4 dwellings.	There are no reasonable additional alternative yields for this site.
PPNP04	Railway Station Industrial Estate	N/A	N/A	The AECOM Site Assessment Report identifies that this site is not currently available / developable. As such it is not considered a 'reasonable alternative.'	N/A
PPNP05	Land off Station Approach	27	18	This site is currently allocated within the Neighbourhood Plan within Policy 4 for a yield of 18 dwellings. The difference between the 'landowner	<ul> <li>PPNP05(a) – 18 dwellings</li> <li>PPNP05(b) – 27 dwellings</li> </ul>

 Table 25:
 Sites included within the SEA (allocations and alternatives)



Site reference		Indicative ho capacity (from Site Assessm	n AECOM	Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant		
		Landowner assumption	@ 30 dwellings per hectare		relevant		
				assumption' and 'policy-on' yields for the site is sufficiently large to warrant additional assessment.			
PPNP06	Harwoods Land Rover Bentley	39	31	This site is currently allocated within the Neighbourhood Plan within Policy 5a for a yield of 15 dwellings. The difference between the 'landowner assumption' and the yield for which the site is allocated is sufficiently large to warrant additional assessment.	<ul> <li>PPNP06(a) – 15 dwellings</li> <li>PPNP06(b) – 31- 39 dwellings</li> </ul>		
PPNP07	Land rear of 23-35 London Road	9	8	This site is currently allocated within the Neighbourhood Plan within Policy 5b for a yield of 9 dwellings. The 'landowner assumption' and 'policy-on' yields for the site are similar and not considered sufficiently distinct to warrant additional assessment.	There are no reasonable additional alternative yields for this site.		
PPNP08	46 London Road	1	1	The site will be assessed at a yield of 1 dwelling.	There are no reasonable additional alternative yields for this site.		
PPNP09	New Place Nurseries	100	206	This site is currently allocated within the Neighbourhood Plan within Policy 2 alongside PPNP10 (below) for a yield of 170 dwellings. The difference between the 'landowner	<ul> <li>PPNP09/10(a) – 170 dwellings</li> <li>PPNP09/10(b) – 316 dwellings</li> <li>PPNP09(c) – 206</li> </ul>		
PPNP10	Land adjacent to Drovers Lane	73	110	assumption' and 'policy-on' yields for the site is sufficiently large to warrant additional assessment.	dwellings • PPNP10(d) – 110 dwellings		



Site reference	Site name	Indicative ho capacity (from Site Assessm	n AECOM	Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant		
		Landowner assumption	@ 30 dwellings per hectare		relevant		
PPNP11	Land off Glebelands	21	17	This site is currently allocated within the Neighbourhood Plan within Policy 3 for a yield of 20 dwellings. The 'landowner assumption' and 'policy-on' yields for the site are similar and not considered sufficiently distinct to warrant additional assessment.	There are no reasonable additional alternative yields for this site.		
PPNP12	Royal Mail Sorting Depot	N/A	N/A	The AECOM Site Assessment Report identifies that this site is not currently available / developable. As such it is not considered a 'reasonable alternative.'	N/A		
PPNP13	East Glebe Field	72	81	The difference between the 'landowner assumption' and the 'policy-on' yields is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.		
PPNP14	Ambulance Station	N/A	N/A	The site has planning permission and is therefore not included within the scope of this SEA or the Plan.	N/A		
PPNP15	15 The Spinney	4	4	The site will be assessed at a yield of 4 dwellings.	There are no reasonable additional alternative yields for this site.		
PPNP16	Pulborough Garden Centre	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site is not currently available / developable for housing development. As such it	There are no reasonable additional alternative uses for this site.		



Site reference	Site name	e name Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if
		Landowner assumption	@ 30 dwellings per hectare		relevant
				is not considered a 'reasonable alternative.' The site is identified within the Neighbourhood Plan Policy 9 as a site in which support will be given for proposals to intensify or extend the existing garden centre. The site will be assessed for employment uses within the area defined on the Plan's proposals map.	
PPNP17	Land at Highfield	25	26	This site is currently allocated within the Neighbourhood Plan within Policy 5b for a yield of 26 dwellings. The 'landowner assumption' and 'policy-on' yields for the site are similar and not considered sufficiently distinct to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP18	Coombelands Equestrian Site 1	60	45	The difference between the 'landowner assumption' and the 'policy-on' yields is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP19	Coombelands Equestrian Site 2	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding landscape (the site is in area 40 of the HDC Landscape Capacity Assessment Report with no or low capacity for large scale housing development), access, sewerage and drainage.	N/A



Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if
		Landowner assumption	@ 30 dwellings per hectare		relevant
				As such it is not considered a 'reasonable alternative.'	
PPNP20	Biarritz	31	16	The difference between the 'landowner assumption' and 'policy-on' yields for the site is sufficiently large to warrant additional assessment.	<ul> <li>PPNP20(a) – 31 dwellings</li> <li>PPNP20(b) – 16 dwellings</li> </ul>
PPNP21	Minto	6	11	The difference between the 'landowner assumption' and the 'policy-on' yields is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP22	Greendene Nurseries	75	56	The difference in housing yield is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP23	Puttocks Farm	291	218	The difference in housing yield is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP24	Land South of Broomers Hill Park	Unknown	90	This 3ha site has been assessed for a yield of 90 dwellings. There is no yield known as having been submitted by the landowner. This site has been allocated for employment use within Policy 7 and will be assessed for employment uses within the area defined on the Plan's proposals map.	<ul> <li>PPNP24(b) – employment use</li> <li>PPNP24(a) – 90 dwellings</li> </ul>
PPNP25	Land North of Broomers Hill Park	Unknown	Approx.60	No specific proposed land use is known for this site.	<ul> <li>PPNP25(a) – 60 dwellings</li> </ul>



Site Site name reference		Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if
		Landowner assumption	@ 30 dwellings per hectare		relevant
				This site has been assessed for a yield of approximately 60 dwellings based on a broad assumption related to the size of the site. There is no yield known as having been submitted by the landowner.	<ul> <li>PPNP25(b) – employment use</li> </ul>
				The site is also assessed for employment use due to the allocation of nearby land for such a use and the prevalence of employment uses in the broad area.	
PPNP26	Smyth Trust Grazing Land	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding its remoteness from the built up area boundary, its distance from community facilities and services, effects on landscape and settlement pattern, heritage, traffic, sewerage and drainage. As such it is not considered a 'reasonable alternative.'	N/A
PPNP27	Land at Toat Café and Lorry Park	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site for housing development, demonstrating that this site has issues surrounding its remoteness from the built up area boundary, its distance from community facilities and services, effects on landscape and settlement pattern, heritage, traffic, sewerage and drainage.	N/A



Site Site name reference		Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if
		Landowner assumption	@ 30 dwellings per hectare		relevant
				As such it is not considered a 'reasonable alternative' for housing development. This site has been allocated for employment and will be assessed for employment uses within the area defined on the Plan's proposals map.	
PPNP28	Murrells	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding its remoteness from the built up area boundary and distance from community facilities and service. As such it is not considered a 'reasonable alternative.'	N/A
PPNP29	Mare Hill House	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding the site's availability. It can not be demonstrated that the site can come forward within the Plan period.	N/A
PPNP30	Land at Batts Lane	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding its remoteness from the built up area boundary and distance from community facilities and services. As such it is not considered a 'reasonable alternative.'	N/A

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Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if
		Landowner assumption	@ 30 dwellings per hectare		relevant
PPNP31	Longlands	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding its remoteness from the built up area boundary, its distance from community facilities and services, access, and effects on trees. As such it is not considered a 'reasonable alternative.'	N/A
PPNP32	Carpe Diem	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding the site's availability. It can not be demonstrated that the site can come forward within the Plan period.	N/A
PPNP33	Manor Farm	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding the site's availability. It can not be demonstrated that the site can come forward within the Plan period. As such it is not considered a 'reasonable alternative.	N/A

The following table outlines a summary of the effects identified in the detailed assessment of sites within Section 7.2 of this Report. A 'RAG' system has been included that outlines the expected effect for each of the SEA Objectives and assessment criteria.

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#### Table 26: Site assessment summary of effects (allocations and alternatives)

	Site	asses	smen	its N	NB.	(R): R	eside	ntial เ	ise	(E):	Emple	oymer	nt use	(I	M): Mi	xed-u	se												
eria	Allo	cated	sites							Alte	nativ	e (reje	cted)	sites															
SEA Objective & criteria	PPNP09/10(a) (R)	PPNP11 (R)	PPNP05(a) (M)	PPNP06(a) (M)	PPNP07 (R)	PPNP17 (R)	PPNP24(b) (E)	PPNP27 (E)	PPNP16 (E)	PPNP01(a) (R)	PPNP01(b) (R)	PPNP03 (R)	PPNP05(b) (R)	PPNP06(b) (R)	PPNP08 (R)	PPNP09/10(b) (R)	PPNP09(c) (R)	PPNP10(d) (R)	PPNP13 (R)	PPNP15 (R)	PPNP18 (R)	PPNP20(a) (R)	PPNP20(b) (R)	PPNP21 (R)	PPNP22 (R)	PPNP23 (R)	PPNP24(a) (R)	PPNP25(a) (R)	<b>PPNP</b> 25(b) (E)
1. To in	nprove	the he	ealth o	of the p	opulat	ion ov	erall a	nd rec	luce he	ealth ir	nequa	lities																	
(1.1)	0	0	0	0	0	0	0	0	0			0	0	0	0	0	0	0		0	0	0	0	0	0	0	0	0	0
(1.2)	+	+	?	?	+	+	+	+	+	+	+	+	?	?	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
2. To er	nsure s	service	es and	faciliti	ies are	acces	sible f	or all a	and the	e inclu	sion o	f nece	ssary i	nfrastr	ucture														
(2.1)	+	+	+	+	+	+	N/A	N/A	N/A	+	+	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	-	-	N/A
(2.2)	+	+	+	+	+	+	N/A	N/A	N/A	+	+	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	-	-	N/A
(2.3)	?	+	+	+	+	+	N/A	N/A	N/A	+	+	+	+	+	+	?	?	-	+	+	+	+	+	+	+	+	+	-	N/A
(2.4)	+	+	+	+	+	+	N/A	N/A	N/A	+	+	+	+	+	+	+	+	-	+	+	+	+	+	+	+	+	+	+	N/A

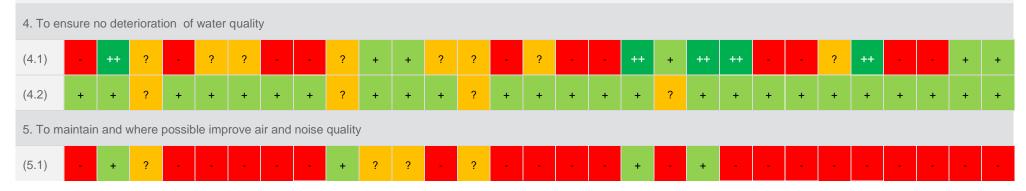
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Site a	asses	smen	ts N	IB.	(R): R	eside	ntial u	ise	(E):	Emplo	oymen	it use	(1	M): Mi	xed-u	se												
Alloc	ated	sites							Alter	native	e (reje	cted)	sites															
PPNP09/10(a) (R)	PPNP11 (R)	PPNP05(a) (M)	PPNP06(a) (M)	PPNP07 (R)	PPNP17 (R)	PPNP24(b) (E)	PPNP27 (E)	PPNP16 (E)	PPNP01(a) (R)	PPNP01(b) (R)	PPNP03 (R)	PPNP05(b) (R)	PPNP06(b) (R)	PPNP08 (R)	PPNP09/10(b) (R)	PPNP09(c) (R)	PPNP10(d) (R)	PPNP13 (R)	PPNP15 (R)	PPNP18 (R)	PPNP20(a) (R)	PPNP20(b) (R)	PPNP21 (R)	PPNP22 (R)	PPNP23 (R)	PPNP24(a) (R)	PPNP25(a) (R)	PPNP25(b) (E)
++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
?	-	++	+	+	-	N/A	N/A	N/A	++	++	+	++	+	+	?	?	-	++	?	+	+	+	+	+	+	++	++	N/A
	+ PPNP09/10(a) (R)	Allocated + PPNP09/10(a) (R) + PPNP11 (R)	Allocated sites + PPNP09/10(a) (R) + PPNP05(a) (M)	Allocated sites (N) (a) (b) (a) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	Allocated sites + PPNP09/10(a) (R) + PPNP05(a) (M) + PPNP05(a) (M) + PPNP07 (R) + PPNP07 (R)	Allocated sites (I) (a) (b) (a) (c) (a) (c) (a) (c) (a) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	Allocated sites + PPNP09/10(a) (R) + PPNP05(a) (M) + PPNP05(a) (M) + PPNP07 (R) + PPNP17 (R) + PPNP24(b) (E)	Allocated sites ++ PPNP05(a) (R) ++ PPNP05(a) (M) ++ PPNP05(a) (M) ++ PPNP07 (R) ++ PPNP17 (R) ++ PPNP27 (E) ++ PPNP27 (E)	Allocated sites ++ PPNP05(a) (M) ++ PPNP05(a) (M) ++ PPNP05(a) (M) ++ PPNP05(a) (M) ++ PPNP07 (R) ++ PPNP07 (R) ++ PPNP17 (E) ++ PPNP16 (E)	Allocated sites Alter ++ PPNP05(a) (M) (R) (R) (R) (R) (R) (R) (R) (R) (R) (R	Allocated sites Alternative (I) (I) (I) (I) (I) (I) (I) (I) (I) (I)	Allocated sites Alternative (reje (W) (B)04002 (W) (B)04002 (W) (B)0400 (B) (W) (B)0400 (B)	Allocated sites Alternative (rejected)  Alternative (rejected)  Alternative (rejected)  Alternative (rejected)  (N) (N) (N) (N) (N) (N) (N) (N) (N) (	Allocated sites   (a) (b)   (b) (b)   (b) (c)   (c) (c)	Allocated sites   Allocated sites     Allocated sites     Alternative (rejected) sites     (N)     (N) <	Allocated sites   (a) (b) 01/600 M03 (c)   (b) 10(a) (c)   (b) 10(a) (c)   (c) 10(c)   (c	Allocated sites   (a) (b) (a) (b) (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	Allocated sites   (a) (b) (b) (c) (a) (b) (c) (a) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	Allocated sites   (a) (b) (a) (b) (a) (b) (a) (b) (b) (a) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	Allocated sites   Allocated sites     Allocated sites     Alternative (rejected) sites     (W)     (H)     (H) <	Allocated sites   Allocated sites     Allocated sites <t< td=""><td>Allocated sites   Allocated sites     Allocated sites     Alternative (rejected) sites     (W) (a) (b) (b) (a) (b) (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c</td><td>Allocated sites   Allocated sites Alternative (rejected) sites   (N) (N)   (N) (N)</td><td>Allocated sites   Allocated sites     (a) (b) (b) (a) (b) (a) (b) (b) (b) (b) (c) (b) (b) (c) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c</td><td>Allocated sites Allocated sites Alternative (rejected) sites (M) (a) (A</td><td>Allocated sites (N) (a) (b) Alton (c) (c) (c) (c) (c) (c) (c) (c) (c) (c)</td><td>Allocated sites (N) (a) (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c</td><td>Allocated sites (N) (e)01/60dNdd (N) (e)20dNdd (N) (E)20dNdd (</td></t<>	Allocated sites   Allocated sites     Allocated sites     Alternative (rejected) sites     (W) (a) (b) (b) (a) (b) (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	Allocated sites   Allocated sites Alternative (rejected) sites   (N) (N)   (N) (N)	Allocated sites   Allocated sites     (a) (b) (b) (a) (b) (a) (b) (b) (b) (b) (c) (b) (b) (c) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	Allocated sites Allocated sites Alternative (rejected) sites (M) (a) (A	Allocated sites (N) (a) (b) Alton (c)	Allocated sites (N) (a) (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	Allocated sites (N) (e)01/60dNdd (N) (e)20dNdd (N) (E)20dNdd (

3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.



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criteria	Alloc	cated s	sites							Alter	native	e (reje	cted) s	sites															
SEA Objective & cri	PPNP09/10(a) (R)	PPNP11 (R)	PPNP05(a) (M)	PPNP06(a) (M)	PPNP07 (R)	PPNP17 (R)	PPNP24(b) (E)	PPNP27 (E)	PPNP16 (E)	PPNP01(a) (R)	PPNP01(b) (R)	PPNP03 (R)	PPNP05(b) (R)	PPNP06(b) (R)	PPNP08 (R)	PPNP09/10(b) (R)	PPNP09(c) (R)	PPNP10(d) (R)	PPNP13 (R)	PPNP15 (R)	PPNP18 (R)	PPNP20(a) (R)	PPNP20(b) (R)	PPNP21 (R)	PPNP22 (R)	PPNP23 (R)	PPNP24(a) (R)	PPNP25(a) (R)	PPNP25(h) (F)
5.2)	?	?	+	+	+	?	?	?	+	?	?	+	+	+	+	?	?	?	+	+	?	?	?	?	?	?	?	?	?
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	Site a	asses	smen	ts N	IB.	(R): R	eside	ntial u	ise	(E):	Emplo	oymer	nt use	(	M): Mi	xed-u	se												
eria	Alloc	ated s	sites							Alte	native	e (reje	cted)	sites															
SEA Objective & criteria	PPNP09/10(a) (R)	PPNP11 (R)	PPNP05(a) (M)	PPNP06(a) (M)	PPNP07 (R)	PPNP17 (R)	PPNP24(b) (E)	PPNP27 (E)	PPNP16 (E)	PPNP01(a) (R)	PPNP01(b) (R)	PPNP03 (R)	PPNP05(b) (R)	PPNP06(b) (R)	PPNP08 (R)	PPNP09/10(b) (R)	PPNP09(c) (R)	PPNP10(d) (R)	PPNP13 (R)	PPNP15 (R)	PPNP18 (R)	PPNP20(a) (R)	PPNP20(b) (R)	PPNP21 (R)	PPNP22 (R)	PPNP23 (R)	PPNP24(a) (R)	PPNP25(a) (R)	PPNP25(b) (E)
(8.3)	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	?	+	+	+	+	+	+	+	+	+	+
(8.4)	+	+	-	-	-	+	+	+	+	+	+	-	-	-	-	+	+	+	-	-	+	-	-	-	-	-	+	+	+
9. To co	onserve	e and v	where	appro	priate	enhan	ce are	as an	d asse	ts of h	istoric	al and	archa	eologi	cal imp	ortan	ce.												
(9.1)	?	++	+	++	++	++	?	?	?	-	-		+	++	++	?	?	++	-	?	?	?	?	?	++	?	?	++	++
(9.2)	-	-	+	+	+	-	+	+	+	-	-	-	+	+	+	-	-	-	+	+	+	+	+	+	+	+	+	+	+
10. To (	conser	/e and	l enha	nce th	e qual	ity and	local	distina	ctive -	ness c	of lands	scape	s inclu	ding th	ne Sou	th Dov	wns Na	ational	Park										
(10.1)	?	?	0	0	0	?	?	?	-	0	0	0	0	0	0	?	?	?	0	0	?	?	?	?	?	?	?	?	?
(10.2)	++	++	++	-	?	++	++	++	++	++	++	++	++	-	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
(10.3)	-	-	++	+	+		-	?	?		-	++	++	+	-	-	-	-		?		?	?	?	-	-	-	-	-
(10.4)	+	+	++	++	++	?	?			+	+	++	++	++	++	+	+	+	++	++	+	+	+	+	+	+	?	-	-

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	Site a	asses	smen	ts N	B.	(R): R	eside	ntial ι	ise	(E):	Emplo	oymer	nt use	(	M): Mi	xed-u	ISE												
eria	Alloc	ated	sites							Alter	native	e (reje	cted)	sites															
SEA Objective & criteria	PPNP09/10(a) (R)	PPNP11 (R)	PPNP05(a) (M)	PPNP06(a) (M)	PPNP07 (R)	PPNP17 (R)	PPNP24(b) (E)	PPNP27 (E)	PPNP16 (E)	PPNP01(a) (R)	PPNP01(b) (R)	PPNP03 (R)	PPNP05(b) (R)	PPNP06(b) (R)	PPNP08 (R)	PPNP09/10(b) (R)	PPNP09(c) (R)	PPNP10(d) (R)	PPNP13 (R)	PPNP15 (R)	PPNP18 (R)	PPNP20(a) (R)	PPNP20(b) (R)	PPNP21 (R)	PPNP22 (R)	PPNP23 (R)	PPNP24(a) (R)	PPNP25(a) (R)	PPNP25(b) (E)
(10.5)	-	?	+	+	+	-	-	-	?	+	+	+	+	+	+	-	-	?	+	+	-	-	-	-	-	-	-	?	?
(10.6)	+	+	+	+	+	+	+	+	?	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
11. To a	achieve	e susta	ainable	elevels	s of pr	osperit	ty and	econo	omic g	rowth a	and im	iprove	the vil	lage's	retail f	unctio	on												
(11.1)	0	0	?	?	0	0	+	+	+	0	0	0	?	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
(11.2)	+	+	?	?	+	+	+	+	+	+	+	+	?	?	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
(11.3)	0	0	+	+	0	0	+	?	?	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	?
12. To p	promote	e sust	ainabl	e trans	sport, \	walking	g and	cycling	g uptał	ke and	encou	urage	efficier	nt patte	erns of	move	ment												
(12.1)	+	+	++	+	+	+	+	+	+	++	++	+	++	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+	+
(12.2)	-	-	?	+	+	-	+	-	+	+	+	+	?	+	+	-	-	?	-	-	-	-	-	-	-	?	+	+	+



# 7.2 The detailed assessment of Site Options

The following forms represent the detailed assessment of the Plan's reasonable site options. In each instance, options have been assessed alongside commentary as to the nature or each assessed impact, with additional considerations as to whether any impacts could be mitigated or avoided at different development quanta / land-take sizes.

## 7.2.1 Site PPNP01 - West Glebe Field

SEA Objective / Key Criteria	Effect PPNP01(a)	Effect PPNP01(b)
1. To improve the health of the population overall and reduce health inequalities		
(1.1) Will the site see a loss of land classified as 'open space'?		
(1.2) Might the site be located on contaminated land?	+	+

Commentary: The site is undeveloped and is proposed for designation as 'Local Green Space' within Policy 14 of the Neighbourhood Plan, as supported by the Plan's 'Local Green Spaces Study'. The extent of the site is such that there would be a loss of open space with no likely compensation of an equivalent size of quality. There are no known contaminants on site that can be assumed through any previous land use.

Can effects be mitigated (?): The effects of a loss of open space can not be mitigated, although open space contributions would likely be sought by the LPA to ensure off-site provision. Suitable policy outlining such requirements is included at the District level, and no such recommendations are put forward for the Neighbourhood Plan within this SEA.

#### 2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure

(2.1) Accessibility to local education facilities	+	+
(2.2) Accessibility to local healthcare services	+	+
(2.3) Accessibility to both retail and service provision for day to day needs	+	+
(2.4) Accessibility to local employment opportunities	+	+
(2.5) Fibre broadband availability	++	++
(2.6) Distance to main employment areas	++	++

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. The site is within 800 metres from a Tesco Metro and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 metres of a main employment area (Pulborough Station Approach). Fibre or wireless broadband is available in the broad area.



SEA Objective / Key Criteria	Effect	Effect
	PPNP01(a)	PPNP01(b)

Can effects be mitigated (?): No negative effects regarding accessibility to services and facilities have been identified that would require mitigation.

#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

#### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is over 100 metres from the nearest water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): No negative effects regarding water quality have been identified that would require mitigation.

#### 5. To maintain and where possible improve air and noise quality

(5.1) Would the site experience noise / is it in close proximity to road traffic or the railway?

(5.2) Is the site within proximity to mineral extraction or waste management facilities?

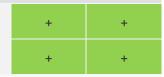
Commentary: The site is not within an area identified as experiencing road traffic noise at 55 decibels or more. The site is however within an area that experiences rail noise at between 55-64.9 decibels due to the presence of the railway line to the west of the site. Both options have been identified as having the some uncertainty regarding possible negative effects in this regard. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Area (including a 250m buffer) for 'Building Stone.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

7. To reduce vulnerability and increase resilience to extreme weather events and flooding.



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SEA Objective / Key Criteria	Effect PPNP01(a)	Effect PPNP01(b)
(7.1) Is the site within Flood Risk Zone 2 or 3?	++	++
(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?	?	?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The site contains small areas of a low and medium risk from surface water flood risk scattered throughout, with an area of high risk at the site's western boundary.

Can effects be mitigated (?): Effects can be suitably mitigated through seeking appropriate SuDS on site.

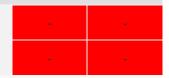
8. To conserve and enhance biodiversity and geodiversity		
(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	+	?
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+	+
(8.4) Is the site within a Bat Sustenance Zone	+	+

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for proposals of less than dwellings to be consulted upon with Natural England in this location. This ensures that PPNP01(a) will have positive effects at a dwelling yield of 8, however PPNP01(b) will require consultation at 46 dwellings and the uncertain effect highlight indicates that negative effects can not be ruled out. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is not within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): Effects on Habitats Sites can be mitigated through either on site requirements, conditions or through necessary planning contributions. Specific effects are identified at the Plan level (through the accompanying HRA / AA to the Neighbourhood Plan) and mitigated through policy requirements, and / or at the project level through further detailed HRA / AA work. Relevant to the Neighbourhood Plan, effects on Habitats Sites are more appropriately identified through the Plan's HRA / AA and any recommendations regarding mitigation made within that report.

#### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets



(9.2) Might the site have an impact on an area known for its archaeological value.

Commentary: The site is within a Conservation Area and is in close proximity to the Grade I listed Church of St Mary to the east, and also numerous Grade II listed buildings to the north. Negative effects have been highlighted at this strategic



SEA Objective / Key Criteria	Effect	Effect
	PPNP01(a)	PPNP01(b)

stage. The site is located in an area with the potential for archaeological deposits associated with the Pulborough Historic Core Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

# 10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	0	0
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++	++
(10.3) Is the site greenfield or brownfield?	-	-
(10.4) Is the site within Development Limits?	+	+
(10.5) Landscape capacity assessment	+	+
(10.6) Is the site within proximity to South Downs National Park?	+	+

Commentary: The site is within an area outside the scope of the Horsham Landscape Character Assessment (2003). The site is on greenfield land. No trees that have Tree Preservation Orders exist on site. The site is adjacent to the existing settlement boundary and is well related to the existing settlement. The site is located within an area outside the scope of the Landscape Capacity Assessment and so can be expected to have a positive (i.e. 'no') effect on landscape if developed. The site is also distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated.

11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function		
(11.1) Is the site proposed for employment development / loss of employment land?	0	0
(11.2) Will there be a loss of employment land (housing allocations)	+	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0	0
Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.		

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

#### 12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement



SEA Objective / Key Criteria	Effect PPNP01(a)	Effect PPNP01(b)
(12.1) Accessibility to public transport options	++	++
(12.2) Accessibility issue raised in Site Assessment Report 2019	+	+

Commentary: The site is within 800m of both the train station and a bus stop, ensuring significant positive effects. The site has no known issues regarding access to the existing road network, however access to the site may be considered an issue subject to the details of any proposed scheme.

Can effects be mitigated (?): No effects have been identified regarding access and sustainable transport that require mitigation.

# 7.2.2 Site PPNP03 - Police station

SEA Objective / Key Criteria	Effect	
1. To improve the health of the population overall and reduce health inequalities		
(1.1) Will the site see a loss of land classified as 'open space'?	0	
(1.2) Might the site be located on contaminated land?	+	
Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.		
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.		
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure		
(2.1) Accessibility to local education facilities	+	
(2.2) Accessibility to local healthcare services	+	
(2.3) Accessibility to both retail and service provision for day to day needs	+	
(2.4) Accessibility to local employment opportunities	+	
(2.5) Fibre broadband availability	++	
(2.6) Distance to main employment areas	+	

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. The site is within 800 metres from a Tesco Metro and within 800 metres / 10 minutes walking distance from local employment



Effect

#### SEA Objective / Key Criteria

opportunities. The site is within 500 – 1,000 metres of a main employment area (Pulborough Station Approach). Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): No effects regarding access to services and facilities have been identified that would require mitigation.

#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

4. To ensure no deterioration of water quality	
(4.1) Proximity of any water bodies	?
(4.2) Is the site within a ground water source protection zone?	+

Commentary: The site is within 10 metres from the nearest water body: a culverted stream. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): No negative effects regarding water quality have been identified that would require mitigation.

5. To maintain and where possible improve air and noise quality	
(5.1) Would the site experience noise / is it in close proximity to road traffic?	-
(5.2) Is the site within proximity to mineral extraction or waste management facilities?	+

Commentary: Although no rail noise has been identified on the site, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the east. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities, or any Minerals Safeguarding Area (as identified within the West Sussex Minerals Local Plan).

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

#### 7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

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SEA Objective / Key Criteria	Effect
(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?	?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The site contains areas of a medium risk from surface water flooding, with an area of a high risk adjacent to the site.

Can effects be mitigated (?): Effects can be suitably mitigated through seeking appropriate SuDS on site.

8. To conserve and enhance biodiversity and geodiversity	
(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	+
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+
(8.4) Is the site within a Bat Sustenance Zone	-

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yield specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): The Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets



(9.2) Might the site have an impact on an area known for its archaeological value.

Commentary: The site is within a Conservation Area and in relatively close proximity to the Grade I listed Church of St Mary to the south, and also numerous Grade II listed buildings to the south. Potentially significant negative effects have been highlighted at this strategic stage. The site is located in an area with the potential for archaeological deposits associated with the Pulborough Historic Core Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.



Effect

#### SEA Objective / Key Criteria

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	0
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++
(10.3) Is the site greenfield or brownfield?	++
(10.4) Is the site within Development Limits?	++
(10.5) Landscape capacity assessment	+
(10.6) Is the site within proximity to South Downs National Park?	+

Commentary: The site is within an area outside the scope of the Horsham Landscape Character Assessment (2003). The site is located within the settlement boundary and is entirely brownfield land. No trees that have Tree Preservation Orders exist on site. The site is located within an area outside the scope of the Landscape Capacity Assessment and so can be expected to have a positive (i.e. 'no') effect on landscape if developed. The site is also distanced from the South Downs National Park boundary.

Can effects be mitigated (?): No effects regarding landscapes have been identified that would require mitigation.

#### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0

Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options	+
(12.2) Accessibility issue raised in Site Assessment Report 2019	+

Commentary: The site is within 800m of a bus stop, but is distanced just beyond 800m from the train station. There will be minor positive effects as a result. The site has no known issues regarding access to the existing road network.

Can effects be mitigated (?): No effects have been identified regarding access and sustainable transport that require mitigation.



# 7.2.3 Site PPNP05 – Station Approach

SEA Objective / Key Criteria	Effect PPNP05(a)	Effect PPNP05(b)
1. To improve the health of the population overall and reduce health inequalities		
(1.1) Will the site see a loss of land classified as 'open space'?	0	0
(1.2) Might the site be located on contaminated land?	?	?
Commentary: The site would see no net loss of publicly accessible designated open space. There is the potential for contamination on site due to the site's previous land use.		
Can effects be mitigated (?): Contaminated land can be remediated subject to suitable planning conditions, should any forthcoming investigation / assessment at the planning application stage identify contamination on site.		

#### 2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure

(2.1) Accessibility to local education facilities	+	+
(2.2) Accessibility to local healthcare services	+	+
(2.3) Accessibility to both retail and service provision for day to day needs	+	+
(2.4) Accessibility to local employment opportunities	+	+
(2.5) Fibre broadband availability	++	++
(2.6) Distance to main employment areas	++	++

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres) via the Cinder Path, and a GP surgery is also located within this distance from the site. The site is within 800 metres from a Tesco Metro and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 metres of a main employment area (Pulborough Station Approach). Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): Effects regarding poor access to local educational facilities can not be mitigated at the scale of development proposed under either option.

#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

?

?

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SEA Objective / Key Criteria	Effect PPNP05(a)	Effect PPNP05(b)
(4.2) Is the site within a ground water source protection zone?	?	?

Commentary: The site is between 50 - 100 metres from a river to the south; however buildings exist between the site and the water body and the site is some 9 metres higher than the river. The site is within groundwater Source Protection Zone 'Zone III – Total Catchment.' This is the area around a supply source within which all the groundwater ends up at the abstraction point and is the point from where the water is taken. This area needs protecting from potential pollutants.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. Residential land uses are not considered to give rise to ground water pollutants (e.g. give rise to hazardous substances such as pesticides, oils, petrol and diesel, solvents, arsenic, mercury or chromium VI; or non-hazardous substances such as ammonia or nitrates), however consultation with the Environment Agency would be recommended at the application stage should this site come forward for development.

