



# **UPPER BEEDING NEIGHBOURHOOD PLAN**

**Upper Beeding Parish Council**

## **SUSTAINABILITY APPRAISAL INCLUDING THE STRATEGIC ENVIRONMENTAL ASSESSMENT**

**NON-TECHNICAL SUMMARY**

**Submission Version**

**December 2018**

# **1 INTRODUCTION AND BACKGROUND**

- 1.1 This report forms the Non-Technical Summary (NTS) to the Submission Sustainability Appraisal (SA) of the Submission Upper Beeding Neighbourhood Plan (UBNP). A neighbourhood plan, once adopted, becomes a formal part of the planning system and will be a Local Development Plan document. The UBNP is an important planning tool for shaping the development and growth of the parish.

## **What is a Sustainability Appraisal?**

- 1.2 A Strategic Environmental Assessment (SEA) is a requirement of the EC Directive 2001/42/EC (the 'Directive') on the assessment of the effects of certain plans and programmes on the environment.
- 1.3 A Sustainability Appraisal (SA) is conducted in conformity with the SEA Directive. However, while an SEA is concerned with environmental effects, the SA is an iterative process that considers the environmental, social and economic consequences of a plan and its policies and seeks to identify ways of achieving a proper balance between these three considerations. For simplification, this report is referred to as the Sustainability Appraisal throughout.
- 1.4 The Upper Beeding Neighbourhood Plan must be in conformity with higher level planning policy, primarily the Horsham District Planning Framework 2015 (HDPF), but it is also important to ensure conformity with the Submission South Downs Local Plan 2018 prepared by the South Downs National Park Authority (SDNPA). These documents have been subject to their own sustainability appraisal (incorporating a strategic environmental assessment) and this report has been informed by information contained within those assessments.

## **What is Sustainable Development?**

- 1.5 Sustainable development is defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". It is about ensuring better quality of life for everyone, now and for generations to come. In doing so, social, environmental and economic issues and challenges should be considered in an integrated and balanced way.

1.6 The National Planning Policy Framework (NPPF) 2018 states the Government’s intentions with regards to sustainable development, in particular the need for the planning system to perform a number of roles:

- a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

## 2. APPRAISAL METHODOLOGY

2.1 The appraisal methodology has been prepared taking into account the processes set out in the relevant guidance<sup>1</sup>.

2.2 The diagram below describes the different stages in the SA process and how they relate to the stages in the Plan production.

| STAGE    | TASKS  | COMPLETED  |
|----------|--|--|
| <b>A</b> | <b>Setting the context and objectives, establishing the baseline and deciding on the scope</b> <ul style="list-style-type: none"> <li>• Identifying other relevant plans and programmes</li> <li>• Collecting baseline information</li> <li>• Identifying problems</li> <li>• Developing objectives and the Sustainability Framework</li> </ul>          | Sustainability Framework determined and set out in the Scoping Report. Baseline and Framework updated following feedback and comments. |
| <b>B</b> | <b>Developing the alternatives and assessing effects</b> <ul style="list-style-type: none"> <li>• Testing the plan objectives against SA/SEA objectives</li> <li>• Developing alternatives</li> <li>• Testing policy options against the SA/SEA objectives</li> <li>• Considering mitigation</li> <li>• Proposing measures to monitor effects</li> </ul> | Plan objectives, strategy and policies, plus all reasonable alternatives at this stage are set out and appraised within this SA.       |
| <b>C</b> | <b>Prepare the Sustainability Appraisal Report</b>   | This document forms the first stage of Stage C   |

<sup>1</sup> Sustainability Appraisal guidance within the DCLG Plan making Manual/SEA guidance from ODPM A Practical Guide to the Strategic Environmental Assessment Directive 2005

|          |   |  |
|----------|---|--|
| <b>D</b> | <b>Consult on the SA Report</b>           | Consultation undertaken on Pre-Submission SA June – August 2018. Consultation will be undertaken for the Submission version. |
| <b>E</b> | <b>Monitor implementation of the plan</b> | To be completed  |

2.3 The main objective of appraising policy options is to highlight the different advantages and disadvantages of each option, with the aim of indicating that the preferred option is the most sustainable one. Symbols are used to record the performance of each option against each objective in the sustainability framework.

### 3. SUSTAINABILITY ISSUES

3.1 As part of the Sustainability Appraisal it is necessary to identify the key sustainability issues facing the parish. These have been informed through the following sources:

- A review of the policies outlined in the Horsham District Planning Framework.
- A review of the policies of the Submission South Downs National Park Local Plan
- Collection and analysis of baseline data.
- Feedback from local community and consultation events to date.
- The Focus Groups SWOT results.

