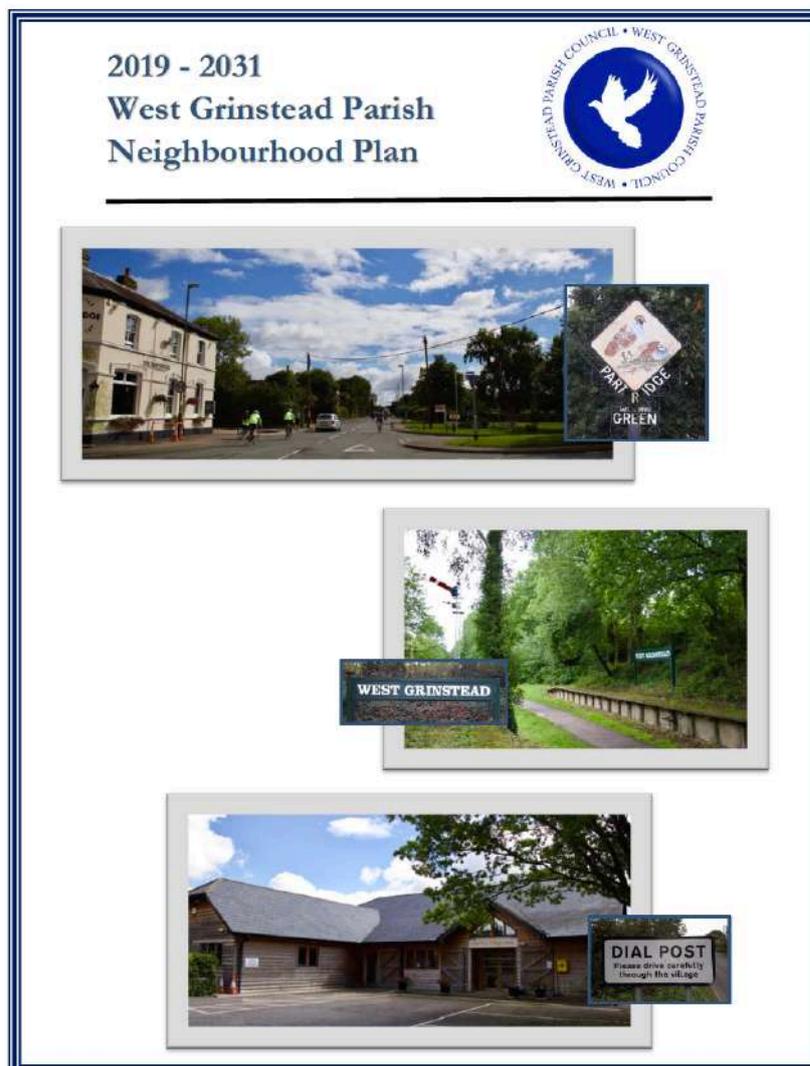


West Grinstead Neighbourhood Plan

Submission Sustainability Appraisal (Incorporating Strategic Environmental Assessment)



March 2020

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Appendix 1 - West Grinstead Neighbourhood Plan Policy Options

1. INTRODUCTION

- 1.1. This Sustainability Appraisal (SA) Report is in respect of the Submission consultation of the West Grinstead Neighbourhood Plan (WGNP).
- 1.2. The Parish is located within Horsham District Council (HDC). It is a predominantly rural Parish, located northwest of Henfield, west of Shermanbury, south west of Southwater and northeast of Ashington. The largest settlement in the Parish is Partridge Green, located toward the south western edge of the Parish. To the north of this are the hamlets of Littleworth and Jolesfield. To the west of these is the hamlet of West Grinstead. The settlement of Dial Post lies to the west of the A24.
- 1.3. Neighbourhood planning is a new way for communities to decide the future of the places in which they live and work. The WGNP has been driven and prepared by West Grinstead Parish Council (WGPC), with input from local residents, community groups and other stakeholders. Throughout this process there has been extensive public consultation and feedback forums.
- 1.4. The WGNP is important for the future of the Parish. If successfully supported at a public referendum, it will become a key material consideration in guiding development in the Parish and determining planning applications up to 2031.
- 1.5. Neighbourhood Plans must be in general conformity with the adopted Development Plan Document (DPD) of the District. The Horsham District Planning Framework (HDPF) is the overarching planning document for Horsham District outside the South Downs National Park (SDNP).
- 1.6. The obligation to undertake an SA is set out in Section 39 of the Planning and Compulsory Purchase Act 2004. This requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. The process involves examining the likely effects of the Plan and considering how they contribute to social, environmental and economic well-being.
- 1.7. A Strategic Environmental Assessment (SEA) involves the evaluation of the environmental impacts of the plan or programme. The requirement for SEA is set out in the European Directive 2001/42/ EC adopted in UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”.
- 1.8. The SEA process is very similar to the SA process, with more prescriptive guidance that needs to be followed in order to meet the SEA Directive’s requirements. Government guidance (in a Practical Guide to the Strategic Environmental Assessment Directive (ODPM 2005)) suggests incorporating the SEA process into the SA and consider economic and social effects alongside the environmental effects considered through the SEA. This approach has been followed. For simplification, this report is referred to as a Sustainability Appraisal, although it incorporates the SEA.
- 1.9. The purpose of this SA is to assess whether the WGNP may have effects on a range of sustainability topics and consider alternatives and mitigation to reduce any negative impact. The SA has been carried out by independent consultants.

