

# **Pulborough Parish Neighbourhood Plan 2015-2031**

## **Sustainability Appraisal/ Strategic Environmental Assessment**



**Published by Pulborough Parish Council for examination under the Neighbourhood Planning (General) Regulations 2012 and in accordance with EU Directive 2001/42 and the Environmental Assessment of Plans & Programmes Regulations 2004**

**October 2015**

## **NON TECHNICAL SUMMARY**

1. The purpose of this Sustainability Appraisal report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Neighbourhood Development Plan for Pulborough Parish.

2. This Sustainability Appraisal report is a systematic process used to ensure the social and economic objectives of a plan are achieved in addition to environmental considerations. For completeness, the Neighbourhood Plan has been subject to a combined process whereby a Strategic Environmental Assessment (SEA) has been incorporated within a Sustainability Appraisal (SA/SEA) to consider the wider social and economic effects.

3. The Neighbourhood Plan contains a number of policies for the use and development of land in the Parish of Pulborough in the plan period to 2031. These policies, together with the policies of the development plan - that is the policies of the 2007 Horsham Local Plan to be replaced shortly by the Horsham District Planning Framework (HDPF) - and the National Planning Policy Framework (NPPF), will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the HDPF.

4. The over-riding sustainability issue in the Parish to which the Neighbourhood Plan responds is managing the effect of the recent and future scale of housing development on the infrastructure of Pulborough village. The HDPF requires the PPNP to adopt a positive stance to planning for housing development but this must be done in ways that do not exacerbate capacity problems in the local infrastructure nor cause any significant detrimental effects on the environment of the parish.

5. As a result of the rapid growth of Codmore Hill in the last decade, the spatial structure of the main village and its new 'satellite' has changed significantly with considerable consequences. The local community is especially concerned about the availability of primary school places to meet the growing demands of the local population and the difficulties that families occupying new housing in Codmore Hill have in getting children to the village school in the main village. It is also concerned about the effects of recent supermarket developments along the A29 detracting from the Lower Street village centre offer, and again generating car trips from the main village that the local roads struggle to handle. In addition, the community remains concerned about the effects of heavy traffic using the A283 to avoid problems on the A27 to the south that accumulate with the north-south traffic using the A29 and the higher number of trips of local traffic accessing services as described above.

6. Without the Neighbourhood Plan, proposals for housing development in the parish would be left to individual planning applications and opportunities to manage change positively and cumulatively may be lost. This would make little difference to controlling the environmental impact of those proposals as they must in any event demonstrate they confirm to development plan and National Planning Policy Framework (NPPF) policy. Rather, the Plan emphasis is on delivering a series of proposals that have positive social and economic outcomes within the environmental limits imposed by the Core Strategy and by the environmental designations.

7. The National Park forms part of the southern and western areas of the parish. Part of the parish is also located within the 15km zone of influence of a site of European importance, the Arun Valley SAC/SPA/Ramsar site. Given the scale of development supported by the Neighbourhood Plan, Natural England has stated that a Habitats Regulations Assessment is likely to be required. There are 6 local nature reserves and two Sites of Special Scientific Interest (SSSI). The Parish contains two Grade I, four Grade II\* and a large number of Grade II listed buildings and structures. There are two conservation areas in Pulborough village, Church Place and Lower Street and one in the settlement of Nutbourne. There are 6 scheduled monuments in Pulborough and 6 Scheduled Buildings and Structures.

8. There are two main existing social, economic or environmental problems that affect the neighbourhood area to which the Neighbourhood Plan is intending to respond. Firstly, it seeks to promote local employment to counter the higher levels of commuting from the large scale housing developments of the last decade. Secondly, it seeks to provide for a pattern of development that does not aggravate congestion on the local roads as a result of car trips to local services, especially school journeys. In all other respects, the Neighbourhood Plan refines the management of development proposals alongside other development plan policies.

9. The Neighbourhood Plan has been prepared alongside the emerging HDPF, which contains all the appropriate strategic policies to address social, economic and environmental issues across the district, including the Neighbourhood Plan area. The Neighbourhood Plan must be in general conformity with those policies and it does not therefore seek to repeat them. To assess the sustainability performance of the Neighbourhood Plan, the proposed framework was derived from the relevant objectives of the HDPF to ease data reporting and comparison if appropriate and there appeared to be no value in 'reinventing the wheel'.

10. The six objectives have been chosen to provide a relevant framework within which to distinguish policy attributes and to compare them with any reasonable alternative policy approaches. They reflect the environmental characteristics of the parish and the intended focus of the Neighbourhood Plan. The absence of an objective does not necessarily mean that it is of not value but that its inclusion would not have helped the assessment of the Plan's objectives and policies.

11. There are four strategic objectives of the Neighbourhood Plan. They cover a range of economic, social and environmental issues in support of realising the community's vision for the parish. There is, not surprisingly, a strong correlation between the Plan objectives and those of the SA/SEA. Its environmental goals will ensure that the Plan takes full account of the special biodiversity, landscape and heritage assets and features within the parish and especially in close proximity to Pulborough village. The community objective matches well with the desire to see improvements in existing community facilities.

12. In overall terms, the sustainability effects of the Neighbourhood Plan are generally assessed as neutral but are occasionally positive. The proposed mitigation measures of most policies will effectively avoid any negative impacts. Only in respect of the reasonable alternatives are there any negative potential impacts. Further, the scale and location of specific development policies is such that there should be no

