

Bramber Neighbourhood Plan 2018 to 2033



Basic Conditions Statement

Presented by Bramber Parish Council

January 2020

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1 Introduction

- 1.1 This Basic Conditions Statement has been produced to accompany the Bramber Neighbourhood Plan ('the Neighbourhood Plan').
- 1.2 The relevant legal framework for the preparation and making of neighbourhood plans is supported by the Localism Act 2011 and the Neighbourhood Planning Act 2017 and found in the:
- Town and Country Planning Act 1990: ss. 61F, 61I, 61M-P and Schedule 4B
 - Planning and Compulsory Purchase Act 2004: ss 38A-C
 - Neighbourhood Planning (General) Regulations 2012 (2012 No.637) (as amended)
- 1.3 Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990 requires a neighbourhood plan to meet five¹ basic conditions before it can proceed to a referendum. These are:
- i. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - ii. The making of the neighbourhood development plan contributes to the achievement of sustainable development;
 - iii. The making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - iv. The making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations; and
 - v. Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The prescribed condition is that the 'making' of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats etc.) Regulations 2007) (either alone or in combination with other plans or projects).
- 1.4 This document sets out how the Plan meets the Basic Conditions.

Supporting documents and evidence

- 1.5 The Neighbourhood Plan and its policies is supported by a Consultation Statement, this Basic Conditions Statement, a Sustainability Statement and an extensive evidence base. It also contains a number of Non-Policy Actions, which are intended to contribute towards the achievement of the Plan's vision and proposes principles for the use of the Community Infrastructure Levy (CIL) and monies arising from other planning obligations. These Actions complement the Plan document but do not form part of the Development Plan.

¹ There are two further basic conditions which are relevant only to the making of a Neighbourhood Development Order and are therefore not considered in this document.

Key statements

- 1.6 Bramber Parish Council, as the qualifying body, has prepared the Plan, which covers the parish area of Bramber. Horsham District Council (HDC) designated a Neighbourhood Area for the whole of the Bramber parish area on 15 February 2018 and the SDNPA designated the part of the parish within the National Park on 26 February 2018.
- 1.7 The Plan sets out policies that relate to the development and use of land within only the Bramber Neighbourhood Area. This is shown in Figure 1 below.
- 1.8 The Plan refers only to the administrative boundary of Bramber. There are no other adopted Neighbourhood Development Plans that cover the Bramber Neighbourhood Area.
- 1.9 The Bramber Neighbourhood Plan Steering Group has prepared the Plan to establish a vision for the future of the parish. The community has set out how that vision will be realised through planning and controlling land use and development change over the plan period 2019 to 2031.
- 1.10 The Plan does not contain any policies which relate to excluded development as defined by section 61K of the Town and Country Planning Act 1990.