(5.1) Would the site experience noise / is it in close proximity to road traffic?	?	?
(5.2) Is the site within proximity to mineral extraction or waste management facilities?	+	+

Commentary: The site is not within an area identified as experiencing road traffic noise at 55 decibels or more. The site is however within an area that experiences rail noise at between 55-64.9 decibels due to the presence of the railway line to the west of the site. Both options have been identified as having the some uncertainty regarding possible negative effects in this regard. The site is not within close proximity to any mineral extraction or waste management facilities, or any Minerals Safeguarding Area (as identified within the West Sussex Minerals Local Plan).

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?	++	++
(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?	+	+

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The site contains areas of 'low' risk from surface water flooding in its northern part.

Can effects be mitigated (?): Effects can be suitably mitigated through seeking appropriate SuDS on site.

+

+



SEA Objective / Key Criteria	Effect PPNP05(a)	Effect PPNP05(b)
8. To conserve and enhance biodiversity and geodiversity		
(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	+	+
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+	+
(8.4) Is the site within a Bat Sustenance Zone	-	-

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yields specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): The Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

#### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets

(9.2) Might the site have an impact on an area known for its archaeological value.

Commentary: The site is adjacent to the Conservation Area however is not in close proximity to any listed buildings. As such, positive effects have been highlighted at this stage where it is considered that any potential effects could be mitigated. The site is not within an Archaeological Notification Area.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	0	0
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++	++
(10.3) Is the site greenfield or brownfield?	++	++
(10.4) Is the site within Development Limits?	++	++

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SEA Objective / Key Criteria	Effect PPNP05(a)	Effect PPNP05(b)
(10.5) Landscape capacity assessment	+	+
(10.6) Is the site within proximity to South Downs National Park?	+	+

Commentary: The site is within an area outside the scope of the Horsham Landscape Character Assessment (2003). The site is located within the settlement boundary and is entirely brownfield land. No trees that have Tree Preservation Orders exist on site. The site is located within an area outside the scope of the Landscape Capacity Assessment and so can be expected to have a positive (i.e. 'no') effect on landscape if developed. The site is also distanced from the South Downs National Park boundary.

Can effects be mitigated (?): No effects regarding landscape have been identified that would require mitigation.

11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	?	?
(11.2) Will there be a loss of employment land (housing allocations)	?	?
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	+	+

Commentary: The site is currently employment land, and is proposed for mixed use development. At present, it is uncertain whether the proposal would lead to a net loss of employment land overall. Positive effects are highlighted however for the retention / inclusion of an employment element of development within the existing settlement boundary / a sustainable location.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options	++	++
(12.2) Accessibility issue raised in Site Assessment Report 2019	?	?

Commentary: The site is within 800m of both the train station and a bus stop, ensuring significant positive effects. The Site Assessment Report has identified a potential issue surrounding traffic / accessibility.

Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).



## 7.2.4 Site PPNP06 – Harwoods Land Rover Bentley

SEA Objective / Key Criteria	Effect PPNP06(a)	Effect PPNP06(b)
1. To improve the health of the population overall and reduce health inequalities		
(1.1) Will the site see a loss of land classified as 'open space'?	0	0
(1.2) Might the site be located on contaminated land?	?	?
Commentary: The site would see no net loss of publicly accessible designated open space. There is the potential for contamination on site due to the site's previous land use.		
Can effects be mitigated (?): Contaminated land can be remediated subject to suitable planning conditions, should any forthcoming investigation / assessment at the planning application stage identify contamination on site.		

#### 2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure

(2.1) Accessibility to local education facilities	+	+
(2.2) Accessibility to local healthcare services	+	+
(2.3) Accessibility to both retail and service provision for day to day needs	+	+
(2.4) Accessibility to local employment opportunities	+	+
(2.5) Fibre broadband availability	++	++
(2.6) Distance to main employment areas	+	+

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. The site is within 800 metres from a Tesco Metro and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 – 1,000 metres of a main employment area (Pulborough Station Approach). Fibre or wireless broadband is available in the broad area.

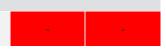
Can effects be mitigated (?): No effects regarding access to services and facilities have been identified that would require mitigation.

#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies



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SEA Objective / Key Criteria	Effect PPNP06(a)	Effect PPNP06(b)
(4.2) Is the site within a ground water source protection zone?	+	+

Commentary: The site is within 50 metres / adjacent to a small water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The negative effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies adjacent to the site, should any detailed issue be forthcoming, at the design stage.

#### 5. To maintain and where possible improve air and noise quality

(5.1) Would the site experience noise / is it in close proximity to road traffic?

(5.2) Is the site within proximity to mineral extraction or waste management facilities?

Commentary: Although no rail noise has been identified on the site, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the west. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities, or any Minerals Safeguarding Area (as identified within the West Sussex Minerals Local Plan).

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

#### 6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

#### 7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?	++	++
(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?	-	-

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. Although the site is predominantly of a low risk from surface water flooding, an area of high risk exists within the northern half of the site.

Can effects be mitigated (?): Effects can be suitably mitigated through seeking appropriate SuDS on site.

#### 8. To conserve and enhance biodiversity and geodiversity

(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)



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SEA Objective / Key Criteria	Effect	Effect
	PPNP06(a)	PPNP06(b)
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+	+
(8.4) Is the site within a Bat Sustenance Zone	-	-

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yields specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): The Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

#### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets	++	++
(9.2) Might the site have an impact on an area known for its archaeological value	+	+

Commentary: The site is outside the Conservation Area and is not in close proximity to any listed buildings. The site is not within an Archaeological Notification Area.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	0	0
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	-	-
(10.3) Is the site greenfield or brownfield?	+	+
(10.4) Is the site within Development Limits?	++	++
(10.5) Landscape capacity assessment	+	+



SEA Objective / Key Criteria	Effect	Effect
	PPNP06(a)	PPNP06(b)
Commentary: The site is within an area outside the scope of the Horsham Landscape Charac	ter Assessmer	nt (2003).
The site is located within the settlement boundary and is predominantly brownfield land. The	site is within a l	arge Tree

Preservation Area. The site is located within an area outside the scope of the Landscape Capacity Assessment and so can be expected to have a positive (i.e. 'no') effect on landscape if developed. The site is also distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The retention of trees on site can in theory be ensured through an appropriate scheme at a lower density, which is ensured through option PPNP06(a) for 15 dwellings. The higher yield option, at 39 dwellings (reflecting a 30 dwelling per hectare calculation) can be considered to require the removal of the TPOs in order to deliver the stated dwelling quantum. It is not considered that option PPNP06(b) would be able to mitigate effects through the retention of TPOs in their entirety.

#### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	?	?
(11.2) Will there be a loss of employment land (housing allocations)	?	?
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	+	+

Commentary: The site is currently employment land, and is proposed for mixed use development. At present, it is uncertain whether the proposal would lead to a net loss of employment land overall. Positive effects are highlighted however for the retention / inclusion of an employment element of development within the existing settlement boundary / a sustainable location.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

#### 12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options	+	+	
(12.2) Accessibility issue raised in Site Assessment Report 2019	+	+	

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has no known issues regarding access to the existing road network.

Can effects be mitigated (?): No effects have been identified regarding access and sustainable transport that require mitigation.



# 7.2.5 Site PPNP07 – Land rear of 23-35 London Road

SEA Objective / Key Criteria	Effect
1. To improve the health of the population overall and reduce health inequalities	
(1.1) Will the site see a loss of land classified as 'open space'?	0
(1.2) Might the site be located on contaminated land?	+
Commentary: The site would see no net loss of publicly accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.	1
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.	
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	
(2.1) Accessibility to local education facilities	+
(2.2) Accessibility to local healthcare services	+
(2.3) Accessibility to both retail and service provision for day to day needs	+
(2.4) Accessibility to local employment opportunities	+
(2.5) Fibre broadband availability	++
(2.6) Distance to main employment areas	+

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. The site is within 800 metres from a Tesco Metro and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 – 1,000 metres of a main employment area (Pulborough Station Approach). Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): No effects regarding access to services and facilities have been identified that would require mitigation.

#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

4. To ensure no deterioration of water quality	
(4.1) Proximity of any water bodies	?
(4.2) Is the site within a ground water source protection zone?	+



#### SEA Objective / Key Criteria

Commentary: The site is between 50 – 100 metres from a small water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The uncertain effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies near to the site, should any detailed issue be forthcoming, at the design stage.

5. To maintain and where possible improve air and noise quality	
(5.1) Would the site experience noise / is it in close proximity to road traffic?	-
(5.2) Is the site within proximity to mineral extraction or waste management facilities?	+

Commentary: Rail noise has been identified on the site at 55-64.9 decibels. Additionally, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the east. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities, or any Minerals Safeguarding Area (as identified within the West Sussex Minerals Local Plan).

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

#### 6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

#### 7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The site is also within an area of very low risk from surface water flooding.

Can effects be mitigated (?): No effects are highlighted regarding flood risk that requires mitigation.

8. To conserve and enhance biodiversity and geodiversity	
(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	+
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+

Effect

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SEA Objective / Key Criteria	Effect
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+
(8.4) Is the site within a Bat Sustenance Zone	-

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yield specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): The Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

#### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets	
(9.2) Might the site have an impact on an area known for its archaeological value.	+

Commentary: The site is outside the Conservation Area and is not in close proximity to any listed buildings. The site is not within an Archaeological Notification Area.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

# 10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	0
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	?
(10.3) Is the site greenfield or brownfield?	+
(10.4) Is the site within Development Limits?	++
(10.5) Landscape capacity assessment	+

Commentary: The site is within an area outside the scope of the Horsham Landscape Character Assessment (2003). Several trees with Tree Preservation Orders exist on the site, however their retention may be possible as part of any forthcoming scheme. The site is located within the settlement boundary and represents a mix of brownfield and greenfield land. The site is located within an area outside the scope of the Landscape Capacity Assessment and so can be expected



# SEA Objective / Key Criteria Effect to have a positive (i.e. 'no') effect on landscape if developed. The site is also distanced from the South Downs National Park boundary. Can effects be mitigated (?): It is considered that the TPO present on the site can be successfully integrated into any scheme which may be forthcoming on the site. 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function 0 (11.1) Is the site proposed for employment development / loss of employment land? (11.2) Will there be a loss of employment land (housing allocations) 0 (11.3) Will the proposal increase rural employment opportunities in a sustainable location? Commentary: The site is proposed for housing and would not lead to any loss of existing employment land. Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation. 12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement (12.1) Accessibility to public transport options + + (12.2) Accessibility issue raised in Site Assessment Report 2019

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has no known issues regarding access to the existing road network.

Can effects be mitigated (?): No effects have been identified regarding access and sustainable transport that require mitigation.

## 7.2.6 Site PPNP08 – 46 London Road

SEA Objective / Key Criteria	Effect	
1. To improve the health of the population overall and reduce health inequalities		
(1.1) Will the site see a loss of land classified as 'open space'?	0	
(1.2) Might the site be located on contaminated land?	+	
Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.		
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.		



# SEA Objective / Key CriteriaEffect2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure(2.1) Accessibility to local education facilities+(2.2) Accessibility to local healthcare services+(2.3) Accessibility to both retail and service provision for day to day needs+(2.4) Accessibility to local employment opportunities+(2.5) Fibre broadband availability++(2.6) Distance to main employment areas+

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. The site is within 800 metres from a Tesco Metro and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 – 1,000 metres of a main employment area (Pulborough Station Approach). Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): No effects regarding access to services and facilities have been identified that would require mitigation.

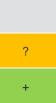
#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

#### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?



Commentary: The site is between 50 – 100 metres from a small water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The uncertain effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies adjacent to the site, should any detailed issue be forthcoming, at the design stage.

#### 5. To maintain and where possible improve air and noise quality

(5.1) Would the site experience noise / is it in close proximity to road traffic?

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#### SEA Objective / Key Criteria

(5.2) Is the site within proximity to mineral extraction or waste management facilities?

Commentary: Rail noise has been identified on the site at 55-64.9 decibels. Additionally, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the east. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities, or any Minerals Safeguarding Area (as identified within the West Sussex Minerals Local Plan).

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

#### 6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

#### 7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The site is also within an area of very low risk from surface water flooding.

Can effects be mitigated (?): No effects are highlighted regarding flood risk that requires mitigation.

#### 8. To conserve and enhance biodiversity and geodiversity

(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)

(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.

(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites

(8.4) Is the site within a Bat Sustenance Zone

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yield specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): The Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for



Effect

#### SEA Objective / Key Criteria

biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets	++
(9.2) Might the site have an impact on an area known for its archaeological value.	+

Commentary: The site is outside the Conservation Area and is not in close proximity to any listed buildings. The site is not within an Archaeological Notification Area.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	0
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++
(10.3) Is the site greenfield or brownfield?	-
(10.4) Is the site within Development Limits?	++
(10.5) Landscape capacity assessment	+
(10.6) Is the site within proximity to South Downs National Park?	+

Commentary: The site is within an area outside the scope of the Horsham Landscape Character Assessment (2003). The site is located within the settlement boundary and is greenfield land. No trees that have Tree Preservation Orders exist on site. The site is located within an area outside the scope of the Landscape Capacity Assessment and so can be expected to have a positive (i.e. 'no') effect on landscape if developed. The site is also distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated.

11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0

Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.

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#### SEA Objective / Key Criteria

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options

(12.2) Accessibility issue raised in Site Assessment Report 2019

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has no known issues regarding access to the existing road network.

Can effects be mitigated (?): No effects have been identified regarding access and sustainable transport that require mitigation.

# 7.2.7 Site PPNP09 / 10 – New Place Nurseries / Land adjacent to Drovers Lane

Effect PPNP09/10 (a)	Effect PPNP09/10 (b)	Effect PPNP09 (c)	Effect PPNP10 (d)	
1. To improve the health of the population overall and reduce health inequalities				
0	0	0	0	
+	+	+	+	
	PPNP09/10 (a) health inequa	PPNP09/10PPNP09/10(a)(b)health inequalities00	PPNP09/10         PPNP09/10         PPNP09           (a)         (b)         (c)           health inequalities         0         0	

Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on the sites that can be assumed through any previous land use.

Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.

2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure

(2.1) Accessibility to local education facilities	+	+	+	+
(2.2) Accessibility to local healthcare services	+	+	+	+
(2.3) Accessibility to both retail and service provision for day to day needs	?	?	?	-
(2.4) Accessibility to local employment opportunities	+	+	+	-
(2.5) Fibre broadband availability	++	++	++	++



SEA Objective / Key Criteria	Effect PPNP09/10	Effect PPNP09/10	Effect	Effect PPNP10
	(a)	(b)	(c)	(d)
(2.6) Distance to main employment areas	?	?	?	

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. Parts of those options PPNP090/10(a), PPNP09/10(b) and PPNP09(c) are within 800 metres from a supermarket, however a route within 10 minutes walking distance is not currently available. These options are however within 800 metres / 10 minutes walking distance from local employment opportunities however are between 1,000 – 1,500 metres from a main employment area at Pulborough Station Approach or Broomers Hill Park. Site PPNP10(d) in isolation is not within 10 minute walking distance from any supermarket or convenience shop or local employment opportunities and is also over 1,500 metres from a main employment area. Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): Accessibility in regards to walking distances to retail services and employment can not be mitigated within a residential scheme. A successful scheme can however ensure that public realm improvements are ensured, alongside pedestrian and cycle way improvements and that access is as safe and convenient as possible.

#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

4. To ensure no deterioration of water quality				
(4.1) Proximity of any water bodies	-	-	-	++
(4.2) Is the site within a ground water source protection zone?	+	+	+	+

Commentary: Site PPNP09 includes a water body, and those options that include PPNP09 have been identified as having the potential for negative effects on water quality as a result. Site PPNP10 (option (d) only) is however over 200 metres from the nearest water body. The sites are not within a groundwater Source Protection Zone.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The negative effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies adjacent to the site, should any detailed issue be forthcoming, at the design stage.

5. To maintain and where possible improve air and noise quality





SEA Objective / Key Criteria	Effect	Effect	Effect	Effect
	PPNP09/10	PPNP09/10	PPNP09	PPNP10
	(a)	(b)	(c)	(d)

Commentary: Rail noise has been identified on site PPNP09 at 55-64.9 decibels. Additionally, site PPNP09 has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the east. Negative effects have therefore been identified for those options that include this land. Site PPNP10 has no identified effects regarding road traffic or rail noise in isolation. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Area (including a 250m buffer) for 'Building Stone.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

#### 6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

#### 7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?	++	++	++	++
(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?	-	-	-	++

Commentary: The sites are wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. Site PPN10 similarly does not contain any areas of surface water flood risk (very low). Site PPNP09 however contains areas of high and medium surface water flood risk towards the site's western boundary and in the north of the site, resulting in minor negative effects.

Can effects be mitigated (?): Effects can be mitigated through the successful integration of SuDS on site.

#### 8. To conserve and enhance biodiversity and geodiversity

(8.1) Is the site within the ZOI of a Habitats  ${\rm Site}(s)$  or the IRZ of a  ${\rm SSSI}(s)$ 

(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.

(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites

(8.4) Is the site within a Bat Sustenance Zone

f	?	?	?	?
	+	+	+	+
	+	+	+	+
	+	+	+	+



SEA Objective / Key Criteria	Effect	Effect	Effect	Effect
	PPNP09/10	PPNP09/10	PPNP09	PPNP10
	(a)	(b)	(c)	(d)

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, and all options require consultation with Natural England in this location. This is due to the options all having yield of over 100 dwellings. Uncertain effects are highlighted at this stage however it should be acknowledged that negative effects can not be ruled out. The sites are not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The sites are not within a Bat Sustenance Zone. The sites are also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): Effects on Habitats Sites can be mitigated through either on site requirements, conditions or through necessary planning contributions. Specific effects are identified at the Plan level (through the accompanying HRA / AA to the Neighbourhood Plan) and mitigated through policy requirements, and / or at the project level through further detailed HRA / AA work. Relevant to the Neighbourhood Plan, effects on Habitats Sites are more appropriately identified through the Plan's HRA / AA and any recommendations regarding mitigation made within that report.

#### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets



(9.2) Might the site have an impact on an area known for its archaeological value.

Commentary: Site PPNP09 surrounds the Grade II\* listed New Place Manor, and also the Grade II listed Archway and Garden Wall and New Place Manor to the South East of the House. Uncertain effects are highlighted at this strategic stage in regard to the potential for harm to the setting of these listed structures; the wider site is large and mitigation may be possible or effects otherwise avoided. Site PPNP10 in isolation however is suitably distanced from these listings. The sites are partly located in an area with the potential for archaeological deposits associated with a Large Roman Settlement Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

# 10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park





SEA Objective / Key Criteria	Effect PPNP09/10 (a)	Effect PPNP09/10 (b)	Effect PPNP09 (c)	Effect PPNP10 (d)
(10.3) Is the site greenfield or brownfield?	-	-	-	-
(10.4) Is the site within Development Limits?	+	+	+	+
(10.5) Landscape capacity assessment	-	-	-	?
(10.6) Is the site within proximity to South Downs National Park?	+	+	+	+

Commentary: The sites are within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). The sites are both located adjacent to the existing settlement boundary and such are relatively well related to the existing settlement. No trees that have Tree Preservation Orders exist on the sites. They are both on greenfield land. The most western part of site PPNP09 is within an area identified as having no-low capacity within the Landscape Capacity Assessment. Site PPNP10 is entirely within an area identified as having low-moderate capacity. There can be expected to be negative to uncertain effects as a result. The site is distanced from the South Downs National Park boundary however wider landscape concerns may lead to issues regarding views from the National Park due to the scale of proposed development.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design and layout considerations can be ensured, as well as open space and landscaping requirements on site. To this effect any successful scheme on the site could likely be made suitable in planning terms.

#### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0	0	0	0
(11.2) Will there be a loss of employment land (housing allocations)	+	+	+	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0	0	0	0

Commentary: The sites are proposed for housing and would not lead to any loss of existing employment land.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options	+	+	+	+
(12.2) Accessibility issue raised in Site Assessment Report 2019	-	-	-	?

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SEA Objective / Key Criteria	Effect	Effect	Effect	Effect
	PPNP09/10	PPNP09/10	PPNP09	PPNP10
	(a)	(b)	(c)	(d)

Commentary: The sites are within 800m of a bus stop, but distanced from the train station. There will be minor positive effects as a result for all options. Site PPNP09 has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019). Site PPNP10 however has a higher degree of uncertainty surrounding highways, and the Site Assessment Report 2019 notes that previous planning applications have not identified highways issues.

Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

# 7.2.8 Site PPNP11 - Land off Glebelands

SEA Objective / Key Criteria	Effect		
1. To improve the health of the population overall and reduce health inequalities			
(1.1) Will the site see a loss of land classified as 'open space'?	0		
(1.2) Might the site be located on contaminated land?	+		
Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.			
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.			
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure			
(2.1) Accessibility to local education facilities	+		
(2.2) Accessibility to local healthcare services	+		
(2.3) Accessibility to both retail and service provision for day to day needs	+		
(2.4) Accessibility to local employment opportunities	+		
(2.5) Fibre broadband availability	++		
(2.6) Distance to main employment areas			

Strategic Environmental Assessment: Environmental Report



#### SEA Objective / Key Criteria

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. The site is 800 metres from Pulborough Stores (convenience shop) and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is over 1,500 metres from a main employment area. Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): The site is distanced from a main employment area, and effects regarding accessibility in this regard can not be mitigated through a residential led scheme.

3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

#### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is over 200 metres from the nearest water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): No negative effects regarding water quality have been identified that would require mitigation.

5. To maintain and where possible improve air and noise quality	
(5.1) Would the site experience noise / is it in close proximity to road traffic?	+
(5.2) Is the site within proximity to mineral extraction or waste management facilities?	?

Commentary: The site has not been identified as experiencing road traffic or rail noise at 55-70+ decibels. There will be positive effects in this regard. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Area (including a 250m buffer) for 'Building Stone.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): The site is located within a Minerals Safeguarding Area. Subject to consultation with West Sussex CC, as the Minerals Planning Authority, this is not considered a barrier to development that would lead to any negative effects on the environment. No mitigation would therefore be required through any scheme.

#### 6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

#### Effect

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### SEA Objective / Key Criteria Effect 7. To reduce vulnerability and increase resilience to extreme weather events and flooding. (7.1) Is the site within Flood Risk Zone 2 or 3? ++ (7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water? ++ Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. Similarly no areas of the site are identified as at any risk from surface water flooding. Can effects be mitigated (?): No effects have been identified regarding flood risk that would require mitigation. 8. To conserve and enhance biodiversity and geodiversity ? (8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s) (8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland. + (8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County +

(8.4) Is the site within a Bat Sustenance Zone

**Geographical Sites** 

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, and will require consultation with Natural England. Consultation is required of residential development of 10 dwellings or more in this location. Uncertain effects are highlighted at this stage however it should be acknowledged that negative effects can not be ruled out. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is not within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): Effects on Habitats Sites can be mitigated through either on site requirements, conditions or through necessary planning contributions. Specific effects are identified at the Plan level (through the accompanying HRA / AA to the Neighbourhood Plan) and mitigated through policy requirements, and / or at the project level through further detailed HRA / AA work. Relevant to the Neighbourhood Plan, effects on Habitats Sites are more appropriately identified through the Plan's HRA / AA and any recommendations regarding mitigation made within that report.

#### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets	++
(9.2) Might the site have an impact on an area known for its archaeological value.	-

Commentary: The site is suitably distanced from any listed structures / heritage assets. The site is located in an area with the potential for archaeological deposits associated with a Large Roman Settlement Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the



strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	?
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++
(10.3) Is the site greenfield or brownfield?	
(10.4) Is the site within Development Limits?	+
(10.5) Landscape capacity assessment	?
(10.6) Is the site within proximity to South Downs National Park?	+

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). No trees that have Tree Preservation Orders exist on site. The site is located adjacent to the existing settlement boundary and represents greenfield land. The site is entirely within an area identified as having low-moderate capacity. There can be expected to be uncertain effects as a result. The site is however distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design and layout considerations can be ensured, as well as open space and landscaping requirements on site. To this effect any successful scheme on the site could likely be made suitable in planning terms.

11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0
Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.	

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options

Strategic Environmental Assessment: Environmental Report



Effect

### SEA Objective / Key Criteria

(12.2) Accessibility issue raised in Site Assessment Report 2019

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).

Can effects be mitigated (?):The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

### 7.2.9 Site PPNP13 - East Glebe Field

SEA Objective / Key Criteria	Effect
1. To improve the health of the population overall and reduce health inequalities	
(1.1) Will the site see a loss of land classified as 'open space'?	
(1.2) Might the site be located on contaminated land?	+

Commentary: The site is undeveloped and is proposed for designation as 'Local Green Space' within Policy 14 of the Neighbourhood Plan, as supported by the Plan's 'Local Green Spaces Study'. The extent of the site is such that there would be a loss of open space with no likely compensation of an equivalent size of quality. There are no known contaminants on site that can be assumed through any previous land use.

Can effects be mitigated (?): The loss of open space through any development of this site would be permanent and irreversible. As such, without any conditions for off-site provision of an equitable size and quality that is also similarly accessible, mitigation would not be possible.

### 2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure

(2.1) Accessibility to local education facilities	+
(2.2) Accessibility to local healthcare services	+
(2.3) Accessibility to both retail and service provision for day to day needs	+
(2.4) Accessibility to local employment opportunities	+
(2.5) Fibre broadband availability	++

Strategic Environmental Assessment: Environmental Report



Effect

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### SEA Objective / Key Criteria

### (2.6) Distance to main employment areas

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. The site is 800 metres from Pulborough Stores (convenience shop) and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 metres of a main employment area (Pulborough Station Approach). Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): No effects regarding access to services and facilities have been identified that would require mitigation.

### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

### 4. To ensure no deterioration of water quality

- (4.1) Proximity of any water bodies
- (4.2) Is the site within a ground water source protection zone?

Commentary: The site is over 100 metres from the nearest water body. The site is within groundwater Source Protection Zone 'Zone III – Total Catchment.' This is the area around a supply source within which all the groundwater ends up at the abstraction point. This is the point from where the water is taken. This area needs protecting from potential pollutants. Consultation with the Environment Agency would be recommended at the application stage should this site come forward for development as proposed.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The uncertain effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies adjacent to the site, should any detailed issue be forthcoming, at the design stage.

### 5. To maintain and where possible improve air and noise quality (5.1) Would the site experience noise / is it in close proximity to road traffic? (5.2) Is the site within proximity to mineral extraction or waste management facilities?

Commentary: Although no rail noise has been identified on the site, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the west. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities, or any Minerals Safeguarding Area (as identified within the West Sussex Minerals Local Plan).

Strategic Environmental Assessment: Environmental Report



Effect

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### SEA Objective / Key Criteria

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The majority of the site is within an area of very low risk from surface water flooding; however a very small area within the southern part of the site is of a low risk.

Can effects be mitigated (?): Effects regarding surface water flooding can be mitigated through the successful integration of SuDS, however there are potential issues regarding landslip at the south end of the site.

8. To conserve and enhance biodiversity and geodiversity	
(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	?
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	?
(8.4) Is the site within a Bat Sustenance Zone	-

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, and will require consultation with Natural England. Consultation is required of residential development of 50 dwellings or more in this location. Uncertain effects are highlighted at this stage however it should be acknowledged that negative effects can not be ruled out. The site is within close proximity to the 'A29 Road Cutting' to the west, a Regionally Important Geological Site (RIGS). Development of the site could lead to harm through construction, and so uncertain effects are highlighted for information purposes. The site is within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): Effects on Habitats Sites can be mitigated through either on site requirements, conditions or through necessary planning contributions. Specific effects are identified at the Plan level (through the accompanying HRA / AA to the Neighbourhood Plan) and mitigated through policy requirements, and / or at the project level through further detailed HRA / AA work. Relevant to the Neighbourhood Plan, effects on Habitats Sites are more appropriately identified through the Plan's HRA / AA and any recommendations regarding mitigation made within that report. Regarding effects on protected bat species, the Horsham District Planning Framework identifies that within bat



sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets

(9.2) Might the site have an impact on an area known for its archaeological value.

Commentary: The site is within the Conservation Area, and borders the Grade II\* listed The Old House to the west and the Grade II\* listed The Rectory to the north. Additionally, a further three Grade II listed buildings border the site. Negative effects have been highlighted as a result. The site is not located within an Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

### 10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	0
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++
(10.3) Is the site greenfield or brownfield?	-
(10.4) Is the site within Development Limits?	++
(10.5) Landscape capacity assessment	+
(10.6) Is the site within proximity to South Downs National Park?	+

Commentary: The site is within an area outside the scope of the Horsham Landscape Character Assessment (2003). The site is located within the existing settlement boundary however represents development on greenfield land. No trees that have Tree Preservation Orders exist on site. The site is located within an area outside the scope of the Landscape Capacity Assessment and so can be expected to have a positive (i.e. 'no') effect on landscape if developed. The site is also distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated.

11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function



SEA Objective / Key Criteria	Effect
(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0
Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.	
Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.	
12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of	movement
(12.1) Accessibility to public transport options	++

Commentary: The site is within 800m of both the train station and a bus stop, ensuring significant positive effects. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).

Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

### 7.2.10 Site PPNP15 – 15 The Spinney

(12.2) Accessibility issue raised in Site Assessment Report 2019

SEA Objective / Key Criteria	Effect
1. To improve the health of the population overall and reduce health inequalities	
(1.1) Will the site see a loss of land classified as 'open space'?	0
(1.2) Might the site be located on contaminated land?	+
Commentary: The site would see no net loss of publically accessible designated open space. There are no k contaminants on site that can be assumed through any previous land use.	nown
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.	
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	e
(2.1) Accessibility to local education facilities	+



SEA Objective / Key Criteria	Effect
(2.2) Accessibility to local healthcare services	+
(2.3) Accessibility to both retail and service provision for day to day needs	+
(2.4) Accessibility to local employment opportunities	+
(2.5) Fibre broadband availability	++
(2.6) Distance to main employment areas	?

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. The site is 800 metres from Pulborough Stores (convenience shop) and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is between 1,000 – 1,500 metres from a main employment area (Pulborough Station Approach). Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): No effects regarding access to services and facilities have been identified that would require mitigation.

### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is over 200 metres from the nearest water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): No negative effects regarding water quality have been identified that would require mitigation.

### 5. To maintain and where possible improve air and noise quality

(5.1) Would the site experience noise / is it in close proximity to road traffic?

(5.2) Is the site within proximity to mineral extraction or waste management facilities?

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Commentary: The site has not been identified as experiencing road traffic or rail noise at 55-70+ decibels. There will be positive effects in this regard. The site is not within close proximity to any mineral extraction or waste management facilities, or any Minerals Safeguarding Area (as identified within the West Sussex Minerals Local Plan).



Effect

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### SEA Objective / Key Criteria

Can effects be mitigated (?): No effects regarding air or noise quality have been identified that would require mitigation.

### 6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

### 7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The entirety of the site is similarly at a very low risk from surface water flooding.

Can effects be mitigated (?): No effects are highlighted regarding flood risk that would require mitigation.

### 8. To conserve and enhance biodiversity and geodiversity

(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)

(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.

(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites

### (8.4) Is the site within a Bat Sustenance Zone

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yield specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): The Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets

(9.2) Might the site have an impact on an area known for its archaeological value.

Strategic Environmental Assessment: Environmental Report



### SEA Objective / Key Criteria

Commentary: The site is within relatively close proximity to a Scheduled Monument (a medieval moated site off Moat lane) to the north west; however numerous buildings exist between the site and this designation. Uncertain effects however are highlighted at this stage and pending the details of any specific scheme on site. The site is not located within an Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

### 10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	0
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++
(10.3) Is the site greenfield or brownfield?	?
(10.4) Is the site within Development Limits?	++
(10.5) Landscape capacity assessment	+
(10.6) Is the site within proximity to South Downs National Park?	+

Commentary: The site is within an area outside the scope of the Horsham Landscape Character Assessment (2003). The site is located within the existing settlement boundary and represents a mix of greenfield and brownfield land. No trees that have Tree Preservation Orders exist on site. The site is in an area not identified within the Landscape Capacity Assessment and it can be assumed that there would be positive (i.e. 'no') effects as a result. The site is distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land as a resource, however marginal, can not be mitigated.

### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0
Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.	

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.



Effect

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### SEA Objective / Key Criteria

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options

(12.2) Accessibility issue raised in Site Assessment Report 2019

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).

Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

### 7.2.11 Site PPNP16 – Pulborough Garden Centre

SEA Objective / Key Criteria	Effect
1. To improve the health of the population overall and reduce health inequalities	
(1.1) Will the site see a loss of land classified as 'open space'?	0
(1.2) Might the site be located on contaminated land?	+
Commentary: The site would see no net loss of publically accessible designated open space. There are no k contaminants on site that can be assumed through any previous land use.	nown
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.	
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	e
(2.1) Accessibility to local education facilities	N/A
(2.2) Accessibility to local healthcare services	N/A
(2.3) Accessibility to both retail and service provision for day to day needs	N/A
(2.4) Accessibility to local employment opportunities	N/A
(2.5) Fibre broadband availability	++
(2.6) Distance to main employment areas	N/A

Strategic Environmental Assessment: Environmental Report



### SEA Objective / Key Criteria

Commentary: The majority of the accessibility criteria are not considered applicable to sites that are proposed for employment development. Fibre or wireless broadband is however available in the broad area.

Can effects be mitigated (?): No effects regarding access to services or facilities have been identified that would require mitigation.

### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

4. To ensure no deterioration of water quality	
(4.1) Proximity of any water bodies	?
(4.2) Is the site within a ground water source protection zone?	?

Commentary: The site is between 50 – 100 metres from a small water body. The site is within groundwater Source Protection Zone 'Zone III – Total Catchment.' This is the area around a supply source within which all the groundwater ends up at the abstraction point. This is the point from where the water is taken. This area needs protecting from potential pollutants. Consultation with the Environment Agency would be recommended at the application stage should this site come forward for development as proposed.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. Residential land uses are not considered to give rise to ground water pollutants (e.g. give rise to hazardous substances such as pesticides, oils, petrol and diesel, solvents, arsenic, mercury or chromium VI; or non-hazardous substances such as ammonia or nitrates), however consultation with the Environment Agency would be recommended at the application stage should this site come forward for development. It is possible that the development proposal can successfully factor in the presence of any water bodies adjacent to the site, should any detailed issue be forthcoming, at the design stage.

5. To maintain and where possible improve air and noise quality	
(5.1) Would the site experience noise / is it in close proximity to road traffic?	+
(5.2) Is the site within proximity to mineral extraction or waste management facilities?	+

Commentary: The site has not been identified as experiencing road traffic or rail noise at 55-70+ decibels. There will be positive effects in this regard. The site is not within close proximity to any mineral extraction or waste management facilities, or any Minerals Safeguarding Area (as identified within the West Sussex Minerals Local Plan).

Can effects be mitigated (?): No effects regarding air or noise quality have been identified that would require mitigation.

6. To reduce emissions of greenhouse gases from energy consumption.

### Effect

Strategic Environmental Assessment: Environmental Report



Effect

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### SEA Objective / Key Criteria

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

### 7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The entirety of the site is similarly at a very low risk from surface water flooding.

Can effects be mitigated (?): No effects are highlighted regarding flood risk that would require mitigation.

### 8. To conserve and enhance biodiversity and geodiversity

(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)

(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.

(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites

(8.4) Is the site within a Bat Sustenance Zone

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for employment (non-residential) proposals to be consulted upon with Natural England in this location. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is not within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): No negative effects regarding biodiversity of geodiversity have been identified that would require mitigation.

### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets	?
(9.2) Might the site have an impact on an area known for its archaeological value.	+

Commentary: The site is adjacent to the Grade II listed Cokehurst to the west, and additionally in close proximity to the Grade II listed Coldharbour to the south east. Uncertain effects are highlighted at this strategic stage pending the specific details of any scheme on this site. The site is not located within an Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much



depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	-
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++
(10.3) Is the site greenfield or brownfield?	?
(10.4) Is the site within Development Limits?	
(10.5) Landscape capacity assessment	?
(10.6) Is the site within proximity to South Downs National Park?	?

Commentary: The site is within an area of 'high' sensitivity to change (development) within the Horsham Landscape Character Assessment (2003). The site is located in the open countryside and is not well related to the functional settlement of Pulborough. No trees that have Tree Preservation Orders exist on site. The site is a mix of greenfield and brownfield land. The site is distanced from the development boundary although this might be suitable for rural employment uses. There will be uncertain effects on landscape capacity as it is not included within the Landscape Capacity Assessment. Uncertain effects are highlighted in response and in consideration of the fact that the site is within the South Downs National Park.

Can effects be mitigated (?): The loss of greenfield land as a resource, however marginal, can not be mitigated. Effects more widely related to the site's location outside of the development boundary in the South Downs National Park, and the area's high landscape sensitivity would lead to the suitable mitigation of landscape concerns being unlikely.

11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	+
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	?

Commentary: The site is proposed for an extension of an existing employment use, which will lead to positive economic effects generally. Despite this, the location of the site outside development boundaries and in a rural location is such that there are uncertain effects in ensuring that rural employment growth is located sustainably.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options

Effect

Strategic Environmental Assessment: Environmental Report



Effect

+

### SEA Objective / Key Criteria

(12.2) Accessibility issue raised in Site Assessment Report 2019

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has no known issues regarding access to the existing road network.

Can effects be mitigated (?): No effects have been identified regarding access and sustainable transport that require mitigation.

### 7.2.12 Site PPNP17 – Land at Highfield

SEA Objective / Key Criteria	Effect	
1. To improve the health of the population overall and reduce health inequalities		
(1.1) Will the site see a loss of land classified as 'open space'?	0	
(1.2) Might the site be located on contaminated land?	+	
Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.		
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.		
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	e	
(2.1) Accessibility to local education facilities	+	
(2.2) Accessibility to local healthcare services	+	
(2.3) Accessibility to both retail and service provision for day to day needs	+	
(2.4) Accessibility to local employment opportunities	+	
(2.5) Fibre broadband availability	++	
(2.6) Distance to main employment areas	-	

Commentary: A primary school is accessible within 10 minutes walking distance (800 metres), as is a GP surgery. The site is within 800 metres from a Tesco Metro and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is over 1,500 metres from a main employment area. Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): Mitigation regarding access to a main employment area, in terms of walking and cycling distances, is not considered possible.

Strategic Environmental Assessment: Environmental Report



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### SEA Objective / Key Criteria

### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is between 50 – 100 metres from a small water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The uncertain effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies near to to the site, should any detailed issue be forthcoming, at the design stage.

5. To maintain and where possible improve air and noise quality	
(5.1) Would the site experience noise / is it in close proximity to road traffic?	
(5.2) Is the site within proximity to mineral extraction or waste management facilities?	?

Commentary: Rail noise has been identified as an issue on the site and the site has also been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the west. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Area (including a 250m buffer) for 'Building Stone.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

Strategic Environmental Assessment: Environmental Report



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### SEA Objective / Key Criteria

(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The entirety of the site is similarly at a very low risk from surface water flooding.

Can effects be mitigated (?): No effects are highlighted regarding flood risk that would require mitigation.

### 8. To conserve and enhance biodiversity and geodiversity

(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)

(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.

(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites

(8.4) Is the site within a Bat Sustenance Zone

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yield specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is not within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): No negative effects regarding biodiversity of geodiversity have been identified that would require mitigation.

### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets

(9.2) Might the site have an impact on an area known for its archaeological value.

Commentary: The site is suitably distanced from any listed structures or other heritage assets. The site is located within an area identified as having potential archaeological deposits associated with Stane Street Roman Road Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park



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### SEA Objective / Key Criteria

(10.1) Is the site in an area noted for its high sensitivity to change?
(10.2) Will any Tree Preservation Orders (TPOs) be affected?
(10.3) Is the site greenfield or brownfield?
(10.4) Is the site within Development Limits?
(10.5) Landscape capacity assessment

(10.6) Is the site within proximity to South Downs National Park?

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). No trees that have Tree Preservation Orders exist on site. The site is located largely outside the existing settlement boundary, but borders an area of land committed for development that is adjacent to the settlement boundary. The site is greenfield land. As such, uncertain effects are identified to reflect the landscape capacity of the site. The site is entirely within an area identified as having no-low capacity as identified within the Landscape Character Assessment. There can be expected to be negative effects as a result of any development of the site. The site is distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design and layout considerations can be ensured, as well as open space and landscaping requirements on site. To this effect any successful scheme on the site could likely be made suitable in planning terms.

### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0

Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options

(12.2) Accessibility issue raised in Site Assessment Report 2019

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).

Strategic Environmental Assessment: Environmental Report



### SEA Objective / Key Criteria

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Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

### 7.2.13 Site PPNP18 – Coombelands Equestrian Site 1

SEA Objective / Key Criteria	Effect		
1. To improve the health of the population overall and reduce health inequalities			
(1.1) Will the site see a loss of land classified as 'open space'?	0		
(1.2) Might the site be located on contaminated land?	+		
Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.			
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.			
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure			
(2.1) Accessibility to local education facilities			
(2.2) Accessibility to local healthcare services	-		
(2.3) Accessibility to both retail and service provision for day to day needs	+		
(2.4) Accessibility to local employment opportunities	+		
(2.5) Fibre broadband availability	++		
(2.6) Distance to main employment areas	+		

Commentary: Neither a primary school of a GP surgery is accessible within 10 minutes walking distance (800 metres), however the site is within 800 metres / 10 minutes walking distance from local employment opportunities. The site is 800 metres from a Sainsburys. The site is within 500 – 1,000 metres of a main employment area (Broomers Hill Park). Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): The site's proximity to local healthcare services can not be mitigated in regards to walking or cycling distances.

3. To meet the housing requirements of the whole community



A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

4.	То	ensure no	deterioration	of water	quality
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(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is over 200 metres from the nearest water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): No negative effects regarding water quality have been identified that would require mitigation.

### 5. To maintain and where possible improve air and noise quality

(5.1) Would the site experience noise / is it in close proximity to road traffic?

(5.2) Is the site within proximity to mineral extraction or waste management facilities?

Commentary: Although no rail noise has been identified on the site, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the west. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Areas (including 250m buffers) for both 'Building Stone' and 'Brick Clay Resource.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

### 6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The entirety of the site is similarly at a very low risk from surface water flooding.

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### SEA Objective / Key Criteria

Can effects be mitigated (?): No effects are highlighted regarding flood risk that would require mitigation.

8. To conserve and enhance biodiversity and geodiversity

(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)

(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.

(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites

(8.4) Is the site within a Bat Sustenance Zone

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yield specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is not within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): No negative effects regarding biodiversity of geodiversity have been identified that would require mitigation.

9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets

(9.2) Might the site have an impact on an area known for its archaeological value.

Commentary: The site is within close proximity to the Grade II listed Stane Street Hollow, which borders the site at its eastern boundary. Furthermore, the site is in relatively close proximity to the Grade II listed Codmore House to the north east. Uncertain effects are identified at this strategic stage, pending the specific details of any scheme that may come forward on this site. The site is not located within an Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?

(10.2) Will any Tree Preservation Orders (TPOs) be affected?





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# SEA Objective / Key CriteriaEffect(10.3) Is the site greenfield or brownfield?·(10.4) Is the site within Development Limits?+(10.5) Landscape capacity assessment·(10.6) Is the site within proximity to South Downs National Park?+

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). No trees that have Tree Preservation Orders exist on site. The site is located adjacent to the existing settlement boundary and is greenfield land. The site is entirely within an area identified as having no-low capacity as identified within the Landscape Character Assessment. There can be expected to be negative effects as a result of any development of the site. The site is distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design and layout considerations can be ensured, as well as open space and landscaping requirements on site. To this effect any successful scheme on the site could likely be made suitable in planning terms.

### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0

Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

### 12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options

(12.2) Accessibility issue raised in Site Assessment Report 2019

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).

Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to



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### SEA Objective / Key Criteria

be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

### 7.2.14 Site PPNP20 - Biarritz

SEA Objective / Key Criteria	Effect	Effect
	PPNP20(a)	PPNP20(b)
1. To improve the health of the population overall and reduce health inequalities		
(1.1) Will the site see a loss of land classified as 'open space'?	0	0
(1.2) Might the site be located on contaminated land?	+	+

Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.

Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.

2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure

(2.1) Accessibility to local education facilities	-	-
(2.2) Accessibility to local healthcare services	-	-
(2.3) Accessibility to both retail and service provision for day to day needs	+	+
(2.4) Accessibility to local employment opportunities	+	+
(2.5) Fibre broadband availability	++	++
(2.6) Distance to main employment areas	+	+

Commentary: Neither a primary school nor GP surgery is accessible within a 10 minute walking distance (800 metres) of the site. The site is 800 metres from a Sainsburys and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 – 1,000 metres of a main employment area (Broomers Hill Park). Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): The site's proximity to local education and healthcare services can not be mitigated in regards to walking or cycling distances.

3. To meet the housing requirements of the whole community



SEA Objective / Key Criteria	Effect	Effect
	PPNP20(a)	PPNP20(b)
A consistent level of information is required for all housing allocations and alternatives, which be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy is assessed in the site assessment.		
4. To ensure no deterioration of water quality		
(4.1) Proximity of any water bodies	-	-
(4.2) Is the site within a ground water source protection zone?	+	+

Commentary: The site is within 50 metres / adjacent to a small water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The negative effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies adjacent to the site, should any detailed issue be forthcoming, at the design stage.

(5.1) Would the site experience noise / is it in close proximity to road traffic?	-	-
(5.2) Is the site within proximity to mineral extraction or waste management facilities?	?	?

Commentary: Rail noise has been identified on the site at 55-64.9 decibels. Additionally, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the west. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Areas (including 250m buffers) for both 'Building Stone' and 'Brick Clay Resource.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?



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Strategic Environmental Assessment: Environmental Report



SEA Objective / Key Criteria	Effect PPNP20(a)	Effect PPNP20(b)
(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?	+	+

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. Although the majority of the site has a very low risk from surface water flooding, a very small area to the south of the site near the site boundary is at a low risk.

Can effects be mitigated (?): Effects regarding surface water flooding can be mitigated through the successful integration of SuDS.

8. To conserve and enhance biodiversity and geodiversity		
(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	+	+
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+	+
(8.4) Is the site within a Bat Sustenance Zone	-	-

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yields specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is partly within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): The Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets	?	?
(9.2) Might the site have an impact on an area known for its archaeological value.	+	+

Commentary: The site is in close proximity to the Grade II listed White Cottage to the west. Uncertain effects have been highlighted as a result pending the specific details of any scheme on the site. The site is not located within an Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the



SEA Objective / Key Criteria	Effect	Effect
	PPNP20(a)	PPNP20(b)

strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	?	?
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++	++
(10.3) Is the site greenfield or brownfield?	?	?
(10.4) Is the site within Development Limits?	+	+
(10.5) Landscape capacity assessment	-	-
(10.6) Is the site within proximity to South Downs National Park?	+	+

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). No trees that have Tree Preservation Orders exist on site. The site is located adjacent to the existing settlement boundary and is a mix of greenfield and brownfield land. The site is entirely within an area identified as having no-low capacity as identified within the Landscape Character Assessment. There can be expected to be negative effects as a result of any development of the site. The site is distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land as a resource, however marginal, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design and layout considerations can be ensured, as well as open space and landscaping requirements on site. To this effect any successful scheme on the site could likely be made suitable in planning terms.

### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0	0
(11.2) Will there be a loss of employment land (housing allocations)	+	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0	0

Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

### 12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

Strategic Environmental Assessment: Environmental Report



SEA Objective / Key Criteria	Effect PPNP20(a)	Effect PPNP20(b)
(12.1) Accessibility to public transport options	+	+
(12.2) Accessibility issue raised in Site Assessment Report 2019	-	-

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).

Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

### 7.2.15 Site PPNP21 - Minto

SEA Objective / Key Criteria	Effect
1. To improve the health of the population overall and reduce health inequalities	
(1.1) Will the site see a loss of land classified as 'open space'?	0
(1.2) Might the site be located on contaminated land?	+
Commentary: The site would see no net loss of publically accessible designated open space. There are no k contaminants on site that can be assumed through any previous land use.	nown
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.	
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	9
(2.1) Accessibility to local education facilities	-
(2.2) Accessibility to local healthcare services	
(2.3) Accessibility to both retail and service provision for day to day needs	+
(2.4) Accessibility to local employment opportunities	+
(2.5) Fibre broadband availability	++
(2.6) Distance to main employment areas	+



Commentary: Neither a primary school or a GP surgery is accessible within 10 minutes walking distance (800 metres), however the site is within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 – 1,000 metres of a main employment area (Broomers Hill Park). The site is 800 metres from a Sainsburys. Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): The site's proximity to local healthcare services can not be mitigated in regards to walking or cycling distances.

3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is between 50 – 100 metres from a small water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The uncertain effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies near to the site, should any detailed issue be forthcoming, at the design stage.

### 5. To maintain and where possible improve air and noise quality

(5.1) Would the site experience noise / is it in close proximity to road traffic?

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(5.2) Is the site within proximity to mineral extraction or waste management facilities?

Commentary: Rail noise has been identified as a potential issue on the site, and the site has also been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the west. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Areas (including 250m buffers) for both 'Building Stone' and 'Brick Clay Resource.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

6. To reduce emissions of greenhouse gases from energy consumption.

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### SEA Objective / Key Criteria

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

### 7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The entirety of the site is similarly at a very low risk from surface water flooding.

Can effects be mitigated (?): No effects are highlighted regarding flood risk that would require mitigation.

### 8. To conserve and enhance biodiversity and geodiversity

(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)

(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.

(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites

### (8.4) Is the site within a Bat Sustenance Zone

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yield specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is partly within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): The Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets

? +

(9.2) Might the site have an impact on an area known for its archaeological value.

Commentary: The site is adjacent to the Grade II listed White Cottage to the west. Uncertain effects have been highlighted as a result pending the specific details of any scheme on the site. The site is not located within an Archaeological Notification Area.



Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	?
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++
(10.3) Is the site greenfield or brownfield?	?
(10.4) Is the site within Development Limits?	+
(10.5) Landscape capacity assessment	-
(10.6) Is the site within proximity to South Downs National Park?	+

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). No trees that have Tree Preservation Orders exist on site. The site is located partly within and partly adjacent to the existing settlement boundary and is a mix of greenfield and brownfield land. The site is entirely within an area identified as having no-low capacity as identified within the Landscape Character Assessment. There can be expected to be negative effects as a result of any development of the site. The site is distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design and layout considerations can be ensured, as well as open space and landscaping requirements on site. To this effect any successful scheme on the site could likely be made suitable in planning terms.

11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function	
(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0
Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.	

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

### Effect

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SEA Objective / Key Criteria	Effect
(12.1) Accessibility to public transport options	+
(12.2) Accessibility issue raised in Site Assessment Report 2019	-
Occurrenter of The site is within 200m of a busic star, but is distance differentian testing station. There will be avia-	

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).

Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

### 7.2.16 Site PPNP22 – Greendene Nurseries

SEA Objective / Key Criteria	Effect
1. To improve the health of the population overall and reduce health inequalities	
(1.1) Will the site see a loss of land classified as 'open space'?	0
(1.2) Might the site be located on contaminated land?	+
Commentary: The site would see no net loss of publically accessible designated open space. There are no kee contaminants on site that can be assumed through any previous land use.	nown
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.	
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	e
(2.1) Accessibility to local education facilities	-
(2.2) Accessibility to local healthcare services	-
(2.3) Accessibility to both retail and service provision for day to day needs	+
(2.4) Accessibility to local employment opportunities	+
(2.5) Fibre broadband availability	++
(2.6) Distance to main employment areas	+



Commentary: Neither a primary school nor GP surgery is accessible within a 10 minute walking distance (800 metres) of the site. The site is 800 metres from a Sainsburys and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 – 1,000 metres of a main employment area (Broomers Hill Park). Fibre or wireless broadband is available in the broad area.

Can effects be mitigated (?): The site's proximity to local education and healthcare services can not be mitigated in regards to walking or cycling distances.

3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is over 200 metres from the nearest water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): No negative effects regarding water quality have been identified that would require mitigation.

### 5. To maintain and where possible improve air and noise quality

(5.1) Would the site experience noise / is it in close proximity to road traffic?

(5.2) Is the site within proximity to mineral extraction or waste management facilities?

Commentary: The site has been identified as experiencing potential road and rail noise at 55-70+ decibels. There will be negative effects in this regard. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Areas (including 250m buffers) for both 'Building Stone' and 'Brick Clay Resource.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): No effects regarding air or noise quality have been identified that would require mitigation.

6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

### Effect

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### SEA Objective / Key Criteria Effect 7. To reduce vulnerability and increase resilience to extreme weather events and flooding. (7.1) Is the site within Flood Risk Zone 2 or 3? ++ (7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water? ++ Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. The entirety of the site is similarly at a very low risk from surface water flooding. Can effects be mitigated (?): No effects are highlighted regarding flood risk that would require mitigation. 8. To conserve and enhance biodiversity and geodiversity + (8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s) (8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland. + (8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County

(8.4) Is the site within a Bat Sustenance Zone

Geographical Sites

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for the proposal to be consulted upon with Natural England in this location at the yield specified. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is partly within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): The Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

### 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets	++
(9.2) Might the site have an impact on an area known for its archaeological value.	+

Commentary: The site is distanced from any listed structures or other heritage assets. The site is not located within an Archaeological Notification Area.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.



Effect

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### SEA Objective / Key Criteria

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?

- (10.2) Will any Tree Preservation Orders (TPOs) be affected?
- (10.3) Is the site greenfield or brownfield?
- (10.4) Is the site within Development Limits?
- (10.5) Landscape capacity assessment

(10.6) Is the site within proximity to South Downs National Park?

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). No trees that have Tree Preservation Orders exist on site. The site is located partly within and partly adjacent to the existing settlement boundary. The site is greenfield land. The site is entirely within an area identified as having no-low capacity as identified within the Landscape Character Assessment. There can be expected to be negative effects as a result of any development of the site. The site is distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design and layout considerations can be ensured, as well as open space and landscaping requirements on site. To this effect any successful scheme on the site could likely be made suitable in planning terms.

### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0

Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options

(12.2) Accessibility issue raised in Site Assessment Report 2019



Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).

Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

### 7.2.17 Site PPNP23 – Puttocks Farm

SEA Objective / Key Criteria	Effect
1. To improve the health of the population overall and reduce health inequalities	
(1.1) Will the site see a loss of land classified as 'open space'?	0
(1.2) Might the site be located on contaminated land?	+
Commentary: The site would see no net loss of publically accessible designated open space. There are no k contaminants on site that can be assumed through any previous land use.	nown
Can effects be mitigated (?): No effects regarding health have been identified that would require mitigation.	
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructur	е
(2.1) Accessibility to local education facilities	-
(2.2) Accessibility to local healthcare services	-
(2.3) Accessibility to both retail and service provision for day to day needs	+
(2.4) Accessibility to local employment opportunities	+
(2.5) Fibre broadband availability	++
(2.6) Distance to main employment areas	+

Commentary: Neither a primary school of a GP surgery is accessible within 10 minutes walking distance (800 metres), however the site is within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 – 1,000 metres of a main employment area (Broomers Hill Park). The site is 800 metres from a Sainsburys. Fibre or wireless broadband is available in the broad area.

### Effect



Can effects be mitigated (?): The site's proximity to local healthcare services can not be mitigated in regards to walking or cycling distances.

### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is within 50 metres / adjacent to a small water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The negative effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies adjacent to the site, should any detailed issue be forthcoming, at the design stage.

### 5. To maintain and where possible improve air and noise quality

(5.1) Would the site experience noise / is it in close proximity to road traffic?	-
(5.2) Is the site within proximity to mineral extraction or waste management facilities?	?

Commentary: The site is within an area identified as experiencing road traffic noise at 55 decibels or more. The site is also within an area that experiences rail noise at between 55-64.9 decibels due to the presence of the railway line to the west of the site. The site has identified as having possible negative effects in this regard. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Areas (including 250m buffers) for both 'Building Stone' and 'Brick Clay Resource.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

### 6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.



## SEA Objective / Key Criteria Effect 7. To reduce vulnerability and increase resilience to extreme weather events and flooding. (7.1) Is the site within Flood Risk Zone 2 or 3? (7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water? ?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. There is however a strip of land that bisects the site from east to west that is identified as being of a medium risk of surface water flooding.

Can effects be mitigated (?): Effects regarding surface water flooding can be mitigated through the successful integration of SuDS.

8. To conserve and enhance biodiversity and geodiversity	
(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	?
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+
(8.4) Is the site within a Bat Sustenance Zone	-

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, and will require consultation with Natural England. Consultation is required of residential development of 100 dwellings or more in this location. Uncertain effects are highlighted at this stage however it should be acknowledged that negative effects can not be ruled out. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is partly within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): Effects on Habitats Sites can be mitigated through either on site requirements, conditions or through necessary planning contributions. Specific effects are identified at the Plan level (through the accompanying HRA / AA to the Neighbourhood Plan) and mitigated through policy requirements, and / or at the project level through further detailed HRA / AA work. Relevant to the Neighbourhood Plan, effects on Habitats Sites are more appropriately identified through the Plan's HRA / AA and any recommendations regarding mitigation made within that report. Regarding effects on protected bat species, the Horsham District Planning Framework identifies that within bat sustenance zones, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. Further, the Framework adds that development does however have potential to create places for biodiversity, for example by planting native species as part of site landscaping, or incorporating features such as bat boxes.

9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets

(9.2) Might the site have an impact on an area known for its archaeological value.





#### SEA Objective / Key Criteria

Commentary: The site is in close proximity to the Grade II listed Codmore House to the west. Uncertain effects have been highlighted as a result pending the specific details of any scheme on the site. The site is not located within an Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

### 10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	?
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++
(10.3) Is the site greenfield or brownfield?	
(10.4) Is the site within Development Limits?	+
(10.5) Landscape capacity assessment	-
(10.6) Is the site within proximity to South Downs National Park?	+

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). No trees that have Tree Preservation Orders exist on site. The site is located adjacent to the existing settlement boundary and represents greenfield land. The site is entirely within an area identified as having no-low capacity as identified within the Landscape Character Assessment. There can be expected to be negative effects as a result of any development of the site. The site is distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design and layout considerations can be ensured, as well as open space and landscaping requirements on site. To this effect any successful scheme on the site could likely be made suitable in planning terms.

#### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0
(11.2) Will there be a loss of employment land (housing allocations)	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0

Commentary: The site is proposed for housing and would not lead to any loss of existing employment land.

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Effect

+

?

N/A

N/A

#### SEA Objective / Key Criteria

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options

(12.2) Accessibility issue raised in Site Assessment Report 2019

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The Site Assessment Report 2019 identifies potential highways issues on site, leading to uncertain effects at this stage.

Can effects be mitigated (?): Any effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

#### 7.2.18 Site PPNP24 – Land South of Broomers Hill Park

SEA Objective / Key Criteria	Effect PPNP24(a)	Effect PPNP24(b)
1. To improve the health of the population overall and reduce health inequalities		
(1.1) Will the site see a loss of land classified as 'open space'?	0	0
(1.2) Might the site be located on contaminated land?	+	+
Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.		nown
Can effects be mitigated (?): No effects regarding health have been identified that would requi	ire mitigation.	
2. To ensure services and facilities are accessible for all and the inclusion of necessary	/ infrastructur	е
(2.1) Accessibility to local education facilities	-	N/A
(2.2) Accessibility to local healthcare services	-	N/A

(2.3) Accessibility to both retail and service provision for day to day needs

(2.4) Accessibility to local employment opportunities



SEA Objective / Key Criteria	Effect PPNP24(a)	Effect PPNP24(b)
(2.5) Fibre broadband availability	++	++
(2.6) Distance to main employment areas	++	N/A

Commentary: For option PPNP24(a) (for housing development), negative effects are realised as neither a primary school nor GP surgery is accessible within a 10 minute walking distance (800 metres) of the site. The site is 800 metres from a Sainsburys and within 800 metres / 10 minutes walking distance from local employment opportunities. The site is within 500 metres of a main employment area (Broomers Hill Park). For option PPNP24(b) (regarding employment development on the site), the majority of the accessibility criteria are not considered applicable to sites that are proposed for employment development. Fibre or wireless broadband is however available in the broad area.

Can effects be mitigated (?): The site's proximity to local education or healthcare services can not be mitigated in regards to walking or cycling distances. These factors are not considered relevant to non-residential uses on the site as proposed in Option PPNP24(b).

#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

#### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is within 50 metres / adjacent to a small water body. The site is not within a groundwater Source Protection Zone.

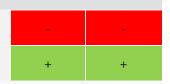
Can effects be mitigated (?): The detailed effects on water are unknown at this stage, and would be identifiable only at the planning application stage. The negative effect highlighted regarding potential for water quality issues due to the site's proximity to water bodies is precautionary, and no specific mitigation is identified at this strategic level. It is possible that the development proposal can successfully factor in the presence of any water bodies adjacent to the site, should any detailed issue be forthcoming, at the design stage.

#### 5. To maintain and where possible improve air and noise quality

(5.1) Would the site experience noise / is it in close proximity to road traffic?	-	-

(5.2) Is the site within proximity to mineral extraction or waste management facilities?

Commentary: Rail noise has been identified on the site at 55-64.9 decibels. Additionally, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the west. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities. Despite





SEA Objective / Key Criteria	Effect PPNP24(a)	Effect PPNP24(b)
this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Areas		

(including 250m buffers) for both 'Building Stone' and 'Brick Clay Resource.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?	++	++
(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?	-	-

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. Despite this, an area of land in the northern part of the site that is of a high risk of surface water flooding. Additionally, the majority of the site is identified as being at a medium risk of surface water flooding.

Can effects be mitigated (?): Effects regarding surface water flood risk can be mitigated through the successful integration of SuDS.

#### 8. To conserve and enhance biodiversity and geodiversity

(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	+	+
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+	+
(8.4) Is the site within a Bat Sustenance Zone	+	+

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for either employment or residential development at the yield proposed proposal to be consulted upon with Natural England in this location. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is not within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.



+

SEA Objective / Key Criteria	Effect	Effect
	PPNP24(a)	PPNP24(b)
Can effects be mitigated (?): No negative effects regarding biodiversity of geodiversity have been identified that would require mitigation.		
9. To conserve and where appropriate enhance areas and assets of historical and archa	aeological imp	oortance.
(9.1) Might the site have an impact on, or harm the significance of, historical assets	?	?
(9.2) Might the site have an impact on an area known for its archaeological value.	+	+
Commentary: The site is in close proximity to the Grade II listed Forge Cottage and The Old Forge to the south west. Uncertain effects have been highlighted as a result pending the specific details of any scheme on the site. The site is not located within an Archaeological Notification Area.		
Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.		
10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park		
(10.1) Is the site in an area noted for its high sensitivity to change?	?	?
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++	++

(10.3) Is the site greenfield or brownfield?

- (10.4) Is the site within Development Limits?
- (10.5) Landscape capacity assessment
- (10.6) Is the site within proximity to South Downs National Park?

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). The site is located adjacent to the existing settlement boundary, however extends north into the open countryside in a manner that could represent ribbon development; uncertain effects have been identified as a result. The site is currently greenfield land. The site is mostly within an area identified as having no-low capacity as identified within the Landscape Character Assessment, with a small area of the site at the northern boundary being within an area of low-moderate capacity. There can be expected to be negative effects as a result of any development of the site. The site is distanced from the South Downs National Park boundary.

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design

0

+



SEA Objective / Key Criteria	Effect	Effect
	PPNP24(a)	PPNP24(b)
and layout considerations can be ensured, as well as open space and landscaping requireme any successful scheme on the site could likely be made suitable in planning terms.	nts on site. To	this effect
11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function		
(11.1) Is the site proposed for employment development / loss of employment land?	0	+
(11.2) Will there be a loss of employment land (housing allocations)	+	+

(11.3) Will the proposal increase rural employment opportunities in a sustainable location?

Commentary: Option PPNP24(a) is proposed for housing and would not lead to any loss of existing employment land. Option PPNP24(b) however has been assessed for employment uses and will have positive effects as a result, including in regard to being located in a sustainable location (adjacent to the settlement boundary) for a rural employment use.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options	+	+
(12.2) Accessibility issue raised in Site Assessment Report 2019	+	+

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has no known issues regarding access to the existing road network.

Can effects be mitigated (?): No effects have been identified regarding access and sustainable transport that require mitigation.