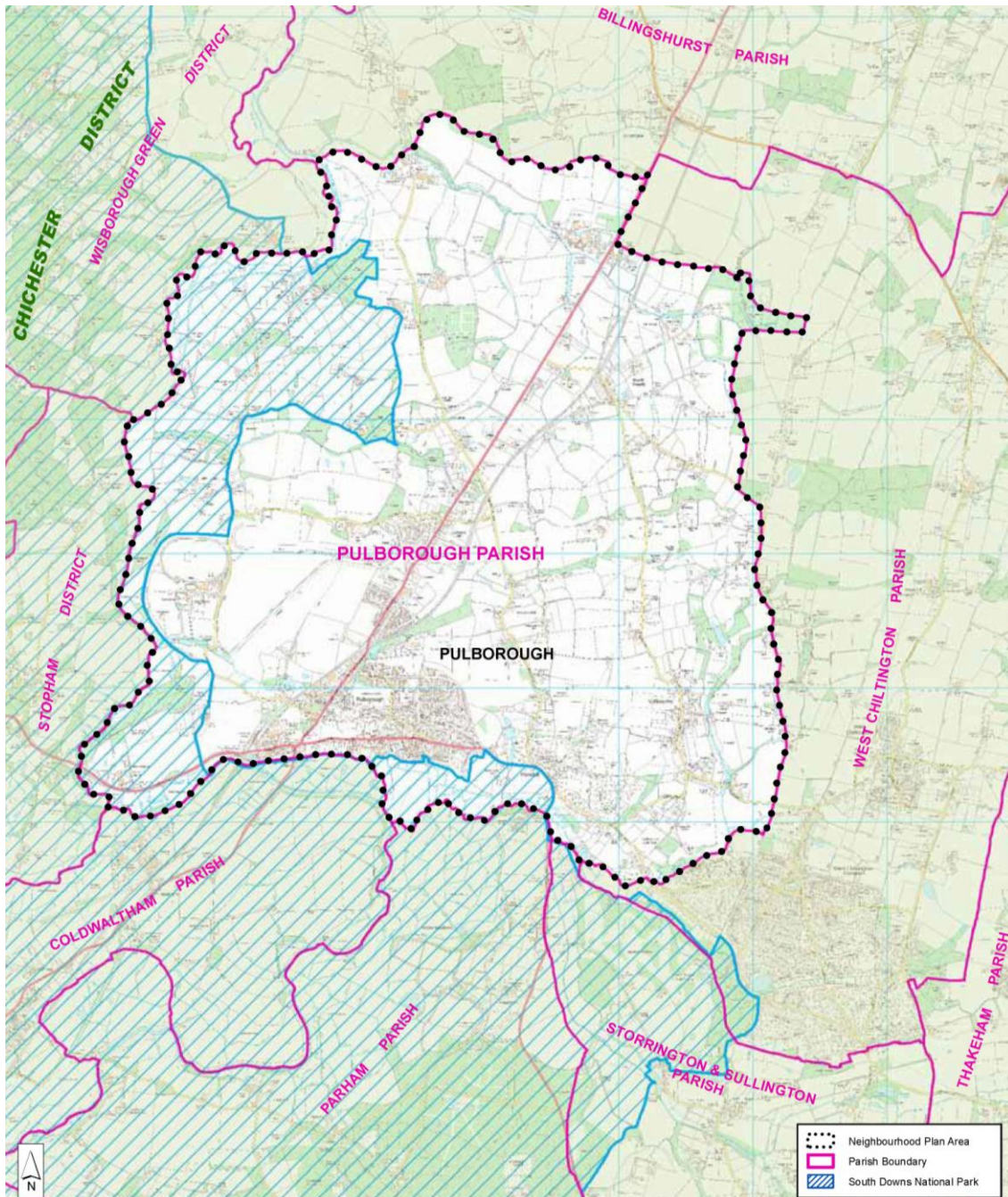
cumulative effects on the objectives and nor with the effects of policies contained within the adjoining neighbourhood plans.

13. The Parish Council will monitor the progress in the implementation of the Neighbourhood Plan using the measures identified in Table A. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data on an annual basis to report on the progress of the plan. It is likely the Parish Council will choose to review the Neighbourhood Plan on a five yearly cycle and it will be informed by this monitoring activity in considering if and how to update the policies.



## 1. Introduction

1.1 The purpose of this Sustainability Appraisal report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission Neighbourhood Development Plan for Pulborough Parish ("the Neighbourhood Plan") in accordance with the Neighbourhood Planning (General) Regulations and the EU Directive 2001/42 on strategic environmental assessment (SEA). Plan A below shows the designated Neighbourhood Area.



Plan A: The Designated Pulborough Parish Neighbourhood Area

1.2 The Neighbourhood Plan has been published for submission by Pulborough Parish Council ("the Parish Council") to the local planning authority, Horsham District Council ("the District Council"), under the Neighbourhood Planning Regulations 2012. The District Council has issued a screening opinion requiring an SEA and the Parish Council has chosen to meet this obligation by preparing a Sustainability Appraisal (SA) under the Environmental Assessment of Plans & Programmes Regulations 2004.

1.3 A Sustainability Appraisal is a systematic process used to ensure the social and economic objectives of a plan are achieved in addition to environmental considerations. For completeness, the Neighbourhood Plan has been subject to a combined process whereby the SEA has been incorporated within a Sustainability Appraisal (SA/SEA) to consider the wider social and economic effects.

1.4 A Scoping Report (as part of Stage A of the process – see Figure B below) was consulted on from 1 April to 6 May 2015 in line with the Regulations. The comments received on the proposed scope of sustainability objectives were supportive – the objectives are set out in Section 7 of this report.

1.5 The Parish Council consulted on a Pre Submission version of the plan from 19 June 2015 to 3 August 2015 for the statutory six week period. The Pre Sub Plan was informed by the SA/SEA objectives of the Scoping Report (as Stage B of the process). The Pre Sub was accompanied by the draft SA/SEA report (as Stages C and D of the process), the comments during which both led to minor modifications of the Plan and of this final version of the SA/SEA report. The ongoing monitoring of the effects of implementing the plan (Stage E of the process) are covered in section 8 of this report).

1.6 The report provides an assessment of the Neighbourhood Plan objectives and policies and seeks to do it in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The social, economic and environmental baseline data is contained in the Pulborough Neighbourhood Plan 2014-2031: First Report part A and B, which are available in the evidence base.

## **2. Background to Sustainability Appraisal & Strategic Environmental Assessment**

2.1 Through the SA/SEA the social, environmental and economic effects of the Neighbourhood Plan are tested to ensure that these promote sustainable development or at the very least that they avoid any significant environmental effects.