### 4. SUSTAINABILITY FRAMEWORK - OBJECTIVES

4.1 In order to assess the contribution the Submission Neighbourhood Plan will make towards achieving sustainable development, a range of sustainability objectives have been developed. These are based on social, economic and environmental objectives and each is quantified by a number of indicators. The objectives and indicators make up the sustainability framework.

|  |  |               |
|--|--|---------------|
| <b>Objective 1<br/>Housing</b>                   | To provide high quality market and affordable housing with a range of size, types and tenures appropriate to local needs:<br><br>1a - will the UBNP improve the availability of decent, affordable housing?<br>1b – will the UBNP provide a range of housing types of various sizes and tenures?<br>1c – will the UBNP make better use of brownfield land for housing? | <b>SOCIAL</b> |
| <b>Objective 2:<br/>Community<br/>Facilities</b> | To ensure everyone has access to appropriate and affordable community, educational and leisure facilities:<br><br>2a - Will the UBNP sustain or increase the provision of community facilities?<br>2b – Will the UBNP maintain and improve existing educational and leisure facilities?  | <b>SOCIAL</b> |

|                                       |  |                      |
|---------------------------------------|--|----------------------|
| <b>Objective 3:<br/>Biodiversity</b>  | <p>To protect and enhance the quality and level of biodiversity and natural habitats within the parish and provide new green infrastructure and access to green and nature areas.</p> <p>3a - Will the UBNP lead to the loss to biodiversity, flora or fauna as a result of development, either directly or through habitat fragmentation?<br/> 3b – Will the UBNP seek to include measures to improve biodiversity and links to nature /green space as part of any proposed development?<br/> 3c - Will the UBNP avoid impacts on, and where possible improve, the quality and extent of existing recreational assets, such as natural open spaces and formal and informal footpaths?</p> | <b>ENVIRONMENTAL</b> |
| <b>Objective 4:<br/>Landscape</b>     | <p>To conserve and enhance the quality of landscape and townscape character in the parish:</p> <p>4a - Will the UBNP result in a deterioration of the quality of the landscape or village-scape?</p>   | <b>ENVIRONMENTAL</b> |
| <b>Objective 5:<br/>Heritage</b>      | <p>To conserve and enhance the quality and distinctiveness of the historical environment of the parish:</p> <p>5a - Will the UBNP protect and enhance designated features of historical or cultural interest (e.g. Listed buildings, archaeological sites, ancient monuments, the Conservation Area?)<br/> 5b – Will the UBNP sustain and enhance the settings and views of heritage assets?</p>   | <b>ENVIRONMENTAL</b> |
| <b>Objective 6:<br/>Flooding</b>      | <p>To ensure that development does not increase the risk of flooding.</p> <p>6a - Does the UBNP minimise or aim to mitigate the risk of flooding?<br/> 6b - Will the UBNP ensure removal of surface water by sustainable methods that will enhance the environment and biodiversity?</p>   | <b>ENVIRONMENTAL</b> |
| <b>Objective 7:<br/>Accessibility</b> | <p>To ensure new development does not increase on-street parking along the narrow roads and lanes and improves facilities for pedestrians.</p> <p>7a – will the UBNP support new or improved pavements, crossings, signage and public realm areas?<br/> 7b – Will the UBNP ensure that all new development has adequate on-site parking provision?</p>   | <b>ENVIRONMENTAL</b> |
| <b>Objective 8<br/>Businesses</b>     | <p>Support the growth of local businesses to meet the needs of the parish.</p> <p>Will the UBNP support existing shops and businesses?<br/> Will the UBNP provide potential for new businesses within the parish?</p>  | <b>ECONOMIC</b>      |

4.2 The Submission Neighbourhood Plan sets out a number of strategic objectives. These state what the Neighbourhood Plan is aiming to achieve through its overall strategy and policies. An assessment has been made as to whether the 8 Neighbourhood Plan objectives are consistent with the 8 objectives of the sustainability appraisal. This exercise helps identify where potential areas of conflict lie and where mitigation may be required.

## 5 POLICY APPROACHES AND OPTIONS FOR SITE ALLOCATIONS

5.1 An important part of the SA process is the appraisal of different options for policy areas to help identify the most sustainable approaches to be taken forward in the Neighbourhood Plan. For some of the policy areas, a number of different potential approaches were

developed and appraised against the sustainability framework to identify the preferred approaches. Although it is necessary to consider alternatives to a plan, only those that are feasible and realistic (i.e. are reasonable) should be included in any assessment.