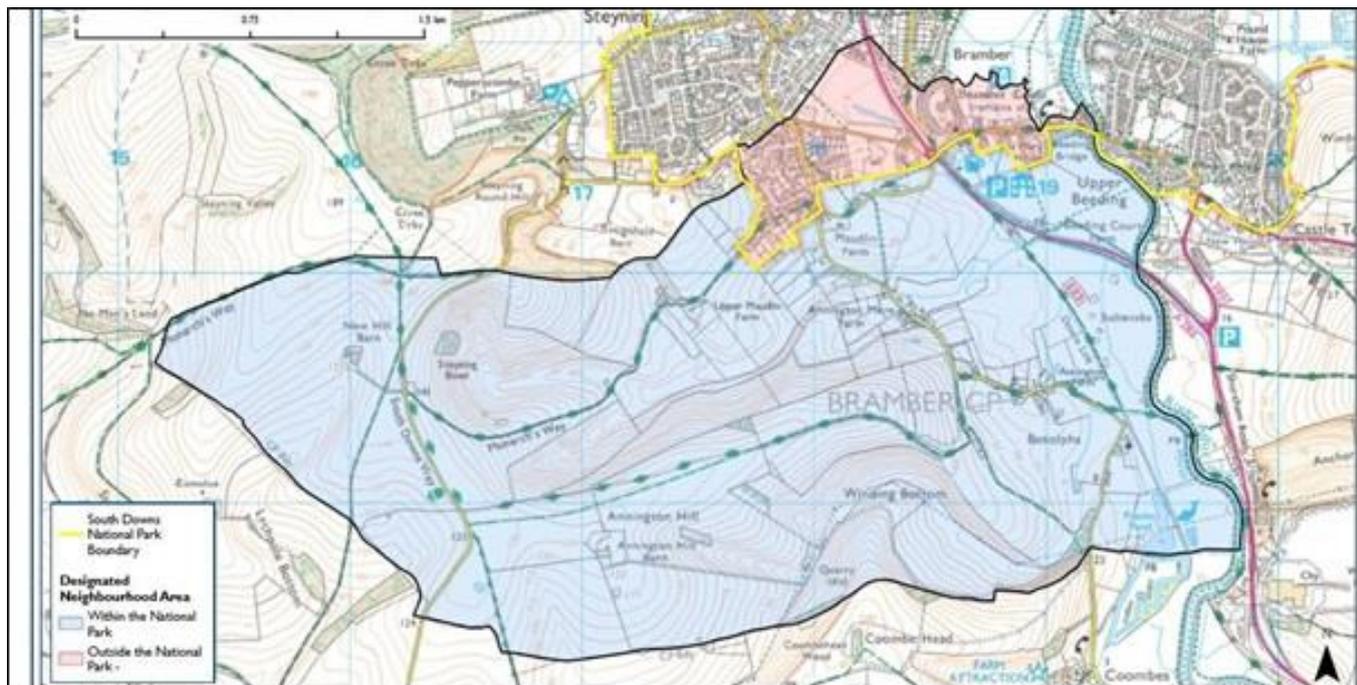


Figure 1: Bramber Neighbourhood Plan designated area

2 Basic condition (i) - conformity with national planning policy

- 2.1 To meet this condition, the Plan must be shown to have regard to national policies and advice contained in guidance issued by the Secretary of State. National policy and guidance is contained within the National Planning Policy Framework ('NPPF') and the Planning Practice Guidance ('PPG').

- 2.2 It should be noted that the Neighbourhood Plan has been prepared in accordance with the revised NPPF published in February 2019.

National Planning Policy Framework (2019)

- 2.3 The NPPF has 13 key objectives which are:
- Delivering a sufficient supply of homes
 - Building a strong, competitive economy
 - Ensuring the vitality of town centres
 - Promoting healthy and safe communities
 - Promoting sustainable transport
 - Supporting high quality communications
 - Making effective use of land
 - Achieving well-designed places
 - Protecting Green Belt land
 - Meeting the challenge of climate change, flooding and coastal change
 - Conserving and enhancing the natural environment
 - Conserving and enhancing the historic environment
 - Facilitating the sustainable use of minerals
- 2.4 This statement explains how the Bramber Neighbourhood Plan contributes to meeting these objectives, where relevant, and also notes the specific national policies that the Plan is intended to support and supplement.
- 2.5 The Neighbourhood Plan has nine principal objectives. These are summarised in Table 2.1 alongside the NPPF goals that each objective seeks to address.
- 2.6 Table 2.2 sets out each policy of the Plan alongside the policies in the NPPF that it has had regard to and analyses how each Plan policy contributes to achieving the key objectives of the NPPF.

Table 2.1: Assessment of the Plan objectives against NPPF goals

Plan objective	Relevant NPPF goal
Objective 1: Protect and enhance the rural character of the parish, the qualities of its landscape setting and its biodiversity, managing the impacts of any future growth in line with the aims of the South Downs National Park, a landscape of national importance.	<ul style="list-style-type: none"> • Conserving and enhancing the natural environment • Achieving well-designed places
Objective 2: Carefully manage the siting of development to protect the individual identity and setting of Bramber. This relates to both the character of its built heritage and the importance of the wider protected landscape setting and links between the two.	<ul style="list-style-type: none"> • Conserving and enhancing the historic environment • Achieving well-designed places
Objective 3: Ensure that development mitigates climate change, is sustainable and sympathetic to the scale, landscape setting, topography and architectural and historic character of where it is sited in the parish.	<ul style="list-style-type: none"> • Meeting the challenge of climate change, flooding and coastal change • Achieving well-designed places • Conserving and enhancing the historic environment • Conserving and enhancing the natural environment
Objective 4: Plan for some additional housing to meet predominantly local housing needs, bearing in mind changing demographics, to provide a more balanced housing mix, in particular for local affordability and elderly downsizers.	<ul style="list-style-type: none"> • Delivering a sufficient supply of homes • Promoting healthy and safe communities • Achieving well-designed places
Objective 5: Address local transport issues, including car and parking issues, but predominantly promoting sustainable transport options by improving connectivity to facilities within and beyond the parish by integrating and, where possible, extending the existing network of paths, separated where possible, to provide safe pedestrian, cycle and horse riding routes. This includes safety of crossing points over the length of the A283 as it cuts through the parish.	<ul style="list-style-type: none"> • Promoting sustainable transport
Objective 6: Promote opportunities for sustainable tourism, particularly where it enables increased public accessibility to, and enjoyment of, the national park for recreation and leisure.	<ul style="list-style-type: none"> • Building a strong, competitive economy
Objective 7: Safeguard local green spaces that are valued by the community, improve their biodiversity and integrate them with the footpath and bridleway network. This will help to contribute to the aims for the South Downs National Park in conserving and enhancing the natural beauty and wildlife of the national park.	<ul style="list-style-type: none"> • Conserving and enhancing the natural environment
Objective 8: Support existing businesses operating in the parish and provide opportunities for new ones where this can be achieved sustainably.	<ul style="list-style-type: none"> • Building a strong, competitive economy
Objective 9: Retain and, where possible, expand the range of facilities and amenities available for local residents.	<ul style="list-style-type: none"> • Promoting healthy and safe communities