2.2 The combined process involves a simple evaluation of the social, economic and environmental impacts of a plan as follows:

- An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- The social, economic and environmental characteristics of areas likely to be significantly affected
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
- 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

- The likely significant effects on the local economy, society and the environment
- The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects of implementing the plan
- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
- A description of measures envisaged concerning monitoring

2.3 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan in a relatively small Parish area. The SA/SEA report of the Horsham District Planning Framework includes the following summary of the process:



**Table 1: The Combined SA/SEA process**

|                   |   |
|-------------------|---|
| <b>Scoping</b>    | <p>Stage A: This stage sets the context of the assessment by identifying the baseline data and establishing the scope of the assessment.</p> <ol style="list-style-type: none"> <li><b>1. Identification of relevant plans, policies and programmes.</b> Any existing requirements that need to be taken into account or incorporated into the plan are identified.</li> <li><b>2. Review of baseline information.</b> Data about environmental, social and economic issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation.</li> <li><b>3. Identification of Sustainability Issues</b> – the review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan;</li> <li><b>4. Development of the SA Framework:</b> The Assessment criteria used to assess the impact of the plan or programme.</li> <li><b>5. Identification of initial Plan Options:</b> Taking into account best practice, initial identification of options and reasonable alternatives is undertaken.</li> <li><b>6. Consultation</b> on the scope and alternatives for assessment - it is necessary to consult Statutory Consultees; Natural England, English Nature and the Environment Agency at this stage.</li> </ol>  |
| <b>Assessment</b> | <p>Stage B: This stage involves the assessment of any likely significant effects of plan options and alternatives on the key sustainability issues identified.</p> <ol style="list-style-type: none"> <li><b>1. Finalisation of Plan options and alternatives for testing</b></li> <li><b>2. Testing the Plan objectives against the SA Framework;</b> The plan Objectives are tested to ensure compliance with sustainability principles.</li> <li><b>3. Evaluation of plan options and alternatives;</b> The SA Framework is used to assess various plan options by identifying the potential sustainability effects which may arise from the plan.</li> <li><b>4. Predicting and evaluating the effects of the plan;</b> To predict the significant effects of the plan and assist in the refinement of the policies</li> <li><b>5. Consideration of ways to mitigate adverse effects and maximise beneficial effects;</b> To ensure that all potential mitigation measures and measures for maximising beneficial effects are identified.</li> <li><b>6. Proposing measures to monitor the significant effects of implementing the DPD;</b> To detail the means by which the sustainability performance of the plan can be assessed and monitored.</li> </ol> <p>This assessment is used to feed into the development of a plan or programme to help ensure the most sustainable option is selected. The SA Framework is also used to assess the sustainability implications of the draft policies and the results are used to inform policy development.</p> |



|                                |   |
|--------------------------------|---|
| <b>Reporting</b>               | <p><b>Stage C: Preparation of the SA Report</b></p> <ul style="list-style-type: none"> <li>The findings of the assessment together with how it has influenced the development of the plan are identified and set out in a draft environmental report together with the recommendations on how to prevent, reduce, or offset any significant negative impacts arising from the Plan.</li> </ul> <p><b>Stage D: Consultation: Seek representations from consultation bodies and the general public.</b></p> <ul style="list-style-type: none"> <li>This is an ongoing process. Consultation on the draft SA Report is undertaken alongside the publication of the any draft planning documents. The results are taken into account and used to influence further iterations of the sustainability appraisal process.</li> </ul> |
| <b>Adoption and Monitoring</b> | <p><b>Stage E: Monitoring</b></p> <p>Following Examination, an assessment of any significant changes made to the plan is undertaken and the findings are reported in an SEA Post Adoption Statement.</p> <p>Following adoption of the Plan, the significant effects of implementing the plan are measured and any adverse effects are responded to. The results are fed into future plans and sustainability appraisals.</p>  |

Figure B: SA/SEA Process

2.4 Since the Scoping Stage A was completed, the focus has been on spatial strategy choice and policy formulation. As discussed in Section 7, there have been two alternative spatial strategies to assess using the SA/SEA framework, amongst other factors, and the framework has been used to compare the other policies with a 'policy off' alternative.

### **3. An outline of the contents, main objectives of the Neighbourhood Plan and relationship with other relevant plans or programmes**

3.1 The Neighbourhood Plan contains a number of policies for the use and development of land in the Parish of Pulborough in the plan period to 2031. These policies, together with the policies of the development plan - that is the policies of the 2007 Horsham Local Plan to be replaced shortly by the Horsham District Planning Framework (HDPF) - and the National Planning Policy Framework (NPPF), will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the HDPF.

### 3.2 The vision of the parish in 2031 is:

*"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."*

### 3.3 The Neighbourhood Plan translates this vision into a series of strategic objectives and identifies key measures for each objective, as follows:

#### Environment

- To conserve the landscape, scenic beauty and views of the South Downs National Park and other surrounding countryside
- 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 (attached as appendix 1)

#### Community

- 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
- To create the feeling of a unified community
- To increase the capacity of local primary 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

#### New Homes

- To reuse brownfield sites and where possible to renovate disused agricultural buildings.
- 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.
- 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.

#### Employment

- To encourage economic development at existing economic areas

- To encourage retail development along Lower Street as the community's preferred retail heart whilst also supporting the other established commercial areas
- To encourage a diversity of business and the creation of a stronger visitor economy
- 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

3.4 The Core Strategy (and the HDPF) provides a clear policy framework for securing sustainable development and the Neighbourhood Plan will be in general conformity with the provisions of that framework. It defines Pulborough village as a 'Category 1 Settlement' (which the HDPF defines as a 'Larger Village') and Codmore Hill as a 'Category 2 Settlement' (but defined as part of Pulborough village in the HDPF) in its settlement hierarchy. It also establishes clear policies for the protection of the countryside and heritage character of the District.