#### 7.2.19 Site PPNP25 – Land North of Broomers Hill Park

SEA Objective / Key Criteria	Effect	Effect
	PPNP25(a)	PPNP25(b)
1. To improve the health of the population overall and reduce health inequalities		
(1.1) Will the site see a loss of land classified as 'open space'?	0	0
(1.2) Might the site be located on contaminated land?	+	+
Commentary: The site would see no net loss of publically accessible designated open space.	There are no k	nown

Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.



SEA Objective / Key Criteria	Effect	Effect
	PPNP25(a)	PPNP25(b)
Can effects be mitigated (?): No effects regarding health have been identified that would requi	ire mitigation.	
2. To ensure services and facilities are accessible for all and the inclusion of necessary	/ infrastructur	е
(2.1) Accessibility to local education facilities		N/A
(2.2) Accessibility to local healthcare services		N/A
(2.3) Accessibility to both retail and service provision for day to day needs		N/A
(2.4) Accessibility to local employment opportunities	+	N/A
(2.5) Fibre broadband availability	++	++
(2.6) Distance to main employment areas	++	N/A

Commentary: For option PPNP25(a) (for housing development), negative effects are realised as neither a primary school nor GP surgery is accessible within a 10 minute walking distance (800 metres) of the site. The site is more than 800 metres from a Sainsburys however within 800 metres / 10 minutes walking distance from local employment opportunities. The site is also within 500 metres of a main employment area (Broomers Hill Park). For option PPNP25(b) (regarding employment development on the site), the majority of the accessibility criteria are not considered applicable to sites that are proposed for employment development. Fibre or wireless broadband is however available in the broad area.

Can effects be mitigated (?): The site's proximity to local education and healthcare services and retail options can not be mitigated in regards to walking or cycling distances. This is not considered relevant to non-residential land uses, as proposed within PPNP25(b).

#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

#### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies	+	+
(4.2) Is the site within a ground water source protection zone?	+	+

Commentary: The site is over 100 metres from the nearest water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): No negative effects regarding water quality have been identified that would require mitigation.



SEA Objective / Key Criteria	Effect PPNP25(a)	Effect PPNP25(b)
5. To maintain and where possible improve air and noise quality		
(5.1) Would the site experience noise / is it in close proximity to road traffic?	-	-
(5.2) Is the site within proximity to mineral extraction or waste management facilities?	?	?

Commentary: Rail noise has been identified on the site at 55-64.9 decibels. Additionally, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the west. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Areas (including 250m buffers) for both 'Building Stone' and 'Brick Clay Resource.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding external noise can be mitigated on site through either or both effective bunding or through suitable building materials.

#### 6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

#### 7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?	++	++
(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?		

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. An area of land within the site's southernmost part carries a high risk from surface water flooding. Additionally, a small area within the north of the site is identified as being of a low risk from surface water flooding.

Can effects be mitigated (?): Effects regarding surface water flood risk can be mitigated through the successful integration of SuDS.

8. To conserve and enhance biodiversity and geodiversity		
(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	+	+
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+	+



	Effect PPNP25(a)	Effect PPNP25(b)
(8.4) Is the site within a Bat Sustenance Zone	+	+

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, however there is no requirement for either employment or residential development at the yield proposed proposal to be consulted upon with Natural England in this location. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is not within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): No negative effects regarding biodiversity of geodiversity have been identified that would require mitigation.

9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets	++	++
(9.2) Might the site have an impact on an area known for its archaeological value.	+	+

Commentary: The site is suitable distanced from any listed structures or other heritage assets. The site is not located within an Archaeological Notification Area.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

### 10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	?	?
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++	++
(10.3) Is the site greenfield or brownfield?	-	-
(10.4) Is the site within Development Limits?	-	-
(10.5) Landscape capacity assessment	?	?
(10.6) Is the site within proximity to South Downs National Park?	+	+

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). No trees that have Tree Preservation Orders exist on site. The site is located outside the development boundary and is poorly related to the functional settlement. As a result, negative effects have been highlighted. The site is also greenfield land. The site is entirely within an area identified as having low-moderate capacity. There can be expected to be uncertain effects as a result. The site is distanced from the South Downs National Park boundary.



SEA Objective / Key Criteria	Effect	Effect
	PPNP25(a)	PPNP25(b)

Can effects be mitigated (?): The loss of greenfield land, as a resource, can not be mitigated. Landscape concerns can not be truly mitigated or offset due to the loss of undeveloped land in the first instance, however suitable densities, design and layout considerations can be ensured, as well as open space and landscaping requirements on site. To this effect any successful scheme on the site could likely be made suitable in planning terms.

#### 11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?	0	+
(11.2) Will there be a loss of employment land (housing allocations)	+	+
(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	0	?

Commentary: Option PPNP25(a) is proposed for housing and would not lead to any loss of existing employment land. Option PPNP25(b) however has been assessed for employment uses and will have positive effects as a result. Despite this, this option has been assessed as having uncertain effects in regard to being located distanced from the settlement boundary.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options	+	+
(12.2) Accessibility issue raised in Site Assessment Report 2019	+	+

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has no known issues regarding access to the existing road network.

Can effects be mitigated (?): No effects have been identified regarding access and sustainable transport that require mitigation.

#### 7.2.20 Site PPNP27 – Land at Toat Café and Lorry Park

SEA Objective / Key Criteria	Effect
1. To improve the health of the population overall and reduce health inequalities	
(1.1) Will the site see a loss of land classified as 'open space'?	0
(1.2) Might the site be located on contaminated land?	+

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Commentary: The site would see no net loss of publically accessible designated open space. There are no known contaminants on site that can be assumed through any previous land use.

Can effects be mitigated (?): No negative effects have been identified regarding health that would require mitigation.

#### 2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure

(2.1) Accessibility to local education facilities	N/A
(2.2) Accessibility to local healthcare services	N/A
(2.3) Accessibility to both retail and service provision for day to day needs	N/A
(2.4) Accessibility to local employment opportunities	N/A
(2.5) Fibre broadband availability	++
(2.6) Distance to main employment areas	N/A

Commentary: The majority of the accessibility criteria are not considered applicable to sites that are proposed for employment development. Fibre or wireless broadband is however available in the broad area.

Can effects be mitigated (?): There are no negative effects highlighted regarding accessibility that would require mitigation.

#### 3. To meet the housing requirements of the whole community

A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.

#### 4. To ensure no deterioration of water quality

(4.1) Proximity of any water bodies

(4.2) Is the site within a ground water source protection zone?

Commentary: The site is within 50 metres / adjacent to a small water body. The site is not within a groundwater Source Protection Zone.

Can effects be mitigated (?): The effects regarding possible water contamination that have been identified are precautionary at this stage. Any forthcoming planning application may need to be subject to consultation with the Environment Agency. It is possible that a suitable assessment of effects in more detail and relevant to the specific proposal would be required at the planning application stage.

5. To maintain and where possible improve air and noise quality

#### Effect

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# SEA Objective / Key Criteria Effect (5.1) Would the site experience noise / is it in close proximity to road traffic? • (5.2) Is the site within proximity to mineral extraction or waste management facilities? ?

Commentary: Although no rail noise has been identified on the site, the site has been identified as experiencing road traffic noise at 65-69.9 decibels associated with the A29 to the east. Negative effects have therefore been identified. The site is not within close proximity to any mineral extraction or waste management facilities. Despite this, as identified within the West Sussex Minerals Local Plan, the site is located within the Minerals Safeguarding Areas (including 250m buffers) for both 'Building Stone' and 'Brick Clay Resource.' Consultation with West Sussex County Council, as the Minerals Planning Authority, would have to be forthcoming at the planning application stage.

Can effects be mitigated (?): Effects regarding road traffic noise can be effectively mitigated through either bunds or suitable building materials.

6. To reduce emissions of greenhouse gases from energy consumption.

There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.

7. To reduce vulnerability and increase resilience to extreme weather events and flooding.

(7.1) Is the site within Flood Risk Zone 2 or 3?

(7.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?

Commentary: The site is wholly within Flood Risk Zone 1, indicating no fluvial flood risk concerns. A very small area of land within the eastern part of the site is identified as having a medium risk from surface water flooding. Additionally, areas of low risk are identified on site.

Can effects be mitigated (?): Effects regarding surface water flooding can be mitigated through the successful integration of SuDS.

8. To conserve and enhance biodiversity and geodiversity	
(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	?
(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	+
(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	+
(8.4) Is the site within a Bat Sustenance Zone	+

Commentary: The site is within the ZOI and IRZ of the Arun Valley SPA and Ramsar site, and will require consultation with Natural England. Consultation is required of employment (non-residential) development outside development boundaries where development would exceed 1 hectare. Uncertain effects are highlighted at this stage however it should



#### SEA Objective / Key Criteria

be acknowledged that negative effects can not be ruled out. The site is not in close proximity to any Regionally Important Geological / Geomorphological Sites (RIGS) or County Geographic Sites. The site is not within a Bat Sustenance Zone. The site is also not in close proximity to any local wildlife designations, and as such development can not be expected to have a detrimental impact.

Can effects be mitigated (?): Effects on Habitats Sites can be mitigated through either on site requirements, conditions or through necessary planning contributions. Specific effects are identified at the Plan level (through the accompanying HRA / AA to the Neighbourhood Plan) and mitigated through policy requirements, and / or at the project level through further detailed HRA / AA work. Relevant to the Neighbourhood Plan, effects on Habitats Sites are more appropriately identified through the Plan's HRA / AA and any recommendations regarding mitigation made within that report.

9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.

(9.1) Might the site have an impact on, or harm the significance of, historical assets

(9.2) Might the site have an impact on an area known for its archaeological value.

? +

Commentary: The site is in close proximity to the Grade II listed Mill House to the south east and also the Grade II listed Cherry Tree Cottage to the west. Uncertain effects have been highlighted as a result pending the specific details of any scheme on the site. The site is not located within an Archaeological Notification Area.

Can effects be mitigated (?): The mitigation of effects on the historic environment is considered applicable at the planning application stage only, should this site come forward within the Plan period. Whereas proximity testing is useful at the strategic level, the absence of any detailed proposals hinder the ability to recommend suitable mitigation as much depends on the scale, type and design of proposals. Suitable policy exists at the District level regarding the historic environment.

10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park

(10.1) Is the site in an area noted for its high sensitivity to change?	?
(10.2) Will any Tree Preservation Orders (TPOs) be affected?	++
(10.3) Is the site greenfield or brownfield?	?
(10.4) Is the site within Development Limits?	
(10.5) Landscape capacity assessment	
(10.6) Is the site within proximity to South Downs National Park?	+

Commentary: The site is within an area of 'moderate' sensitivity to change (development) as identified within the Horsham landscape Character Assessment (2003). No trees that have Tree Preservation Orders exist on site. The site is located within the open countryside and distanced from the development limits although this may be suitable for a rural employment use. The site is partly greenfield, and partly brownfield land. Approximately half of the site is within an area

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#### SEA Objective / Key Criteria

identified as having no-low landscape capacity, with the other half having low-moderate capacity. There can be expected to be negative effects as a result. The site is distanced from the South Downs National Park boundary.

Can effects be mitigated (?): Effects regarding landscape can be mitigated through an appropriate development scheme. At this strategic stage it is not possible to determine whether the allocation of this site would lead to significant effects in the absence of the specific details of any proposed scheme on site.

11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

(11.1) Is the site proposed for employment development / loss of employment land?

(11.2) Will there be a loss of employment land (housing allocations)

(11.3) Will the proposal increase rural employment opportunities in a sustainable location?

Commentary: The site has been assessed for employment uses and will have positive effects as a result of ensuring a net gain in employment floorspace. Despite this, the site has been assessed as having uncertain effects in regard to being located distanced from the settlement boundary.

Can effects be mitigated (?): No negative effects have been highlighted that would require mitigation.

12. To promote sustainable transport, walking and cycling uptake and encourage efficient patterns of movement

(12.1) Accessibility to public transport options

(12.2) Accessibility issue raised in Site Assessment Report 2019

Commentary: The site is within 800m of a bus stop, but is distanced from the train station. There will be minor positive effects as a result. The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report (2019).

Can effects be mitigated (?): The effects regarding traffic / accessibility should be properly identified at the planning application stage (through a Transport Statement or Transport Assessment as required), should an application be forthcoming. As set out in National Planning Policy Guidance (NPPG), Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

#### 7.3 The Reasons for Selecting and Rejecting Alternative Options

The allocation of the sites within the Neighbourhood Plan is supported by the findings of this SEA Environmental Report. Although the effects identified can not be quantified (i.e. an overall sustainability 'score' calculated) due to some criteria being more critical to a site's sustainability than others (including the ability to mitigate effects), the sites can generally be considered to have the least amount of identified negative, and the most amount of positive effects. In conformity to the core principles of the NPPF the sites

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are within or adjacent the development boundary, represent previously developed land where possible and can be seen to offer significant benefits in housing and employment land delivery. The sites are also in close proximity to numerous key services and facilities within the Plan area, including rail and bus links.

The following table outlines the Parish Council's reasons for selecting and rejecting each of the sites assessed above.

#### Table 27: Reasons for the Selection / Rejection of Site Options

Site Ref.
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#### Preferred Site Allocations within the Neighbourhood Plan

PPNP09/10	This policy allocates New Place Farm Nursery located on the northern edge of Pulborough village and the land immediately to the south of the nursery, for a housing scheme that may comprise 174 homes. The land is available for development and as a large scale proposal that will deliver the majority of the Parish's local housing needs, is preferred to options in the Codmore Hill area which has experienced multiple recent planning permissions.
PPNP11	The land has been made available for this purpose by the landowner. The land creates the opportunity to establish a Community Land Trust scheme to deliver a mix of self-build and affordable homes (to be retained in perpetuity for local people). A Trust has recently been formed and is expected to bring forward a scheme as a normal planning application for this land in due course.
PPNP05(a)	The site is potentially suitable, available and achievable, and scored an 'amber' rating in the Site Assessment Report, indicating that on-site constraints are not significant and can be overcome. The site was one of the best performing sites within the Site Assessment Report and is within the existing built-up area boundary close to services, facilities and public transport links. Recent housing developments local to this site have highlighted the need to provide public/community services and support would be given to commercial enterprises of this nature within the site.
PPNP06(a)	The site is potentially suitable, available and achievable, and scored an 'amber' rating in the Site Assessment Report, indicating that on-site constraints are not significant and can be overcome. The site was one of the best performing sites within the Site Assessment Report and is within the existing built-up area boundary close to services, facilities and public transport links.
PPNP07	The site is potentially suitable, available and achievable, and scored an 'green' rating in the Site Assessment Report, indicating that only minor on-site constraints exist and can be overcome. The site was the best performing sites within the Site Assessment Report and is within the existing built-up area boundary close to services, facilities and public transport links.
PPNP17	This land is available, developable and deliverable. The Plan states that development affords a natural infill on the western side of Sopers Hill and is in close proximity to much of the existing recreational and

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Site Ref.	Reasons for Selection / Rejection
	community facilities.
PPNP24	The allocation of this site encourages new employment development at the most appropriate location in the parish. The site adjoins an existing business area on the edge of Codmore Hill and can be accessed from the A29. The Plan states that this new allocation will significantly increase the total area of business land in the village to provide local jobs, which will help reduce the high levels of out-commuting.
PPNP27	The site is allocated as redevelopment of the land currently partially occupied by the Toat Café (but including a wider area of previously used land that has no beneficial use) will ensure an attractive gateway into the village, and the National Park, from the main northern direction.
PPNP16	An appropriate expansion of the popular garden centre to the west of the village will create more jobs but only within defined area to minimise impact on the National Park. Development of the site also protects the South Downs Light Railway which is a highly valued visitor attraction within the Centre.

#### **Rejected Site Options / Alternatives**

PPNP01	Site PPNP01 is within the village Conservation Area and has been recommended by the community for designation as an open green space unsuitable for housing development. The area is contained within the Local Green Spaces Study, which is an appended document supporting Policy 14 within the Pre-Submission Plan.
PPNP03	The site is within a Conservation Area and in relatively close proximity to the Grade I listed Church of St Mary to the south, and also numerous Grade II listed buildings to the south. The site is also located in an area with the potential for archaeological deposits associated with the Pulborough Historic Core Archaeological Notification Area.
PPNP08	The site has a capacity to accommodate only six or fewer houses and is considered a windfall site. It has therefore not been included within the PPNP.
PPNP13	Site PPNP13 is within the village Conservation Area and has been recommended by the community for designation as an open green space unsuitable for housing development. The area is contained within the Local Green Spaces Study, which is an appended document supporting Policy 14 within the Pre-Submission Plan.
PPNP15	The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report. Proposed for only four dwellings this site has not been considered within the PPNP due to its low dwelling yield.

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Site Ref.	Reasons for Selection / Rejection
PPNP18 PPNP20 PPNP21 PPNP22 PPNP23	<ul> <li>The site Assessment Report states that,</li> <li>It has long been the contention that any further development above the roundabout on Codmore Hill is unsustainable.</li> <li>The A29 has recently been upgraded to be part of the Major Road Network. This upgrading is the result of studies having been undertaken which have shown that there has been a significant increase in vehicles on this road and it can no longer be classified as a Local Lorry Network route. Pedestrians will therefore be at greater risk from exhaust fumes.</li> <li>All the main infrastructure such as schools, primary care, village hall and recreational facilities are located south of the railway bridge.</li> <li>Paragraph 3.27 within the Pre-Submission Plan refers to safer crossings needed across the railway. Two new footbridges are proposed.</li> <li>The first footbridge is close to the southern side of Pigeon Gate Bridge which carries the A29 across the railway. Section 106 monies have already been set aside to mitigate the dangers to pedestrians on this bridge but as yet no action has been instigated.</li> <li>The second footbridge is to enhance Footpath No. 2330 to enable pedestrians from Codmore Hill to avoid walking and cycling beside the busy main road to reach the school and other parts of the village. A bridge over the railway and the replacement of steps up the hillside with a sloping path will be necessary.</li> </ul>
PPNP25	The site has been rejected as it is distanced from the built-up area boundary, there are landscape concerns, and has additional surface water flood risk issues.



## 8. Conclusions & Recommendations (including Mitigation)

#### 8.1 Summary of Effects highlighted in this SEA

This conclusions section sets out the effects of the Plan 'as a whole' on each of the SEA Objectives in consideration of both the Plan's policies and site allocations. The conclusions are set out under a sub-heading per SEA Objective.

8.1.1 To improve the health of the population overall and reduce health inequalities

#### **Positive effects**

In consideration of the Plan's policies and site allocations, positive effects can be expected regarding heath and promoting healthy lifestyles. The proposed policies of the Plan focus on a relatively small number of key development issues in the area and these are reflected in the positive cumulative effects identified regarding health (through multiple policies ensuring that open space and facilities pertaining to healthy lifestyles are retained or expanded).

### 8.1.2 To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure

#### **Uncertain / positive effects**

Positive effects can be considered regarding the location of the site allocations and distances to a wide range of services, facilities and employment opportunities. In regard to road access however, there is a degree of uncertainty at this stage as many of the site policies do not require access solutions to be sought of proposals despite issues being identified. Despite this, effects are realised singularly, and not cumulatively on the whole, aside from a cumulative concern regarding access from Glebelands for the Plans' Policy 2 allocation (for 170 dwellings) and Policy 3 (for 20 dwellings). Cumulatively, and with separate access points on this narrow road, there could be negative implications from multiple developments. This SEA however only raises a concern at this stage in the absence of any firm evidence and considers that further information is likely to be included at the masterplanning stage as included within Policy 2 and dealt with at the development management stage. Effects are unknown at this stage although it should be acknowledged that West Sussex County Council Highways have not identified any of their own concerns regarding the New Place Nurseries site. The Plan also has included a Community Aim within the Plan that seeks suitable access from this site.



#### 8.1.3 To meet the housing requirements of the whole community

#### Significant positive effects

Significant positive cumulative effects are assessed regarding SEA Objective 3 (meeting local housing needs). The Plan not only meets the necessary quantum of housing growth, but also ensures a mix of types, tenures and affordability through the various Plan policies.

#### 8.1.4 To ensure no deterioration of water quality

#### Uncertain effects

Uncertain cumulative effects are realised for water quality, in consideration of several allocations being in a Groundwater Source Protection Zone. Many effects are also highlighted individually regarding effects on nearby water bodies, but it is considered that these effects are not common to a single receptor. The lack of policy direction on a number of thematic environmental areas of sustainability within the Plan, with a stance that the Plan not repeat District and National policy, leads to uncertain effects overall.

#### 8.1.5 To maintain and where possible improve air and noise quality

#### Uncertain effects

The potential for noise effects have been identified for a number of site allocations due to site proximity to main roads and the railway line. Effects regarding noise have been identified cautiously, yet it is acknowledged that other factors such as building materials and topography are likely to address these issues outside of the Plan's influence. The Plan adopts a stance of not repeating District and National policy, however again cautiously uncertain effects have been identified overall.

#### 8.1.6 To reduce emissions of greenhouse gases from energy consumption

#### **Positive effects**

The Plan includes that some commercial land allocations should ensure high standards of energy efficiency, and this is replicated through framework policy that requires BREEAM and HQM standards to be met.

### 8.1.7 To reduce vulnerability and increase resilience to extreme weather events and flooding

#### No effects

Although some of the site allocation policies include areas of land that have a high risk from surface water flooding, overall effects are considered neutral in light of SuDS requirements being included within policies



#### where potential issues are most significant.

#### 8.1.8 To conserve and enhance biodiversity and geodiversity

#### Uncertain effects

The need for HRA / AA work to be undertaken at the Plan level indicates that effects on biodiversity will be negative related to the level of housing growth set out within the Plan. The findings of the AA work lead to a number of policy recommendations regarding effects that site allocations will have on Habitats Sites (the Arun Valley SPA and Mens SAC). These recommendations have been factored in to the relevant Plan policies to ensure that mitigation is secured to enable the development proposals identified within the Plan. Despite this, effects are uncertain overall pending the findings and mitigation proposed within project-level HRA/AA work that is required of all development proposals.

### 8.1.9 To conserve and where appropriate enhance areas and assets of historical and archaeological importance

#### **Uncertain / neutral effects**

Uncertain to neutral effects are identified at this strategic stage. It is difficult to assess with any certainty whether a site allocation would have a negative effect on a heritage asset based on proximity alone and many details of forthcoming schemes are not available or necessarily appropriate to assess in the absence of a consistent level of information for all preferred and rejected site options. Neural effects can however be expected as a result of Plan policies, and the introduction of site policy criteria for many site allocations within the Plan, as per recommendations made within a previous iteration of the SEA.

### 8.1.10 To conserve and enhance the quality and local distinctiveness of landscapes including the South Downs National Park

#### Neutral effects

Effects on landscape have been assessed as neutral. Whilst many of the Plan policies will ensure positive outcomes through policy approaches, cumulatively there will be an inevitable loss of greenfield land in areas where landscape capacity is 'low' and sensitivity is high. In response to the level of housing growth needed, the Plan does well to predominately allocate brownfield land for development and ensure that only modest growth is experienced in sensitive landscapes.

### 8.1.11 To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

#### **Positive effects**

There will be positive effects also on the allocation of numerous sites for commercial uses and employment land. Together, this can be seen to support the level of housing growth in the Plan area, and ensure that

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there is no significant loss of employment at the Plan level.

### 8.1.12 To promote sustainable transport, walking any cycling uptake and encourage efficient patterns of movement

#### No effects

The Plan ensures that all residential and mixed-use allocations are accessible to public transport nodes, as a key consideration in the site selection methodology included within the Plan's accompanying Site Assessment Report (2019). No policy considerations address any need for improved public transport infrastructure, which would lead to positive effects, and so there can be expected to be a continuation of the baseline position.

#### 8.2 Recommendations made throughout the SEA

As outlined within the assessment of individual polices, a previous iteration of the SEA included many recommendations that have been since integrated into the latest version of the Neighbourhood Plan. The following recommendations represent those that have been made of the latest version of the Neighbourhood Plan and have been made for single policies throughout the SEA process. These are:

#### 8.2.1 Policy 4: Land off Station Approach, Pulborough

Of the uncertain effects identified within Section 7, a number of these are not covered by the site Policy. These include the potential for contamination on site due to the site's previous land use and traffic / accessibility. It is recommended that Policy criteria are included that address these issues, requiring further evidence to support any forthcoming planning application.

### 8.2.2 Policy 5a: Land at Harwoods Garage, Pulborough, on eastern side of A29

Issues surrounding surface water flood risk should however be addressed in the Policy in so far as they can shape the design of any scheme and are therefore relevant to other Policy 5a criteria. It is recommended that Policy criteria are included that address these issues, requiring further evidence to support any forthcoming planning application, including the requirement for SuDS.

#### 8.2.3 Policy 5b: Harwoods Car Park, Pulborough, on western side of A29

The Policy could seek further information at the planning application stage to address any water quality concerns surrounding the water body a short distance from the site.

#### 8.2.4 Policy 6: Land at Highfields

Issues surrounding landscape should be addressed within the Policy through suitable policy criteria (the site is also in an area of moderate sensitivity to change) and the requirement for suitable assessment

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#### respectively.

A small water body exists 50-100m from the site. The implications of this should be addressed at the planning application stage and a criterion for further assessment could be incorporated into the Policy.

#### 8.2.5 Policy 7: Broomers Hill Industrial Estate, Codmore Hill

Issues surrounding surface water flood risk and water quality are not addressed within the Policy. It is recommended that the Policy require a suitable assessment addressing both of these issues at the planning application stage and the incorporation of SuDS where necessary.

### 8.2.6 Policy 8: Land formerly known as the Toat Café, Stane Street, Pulborough

It is recommended that, in light of the effects that can be expected on any new residents of the site in regard to accessibility issues, enabling residential development is not included within the Policy and that the alternative option is progressed.

The Policy does not seek that any forthcoming planning application seek to identify issues surrounding water and if necessary, address them on site. It is recommended that a policy criterion addressing this is included.

#### 8.2.7 Policy 9: Pulborough Garden Centre, Stopham Road

Uncertain effects regarding the site's proximity to a small water body were also identified in the Section 7 assessment of the site. This consideration has not been factored into the site Policy and it is recommended that a criterion addressing this concern is included.

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### 9. Next Steps

#### 9.1 Consulting on the SEA Environmental Report (Stage A5)

The next stage in the SEA and plan-making process is to consult on this Environmental Report with the statutory consultees, those being:

- The Environment Agency
- Historic England
- Natural England

The SEA Environmental Report will also be subject to consultation with the public and any other interested bodies and parties. This SEA Environmental Report will be made available alongside the Neighbourhood Plan for the Pre-submission consultation (Regulation 14). Consultation is required of the Plan and the SEA Environmental Report at this stage in order for the Plan to meet necessary basic conditions tests.



### Appendix 1: Baseline Information

#### A1.1 Population and Society

Pulborough Parish is located in the western part of Horsham District in the County of West Sussex. It is situated close to the A29 and A283 and is partially within the South Downs National Park.

#### A1.1.1 Demographics

The population of Horsham in 2013 is estimated to be 132,900, based on ONS 2013 Mid-Year Population Estimates. This is an increase of 10,600 people since 2001, an 8.7% increase over the 12 year period<sup>2</sup>. The main reason for this is an increase in migration into the District. The age profile of the population is mostly similar to West Sussex, although there is a higher level of older people compared to the region and nationally. The Pulborough Medical Group (PMG) shared analysis that they were expecting 40% of the Pulborough population to be over 65 years by the end of the Plan period. Table 1 highlights the change in age structure within Horsham.

Pulborough in contrast has a population number of 5,205 as taken from the 2011 census<sup>3</sup>. The average age of the population is slightly older than the national average. Of this population, 47.9% are male and 52.1% are female. According to 2011 figures, there had been an increase of 495 residents (10.5%) from the previous census of 2001. The figure below shows how the population of Pulborough compares to regional and national figures.

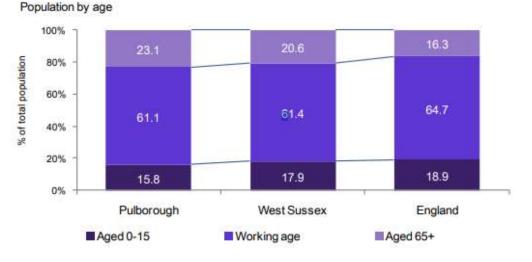


Figure 3: Population by age group in Pulborough

#### Source:

Community Profile for Pulborough<sup>4</sup>

Rural

<sup>&</sup>lt;sup>2</sup> Housing Need in Horsham District, Horsham District Council March 2015

<sup>&</sup>lt;sup>3</sup> Pulboroughparishcouncil.gov.uk/Pulborough.php

<sup>&</sup>lt;sup>4</sup> Action with Communities in Rural England (ACRE) Rural Evidence Report – Rural Community Profile for Pulborough (Parish) 2013



#### Table 28: Age structure in Pulborough Parish

Age group	Parish figure 2011	District figure 2011	England figure 2011
Under 15	828 (15.9%)	24,543 (18.7%)	10,002,836 (18.9%)
16-24	420 (8.1%)	11,864 (9%)	6,284,760 (11.9%)
25-44	1,202 (23.1%)	31,100 (23.7%)	14,595,152 (27.5%)
45-64	1,554 (29.9%)	38,224 (29.1%)	13,449,179 (25.4%)
65+	1,202 (23.1%)	25,570 (19.5%)	8,660,529 (16.3%)
Total	5,206	131,301	53,012,456

Source: Pulborough Neighbourhood Plan; Stage 1 Report – Part B: Community Evidence 2014

The population of Horsham is predicted to increase between the years 2011 to 2031 by around 17,300 people, showing a 13.2% increase. Table 2 below shows the projected population growth in Horsham compared to regional and national levels.

 Table 29:
 Projected Population Growth (2011-2031)

Administrative area	Population 2011	Population 2031	Change in population	% change
Pulborough	5,206	N/A	N/A	N/A
Horsham	131,540	148,859	17,319	13.2%
West Sussex	808,900	938,200	129,300	16%
South East	8,652,800	9,979,900	1,327,100	15.3%
England	53,107,200	60,418,800	7,311,600	13.8%

#### Source: ONS

The northern West Sussex sub-region has a similar breakdown of ethnic groups to the South East as a whole, with an average of 95% of residents being of the 'white' ethnic group. In both Horsham and Mid Sussex, however, over 97%<sup>5</sup> of the population is made up of the white ethnic group, with Horsham showing the highest percentage level of residents belonging to this group. However, there has been an increase in the number of people from the Black Minority Ethnic (BME) groups. There has been a 2% increase in this group between 2001 and 2011.

Net migration fell slightly between 2001 and 2011 which was mostly due to the number of 16 to 24 year old moving out of the District during this period<sup>6</sup>. Net migration to the District has been increasing with 1,400 in 2017. This shows more families moving in with young and adolescent children and increases in people within

<sup>&</sup>lt;sup>5</sup> Northern West Sussex Economic Appraisal / Part 1: Employment Land Review – Final Report 2009

<sup>&</sup>lt;sup>6</sup> The Horsham District Economic Profile; Surveying the Current Economic Profile of Horsham District 2018

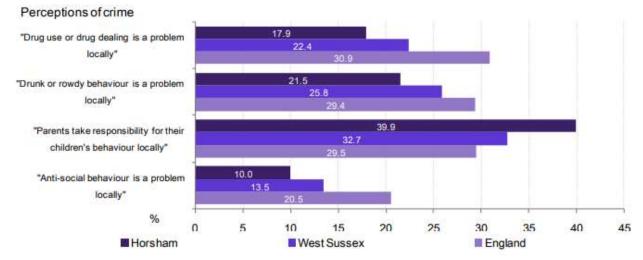


the 35-49 year old age group and 0-14 year old age group<sup>7</sup>. People within the 15-19 year old age category have seen a sharp decline, possibly due to educational facilities being located out of Horsham.

#### A1.1.2 Crime

Crime and anti-social behaviour have been recorded as low throughout Horsham. Despite this, fear of crime and antisocial behaviour is a major concern for many residents within Pulborough and Horsham as a whole<sup>8</sup>. The crime rate has been totalled as 44 per 1000 of the population (of Horsham) as of June 2018, however there has been a slight increase throughout 2018 in comparison to 2017<sup>9</sup>.





