

UPPER BEEDING PARISH COUNCIL

Neighbourhood Plan 2018-2031

Basic Conditions Statement

Submission Version

December 2018

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APPENDIX A **Habitat Regulations Assessment Screening Horsham District Council**

1.0 INTRODUCTION

The Purpose of the Basic Conditions Statement

- 1.1 This Basic Conditions Statement has been prepared to accompany the Upper Beeding Neighbourhood Plan (UBNP) being submitted under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 to Horsham District Council (HDC).
- 1.2 The Neighbourhood Planning (General) Regulations 2012 states that when a plan proposal is submitted to the Local Planning Authority (LPA), it must include a statement explaining how the proposed Plan meets the requirements of paragraph 8, of Schedule 4B to the Town & Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The core basic conditions for Neighbourhood Plans are as follows:
- (i) the draft UBNP must have appropriate regard to national policies and advice contained in the National Planning Policy Framework (NPPF);
 - (ii) the draft UBNP must contribute to the achievement of sustainable development;
 - (iii) the draft UBNP must be in general conformity with the strategic policies contained in the development plan for the area of the local planning authority, in this case the Horsham District Planning Framework (HDPF) 2015 and the Submission South Downs Local Plan 2018; and,
 - (iv) the draft UBNP must meet the relevant EU obligations.
- 1.3 This Basic Conditions Statement addresses these requirements are as follows:
- A. Demonstrates the conformity of the UBNP with the NPPF;
 - B. How the UBNP will contribute to sustainable development;
 - C. Demonstrates the conformity of the UBNP with the strategic policies of the Development Plan.
 - D. Demonstrates compliance with the appropriate EU obligations.

2.0 BACKGROUND TO THE NEIGHBOURHOOD PLAN

- 2.1 The Localism Act 2011 enables Town and Parish Councils to create a Neighbourhood Plan. The key driver of Upper Beeding Parish Council's decision to make a Neighbourhood Plan was the desire for the local community to have a greater say in future planning decisions.
- 2.2 The purpose of the Upper Beeding Neighbourhood Plan (UBNP) will be to set out a number of planning policies that can be used to determine planning applications in the area. The policies will aim to conserve and enhance the special character of the parish and to encourage development proposals for the benefit of the local community.
- 2.3 The regulations require that a Neighbourhood Plan deals with planning matters (i.e. the use and development of land), is submitted by a qualifying body, covers a stated Plan period and identifies a designated Neighbourhood Area.

Submitting Body

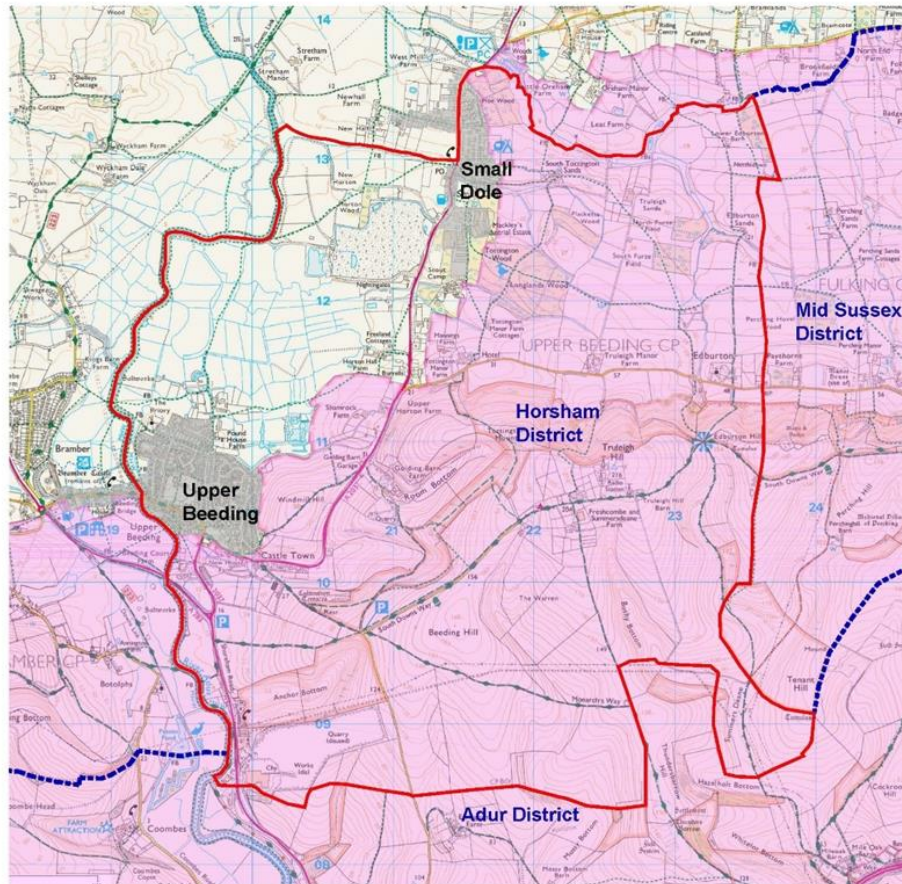
- 2.4 The Upper Beeding Neighbourhood Plan is submitted by Upper Beeding Parish Council, the qualifying body as defined by the Localism Act 2011.

Neighbourhood Plan

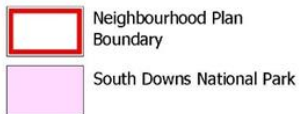
- 2.5 The policies set out within the Neighbourhood Plan relate to the development and use of land in the designated Neighbourhood Area. The plan period of the Neighbourhood Plan is from 2018 to 2031 and the document does not contain policies relating to excluded development, in accordance with the Regulations.
- 2.6 Once adopted, the Upper Beeding Neighbourhood Plan will become part of the Statutory Development Plan along with the Horsham District Planning Framework and the emerging South Downs Local Plan that will guide development in Upper Beeding up to 2031. What this means is that Horsham District Council and the South Downs National Park Authority (SDNPA) will consult the plan and use the planning policies within it, to determine whether to grant planning permission for planning applications made within the Neighbourhood Plan Area.

Neighbourhood Area

- 2.7 The designation of the Neighbourhood Plan area was made on 19th December 2013. The neighbourhood Plan area is shown on the map below.



Key



Map 1: Neighbourhood Area

Why Upper Beeding Needs a Neighbourhood Plan

2.8 Producing a Neighbourhood Plan is not compulsory and many areas have decided not to plan locally for their area, but rather leave it to the local planning authority to decide how their local areas are to grow and change.

2.9 The vision for Upper Beeding Parish in 2031 is:

Upper Beeding and Small Dole will have retained their own distinctive characters and they will have worked successfully with the South Downs National Park Authority (SDNPA) and West Sussex County Council (WSCC) to; protect the special qualities of the South Downs National Park landscape, improve accessibility for pedestrians, cyclists and equestrians, as well as providing safe routes to schools with better links to Bramber and Steyning, and to develop a green infrastructure plan that improves connections, recreation and leisure opportunities to and within the National Park for the community.

Upper Beeding's role as a provider of local shops will have been reinforced, and the range and diversity of the shopping and other commercial facilities will have grown to meet local needs without detriment to the character of the High Street. Community facilities will have expanded and become more varied to meet the changing needs of all groups and age ranges.

There will have been improvements in the range of employment uses on the existing employment sites, supporting an increase in local employment and benefits to the local economy. The Parish Council will have supported the SDNPA in bringing forward a successful regeneration development at Shoreham Cement works.