3.5 The Core Strategy contains a range of strategic policies, although it could not have anticipated the advent of neighbourhood planning. Of most relevance to the Plan are the following policies:

- Policy CP1: Landscape & Townscape Character – protecting, conserving and enhancing landscape and townscape character and biodiversity
- Policy CP3: Improving the Quality of New Development – expecting proposals to meet high design standards and to be informed by adopted design statements
- Policy CP5: Built Up Areas & Previously Developed Land – identifying Pulborough as a Category 1 Settlement and Codmore Hill as a Category 2 Settlement, defining Built-Up Area Boundaries around each settlement on the Proposals Map and requiring development to meet local housing needs
- Policy CP8: Small Scale Greenfield Sites – allowing for small scale extensions to the smaller villages to meet local housing needs
- Policy CP9: Managing the Release of Housing Land – managing the release of land for housing for delivery over the whole plan period
- Policy CP11: Employment Sites & Premises – encouraging the use of existing site and protecting them from unnecessary loss (the Proposals Map identifies the Station Industrial Estate as an Employment Protection Zone)
- Policy CP12: Meeting Housing Needs – setting affordable housing provision on sites of 15 dwellings or more at 40%
- Policy CP14: Protection & Enhancement of Community Facilities & Services – encouraging proposals for new facilities and protecting existing facilities including open spaces
- Policy CP15: Rural Strategy – encouraging rural economic development in defined settlements
- Policy CP17: Vitality & Viability of Existing Centres – defining retail frontages in Pulborough (Lower Street) to encourage new retail development and to protect existing units from unnecessary loss

3.6 However, as the HDPF is expected to be adopted in the near future, the Neighbourhood Plan must anticipate its strategic policy framework. Importantly, the Inspector's Report of his examination of the HDPF has found its spatial strategy sound. This strategy identified a clear role for neighbourhood planning in the district in

contributing to meeting local housing need. Whilst the total number of new homes needed in the district to 2031 has had to increase, their spatial distribution has not changed.

3.7 In which case, it is helpful to summarise the key strategic content of the HDPF. The plan acknowledges the important, complementary role of neighbourhood plans in forming the development plan for the District. It states that “many local needs and objectives will be identified and met through neighbourhood plans and this will include the identification of locally specific issues and requirements (including) the allocation of sites ...” (para 2.11, p7).

3.8 The HDPF identifies a series of strategic policies that set the policy framework for all the neighbourhood plans in the District:

- Policy 2 Strategic Development – establishing the key principles for all development in the district, including how development around the edges of existing rural settlements should be managed
- Policy 3 Development Hierarchy – defining the position of all settlements in the District into a hierarchy based on their population and services; Pulborough (with Codmore Hill) is identified as a ‘Larger Village’
- Policy 4 Settlement Expansion – providing for the growth of settlements to meeting identified local housing, employment and community needs
- Policy 8 Employment Development – protecting existing employment sites and encouraging their appropriate expansion
- Policy 9 Rural Economic Development – encouraging development to promote local employment opportunities
- Policy 11 Vitality & Viability of Existing Retail Centres – defining Pulborough as a ‘Secondary Centre’ in the district retail hierarchy
- Policy 12 Town Centre Uses - managing the mix of village centre uses
- Policy 14 Housing Provision – requiring neighbourhood plans to make provision in total for 1,500 new homes in the plan period, reflecting the position of settlements in the hierarchy of Policy
- Policy 23 Environmental Protection – minimising the impact of emissions of pollutants, including air pollution
- Policy 24 Natural Environment and District Character – protecting the landscape, landform and development pattern of the District
- Policy 25 Countryside Protection – protecting the rural character of the countryside beyond defined settlement boundaries
- Policy 26 Settlement Coalescence – preventing development that will lead to the coalescence of settlements
- Policy 29 Protected Landscapes – identifying the setting of the South Downs National Park
- Policy 31 Quality of Development – ensuring development schemes understand and respond to their context
- Policy 33 Cultural & Heritage Assets – managing development affecting heritage assets like Conservation Areas and Listed Buildings
- Policy 38 Infrastructure Provision – ensuring that development schemes can be accommodated by the local infrastructure and contribute to improvements where necessary to ensure the proper planning of the area



3.9 The SA/SEA of the HDPF confirmed that its policies and proposed modifications prior to and following the Inspector's Initial Findings would result in no significant environmental effects that could not be satisfactorily mitigated. In due course, these policies will therefore provide the framework within which the Neighbourhood Plan policies will be implemented.

3.10 The Neighbourhood Plan also contains a number of policy proposals within the South Downs National Park Authority area, in which case, the reasoning and evidence of the Authority's first Local Plan, which is currently at an early stage, has been taken into account. The Pulborough and Nutbourne Design Statements have also been referred to in informing its policies.

3.11 A Neighbourhood Plan is being prepared for the adjoining parish of West Chiltington, in accordance with strategic policy frameworks of the Core Strategy and the HDPF. The West Chiltington Neighbourhood Plan has yet to be published for consultation.

#### **4. The relevant aspects of the current state of local social, environmental and economic issues and the likely evolution thereof without implementation of the Neighbourhood Plan**

4.1 The over-riding sustainability issue in the Parish to which the Neighbourhood Plan responds is managing the effect of the recent and future scale of housing development on the infrastructure of Pulborough village. The HDPF requires the Neighbourhood Plan to adopt a positive stance to planning for housing development but this must be done in ways that do not exacerbate capacity problems in the local infrastructure nor cause any significant detrimental effects on the environment of the parish.

4.2 As a result of the rapid growth of Codmore Hill in the last decade, the spatial structure of the main village and its new 'satellite' has changed significantly with considerable consequences. The local community is especially concerned about the availability of primary school places to meet the growing demands of the local population and the difficulties that families occupying new housing in Codmore Hill have in getting children to the village school in the main village. It is also concerned about the effects of recent supermarket developments along the A29 detracting from the Lower Street village centre offer, and again generating car trips from the main village that the local roads struggle to handle.

4.3 In addition, the community remains concerned about the effects of heavy traffic using the A283 to avoid problems on the A27 to the south that accumulate with the north-south traffic using the A29 and the higher number of trips of local traffic accessing services as described above.

4.4 There is also a strong desire of the local community to encourage more employment to the village to reduce its dependency on commuting to jobs in surrounding towns. The number of jobs in the village has not kept pace with its rapid housing growth of the last decade, resulting in greater congestion on the local roads. The station is regarded as playing an important role in both encouraging new employment and in persuading the local workforce to switch to that mode of transport.

4.5 Without the Neighbourhood Plan, proposals for housing development in the parish would be left to individual planning applications and opportunities to manage change positively and cumulatively may be lost. This would make little difference to controlling the environmental impact of those proposals as they must in any event demonstrate they confirm to development plan and National Planning Policy Framework (NPPF) policy. Rather, the Plan emphasis is on delivering a series of proposals that have positive social and economic outcomes within the environmental limits imposed by the Core Strategy and by the environmental designations.

## **5. The environmental characteristics of areas likely to be significantly affected**

5.1 The National Park forms part of the southern and western areas of the parish. Part of the parish is also located within the 15km zone of influence of a site of European importance, the Arun Valley SAC/SPA/Ramsar site. Given the scale of development supported by the Neighbourhood Plan, Natural England required that a Habitats Regulations Assessment should be screened for (see later).