Source: Rural Community Profile for Pulborough (Parish)

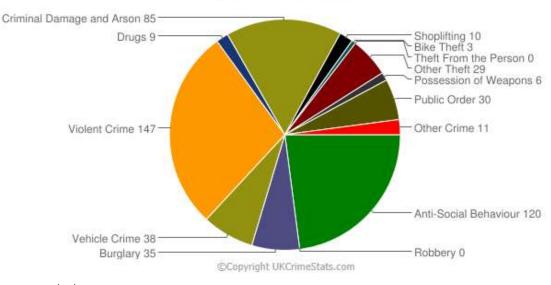
<sup>&</sup>lt;sup>7</sup> The Horsham District Economic Profile; Surveying the Current Economic Profile of Horsham District 2018

<sup>&</sup>lt;sup>8</sup> Horsham District Planning Framework (excluding South Downs National Park) – Sustainability Appraisal Environmental Report, 2015

<sup>&</sup>lt;sup>9</sup> The Horsham District Economic Profile; Surveying the Current Economic Profile of Horsham District 2018







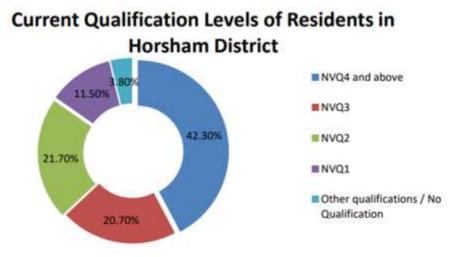
Crime Breakdown - Jul 2018-Jun 2019

Source: www.ukcrimestats.com

#### A1.1.3 Education and Skills

Horsham District sees a high level of education attainment within the workforce, with 50% being educated to degree level or above<sup>10</sup>. The district has one of the lowest claimant rates in the country; the number of JSA (Jobseekers Allowance) claimants has again dropped by 35% since March 2014<sup>11</sup>.

Figure 6: Current Qualification Levels of Residents in Horsham District



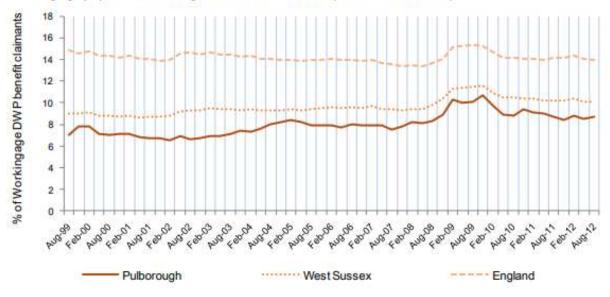
Source: The Horsham District Economic Profile 2018

<sup>&</sup>lt;sup>10</sup> Horsham District Planning Framework (excluding South Downs National Park) – Sustainability Appraisal Environmental Report, 2015

<sup>&</sup>lt;sup>11</sup> The Horsham District Economic Profile; Surveying the Current Economic Profile of Horsham District 2018



#### Figure 7: Working age population claiming DWP benefit claimants



Working age population claiming DWP benefit claimants (for all DWP benefits)

Source: Rural Community Profile for Pulborough (Parish)<sup>12</sup>

Table 30: Qualifications and Skills within Pulborough and Horsham District

Level of Education	No. of residents in Pulborough	% of residents in Pulborough	% Horsham District
No Qualifications	824	18.8%	19.5%
Level 1 Qualifications	611	14%	11.6%
Level 2 Qualifications	797	18.2%	15.9%
Apprenticeship Qualifications	157	3.6%	3.4%
Level 3 qualifications	568	13%	12.8%
Level 4 and above qualifications	1,223	27.9%	32.4%
Other qualifications	198	4.5%	4.4%

Source: Pulborough Neighbourhood Plan; Stage 1 Report – Part B: Community Evidence 2014

<sup>&</sup>lt;sup>12</sup> Action with Communities in Rural England (ACRE) Rural Evidence Report – Rural Community Profile for Pulborough (Parish) 2013

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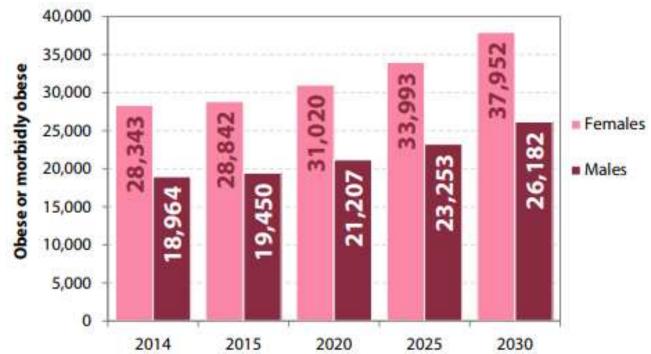


#### A1.2 Health and Wellbeing

Data for Pulborough on the health and wellbeing of the population is scarce; therefore statistics for Horsham District have been used as a general indicator. The average life expectancy in Horsham District in 2009 was 80.5 years for men and 83.6 years for women. In the 2011 census, only 3.5% of the population rated their health as 'bad' or 'very bad'. The level of smoking in the District is very low compared to national and regional averages, at only 18%<sup>13</sup>. Access to healthcare is limited in the District, with a lack of a major hospital close by alongside the rural nature of the District is noted as being a major concern.

Horsham is projected to have a rise in people aged over 75, and therefore demand across the different care types is estimated to rise by 88%. The percentage of people aged 65+ in West Sussex that are obese or morbidly obese is 26% with females having higher levels of obesity than males. This number is expected to increase to 36% by 2030. Males are projected to have a higher increase than females, with a 38% increase compared to 35%, as illustrated in the figure below.





Source: West Sussex Life 2017-2019<sup>14</sup>

People aged 65+ have the highest risk of falling, and approximately 59,027 may be expected to fall each year in West Sussex according to the College of Occupational Therapists. Falls are the largest cause of emergency hospital admissions for older people, with 4,199 admissions in 2014/15 for injuries caused by falls for people aged 65+ in West Sussex.

Finds from the Lives of Older People in West Sussex Survey 2013 include:

<sup>&</sup>lt;sup>13</sup> Horsham District Planning Framework (excluding South Downs National Park) – Sustainability Appraisal Environmental Report, 2015

<sup>&</sup>lt;sup>14</sup> West Sussex Life 2017-19 – Independent for Longer in Later Life

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- Those living in more deprived areas were 30% more likely to be lonely than those in other areas;
- Lonely people were 60% more likely to be in poor health and 78% more likely to have reported multiple emergency admissions to hospital;
- Loneliness is more common in those with poor sight, poor hearing and memory problems; and
- Contact with neighbours and participation in groups were associated with a 20% reduction in the likelihood of a respondent being lonely.

The proportion of children who are of a healthy weight in West Sussex, for both Reception year (79.6%) and Year 6 (69.3%), is significantly higher than England. The Lifestyles of 14 to 15 year-olds in West Sussex survey, carried out in 2014, found that between 20.5% and 27.3% of 14-15 year olds perceived themselves as slightly overweight and between 2.2% and 5.4% perceived themselves as very overweight. In the same report, 59% of boys and 61% of girls reported that they rarely or never drink alcohol. Teenage pregnancy rates have decreased over the past 18 years to a level 50% below the 1998 baseline, with 18.2 conceptions per 1,000 females aged 15-17 in 2014. Horsham District sees 12.4 conceptions per 1,000 females.

Health Status	No. of residents in Pulborough	% of residents in Pulborough	% of residents in Horsham
Very Good	2,411	46.3%	50.6%
Good	1,897	36.4%	34.8%
Fair	662	12.7%	11.1%
Bad	185	3.6%	2.7%
Very Bad	51	1%	0.8%

Table 31: Health Status of Residents in Pulborough

Source: Pulborough Neighbourhood Plan



#### A1.3 Housing

From the 2001 Census data, the predominant tenure in Pulborough is owner occupation, with rates much higher than both the rest of the UK and slightly higher than the rest of Horsham District. Pulborough has a higher percentage of both housing association / council rented properties than the Horsham average and also a higher percentage of privately rented properties.

 Table 32:
 Housing tenure in England, Horsham District and Pulborough Parish

Tenure	UK	Horsham	Pulborough
Owner occupied	70%	80%	74%
Housing association / council rent	19%	11%	15%
Private rent	10%	8.5%	11%

Source: Housing Needs Survey Report 2011<sup>15</sup>

While there has been a shift towards more private rented stock tenure there remains a pre-dominance of owner-occupied and larger housing throughout Horsham. The table below highlights the projected household growth for Horsham between 2011 and 2031.

In Pulborough, the majority of the properties in the parish are detached (43.41%) with a slightly smaller number of semi-detached and terraced properties (39.58%). Flats/ maisonettes are fewest in number and make up only 16.04% of the total housing stock. The housing type in Horsham District compared to that of Pulborough Parish is illustrated in the table below.

Housing Type	Horsham District	Pulborough Parish
Detached	20,633 (41%)	896 (43.41%)
Semi-detached / terraced	22,792 (45%)	817 (39.58%)
Flat / Maisonette	6,164 (13.5%)	330 (16.04%)
Second Homes	263 (0.5%)	20 (0.97%)

#### Source: Housing Needs Survey Report 2011

The average house prices in Pulborough have been calculated in the Pulborough Housing Needs Survey. They have been calculated on the base of a 90% mortgage with a 3.5 x gross income lending ratio.

<sup>&</sup>lt;sup>15</sup> Housing Needs Survey Report, Pulborough, Horsham District - Action in rural Sussex 2011



#### Table 34: Average House Prices in Horsham District

Housing Type	Average Price	Income Required
All housing	£303,506	£78,044
Detached	£453,063	£116,501
Semi-detached	£266,077	£68,419
Terraced	£227,599	£58,525
Flat	£157,206	£40,424

#### Source: Housing Needs Survey Report 2011

From the Housing Needs Report for Pulborough, the following has been highlighted:

- 71 (91% of survey respondents) households have an income below £24,999 per annum which is the lowest level income that would be considered for shared ownership housing;
- Seven (9% of survey respondents) households have an income of over £24,999. However, due to their household composition, all of these would be unable to satisfy their needs on the open market and could be considered for shared ownership housing; and
- No household (of the survey respondents) had an income over £40,000.

Based on the figures from the above table, many Pulborough residents do not meet the requirements/ cannot afford to buy a home within the survey study area.

Housing Type	No. of dwellings in Pulborough	% of dwellings in Pulborough	% of dwellings in Horsham
Detached	964	40.3%	38.6%
Semi-Detached	538	22.5%	26.5%
Terraced	416	17.4%	17%
Flats/ apartments	471	19.7%	17.2%
Caravans/ Mobile / Temporary housing	5	0.2%	0.7%

Source: Pulborough Neighbourhood Plan



#### A1.4 Economy and Employment

In Pulborough, the number of economically active residents are recorded at 2,704 (71% of people aged 16-74)<sup>16</sup>. Of these 2,704 people, 36.9% (1,393) are full time employees, 13.7% (521) are part-time and 9.8% (604) are self-employed. There is 1.9% (60) of the working-age group that are Jobseekers Allowance claimants.

The trends of the workforce in Horsham District see that there has been an increase in unemployment and also an increase in the proportion of people who are economically active. The table below shows employment rates by age and sex within the region. Horsham has a very low rate of unemployment (as of 2009 study), of 1.7%.

Industry	Parish Figure 2011	District Figure 2011
Agriculture, Forestry and Fishing	60 (2.3%)	799 (1.2%)
Mining and Quarrying	6 (0.2%)	94 (0.1%)
Manufacturing	198 (7.7%)	5,031 (7.6%)
Electricity, Gas, Steam and Air Conditioning Supply	8 (0.3%)	314 (0.5%)
Water Supply	11 (0.4%)	394 (0.6%)
Construction	219 (8.5%)	5,081 (7.7%)
Wholesale & Retail Trade	438 (17%)	10,195 (15.4%)
Transport & Storage	127 (4.9%)	4,047 (6.1%)
Accommodation and Food Service Activities	113 (4.4%)	2,762 (4.2%)
Real Estate Activities	43 (1.7%)	1,194 (1.8%)
Professional, Scientific and Technical Activities	206 (8%)	5.506 (8.3%)
Administrative and Support Service Activities	154 (6%)	3,738 (5.6%)
Public Administration and Defence	98 (3.8%)	2,948 (4.4%)
Education	235 (9.1%)	6,390 (9.6%)
Human Health and Social Work	263 (10.2%)	6,742 (10.2%)

Table 36: Industry of Employment in Pulborough and Horsham

<sup>&</sup>lt;sup>16</sup> Action with Communities in Rural England (ACRE) Rural Evidence Report – Rural Community Profile for Pulborough (Parish) 2013



Industry	Parish Figure 2011	District Figure 2011
Arts, Entertainment and Recreation	175 (6.8%)	3,616 (5.5%)
Activities of Householders as employees	14 (0.5%)	121 (0.2%)
Activities of Extraterritorial Organisations and Bodies	1 (0.03%)	31 (0.05%)

#### Source: Pulborough Neighbourhood Plan; Stage 1 Report - Part B: Community Evidence

Table 37: Employment Rates by Age and Sex in Horsham

Gender	Year	Aged 16 to 24	Aged 25 to 34	Aged 35 to 49	Aged 50 to 64	Aged 65 and over
Male	2011	60.7%	90.1%	93%	80.5%	17.6%
	2031	60.7%	90.4%	94.1%	85.6%	20.5%
Female	2011	62.4%	80.7%	80.6%	66.3%	9.4%
	2031	62.4%	87.1%	86.8%	77.1%	12.4%

Source: Housing Need in Horsham District, Horsham District Council March 2015

As outlined in Table 10 above, there is a high percentage of residents in Horsham District in higher and intermediate occupations as well as self-employed compared with the national average. Fewer residents are employed within lower occupations or are currently in long-term unemployment.

The largest employment sector in Pulborough is professional or associate level occupations, with 28.3% of the 2,545 people in employment being employed in this field. Although some areas have a proportion of jobs in agriculture, overall the sector makes up only 3% of employment in rural areas, the property and wholesale and retail trade in the largest employer in rural (and urban) areas nationally. The table below highlights the breakdown of job roles within Pulborough.

 Table 38:
 Proportions of the workforce by employment sector in Pulborough

Occupation Type	No. of employees	% of employees	England average %
Retail	440	17%	-
Health and Social Work	265	10%	-
Education	235	9%	-
Managerial Occupations	345	13.4%	12.2%
Professional (or associate) occupations	730	28.3%	30.3%

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Administrative or secretarial occupations	295	11.4%	11.5%
Skilled trades occupations	375	14.5%	11.4%
Elementary occupations	240	9.3%	11.1%

Source: Rural Community Profile for Pulborough 2013

#### A1.5 Biodiversity and Nature Conservation

In recent years, the need for housing development has placed considerable pressure for development on Greenfield land around villages and towns in Horsham District<sup>17</sup>. The Arun Valley Special Protection Area (SAC)/Ramsar consists of three component Sites of Special Scientific Interest (SSSI), Pulborough Brookes SSSIs, Amberley Wild Brooks SSSIs and Waltham Brook SSSI<sup>18</sup>. This is illustrated in figure 7 below. The Plan area is also within the Zone of Influence (ZOI) of the Mens Special Area for Conservation (SAC). Both SACs and SPAs/Ramsar sites are known as 'Habitats Sites' within the NPPF (2019).

In Pulborough, there are six Local Nature Reserves and two SSSIs. There are some Priority Habitat areas that have been identified by Natural England. There are also Ancient & Semi-Natural Woodland and some Traditional Orchard Priority Habitats.

As identified by the South Downs National Park Authority in a consultation response to the previous Pulborough Neighbourhood Plan Regulation 16 consultation, construction of new development could have the potential to "result in likely significant effects upon the barbastelle bats of the Mens SAC via direct habitat loss or disturbances from lighting, noise and vibrations both during construction and operational phases of development"<sup>19</sup>.

Pulborough Parish contains areas identified by Natural England as Priority Habitats and are subject to Habitat Action Plans:

- Four small areas of Undetermined Grassland Priority Habitat located north of Heathcote in the north east corner of the Parish: one opposite Toat Café in the centre; two areas in the south west of the Parish; and one located each side of the Sluice just north of Old Place;
- Several areas of Coastal and Floodplain Grazing Marsh Priority Habitat located along a majority of the southern border with Coldwaltham Parish and West Chiltington Parish. Areas along the full extent of the boundary with Wisborough Green Parish in the north west of the Parish;
- 13 areas of Traditional Orchard Priority Habitat with the greatest number (6) being located in the south east quarter of the Parish to the east of Pulborough. A further 2 are located east of the Nursery on Gay Street Lane. One is at Pythingdean Manor, one at Pallingham Lock Farm, one at Poplar Fruit Farm and one at Chichester College (Brinsbury); and

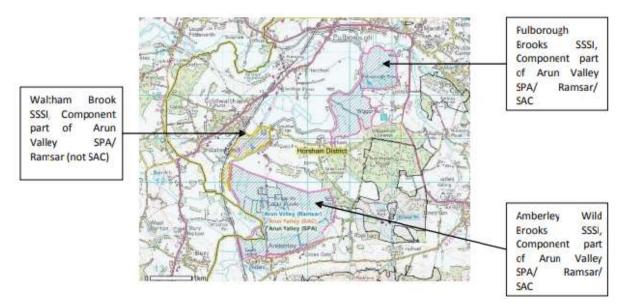
<sup>&</sup>lt;sup>17</sup> Horsham District Landscape Capacity Assessment 2014

<sup>&</sup>lt;sup>18</sup> Habitats Regulations Assessment of the Horsham District Planning Framework 2014

<sup>&</sup>lt;sup>19</sup> Pulborough Neighbourhood Plan Regulation 16 Consultation – South Downs National Park Authority



- Numerous areas of Deciduous Woodland Priority Habitat located in small pockets spread right across the Parish. The greatest concentrations are around Roper's Farm in the south east, north and south of Wiltshire's Farm, east and west of Ham Copse, north east of Toat Farm and at Little Wood<sup>20</sup>.
- Figure 9: Spatial Arrangement of the SSSI components making up the Arun Valley SPA, Ramsar and SAC



Source: Habitats Regulations Assessment of the Horsham District Planning Framework 2014

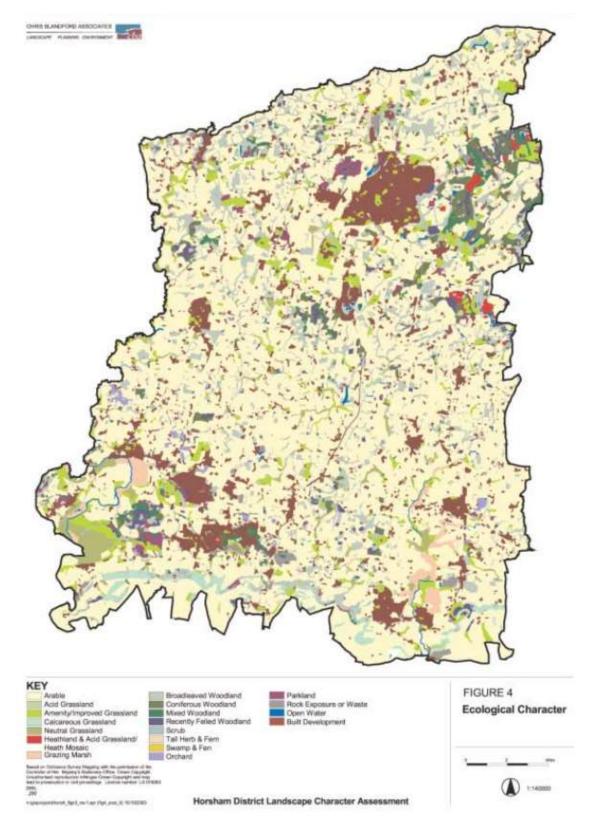
The main issues that will impact biodiversity within Horsham District are the following:

- Increasing temperatures and changes in rainfall patterns through the year are likely to affect local biodiversity including potential loss of 'climate space' within the next 50 years for some species or habitats e.g. wet heath, and certain chalk grassland species, and possible gains for others;
- Potential increased frequency for winter gales, leading to greater storm damage and woodlands;
- Replacement of traditional arable crops by more summer drought tolerant species such as sunflowers and maize;
- Potential increased requirement for irrigation reservoirs to store winter rainfall;
- Potential increased effects of pests and diseases;
- More frequent flooding events;
- Continuing effects of high nutrient run-off pollution on presence/distribution of wild plants; and
- Poor quality surface runoff from areas of built development into adjacent areas.

<sup>&</sup>lt;sup>20</sup> Pulborough Neighbourhood Plan; Stage 1 Report – Part B: Community Evidence 2014







Source: Horsham District Landscape Character Assessment

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## A1.6 Historic Environment

The combination of topographical features, such as the River Arun and Rother tributary, and ancient communication routes, such as Stane Street, led to the development of a settlement at Pulborough. The rare survival of these elemental features remain key attributes of local character<sup>21</sup>. There are over 1,860 Listed Buildings, 37 Conservation Areas, 77 Scheduled Ancient Monuments and 252 sites of archaeological interest in Horsham District<sup>22</sup>. Alongside this, there are numerous historic parks and gardens, some of which include Horsham Park and Leonardslee Gardens. There a few historic structures that are on the 'Heritage at Risk' register due to being in a poor state of repair.

Pulborough is an area well known for its Roman archaeology. There are two Grade I Listed Buildings in the Parish: Stopham Bridge and The Parish Church of St. Mary, and 124 Grade II listed buildings<sup>23</sup>. The historic narrow streets of Pulborough are an issue for accommodating development and relieving traffic; the widening of roads presents a challenge. The Pulborough Conservation Area is bound by existing residential areas to the north, south and eastern edges. The western section abuts the surrounding countryside to the south and northwest, and the eastern section of the Conservation Area extends to the southern settlement edge as seen in the figure below.

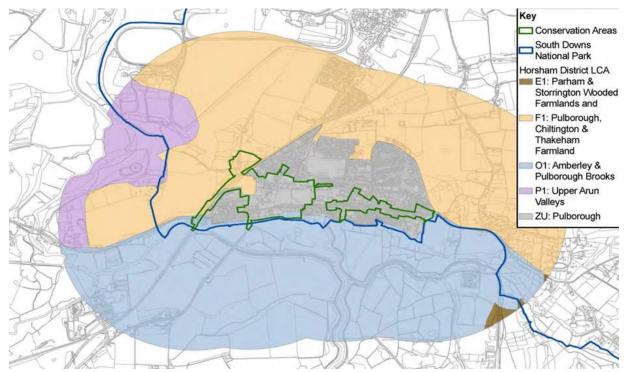


Figure 11: Map of Conservation Area within Pulborough

Source: Pulborough Conservation Area Appraisal and Management Plan 2018

<sup>&</sup>lt;sup>21</sup> Pulborough Conservation Area Appraisal and Management Plan 2018

<sup>&</sup>lt;sup>22</sup> Horsham District Planning Framework (excluding South Downs National Park) – Sustainability Appraisal Environmental Report, 2015

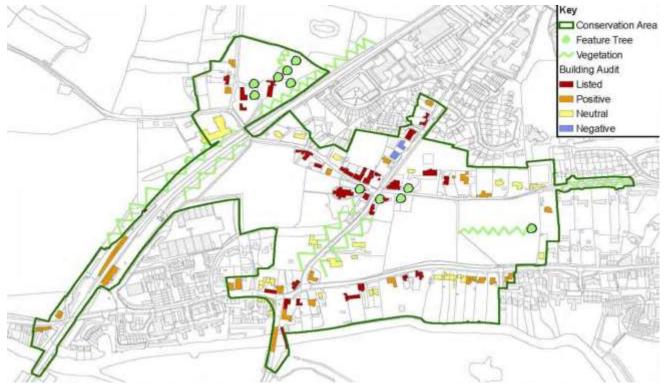
<sup>&</sup>lt;sup>23</sup> Pulborough Conservation Area Appraisal and Management Plan 2018

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The issues of development within the Pulborough Conservation Area are as follows: The presence of modern types of equipment on or around historic buildings, such as large aerials or satellite dishes and micro-generators, can detract from the character of a Conservation Area and/ or the special architectural qualities of buildings. Most buildings within the Pulborough Conservation Area have a variety of boundary walls although in Lower Street and around Swan Corner, some buildings abut the back edge of pavement and there are no front areas. At present, some poorly maintained boundary treatments harm the character and add to the appearance of buildings and the overall street scene, including rear boundaries which are visible in several locations when viewed from the public realm. The loss of front gardens to parking detracts from their historic buildings having their materials decaying or in disrepair, cladding or repainting can be justified. However, these works must be in keeping with the surrounding historic environment. Repointing of brick or stone walls can often ruin and/or change the appearance of these historic features. Within the Conservation Area, the demolition of an unlisted building or wall of a certain volume or height without prior planning permission is a criminal offence and can drastically alter the historic landscape.

#### Figure 12: Map of Historic Features within the Pulborough Conservation Area



Source: Pulborough Conservation Area Appraisal and Management Plan 2018

Key threats to specific historic features within the Pulborough Conservation Area are as follows:

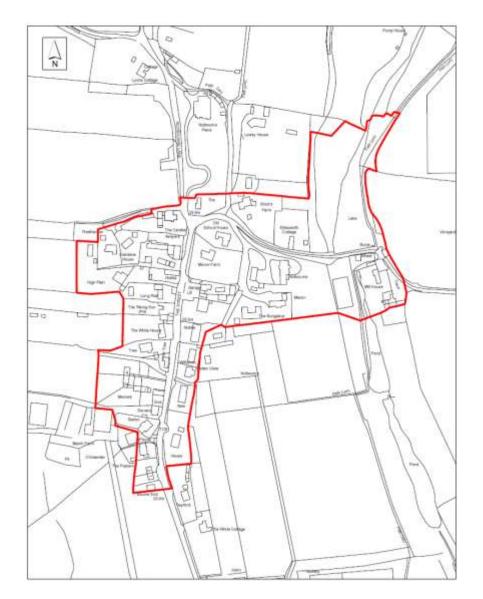
- Redevelopment of sites with rundown buildings such as Swan Corner Shop, Arun Bungalow (originally the Church Rooms) on the junction of Church Hill and Lower Street and the Royal Mail car park on Lower Street and Barnhouse Close with development that is out of context in the Conservation Area;
- Closure of more shops as retail becomes more marginal and the difficulty of retaining the character of the buildings when allowing conversion from retail;



- Loss of traditional joinery details in window and doors and in particular shop fronts, as properties are improved both visually and for thermal upgrading;
- Loss of traditional roof coverings, chimneys and chimneypots on unlisted properties when the roof is replaced. Machine made clay tiles, imported slates and similar through 'natural' materials look different to what is there now;
- Loss of setting relationship between the Conservation Area and the manorial sites of the settlement outside it: The Motte and Bailey Castle in Pulborough Park, the Moat off Link Lane, and New Place; and
- Further erosion of front boundaries on Lower Street and Church Place.

Additionally, the Plan area contains the Nutbourne Conservation Area, as shown in the following figure:

Figure 13: Nutbourne Conservation Area



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Nutbourne is a small linear village situated within the Plan area north of Pulborough. The village street inclines northwards, and although developed on both sides, the general impression is of stone buildings and walls built up to the road frontage on the west, and grassed banks and hedges on the east.

Represented in the village are various styles and periods of architecture, ranging from timber-framed cottages to modern red brick houses. However, all the buildings are of a simple domestic scale and it is this uniformity of scale together with the variety of their massing, design, detailing, texture and irregular positioning and spacing along the road frontage which gives the village its character.

## A1.7 Landscape

The Pulborough Parish Design Statement from 2013 was adopted by the District as a Supplementary Planning Document (SPD) under the Planning & Compulsory Purchase Act, 2004. The document is a material consideration when considering planning applications and has been produced to guide development to uphold the local character of the area in question. The SPD identified a number of character areas relevant to Pulborough, as highlighted in the figure below.

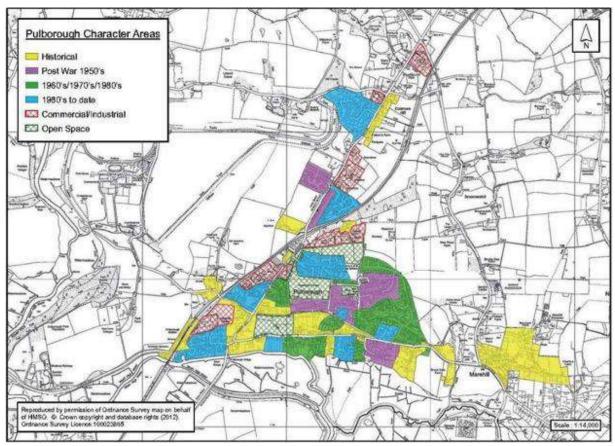


Figure 14: Pulborough Parish Design Statement 2013 - Character Areas

As can be seen from the above, Pulborough has a disparate townscape in places, with historical areas interspersed with more contemporary developments. Of particular note is the dispersed nature of commercial

Source: Pulborough Parish Design Statement 2013



and industrial premises.

The Horsham District Landscape Character Assessment<sup>24</sup> identifies Pulborough within the 'Pulborough, Chiltington and Thakeham Farmlands' character area. The key characteristics of this landscape character area are that: *'it is an undulating mixed farmland landscape of arable and horticulture, with small areas of pasture. It has a varied hedgerow pattern, fragmented in parts with a few small woodlands. Essentially the area retains a rural character; however there is localised visual intrusion from derelict nurseries and small scale industrial areas.' The Landscape Character Assessment goes on to state that the, <i>'overall condition is declining due to loss of hedgerows and increasing traffic on some minor roads.'* As a result, the landscape area has a 'moderate' sensitivity to change however the visually prominent northern escarpment, areas with a stronger existing network of hedgerows, and the sunken lanes have a 'high' sensitivity to change from:

- Large scale housing developments
- Large scale commercial / industrial development
- Minor road improvements
- Decline in traditional land management.

The Landscape Character Assessment adds further the following planning and land management guidelines relevant to Pulborough:

- Conserve the character of the leafy sunken lanes
- Ensure that any small scale housing development in the village responds to traditional street patterns and local design and building materials
- Improve the landscape along the A29 approach to Pulborough
- Conserve and manage the existing hedgerow pattern
- Restore hedgerows and plant new hedgerow trees, particularly in areas of arable farmland
- Extend existing woodland and establish new ones

## A1.7.1 South Downs National Park

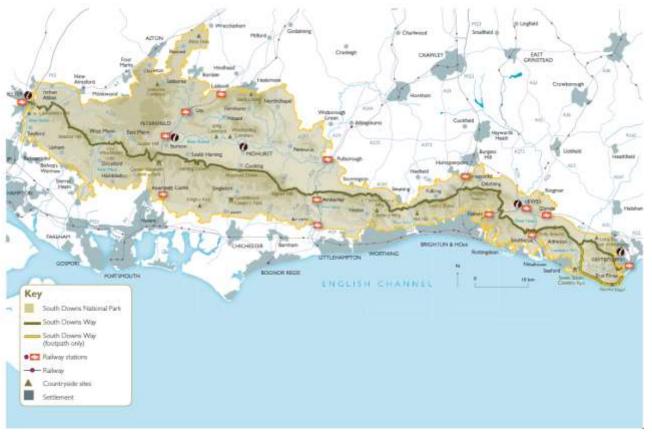
The Neighbourhood Plan area is partly within the South Downs National Park to the south and west. The South Downs National Park covers over 1,600 square kilometres of lowland landscape and has been shaped by the activities of farmers and foresters, large estates and communities, charities and local businesses.

The National Park has huge diversity and is greatly valued, including internationally important wildlife, cultural heritage and market towns and villages. The National park is located in one of the most crowded parts of Britain, and is under pressure from the impacts of development, people, and water extraction. The area now designated as the National Park encompasses living, working, and mostly privately owned and farmed landscapes. It is heavily populated compared to other National Parks. The expansion of the South Downs National Park has placed an increased pressure on areas surrounding it such as Pulborough.

The 'Shaping the future of your South Downs National Park 2014–2019' document outlines the extent of the South Downs National Park in the figure below.

<sup>&</sup>lt;sup>24</sup> Horsham District Landscape Character Assessment, 2003 (Chris Blandford Associates)





#### Figure 15: Map of South Downs National Park

Source: Shaping the future of your South Downs National Park 2014–2019

The South Downs National Park Authority (SDNPA) is the Local Planning Authority for part of the designated Neighbourhood Plan area and the South Downs Local Plan was formally adopted on Tuesday 2<sup>nd</sup> July 2019. Paragraphs 4.5 and 4.6 of the adopted SDNPA Local Plan state that,

- '4.5 The Authority will seek to achieve the right balance between conservation and recreation in the National Park when delivering the purposes of the National Park. However, at times this can cause conflict. To help national park authorities make decisions relating to conservation and recreation, the National Parks Policy Review Committee made a recommendation in 1974, which is now known as 'The Sandford Principle'. This principle was included in the Environment Act 1995 (as amended) which states that: "If it appears that there is a conflict between those purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area".
- 4.6 The Environment Act 1995 (as amended) states that a national park authority, in pursuing the purposes, shall seek to foster the economic and social well-being of local communities within the national park and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the national park.'