- 5.2 The Sustainability Appraisal will consider a number of approaches and options in order to guide the spatial strategy of the Neighbourhood Plan. The Parish Council also considered a number of general issues where options were not identified but where broad approaches for consideration and discussion have been included in this SA. These issues, where no alternative approaches have been proposed include:

*What approach should the Neighbourhood Plan adopt to best meet local housing need?*

*How best should the Neighbourhood Plan ensure a 'sufficient' supply of housing?*

*Should the Neighbourhood Plan safeguard employment sites?*

*Should the Neighbourhood Plan prioritise derelict, redundant and brownfield land?*

- 5.3 In respect of housing sites, the Parish Council presented a discussion of 3 'issues' for focus. Each Issue has been considered against a number of options set against the Sustainability Objectives with each option ranked according to preference (1-3), with 1 being the most preferred option. The Issues and options are as follows:

#### **Issue A – How should development be located with the parish?**

Option A1: Spread development across the parish to include within settlements, adjacent to settlements and the countryside.

Option A2: Spread development within or adjacent existing settlements in the parish either evenly per settlement or proportionally according to the size of the settlement.

Option A3: Locate development within existing settlement boundaries only either evenly per settlement or proportionally according to the size of the settlement.

#### **Issue B - What approach should the Neighbourhood Development Plan adopt towards the number and size of development sites?**

Option B1: The Neighbourhood Development Plan's approach is to allocate a range of separate sites both large (over 10 units for residential) and small (10 units and under).

Option B2: The Neighbourhood Development Plan's approach is to allocate a range of separate smaller sites (10 units and under).

Option B3: The Neighbourhood Development Plan's approach is to allow all development to be delivered in one large strategic allocation (over 30 units).

#### **Issue C – How much new housing should be provided over the plan period?**

Option C1: The Neighbourhood Development Plan's approach should provide for up to 213 new dwellings in accordance with the results of the housing needs survey.

Option C2: The Neighbourhood Development Plan's approach should be to not allocate any sites for new housing.

- 5.4 A number of sites have been put forward through the call for sites exercise other sites that have been identified by the community. In total 19 sites were submitted to the Parish Council during the call for sites exercise. The Parish Council instructed AECOM consultants in 2017 to carry out a full site assessment. The results of this work have been fed into the Neighbourhood Plan and the SA.
- 5.5 A Sequential Test has been prepared to assess the flood risk of all sites within the parish that have been considered for potential development in the Neighbourhood Plan and this should be read in conjunction with the SA/SEA.

## 6 APPRAISING THE NEIGHBOURHOOD PLAN POLICIES

- 6.1 A wide range of policy areas have been included within the Submission Neighbourhood Plan. These will be appraised as to whether they have a positive or negative impact on the future of the parish, using the Sustainability Framework to undertake the evaluation.
- 6.2 All policies have been appraised in order to assess their impact against the 8 sustainability objectives. These are set out below. This exercise ensures that the policies within the Neighbourhood Plan are the most sustainable, given all the reasonable alternatives. Colours and symbols have been used. This relates to the level of positive or negative impact any development would have on the sustainability objectives.

|    |   |
|----|---|
| ++ | Greater positive impact on the sustainability objective                     |
| +  | Possible positive or slight positive impact on the sustainability objective |
| -  | No impact or neutral impact on the sustainability objective                 |
| ?  | Possible negative or slight negative impact on the sustainability objective |
| ?? | Greater negative impact on the sustainability objective                     |

- 6.3 Whilst it is predicted that many of the policies will have an overall positive or neutral/unknown impact, it is inevitable that some of the options appraised will present negative sustainability impacts. This will be mostly in cases where the sustainability objectives are not compatible with one another. Where negative impacts are predicted to arise, mitigation has been suggested.

6.4 Tables Aa to Ak set out all of the policies as now included in the Submission UBNP and a number of reasonable alternatives (options) for each.



**Table Aa Policy 1: Spatial Plan for the Parish**

| Policy 1 Options | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|------------------|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
| A                | ++            | ++                         | ++                 | ++              | ++                    | -              | +                   | +              |
| B                | ?             | ?                          | ?                  | ?               | ?                     | ?              | ?                   | ?              |
| C                | ??            | -                          | ?                  | ?               | ?                     | ?              | -                   | -              |

Option A – To have a policy that sets out when and where development will be acceptable, taking into account areas of landscape value, open space and other important parish assets. (final policy).  
 Option B – To have a spatial policy that provides no guidance on whether development is acceptable within/adjacent or some distance from settlement boundaries.  
 Option C – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.

**Preferred option A**

**Table Ab Policy 2: Housing Allocations**

| Policy 2 Options | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|------------------|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
|                  | +             | -                          | -                  | -               | -                     | -              | -                   |                |

There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a slight positive impact on SO1 rather than a greater one as the provision of 109 dwellings does not achieve the housing need number as evidenced in the AECOM Housing Need Study report. There is a neutral impact on the other objectives as these aren't referenced in the policy.