5.2 There are 6 local nature reserves and two Sites of Special Scientific Interest (SSSI). There are some Priority Habitat areas that have been identified by Natural England. There are Ancient & Semi-Natural Woodland and some Traditional Orchard Priority Habitats. Lots of areas of Deciduous Woodland Habitat spread in pockets across the Parish.

5.3 The parish lies within landscape character areas F1 of 'Pulborough, Chiltington and Thakeham Farmlands,' and O1 'Amberley and Pulborough Brooks' and as such they have been assessed as having overall moderate/high sensitivity to change due to the decline in traditional land management, large scale housing and commercial /industrial development, minor road improvements and visibility on the valley sides.

5.4 The Parish contains two Grade I, four Grade II\* and a large number of Grade II listed buildings and structures. There are two conservation areas in Pulborough village, Church Place and Lower Street and one in the settlement of Nutbourne. There are 6 scheduled monuments in Pulborough and 6 Scheduled Buildings and Structures.

5.5 The Neighbourhood Plan policies and proposals are almost entirely confined to the Pulborough village. In addition, although the local community may regard the scale of development proposals of the Plan as considerable, they are not in relation to the existing building stock of the parish, to the scale of housing development over the last decade or so, or to the strategic development provisions elsewhere in the district provided for by the HDPF.

5.6 It is therefore difficult to assess either the individual or cumulative effects of the Plan policies. Rather, the policies should avoid any obvious environmental harm in terms of the proximity of development proposals to the natural or heritage assets referred to above. Thereafter, the expectation is that planning applications in future will be screened for the need for Environmental Impact Assessment and other assessments (e.g. heritage) and they will be determined using the development management policies of the Plan and of other development plan documents. Should any proposals of the Plan not be consented in due course, as they cannot overcome over-riding environmental problems, then future reviews of the Plan will consider replacing them with new proposals. As the Plan does not have specific policy targets to reach, notably

in housing development, then there will be urgency in identifying such replacement policies.

## **6. Any existing social, economic or environmental problems that are relevant to the Neighbourhood Plan**

6.1 The problems are described in Section 4 above. The ability of the Plan to address these problems is limited as many are the result of land use and other policy decisions taken by other bodies at high levels than the Parish Council. The Plan can only seek to ensure that those problems are not made worse in respect of the limited land use planning matters that are within the scope of neighbourhood plans.

6.2 This is difficult for the local community to understand and accept, especially as the Plan has to remain positive about development to be consistent with the NPPF. In other cases, the solutions lie beyond the ability of the land use planning system to rectify – for example in changing retail trends – or the considerable extension of permitted development rights of recent years has removed the opportunity for the development plan to intervene.

6.3 However, as noted in section 4, there is an expectation that the Neighbourhood Plan will address the problems of infrastructure and employment in the village. The number of jobs created in the parish in recent years has fallen well below the number of new homes, resulting in a significant increase in commuting by car. The scale and location of new housing, primarily along the A29, has also increased pressure on local public services and utilities infrastructure.

## **7. The social, environmental and economic objectives that are relevant to the Neighbourhood Plan and the way those objectives and any considerations of its sustainability have been taken into account during its preparation**

7.1 The Neighbourhood Plan has been prepared alongside the emerging HDPF, which contains all the appropriate strategic policies to address social, economic and environmental issues across the district, including the Neighbourhood Plan area. The Neighbourhood Plan must be in general conformity with those policies and it does not therefore seek to repeat them.

7.2 To assess the sustainability performance of the Neighbourhood Plan, the following assessment framework has been adopted. The proposed framework was consulted upon with the statutory consultees as part of the SA/SEA Scoping Report and it has been modified to take into account their comments. It is deliberately drawn from the SA/SEA Objectives of the HDPF so that, where possible and relevant, data sets can be shared for monitoring purposes (see Section 8).

7.3 In the consultation on the SA/SEA Scoping Report, the statutory bodies made a series of suggestions for how the objectives and measures may be improved. However, this is not considered necessary as the NPPF and saved and forthcoming policies of the Horsham Development Plan already make such provision and the Neighbourhood Plan is seeking to avoid repetition.

7.4 The six objectives have been chosen to provide a relevant framework within which to distinguish policy attributes and to compare them with any reasonable alternative policy approaches. They reflect the environmental characteristics of the parish and the intended focus of the Neighbourhood Plan. The absence of an objective does not necessarily mean that it is of not value but that its inclusion would not have helped the assessment of the Plan's objectives and policies.

7.5 For example, whilst fluvial flood risk is an issue in parts of the parish, the focus of the Plan policies on key areas of the main village of Pulborough, which do not have those risks, meant that this matter would not be relevant in comparing policy alternatives. Flood risk from ground or surface water can be mitigated in the detailed evaluation of the flood risk assessments of planning applications so have not influenced the locational choices of the Plan. Similarly, Natural England has suggested adding a measure related to impacts on The Mens SSSI beyond the Parish boundary. This too is not a factor that will inform the policy choices of the Plan, which are far smaller in scale than would be the case with District-level choices.

| <b>Neighbourhood Plan<br/>SA/SEA Objective</b> | <b>Neighbourhood Plan SA/SEA Measures</b>   |
|--|---|
| <b>Housing</b>                                 | 1A - will the PPNP improve the availability of decent, affordable housing?<br><br>1B – will the PPNP provide a range of housing types of various sizes and tenures?<br><br>1C – will the PPNP make better use of brownfield land for housing?           |
| <b>Community Facilities</b>                    | 2A - Will the PPNP sustain or increase the provision of community facilities?   |
| <b>Biodiversity</b>                            | 3A - Will the PPNP lead to the loss to biodiversity, flora or fauna as a result of development, either directly or through habitat fragmentation?<br><br>3B – Will the PPNP lead to any significant effects on the Arun Valley Special Protection Area? |
| <b>Landscape</b>                               | 4A - Will the PPNP result in a deterioration of the quality of the landscape or village-scape?<br><br>4B – Will the PPNP sustain the special landscape and scenic beauty of the South Downs National Park?  |
| <b>Heritage</b>                                | 5A - Will the PPNP sustain and enhance heritage assets (e.g. Listed buildings, archaeological sites, ancient monuments, Conservation Areas?) and their settings?  |



|                   |  |
|-------------------|--|
| <b>Employment</b> | 6A – Will the PPNP lead to the creation of new jobs in the parish or, at the very least, the retention of existing jobs? |
|-------------------|--|

*Table A: Pulborough Parish Neighbourhood Plan SA/SEA Framework*

7.6 The sixth objective on the local economy has been added on the recommendation of the District Council and also to reflect the desire of the Plan to contain economic development policies. The matter of air quality was also considered as an objective at the request of the District Council. This was discounted, however, as the scale of development to be provided for by the Plan is very small in relation to the existing distribution and scale of land uses in the village, and with no meaningful proxy measures to inform such an assessment, this has not been included.

