

2014 - 2031

Slinfold Neighbourhood Plan

Non-Technical Summary Sustainability Appraisal (incorporating Strategic Environmental Assessment)



Aerial photographs courtesy of Paul Armstrong,
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1. INTRODUCTION

- 1.1. The Slinfold Neighbourhood Plan (SNP) 2014-2031 has been prepared by Slinfold Parish Council (SPC) in accordance with the Neighbourhood Planning (General) Regulations 2012.
- 1.2. It sets out the Vision and Strategic Objectives of the Parish up to 2031 along with the policies and aims to deliver its Vision. It also includes housing allocations to contribute to meeting the housing need of the Parish.
- 1.3. A Sustainability Appraisal (SA) is a systematic process to promote sustainable development by assessing the extent to which a Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.4. A Strategic Environmental Assessment (SEA) involves the evaluation of the environmental impact of a Plan or programme. It is a requirement, as set out in the European Directive 2001/42/EC.
- 1.5. Government guidance (in a Practical Guide to the Strategic Environmental Assessment Directive (ODPM 2005)) suggests incorporating the SEA process into the SA and consider economic and social effects alongside the environmental effects considered through the SEA. This approach has been followed. For simplification, this report is referred to as a Sustainability Appraisal, although it incorporates the SEA.

2. SCOPING REPORT

- 2.1. The Scoping Report of the SA collated baseline data on broad areas of economic, social and environmental issues. It considered the implications of other plans and documents and set out a series of Sustainability Objectives. The Scoping Report also set out the proposed methodology for undertaking the SA.
- 2.2. The Scoping Report and baseline data was subject to public consultation with statutory bodies (Historic England, Natural England, the Environment Agency) in February 2015 for a five week period.

3. PRE SUBMISSION SUSTAINABILITY APPRAISAL

- 3.1. The Pre-submission SA was consulted on alongside the Pre-submission SNP for a 6 week period from 25 April 2016 until 06 June 2016.
- 3.2. The purpose of this SA was to assess whether the SNP may have effects on a range of sustainability topics and consider alternatives and mitigation to reduce any negative impact.
- 3.3. The Pre-submission SA set out;
 - The methodology of preparing the SA (inc SEA);
 - A summary of the baseline information, identification of the plans, policies and programmes that have an impact on the SNP (with updates) and a summary of the challenges for the future of the Parish; 1
 - The Sustainability Framework; objectives and indicators;

- An appraisal of policy options; and
 - Next steps.
- 3.4. In preparing the SNP a range of policy areas were considered and a range of options for each policy were identified. These were prepared based on the review of other relevant plans, programmes, policies, strategies and initiatives, the extensive baseline data for the Parish, and the overarching strategic objectives of the SNP. All policy options were appraised, to assess the impact on the 12 sustainability objectives set out in the Sustainability Framework.
 - 3.5. Whilst a number of the individual policies may have a negative impact, particularly on a specific small number of objectives, overall the policies in the Plan, taken as a whole will have a significant positive impact on the sustainability of the Parish.
 - 3.6. With respect to housing allocations, the SA tested a range of options which could facilitate the delivery of new housing in the Parish. The appraisal highlights Option C (to have a policy which sets out the housing need of the Parish at 60-100 based on a blend of identified affordable housing need, and trend based population projection with an average household size of 2.6 persons) as the preferred policy option given it facilitates housing growth to meet identified need in the Parish over the Plan period whilst limiting the impact on the environmental and traffic objectives.
 - 3.7. The SA included an update on baseline data relating to the Horsham District Planning Framework (HDPF). Since consultation on the Scoping Report in February 2015, the HDPF and the accompanying SA was subject to a further consultation on proposed modifications in March 2015. An additional hearing was subsequently held in July 2015 with the Inspector's Report issued in October 2015. The HDPF was subsequently adopted by the Council in November 2015.
 - 3.8. In response to feedback received from Historic England, additional information has been added to the baseline information that has informed the preparation of the SNP and the accompanying SA. Having reviewed feedback from the Natural England a minor amendment was made to the baseline data. No response was received from the Environment Agency.
 - 3.9. The Strategic Objectives of the SNP were assessed against the Sustainability Objectives. This demonstrated that most of the Strategic Objectives of the SNP and the Sustainability Objectives are compatible or have a neutral impact which indicated that the SNP was being prepared positively.
 - 3.10. The Sustainability Objectives were also assessed against themselves to test their mutual compatibility. This demonstrated that most Sustainability Objectives are either compatible or have a neutral impact.
 - 3.11. The Pre-submission SA appraised the draft policies of the SNP to assess the impact on the Sustainability Objectives. This appraisal was undertaken to ensure that the policies selected and taken forward in the Pre-submission Plan are the most sustainable, given reasonable alternatives. 2