Table 2.2: Assessment of how each policy in the Plan conforms to the NPPF

Policy Title and Reference	NPPF Reference (paragraph)	Commentary
Spatial strategy		
POLICY B1: LOCATION OF DEVELOPMENT	16, 17, 24, 28, 83a, 118	<p>A core principle of national policy is the need for the planning system to contribute to sustainable development.</p> <p>The NPPF states that plans should be developed that support the strategic development needs set out in the Local Plan and actively manage patterns of growth. This policy takes a positive approach to development by defining the Built Up Area Boundary to enable a balanced approach to delivering the housing need while protecting the open countryside and green spaces beyond the more urban edge from inappropriate uses. Much of the parish falls within the South Downs National Park and it is important to find a balance between providing homes and protecting the landscape and its setting.</p> <p>The policy also supports the most effective use of land, for instance by encouraging the reuse of vacant buildings and also prioritising the redevelopment of brownfield sites.</p>
Design and heritage policies		
POLICY B2: CHARACTER OF DEVELOPMENT	125, 127	National policy encourages neighbourhood plans to develop robust and comprehensive design policies that, amongst other things, ensure that development responds to local character and history and reflects local identity. This policy contributes to this aim by ensuring that development in the neighbourhood area is designed to respect the recognisable character of the Bramber including the characteristics of locally identified 'Conservation Areas', 'Character Areas'.
POLICY B3: DESIGN OF DEVELOPMENT	124, 125, 126, 127, 149	The policy seeks to ensure that development is in keeping with the design of surrounding context, without stifling good or innovative design. This is in line with the national aim to plan positively for the achievement of high quality and inclusive design for all development. The policy encourages developers to engage with communities on local design matters, for instance using the Bramber Design guidelines.
POLICY B4: ENERGY EFFICIENCY AND DESIGN	149, 150, 151	The policy supports the national objective of designing development to minimise its negative impact on climate change. In particular it seeks to provide safe and secure layouts and encourage a series of environmentally sustainable design features, aimed at reducing energy consumption and energy loss, that should be incorporated into both new development and to retrofit into historic buildings.

Policy Title and Reference	NPPF Reference (paragraph)	Commentary
Environment and countryside policies		
POLICY B5: PROTECTING FLORA AND FAUNA	170, 172, 174	This policy supports the national objective of ensuring that development contributes to and enhances the natural environment, through the protection special landscape areas, encouraging local biodiversity and maintaining and enhancing locally significant landscape features, such as trees, woodland and hedgerows. The policy seeks to ensure that all development achieves a net gain in biodiversity.
POLICY B6: GREEN INFRASTRUCTURE	170, 171, 172	The policy contributes to the national objective of encouraging well-designed developments that establish a strong sense of place, in particular by integrating existing and new green open space. This brings benefits to the community, by enabling access to green space for leisure and recreation purposes. It also benefits local wildlife by securing green spaces and corridors that help flora and fauna to flourish.
POLICY B7: PROTECTION AND MAINTENANCE OF LOCAL GREEN SPACES	99, 100, 101, 145	National policy enables local communities to identify, for special protection, green areas of importance to them known as Local Green Spaces. This policy designates two areas, identified by the local community as important and demonstrably special, as Local Green Spaces, which will be protected from inappropriate development.
POLICY B8: PROTECTING THE ADUR RIVER CORRIDOR	170, 174	The policy supports national policy in seeking to protect and enhance the river corridor environment, which plays a vital role in supporting a range of flora and fauna. Equally, it seeks to support public access to this environment, where it is appropriate.
POLICY B9: PROTECTION OF LOCALLY SIGNIFICANT VIEWS	124, 125, 127	This policy contributes to the NPPF objectives of requiring good design and conserving and enhancing the historic and natural environment. It seeks to protect locally important views, often incorporating heritage assets, from development that would reduce their contribution towards the character of the neighbourhood area.
Transport and movement policies		
POLICY B10: ENCOURAGING SUSTAINABLE MOVEMENT	91, 98, 102, 103, 104	The policy supports the NPPF objective of encouraging sustainable modes of transport by identifying key movement routes within the neighbourhood area and protecting, maintaining and enhancing these where possible.