7.7 More generally, in most cases, it is acknowledged that data is not collected or reported at a parish scale to enable a sensible assessment. This makes the identification of cause-and-effect relationships between inputs and outputs very uncertain. However, the assessment does seek to identify the relative attributes of the policies of the Neighbourhood Plan to inform the reader.

#### Assessing the impact of the Neighbourhood Plan Strategic Objectives

7.8 The four strategic objectives of the Neighbourhood Plan are outlined in para 3.3 above. They cover a range of economic, social and environmental issues in support of realising the community's vision for the parish. Each of these objectives is assessed against the SA/SEA objectives in Table B below.

7.9 There is, not surprisingly, a strong correlation between the Plan objectives and those of the SA/SEA. Its environmental goals will ensure that the Plan takes full account of the special biodiversity, landscape and heritage assets and features within the parish and especially in close proximity to Pulborough village. The community objective matches well with the desire to see improvements in existing community facilities.

7.10 The housing and employment objectives could be regarded as being in an inevitable tension with the biodiversity and landscape (and potentially the heritage) SA/SEA objectives given the need for the Plan to meet new housing need from edge of settlement sites. However, the assessment assumes that any such impacts will be avoided through the policy choices made in pursuit of those objectives.

|   |                         | Housing | Community Facilities | Biodiversity | Landscape | Heritage | Employment |
|---|-------------------------|---------|----------------------|--------------|-----------|----------|------------|
|   | SA/SEA Objective        | 1       | 2                    | 3            | 4         | 5        | 6          |
|   | <b>PPNP Objectives:</b> |         |                      |              |           |          |            |
| 1 | Environment             |         |                      |              |           |          |            |
| 2 | Community               |         |                      |              |           |          |            |
| 3 | New Homes               |         |                      |              |           |          |            |
| 4 | Employment              |         |                      |              |           |          |            |

|  |  |
|--|--|
|  | Positive impact                        |
|  | No impact or some impact but mitigated |
|  | Negative impact                        |

*Table B: Summary Assessment of Plan Objectives*

#### Assessing the impact of the Neighbourhood Plan policies

7.11 The Neighbourhood Plan contains 15 policies, which have a series of social, environmental and/or economic impacts. Using the sustainability framework of Table A, the assessment of each policy is summarised below in Table C. The assessment is of the proposed policies with their mitigation measures.

|    |                                 | Housing | Community Facilities | Biodiversity | Landscape | Heritage | Employment |
|----|---------------------------------|---------|----------------------|--------------|-----------|----------|------------|
|    | SA/SEA Objective                | 1       | 2                    | 3            | 4         | 5        | 6          |
|    | <b>PPNP Policies:</b>           |         |                      |              |           |          |            |
| 1  | A Spatial Plan for the Parish   |         |                      |              |           |          |            |
| 2  | Land at New Place Farm          |         |                      |              |           |          |            |
| 3  | Land off Glebelands             |         |                      |              |           |          |            |
| 4  | Royal Mail Sorting Depot        |         |                      |              |           |          |            |
| 5  | London Road Commercial Area     |         |                      |              |           |          |            |
| 6  | Broomers Hill Industrial Estate |         |                      |              |           |          |            |
| 7  | Toat Cafe                       |         |                      |              |           |          |            |
| 8  | Pulborough Garden Centre        |         |                      |              |           |          |            |
| 9  | Community & Sports Centre       |         |                      |              |           |          |            |
| 10 | Land off Stopham Road           |         |                      |              |           |          |            |
| 11 | West Glebe                      |         |                      |              |           |          |            |
| 12 | Tourism Development             |         |                      |              |           |          |            |
| 13 | Community Facilities            |         |                      |              |           |          |            |
| 14 | Local Green Spaces              |         |                      |              |           |          |            |
| 15 | Design                          |         |                      |              |           |          |            |

*Table C: Summary Assessment of Proposed Policies*

7.12 Policy 1 - A Spatial Plan of the Parish, which makes provision for the expansion of the main village for approximately 120 new homes, assesses especially well against the SA/SEA objectives, with likely positive effects in supplying a range new homes across a range of open market and affordable types. The reuse of brownfield land avoids the sensitive landscape further beyond the settlement boundary and will enhance the edge of the village when viewed from the east.

7.13 Most importantly, this spatial plan choice acknowledges the value of growing the village at the right scale as close to the primary school, and many other local services, as possible. The very limited capacity of the school will be able to accommodate this level of growth and its close proximity will encourage walking trips to the school and other services. It also allows for a direct relationship to be established between the development schemes coming forward in this area and investment (through S106) in planned improvements to the existing recreational and sports facilities in the village, thus having a very positive effect on the Community Facilities SA/SEA objective. Finally, this part of the village has no heritage or biodiversity assets that are affected by this scale and type of growth.

7.14 The support of Policy 2 for the allocation of housing on land at New Place Farm assesses well, in supplying approximately 100 new homes for the area. Its brownfield status as former nursery land means that a housing scheme will make an efficient use of the land in an accessible location. The policy does not score negatively on the employment measure as the land is no longer part of the operational nursery, which appears to have a healthy commercial future. The retention of the existing structural landscape in and around the site offers potential to improve its biodiversity value and to strengthen its landscape buffer to the open countryside beyond. And the ability of the scheme to justify a direct \$106 financial contribution to improving the nearby recreational and sports facilities in the village means the policy will have a series of positive impacts on the SA/SEA objectives.