There will have been a modest growth in housing numbers through the provision of new homes, purpose designed to meet local needs including elderly downsizers, and to provide a balance of dwelling types to serve the community over the long term. These new homes will have been provided in small clusters on sites that do not detract from the character and setting of the Parish.

3.0 CONFORMITY WITH NATIONAL POLICY

Introduction

- 3.1 The UBNP was originally prepared with regard to national policies set out in the National Planning Policy Framework (NPPF) 2012. However, the NPPF has been recently updated (24th July 2018). The new Framework states that the 2012 NPPF will apply for the purpose of examining plans, when those plans are ‘submitted’ on or before 24th January 2019.¹ The NP was updated in October 2018 to include reference to the 2018 NPPF.
- 3.2 The 2012 NPPF set out how neighbourhood plans should be prepared and what they should facilitate (paragraphs 183 -185). Importantly, paragraph 183 explained that “neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.” What the above makes clear is that it must contain a clear vision that the plan itself must deliver. The UBNP does contain a central vision which has been subject to considerable community consultation and has heavily influenced the policies contained within. This is outlined in the section above.
- 3.3 The 2018 NPPF includes, in paragraphs 28-30, how neighbourhood plans should set out non-strategic policies for an area. Paragraph 37 relates to the Basic Conditions.
- 3.4 Both versions of the NPPF refer to sustainable development. The ‘golden thread’ running through the NPPF 2012 is a requirement for development plans to comply with the aims of sustainable development. There is a presumption in favour of sustainable development. Paragraph 7 confirms that sustainable development comprises the three dimensions of economic, social and environmental. In order to achieve the aims of sustainable development policies must seek to deliver all three strands. Paragraphs 14 to 16 of the NPPF 2012 set out the presumption in favour of sustainable development, which is at the heart of national policy. Subsequent paragraphs in the NPPF discuss, in detail, how to deliver sustainable development.

¹ For Neighbourhood Plans, submission in this context means where a qualifying body submits a plan proposal to the local planning authority in accordance with regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

- 3.5 NPPF 2018 states the following (in paragraph 10) 'so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development'. The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (paras 12 and 13).
- 3.6 The UBNP is accompanied by a Sustainability Appraisal, which has fully assessed the sustainability of all policies in the NP and found them to meet the aims of sustainable development.
- 3.7 The Table below sets out set out how the NP has had regard to national planning policies, most notably those contained in the NPPF 2012 and NPPF 2018. This statement confirms that the neighbourhood plan is in compliance with the NPPF (2018).
- 3.8 The development of the UBNP has also fully taken into account the guidance provided in the National Planning Practice Guidance covering the range of policy matters within the Plan and also generally on the approach to preparing neighbourhood plans

Neighbourhood Plan Section/Policy	Relevant NPPF 2012 Core Principle/Paragraph	Relevant revised NPPF 2018 Section	Summary/Conclusion – how the plan has had regard to both NPPFs
Whole Plan	<p>Core Principles: (para. 17)</p> <ol style="list-style-type: none"> 1. Genuinely plan led empowering local people to shape their surroundings with succinct local and neighbourhood plans setting out a positive vision for the future. 2. The process is not simply about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives. 3. Pro-actively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. 4. Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. 6. Support the transition to a low carbon future in a changing climate, encourage the reuse of existing resources, including conversion of existing buildings. 7. Encourage the effective use of land by reusing land that has been previously developed (brownfield land). 10. Conserve heritage assets in a manner appropriate to their significance, so they can be enjoyed for their contribution to the quality of life of this and future generations 12. Take account of and support local strategies to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs 	<p>Para 17 was not carried forward in new NPPF.</p> <p>Section 3 Plan making/paragraph 15 onwards states: The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.</p> <p>Para 16. Plans should:</p> <ol style="list-style-type: none"> a) be prepared with the objective of contributing to the achievement of sustainable development b) be prepared positively, in a way that is aspirational but deliverable; c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; e) be accessible through the use of digital tools to assist public involvement and policy presentation; and f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). 	<p>The NP comprises policies that have been drafted to reflect the local community's vision for the area. They are local policies of relevance to the NP area. The policies provide a practical framework in which to assess planning applications. The Parish Council has sought to engage effectively with the local community, local organisations, statutory authorities and landowners. and this is set out in the Consultation Statement.</p> <p>The UBNP is a succinct and up-to-date plan and provides a positive framework for a number of policy areas relevant to the area.</p> <p>The Neighbourhood Plan also seeks to not duplicate policies contained in national and local plans and ensures policies are relevant and focussed on Upper Beeding rather than being too general and non-specific.</p> <p>The NPPFs provide a policy presumption in favour of sustainable development. The policies in the neighbourhood plan are in compliance with the main thrust of both NPPFs and guidance.</p>

<p>Vision and Objectives</p>	<p>Para. 17 – Succinct local and neighbourhood plans should set out a positive vision for the future of the area.</p> <p>Para 58. Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.</p>	<p>Para 15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.</p> <p>Para 29. Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.</p> <p>1</p>	<p>A clear vision is set out in the UBNP which has been subject to community consultation. The Plan has a focus on sustainability and sustainable development and the high landscape quality of the Parish and the South Downs National Park. It supports good design principles, new housing, local community and retail facilities and employment opportunities. It focusses on making the area a more attractive place to live, work and visit. The vision is in compliance with the relevant NPPF principles.</p> <p>The neighbourhood plan does not promote less development than the development plan and contains non-strategic policies. It is in general conformity with strategic policies in the local plans of Horsham District Council and South Downs National Park.</p>
<p>Policy 1: Spatial Plan for the Parish</p>	<p>Core Principles: (para. 17) Genuinely plan led empowering local people to shape their surroundings with succinct local and neighbourhood plans setting out a positive vision for the future. The process is not simply about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives. Encourage the effective use of land by reusing land that has been previously developed (brownfield land).</p>	<p>Making effective use of land Para 117. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.</p>	<p>Policy 1 sets out a clear spatial strategy for the NP – in accordance with advice within both NPPFs. It promotes the effective use of land and sustainable development and seeks to protect the countryside beyond the settlement boundary.</p>
<p>Housing Polices Policy 2: Housing Allocations</p>	<p>Core Principles: (para 17) Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area,</p>	<p>Plan Making Para 15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.</p>	<p>The policies set out in this section identify where new housing in Upper Beeding will be located and what type of housing needs to be delivered. The Government requires that local authorities should meet their objectively assessed housing needs for market</p>

<p>Policy 3: Land east of Pound Lane, Upper Beeding</p> <p>Policy 4 – Land at southern end, Oxcroft Farm, Small Dole</p> <p>Policy 5 Land at Greenfields, Henfield Road, Upper Beeding</p> <p>Policy 6 – Riverside Caravan Park, Upper Beeding</p>	<p>and respond positively to wider opportunities for growth</p> <p>Para. 47 – To boost significantly the supply of housing - use evidence base to ensure plans meet the full, objectively assessed needs for market and affordable housing.</p> <p>Para. 49 – Housing applications should be considered in the context of the presumption in favour of sustainable development.</p> <p>Para. 50 – To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, LPAs should:</p> <p>Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).</p> <p>Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</p> <p>Para 174. Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing.</p>	<p>Delivering a sufficient supply of homes</p> <p>Para 59. To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.</p> <p>Para 68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.</p> <p>Para 69. Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area.</p> <p>Making effective use of land</p> <p>Para 117. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.</p>	<p>and affordable housing. Horsham District Council has set out their overarching approach to the distribution of housing to meet that need in their Development Framework. AECOM were instructed to identify the housing need for Upper Beeding.</p> <p>The housing policies provide a clear direction on where housing development would be suitable within the parish. The policies also set out where mixed communities would be appropriate and where a range of housing types can be accommodated. The policies comply with the provisions within both NPPFs.</p> <p>The site specific policies provide for a range of sites suitable for new housing developments including smaller sites and brownfield sites. This is in accordance with the NPPFs.</p>
<p>Other Residential Policies</p> <p>Policy 7 Land at Valerie Manor, Henfield Road, Upper Beeding</p>	<p>Para 50. To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:</p> <ul style="list-style-type: none"> • plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes). 	<p>Delivering a sufficient supply of homes</p> <p>Para 61. The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.</p>	<p>The UBNP provides for accommodation for residential care home needs. Policy 7 This need has been assessed as required within the local (and wider) area and is in accordance with the advice within both NPPFs.</p>