**Recommend: To agree this is a policy that supports the sustainable objectives.**

**Table Ac Policy 3: Land east of Pound Lane, Upper Beeding**

| Policy 3 Options   | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|--|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
|  | ++            | -                          | ++                 | ++              | ++                    | ++             | ++                  | -              |
| <p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a greater positive impact on most of the objectives although it has a neutral impact on SO2 and SO8.</p> <p><b>Recommend: To agree this is a policy that supports the sustainable objectives.</b></p> |               |                            |                    |                 |                       |                |                     |                |

**Table Ad Policy 4: Land at southern end, Oxcroft Farm, Small Dole**

| Policy 4 Options  | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|---|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
|   | ++            | -                          | ++                 | ++              | -                     | -              | ++                  | -              |
| <p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a greater positive impact on most of the objectives although it has a neutral impact on SO2 and SO5. Further details have been included within the supporting text regarding the existing business on the site.</p> <p><b>Recommend: To agree this is a policy that supports the sustainable objectives.</b></p> |               |                            |                    |                 |                       |                |                     |                |

**Table Ae Policy 5: Land at Greenfields, Henfield Road, Upper Beeding**

| Policy 5 Options  | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|---|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
|   | ++            | -                          | ++                 | ++              | ++                    | ++             | ++                  | ++             |
| <p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a greater positive impact on most of the objectives although it has a neutral impact on SO2. Whilst the development of the site does result in the loss of an employment site, this matter is addressed within the policy therefore it scores as having a positive impact on SO8.</p> <p><b>Recommend: To agree this is a policy that supports the sustainable objectives.</b></p> |               |                            |                    |                 |                       |                |                     |                |

**Table Af Policy 6: Riverside Caravan Park, Upper Beeding**

| Policy 6 Options   | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|--|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
|  | ++            | -                          | ++                 | ++              | ++                    | ++             | ++                  | -              |
| <p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a greater positive impact on most of the objectives although it has a neutral impact on SO2 and SO8. Whilst the site is an existing caravan park business, it is understood that part of this will remain.</p> <p><b>Recommend: To agree this is a policy that supports the sustainable objectives.</b></p> |               |                            |                    |                 |                       |                |                     |                |

**Table Ag Policy 7: Further Care Home Provision at Valerie Manor, Henfield Road, Upper Beeding**

| Policy 7 Options | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|------------------|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
| A                | ++            | -                          | ++                 | ++              | ++                    | +              | -                   | ++             |
| B                | ??            | -                          | -                  | -               | -                     | -              | -                   | -              |

Option A – To have a policy that sets out an appropriate location for the provision of care home facilities within the parish (final policy).  
Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.

**Preferred option A.**

**Table Ah Policy 8: Design Standards for New Development**

| Policy 8 Options | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|------------------|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
| A                | -             | -                          | ++                 | ++              | ++                    | ++             | -                   | -              |
| B                | -             | -                          | +                  | +               | +                     | +              | -                   | -              |

Option A – To have a policy that sets out when development will be permitted in terms of design principles (final policy).  
Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.

**Preferred option A.**

**Table Ai Policy 9: Community Facilities**

| Policy 9 Options | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|------------------|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
| A                | -             | ++                         | -                  | -               | -                     | -              | -                   | -              |
| B                | -             | -                          | -                  | -               | -                     | -              | -                   | -              |

Option A – To have a policy that sets out when development will be permitted in terms of design principles (final policy).  
Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.

**Preferred option A**

**Table Aj Policy 10 Employment Sites and Supporting Businesses**

| Policy 10 Options | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|-------------------|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
| A                 | -             | -                          | -                  | +               | +                     | +              | +                   | ++             |
| B                 | -             | -                          | -                  | -               | -                     | -              | -                   | +              |

Option A – To have a policy that focuses on supporting businesses and employment sites (final policy).  
Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.

**Preferred option A**

**Table Ak Policy 11 Local Green Spaces**

| Policy 11 Options | Obj 1 Housing | Obj 2 Community Facilities | Obj 3 Biodiversity | Obj 4 Landscape | Obj 5 Heritage Assets | Obj 6 Flooding | Obj 7 Accessibility | Obj 8 Business |
|-------------------|---------------|----------------------------|--------------------|-----------------|-----------------------|----------------|---------------------|----------------|
| <b>A</b>          | -             | ++                         | ++                 | +               | -                     | -              | -                   | -              |
| <b>B</b>          | -             | ?                          | ?                  | ?               | +                     | +              | +                   | +              |

Option A - To have a policy that sets out the sites to be allocated as local green spaces (final policy).  
Option B – To not have a policy and rely on the National Planning Policy Framework regarding advice on Local Green Spaces.

**Preferred option A**