Policy Title and Reference	NPPF Reference (paragraph)	Commentary
POLICY B11: PUBLIC CAR PARKING	105, 106	The NPPF sets out that local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists. This policy supports that objective by safeguarding against the loss of accessible car parking and providing for additional space to access the National Park, where such space would not be detrimental to the landscape.
POLICY B12: RESIDENTIAL CAR PARKING	104, 105, 106	This policy seeks to ensure that residential development is designed with adequate off-street car parking, to minimise parking on-street, which leads to issues such as traffic congestion and reduced road safety. It also supports the provision of infrastructure designed to encourage sustainable transport modes, such as adequate cycle parking.
Community facilities policies		
POLICY B13: COMMUNITY FACILITIES AT ST NICHOLAS CHURCH	91, 92	The NPPF encourages planning policy that contributes to healthy, inclusive communities. St Nicholas Church provides a focal point for community activity in the parish and this policy supports the continuation and expansion of that role, and the facilities to enable it.
POLICY B14: SUPPORT THE CREATION OF AN EDUCATION CENTRE AT ST MARY'S HOUSE AND GARDENS	91, 92	Similar to Policy B13, this policy supports the provision of an education centre at St Mary's House and Gardens, which will contribute to the national aim of developing inclusive communities and enable the greater appreciation and understanding of the heritage asset itself.
Local economy policies		
POLICY B15: COMMERCIAL PREMISES AND LAND	80, 81, 118, 127	This policy seeks to protect existing commercial land and premises that is valuable in maintaining the vitality of the local economy in Bramber. It supports the national aim of encouraging economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.

3 Basic condition (iv) - contribution to sustainable development

- 3.1. The NPPF states in paragraph 7 that ‘the purpose of the planning system is to contribute to the achievement of sustainable development.’
- 3.2. For the Plan, sustainable development has been the fundamental basis of each of its policies. The National Planning Practice Guidance advises that ‘sufficient and proportionate evidence should be presented on how the draft neighbourhood plan ... guides development to sustainable solutions’².
- 3.3. Table 3.1 below summarises how the objectives and policies in the Plan contribute towards sustainable development, as defined in the NPPF. Many of the objectives of the Plan overlap the three strands of sustainability, so for the purposes of this document, the most relevant strand has been taken to illustrate conformity.

Table 3.1: Assessment of Plan objectives and policies against sustainable development

Deliver economic sustainability	
NPPF definition – ‘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.’	
NP Objectives	<p>Objective 6: Promote opportunities for sustainable tourism, particularly where it enables increased public accessibility to, and enjoyment of, the national park for recreation and leisure.</p> <p>Objective 8: Support existing businesses operating in the parish and provide opportunities for new ones where this can be achieved sustainably.</p>
NP Policies	POLICY B15: COMMERCIAL PREMISES AND LAND
Commentary	<p>The NPPF seeks to secure economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future. This includes supporting the viability of local centres and also encouraging a sustainable rural economy.</p> <p>The NP supports these national aims, promoting a sustainable and viable local economy by protecting, where viable, existing employment generators in the neighbourhood area as well as encouraging new, flexible employment generating developments to locate here, including through the conversion of vacant buildings, such as agricultural barns.</p> <p>The parish is very rural and as such it is an attractive location for workers seeking a more flexible approach to employment, including home-working. The Plan seeks to support this sector by ensuring that the right conditions are in place – for instance relating to broadband availability. In addition, it acknowledges the important role tourism development plays in the local economy.</p> <p>In these ways, the Plan seeks to contribute to building a sustainable economy.</p>