	Para 159. Local planning authorities should have a clear understanding of housing needs in their area.		
Design Policy Policy 8 Design Standards for New Development	<p>Core principles (para. 17) Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.</p> <p>Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</p> <p>Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).</p> <p>Para. 56 - The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people</p> <p>Para. 58 - Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.</p> <p>Para. 60 - Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is,</p>	<p>Achieving well-designed places Para 124. The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.</p> <p>Para 125. Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.</p> <p>Para 127. Planning policies and decisions should ensure that developments – a number of criteria is set out under this paragraph including:</p> <p>Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;</p> <p>Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);</p>	<p>Many of the core principles of the NPPF 2012 are reflected in Policy 8. It is a comprehensive policy that confirms high quality and sustainable development will be expected for the area. The policy also seeks to create a strong sense of place and takes into account the location of part of the parish within the National Park.</p> <p>The policy therefore complies with the provisions of both NPPFs.</p>

	<p>however, proper to seek to promote or reinforce local distinctiveness.</p> <p>Para. 95 – LPAs should actively support energy efficiency improvements to existing buildings.</p> <p>Para. 97 – LPAs should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources</p>	<p>Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.</p> <p>Para 149. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.</p>	
<p>Community Policy</p> <p>Policy 9 Community Facilities</p>	<p>Para 70. Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.</p>	<p>Para 92. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.</p>	<p>This policy within the UBNP seeks to preserve and enhance existing community facilities. The policies also support the creation of new open spaces. It also seeks to support new facilities being provided. These are in accordance with both NPPFs.</p>
<p>Employment Policy</p> <p>Policy 10 Employment Sites and Supporting Businesses</p>	<p>Core planning principles</p> <p>Para 17. Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.</p> <p>Building a strong, competitive economy</p> <p>Para 18. The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent</p>	<p>Building a strong, competitive economy</p> <p>Para 80. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.</p> <p>Para 81. Planning policies should:</p> <p>a) set out a clear economic vision and strategy which positively and proactively encourages sustainable</p>	<p>The UB Neighbourhood Plan is positively focussed on the need to support local businesses and the local economy. The policy seeks to retain existing business areas and ensure any local business is able to relocate/locate within the parish.</p> <p>The policies are in accord with both NPPF documents which seek to drive sustainable economic development.</p>

	<p>strengths, and to meeting the twin challenges of global competition and of a low carbon future.</p> <p>Para 21. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.</p> <p>Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area.</p> <p>Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;</p> <p>Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.</p> <p>Para 37. Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p>	<p>economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</p> <p>b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</p> <p>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</p> <p>d) be flexible enough to accommodate needs not anticipated in the plan.</p> <p>Para 82. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>	
<p>Green Space Policy</p> <p>Policy 11 Local Green Spaces</p>	<p>Para 73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.</p> <p>Para 76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green</p>	<p>Open space and recreation</p> <p>Para 99. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them.</p>	<p>The creation of Local Green Spaces is set out in both NPPFs. Policy 11 allocates local green spaces in accordance with the NPPF advice.</p>

	Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.		
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4.0 DELIVERING SUSTAINABLE DEVELOPMENT

- 4.1 For the UBNP, sustainable development has been the fundamental basis of each of its policies. The Plan is accompanied by a Sustainability Appraisal (SA), incorporating the Strategic Environmental Assessment (SEA), of its environmental, social and economic effects.
- 4.2 The SA demonstrates that the Neighbourhood Plan will positively contribute to achieving sustainable development and will not have any significant adverse impacts. This has been submitted at Regulation 16 stage as part of the evidence base supporting the NP and should be read alongside this Basic Conditions Statement.
- 4.3 The sustainability objectives of the UBNP comprise a balance of social, economic and environmental goals. The submitted policies are therefore intended to accurately translate these objectives into viable and effective development management policies and deliverable infrastructure proposals at the Parish level. All policies contained within the Submission Version of the UBNP have been tested within the SA to ensure that the most sustainable policy option was chosen. The SA carefully appraises each policy against a series of alternatives and then compares them to the sustainable objectives.
- 4.4 The Table below summarises how the objectives and policies in the UBNP sit under the sustainable development definition as defined in the NPPF 2018.

Deliver economic sustainability	
NPPF Definition: To help build a strong, responsive and competitive economy	
UBNP Sustainability Objective	<p>Objective 2 To support the role of Upper Beeding as a local shopping centre with increased commercial activity, visitors and tourism whilst protecting the character of the High Street.</p> <p>Objective 4 To secure the future of the existing employment uses within the Parish and plan for their growth to serve and support the local economy.</p>
UBNP Policies	Policy 10 Employment Sites and Supporting Businesses
Deliver social sustainability	
NPPF Definition: To support strong, vibrant and healthy communities	
UBNP Sustainability Objective	<p>Objective 3 To support the provision of new and improved community, sports, leisure and educational facilities for a wide range of parish needs and to reinforce a shared identity and purpose.</p> <p>Objective 5 To plan positively for new housing to meet local needs, in particular for elderly downsizers, that are sympathetic to the</p>

	scale, topography and character of the Parish and that will not have a detrimental impact on the setting.
UBNP Policies	<p>Policy 1 Spatial Plan for the Parish</p> <p>Policy 2 Housing Allocations</p> <p>Policy 3 land east of Pound Lane, Upper Beeding</p> <p>Policy 4 Land at southern end of Oxcroft Farm, Small Dole</p> <p>Policy 5 Land at Greenfields, Henfield Road, Upper Beeding</p> <p>Policy 6 Riverside Caravan Park, Upper Beeding</p> <p>Policy 7 Land at Valerie Manor, Henfield Road, Upper Beeding</p> <p>Policy 9 Community Facilities</p> <p>Policy 11 Local Green Spaces</p>
Environmental sustainability	
NPPF definition: To contribute to protecting and enhancing our natural, built and historic environment	
UBNP Sustainability Objective	<p>Objective 1 To protect the character, qualities and identity of the landscape setting of the Parish and maintain the distinctive character of the settlements.</p> <p>Objective 6 To develop a green infrastructure plan for the Parish that will improve accessibility for pedestrians, cyclists and safe routes to school and for better links to Bramber and Steyning. To provide access to, and enjoyment of the SDNP as a recreation and leisure amenity.</p> <p>Objective 7 To ensure the built environment, natural environment and areas of biodiversity are protected and enhanced for future generations. This includes protecting areas of open space.</p> <p>Objective 8 To support South Downs National Park Authority in the future planning of the Cement works.</p>
UBNP Policies	<p>Policy 8 Design Standards for New Development</p> <p>Policy 11 Local Green Spaces</p>