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The Core Policies of the SDNPA Local Plan should be factored into both the Neighbourhood Plan (where relevant) and also be strongly considered in the formulation of appropriate SEA Objectives and 'key criteria / questions' in this SEA Scoping Report. It should be noted that previous iterations of the Neighbourhood Plan (in 2015) received consultation comments by the SDNPA covering a range of themes, including:

- The requirement for policy to ensure the integration of sensitive external lighting at allocated sites, in response to the potential impacts on the setting of the National Park and dark night skies.
- The prevention of encroachment into more open landscape within the National Park in accordance with NPPF paragraph 115, which states that all proposals within the National Park must give great weight to conserving the landscape and scenic beauty.
- The negative impacts of urbanising infrastructure.
- As Pulborough is within 7km of the Mens Special Area of Conservation (SAC), the inclusion of additional policy or criteria within the Pulborough NDP is necessary to ensure suitable mitigation measures are undertaken including appropriate bat surveys and protection of key features and habitat.

## A1.7.2 Landscape Capacity

Horsham DC, in collating evidence for a new Local Plan, undertook a Landscape Capacity Assessment in 2014. A Landscape Capacity Assessment is an analysis of the capacity an area has for employment and housing development. The assessment identified several Local Landscape Character Areas in and around Pulborough. These, and the findings of the assessment, are summarised below:

Local Landso	cape Character Area 38: Land East of Pulborough
Landscape Character Sensitivity	<ul> <li>This area is characterised by a valleyside landform with small lakes and a stream running through the centre of the character area.</li> <li>It contains small-medium scale pastures and is enclosed by thick hedgerows and small copses</li> <li>Medieval field pattern in the east of the area</li> <li>It provides a strong green edge to the existing settlement of Pulborough</li> <li>The landscape is in good condition.</li> </ul>
Visual Sensitivity	Whilst the landscape is well enclosed by hedgerows and copses, the elevated landform in parts of the area results in low-moderate sensitivity to housing development. Employment development would be more visually intrusive due to its greater height and scale.
Landscape Value	<ul> <li>Moderate tranquillity due to the A283</li> <li>Adjoins the South Downs National Park.</li> <li>Some public access from footpaths</li> <li>Some ecological from hedgerows and, woodland and aquatic environment</li> </ul>
Landscape Capacity	Due to the areas high landscape character sensitivity with its strong rural character and good landscape condition, together with its moderate-high value it is considered the area has no/low capacity for large scale development in this area.
Assessment	Summary



Local Landscape Character Area 38: Land East of Pulborough			
Sensitivity type	Medium Scale Housing	Large Scale Housing	Large Scale Employment
Landscape Character Sensitivity	High	High	High
Visual Sensitivity	Low-moderate	Low-moderate	Moderate
Combined Landscape Sensitivity	High	High	High
Landscape Value	Moderate	Moderate	Moderate
OVERALL LANDSCAPE CAPACITY	No/Low	No/Low	No/Low

Local Landso	cape Characte	r Area 39: Land North East o	f Pulborough	
Landscape Character Sensitivity	<ul> <li>This area is characterised by gentle to moderate slopes sloping south from a visually prominent ridgeline to the north</li> <li>There is a medium scale field pattern in mainly nursery use</li> <li>The landscape is partially enclosed by hedgerows and tree belts</li> <li>There are some attractive views west to Pulborough Church and southwards towards the South Downs.</li> <li>The higher ground to the north of this area is partly visible from the South Downs.</li> <li>Nursery use and the harsh urban edge have resulted in a poor to moderate condition of the landscape.</li> </ul>			
Visual Sensitivity	Although there is some enclosure of the landform by tree belts, the landform rises towards the north which would result in any development being more visually prominent. There is therefore a moderate-high visual sensitivity to housing and high sensitivity to employment development due to its larger height and scale.			
Landscape Value	<ul> <li>Moderate tranquillity due to urban fringe influences in this area</li> <li>Some public access from footpaths crossing the area.</li> <li>Limited ecological interest</li> </ul>			
Landscape Capacity				
Assessment	Summary			
Sensitivity ty	ре	Medium Scale Housing	Large Scale Housing	Large Scale Employment
Landscape CharacterModerate-HighModerate-HighHighSensitivity		High		



Local Landscape Character Area 39: Land North East of Pulborough			
Visual Sensitivity	Moderate-High	High	High
Combined Landscape Sensitivity	Moderate-High	High	High
Landscape Value	Low-Moderate	Low-Moderate	Low-Moderate
OVERALL LANDSCAPE CAPACITY	Low-Moderate	Low-Moderate	Low-Moderate

Landscape Character Sensitivity	<ul> <li>The topography of this area comprises a gently sloping landform rising to a higher ridge to the north. There is a prominent hill at Pulborough Park in the south of the area.</li> <li>Extensive open grassland used for horse gallops with small to medium arable fields around Pulborough Park. An area of woodland adjoins the northern boundary of the character area.</li> <li>Part of the area provides a strong green gap between the railway line and the southern edge of Stane Street Close. There is some localised urban edge intrusion e.g. at Stane Street Close</li> <li>Although physically separated the landscape contributes to the visual setting of the historic core of Pulborough there are magnificent views of the South Downs and the historic core of Pulborough around the church.</li> <li>Moderate condition of the landscape due to erosion by the Gallops and visual intrusion from Stane Street Close.</li> </ul>
Visual Sensitivity	The land is elevated and very open in nature which results in a high degree of visual sensitivity to development.
Landscape Value	<ul> <li>Moderate tranquillity due to urban edge influences and noise from the adjacent road and rail corridors.</li> <li>The southern part of the landscape character area adjoins the South Downs National Park boundary</li> <li>High amenity value from public rights of way and the wider countryside pursuit of horse gallops.</li> </ul>
Landscape Capacity	The key features and qualities of this landscape area are highly sensitive to large scale development. There is high landscape character sensitivity in terms of distinctive views and its contribution to the visual setting of Pulborough and Codmore Hill. In addition the landscape is of high value due to its proximity to the National Park. It is therefore considered the area has no/low capacity for large scale development.

Sensitivity type	Medium Scale Housing	Large Scale Housing	Large Scale Employment
Landscape Character Sensitivity	High	High	High
Visual Sensitivity	High	High	High
Combined Landscape Sensitivity	High	High	High
Landscape Value	Moderate-High	Moderate-High	Moderate-High



Landscape Character Area 40: Pulborough Park and Gallops			
OVERALL LANDSCAPE	No/Low	No/Low	No/Low
CAPACITY			

Landscape C	Landscape Character Area 41: Old Place			
Landscape Character Sensitivity	<ul><li>Very att</li><li>Forms p</li></ul>	<ul> <li>Very attractive historic settlement pattern e.g. Old Place and cottages</li> <li>Forms part of the landscape setting to of the historic core of Pulborough</li> </ul>		
Visual Sensitivity	Parts of this landscape area can be viewed from surrounding higher land, but there is a degree of enclosure by hedgerows throughout the area. This results in moderate-high sensitivity to housing development and a high sensitivity to larger scale employment development as a result of its greater height and scale.			
Landscape Value	<ul> <li>Moderate-high tranquillity with a few urban influences along the eastern boundary.</li> <li>Ecological interest of large pond and stream (designated as an SNCI)</li> <li>Historic interest of Old Place, which forms part of the Conservation Area of Pulborough</li> <li>A right of way passes through Old Place</li> </ul>			
Landscape Capacity	Due to the areas high landscape character sensitivity including the unspoilt rural character and good condition, together the historical interest and visual sensitivity, it is considered that there is of this area result in no / low capacity for large scale development in this area.			
Assessment	Summary			
Sensitivity ty	ре	Medium Scale Housing	Large Scale Housing	Large Scale Employment
Landscape Ch Sensitivity	naracter	High	High	High
Visual Sensitivity		Moderate -High	Moderate -High	High
Combined Lar Sensitivity	ndscape	High	High	High
Landscape Va	lue	Moderate	Moderate	Moderate
OVERALL LANDSCAPE CAPACITY		No/Low	No/Low	No/Low

Landscape Character Area 42: Codmore Hill and Environs		
Landscape Character	• This area forms a visually prominent valleyside landform below the small scale ridge development at Codmore Hill.	
Sensitivity	There is a soft indented edge to Codmore Hill	
	• There is a small-medium scale field pattern, creating an unspoilt rural character. The landscape is	

in good condition.



#### Landscape Character Area 42: Codmore Hill and Environs

Visual Sensitivity	Key landscape features and qualities are highly sensitive to large scale development. Although there is partial enclosure in this area, provided by hedgerows and hedgerow trees the visually prominent valley sides mean that development would result in any development being visible from the surrounding area. This results in a moderate–high degree of visual sensitivity to development.			
Landscape Value	Amenity	Amenity value from footpaths crossing the area		
Landscape Capacity	Due to the areas high landscape character sensitivity which arises from the mostly unspoilt rural character in good condition together with the visual sensitivity of the valley sides to development, it is considered there is no/low capacity for large scale development.			
Assessment	Assessment Summary			
Sensitivity ty	ре	Medium Scale Housing	Large Scale Housing	Large Scale Employment

Landscape Character Sensitivity	High	High	High
Visual Sensitivity	Moderate-high	Moderate-high	Moderate-high
Combined Landscape Sensitivity	High	High	High
Landscape Value	Low-Moderate	Low-Moderate	Low-Moderate
OVERALL LANDSCAPE CAPACITY	No/Low	No/Low	No/Low

Landscape C	character Area 43: North Heath and surrounds
Landscape Character Sensitivity	<ul> <li>This landscape area has a very gently undulating landform extending from a prominent sandstone ridge along the southern edge of the character area</li> <li>The area comprises mainly small-medium scale regular and irregular, hedgerow-ed field pattern along with the dispersed roadside settlement of North Heath</li> <li>There are some urban fringe influences along the A29 and railway but a strong rural character away from it.</li> <li>Overall it makes a valuable contribution to the extensive green gap between Pulborough and Billingshurst, despite some localised ribbon development on the A29</li> <li>Overall moderate landscape condition due to urban influences along the A29.</li> </ul>
Visual Sensitivity	The area is highly visible from the ridge on its southern boundary and any development would therefore visible from the wider surroundings. Within the character area the hedgerow network would limit the visibility of housing, but employment development would be more apparent due to its greater height and scale.
Landscape Value	<ul> <li>Moderate tranquillity due to the noise influence of the A29</li> <li>There may be some ecological interest from hedgerows in the area.</li> <li>Limited amenity value with few public footpaths in the area.</li> </ul>



#### Landscape Character Area 43: North Heath and surrounds

Landscape There is some limited capacity for large scale housing development in this area, due in part to the moderate landscape condition and existing urban influences close to the A29. However, the potential visual impact of development from the ridge to the south of the area and the small scale settlement pattern in the area would limit the capacity for development away from the A29 corridor and care would be needed to avoid the appearance of ribbon development. Large scale employment development would likely to be very visually conspicuous from the ridge and as a result there is low capacity for this type of development.

Assessment Summary			
Sensitivity type	Medium Scale Housing	Large Scale Housing	Large Scale Employment
Landscape Character Sensitivity	Moderate-High	Moderate-High	Moderate-High
Visual Sensitivity	Moderate-High	Moderate-High	High
Combined Landscape Sensitivity	Moderate-High	Moderate-High	High
Landscape Value	Low-Moderate	Low-Moderate	Low-Moderate
OVERALL LANDSCAPE CAPACITY	Low-Moderate	Low-Moderate	Low-Moderate

Landscape C	haracter Area	44: Land north of Gay Stree	t Lane	
Landscape Character Sensitivity	<ul><li>promine</li><li>There is and hec</li><li>Unspoil</li></ul>	ent ridge to the south of the cha	r field pattern of pasture fields e medieval field pattern. cape in good condition	-
Visual Sensitivity				nousing, although
Landscape Value	<ul> <li>Moderate to high tranquillity due to the lack of urban influences</li> <li>Some ecological interest from hedgerows and shaws.</li> <li>Limited amenity value with few public footpaths in the area.</li> </ul>			
Landscape Due to the areas high landscape character sensitivity, resulting from the unspoilt rural landscape which is in good condition, together with the high visual sensitivity arising from the visibility of the area from the ridge to the south, the area is considered to have no capacity for large scale development.				
Assessment	Summary			
Sensitivity ty	ре	Medium Scale Housing	Large Scale Housing	Large Scale Employment



Landscape Character Area 44: Land north of Gay Street Lane			
Landscape Character Sensitivity	High	High	High
Visual Sensitivity	Moderate -High	Moderate -High	Moderate -High
Combined Landscape Sensitivity	High	High	High
Landscape Value	Moderate	Moderate	Moderate
OVERALL LANDSCAPE CAPACITY	No/Low	No/Low	No/Low

Local Landso	cape Characte	r Area 45: Brinsbury College	and surrounds	
Landscape Character Sensitivity	<ul> <li>The topography of this area is of a flat to very gently undulating landform with a medium- large scale arable field pattern.</li> <li>There is some partial enclosure by tree belts and woodland</li> <li>The road/rail corridor of the A29 is present in this area although there is still a rural character</li> <li>The landscape is in poor condition in parts, particularly close to the A29, but also due to the large scale arable fields and degraded hedgerow pattern</li> </ul>			
Visual Sensitivity	The visual sensitivity of this area to housing is moderate as there is some enclosure of the landscape from the tree and woodland belts. Employment development would be more visually intrusive due to its greater scale and height.			
Landscape Value	<ul> <li>Low-moderate tranquility to the presence of the A29 in part of the area</li> <li>Some ecological value and archaeological interest from areas of ancient woodland and an archaeological site.</li> <li>Low amenity value due to limited public footpath network</li> </ul>			
Landscape Capacity There is moderate capacity for large scale housing development due to the low-moderate landscape character sensitivity, with few of the landscape features and qualities sensitive to large scale development, coupled with the low-moderate landscape value. It is however considered that if development were to extend too far east, development could be perceived as having unacceptable impact on the rural character which becomes more apparent in this part of the landscape character area. There is some limited capacity for employment development which logically would be restricted to a small area around the Brinsbury Campus of Chichester College.				
Assessment Summary				
Sensitivity ty	ре	Medium Scale Housing	Large Scale Housing	Large Scale Employment
Landscape Ch	aracter	Low-Moderate	Low-Moderate	Low-Moderate

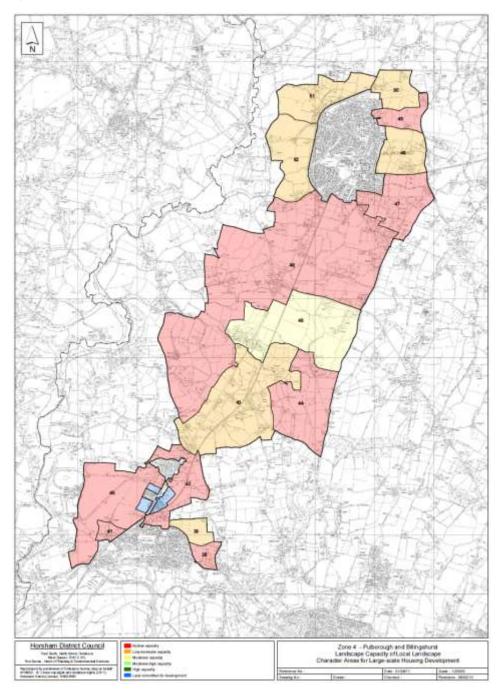
Sensitivity type	Medium Scale Housing	Large Scale Housing	Large Scale Employment
Landscape Character Sensitivity	Low-Moderate	Low-Moderate	Low-Moderate
Visual Sensitivity	Low-Moderate	Moderate	Moderate-High
Combined Landscape Sensitivity	Low-Moderate	Moderate	Moderate-High
Landscape Value	Low-Moderate	Low-Moderate	Low-Moderate



Local Landscape Character Area 45: Brinsbury College and surrounds			
OVERALL LANDSCAPE CAPACITY	Moderate-High	Moderate	Low-Moderate

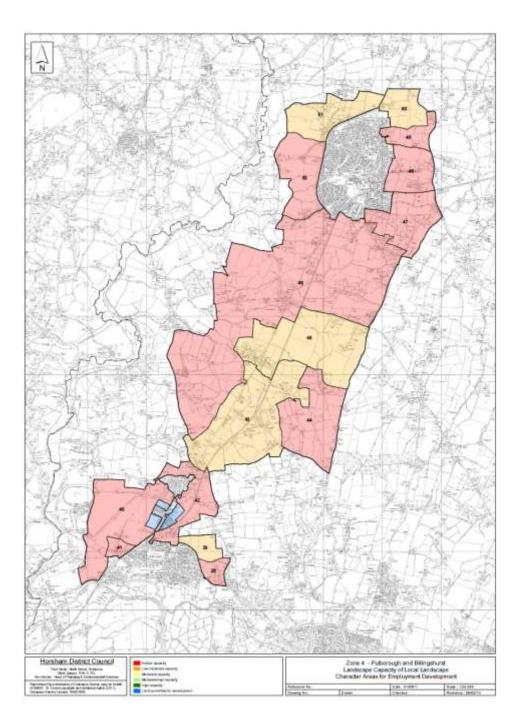
The following figures show the extent of the above Local Landscape Character Areas in and around the Pulborough Neighbourhood Plan area, and their corresponding overall landscape sensitivity to large scale housing and employment respectively.

Figure 16: Pulborough and Billingshurst Landscape Capacity of Local Landscape Character Areas for Largescale Housing Development





#### Figure 17: Pulborough and Billingshurst Landscape Capacity of Local Landscape Character Areas for Employment Development



Source: Horsham District Council, 2013



## A1.8 Water Environment

Data for Pulborough on the state of the water environment is scarce; therefore statistics for Horsham District have been used as a general indicator. Water supply in Horsham District comes from a mixture of river and groundwater sources, principally through the Hardham Treatment works<sup>25</sup>. Groundwater levels in the District may come under increasing pressure in the future. Increases in population size are likely to increase the demand for water that needs to be abstracted. Much of the groundwater under the southern region of the District (such as Storrington, Steyning and Pulborough) forms a major aquifer.

The River Arun has low summer flows and so, any deterioration in water quality could affect the Arun Valley SPA. Approximately 6.5% of the total administrative area of Horsham is within the functional floodplain, including 1.18% of the existing development<sup>26</sup>.

Water supply is provided by Southern Water (covers Crawley, Horsham and a small area of Mid Sussex). Public sewerage services are supplied to small areas of Horsham and Mid Sussex and all of Crawley and Reigate and Banstead by Thames Water. Southern Water provides public sewerage services to most of Mid Sussex and the extent of Horsham that falls within the study area<sup>27</sup>.

Horsham District Council has a total administrative area of 529km<sup>2</sup>. Of the total area, 5.93% (31.35km<sup>2</sup>) is located within Flood Zone 3b (Functional Floodplain) whilst 1.20% (6.34km<sup>2</sup>) is located in Flood Zone 3a (High Risk) and 0.18% (0.97km<sup>2</sup>) is located within Flood Zone 2<sup>28</sup>. The broad-scale and settlement-level assessments clearly show that, whilst flood risk exists in areas of the District, it does not pose a widespread and significant issue for the allocation of development. The figures below highlight the main rivers within West Sussex and their tributaries.

The frequency and duration of winter flooding at Pulborough Brooks has increased significantly in the last twenty years while 2012 recorded the first extended summer flooding. The causes of increased flooding are believed to include the effects of climate change and land-use changes in the catchment such as building on flood plains and faster run-off from hard surfaces associated with development<sup>29</sup>.

The River Arun & Rothers catchment covers 1,490 square kilometres (575 square miles, 149,000 hectares or over 368,000 acres). It is dominated by the chalk ridge of the South Downs and the sand and clay of the Weald rolling down to the Chichester plain and the coast. The two main rivers, the Arun and the Western Rother, flow through some of the most picturesque countryside in the South of England. The Arun from its source near Horsham runs south to Pulborough where it is joined by the Rother which has its origins in Hampshire.

<sup>&</sup>lt;sup>25</sup> Habitats Regulations Assessment of the Horsham District Planning Framework, 2014

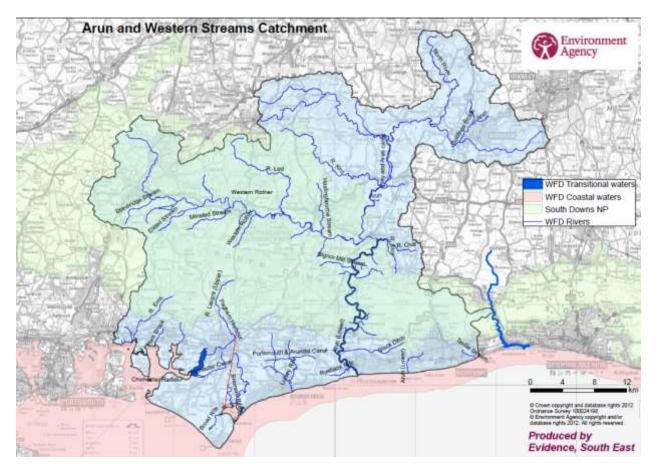
<sup>&</sup>lt;sup>26</sup> Horsham District Planning Framework (excluding South Downs National Park) – Sustainability Appraisal Environmental Report, 2015

<sup>&</sup>lt;sup>27</sup> Gatwick Sub Region; Outline Water Cycle Study Final Report, 2011

<sup>&</sup>lt;sup>28</sup> Strategic Flood Risk Assessment – Final Report 2007

<sup>&</sup>lt;sup>29</sup> Habitats Regulations Assessment of the Horsham District Planning Framework 2014





#### Figure 18: Map of the River Arun and its tributaries

Source: Arun & Rothers Rivers Trust

## A1.9 Transport and Connectivity

Data for Pulborough on transport and connectivity is scarce; therefore statistics for Horsham District have been used as a general indicator. There were a total of 26.8 million passenger journeys on buses (both commercial and contracted services) in West Sussex during 2013/14, and approximate increase of 1.9% from 2011/12<sup>30</sup>. In Horsham District, 49% of commuters use the private car to make their journeys, compared to the national average of 40%<sup>31</sup>.

The A29 Stane Street is a well-used primary route between London and the South Coast and whilst it has improved over the years, it still is a single carriageway road for most of its length. The A29 passes through Pulborough and there are a number of constraints where the road is below modern standards for route carrying such a heavy volume of traffic. These constraints are particularly noticeable at Swan Corner (where the A29 and A283 meet), Church Hill and Sopers Hill<sup>32</sup>. The potential for road improvements at all of these locations is seriously constrained by the proximity of historic dwellings, steep embankments and a railway

<sup>30</sup> West Sussex Life – Transport 2014

<sup>&</sup>lt;sup>31</sup> West Sussex Life – Transport 2014

<sup>&</sup>lt;sup>32</sup> Pulborough Village Transport Plan, 2010

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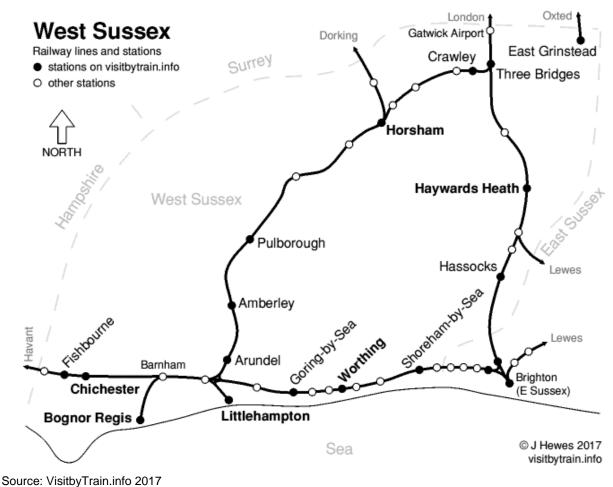


bridge. Despite efforts to lower the volume of traffic passing through by West Sussex County, traffic volumes are still high. As highlighted throughout the Village Transport Plan process (throughout January 2009), the A29 carried up to 11,000 vehicles per day.

West Sussex County Council (along with Horsham District Council, Network Rail and Southern Rail) is working with the bus companies and other community bus providers to improve services to Pulborough where possible and to improve access to these services. The main railway lines throughout West Sussex are illustrated in figure 8 below. The A29 and A283 routes in Pulborough are particularly difficult for cyclists to use due to the volume of traffic and uneven surfaces. The existing pedestrian links in Pulborough are far from satisfactory, particularly in the historical areas of the village that generate the most pedestrian movement. The roads throughout Pulborough are very narrow, making it difficult to accommodate vehicles. The traffic count suggests that two recent supermarkets in London Road are major attractors of traffic, especially from the north and east of the village as well as within the village itself<sup>33</sup>. The number of people who regularly cycle to work in Horsham is 1,076 (1.1% of population) based on 2011 Census figures.

The number of road casualties in Horsham District has increased from 277 in 2012/13 to 322 in 2013/14<sup>34</sup>.

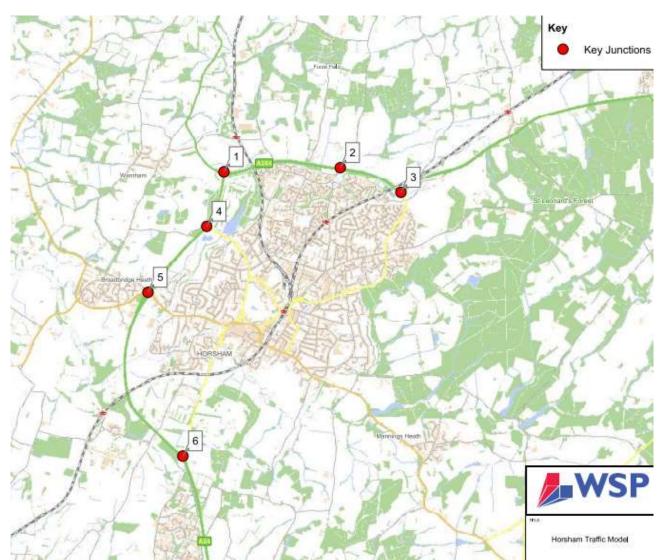
Figure 19: Railway lines and railway stations in West Sussex



<sup>33</sup> Pulborough Village Transport Plan 2010

<sup>34</sup> West Sussex Life – Transport 2014





#### Figure 20: Horsham traffic Model – Key junctions

Source: Horsham District Transport and Development Study<sup>35</sup>

## A1.10 Air Quality & Noise

Data for Pulborough on the levels of air quality and noise within the Parish is scarce; therefore statistics for Horsham District have been used as a general indicator. The Local Air Quality Management Progress report 2011 identified that Pulborough has high levels of NO<sub>2</sub> in one part of the village. The total number of noise complaints throughout Horsham District from all sources in 2008/9 was 255 and is broadly stable when compared with data from previous years<sup>36</sup>. The north east of Horsham District is close to Gatwick Airport, thus resulting in high levels of noise pollution from air traffic.

Horsham District aims to reduce carbon dioxide emissions by 26% up to 2020 and by 80% by 2050 (against

<sup>&</sup>lt;sup>35</sup> Horsham District Transport and Development Study; Deliverable D5 – Final Report 2014

<sup>&</sup>lt;sup>36</sup> Horsham District Planning Framework (excluding South Downs National Park) – Sustainability Appraisal Environmental Report, 2015

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a 1990 baseline)<sup>37</sup> as outlined in their Climate Change Strategy 2009. Data from 2006 shows that:

- Horsham District had the highest tonnage of carbon dioxide emitted compared with all the district/borough Councils in West Sussex (a total of 968kt CO<sub>2</sub>);
- Emissions fell slightly between 2005 and 2006 (from 983kt CO2 to 968ktCO2); and
- Per capita, emissions were the third highest in West Sussex (with 7.5 tonnes per capita).

Carbon emissions for Horsham District were spread across three sectors with 34% coming from industry and commerce, 34% coming from Domestic and 32% resultant from Transport. In Horsham, 77% of air pollution is produced by motor vehicles.

Noise maps<sup>38</sup> indicate that there are noise pollution issues within Pulborough associated with the A29 London Road. Average road traffic noise levels of 70.0 - 74.9 decibels can be experienced along this stretch of road, with noise dissipating outwards from the road itself. There are similar issues surrounding the railway line, with average rail traffic noise levels of generally up to 60.0 - 64.9 decibels in the day, with small pockets of the line within the Plan area that experience levels of 65.0 - 69.9 decibels.

In the village of Storrington, a village to the south east of the Plan area accessible from Pulborough via the A283, an Air Quality Management Area (AQMA) has been in effect in since December 2010 in areas of the village that are likely to exceed the air quality objective for nitrogen dioxide. All AQMAs are required to have an Air Quality Action Plan that reviews all possible pollution reduction measures and assesses them in terms of pollution reduction, acceptability, cost effectiveness and feasibility.

Storrington's Air Quality Action Plan has been developed in partnership with West Sussex County Highways Department. It is reviewed every 12 months as part of the annual progress reporting schedule required by the Department for Environment, Food and Rural Affairs (DEFRA). The measures recently taken forward for implementation to reduce traffic congestion and to aid air quality improvement in Storrington are:

- Weight restriction for lorries on B2139 Manleys Hill between the A283 Manleys Hill/High St miniroundabout and Mill Lane car park entrance within the Storrington AQMA; and
- Restrictions for waiting, loading and unloading at any time on sections of North Street, The Square and West Street in Storrington.

## A1.11 Material Assets

Data for Pulborough on material assets within the Parish is scarce; therefore statistics for Horsham District have been used as a general indicator. There are currently 10 licensed landfill sites operating in Horsham District. There are eight registered waste sites that residents can dispose of or recycle their waste. Recycling rates in Horsham are higher than the national average, with 48.22% of total household waste being recycled or composted. The Acorn scheme means that household waste no longer needs to be sorted by the householder, as all recyclable items can be placed in the same bin, taken to a Materials Recycling Facility (MRF) where the recyclables can be sorted and sold. This scheme aims to recycle 60% of all domestic waste. According to 2007 figures, West Sussex households priced 450,000 tonnes of rubbish<sup>39</sup>.

The most important minerals within West Sussex include crushed rock, and sand and gravel (aggregates),

<sup>&</sup>lt;sup>37</sup> Acting Together on Climate Change; A Strategy for the Horsham District 2009

<sup>&</sup>lt;sup>38</sup> Extrium (http://www.extrium.co.uk/noiseviewer.html)

<sup>&</sup>lt;sup>39</sup> Acting Together on Climate Change; A Strategy for the Horsham District 2009



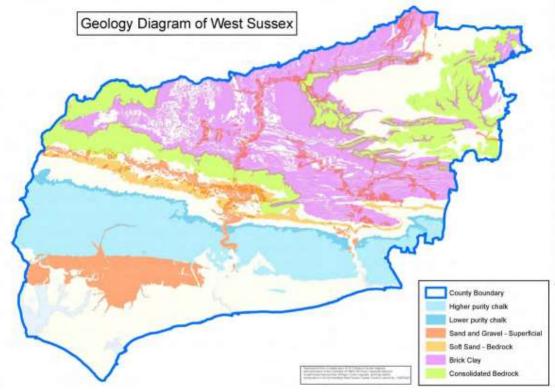
clay, chalk, silica sand, oil and gas. The geology of West Sussex and the supplies of aggregates in West Sussex are illustrated in the figures below. The geology of West Sussex is a sequence of broad zones from the south to the North-East of the county which comprises of:

- Brickearth, London Clay and gravels along the coastal plain;
- The chalks of the South Downs;
- Various beds forming the Upper Greensand, Gault Clay and Lower Greensand to the north of the chalk downs;
- The clay area of the Low Weald; and
- A mixed area of sandstones and clays forming part of the High Weald in a triangle between Horsham, East Grinstead and Burgess Hill.

The West Sussex Joint Minerals Local Plan<sup>40</sup> outlines strategic objectives outline aims to:

- Promote the prudent and efficient production and use of minerals and to ensure a steady and adequate supply, having regard to the market demand and constraints on supply in the Plan area and;
- Maximise and prioritise the supply and use of secondary and recycled aggregates before supply and use of primary sources. In particular to reduce reliance on land-won aggregates.