² Planning Practice Guidance, Paragraph: 072 Reference ID: 41-072-20140306

Deliver social sustainability	
NPPF definition – ‘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.’	
NP Objectives	<p>Objective 4: Plan for some additional housing to meet predominantly local housing needs, bearing in mind changing demographics, to provide a more balanced housing mix, in particular for local affordability and elderly downsizers.</p> <p>Objective 5: Address local transport issues, including car and parking issues, but predominantly promoting sustainable transport options by improving connectivity to facilities within and beyond the parish by integrating and, where possible, extending the existing network of paths, separated where possible, to provide safe pedestrian, cycle and horse riding routes. This includes safety of crossing points over the length of the A283 as it cuts through the parish.</p> <p>Objective 9: Retain and, where possible, expand the range of facilities and amenities available for local residents.</p>
NP Policies	<p>POLICY B1: LOCATION OF DEVELOPMENT</p> <p>POLICY B10: ENCOURAGING SUSTAINABLE MOVEMENT</p> <p>POLICY B11: PUBLIC CAR PARKING</p> <p>POLICY B12: RESIDENTIAL CAR PARKING</p> <p>POLICY B13: COMMUNITY FACILITIES AT ST NICHOLAS CHURCH</p> <p>POLICY B14: SUPPORT THE CREATION OF AN EDUCATION CENTRE AT ST MARY’S HOUSE AND GARDENS</p>
Commentary	<p>The NPPF underlines the importance of supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being.</p> <p>The Neighbourhood Plan has been developed as a result of extensive local engagement to understand local priorities to contribute to this national objective. Bramber is an extremely rural parish with much of the area falling within the protected South Downs National Park. The remainder comprises the historic village, much of which is in flood plain (to the east) and there are numerous listed buildings and two scheduled ancient monuments. The parish is therefore extremely constrained in terms of land available for new development. In spite of this the Neighbourhood Plan has proactively sought to identify potential sites that might be suitable for development. Only two sites were put forward and neither were assessed as suitable for development. That is not to say that future sites may come forward and the Plan commits to an early review of the neighbourhood plan, which may yield additional sites. In readiness for this, the Plan has developed a Design Guide for development, so that it will be in-keeping with the character of the parish.</p> <p>The Plan sets out locally specific design criteria, with a focus on creating safe and accessible environments that encourage inclusivity and a sense of local pride.</p>

	<p>Supporting healthy and inclusive living is an important aim of the Plan and this is achieved by encouraging active travel (walking and cycling), easy access to green space and the surrounding environment and the development of community facilities at St Nicholas Church and St Mary’s House and Gardens.</p> <p>In these ways, the Plan aims to support a strong, vibrant and healthy community.</p>
Deliver environmental sustainability	
<p>NPPF definition – ‘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’</p>	
<p>NP Objectives</p>	<p>Objective 1: Protect and enhance the rural character of the parish, the qualities of its landscape setting and its biodiversity, managing the impacts of any future growth in line with the aims of the South Downs National Park, a landscape of national importance.</p> <p>Objective 2: Carefully manage the siting of development to protect the individual identity and setting of Bramber. This relates to both the character of its built heritage and the importance of the wider protected landscape setting and links between the two.</p> <p>Objective 3: Ensure that development mitigates climate change, is sustainable and sympathetic to the scale, landscape setting, topography and architectural and historic character of where it is sited in the parish.</p> <p>Objective 7: Safeguard local green spaces that are valued by the community, improve their biodiversity and integrate them with the footpath and bridleway network. This will help to contribute to the aims for the South Downs National Park in conserving and enhancing the natural beauty and wildlife of the national park.</p>
<p>NP Policies</p>	<p>POLICY B2: CHARACTER OF DEVELOPMENT POLICY B3: DESIGN OF DEVELOPMENT POLICY B4: ENERGY EFFICIENCY AND DESIGN POLICY B5: PROTECTING FLORA AND FAUNA POLICY B6: GREEN INFRASTRUCTURE POLICY B7: PROTECTION AND MAINTENANCE OF LOCAL GREEN SPACES POLICY B8: PROTECTING THE ADUR RIVER CORRIDOR POLICY B9: PROTECTION OF LOCALLY SIGNIFICANT VIEWS</p>
<p>Commentary</p>	<p>The parish area benefits from a high quality environment; much of the rural parts of the parish are set within the South Downs National Park and this provides a striking backdrop for the historic village core just beyond the boundary.</p> <p>Despite being geographically located close to the neighbouring settlements of Steyning and Upper Beeding, Bramber has managed to retain its own distinctive character and this is set out more fully in the Bramber Design Guidelines. This distinctive character is highly valued by the local people community and the plan seeks to restrict further coalescence, which could diminish this, while celebrating the features of Bramber – both historical and natural – that have, over centuries, contributed to making the village and wider parish what it is today.</p> <p>The area’s green spaces, trees and hedgerows are an important part of what defines the area in particular. The Plan seeks to these green spaces for future generations to enjoy and to enable green corridors for wildlife.</p> <p>Equally important is maintaining and improving the built environment. The Plan</p>