5.0 GENERAL CONFORMITY WITH STRATEGIC POLICIES IN THE DEVELOPMENT PLAN

- 5.1 One of the basic conditions that Neighbourhood Plans must satisfy is that they are in general conformity with the strategic policies of the adopted development plan for the local area, i.e. the high-level strategic elements in the adopted local plan that are essential to delivering the overall planning and development strategy for the local area.
- 5.2 In the case of the UBNP this includes the Horsham District Planning Framework (HDPF) 2015. The Submission South Downs Local Plan 2018 is due to be Examined in December 2018 and therefore is at an advanced stage in the process. Horsham District Council is reviewing its Local Plan (September 2018). The HDPF, with the exception of land within the South Downs National Park, replaces the policies contained in the Horsham District Core Strategy and General Development Control Policies which were both adopted in 2007.
- 5.3 The HDPF 2015 sets out the strategic policy context for the District of Horsham until 2031. It therefore forms the local planning policy with which the Upper Beeding Neighbourhood Plan must be in general conformity. As the South Downs Local Plan has reached a fairly advanced stage, the Neighbourhood Plan has sought to be in general conformity with the strategic policies of this plan.
- 5.4 The Table below shows how the UBNP policies conform with the strategic policies within the Development Plan for the NP area. Each strategic/relevant policy within the Development Plan is shown to correlate with a NP policy if this particular policy area is covered within the UBNP. In cases where there is no NP policy then this planning matter will be considered against the Development Plan and/or national policy. The Table below contains no summary/discussion text as in the majority of cases, the NP policies do not conflict with a Development Plan policy. It is usual for the text within the NP policy to only touch on the information contained within Development Plan policies as these tend to be more detailed. The only exception is with regard to employment policies/one site development policy within the UBNP. Policies within the Development Plan focus on retaining employment sites. However, UBNP Policy 5 - Land at Greenfields, Henfield Road seeks to redevelop an employment site for residential. The UBNP explains why this is considered acceptable and outlines an

alternative employment location within the Parish to accommodate the existing business.

Neighbourhood Plan and Development Plan Conformity

Relevant Local Plan Policy	Neighbourhood Plan Policy
Horsham District Planning Framework	Upper Beeding Neighbourhood Plan Policy
Policy 1 Strategic Policy: Sustainable Development.	Policy 1 Spatial Plan for the Parish
Policy 2 Strategic Policy: Strategic Development	There is no equivalent policy in the NP
Policy 3 Strategic Policy: Development Hierarchy.	There is no equivalent policy in the NP
Policy 4 Strategic Policy: Settlement Expansion	Policy 1 Spatial Plan for the Parish
Policy 7 Strategic Policy: Economic Growth.	Policy 10 Employment Sites and Supporting Businesses
Policy 12 Strategic Policy: Vitality and Viability of Existing Retail Centres.	There is no equivalent policy in the NP but outlined in Community Aspiration 4 - Community suggestions for retail/tourism and regeneration improvements.
Policy 15 Strategic Policy: Housing Provision	Policy 2 Housing Allocations Policy 3 land east of Pound Lane, Upper Beeding Policy 4 Land at southern end of Oxcroft Farm, Small Dole Policy 5 Land at Greenfields, Henfield Road, Upper Beeding Policy 6 Riverside Caravan Park, Upper Beeding Policy 7 Land at Valerie Manor, Henfield Road, Upper Beeding
Policy 16 Strategic Policy: Meeting Local Housing Needs	Policy 2 Housing Allocations
Policy 21 Strategic Policy: Gypsy and Traveller Sites Allocations	There is no equivalent policy in the NP
Policy 23 Strategic Policy: Gypsy and Traveller Accommodation	There is no equivalent policy in the NP
Policy 24 Strategic Policy: Environmental Protection	There is no equivalent policy in the NP
Policy 25 Strategic Policy: The Natural Environment and Landscape Character.	Policy 11 Local Green Spaces
Policy 26 Strategic Policy: Countryside Protection.	Policy 1 Spatial Plan for the Parish
Policy 27 Strategic Policy: Settlement Coalescence	There is no equivalent policy in the NP
Policy 32 Strategic Policy: The Quality of New Development.	Policy 8 Design Standards for New Development
Policy 35 Strategic Policy: Climate Change	Policy 8 Design Standards for New Development
Policy 36 Strategic Policy: Appropriate Energy Use	Policy 8 Design Standards for New Development
Policy 38 Strategic Policy: Flooding	There is no equivalent policy in the NP
Policy 39 Strategic Policy: Infrastructure Provision.	Policy 9 Community Facilities also Community Aspiration 3 - Community suggestions for community and social infrastructure improvements

Policy 42 Strategic Policy: Inclusive Communities	Policy 9 Community Facilities
Relevant Local Plan Policy	Neighbourhood Plan Policy
Horsham District Core Strategy 2007 (saved policies relevant to SDNP until South Downs Local Plan is adopted)	Upper Beeding Neighbourhood Plan Policy
CP1 Landscape and Townscape Character	Policy 8 Design Standards for New Development
CP2 Environmental Quality	Policy 8 Design Standards for New Development
CP3 Improving the quality of new development	Policy 8 Design Standards for New Development
CP4 Housing Provision	Policy 2 Housing Allocations Policy 3 land east of Pound Lane, Upper Beeding Policy 4 Land at southern end of Oxcroft Farm, Small Dole Policy 5 Land at Greenfields, Henfield Road, Upper Beeding Policy 6 Riverside Caravan Park, Upper Beeding Policy 7 Land at Valerie Manor, Henfield Road, Upper Beeding
CP5 Built-Up Area Boundary and previously developed land	Policy 1 Spatial Plan for the Parish
CP6 Strategic Location West of Crawley	Not relevant to UBNP
CP7 Strategic Allocation west of Horsham	Not relevant to UBNP
CP8 Small Scale Greenfield sites	There is no equivalent policy in the NP
CP9 Managing the Release of Housing Land	There is no equivalent policy in the NP
CP10 Employment Provision	There is no equivalent policy in the NP/ Community suggestions for Shoreham Cement Works
CP11 Employment sites and premises	Policy 10 Employment Sites and Supporting Businesses
CP12 Meeting Housing Needs	There is no equivalent policy in the NP. Individual housing policies touch on some aspects.
CP13 Infrastructure Requirements	There is no equivalent policy in the NP
CP14 Protection and Enhancement of Community Facilities and Services	Policy 9 Community Facilities also Community Aspiration 3 - Community suggestions for community and social infrastructure improvements
CP15 Rural Strategy	There is no equivalent policy in the NP/ Policy 1 Spatial Plan for the Parish
CP16 Inclusive Communities	There is no equivalent policy in the NP
CP17 Vitality and Viability of Existing Centres	There is no equivalent policy in the NP but outlined in Community Aspiration 4 - Community suggestions for retail/tourism and regeneration improvements.
CP18 Tourism and Cultural Facilities	There is no equivalent policy in the NP
CP19 Managing Travel Demand and Widening Choice of Transport	There is no equivalent policy in the NP/ Community Aspiration 2 - Community suggestions for road and access and public transport improvements
Relevant Local Plan Policy	Neighbourhood Plan Policy
Pre-Submission South Downs Local Plan and Modifications	Upper Beeding Neighbourhood Plan Policy
Core Policy SD1: Sustainable Development	Policy 1 Spatial Plan for the Parish
Core Policy SD2: Ecosystems Services	There is no equivalent policy in the NP

