

**Cowfold Neighbourhood Plan
Sustainability Appraisal (incorporating
Strategic Environmental Assessment)
Non-Technical Summary**



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1. INTRODUCTION

- 1.1. This Sustainability Appraisal (incorporating Strategic Environmental Assessment) Non-Technical Summary has been prepared in support of the Cowfold Neighbourhood Plan (CNP).
- 1.2. It provides a a non-technical summary of the information within the Sustainability Appraisal (SA) main report.

2. COWFOLD NEIGHBOURHOOD PLAN

- 2.1. Horsham District Council (HDC), as the Local Planning Authority, approved the designation of the Parish of Cowfold as a Neighbourhood Plan Area in May 2016.
- 2.2. The CNP has been prepared by Cowfold Parish Council (CPC) in accordance with the Neighbourhood Planning (General) Regulations 2012.
- 2.3. This CNP reflects the culmination of work by the Neighbourhood Plan Working Group (NPWG) since CPC was designated for neighbourhood planning purposes. The preparation of the CNP has involved extensive background work and stakeholder engagement.
- 2.4. It sets out the Vision and Strategic Objectives of the CNP along with planning policies and aims to guide development in the Parish up to 2031.

3. SUSTAINABILITY APPRAISAL

- 3.1. A SA is a systematic process to promote sustainable development by assessing the extent to which a Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. ¹
- 3.2. It is a process to consider ways by which a Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse impacts that the Plan might otherwise have. By doing so, it can help ensure that the proposals in the Plan are the most appropriate, given reasonable alternatives. SA's are an iterative process, informing the development of the Plan.
- 3.3. There is no legal requirement for a neighbourhood plan to have a SA as set out in section 19 of the Planning and Compulsory Purchase Act 2004. However, a Qualifying Body must demonstrate how its plan or order will contribute to achieving sustainable development. Government guidance advises a SA may be a useful approach for demonstrating how their draft plan or order meets this Basic Condition. ²
- 3.4. A Strategic Environmental Assessment (SEA) involves the evaluation of the environmental impact of a Plan or programme. It is a requirement, as set out in the European Directive 2001/42/EC. It has been enacted into UK Law through the Environmental Assessment of Plans and Programmes Regulations 2004.
- 3.5. National Planning Policy Guidance advises a neighbourhood plan may require an environmental assessment if it is likely to have a significant effect on the environment. Where this is the case the

¹ Paragraph: 001 Reference ID: 11-001-20140306

² Paragraph: 026 Reference ID: 11-026-20140306

draft neighbourhood plan may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004. Guidance advises this may be the case, for example, where a neighbourhood plan allocates sites for development.³

- 3.6. Having regard to the legislative obligations and Government guidance, CPC have resolved to undertake a SA that incorporates a Strategic Environmental Assessment. Where reference is made in this report to a SA, it includes the incorporation of a Strategic Environmental Assessment.

4. SCOPING REPORT

- 4.1. Government guidance advises a Scoping Report must identify the scope and level of detail of the information to be included in the environmental report. It should set out the context, objectives and approach of the assessment; establish the baseline; and identify relevant environmental issues and objectives. A key aim of the scoping procedure is to help ensure the strategic environmental assessment is proportionate and relevant to the neighbourhood plan being assessed.⁴

- 4.2. In light of Government Guidance, the Scoping Report to the CNP set out the:

- ▶ Background to the meaning of sustainable development;
- ▶ Vision and objectives of the CNP;
- ▶ Sustainability Appraisal methodology.

- 4.3. In addition, it set out

- ▶ Relevant policies, Plans, programmes and environmental protection objectives;
- ▶ Evidence baseline information;
- ▶ Issues, problems and trends; and
- ▶ Proposed sustainability objectives and indicators (known as the Sustainability Framework).

- 4.4. The Scoping Report confirmed the SA will consider the effects of the CNP against reasonable alternatives, using a series of objectives and indicators.

- 4.5. The SA will identify objectives that cover the 3 limbs of sustainability, i.e. Environmental, Social and Economic. These will be capable of being measured against a set of indicators. Collectively, the sustainability objectives and the indicators are known as the Sustainability Framework. These will be used to ensure that the policy options selected in the CNP contribute to the overarching aim of sustainable development.