4. SUBMISSION SUSTAINABILITY APPRAISAL

- 4.1. In response to consultation on the Pre-submission SNP and accompanying SA, circa 70 responses were received. Of those consulted, comments were primarily received on the housing site allocations.
- 4.2. Following Regulation 14 consultation, the NPWG has reflected on comments received during the Pre-submission consultation period and have considered appropriate amendments to the SNP. The NPWG has also had further discussions with key statutory bodies.
- 4.3. As a result, a number of minor amendments were made to the SNP to strengthen and clarify policies.
- 4.4. In response to feedback from HDC regarding the sustainability merits of the proposed allocation at Nowhurst and Bridge House Equestrian, both sites have been removed from the Submission Plan.
- 4.5. HDC have advised that Nowhurst Business Park is considered to be a strategic employment site, i.e. the provision of business use on this land would offer more than local employment provision. For this reason, HDC have advised that Officer intend to recommend the allocation of Nowhurst Business Park for employment use in the Site Allocation Development Plan Document and/or a review of the Local Plan. SPC has therefore agreed that the future of the site is best considered through a District level Development Plan Document.
- 4.6. HDC have also advised that the development of Bridge House Equestrian Centre should be considered outside the Neighbourhood Plan process (i.e. by way of a planning application to be considered on its own merits). SPC has therefore agreed that the site should not be allocated for residential development within the Neighbourhood Plan.
- 4.7. Having assessed reasonable alternative sites, SPC elected to allocate those sites which the Assessment has demonstrated will overall, and on balance, positively meet the Sustainability Objectives of the Plan. It is therefore considered that the allocation of East of Hayes Lane, End of West Way, Crosby Farm, West of Spring Lane and Cobblers will positively contribute to the delivery of housing over the Plan period.
- 4.8. The housing need for the Parish over the Plan period has been concluded to be 60-100 dwellings. The deletion of Nowhurst and Bridge House would reduce the housing allocation by 14 dwellings. The remaining 5 allocations would deliver some 77 dwellings. This, together with windfall development would deliver toward the upper end of the housing need range.
- 4.9. All potential housing sites were each tested against the Sustainability Framework (see Appendix 2). The Assessment has highlighted that all sites will positively contribute to the delivery of housing. The majority would be likely to include some provision of affordable housing. Sites that are close to existing services and facilities score more favourably against the Objectives which seek to enhance non-car modes of travel.
- 4.10. The assessment shows the majority of potential housing sites would have some negative impact on environmental Objectives. The extent of this varies dependent on the location of the site. In order to seek to facilitate the delivery of housing need in the Parish, it is considered inevitable there will be some harm, particularly against environmental Objectives. Mitigation measures to minimise this have been duly considered and are set out in individual housing sites assessments. 3

- 4.11. Having assessed reasonable alternative sites, the Parish Council elected to allocate those sites which the Assessment has demonstrated will overall, and on balance, positively meet the Sustainability Objectives of the Plan.
- 4.12. The policies seek the inclusion of the corporation of mitigation measures to minimise the negative effects of development as far as possible. The negative effects which have been identified are limited to the immediate environment and have been mitigated as far as possible. It is not considered that the cumulative in combination effects will be significant.
- 4.13. The Submission SNP and accompanying documents including the SA were finalised in April 2017.

5.0 POST EXAMINATION UPDATE

- 5.1 Horsham District Council received the Examiner's report relating to the SNDP on the 29 January 2018, and in response to this report published its decision statement on the 5 March 2018. The Council had a differing view on a small number of the recommendations put forward by the Examiner, and therefore held a further consultation on a number of proposed amendments to the plan where those differed from the Examiner. This consultation was held between **16 March 2018** and concluded on **the 4 May 2018**.
- 5.2 As part of this consultation, further evidence was provided to Horsham District Council particularly on Land relating to West Way. This site had been proposed for allocation by Slinfold Parish Council, but the Examiner had recommended that this site be removed. The Examiner was not presented with the information which has now been provided to Horsham District Council. This new evidence proposes a smaller housing scheme, together with provision of land for a new Scout Hut facility. Other sites may have greater capacity for development that was allocated in the plan.
- 5.3 In order to ensure that this new evidence has been given due consideration, Horsham District Council has updated the Sustainability Appraisal. This has therefore allowed the Council to come to a further judgement in its updated decision statement.
- 5.4 The outcomes of this sustainability appraisal process clearly show that all development proposals and policy options are likely to have impacts on the sustainability objectives. It is however considered that the adverse effects of allocating sites without ascribing a housing number can be easily mitigated to remove these impacts by including specific site criteria, and that this approach is therefore the most sustainable when ensuring housing needs are met (including delivering maximum levels of affordable housing), and preventing environmental harm. This requires taking part of the approach recommended by the Examiner of the Slinfold plan (i.e. removing site numbers), but still setting out the site specific mitigation measures which may be necessary to offset any environmental impacts.

5.5 The outcome of the individual assessments has found that all sites will have some negative impacts. On balance however, the West Way site performs slightly less well against the sustainability objectives than other locations. When cumulative impacts of developing multiple sites is also taken into account (as all could come forward simultaneously), a smaller number of sites with a slightly higher number of homes was found to be preferable, as this would ensure housing needs are met but minimise the total loss of greenfield land. Other potential cumulative impacts such as high levels of construction traffic accessing the village will also be reduced. On balance, and providing that policy specific mitigation is provided for the remaining allocations, it is considered that this would best ensure the achievement of sustainable development.

6 NEXT STEPS

- 6.1 This information within this report will need to be taken into account by the Council in reaching its final decision on the next steps. It will need to be published alongside any final plan that is published for referendum purposes.
- 6.2 Once made, and an SEA adoption statement is published the effects of implementing the SNP are to be monitored to assess any impacts, including unforeseen adverse impacts. This will take place in a number of ways, including through the Horsham District Council Authority Monitoring Report which is published in December each year. This will help to assess achievement of the policies against the 12 sustainability objectives and allow for measures to be put in place, particularly should unforeseen consequences arise.