Figure 21: Map of the Geology of West Sussex

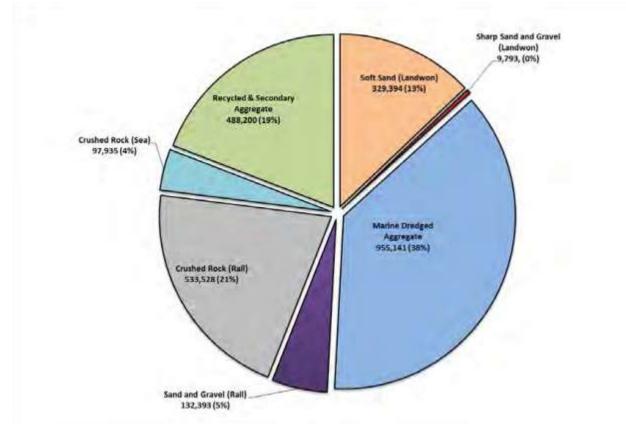


Source: West Sussex Joint Minerals Local Plan 2018

<sup>&</sup>lt;sup>40</sup> West Sussex Joint Minerals Local Plan 2018



#### Figure 22: Supplies of Aggregates in West Sussex



Source: West Sussex Joint Minerals Local Plan 2018

As identified within the West Sussex Joint Minerals Local Plan, 2018 (adopted by West Sussex County Council and the South Downs National Park Authority) Pulborough is located within the following Minerals Safeguarding Areas (MSAs):

- Soft Sand (including potential Silica Sand) Mineral Safeguarding Area (including 250m buffer)
- Brick Clay (weald Clay Formation) Resource Mineral Safeguarding Area (including 250m buffer)
- Building Stone Mineral Safeguarding Area (including 250m buffer)

The West Sussex Joint Minerals Local Plan safeguarding strategy is to ensure that the sand and gravel, chalk, clay and sandstone resources are appropriately safeguarded in order that the potential sterilisation of important minerals is considered alongside other land uses when a planning application is being considered.

For those parts of the Neighbourhood Plan area within the South Downs National Park minerals resources will be safeguarded and exploited in a manner which only sees minerals development within the South Downs National Park (SDNP) and Areas of Outstanding Natural Beauty take place in exceptional circumstances and where it is in the public interest.

The Joint Minerals Local Plan Policy M9: Safeguarding Minerals sets out safeguarding procedures, which have implications for future development in Pulborough. This policy is reiterated below:



#### Policy M9: Safeguarding Minerals

- (a) Existing minerals extraction sites will be safeguarded against non-mineral development that prejudices their ability to supply minerals in the manner associated with the permitted activities.
- (b) Soft sand (including potential silica sand), sharp sand and gravel, brick-making clay, building stone resources and chalk reserves are safeguarded against sterilisation.
   Proposals for non-mineral development within the Minerals Safeguarded Areas (as shown on maps in Appendix E) will not be permitted unless:
  - (i) Mineral sterilisation will not occur; or
  - (ii) it is appropriate and practicable to extract the mineral prior to the development taking place, having regards to the other policies in this Plan; or
  - (iii) the overriding need for the development outweighs the safeguarding of the mineral and it has been demonstrated that prior extraction is not practicable or environmentally feasible.

Soil quality in the Plan area is a mix of Grade 3 (Good to Moderate) and Grade 4 (Poor). Grade 3 soils represent the best and most versatile agricultural land in the wider District, however not within the wider County, with Grade 2 (Very Good) soils present.

## A1.12 Data Limitations

Some relevant information is not available for the Plan area on a particularly detailed basis on all sustainability themes. As a result, there are some quantitative gaps within the data set which would ideally have been identified. It is believed however that the available information shows a comprehensive view on sustainability within the Plan area as of the beginning of December 2019.



# Appendix 2: Review of Plans & Programmes

As previously mentioned in Section 3 of this Report, the SEA Directive requires the production of the following information:

*"an outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes;" Annex 1(a); and* 

"the environmental protection objectives, established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;" Annex 1(e).

The following tables outline a summary of the key objectives of those plans and programmes relevant to the Neighbourhood Plan, ranging from the international – local level, and also those relevant for SEA.

## A2.1 International Plans & Programmes

International Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
European Commission (EC) (2011)	<ul> <li>The policy aims to enjoy the benefits of a resource-efficient and low-carbon economy, through achieving three conditions:</li> <li>First, to take coordinated action in a wide range of policy areas and this action needs political visibility and support.</li> <li>Second, act urgently due to long investment lead-times. While some actions will have a positive impact on growth and jobs in the short-term, others require an upfront investment and have long pay-back times, but will bring real economic benefits for the EU economy for decades to come.</li> <li>Third, to empower consumers to move to resource-efficient consumption, to drive continuous innovation and ensure that efficiency gains are not lost.</li> </ul>	The Neighbourhood Plan should incorporate these principles into the local scale development strategy in order to create targets that will contribute to the targets outlined by the EU. In this way, the Neighbourhood Plan will assist in facilitating similar benefits as those described in the EC policy for the population of Pulborough.
European Landscape Convention 2002	The aims of this Convention are to promote landscape protection, management and planning, and to organise European co-operation on landscape issues.	In order to co-operate on matters concerning landscape conservation and protection, the Neighbourhood Plan will need to consult with this policy to inform practices of development and

 Table 39:
 Contextual Review of International Plans and Programmes



International Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
		avoid substantial harm to protected landscapes.
European Union Water Framework Directive 2000	<ul> <li>The framework amalgamates multiple directives into one to provide the operational tool for water treatment, setting the objectives for water protection for the future. Directives included in the framework are: <ul> <li>the Urban Waste Water Treatment Directive, providing for secondary (biological) waste water treatment, and even more stringent treatment where necessary.</li> <li>the Nitrates Directive, addressing water pollution by nitrates from agriculture.</li> <li>a new Drinking Water Directive, reviewing the quality standards and, where necessary, tightening them (adopted November 1998),</li> <li>a Directive for Integrated Pollution and Prevention Control (IPPC), adopted in 1996, addressing pollution from large industrial installations.</li> </ul> </li> </ul>	Treatment and recycling water in this way is a necessity for developments over a population threshold to adhere to the EU directive. The Neighbourhood Plan may need to consider waste water provisions and considerations for the EU water framework when allocating new developments to align with the approach defined in the directive. Complying with all aspects and directives ensures that the Neighbourhood Plan will not have a detrimental effect on water courses in the Plan area.
European Directive concerning urban waste-water treatment 1991	<ul> <li>The Directive requires:</li> <li>The Collection and treatment of waste water in all agglomerations of more than 2000 population equivalents (p.e.);</li> <li>Secondary treatment of all discharges from agglomerations of more than 2000 p.e., and more advanced treatment for agglomerations more than10,000 population equivalents in designated sensitive areas and their catchments;</li> <li>A requirement for pre-authorisation of all discharges of urban wastewater, of discharges from the food-processing industry and of industrial discharges into urban wastewater collection systems;</li> <li>Monitoring of the performance of treatment plants and receiving waters; and</li> <li>Controls of sewage sludge disposal and re-use, and treated waste water re-use whenever it is appropriate.</li> </ul>	Treatment and recycling water in this way is a necessity for developments over a population threshold to adhere to the EU directive. The Neighbourhood Plan may need to include waste water provisions when allocating new developments to align with the approach defined in the directive.
European Union Nitrates Directive 1991	The Nitrates Directive (1991) aims to protect water quality across Europe by preventing nitrates from agricultural sources polluting ground and surface waters and by promoting the use of good farming practices.	Treatment of waste water in this way is a necessity for developments over a population size threshold to adhere to the EU directive. The Neighbourhood Plan may need

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International Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
		to include Nitrate retention provisions when allocating new developments to align with the approach defined in the directive.
European Union Noise Directive 2002	<ul> <li>The aim of this Directive shall be to define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise. To that end the following actions shall be implemented progressively: <ul> <li>a) the determination of exposure to environmental noise, through noise mapping, by methods of assessment common to the Member States;</li> <li>b) ensuring that information on environmental noise and its effects is made available to the public;</li> <li>c) adoption of action plans by the Member States, based upon noise-mapping results, with a view to preventing and reducing environmental noise where necessary and particularly where exposure levels can induce harmful effects on human health and to preserving environmental noise quality where it is good.</li> </ul> </li> <li>This Directive shall also aim at providing a basis for developing Community measures to reduce noise emitted by the major sources, in particular road and rail vehicles and infrastructure, aircraft, outdoor and industrial equipment and mobile machinery.</li> </ul>	The Neighbourhood Plan may need to consider this strategy to noise pollution when formulating policy for the Plan area. In special relation to A-roads and the railway line as two sources of significant noise pollution, considerations may be needed in the Neighbourhood Plan for the proximity of developments to significant sources of noise pollution and any mitigating measures which could be employed to minimise the impact on the local population.
European Union Floods Directive 2007	The purpose of this Directive is to establish a framework for the assessment and management of flood risks, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods in the Community.	Flood risk policy in the Neighbourhood Plan should be informed by the approach within the EU Floods Directive in order to align with European practices for flood prevention and management. The Neighbourhood Plan must contain significant considerations for the impact of flooding on the local population and the most effective ways to mitigate against flooding, which can be extrapolated and applied to a local context from the EU directive.



International Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
European Union Air Quality Directive 2008 including previous versions.	<ul> <li>Council Directive 96/62/EC on ambient air quality assessment and management.</li> <li>Council Directive 1999/30/EC relating to limit values for sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air.</li> <li>Directive 2000/69/EC of the European Parliament and of the Council relating to limit values for benzene and carbon monoxide in ambient air.</li> <li>Directive 2002/3/EC of the European Parliament and of the Council relating to ozone in ambient air.</li> <li>Directive 2002/3/EC of the European Parliament and of the Council relating to ozone in ambient air.</li> <li>This new Directive includes the following key elements: <ul> <li>that most of existing legislation be merged into a single directive (except for the fourth daughter directive) with no change to existing air quality objectives*</li> </ul> </li> <li>New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target</li> <li>the possibility to discount natural sources of pollution when assessing compliance against limit values</li> <li>possibility for time extensions of three years (PM10) or up to five years (NO2, benzene) for complying with limit values, based on conditions and the assessment by the European Commission.</li> <li>* Framework Directive 96/62/EC, 1-3 daughter Directives 1999/30/EC, 2000/69/EC, 2002/3/EC, and Decision on Exchange of Information 97/101/EC.</li> </ul>	Air quality management principles relating to the range of pollutant gases outlines within the EU Air Quality Directive are a required consideration for the Pulborough Neighbourhood Plan to counteract emissions within the Plan area. The Neighbourhood Plan may need to adopt mitigation approaches to minimise the impact of the allocation of new developments, increased energy consumption and road usage in the locality.
European Union Directive on the Conservation of Wild Birds 2009	This Directive relates to the conservation of all species of naturally occurring birds in the wild state in the European territory of the Member States to which the Treaty applies. It covers the protection, management and control of these species and lays down rules for their exploitation. It shall apply to birds, their eggs, nests and habitats.	Conservation of bird species must be incorporated in ecological considerations when assessing the viability of a development. The Neighbourhood Plan, in conjunction with this EU directive, should evaluate the impact on bird habitats and include this consideration in the environmental assessment of potential sites.
European Union Directive on the Conservation of	The aim of this Directive shall be to contribute towards ensuring bio-diversity through the conservation of natural	The Neighbourhood Plan should seek to ensure the conservation of habitats supporting ecological



International Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Natural Habitats and of Wild Fauna and Flora 1992	habitats and of wild fauna and flora in the European territory of the Member States to which the Treaty applies.	variance. This directive can inform the approach utilised in Pulborough for the protection of ecologically significant sites.
European Union Biodiversity Strategy to 2020	<ul> <li>This strategy aims to conserve biodiversity within Europe in an attempt to achieve the following target and vision:</li> <li>2020 headline target <ul> <li>Halting the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restoring them in so far as feasible, while stepping up the EU contribution to averting global biodiversity loss.</li> </ul> </li> <li>2050 vision <ul> <li>By 2050, European Union biodiversity and the ecosystem services it provides — its natural capital — are protected, valued and appropriately restored for biodiversity's intrinsic value and for their essential contribution to human wellbeing and economic prosperity, and so that catastrophic changes caused by the loss of biodiversity are avoided.</li> </ul> </li> </ul>	The Neighbourhood Plan should assess the impact of developments on the environment and biodiversity and include this consideration as a factor when evaluating the suitability of a site for development. This strategy provides the stance to development which does not negatively impact on biodiversity and the Neighbourhood Plan should adopt a similar approach to selecting development sites.
United Nations Kyoto Protocol	<ul> <li>This protocol aims to Implement and/or further elaborate policies and measures for member states in accordance with its national circumstances, such as:</li> <li>Enhancement of energy efficiency in relevant sectors of the national economy;</li> <li>Protection and enhancement of sinks and reservoirs of greenhouse gases not controlled by the Montreal Protocol, taking into account its commitments under relevant international environmental agreements; promotion of sustainable forest management practices, afforestation and reforestation;</li> <li>Promotion of sustainable forms of agriculture in light of climate change considerations;</li> <li>Research on, and promotion, development and increased use of, new and renewable forms of energy, of carbon dioxide sequestration technologies and of advanced and innovative environmentally sound technologies;</li> <li>Progressive reduction or phasing out of market imperfections, fiscal incentives, tax and duty exemptions and subsidies in all greenhouse gas emitting sectors that run counter to the objective of the Convention and application of market instruments;</li> </ul>	The Neighbourhood Plan should attempt to create new developments that adhere to the low carbon and low emissions ethos that is within the Kyoto Protocol. Development that utilises new technologies, techniques or materials should be considered in the Neighbourhood Plan where possible and appropriate.



International Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	<ul> <li>Encouragement of appropriate reforms in relevant sectors aimed at promoting policies and measures which limit or reduce emissions of greenhouse gases not controlled by the Montreal Protocol;</li> <li>Measures to limit and/or reduce emissions of greenhouse gases not controlled by the Montreal Protocol in the transport sector;</li> <li>Limitation and/or reduction of methane emissions through recovery and use in waste management, as well as in the production, transport and distribution of energy</li> </ul>	
World Commission on Environment and Development 'Our Common Future' 1987	<ul> <li>This report aims are:</li> <li>to propose long-term environmental strategies for achieving sustainable development by the year 2000 and beyond; to recommend ways concern for the environment may be translated into greater cooperation among developing countries and between countries at different stages of economic and social development and lead to the achievement of common and mutually supportive objectives that take account of the interrelationships between people, resources, environment, and development;</li> <li>to consider ways and means by which the international community can deal more effectively with environment concerns; and</li> <li>to help define shared perceptions of long-term environmental issues and the appropriate efforts needed to deal successfully with the problems of protecting and enhancing the environment, a long term agenda for action during the coming decades, and aspirational goals for the world community.</li> </ul>	The Neighbourhood Plan would have to contribute to the co- operative effort to reduce the environmental impacts of development through policy to promote more efficient and carbon neutral techniques and materials in design and construction.
The World Summit on Sustainable Development Johannesburg Summit 2002	<ul> <li>The Summit sought to address social, environmental and economic with particular focus on the issues facing some of the most deprived people across the world. It aimed to:</li> <li>halve the proportion of the world's population that lives on less than \$1 a day;</li> <li>halve the number of people living without safe drinking water or basic sanitation; and</li> <li>reduce mortality rates for infants and children under five by two thirds, and maternal mortality by three quarters;</li> <li>Other provisions address a comprehensive range of environmental and development issues, such as</li> </ul>	Despite many of these issues and aims having limited relevance to the population in Pulborough, who have a comparatively high level of wealth and a good quality of life, issues surrounding climate change and renewable energy have significant implications for development in the Plan area. The Neighbourhood Plan should strive to ensure developments



International Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	climate change, energy, agriculture, trade, African development, and small island States. The Implementation Plan calls for a substantial increase in use of renewable sources of energy "with a sense of urgency". Although it sets no specific targets; implementation of a new global system for classification and labelling of chemicals was discussed in an attempt to restore depleted fish stocks.	of low carbon housing and reduce environmental degradation through responsible design and construction practices.
Environmental Assessment of Plans and Programmes Regulations (SEA Regulations)	These regulations transpose the requirements of the SEA Directive (2001/42/EC) into national law. The SEA Directive sets out the requirement for an environmental assessment to be undertaken when preparing certain plans and programmes and also details which types of plans and programmes are likely to be subject to SEA. The regulations also set out procedures for preparing the environmental report and consultation.	Neighbourhood Plans that have been screened as having a likely effect on the environment are subject to SEA. These regulations help inform the content of an Environmental Report. By assessing impacts of any developments on the locality and investigating alternative approaches and sites, development can meet the needs of the Plan area while also positively impacting on the economy, society and environment where possible.
The Conservation of Habitats and Species Regulations	These regulations transpose the Habitats Directive into national law, and updates and consolidates all the amendments to the Regulations since they were first made in 1994. They set out protection and registry of European sites, including SACs and SPAs classified under the Birds Directive. They also make special provisions for the protection of European marine sites and the preservation of protected species.	The Neighbourhood Plan must ensure the protection of sites of European Significance in relation to their flora and fauna, and enter into the agreement that compensatory measures will be required where damage may occur through development or the carrying out of extraction.



## A2.2 National Plans & Programmes

#### Table 40: Contextual Review of National Plans and Programmes

National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Planning Practice Guidance	This web-based resource provides guidance to support the National Planning Policy Framework and its application in practice. It is also easy to link easily between the National Planning Policy Framework and relevant planning practice guidance, as well as between different categories of guidance.	Provides guidance on the preparation of Neighbourhood Plans and accompanying SEA.
Localism Act 2011	The Localism Act provides a general power of competence for local authorities in England. It gives these authorities the same power to act that an individual generally has and provides that the power may be used in innovative ways, that is, in doing things that are unlike anything that a local authority – or any other public body – has done before, or may currently do. Where an authority can do something under the power, the starting point is that there are to be no limits as to how the power can be exercised. The power, does not need to be exercised for the benefit of any particular place or group, and can be exercised anywhere and in any way.	The Localism Act gave new powers to local authorities to support a much more localised approach to development than had previously been possible. Following this, the Neighbourhood Plan can inform and create planning policy to benefit the population of the Plan area.
National Planning Policy Framework (2019)	<ul> <li>This framework sets out the Government's planning policies for England and how these are expected to be applied. It replaces all Planning Policy Statements and Planning Policy Guidance.</li> <li>The framework seeks to contribute to the achievement of sustainable development by pursuing economic, environmental and social gains jointly and simultaneously through the planning system. It defines planning as having: <ul> <li>an economic role – contributing to building a strong, responsive and competitive economy;</li> <li>a social role – supporting strong, vibrant and healthy communities; and</li> <li>an environmental role – contributing to protecting and enhancing our natural, built and historic environment.</li> </ul> </li> <li>The framework sets out 12 core land-use planning principles that Neighbourhood Planning authorities should follow and provides guidance on preparing Local and Neighbourhood Plans and on determining planning applications.</li> </ul>	The Neighbourhood Plan must be in conformity with this national planning document in order to ensure development is approached sustainably. Therefore, the Neighbourhood Plan should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.



National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	<ul> <li>The framework also describes the role of planning in delivering sustainable development under 14 themes.</li> <li>These are: <ul> <li>Building a strong, competitive economy</li> <li>Ensuring the vitality of town centres</li> <li>Supporting a prosperous rural economy</li> <li>Promoting sustainable transport</li> <li>Supporting high quality communications infrastructure</li> <li>Delivering a wide choice of high quality homes</li> <li>Requiring good design</li> <li>Promoting healthy communities</li> <li>Protecting Green Belt land</li> <li>Meeting the challenge of climate change, flooding and coastal change</li> <li>Conserving and enhancing the natural environment</li> <li>Facilitating the sustainable use of minerals</li> </ul> </li> <li>A key part of the NPPF is the presumption in favour of sustainable development which is relevant to both plan making and decision making.</li> </ul>	
Draft revised National Planning Policy Framework, MHCLG (March, 2018)	In March 2018, a series of proposed changes to the NPPF where consulted upon. This included changes regarding Green Belt land, added importance as to the role of small sites in Neighbourhood Plans and a standardised approach to calculating housing needs at the local level. The 2019 NPPF is now in force and introduces this new content on calculating housing needs using a standardised methodology (Objectively Assessed Needs – OAN) and sets a specific figure for Pulborough Borough of 342 dwellings per annum over a ten year period.	Although the Plan has been prepared after the 'transitional period' of changes being adopted and applicable, the nature and implications of these changes are important to consider in regard to the Neighbourhood Plan and housing needs.
Building a Greener Future: Policy Statement	This document sets out the Government's intention for all new homes to be zero carbon by 2016 with a major progressive tightening of the energy efficiency building regulations - by 25 per cent in 2010 and by 44 per cent in 2013 - up to the zero carbon target in 2016. In addition, the government introduced a time-limited stamp duty land tax relief with effect from 1 October 2007 for new homes built to a zero carbon standard.	The Neighbourhood Plan should have regard to this policy statement and include measures which seek to achieve the targets set. New dwellings should strive to fulfil the aim of zero carbon housing wherever possible.
Community Infrastructure Levy An Overview	The Community Infrastructure Levy (the levy) came into force in April 2010. It allows local authorities in England and Wales to raise funds from developers undertaking new	Knowledge of the Community Infrastructure Levy is important to understand how elements of



National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. The Community Infrastructure Levy charging authorities (charging authorities) in England will be district and metropolitan district councils, London borough councils, unitary authorities, national park authorities, The Broads Authority and the Mayor of London. These bodies all prepare development plans for their areas, which are informed by assessments of the infrastructure needs for which the levy may be collected.	infrastructure will be funded. The Community Infrastructure Levy may need to be factored into costings of any allocations regarding viability considerations.
Underground, Under Threat - Groundwater protection: policy and practice (GP3)	<ul> <li>This document sets out the Environment Agency's (EA) aims and objectives for groundwater, their technical approach to its management and protection, the tools they use to do their work and the main policies and approach to the application of legislation. The main aims are: <ul> <li>To encourage co-operation between the EA and other bodies with statutory responsibilities for the protection of groundwater;</li> <li>To promote policies, so that land-users and potential developers may anticipate how the EA are likely to respond to a proposal or activity;</li> <li>To influence the decisions of other organisations on issues the EA are concerned about but which they do not regulate;</li> <li>To ensure that groundwater protection and management are consistent with EA's Vision for the environment and a sustainable future; and</li> </ul> </li> </ul>	Land use planning can have negative impacts on groundwaters. Relevant to the Neighbourhood Plan, impacts can occur from urban development and over- abstraction. Groundwaters may have to be a consideration in Neighbourhood Plan policy.
Model Procedures for the Management of Land Contamination – Contaminated Land Report 11	The Model Procedures for the Management of Land Contamination provides the technical framework for structured decision making about land contamination. They encourage the formalisation of outputs from the process in the form of written records that contain details of specific project objectives, decisions and assumptions, as well as recommendations and other specific outputs. The Model Procedures have been developed to provide the technical framework for applying a risk management process when dealing with land affected by contamination. The process involves identifying, making decisions on, and taking appropriate action to deal with land contamination in	Contaminated land can affect Neighbourhood Plan policy where it may present a risk to a range of receptors including humans, ecosystems, water quality, and property. Not understanding the risks may inhibit the development or redevelopment of land, and in some cases contribute to long- term dereliction and increase pressure to develop Greenfield land. In addition, the



National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	<ul> <li>a way that is consistent with government policies and legislation within the UK.</li> <li>The technical approach presented in the Model Procedures is designed to be applicable to a range of non-regulatory and regulatory contexts that includes: <ul> <li>Development or redevelopment of land under the planning regime</li> <li>Regulatory intervention under Part IIA of the Environment Protection Act 1990 or Part III of the Waste &amp; Contaminated Land (Northern Ireland) Order 1997</li> <li>Voluntary investigation and remediation</li> <li>Managing potential liabilities of those responsible for individual sites or a portfolio of sites</li> </ul> </li> </ul>	Neighbourhood Plan should endeavour to incorporate best practice principles provided by the Model Procedures to prevent contamination in the Plan area for the future and align with government policy and legislation.
Natural Environment and Rural Communities Act	This document relates to nature conservation, biodiversity, SSSIs and Rights of Way amongst others in regards to a duty to protect, and enforce codes of conduct in relation to these designated and non-designated elements of the environment.	The Neighbourhood Plan can influence the protection of these designations and non- designated elements of the environments through policy and appropriate site allocations.
Countryside and Rights of Way Act 2000	Further information on Rights of Way in relation to nature conservation with wildlife protection, SSSIs and biological diversity amongst other elements of the environment, including regulations to restrict the impacts of vehicles on the environment.	The Neighbourhood Plan can influence the protection of these designations and non- designated elements of the environments through policy and appropriate site allocations.
Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).	The SEA Regulations set out the mandatory requirements regarding Sustainability Appraisal for Neighbourhood Plans and also the requirements of the process.	The Neighbourhood Plan must and is undertaking SEA. These Regulations inform the SEA as to what is required to be included in formulating and presenting the Report.
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)	This Air Quality Strategy sets out air quality objectives and policy options to further improve air quality in the UK from today into the long term. As well as direct benefits to public health, these options are intended to provide important benefits to quality of life and help to protect our environment.	Air quality in the borough requires protection from the strain of further development and additional housing and vehicles producing pollutants. Considerations for air quality should be present within the Neighbourhood Plan, with reduction and mitigation

pollution production.



National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
		measures present where necessary and possible.
Safeguarding Our Soils: A Strategy for England (2009)	<ul> <li>By 2030, the strategy aims to have all of England's soils to be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations.</li> <li>agricultural soils will be better managed and threats to them will be addressed;</li> <li>soils will play a greater role in the fight against climate change and in helping us to manage its impacts;</li> <li>soils in urban areas will be valued during development, and construction practices will ensure vital soil functions can be maintained;</li> <li>pollution of our soils is prevented, and our historic legacy of contaminated land is being dealt with.</li> </ul>	Soil quality has a key role in water quality, climate change issues and the historic legacy and health of the environment. The Neighbourhood Plan should attempt to retain and protect soil quality within the borough through construction techniques. Through aligning with the strategy, development in the borough can occur responsibly without causing soil degradation.
Natural Environment White Paper: The Natural Choice: Securing the Value of Nature (2011)	<ul> <li>This document strives to safeguard the environment through the promotion of a number of aims:</li> <li>facilitating greater local action to protect and improve nature;</li> <li>creating a green economy, in which economic growth and the health of our natural resources sustain each other, and markets, business and Government better reflect the value of nature;</li> <li>strengthening the connections between people and nature to the benefit of both; and</li> <li>showing leadership in the European Union and internationally, to protect and enhance natural assets globally.</li> </ul>	The Neighbourhood Plan would benefit from incorporating the values of this document when planning and allocating new development. The protection of natural assets and the advancement of a green economy within the Plan area would assist in improving the economic, social and environmental situation in the area.
The National Adaptation Programme – Making the Country Resilient to a Changing Climate (2013)	<ul> <li>The programme seeks to address risks associated with climate change issues through objectives relating to:</li> <li>Increasing awareness</li> <li>Increasing resilience to current extremes</li> <li>Taking timely action for long-lead time measures</li> <li>Addressing major evidence gaps.</li> </ul>	At the core of the programme is the notion of pre-emptive action to avoid any severe impacts on the environment. This should be integrated into the Neighbourhood Plan as a strategy to predict and mitigate impacts of development and reduce the environmental degradation arising from construction and increased



National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Planning Policy for Traveller Sites (2012)	<ul> <li>The aims for this policy are:</li> <li>that Neighbourhood Planning authorities should make their own assessment of need for the purposes of planning</li> <li>to ensure that Neighbourhood Planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites</li> <li>to encourage Neighbourhood Planning authorities to plan for sites over a reasonable timescale</li> <li>that plan-making and decision-taking should protect Green Belt from inappropriate development</li> <li>to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites</li> <li>that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective</li> <li>for Neighbourhood Planning authorities to ensure that their Neighbourhood Planning permission, to address under provision and maintain an appropriate level of supply</li> <li>to reduce tensions between settled and traveller communities in plan-making and planning decisions</li> <li>to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure</li> <li>for Neighbourhood Planning authorities to have due regard to the protection of local amenity and local environment</li> </ul>	The Neighbourhood Plan may need to include information on the requirements of land and provision for Gypsy and Traveller communities within the Plan area if necessary.



# A2.3 Sub-National Plans & Programmes

### Table 41: Contextual Review of Sub-National Plans and Programmes

Sub-National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
West Sussex Waste Local Plan (April 2014)	<ul> <li>The Waste Local Plan outlines the need for the Neighbourhood Plan to provide and safeguard facilities that maximise opportunities for waste to be:</li> <li>reused;</li> <li>composted;</li> <li>recycled; and</li> <li>treated.</li> </ul>	The Neighbourhood Plan may need to consider waste generation; the overall population of Pulborough is projected to increase over the next 15 years. The policies within the Waste Local Plan provide guidelines for the Neighbourhood Plan to develop sustainably with minimum impact on the landscape from ineffective disposal of waste.
West Sussex Joint Minerals Local Plan (July 2018)	<ul> <li>The objectives for the Joint Minerals Plan is as follows:</li> <li>to promote the prudent and efficient production and use of minerals and to ensure a steady and adequate supply;</li> <li>to maximise and prioritise the supply and use of secondary and recycled aggregates before supply and use of primary sources;</li> <li>to provide for minerals to meet the identified need, from outside the South Downs National Park, where possible; and only allow development within the national park in exceptional circumstances and where it is in the public interest;</li> <li>to safeguard potential economically viable mineral resources from sterilisation;</li> <li>to conserve and enhance the landscape and townscape character of West Sussex and the special qualities of the South Downs National Park and the local distinctiveness and character of the High Weald AONB and Chichester Harbour AONB and the settings of all protected landscapes;</li> <li>to protect and, where possible, enhance the natural and historic environment and resources of West Sussex;</li> </ul>	The Neighbourhood Plan would benefit from incorporating the objectives set out in the Joint Minerals Local Plan, as the presence of the South Downs National Park places a constraint on development and the extraction of minerals. The Joint Minerals Local Plan sets out guidance on how to approach this only when absolutely necessary. The Plan also safeguards land within Pulborough for various mineral deposits, which need to be considerations in the Neighbourhood Plan.



Sub-National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
West Sussay Energy	<ul> <li>to minimise the risk to people and property from flooding to safeguard water resources from contamination; to ensure the quality and quantity of the water environment is conserved and enhanced;</li> <li>to maximise the use of rail and water transport for the movement of minerals and to minimise lorry movement and the use of local roads for minerals;</li> <li>to protect the environment and local communities in West Sussex from unacceptable impacts of any proposal for oil and gas development; and</li> <li>to ensure high quality mitigation and restoration to appropriate after uses.</li> </ul>	The Neighbourbood Plan would
West Sussex Energy Strategy 2016-2020	<ul> <li>The Energy Strategy establishes how West Sussex County Council can build upon the work completed to date in terms of energy provision, and address the key issues facing the authority, whilst looking for ways to support its residents.</li> <li>The Strategy also: <ul> <li>provides a framework to co-ordinate effort in delivering common aims;</li> <li>encourages buy-in and ownership for joint working with partners;</li> <li>ensures co-ordination and focus on priority areas where efforts can deliver the greatest benefits for the County.</li> </ul> </li> <li>The Strategy does not address energy issues such as the development of onshore hydrocarbons or transport energy demand.</li> </ul>	The Neighbourhood Plan would benefit from incorporating the key elements of the Energy Strategy as it outlines how best to secure energy whilst maintaining affordability. The delivery of the Neighbourhood Plan may need to consider the future energy scenarios of Pulborough and how the Parish contributes/ factors in to the overall demand and supply of energy within the County.
West Sussex Annual Report: A Quality of Life 2018/ 2019	<ul> <li>The Report provides a range of statistics and information about West Sussex and sets out the aims of the county which are as follows:</li> <li>giving children the best start in life;</li> <li>championing the West Sussex economy; and</li> <li>promoting independence in later life.</li> </ul>	The key categories set out in the Report provide guidance on the areas that the Neighbourhood Plan must cover to ensure that all aspects of Pulborough are planned for. The Report provides statistics that can be used as a comparative basis for the Neighbourhood Plan.
West Sussex Annual Sustainability Report 2018-19	The Report provides statistics on how the County is performing in terms of reducing its carbon footprint. The target is based on a baseline using data from 2011/12 and includes:	The Sustainability Report provides a track record in the reductions of carbon emissions and can be used by the Neighbourhood Plan for



Sub-National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	<ul> <li>energy used to heat, light and power the county's corporate buildings;</li> <li>the energy to power street lights and signs across the county; and</li> <li>mileage from staff business travel (including pool vehicles and staff-owned cars).</li> </ul>	comparisons in carbon emissions for the Parish.
Breathing Better: a partnership approach to improving air quality in West Sussex (May 2018)	The Plan provides information about air quality across the County and outlines some of the work taking place to reduce levels of pollution. The Plan highlights good practice in terms of air quality improvements and highlights where the County can deliver improvements through collaborative working more widely and effectively.	As air quality is set to decline throughout the UK in the next 20 years (without any interference from Government agencies – see Evidence Base), the Neighbourhood Plan should, where possible, limit the extent of carbon emissions generated from development. The Neighbourhood Plan can use the guidelines set out through the report and plan for the health and environmental impacts of development of air quality.
Plastics Action Plan – A Commitment from West Sussex County Council 2019- 2021	<ul> <li>The Plan's main aims is to:</li> <li>measure and audit the use of plastics and set targets for reduction;</li> <li>develop an assessment of the environmental impact of plastics bought and use to inform the purchase of goods and services; source alternatives to plastics, particularly single-use plastics where appropriate and available;</li> <li>where the use of plastics is currently unavoidable, recycled plastics will be used where practicable;</li> <li>aim to buy only those plastic products that can be easily reused or recycled;</li> <li>maintain housekeeping standards at our sites to present the escape of litter, including plastics;</li> <li>work with employees, residents and suppliers to encourage them to take practical steps to reduce the use of plastics;</li> <li>promote behaviours that reduce reliance on single-use plastics, particularly encouraging the use of tap</li> </ul>	The need to reduce plastic waste is recognised nationwide and the commitments set out by the Plastics Action Plan can be used as a guideline in the reduction of plastic use in Pulborough.