Core Policy SD3: Major Development	There is no equivalent policy in the NP/Community suggestions for Shoreham Cement Works
Strategic Policy SD4: Landscape Character	There is no equivalent policy in the NP /Policy 8 Design Standards for New Development
Strategic Policy SD5: Design	Policy 8 Design Standards for New Development
Strategic Policy SD6: Safeguarding Views	There is no equivalent policy in the NP
Strategic Policy SD7: Relative Tranquillity	There is no equivalent policy in the NP
Strategic Policy SD8: Dark Night Skies	There is no equivalent policy in the NP
Strategic Policy SD9: Biodiversity and Geodiversity	There is no equivalent policy in the NP
Strategic Policy SD10: International Sites	There is no equivalent policy in the NP
Strategic Policy SD12: Historic Environment	There is no equivalent policy in the NP
Strategic Policy SD17: Protection of the Water Environment	There is no equivalent policy in the NP
Strategic Policy SD19: Transport and Accessibility	There is no equivalent policy in the NP/ Community Aspiration 2 - Community suggestions for road and access and public transport improvements
Strategic Policy SD20: Walking, Cycling and Equestrian Routes	There is no equivalent policy in the NP/ Community Aspiration 2 - Community suggestions for road and access and public transport improvements
Strategic Policy SD23: Sustainable Tourism	There is no equivalent policy in the NP/Community Aspiration 4 - Community suggestions for retail/tourism and regeneration improvements.
Strategic Policy SD25: Development Strategy	Policy 1 Spatial Plan for the Parish
Strategic Policy SD26: Supply of Homes	Policy 2 Housing Allocations
Strategic Policy SD27: Mix of Homes	Policies for individual housing sites include reference to housing types/mix/appropriate developments for the site. Reference is also made to other types of housing such as sheltered housing in individual policies.
Strategic Policy SD28: Affordable Homes	Policies for individual housing sites include reference to housing types/mix/appropriate developments for the site.
Strategic Policy SD29: Rural Exception Sites	There is no equivalent policy in the NP
Strategic Policy SD33: Gypsies and Travellers and Travelling Show people	There is no equivalent policy in the NP
Strategic Policy SD34: Sustaining the Local Economy	Policy 10 Employment Sites and Supporting Businesses
Strategic Policy SD35: Employment Land	Policy 10 Employment Sites and Supporting Businesses
Strategic Policy SD36: Town and Village Centres	There is no equivalent policy in the NP/Community Aspiration 4 - Community suggestions for retail/tourism and regeneration improvements.
Strategic Policy SD42: Infrastructure	There is no equivalent policy in the NP
Strategic Policy SD45: Green Infrastructure	Policy 11 Local Green Spaces
Strategic Policy SD48: Climate Change and Sustainable Use of Resources	Policy 8 Design Standards for New Development
Strategic Policy SD49: Flood Risk Management	There is no equivalent policy in the NP

6.0 EUROPEAN UNION OBLIGATIONS

- 6.1 The UBNP has been the subject of a Sustainability Appraisal (SA) incorporating the provisions of Strategic Environmental Assessment (SEA) required by European law. A SA Scoping Report was consulted on in June 2015 and August 2016 and submitted to the statutory environmental bodies (Historic England, Natural England and the Environment Agency) as well as Horsham District Council, West Sussex County Council and the South Downs National Park Authority.
- 6.2 A final Sustainability Appraisal report, together with a non-technical summary, is submitted in support of the UBNP.
- 6.3 Article 6 of the Habitats Directive (92/43/EEC) requires all Member States to undertake an 'appropriate assessment' of any plan or project requiring authorisation which would be likely to have a significant effect upon a European site (including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites; this is commonly referred to as a Habitats Regulations Assessment (HRA).
- 6.4 The South Downs National Park covers approximately 2/3 of the parish's land area, primarily consisting of a zone to the east of the A2037 road. There are 4 Sites of Special Scientific Interest, 1 site called Horton Clay Pit SSSI and 3 sites belonging to Beeding Hill to Newtimber Hill SSSI. There is one Local Nature Reserve called Tottington Wood Local Nature Reserve (LNR). The parish contains areas identified by Natural England as Priority Habitats and are subject to Habitat Action Plans. However, these locations do not fall under the category of 'European sites'²
- 6.5 The Habitats Regulations Assessment of the Horsham District Planning Framework 2014 states that '*While any location of Neighbourhood Plan in the District could in theory require a HRA it should be noted that the parishes of Pulborough, West Chiltington, Thakeham, Storrington and Sullington, are located in close proximity to the Arun Valley SAC/SPA/Ramsar site and/or water courses which flow into the site and these are likely to require especially close examination if any significant proposal was to arise through the Neighbourhood Plan or Small Sites Allocation*

² This includes Special Areas of Conservation (SACs) designated under the EU Habitats Directive (1992), Special Protection Areas (SPAs) designated under the EU Birds Directive (1979) and Ramsar Sites, designated under the Ramsar Convention.

process'. This does not relate to the parish of Upper Beeding. The South Downs National Park Local Plan Habitat Regulation Assessment 2018 provides the same information with regard to the key European sites located within the Horsham District and the wider Park Authority boundary.

- 6.6 **Appendix A** sets out the Habitats Regulation Assessment Screening undertaken by Horsham District Council (December 2018).

APPENDIX A

Habitat Regulations Assessment Screening

Habitat Regulations Assessment Screening

Neighbourhood Development Plans in Horsham District

Upper Beeding Neighbourhood Plan

December 2018

1.0 Introduction

- 1.1 In order to protect biodiversity at an international scale, European wide legislation³ has established a network of nature conservation sites which have been designated for their ecological importance. Sites that have been designated to conserve wild bird species are known as Special Protection Areas (SPAs); other habitats and species are protected through designations known as Special Areas of Conservation (SACs). In addition wetlands of worldwide importance for biodiversity have been designated as RAMSAR sites.
- 1.2 In order to ensure that there is no deterioration in the integrity of SPAs, SACs or RAMSAR (hereafter referred to as international sites) sites, legislation⁴ requires that when plans or programmes are being prepared, it is considered whether the effects arising from the plan could have a significant impact on the internationally designated sites. This process is known as Habitat Regulations Assessment. The process can be broken down into four stages set out in the table below:

Table 1: Stages of Habitat Regulation Assessment

Stage	Description
Stage 1: Screening	This stage considers whether a plan alone or in combination with other plans is likely to have a significant effect on an international site. If not the process stops at this stage. If impacts may arise than a more detailed 'Appropriate Assessment' is needed. It should be noted that the Habitat Regulation Assessment Process is based on the 'precautionary principle'. This means that where it is not certain whether or not a plan will have adverse impacts, the potential for adverse effects is assumed.
Stage 2: Appropriate Assessment	This process looks how a plan could be fine-tuned as it emerges to ensure that significant impacts to nature conservation sites are avoided . For example this could include changing the wording of a planning policy. If impacts can be avoided, stages three and four are not required
Stage 3: Assessment of Alternative Solutions	If a plan is found that it would have an adverse impact on the integrity of an international site, alternatives to the plan should be considered from the earliest possible stage.
Stage 4: Compensation Measures	If there are no alternatives to a plan, and it can be demonstrated that the plan is necessary for 'imperative reasons of overriding public interest' compensation

³ European Directive (92/43/EEC)

⁴ The Conservation of Habitats and Species (Amendment) Regulations 2012, SI2012 No. 1927

	measures to offset the adverse impacts are required. It is unlikely that a Local or Neighbourhood Plan would meet this test.
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- 1.3 Within Horsham District, a number of Neighbourhood Development Plans are being prepared. These plans will identify sites for housing and employment development and it must therefore be considered whether these plans will have any adverse impacts on any international site. This report therefore sets out the results of the Habitat Regulations Screening Assessment for the Neighbourhood Development Plans that are being prepared in Horsham District.