	<p>supports high quality design that complements the character of the area, while not stifling innovation. There are many significant heritage buildings and structures in the area and design of any new development or redevelopment is expected to complement and enhance this.</p> <p>The Plan sets out locally specific design criteria, supporting the national aspiration for high quality design, and has sought to minimise impacts on climate change, for instance through the installation of alternative energy technologies with developments.</p> <p>The Plan emphasises the need to promote non-car modes of transport in order to reduce traffic congestion and travel by the private car to reduce carbon emissions.</p> <p>In these ways, the Plan seeks to contribute to protecting and enhancing the natural, built and historic environment of the neighbourhood area.</p>
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- 3.4. As demonstrated in Table 3.1, the strategic objectives of the Plan are considered to comprise a balance of social, economic and environmental goals. The policies in the Plan demonstrably contribute to sustainable development.

4 Basic condition (v) - general conformity with the strategic policies of the development plan

4.1 The adopted Local Plan currently consists of the following:

- 2015 Horsham Development Planning Framework (HDPF)
- 2019 South Downs Local Plan (SDLP)
- 2014 West Sussex Waste Local Plan
- 2018 West Sussex Joint Minerals Local Plan

4.2 Table 4.1 details the Neighbourhood Plan policies alongside a consideration of how they are in general conformity with the strategic policies in the 2015 HDPF and the 2019 SDLP.

4.3 Where a policy is not identified in Table 4.1, it is considered that the Neighbourhood Plan does not contain any policies that directly relate to it.

4.4 It is confirmed that there are no policies in the 2014 West Sussex Waste Local Plan that the Neighbourhood Plan policies have any relevance to.

4.5 Local Plan policies that are not identified in Table 4.1 are not considered to be relevant to the Neighbourhood Plan because the Neighbourhood Plan does not have any policies that directly relate to it.

Table 4.1: Relevant strategic policies in the Horsham District Planning Framework (2015) and the South Downs Local Plan (2019)

Policy Title and Reference	Horsham District Planning Framework (2015)	South Downs Local Plan (2019)	Commentary
POLICY B1: LOCATION OF DEVELOPMENT	Policy 3: Development Hierarchy Policy 4: Settlement Expansion Policy 26: Countryside Protection Policy 27: Settlement Coalescence Policy 30: Protected Landscapes	Policy SD1: Sustainable Development Policy SD25: Development strategy Policy SD26: Supply of homes	This policy defines where development should be permitted within Bramber parish; that is within the defined Built Up Area Boundary. This is to ensure that development does not impact detrimentally on the protected landscape of the South Downs National Park and its setting (including visual impact) and to prevent coalescence with neighbouring settlements.
POLICY B2: CHARACTER OF DEVELOPMENT	Policy 32: The Quality of New Development Policy 33: Development Principles Policy 34: Heritage Assets and Managing Change within the Historic Environment Policy 35: Climate Change	Policy SD4: Landscape Character Policy SD5: Design Policy SD6: Safeguarding Views Policy SD12: Historic Environment Policy SD13: Listed buildings	The strategic planning context highlights the importance of protecting the distinctiveness of the different settlements throughout the district and the South Downs National Park. Policy B2 of the Neighbourhood Plan notes the existing Conservation Areas and proposes new Character Areas within Bramber, adding additional local detail to the strategic policy about architecture, design, materials, in order to ensure that development complements and conserves the existing historic character of the parish. In addition, the policy highlights the importance of the rural setting of Bramber, much of which is either in or bordering the South Downs National Park, and supports development that conserves and enhances the landscape character.