- 4.6. The performance of the policy options are measured against the objectives as follows:

³ National Planning Policy Guidance: Paragraph: 073 Reference ID: 41-073-20140306

⁴ Paragraph: 034 Reference ID: 11-034-20150209

✓✓	Significant positive impact on the sustainability objective
✓	Positive impact on the sustainability objective
?✓	Possible positive or slight positive impact on the sustainability objective
0	No impact or neutral impact on the sustainability objective
?✗	Possible negative or slight negative impact on the sustainability objective
✗	Negative impact on the sustainability objective
✗✗	Significant negative impact on the sustainability objective

- 4.7. The Sustainability Objectives have been informed by the appraisal of the identification of other relevant policies, Plans, programmes and environmental protection objectives, the collection of baseline information, and the identification of sustainability issues and problems. The latter have, in part, been established from the results of the initial evidence gathering and stakeholder engagement and with regard to the Sustainability Framework of the Horsham District Planning Framework.
- 4.8. Based on this, the sustainability objectives and indicators (the Sustainability Framework) of the CNP are as follows:

Theme	Objective
Environmental	Objective 1 - Countryside
Environmental	Objective 2 - Ecology
Environmental	Objective 3 - Heritage Assets
Environmental	Objective 4 - Water and Flooding
Environmental	Objective 5 - Air Quality
Environmental	Objective 6 - Transport
Social	Objective 7 - Housing
Social	Objective 8 - Crime
Social	Objective 9 - Sustainable Transport Patterns
Social	Objective 10 - Community Infrastructure
Economic	Objective 11 - Economy
Economic	Objective 12 - Wealth

- 4.9. The Scoping Report and baseline data was subject to public consultation with statutory bodies (English Heritage, Natural England, the Environment Agency) in March 2018 for a five week period.
- 4.10. In response to the consultation, the Environment Agency advised of their support for the inclusion of Objective 2: Ecological and Objective 4: Water and Flooding and associated indicators.
- 4.11. The Environment Agency recommended the SEA takes account of relevant policies, plans and strategies including the local Strategic Flood Risk Assessment, flood risk strategies and the South East River Basin Management Plan.
- 4.12. In response to the consultation, Natural England (NE) advised their records show that the parish of Cowfold includes priority habitats (deciduous woodland) and irreplaceable habitats (ancient woodland). NE advised this information needs to be added to the text and a map included. In addition, NE also advised as there is also deciduous woodland priority habitat present, and a relevant indicator should be included.
- 4.13. NE noted that part of the parish (to the north-east) includes a designated landscape, the High Weald Area of Outstanding Natural Beauty, and recommended that this be added to the text and a map included. NE also advised an indicator in relation to impact on the AONB should be included.
- 4.14. This information has been included in the SA and the extent of the High Weald AONB, in due course, will be illustrated on the Proposals Map.
- 4.15. No response to the Scoping Report was received from Historic England.

5. PRE-SUBMISSION SUSTAINABILITY APPRAISAL OF THE COWFOLD NEIGHBOURHOOD PLAN

- 5.1. The Pre-submission SA sets out:
- An appraisal of the SA (inc SEA) methodology;
 - A summary of the baseline information, identification of the plans, policies and programmes that have an impact on the CNP (with updates) and a summary of the challenges for the future of the Parish;
 - The Sustainability Framework - Objectives and indicators;
 - An appraisal of policy options;
 - An appraisal of housing options; and
 - Next steps.
- 5.2. With respect to the Sustainability Framework this has emerged through careful appraisal of relevant International, National, Regional, District and Local Plans and Programmes, the collection of baseline data, local knowledge of sustainability challenges faced in the Parish and a SWOT analysis.