7.15 Policy 3 is distinct from the adjoining allocation of Policy 2 as its purpose is different. Its focus is on delivering specific housing types and tenures to meet local housing (affordable and self-build) needs, ideally to be delivered by a new Community Land Trust. The policy will therefore have a positive effect on the SA/SEA housing objective and it will also deliver community benefits consistent with that SA/SEA objective. As with Policy 2, the policy includes design principles that will retain the biodiversity and landscape value of existing site features and requires a new buffer to the countryside to the east, thereby ensuring the policy will have a neutral effect on the other SA/SEA objectives.

7.16 The support for the redevelopment of the Royal Mail Sorting Depot on Lower Street in Policy 4 for retail or other village centre uses has positive housing and employment effects as it provides for new homes and new commercial space in the Lower Street village centre. It also has a positive heritage effect in enhancing the western entrance and therefore setting of the Lower Street Conservation Area. There are no negative effects in all other respects.

7.17 The support of Policy 5 at London Road Commercial Area for development of commercial and or community uses, with some enabling residential uses, will have some positive effects on meeting local housing needs, improving community facilities and creating or sustaining local jobs. It has neutral effects, as the policy requires the development not to harm the amenities of the residential area and ensures appropriate pedestrian access and car parking.

7.18 Policy 6 encourages the extension of the Broomers Hill Industrial Estate for a development of a new business centre. The policy will have a very positive employment effect in creating new jobs as an extension to the existing successful industrial estate with excellent road access. The policy requires that a future scheme will have to take account of delivering an effective landscape screen to the surrounding countryside, thus mitigating any potential negative landscape effects.

7.19 Policy 7 supports development proposals for a hotel use or car showroom use of land off the A29 at the Toat Café. This policy is taking the opportunity to make more effective use of a brownfield site that is considered an eyesore in the parish. Together with ensuring appropriate access and an effective landscape scheme this policy has a positive employment and landscape effect in both creating new jobs and enhancing the appearance of this prominent site at the main northern approach to the village.



7.20 Confining the employment benefit of Policy 8 to a specific site area primarily focused on the existing cluster of buildings on the Garden Centre site, which lies within the setting of the South Downs National Park, will ensure the special landscape and scenic beauty of the Park is conserved. The Centre has a popular café used by the local community and so the policy also has a positive community effect.

7.21 Policy 9 supports proposals for the expansion of existing facilities on Rectory Close to meet growing demand for recreational facilities from the larger village population. The Parish Council has developed plans for this expansion and will utilise funds already collected from past development projects. This will have a positive community effect and is otherwise neutral.

7.22 Policy 10 allocates land adjoining Pulborough Railway Station for a new public car park to serve the station and a small housing scheme along Stopham Road, through and with which the access to the car park will be made and shared. The need for a new station car park was identified in the Pulborough Community Action Plan and then Village Transport Plan, both of 2010, and is regarded by the local community as a crucial step in encouraging greater use of the station by the local workforce. The reports highlighted the car parking capacity and disabled access problems to the platforms and identified the option of creating a new car park on the western side of the station to serve the northbound platform. A planning application has been submitted for this scheme, which is in line with the key principles of those reports and is therefore supported by the Parish Council. The proposed policy will ensure these principles are adhered to. For example, one of the matters raised was the potential effect the development could have on the setting to the South Downs National Park, which lies beyond the site to the west and south. The submitted information of the planning application shows how these and all other matters (e.g. access, design, ecology, affordable housing) can be satisfactorily addressed to mitigate any potential negative effects on the setting of the Park. And in removing the current unsightly, haphazard car parking along Stopham Road, the scheme will improve the appearance of the National Park and village entrance in this prominent location. Therefore this policy will have a number of positive effects and is otherwise neutral.

7.23 Policy 11 proposes to extend the graveyard on to land a West Glebe. It will further propose a layout of new public footpaths across this land and this has an overall positive community effect as such proposals need to ensure they do not harm the openness of the proposed Local Green Space designation.

7.24 Policy 12 offers general support for tourism development to encourage trips from the station into the National Park. It does not specify any land or route and it acknowledges the importance of the setting to the Park in this area to ensure that proposals must have special regard to that matter. The policy has positive employment effect as tourism development will normally lead to some local job creation.

7.25 Policy 13 defines a number of valued community buildings for retention and improvement to maintain their viability in future years. The policy therefore has a positive effect in terms of sustaining community facilities and is neutral in all other respects.

7.26 The Local Green Space designations of Policy 14 will have a range of potentially positive environmental effects, depending on the location. The spaces have a combination of recreational and/or visual value so the policy will have positive effects in terms of sustaining open spaces as community facilities, as well as retaining local biodiversity, landscape and/or heritage interest in sustaining the character of the village.

7.27 Policy 15 on design guidance should ensure that any development in the parish, including in the policies above, will need to reflect the local character in general and the adopted Design Statements of Pulborough and Nutbourne specifically. The policy further protects the South Downs National Park in conditioning any development proposal to avoid causing harm to its landscape and scenic beauty. The policy therefore has positive landscape/villagescape and heritage effects.

#### Assessing the impact of any reasonable policy alternatives

7.28 In Table D, the assessment is of the reasonable policy alternatives. This enables the assessment to show the sustainability benefits of the chosen policies compared to those alternatives.

7.29 The reasonable alternative to the spatial plan of Policy 1 was for the policy to allow for settlement boundary changes to accommodate the extension of Codmore Hill. A number of sites have been made available for development either side of the A29 in the Horsham SHLAA of 2014. In practice, given the sites demonstrate similar locational characteristics, this option had to assume that if the Plan justified a boundary change in one location at Codmore Hill, it would have to apply the same approach to all the potential changes, resulting in a scale of housing development of approximately 300 - 400 new homes.

7.30 The assessment indicates that this option will deliver a very positive outcome in respect of meeting local housing need and certainly more so than the preferred option. That said, there is no indication that the HDPF requires or expects such a scale of housing contribution from the parish to meet the overall level of housing for the District. There is also the question of whether or not this scale of housing located this close to the Arun Valley SPA would trigger an Appropriate Assessment and this may be considered further in the separate Habitats Regulations Assessment. Certainly, it compares poorly with the preferred option in providing three times the scale of housing development.