2.0 Background to Habitat Regulation Assessment in Horsham District

Higher level development Plans

- 2.1 Neighbourhood Development Plans do not exist in isolation, and instead sit within the wider national and district level framework for planning. The National Planning Policy Framework 2018 (NPPF) sets the broad social, environmental and economic policies in which development can take place. It has a presumption in favour of sustainable development, although paragraph 177 makes it clear this does not apply where development requiring appropriate assessment is being considered, planned or determined.
- 2.2 Within Horsham District, it is anticipated that the strategic policies against which planning proposals are considered is the Horsham District Planning Framework (HDPF) which was adopted on the 27 November 2015. The HDPF was subject to Habitats Regulation Assessment Screening and Appropriate Assessment (Table 1 - stage 1 and 2).
- 2.3 Neighbourhood Development Plans prepared in Horsham District to date have been written to be in conformity with strategic policies identified in the Horsham District Planning Framework. In terms of assessing whether Neighbourhood Plans will have any adverse impacts on an international site the starting point for this screening assessment has been the Habitat Regulation Assessment (April 2015) undertaken for the HDPF, **and this report should be read in conjunction with that document.** This assessment considers the impact of strategic development and the general requirement for at least 1,500 homes to be identified and delivered through Neighbourhood Development Plans across the district, in cumulation with other District level plans.

Horsham District Council Habitats Regulation Assessment April 2015

2.4 The Habitat Regulations Assessment of the HDPF identified two key international sites which could be impacted by development of the quantum identified in the HDPF. These sites and their reason for designation are set out in table 2 below.

Table 2 – International Sites

Name of site	approx. distance (km) from Horsham DC boundary	Reason for designation
Arun Valley SPA/Ramsar	inside HDC boundary (but within South Downs National Park)	Internationally important wintering population of Bewick swan. Additionally the SPA qualifies as over winter the area regularly supports 27,241 individual waterfowl (5 year peak mean for 1992/93 to 1996/97).
Arun Valley SAC	inside HDC boundary (but within South Downs National Park)	Ramshorn snail (<i>Anisus vorticulus</i>) for which this is considered to be one of the best areas in the United Kingdom.
The Mens SAC	2 straight line 3.5 by road	Extensive area of mature beech woodland rich in lichens, bryophytes, fungi and saproxylic invertebrates. One of the largest tracts of Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range. Also supports Barbastelle bats.

2.5 As part of the screening of the HDPF, it was considered whether other international sites within 20km of the HDC boundary could be affected by development in Horsham district. Taking into account the reasons for the designation of these sites, it was concluded that development of land within Horsham district, which includes sites in neighbourhood plans, was too distant to have any impact on their integrity and they were screened out of any further assessment. These sites were therefore screened out of the need for further Appropriate Assessment (Table 1 stage 2) of NDPs during the initial Appropriate Assessment Screening. It was however recognised that further screening may be appropriate in the future as part of the Local Plan Review.

2.6 Since the initial Screening was undertaken, Wealden District Council have objected to some planning applications in Horsham District on the basis that the traffic increases generated by these developments may, in combination with other development in the south east, have an adverse impact on the Ashdown Forest. It is therefore appropriate to revisit the screening assessment to consider whether the proposed housing in the Upper Beeding Neighbourhood Development Plan (UBNDP) has any potential to impact on the Ashdown Forest in particular. It is not considered that other European sites that were screened out of the HDC Appropriate Assessment need to be revisited prior to the commencement of the Local Plan Review.

Ashdown Forest

Name of site	approx. distance (km) from Upper Beeding boundary	Reason for designation
Ashdown Forest SAC	Approx 51.5KM at the closest point to A275 / A22 Junction	European dry Heaths – for which this is considered to be one of the best areas in the UK together with North Atlantic Wet Heaths with <i>Erica tetralix</i> for which this is considered to be one of the best areas on the UK. The site also supports a significant presence of great crested newts although this is not a primary reason for designation

2.7 Some of Ashdown Forest is also designated as a SPA due to the population of Dartford Warblers. This element remains screened out of the assessment as they are primarily at risk from disturbance when nesting, and the recreational pressure on the Ashdown Forest from a 40km distance is considered not to be sufficiently close to generate impacts. (This is currently accepted to be within a 7km radius).

2.8 A number of conservation objectives have been identified for the Ashdown Forest SAC to ensure the site achieves favourable conservation status for its qualifying features by maintaining or restoring:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;
- Supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
- The populations of qualifying species;
- The distribution of qualifying species within the site.

As of December 2018, the status of the SSSI (which includes the Ashdown Forest SAC) was as follows

% Favourable	% Unfavourable recovering	% Unfavourable no change	% Unfavourable declining	% Destroyed / part destroyed
20.31%	79.29%	0.00%	0.40%	0.00%

2.9 The key risk from development plans on the conservation objectives of the Ashdown Forest SAC is from atmospheric pollution. This is a widespread issue and includes transboundary sources over which the neighbourhood plan has no control. Local pollutant sources can affect designated sites, particularly in relation to protected habitats within SACs, and especially from road traffic emissions. Upper Beeding is some considerable distance from the Ashdown Forest, but road traffic emissions

depending on the scale, location and distribution of development, may (in combination with other plans) affect the way in which locally emitted pollutants reach the site.

2.10 Qualifying habitats most sensitive to air pollution within Ashdown Forest are European dry heaths and North Atlantic wet heaths. The main pollutant effects of interest are acid deposition and eutrophication by nitrogen deposition. Oxides of nitrogen (NOX) (or sulphur dioxide) reacting with rain/cloudwater to form nitric (or sulphuric) acid, and is caused primarily by energy generation, as well as road traffic and industrial combustion. Both wet and dry acid deposition have been implicated in the damage and destruction of vegetation (heather, mosses, liverworts and lichens are particularly susceptible to cell membrane damage due to excessive pollutant levels) and in the degradation of soils and watercourses (including acidification and reduced microbial activity).

2.11 The Horsham District Planning Framework already contains measures to seek to ensure that there are no adverse impacts on the Integrity of international sites. These will also apply to any applications for development in Upper Beeding Parish. In relation to air quality Policy 24 (Environment Protection) requires that development

“ minimises exposure to and emission of pollutants including ... air... and ensure that they....

“minimise air pollution and greenhouse gas emissions in order to protect human health and the environment”

Policy 40 – transport, also seeks to provide for a range of sustainable transport measures.

Although both these policies contain measures that will minimise impacts in relation to air quality, further screening has been undertaken in the context of the Upper Beeding Neighbourhood Development Plan and the potential for impacts to arise on the Ashdown Forest.

Arun Valley and the Mens

2.12 As both the Arun Valley and the Mens SPA had the potential to be adversely impacted by the plans and policies in the HDPF, an Appropriate Assessment of the HDPF was undertaken. This assessment process resulted in suggested changes to the HDPF after which it was concluded that the HDPF (alone or in combination with other plans) will not have an adverse impact on the European sites. The impacts and mitigation proposed are summarised in table 3.

Table 3 –Measures to avoid adverse impacts on the integrity of International Sites

Site potentially affected	Impact	Effect	Mitigation in the HDPF
Arun Valley SPA/SAC/Ramsar	Increased water demand from new housing.	Low river flows/ groundwater levels and consequent water availability issues in wetland sites.	HDPF Policy (38) Flooding – requires that water quality and availability is maintained.
	Increased water demand from new housing.	Water quality deterioration in wetland sites, especially eutrophication through high phosphorus levels.	Policy 37 38 24 – These policies require that there is no pollution of watercourses, groundwater accord with the WFD and provide necessary upgrades to e.g. sewage works before development can take place. Policy 37 also limits demand for water usage from new housing.
	Increased housing development causing faster run-off and higher flood peaks.	Heightened downstream flood risk in wetland sites, damaging vegetation through prolonged deep flooding in winter, while summer floods threaten invertebrates and make essential site management difficult or impossible.	Policy 35 and 38 Policies require that technically feasible solutions to reduce flood risk (and Suds) are incorporated into developments, and design measures are incorporated into developments to ensure water vulnerability is minimised.
The Mens SAC	Housing development.	Disrupted flight paths and feeding areas for bat populations present within sites.	Policy 25 and 31 –specific requirements that any development does not affect integrity of these sites and identifies a bat sustenance zone.