Sub-National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	<ul> <li>water over bottles water and the reduction of plastic packaging waste; and</li> <li>support and encourage employee and community initiatives to remove plastic waste and litter from the environment.</li> </ul>	
West Sussex Local Flood Risk Management Strategy 2013- 2018	<ul> <li>The overall aim of the Strategy is to ensure the risk from flooding and erosion is properly managed by using the full range of options in a coordinated way. This includes the following:</li> <li>manage the risk to people and their property;</li> <li>achieve environmental, social and economic benefits, consistent with the principles of sustainable development; and</li> <li>facilitate decision-making and action at the appropriate level – individual, community, or local authority, river catchment, coastal cell or national.</li> </ul>	As Pulborough has the River Arun running through the Parish, there is a need for flood risk management to be incorporated into the Neighbourhood Plan.
West Sussex LLFA Policy for the Management of Surface Water (November 2018)	This policy statement sets out how West Sussex LLFA, as a statutory consultee, will review drainage strategies and surface water management provisions associated with applications for development.	The presence of a surface water management policy enables allocated sites to mitigate against the potential of an increased risk of flooding, resultant from new development. This could be mitigated through the incorporation of the aims set out within this Policy in the Neighbourhood Plan context to ensure that Pulborough has an effective flood mitigation strategy.
West Sussex Preliminary Flood Risk Assessment (May 2011)	<ul> <li>The PFRA process is aimed at providing a high level overview of flood risk from local flood sources; that is surface water, groundwater, ordinary watercourses and canals. The key objectives are as follows:</li> <li>identify relevant partner organisations involved in future assessment of flood risk; and summarise means of future and on-going stakeholder engagement;</li> <li>describe arrangement for partnership and collaboration for on-going collection, assessment and storage of flood risk data and information;</li> <li>provide a summary of the systems used for data sharing and storing, and provision for quality</li> </ul>	Due to the presence of the River Arun in Pulborough, the Preliminary Flood Risk Assessment is beneficial in providing information on flooding in the area. This can be used by the Neighbourhood Plan to make informed decisions for development to ensure that surface water, groundwater and watercourse flooding is mitigated and planned for.



Sub-National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	<ul> <li>assurance, security and data licensing arrangements;</li> <li>summarise the methodology adopted for the PFRA with respect to data sources, availability and review procedures;</li> <li>assess historic flood events within the study area from local sources of flooding, and the consequences and impacts of these events;</li> <li>establish an evidence base of historic flood risk information, which will be built up on in the future and used to support and inform the preparation of WSCC's Local Flood Risk Strategy;</li> <li>assess the potential harmful consequences of future flood events within the study area; and</li> <li>review the provisional national assessment of Indicative Flood Risk Areas provided by the Environment Agency and provide explanation and justification for any amendments required to the flood risk areas.</li> </ul>	
West Sussex Structure Plan 2001-2016 (February 2005)	<ul> <li>The main aims of the Plan are to:</li> <li>regenerate the Coast;</li> <li>support and encourage appropriate economic growth in the rest of West Sussex, particularly in the north east of the County around Crawley/ Gatwick; and</li> <li>meet the local needs of rural communities.</li> </ul>	The Neighbourhood Plan may benefit from the integration of the aims set out in the Plan as it outlines ways in which to plan for development whilst meeting the needs of rural communities as well as urban.
West Sussex County Council Energy Strategy Action Plan 2019/20 – 2021-22	<ul> <li>The Action Plan outlines the main priorities to best utilise and produce energy within West Sussex, such as: <ul> <li>to reduce energy consumption and increase energy efficiency across the West Sussex County Council estate;</li> <li>to integrate energy generation and infrastructure into the development of West Sussex County Council estate;</li> </ul> </li> <li>to work in partnership with our communities and stakeholders to tackle fuel poverty and identify affordable energy efficiency and renewable energy opportunities; and</li> <li>to develop the commercial provision of energy- related services in West Sussex and ensure the creation and retention of jobs in this area.</li> </ul>	The Plan sets out the aims and preferred outcomes for West Sussex's energy consumption and production, which provides guidelines for tackling fuel poverty and identifying energy opportunities which may benefit the Neighbourhood Plan.



Sub-National Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Joint Materials Resource Management Strategy (JMRMS) for West Sussex 2005- 2035	The aim of the Strategy when assessing various approaches to managing waste is to develop an appropriate local waste management infrastructure which balances cost and environmental considerations while being robust enough to manage all of the County's waste.	The Neighbourhood Plan may benefit from the inclusion of policies on waste management due to the potential planned development within Pulborough.
Pollinator Action Plan – A Commitment from West Sussex County Council 2019-2022	<ul> <li>West Sussex aims to be rich with floral habitats, help support sustainable pollinator populations and making places more attractive for people to live and work in. The main aims are as follows: <ul> <li>encourage local plans, policy and guidance to represent the needs of pollinators;</li> <li>protect and enhance the amount of pollinator habitat in West Sussex to prevent extinctions and improve the status of any locally threatened species;</li> <li>improve our knowledge and understanding of pollinators in our local area;</li> <li>increase awareness of pollinators and their habitat needs across local residents, businesses and other landowners; and</li> <li>increase the contribution to pollinator conservation of land under the ownership of, or managed by, the County Council.</li> </ul> </li> </ul>	The decline in the pollinator population is nation-wide, therefore the Neighbourhood Plan may greatly benefit from the inclusion of policies that aim to enhance flower-rich habitats that are tailored to attract bees and other such pollinators. Raising awareness and providing protected pollinator- friendly habitats can be included within the Plan to make Pulborough an attractive and sustainable area.
West Sussex Minerals and Waste Development Scheme 2019- 2022	<ul> <li>The West Sussex Minerals and Waste Development</li> <li>Scheme is a statutory document that sets out how the</li> <li>County Council will prepare minerals and waste local plans</li> <li>and other policy documents over a rolling three-year</li> <li>period. It serves two purposes: <ul> <li>it provides the starting point for the local community</li> <li>to find the County Council's minerals and waste</li> <li>planning policies. It does this by identifying the</li> <li>current documents that form of the statutory</li> <li>'development plan' for that area; and</li> </ul> </li> <li>it sets out the programme for the preparation of the</li> <li>new local plans and other policy documents and tells</li> <li>people when the various stages will be carried out.</li> </ul>	The Development Scheme would benefit the Neighbourhood Plan as it provides guidance and other policy documents that would assist in the planning for waste and minerals extraction and usage within Pulborough.
Air Quality and Emissions Mitigation Guidance for Sussex (2019)	This guidance deals with the pollutants regulated under the Local Air Quality Management (LAWM) regime, including biomass boilers, and the assessment and control of dust during demolition and construction.	As development occurs in Pulborough, there may be a need for adequate air quality and emissions management policies that help mitigate against any decline in air quality.



# A2.4 District Level Plans & Programmes

#### Table 42: Contextual Review of District Level Plans and Programmes

District Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Northern West Sussex Housing Market Area – Affordable Housing Needs Model Update (October 2014)	The Housing Market Area can be spatially defined, as in the case of the Northern West Sussex HMA, through analysis of a variety of indicators and market characteristics including: house prices; household migration and search patterns; travel to work areas; and service catchments (such as schools or retail facilities).	The Neighbourhood Plan would need to incorporate the figures provided in the HMA to identify where affordable housing can be provided for and the appropriate mix and densities.
Northern West Sussex – Horsham: Strategic Housing Market Assessment Update (October 2012)	The SHMA provides information on the mix of housing required and together with Strategic Housing Land Availability Assessments (SHLAAs), is intended to inform the level of future housing provision. These assessments provide an evidence base for and are intended to inform Local Development Frameworks (LDFs) and future revisions to Regional Spatial Strategies (RSSs), as well as regional and local housing strategies.	The SHMA provides the Neighbourhood Plan housing mix figures and identified need in order for the Plan to provide appropriate housing allocations throughout Pulborough and will assist in the delivery of mix and density of homes.
Market Housing Mix – Crawley Borough Council and Horsham District Council (November 2016)	<ul> <li>The Report gives an analysis of the existing and future market housing mix. To achieve this, three issues form the principal scope of work:</li> <li>Assessment of the existing market housing mix and type through a review of the mix in both local authority area (excluding the South Downs National Park). This should be based on the existing data provided by the Northern West Sussex SHMA and updates;</li> <li>Assessment of deficiencies in the existing mux and type analysing the projected future mix and type requirements arising using current household projection data. The scope also includes relating housing mix to different levels of density and scale; and</li> <li>Recommendations for the future market housing mix and type drawing the analyses together.</li> </ul>	By using relevant national and local policy context for establishing the mix of market housing and setting out the existing market housing mix position, considering local characteristics of recent housing delivery, the Report may be of benefit to the Neighbourhood Plan.
Air Quality Annual Status Report for Horsham District Council 2019	This report provides an overview of air quality in Horsham District during 2019. It fulfils the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995) and the relevant Policy and Technical Guidance documents. The LAQM process places an obligation on local authorities to regularly review and assess air quality in their areas, and to determine	The Report would be beneficial to the Neighbourhood Plan as it provides information on areas of declining air quality throughout Horsham and provides a framework for limiting air pollution which could be



District Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	whether or not the air quality objectives are likely to be achieved.	incorporated into policies within the Plan.
Starter Homes Needs and Implications – Crawley Borough Council and Horsham District Council (November 2016)	<ul> <li>The Report's main aims are to:</li> <li>Identify the current scale and composition of households in Crawley and Horsham that may be eligible to purchase a Starter Home;</li> <li>Assess the future scale of households eligible for Starter Homes over the adopted plan periods;</li> <li>Review the potential effects of the provision of Starter Homes on meeting the full range of affordable housing needs of Crawley and Horsham.</li> </ul>	Using the information provided in the Report as a baseline, the Neighbourhood Plan would benefit from assessing the Starter Homes needs and opportunities for provision for the community.
Housing Need in Horsham District – Horsham District Council (March 2015)	The Report assesses housing need within Horsham District, describing both market and affordable housing, and is intended to address the scale of housing supply necessary to meet housing need.	The Neighbourhood Plan would benefit from using the Report's figures as baseline information to base their identified housing need from in order to deliver the appropriate number, type and density of homes.
Horsham District Urban Housing Potential 2004- 2018 (February 2005)	The Study has assisted the District Council in establishing the level of residential development likely to be achieved on previously developed land (PDL) in the period to 2018.	The Neighbourhood Plan would benefit from incorporating the stages of identifying Urban Housing Potential within Horsham as a means of identifying brownfield sites within Pulborough and providing housing preferably on those sites as opposed to greenfield. This however is subject to a number of site assessment factors, however the principle approach set out in the Report would be of benefit.
The Horsham District Sport, Open Space and Recreation Assessment: February 2014	<ul> <li>This Report provides the following:</li> <li>Reviews the provision of allotments, bowling greens, built sports facilities, village and community halls, play provision, golf facilities, multi-functional greenspaces, sports pitches, tennis and multi-courts, and youth activity areas and suggests some new provision standards;</li> <li>Suggests possible approaches the District Council could take to its greenspace strategy and puts forward recommendations for the policy for open</li> </ul>	The Assessment provides a set of guidelines as to what the Neighbourhood Plan should include with the provision of recreational amenities and services. The allocation of sites for the inclusion of sport, open space and recreational areas within new developments from the Neighbourhood Plan would benefit from this Assessment as



District Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	space and sport and recreation provision in its Local Development Framework.	a baseline for appropriate need and allocations.
Northern West Sussex Economic Appraisal/ Part 1 – Employment Land Review – Final Report (September 2009)	<ul> <li>The purpose of the Economic Appraisal is to provide the necessary evidence and understanding to progress to a Part II detailed Employment Land Review. Part I comprises of the following elements:</li> <li>Baseline Economic Analysis – trend-based assessment and benchmarking of economic performance and market demand. Identification of future trends, the development pipeline and potential opportunities for the intensification and redevelopment of existing sites;</li> <li>Key issues – identification of the strengths, weaknesses, opportunities and threats for both the sub-region and three constituent local authorities over both long and short-term horizons; and</li> <li>Scenario Forecasting – interrogation of an econometric forecast and development of scenarios to inform identification of future employment requirements at the sub-regional and local authority levels. Clarification of key issues, opportunities and risks and considering of the need for strategic employment development.</li> </ul>	The Report provides essential figures and statistics for the identification of existing and potential employment land for development. The Report would be beneficial to the Neighbourhood Plan as it covers the District of Horsham, and comparisons could be made to the provision of employment land within the Plan.
Northern West Sussex – Employment Land Review Part 2 – Final Draft Report (October 2010)	<ul> <li>The second part of the Employment Land Review addresses the following:</li> <li>Review and development of the ELR Part I work;</li> <li>Assessment of current &amp; potential employment sites within the sub-region;</li> <li>Recommendations regarding the future 'portfolio' of employment land.</li> <li>The requirements of other 'employment generating' uses such as health, education, tourism and retail uses are considered, drawing particularly on the economic forecasting and scenarios developed. The Report provides an analysis of key sectors and clusters in different parts of the sub-region and recommendations regarding economic strategy activities to support these sectors. It considers requirements for employment land to address strategic and local needs.</li> </ul>	The Neighbourhood Plan would benefit from the inclusion of the analysis of key sectors and economic forecasting within these to assess the need and potential for employment use within the Plan area.
Horsham District Council – Retail Needs Study (June 2010)	Horsham District is set to experience a high level of housing growth and this Study is required to plan for and meet future need in the District, taking on board the level of	Key findings from the Report would benefit the Neighbourhood Plan as a



District Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	growth envisaged. The Report reviewed the current status of retail activities in the District, local shopping patterns and flows of expenditure, and the potential for growth and change to accommodate need arising up to 2026.	baseline of retail needs could be established. The Study includes figures for the Neighbourhood Plan area and thus, the Plan could include the figures provided in the Report to accommodate growth in Pulborough and supplement any housing development with adequate retail services.
Market Appraisal on the Current and Potential Future Demand for Business Space in the Horsham District (February 2014)	The Report outlines the statistics for businesses in Horsham in terms of offices, industrial/warehouse provisions and the types of business that operate in the Horsham District.	The Neighbourhood Plan would benefit from the Report as key areas of business are outlined in areas throughout the District, and so concentrating on connecting to these economic centres would be beneficial in increasing expenditure flows through Horsham.
Northern West Sussex Economic Growth Assessment Main Report (April 2014)	<ul> <li>The purpose of the study was to:</li> <li>Define and consider the current position of the local economy and demand/supply considerations in respect of employment land;</li> <li>Evaluate the options available for future growth, including the testing of various scenarios; and</li> <li>Provide recommendations as to the most appropriate option(s), outlining a clearly defined approach as to how the three authorities may best achieve economic growth.</li> </ul>	The Assessment provides an evidence base to inform the emerging Local Plans for each of the three authorities within Horsham and supports the development of a partnership approach to joint working across a range of planning policy and economic development issues in line with the NPPF duty to cooperate.
Assessment of the Commercial Property Market – Focussing on Supply and Demand for Property South of the District together with an overview of Demand for the entire District (June 2016)	The Report provides a comprehensive assessment of available commercial sites and premises in the south of the District in addition to a market commentary on the demand for commercial floorspace. The objective of this assessment and commentary is to inform Horsham District Council's approach to losing existing commercial floor space and the requirement to allocate new sites.	The Report would assist the Neighbourhood Plan in assessing the supply and demand of commercial property in the Plan area and how best to plan for the accommodation of such needs.
Horsham District Hotel & Visitor Accommodation Study (July 2016)	The objective of the Horsham Hotel & Visitor Accommodation Study is to provide an assessment of the future potential for hotel and visitor accommodation development across Horsham District, with a particular	Whilst the Study is not directly related to the Neighbourhood Plan, it provides an overview of tourism accommodation need



District Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	focus on understanding the potential to secure new hotel provision in Horsham Town.	within the District that could be applied to the attraction of the Plan area as key attractive areas are identified.
Horsham Town Retail & Leisure Study 2017 (March 2017)	This study provides a robust evidence base, setting out the current health and performance of Horsham Town Centre and the projected need for additional retail and leisure floorspace together with a review of out of town shopping provision.	Although the Study is primarily relevant to Horsham Town Centre, the guidelines and aims set out within the Study are applicable for all towns with a central retail base, therefore is a useful reference for the Neighbourhood Plan.
Horsham District Landscape Character Assessment (October 2003)	<ul> <li>The key objectives of the study are to:</li> <li>Provide a description of the landscape character of Horsham District;</li> <li>Identify key characteristics and appraise the condition of each landscape character area;</li> <li>Identify key character changes/issues;</li> <li>Assess the sensitivity of each landscape character area to development/change;</li> <li>Provide local landscape management and planning guidelines for each character areas;</li> <li>Describe the settlement character and landscape setting of selected settlements, and evaluate the sensitivity of the landscape setting to development/change; and</li> <li>Recommend how the character assessment guidelines can be incorporated into development plan policies, supplementary planning guidance and land management initiatives.</li> </ul>	The report provides a review of the landscape throughout Horsham District which will be useful to the Neighbourhood Plan as key figures and diagrams could be incorporated into the Plan, providing relevant information on development and the planning for the preservation and protection of landscape character.
Acting Together on Climate Change – A Strategy for Horsham District (June 2009)	<ul> <li>The aims of the Strategy are as follows:</li> <li>To reduce greenhouse gas emissions from Council operations and services;</li> <li>To ensure that measures are taken to prepare the Council's assets and services for likely future changes to the climate;</li> <li>To raise awareness in the wider community about climate change;</li> <li>To work in partnership to reduce carbon emissions and prepare for the future changes to the climate across the District.</li> </ul>	Due to Climate Change being a global challenge, the Neighbourhood Plan would benefit greatly from the inclusion of guidance set out in the Strategy as a means of providing sustainable development.



District Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Gatwick Sub Region – Outline Water Cycle Study – Final Report (January 2011)	<ul> <li>The aims and objectives are as follows:</li> <li>Take an integrated approach to management of the water environment;</li> <li>Meet EU framework targets on water quality, determining whether environmental resources can cope with providing water and receiving wastewater to/from further development;</li> <li>Determine whether the existing water and wastewater services infrastructure have sufficient capacity to support the potential development;</li> <li>Determine whether environmental resources can cope with providing water and receiving wastewater to/from further development;</li> <li>Determine whether environmental resources can cope with providing water and receiving wastewater to/from further development;</li> <li>Ensure sustainable flood risk management over the long term is delivered through policies to protect future development from flooding; and</li> <li>Provide the evidence base for the Local Development Framework and Development Plan Documents.</li> </ul>	The assessment provides strategic level advice on water infrastructure and environmental capacity to inform the sub- regional authorities, which would be of great benefit to the Neighbourhood Plan.
Horsham District Council Detailed Assessment Report, Cowfold Air Quality: Local Air Quality Management Environment Act 1995 (March 2011)	This report presents the results of the most recent (at the time of publishing) monitoring and provides and accurate assessment of the likelihood of the air quality objectives being exceeded at 'relevant' locations in the area.	The report is not directly relevant to the Neighbourhood Plan, however the reviewing and assessment of air quality throughout Horsham District provides a framework under which the Neighbourhood Plan can comply with the air quality objectives outlined in the report.
South Downs Partnership Management Plan – Shaping the Future of Your South Downs National Park 2014- 2019 (2013)	The Plan aims to deliver sustainable development and take an ecosystem approach. Mitigating and adopting to climate change and the Plan aims to achieve this. The Plan embodies the principles of green infrastructure and provides opportunities to address and make good use of it at a landscape scale, to deliver a wide range of benefits for people.	Due to the Plan's area being in close proximity of the South Downs National Park, the Management Plan is very beneficial as it highlights the main aims for the preservation and sustainable development of the AONB. The Neighbourhood Plan could incorporate these to ensure that the National Park is accommodated and respected as the Plan area undergoes development.
Horsham District Council Strategic Flood	The objectives of the Horsham District Council SFRA are as follows:	The Flood Risk Assessment is extremely beneficial to the



District Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Risk Assessment – Final Report (June 2007)	<ul> <li>Undertake an SFRA in line with the policies and guidance presented in PPS25 for the administrative areas of HDC falling within the Rivers Adur and Arun catchments;</li> <li>Identify the extent of all PPS25 Flood Zones to provide sufficient information to allow the Sequential Test to be carried out;</li> <li>To identify flood defences including their condition and standard of protection;</li> <li>To identify significant historical flooding within the Arun and Adur catchments and to engage stakeholders in the discussion of flooding issues;</li> <li>Ensure that the Authority meets its obligations under emerging planning guidance: PPS25 as well as the Water Framework Directive and DEFRA's 'Making Space for Water';</li> <li>Recommendations of suitable mitigation measures including Sustainable Drainage Systems (SuDS);</li> <li>Provide an evidence-based report to inform the Horsham Local Development Framework and other Development Planning Documents about managing potential flood risk.</li> </ul>	Neighbourhood Plan as it sets out areas of varying Flood Risk Zones that can be used by the Plan to determine the best and most appropriate sites for development and which Flood Risk Zone (if any) they fall under.
Horsham District Landscape Capacity Assessment (April 2014)	<ul> <li>The key objectives of the study are to:</li> <li>Provide a transparent, consistent and objective assessment of the landscape capacity of the land around existing Category 1 and Category 2 settlements to accommodate housing and employment development; and</li> <li>Identify areas where new development could best be accommodated without unacceptable adverse landscape and visual impacts.</li> </ul>	The Study would be beneficial to the Neighbourhood Plan and the assessment of the suitability of the sites allocated for development within the Plan area. The levels of landscape sensitivity and capacity are generalised, however provide a good indication for the District overall.
Green Infrastructure Strategy: Horsham District Planning Framework (April 2014)	The Framework is to inform the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network, as well as seeks to contribute to the creation of sustainable communities through the provision of wide range of ecosystem services and quality of life and health benefits for both future and existing residents.	The Framework identifies how improvements to GI could be delivered through other Council plans and strategies and provides recommendations on how the strategy could be taken forward, proving a valuable document to incorporate within the Neighbourhood Plan.
Habitats Regulations Assessment of the	This report summarises the results of the Appropriate Assessment process, undertaken for those European sites	The report provides information of European sites within



District Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Horsham District Planning Framework (April 2014)	which could not be screened out in the AA stage undertaken in September 2012, and reviewed for this report. These sites include the Arun Valley SAC, SPA and Ramsar and the Mens SAC.	Horsham and is of relevance to the Neighbourhood Plan due to the presence of such areas within the Plan area.
Horsham District Council – Settlement Sustainability Review	The report seeks to ensure that development is sustainable by locating development in areas which have the greatest access to services, facilities and employment. It seeks to limit development to the settlements which have the greatest level of services and facilities.	The study determines sustainability on a wider scale, in terms of how this influences any emerging planning policies for the District, which includes the Neighbourhood Plan.
The High Weald AONB: An outstandingly beautiful Medieval landscape – Management Plan 2019- 2024	The Management Plan is a statutory document, which is required by the Countryside and Rights of Way Act 2000 for local authorities with land in an AONB to prepare an publish an up-to-date plan which 'formulates their policy for the management of the area and for the carrying out of their functions in relation to it'.	Whilst the High Weald AONB does not fall within the Plan area, it provides a useful reference point regarding green infrastructure.
Horsham District Council Local Development Scheme 2018- 2020	<ul> <li>The LDS has three main purposes which are as follows:</li> <li>To inform the public and stakeholders of the documents that will make up the local plan (Horsham District Council), the geographical area they will cover, and the timescale for producing each one and how they relate to each other;</li> <li>To establish and reflect the Council's priorities and to enable work programmes to be set for the preparation of the documents; and</li> <li>To set a timetable for review of the documents.</li> </ul>	The LDS can be used to find out when the Council will be preparing planning policies.
Horsham District Council Statement of Community Involvement (February 2017)	The SCI is a statutory document which sets out the ways in which the council will engage with residents, communities, businesses, local organisations and other groups to ensure as many people as possible are able to have a say in planning decisions that affect them.	The document provides guidance on how the planning system works and advises in the manner in which the Council will inform, consult and involve people in planning decisions within the Horsham District.



## A2.5 Local Level Plans & Programmes

#### Table 43: Contextual Review of Local Level Plans and Programmes

Local Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Pulborough Parish Employment Land Report (March 2018)	The Report provides details on each site that have been put forward for Employment Land Assessment by the Parish.	Some of the employment sites identified within this Report are located within the Neighbourhood Plan area and this Report provides a good reference for their overall sustainability.
Pulborough Parish SHELAA Housing Land Report (December 2018)	The Report provides details on each site that have been put forward for a Site Assessment for residential development throughout the Parish.	The SHELAA outlines which sites are deliverable / developable, achievable and indicatively suitable. This provides a good reference point for similar exercise at the Neighbourhood Plan level, and also can be used within the SEA in identifying alternatives
Pulborough Village Transport Plan (February 2010)	The Plan identifies the main transport issues facing the village not only presently but into the future. The aim of the Plan is to encourage and promote sustainable modes of transport across the village, with the emphasis on walking, cycling and public transport rather than the private car.	The Plan outlines ways in which the Neighbourhood Plan area can prioritise sustainable modes of transport, with improvements of roads inviting this development. The Plan outlines key roads and traffic counts to determine where road improvements are most needed, which would benefit the Neighbourhood Plan in terms of transport and connectivity.
Pulborough Community Action Plan 2012- 2015	<ul> <li>The Plan is a statement of which issues are most important to the people who live and work in the parish, and a strategy for working together to address them. The Plan aims to focus on:</li> <li>The local economy: supporting local traders but also recognising and supporting the ever growing number of home-based businesses;</li> <li>And active community: promoting civic pride, volunteering and an awareness that people who live and work in Pulborough can work together to</li> </ul>	The Action Plan would benefit the Neighbourhood Plan in terms of providing key aspects of development on which to focus on, as the Action Plan outlines ways in which the Parish residents feel how best to develop Pulborough.



Local Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
	<ul> <li>address local issues and exploit opportunities for a better quality of life; and</li> <li>Leisure and heritage: Pulborough has assets that need protection.</li> </ul>	
Pulborough Design Statement Supplementary Planning Document (May 2013)	<ul> <li>The Design Statement has been designed for ease of use to maximise its role in the Local Development Framework and is divided into three main sections:</li> <li>History: to aid the reader in understanding how the village has developed;</li> <li>Character Areas: to aid the reader in understanding how the village is now; and</li> <li>Guidelines: to aid the reader in the future development of the village and how the guidelines should be applied to each of the character areas.</li> </ul>	The Design Statement is beneficial to the Neighbourhood Plan as it clearly sets out a framework on how to best deliver development throughout the Parish based on an understanding of how the village came to be and exists as it is today.
Rural Community Profile for Pulborough – Action with Communities in Rural England (ACRE) Rural evidence project (November 2013)	The Rural Community Profile divides statistics about Pulborough into key sections, such as economy, equality, health & wellbeing, and provides a detailed and succinct overview of Pulborough and its residents.	The Community Profile provides essential information and data on Pulborough and its residents which would be of high benefit to the Neighbourhood Plan, as informed decisions can be made about how best to provide development for the Plan area.
Housing Needs Survey Report, Pulborough Horsham District – Action in Rural Sussex (May 2011)	The aim of this Report if to determine the existing and future housing needs of residents in Pulborough particularly those on low or modest incomes. This Report identifies the affordable housing that is required by local people in Pulborough and reports on the views of residents regarding an affordable housing development within the parish.	The housing needs highlighted throughout the Report would be beneficial to the Neighbourhood Plan as it provides key statistics on housing type, density and mix that would be best for development in Pulborough.
Pulborough Parish Neighbourhood Plan 2015- 2031 – Draft Sustainability Appraisal/ Strategic Environmental Assessment (June 2015)	The purpose of this Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Pre Submission Neighbourhood Development Plan for Pulborough Parish.	The Report would be beneficial to the Neighbourhood Plan as it ensures the social and economic objectives of a plan are achieved in addition to environmental considerations.
Pulborough Neighbourhood Plan – Stage 1 Report Part A (November 2014)	Provides an overview of the policy planning context for the designated Neighbourhood Plan area together with a brief summary of the priority issues identified through the community engagement and consultation process.	The Report provides a baseline analysis of sustainability themes within the Plan area.



Local Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Pulborough Neighbourhood Plan – Stage 1 Report Part B: Community Evidence (November 2014)	Outlines the community engagement and evidence gathering activity which has been undertaken to date. This provides a statistical summary of the Plan area, sets out the information gathered by the Neighbourhood Plan Steering Group and any sub-groups and provides details on any consultations.	This Report can be used as the basis for the Neighbourhood Plan, as the Report provides statistics on the Parish that would be of great benefit to the Plan.
Pulborough Parish Neighbourhood Plan 2015- 2031 – Submission Plan (October 2015)	The Plan has been produced by to establish a vision and strategy for the sustainable development of the parish over the next fifteen years. It sets out the planning policies that will be used to help determine planning applications in the area, alongside other relevant policies of the development plan.	This Submission Plan follows the Regulations 14 period of statutory consultation on the Pre Submission version of the Plan and the Parish Council's consideration of the representations that were made on its proposals
Pulborough Neighbourhood Plan Survey (2014)	This Survey provides detailed data regarding the status of Pulborough residents as well as those elements of planning that they would like to see addressed within the Plan.	Important for the SEA as a source of information to formulate SEA Objectives and assess / analyse elements of the plan content from a qualitative viewpoint.
Nutbourne Village Design Statement (2006)	<ul> <li>This Village Design Statement includes aspirations regarding new development in regard to:</li> <li>Scale (the scale of any new building or extension must be</li> <li>considered carefully so that it 'blends in' with the existing houses)</li> <li>Balance (any new building proposal should demonstrate that it is in balance and harmony with the existing village, as well as being 'appropriate for the plot size')</li> <li>Separation gap (the preservation of the existing separation between Nutbourne and its neighbours)</li> <li>The Conservation Area (any new development adjacent to, or visually related to, the conservation area shall be designed so as not to conflict with the aesthetic qualities of that are).</li> <li>Parking (adequate off-street parking shall be provided)</li> </ul>	Important for the SEA as a source of information to formulate SEA Objectives and assess / analyse elements of the plan content.
Pulborough Neighbourhood Plan Site Assessment -	The Site Assessment document builds on that developed by the Steering Group and adds further detail to the	Important for the SEA as a tool to assist the assessment and

Pulborough Parish Council Neighbourhood Plan Strategic Environmental Assessment: Environmental Report



Local Level Plans & Programmes	Purpose / Min Aims & Objectives	Relevance to Neighbourhood Plan / SEA
Pulborough Parish Council 20th February (AECOM, 2019)	submitted sites in and around Pulborough that have been considered for allocation within the Plan.	analysis of the Plan's site allocation options.



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