- 5.3. The Pre-submission SA assessed the Strategic Objectives of the CNP for compatibility with the 12 Sustainability Objectives. This confirmed the CNP Strategic Objectives and the Sustainability Objectives are compatible or have a neutral impact. This exercised indicated that the CNP is being prepared positively with the aim of solving some of the sustainability issues identified and that the Sustainability Objectives are appropriate to measure the extent to which it achieves this.
- 5.4. In addition, a comparative assessment has been undertaken of the policies to test their mutual compatibility. This exercise has confirmed that most policies are either compatible or have a neutral impact. The SA identifies the most suitable policy option, having regard to all of the sustainability objectives. In recommending the preferred policy option, weight is placed on the sustainability objectives most closely linked with the specific policy being appraised.
- 5.5. In order to meet the Strategic Objectives of the CNP and address some of the challenges facing the Parish, a range of policy areas and aims were selected for inclusion within the CNP. These are appraised as part of the Pre-submission SA to determine whether they have a positive or negative impact, using the Sustainability Framework.
- 5.6. A range of policy areas and aims have been considered and a range of options for each policy have been identified. All policy options and aims have been appraised, to assess the impact on the 12 sustainability objectives set out in the Sustainability Framework. The overall appraisal ensures that the policies and aims selected and taken forward in the CNP are the most sustainable, given reasonable alternatives.
- 5.7. In addition to the policy appraisal, an appraisal has been undertaken of the candidate housing sites. All potential housing sites were each tested against the Sustainability Framework. The Assessment shows the majority of potential housing sites would have some negative impact on environmental Objectives. The extent of this varies dependent on the location of the site. In order to seek to facilitate the delivery of housing need in the parish, it is considered inevitable there will be some harm, particularly against Environmental Objectives. Mitigation measures to minimise this have been duly considered and are set out in individual Housing Sites Assessments. The sites selected for allocation for housing development, to meet the needs of the Plan area have been chosen with regard to minimising their environmental impact, including through the use of mitigation measures. Overall, it is considered the housing number proposed to be facilitated in the CNP and the sites allocated to meet this need will not have detrimental significant environmental effects.
- 5.8. The Pre-submission SA was consulted on alongside the Pre-submission CNP for a 8 week period from 19 August - 14 October 2019.
- 5.9. Due to an administrative error, a further 6 week consultation on the Pre-submission CNP and SA was undertaken between 12 November - 24 December 2019.

6. REPRESENTATIONS MADE IN RESPONSE TO THE REGULATION 14 PRE-SUBMISSION SUSTAINABILITY APPRAISAL

- 6.1. In response to consultation on the Pre-submission CNP and accompanying SA, 69 responses were received.
- 6.2. A total of 2 representations were received in respect of the SA from:

- Historic England
- Gladman

Historic England

- 6.3. Historic England (HE) raised concerns that the Sustainability Appraisal did not identify the potential impact of the development on the significance of heritage assets, and how this had been taken into account in allocating the 'Potters' site, together with mitigation measures to minimise negative impacts.

Response to Historic England

- 6.4. A detailed response to these representations is contained in the Background Paper "Response to Regulation 14 Pre-submission Representations in respect of Heritage Matters".

Gladman

- 6.5. Gladman's representations note that the SA sets out how the housing sites have been assessed and why the preferred option has been selected (paragraphs 5.6 to 5.9), including the decision to allocate land at Brook Hill and Potters; and that these allocations represent the most sustainable option for the Parish as the sites with the least environmental effects have been allocated. The representations question whether this is consistent with the assessment of each of the reasonable alternatives.
- 6.6. In addition, representations submit that the SA has tilted the balance too far in favour of the environmental objective of achieving sustainable development.
- 6.7. Representations also assert that the assessment of the reasonable alternatives are likely to need to be revisited.

Response to Gladman

- 6.8. A detailed response to these representations is contained in the Background Paper "Response to Regulation 14 Pre-submission Representations in Respect of Housing Matters".

7. SUBMISSION SUSTAINABILITY APPRAISAL OF THE COWFOLD NEIGHBOURHOOD PLAN

- 7.1. As a result of the overall feedback received in response to the Regulation 14 Pre-submission consultation, a number of minor amendments were made to the CNP to strengthen and clarify policies and to ensure alignment with the Horsham District Planning Framework and national planning policy guidance although no substantive changes have been made to the Policies or Aims. Consequential minor amendments were also made to the SA.
- 7.2. In response to the comments of Historic England, the appraisals of all candidate housing sites have been updated to explicitly state whether they are located within, or adjoining an Archaeological Notification Area (together with the identification of their proximity to listed buildings and the Conservation Area which is already noted).

- 7.3. Furthermore, and in response to Historic England, the mitigation measures have been updated to detail how these can take account of potential effects on heritage assets.
- 7.4. The Submission CNP and accompanying documents including the SA were finalised in January 2020.