Policy Title and Reference	Horsham District Planning Framework (2015)	South Downs Local Plan (2019)	Commentary
POLICY B3: DESIGN OF DEVELOPMENT	Policy 16: Meeting Local Housing Needs Policy 32: The Quality of New Development Policy 33: Development Principles Policy 35: Climate Change Policy 42: Inclusive Communities	Policy SD5: Design	This policy conforms to the strategic policies by promoting high quality and inclusive design for all development that is in keeping with the local context. The policy sets out, at a local level, key criteria for design, seeking high standards of building materials, finishes and measures to reduce flood risk. It seeks to ensure that housing is designed to meet the needs of residents as they grow older, in particular promoting the Lifetime Home standards.
POLICY B4: ENERGY EFFICIENCY AND DESIGN	Policy 32: The Quality of New Development Policy 35: Climate Change Policy 36: Appropriate Energy Use Policy 37: Sustainable Design and Construction	Policy SD14: Climate Change Mitigation and Adaptation of Historic Buildings Policy SD48: Climate Change and Sustainable Use of Resources Policy SD51: Renewable Energy Policy SD54: Pollution and Air Quality	The policy encourages development to achieve the highest level of sustainable design, including support for the retrofitting of historic buildings, where this can be achieved without impacting significantly on their architectural and historic value. It sets out measurable targets for energy and water use, where viable. This is particularly important in light of the national and global commitments and tackle climate change.
POLICY B5: PROTECTING FLORA AND FAUNA	Policy 25: District Character and the Natural Environment Policy 30: Protected Landscapes Policy 31: Green Infrastructure and Biodiversity	Policy SD1: Sustainable Development Policy SD9: Biodiversity and Geodiversity Policy SD11: Trees, Woodland and Hedgerows	The strategic policies of both Local Plans place great significance on preserving and enhancing biodiversity. Trees, woodland and hedgerows have been identified as key natural features in the area, which are also important habitats for fauna. This policy seeks to protect these features, as well as the wider National Park landscape and setting.

Policy Title and Reference	Horsham District Planning Framework (2015)	South Downs Local Plan (2019)	Commentary
POLICY B6: GREEN INFRASTRUCTURE	Policy 25: District Character and the Natural Environment Policy 31: Green Infrastructure and Biodiversity	Policy SD9: Biodiversity and Geodiversity Policy SD45: Green Infrastructure	This policy seeks to safeguard existing green spaces, local landscape and green infrastructure networks, to support biodiversity and environmental net gain. This is particularly important in the context of the National Park, and the areas beyond it, where green spaces provide important corridors and stepping stones for wildlife. This complements the environmental policies of the Local Plans.
POLICY B7: PROTECTION AND MAINTENANCE OF LOCAL GREEN SPACES	Policy 25: District Character and the Natural Environment Policy 30: Protected Landscapes Policy 31: Green Infrastructure and Biodiversity	Policy SD47: Local Green Spaces	This policy designates two green areas that have been identified by the local community as having special qualities that warrant their protection for future generations as Local Green Spaces. This supports the strategic objective at the district to protect green spaces.
POLICY B8: PROTECTING THE ADUR RIVER CORRIDOR	Policy 25: District Character and the Natural Environment Policy 31: Green Infrastructure and Biodiversity	Policy SD9: Biodiversity and Geodiversity Policy SD17: Protection of the Water Environment Policy SD45: Green Infrastructure	This policy seeks to encourage public access to the River Adur corridor, where it does not impact negatively on the ecological networks, character and setting. This is in line with strategic policies.
POLICY B9: PROTECTION OF LOCALLY SIGNIFICANT VIEWS	Policy 25: District Character and the Natural Environment	Policy SD6: Safeguarding Views	The policy protects a series of local views that have been identified by the local community as being particularly important and reflective of local character and sense of place. This is underpinned at the strategic level by the objective to protect and where possible, enhance key public views and vistas, including of landmarks and important heritage assets.