7.31 However, it also performs poorly in having likely negative effects on community facilities and the landscape. This scale of housing development, which like the recent housing schemes in this location would rely on car trips to access the school, could in any event not be accommodated by the school capacity, which is not capable of being increased on the present site. The limitations of this location were acknowledged in the Inspector's decision on the Oddstones sites (DC/09/0488) but the scheme was consented on housing supply grounds.

7.32 Nor would it be able to justify a \$106 financial contribution to improvements to existing facilities in the main village as this would not be regarded as meeting the new tests of such agreements. The existing community infrastructure in Codmore Hill is not able to meet the needs of the new homes there. This scale of new development would only serve to increase those problems but be insufficient to invest in making the step

change in infrastructure required to achieve a critical mass at Codmore Hill. The Plan could not expect any new housing planned to make up for a lack of infrastructure provided by past development schemes in this respect. Furthermore, the landscape around much of Codmore Hill has been assessed as being of relatively greater sensitivity than the areas around the main village. Although impacts may be possible to mitigate, the location compares less well than the preferred option.

7.33 The alternative to Policy 2 was to retain it as a form of employment land, given its former horticultural use. Assuming this option would be viable, which is very questionable in this location, it scored well in creating new jobs. But, the option would lose the opportunity to meet the need for new homes and to deliver improvements to the nearby community facilities.

7.34 The alternative to Policy 3 was to leave the land outside the built up area boundary as greenfield land. This option would result in negative housing and community effects with the loss of this opportunity to deliver an innovative, community-led housing scheme. It would have neutral effects on all other SA/SEA objectives as the status and nature of the land would remain as it is.

7.35 The alternative to Policies 4 to 9 was to not have a policy on the various sites and to leave their future use and development to planning applications and the Horsham strategic and development management policy framework. In general, the result would have only neutral effects as that framework ought to be sufficient to ensure future proposals are appropriate. However, some cases there may be an opportunity cost of the absence of positive neighbourhood planning policy dissuading the submission of a planning application that may be supported.

7.36 For example, were the Plan to remain silent in respect of the Broomers Hill (Policy 6), Toat Café (Policy 7) and Garden Centre (Policy 8) sites, then such proposals may not win planning consent as they all fall outside the built up area boundary of the village. In which case, the opportunity to secure a positive economic development effect will be lost. In each case, the permissiveness of the policy is contained within design principles in the policy that acknowledge local landscape sensitivities and seek to avoid any harmful effects. Not having a policy on these matters will be neutral in all other respects.

7.37 There are possibly two alternatives to Policy 10. Firstly, it may have been possible to achieve an improvement to car parking to the east of the station and find another means of improving platform access. This may have avoided the need for development to the west of the station. However, neither Network Rail or the franchise operator had expressed any interest in making such an investment and the only land available east of the station is at West Glebe or on the industrial estate. This option was not seen as practical. The housing element of the scheme is also regarded as essential to the financing of the car park scheme and new access road.

7.38 The second alternative was not to make provision for a car park scheme at all. This would have negative effects on attempts to encourage employment, to improve the station as a valued community facility and to deliver new homes in a sustainable location. It would also result in the continuing, and perhaps increase in, unmanaged car parking along Stopham Road. Although the land is part of the setting to the

National Park it does not form such an obvious and important contribution to the character of the Park that would out-weigh the many benefits of the policy.

7.39 The absence of all the other policies 11 to 15 would have neutral effects as there will be a reliance on other policies of the Horsham development plan to achieve the same goals. It is arguable that there may be some positive or negative effects but these are very difficult to attribute to the absence of a policy.

|    | <b>ALTERNATIVE POLICY OPTIONS</b> | <b>Housing</b> | <b>Community Facilities</b> | <b>Biodiversity</b> | <b>Landscape</b> | <b>Heritage</b> | <b>Employment</b> |
|----|-----------------------------------|----------------|-----------------------------|---------------------|------------------|-----------------|-------------------|
|    | <b>SA/SEA Objective</b>           | <b>1</b>       | <b>2</b>                    | <b>3</b>            | <b>4</b>         | <b>5</b>        | <b>6</b>          |
| 1  | A Spatial Plan for the Parish     |                |                             |                     |                  |                 |                   |
| 2  | Land at New Place Farm            |                |                             |                     |                  |                 |                   |
| 3  | Land off Glebelands               |                |                             |                     |                  |                 |                   |
| 4  | Royal Mail Sorting Depot          |                |                             |                     |                  |                 |                   |
| 5  | London Road Commercial Area       |                |                             |                     |                  |                 |                   |
| 6  | Broomers Hill Industrial Estate   |                |                             |                     |                  |                 |                   |
| 7  | Toat Cafe                         |                |                             |                     |                  |                 |                   |
| 8  | Pulborough Garden Centre          |                |                             |                     |                  |                 |                   |
| 9  | Community & Sports Centre         |                |                             |                     |                  |                 |                   |
| 10 | Land off Stopham Road,            |                |                             |                     |                  |                 |                   |
| 11 | West Glebe                        |                |                             |                     |                  |                 |                   |
| 12 | Tourism Development               |                |                             |                     |                  |                 |                   |
| 13 | Community Facilities              |                |                             |                     |                  |                 |                   |
| 14 | Local Green Spaces                |                |                             |                     |                  |                 |                   |
| 15 | Design                            |                |                             |                     |                  |                 |                   |

*Table D: Summary Assessment of Policies' Alternative Options*

7.40 In overall terms, therefore, the sustainability effects of the Neighbourhood Plan are generally assessed as neutral but are occasionally positive. The proposed mitigation measures of most policies will effectively avoid any negative impacts. Only in respect of the reasonable alternatives are there any negative potential impacts. Further, the scale and location of specific development policies is such that there should be no cumulative effects on the objectives and nor with the effects of policies contained within the adjoining neighbourhood plans.

7.41 In addition, the District Council has screened for a Habitats Regulations Assessment of the policies of the Neighbourhood Plan, given the proximity of the parish to



designated nature areas of international importance. The screening has concluded that no Appropriate Assessment is necessary.

## **8. A description of measures envisaged concerning monitoring**

8.1 The Parish Council will monitor the progress in the implementation of the Neighbourhood Plan using the measures identified in Table A. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data on an annual basis to report on the progress of the plan. It is likely the Parish Council will choose to review the Neighbourhood Plan on a five yearly cycle and it will be informed by this monitoring activity in considering if and how to update the policies.