2.13 Although it was concluded that with mitigation the HDPF would not have any impact on international sites, it was also highlighted that, given that the precise number and

location of development to be brought forward through Neighbourhood Development Plans had not been finalised, there was therefore some potential for sites identified in NDPs to have additional impacts on the European sites that could not be identified as part of the higher level assessment undertaken for the HDPF. In particular, it was noted that the Parishes of Pulborough, West Chiltington, Thakeham, Storrington and Sullington, which are located in close proximity to the Arun Valley SAC/SPA/Ramsar site and/or water courses which flow into the site, are likely to require especially close examination if any significant proposal was to arise through the Neighbourhood Plan process.

3.0 Neighbourhood Development Planning in Horsham District

3.1 Horsham District now has over 80% coverage of Parishes or Neighbourhoods across the District progressing Neighbourhood Development Plans (NDP's). In total there are 23 Neighbourhood Plan areas across the District, some of which are clustered. Five Neighbourhood Plans (Nuthurst, Thakeham, Woodmancote, Slinfold and the Wineham and Shermanbury neighbourhood plans have been "made" and the remainder are at various stages of preparation. These NDP areas were subject to a Habitats Regulation Assessment Screening during their plan preparation, and it was concluded that their plans would not have any adverse impacts on any international site. The remaining designated parishes have not yet been subject to screening. Each neighbourhood development plan will be examined on its own merits (in combination with any other plans or development) as set out in part two of this report.

3.2 All neighbourhood Development Plans that are prepared must be in general conformity with the Council's Local Plan. Where a NDP is silent on an issue, the policies in a Council's Local Plan (in this case the HDPF) apply. As stated in paragraph 2.3, the Neighbourhood Development plans that have been prepared to date have been written to be in conformity with both the HDPF.

3.3 In screening the emerging NDPs the following issues will be considered:

1. Do any of the proposed policies increase quantum of development beyond 1500 homes which are due to be delivered through Neighbourhood Planning? If this is the case, are there additional impacts arising from additional sites not assessed in the Appropriate Assessment of the HDPF?
2. Will the development locations on the plan have any direct or indirect impacts on the Arun Valley SAC/SPA/RAMSAR or the Mens SAC or the Ashdown Forest SAC that cannot be avoided by the application of the policies in the HDPF?
3. Are there any additional policies within the plan which could impact alter the mitigation measures set out in the Council's HDPF?
4. Do any of the above apply in combination with other plans or programmes?

PART TWO – SCREENING ASSESSMENTS FOR NDPs in HORSHAM DISTRICT

Table 4 below sets out a summary of the screening assessments undertaken for NDPs in Horsham District, and the date that this assessment was undertaken. The detailed assessments are set out on the following pages.

NDP Area	Plan Status	HRA Screening Outcome	Date of screening
Ashington Parish	Progressing to reg 14 consultation	Awaiting Screening	
Ashurst Parish	Not designated	N/A	
Billingshurst Parish	Progressing to reg 14 consultation	Awaiting Screening	
Bramber Parish	Progressing to reg 14 consultation	Awaiting Screening	
Broadbridge Heath	Not designated	N/A	
Colgate	Not designated	N/A	
Cowfold	Progressing to reg 14 consultation	Awaiting Screening	
Henfield Parish	Progressing to reg 14 consultation	Awaiting Screening	
Horsham Blueprint	Progressing to reg 14 consultation	Awaiting Screening	
Itchingfield Parish	Progressing to reg 14 consultation	Awaiting Screening	
Lower Beeding	Progressing to reg 14 consultation	Awaiting Screening	
North Horsham	Withdrawn from NP	n/a	
Nuthurst Parish	Plan Made October 2015. Land identified for max 51 homes	Appropriate Assessment not required	May 2014
Pulborough Parish	Awaiting Screening	Preliminary screening November 2015. Update necessary to take account of more recent plans which have now been made.	
Rudgwick	Progressing to reg 14 consultation	Awaiting Screening	
Rusper	Progressing to reg 14 consultation	Awaiting Screening	
Shermanbury Parish	Plan made June 2017. Land allocated for max 20 homes	Appropriate Assessment not required	August 2016
Shipley Parish	Progressing to reg 14 consultation	Awaiting Screening	
Slinfold Parish	Examination complete - Proposal for up to 74 homes	Appropriate Assessment not required following updated screening– see below	1) June 2017 2) February 2018 (update)
Southwater Parish	Regulation 14 consultation completed.	Awaiting Screening	

NDP Area	Plan Status	HRA Screening Outcome	Date of screening
Steyning,	Not designated	N/A	
Storrington Sullington and Washington	Examination concluded. Examiner has requested rescreening following additional allocation of land for residential development.	Appropriate Assessment not required following updated screening	February 2018 Updated Screening December 2018
Thakeham	Plan made April 2017 – Land allocated for 50 homes	Appropriate Assessment not required	October 2015
Upper Beeding Parish	Progressing to Reg 16 consultation	Appropriate Assessment not required following screening.	Dec 2018
Warnham Parish	Examination Nov 18	Appropriate Assessment not required following screening.	Nov 2018
West Chiltington Parish	Regulation 14 consultation ongoing	Awaiting Screening	
West Grinstead Parish	Progressing to reg 14 consultation	Awaiting Screening	
Woodmancote Parish	Plan to be made June 2017. No land allocated for housing development.	Appropriate Assessment not required	January 2016

Upper Beeding Neighbourhood Plan

- 1. Do any of the proposed policies increase quantum of development beyond 1500 homes? If this is the case, then what are the additional impacts of additional numbers not assessed in the Appropriate Assessment of the HDPF?**

This NDP will identify land for approximately 109 homes. Cumulatively, the following 'made' neighbourhood plans: Slinfold, Nuthurst, Thakeham, Wineham and Shermanbury, allocate land for 198 homes. In addition, Warnham has undergone a HRA screening with the plan identifying land for 50 units whilst the Storrington, Sullington and Washington Neighbourhood Plan (SSWNP) was required to undertake a further rescreening following the inclusion of additional housing allocation (minimum 60 dwellings) at Land north of Downsview Avenue following examination equating to 146 dwellings in total to be delivered from the SSWNP. Overall the total number of dwellings have been identified to be delivered through neighbourhood planning equates to a total of approximately 503 homes. The overall quantum of development is therefore within that assessed in the HRA of the HDPF and no additional impacts will arise in this respect. The potential impact of the additional homes in HDC including in Upper Beeding Parish is set out in more detail in response to question 4, as any impacts will be in combination with other plans and programmes.

- 2. Will the development locations on the plan have any direct or indirect impacts on the Arun Valley SAC/SPA/RAMSAR, the Mens SAC or the Ashdown Forest SAC that cannot be avoided by the application of the policies in the HDPF?**

The development sites identified in this plan are not within the Arun Valley or the Mens Woodland. The river Arun and some of its tributaries flow through the Parish, but there are no sites that have been identified for development which are on or near these watercourses. It is therefore considered that there are no additional impacts arising from this development that would not have been identified and mitigated by the policies in the Horsham District Planning Framework. If the Neighbourhood Plan is 'made' the HDPF policies will still be relevant as part of any planning application and ensures there is no adverse impact on this European site.