Policy Title and Reference	Horsham District Planning Framework (2015)	South Downs Local Plan (2019)	Commentary
POLICY B10: ENCOURAGING SUSTAINABLE MOVEMENT	Policy 40: Sustainable Transport	Policy SD19: Transport and Accessibility Policy SD20: Walking, Cycling and Equestrian Routes	This policy supports the strategic ambition to increase opportunities for walking, cycling and equestrian, which will impact positively on the health and well-being of those living in the area. A network of key movement routes, which should be prioritised for maintaining and connected to, is set out, along with suggestions for specific improvements to aid permeability of the road network by non-car modes.
POLICY B11: PUBLIC CAR PARKING	Policy 41: Parking	Policy SD22: Parking Provision	The policy seeks to ensure that existing public car parking space is retained and additional car parking provided, where possible, to serve those seeking to access the National Park. Support is given to the provision of sustainable parking infrastructure, including electric charging points and cycle facilities.
POLICY B12: RESIDENTIAL CAR PARKING	Policy 41: Parking	Policy SD22: Parking Provision	Whilst the Plan predominantly seeks to encourage non-car movement, particularly for local journeys, much of the existing car parking related to homes is on-street, because of the age of the properties. This policy seeks to ensure that new development incorporates off-street parking to reduce any further exacerbation of the problems caused by on-street parking.
POLICY B13: COMMUNITY FACILITIES AT ST NICHOLAS CHURCH	Policy 42: Inclusive Communities Policy 43: Community Facilities, Leisure and Recreation	Policy SD43: New and Existing Community Facilities	The policy highlights the importance of community facilities locally and supports the upgrading and expansion of them at St Nicholas Church.
POLICY B14: SUPPORT THE CREATION OF AN EDUCATION CENTRE AT ST MARY'S HOUSE AND GARDENS	Policy 42: Inclusive Communities Policy 43: Community Facilities, Leisure and Recreation	Policy SD43: New and Existing Community Facilities	The policy highlights the importance of community facilities locally and supports the creation of an education centre at St Mary's House and Gardens.

Policy Title and Reference	Horsham District Planning Framework (2015)	South Downs Local Plan (2019)	Commentary
POLICY B15: COMMERCIAL PREMISES AND LAND	Policy 7: Economic Growth Policy 10: Rural Economic Development	Policy SD34: Sustaining the Local Economy SD35: Employment Land	The policy encourages sustainable local employment by safeguarding existing employment sites in the parish and encouraging new employment, where it does not impact detrimentally on the landscape and local heritage.

5 Basic Condition (vi) - conformity with EU obligations

- 5.1 The Plan and the process under which it was made conforms to the SEA Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 5.2 Horsham District Council (HDC) is the lead authority for Bramber's Neighbourhood Plan. It has issued a 'standard' screening for all neighbourhood plans within the district, which states that if a neighbourhood plan is allocating sites for development then it could have a significant environmental impact, therefore a Strategic Environmental Assessment (SEA) is required.
- 5.3 The Bramber Neighbourhood Plan does not allocate sites and it has been confirmed by HDC that an SEA is not required. Nevertheless, a Scoping Report was developed and consulted on between June and July 2019, to determine the sustainability criteria against which the Bramber Neighbourhood Plan should be assessed, to ensure that it contributes to the achievement of sustainable development.
- 5.4 This Scoping Report informed the development of a Sustainability Statement, which was prepared in August 2019 to support the Pre-Submission (Regulation 14) Version of the Bramber Neighbourhood Plan. This Report was consulted on with the statutory bodies (the Environment Agency, Natural England and Historic England) to assist in the determination of whether or not the Bramber Neighbourhood Plan would have significant environmental effects in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 5.5 Relevant representations were duly taken into account in the final version of the Sustainability Statement, which accompanies the Submission (Regulation 16) Version of the Plan.

6 Basic condition (vii) - conformity with the prescribed conditions

- 6.1 Under Directive 92/43/EEC, also known as the Habitats Directive³, it must be ascertained whether the draft Plan is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulation Assessments ("HRA"). An appropriate assessment ("AA") is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether or not it is necessary to undertake an assessment, a screening process is followed.
- 6.2 A screening opinion in respect of Habitats Regulations Assessment (HRA) was prepared, which was subject to consultation with relevant stakeholders including Natural England. Their response concluded that the "agree with the conclusion of the report of no likely significant effect upon the named European designated sites:
- Arun Valley Special Protection Area (SPA) – 16.8km
 - Arun Valley Special Area of Conservation (SAC) – 14.9km
 - The Mens Special Area of Conservation (SAC) – 20.4km
- 6.3 In addition to conforming to its EU obligations, the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights.
- 6.4 The Scoping Report and the Sustainability Report, including the responses received from the statutory bodies, has been submitted to accompany the Submission (Regulation 16) Version Neighbourhood Plan stage as part of the evidence base.

³ Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>

7 Conclusion

- 7.1. The relevant Basic Conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the Bramber Neighbourhood Plan and all the policies therein. It is therefore respectfully suggested to the Examiner that the Bramber Neighbourhood Plan complies with Paragraph 8(1) (a) of Schedule 4B of the Act.