There are no additional impacts arising from the Neighbourhood Plan that would not be covered by the existing policy framework. It is not considered that the sites are sufficiently close to the Arun Valley SPA to have any additional direct or indirect impacts on these sites. If the Upper Beeding Neighbourhood Plan is made, the development sites will also need to accord with the provisions of the HDPF policies, which avoids any adverse impact on the two European sites.

In terms of the Ashdown Forest SAC there are policies in the HDPF which seek to minimise air quality impacts and encourage sustainable transport solutions. This cannot however entirely rule out the potential that new development in Upper Beeding area could generate additional car journeys which may include trips through the Ashdown Forest and therefore contribute to nitrogen deposition in this area. The more detailed assessment of this is set out in response to question 4 as any impact that arose would be in combination with a range of other plans and programmes.

3. Are there any additional policies within the plan which could impact alter the mitigation measures set out in the Council's HDPF?

This plan does not propose any policies which conflict with the requirements of the HDPF policies as set out in Table 3.

4. Do any of the above apply in combination with other plans or programmes?

- a) Question 1 considers the total level of development in combination with all neighbourhood development plans that have reached Regulation 16 stage consultation in Horsham District. In addition Local and Neighbourhood Plans are being prepared in adjoining authorities. The cumulative impact of these plans was considered as part of the HRA which was undertaken for the Horsham District Planning Framework. The total number of homes identified for each District includes homes which will or have been delivered through Neighbourhood Planning.
- b) Upper Beeding Parish is located on the southern boundary of Horsham District and adjoins Fulking Parish located in the South Downs National Park and Neighbourhood Forum Shoreham Beach to the south both of which are at Pre Regulation 14 stage. Given the constraints of the National Park and Shoreham Beach, the overall level of development will however be low for both parishes, and any impact is unlikely to have any additional significant impact. Upper Beeding Parish also abuts Henfield Parish, Steyning Parish, Bramber Parish and Woodmancote Parish. Only Woodmancote has a made neighbourhood plan and is not promoting any significant level of development while the other parishes have yet to reach Regulation 14 stage.
- c) It has been recognised that development in Upper Beeding Parish, could in combination with other development have an adverse impact on the Ashdown Forest as a result of increased vehicle movements through the area. An initial screening has therefore been undertaken to consider whether there is a chance that development in the parish could (in combination with other development) have an impact on the integrity of the Ashdown Forest SAC.
- d) The potential air quality impacts on the Ashdown Forest SAC arise from additional nitrogen deposition resulting from increased traffic emissions as a consequence of new development. Major roads which pass through Ashdown Forest and on which there is the potential that residents from Upper Beeding Parish could potentially use are the A22, A26 and A275, B2188, B2026, B2110 and Coleman's Hatch Road. If none of the roads in the network experience an increase in traffic as a result then the air pollution impact of the scheme is considered not to be significant and no further work is needed.
- e) In March 2017, the High Court handed down a judgment in relation to nitrogen deposition on the Ashdown Forest SAC. Wealden District Council brought a legal challenge against the Joint Core Strategy prepared by Lewes District Council and the South Downs National Park Authority. The legal challenge centred on the assessment of air quality impact on the Ashdown Forest SAC which was based on advice provided by Natural England. The Wealden judgment found that the advice provided by Natural England on the in combination assessment was flawed and the outcome was that the judge quashed part of the Joint Core Strategy.
- f) Natural England had advised that the Design Manual for Roads and Bridges could be used to assess air quality impacts, applying the 1,000 Annual Average Daily Traffic methodology. It was advised that if the development proposals in a Plan by itself were calculated to be below 1,000 AADT, then the air pollution impacts could be considered not significant and no further work would be needed.

- g) The judge found that the advice provided by Natural England was erroneous and that an assessment of air quality impact should include other development proposals thus considering the in combination effect of nitrogen deposition from increased traffic. However, the judge gave no ruling as to the practical effects of the judgment. The parameters for any assessment of traffic impact are now unclear beyond a general presumption that any development that is likely to lead to air quality impacts on the Ashdown Forest SAC in the form of additional traffic will need to be considered through a Habitats Regulations Assessment.
- h) The starting point for establishing whether there are likely to be any impacts from the Upper Beeding Neighbourhood Plan has been to consider existing travel patterns which are known for these parishes. The Council has therefore used the travel to work patterns from the 2011 census as this is readily available data that exists at a Parish level that would provide an understanding of travel movements.
- i) The travel to work data shows the total number of journeys to work from each parish, together with the district or borough in which the journey ended. Commuting patterns are likely to be a worst case scenario as other trips made to access services and facilities are much shorter. The number of trips set out below does not make a breakdown of whether they were made by public transport or vehicle. However, it is likely that trips to Wealden District would be by car given the lack of any direct public transport route.
- j) The table below shows the number of journeys to work in 2011 and a summary of whether they were within or beyond Horsham District. This is broken down further to provide the percentage and number of trips which were made to a destination in Wealden.

Trips from Horsham District Council as a whole

Destination of trip	Number of journeys	Percentage of total journeys
All trips	50349	100%
Horsham District	24413	48%
Outside Horsham District	25936	52%
Wealden District	154	0.3%

Trips from Upper Beeding Parish

Destination of trip	Number of journeys	Percentage of total journeys
All trips	1455	100.0%
Horsham District	503	34.6%
Outside Horsham District	944	64.9%
Wealden District	8	0.5%

- k) This table shows that there were 8 journeys to Wealden district from Upper Beeding Parish at the time of the 2011 census (0.5% of the total). Given that the parish is around 50km away the number of trips would be expected to be extremely low, and this helps confirm that there is little if any relationship to the parish with Wealden District. It is however recognised that additional development will generate additional car journeys from the village and it needs to be considered whether any could extend into Wealden and therefore risk impacting Ashdown Forest.

- l) There are 109 homes proposed in the Upper Beeding Neighbourhood Plan which may have the potential to further increase the population size of the parish. Using the average household size for Horsham District of 2.39 people, the increase in population resulting from this development will be around 260 individuals. It is not expected that all new residents will be economically active – some will be children, and others retired, and as a result these individuals will not be undertaking commuting journeys. At the 2011 census 55.2% of residents were aged 16-65 and most likely to be economically active. This equates to around 143 residents.
- m) Using these figures 0.5% of 143 trips equates to less than one additional car journey to Wealden District. This is however trips to the district and are not necessarily trips through Ashdown Forest which is some distance from the main employment locations of Uckfield and Hailsham, both of which are more likely to be employment destinations for residents of the Upper Beeding area. The total number of trips is therefore likely to be lower than this figure. It is therefore not considered that these development proposals will generate any journeys that either individually or cumulatively with other trips will increase traffic movements above 1000 AADT.

Conclusion

On the basis of the above it is not considered that an Appropriate Assessment of the Upper Beeding Neighbourhood Plan is required. It may however be helpful for the Parish Council cross refer to the relevant HDPF policies to further strengthen the mitigation for the Arun Valley SPA and the Mens Woodland SPA.

It is also suggested that a further modification is made to the plan to ensure that any future development proposals area make a reconsideration as to whether the proposal may impact on the Ashdown Forest as follows:

“Any development with the potential to impact, either individually or in combination, the integrity of any SPA or SAC will be required to undertake a Habitat Regulations Assessment including an Appropriate Assessment if required”