- 1.10. Much of the data used in the preparation of the SA comprises ‘baseline information’ which is contained and presented in a Scoping Report prepared in the early stages of this SA process. The Scoping Report collated baseline data on broad areas of economic, social and environmental issues. It analysed a range of environmental protection objectives established at International, European, national or local level which were relevant to the SNP. It considered the implications of other plans and documents and set out a series of Sustainability Objectives. The Scoping Report also set out the proposed methodology for undertaking the SA.
- 1.11. The Scoping Report and baseline data was the subject of public consultation with statutory bodies (Historic England, Natural England, and the Environment Agency) in December 2014. A copy of the Scoping Report was also shared with HDC. The document has been continually updated to ensure that any new plans or documents released whilst the SNP has been prepared, have been assessed.
- 1.12. This report is structured as follows:

Section 2 - Details the SA (inc SEA) appraisal methodology;
Section 3 - Sets out the baseline collection work, identification of the plans, policies and programmes that have an impact on the WGNP, with updates on these in light of feedback on the Scoping Report. It also includes a summary of the challenges for the future of the Parish;
Section 4 - Sets out the objectives and indicators (collectively known as the Sustainability Framework), which will be used to appraise the various policy options. The WGNP objectives are tested against the Sustainability Objectives for compatibility;
Section 5 - Contains the individual policy appraisals, testing realistic options against the Sustainability Framework; and
Section 6 - Sets out the next steps.

- 1.13. The SA process has established a range of sustainability issues and options to be considered in formulating the proposals for the WGNP. It has ensured consideration of a range of potential social, economic and environmental effects. This has enabled the most sustainable policy options to be identified for inclusion with the Submission WGNP.

2. APPRAISAL METHODOLOGY

2.1. This SA has been prepared in accordance with the following Government guidance:

- Sustainability Appraisal guidance within the CLG Plan Making Manual
- SEA guidance from the ODPM “A Practical Guide to the Strategic Environmental Assessment directive” 2005.

2.2. Based on this guidance, a five stage approach has been undertaken in preparing this SA:

Stages in the SA process	
Stages	Tasks
Stage A - Setting the context and Objectives, establishing the baseline and deciding on the scope	<ul style="list-style-type: none"> • Identify other relevant plans and programmes • Collect Baseline Information • Identify Problems • Develop Objectives and the Sustainability Framework • Consult on the scope of the SA
Stage B - Developing and refining alternatives and assessing effects	<ul style="list-style-type: none"> • Test the Plan Objectives against SA Objectives • Develop alternative options • Assess the effects of policy options against the SA Objectives • Consider mitigation • Propose measures to monitor the effects
Stage C - Preparing the Sustainability Appraisal	<ul style="list-style-type: none"> • Present the predicted effects of the Plan, including alternatives
Stage D - Consulting on the WGNP and SA	<ul style="list-style-type: none"> • Give the public and consultation bodies opportunity to comment on the SA • Assess significant changes to the WGNP
Stage E: Monitoring the significant effects of implementing the plan or programme on the environment.	<ul style="list-style-type: none"> • To monitor the effectiveness of the WGNP.

- 2.3. Stage A and the associated tasks have been undertaken as part of the preparation of the Scoping Report. This was published for formal consultation in December 2014. The feedback from this consultation and the consequential changes to the baseline data and sustainability framework are detailed below in this report. The Scoping Report, and responses to it, are an intrinsic part of the SA process, and should be read in conjunction with this report.
- 2.4. Stage B is the main focus of this report. It involves measuring the likely significant social, economic and environmental effects of the strategy and policies contained within the Pre-submission (Regulation 14) WGNP consultation.
- 2.5. Section 4 of this report sets out the Sustainability Framework and tests the objectives of the WGNP against this framework. Section 5 sets out the policy appraisal. This highlights the different advantages and disadvantages of each option, showing the preferred policy is the most sustainable option, giving reasonable alternatives. The following symbols and colours are used to record this:

✓✓	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

Figure 2: Symbols in the SA Process

- 2.6. This scoring system is comparable with the Sustainability Appraisal undertaken by HDC in connection with their production of the HDPF. The appraisal tables provide a summary explanation of the predictions of the effect the policy options will have on the objectives.
- 2.7. The results of Stage B are comprised in this report, which collectively comprises Stage C.
- 2.8. In accordance with Stage D, this report is to be the subject of public consultation alongside the Submission (Regulation 16) WGNP.
- 2.9. Stage E will not take place until the WGNP is adopted and the effects monitored, as detailed in Section 6 of this report.

Figure 1: Stages in the SA Process

3. BASELINE INFORMATION

- 3.1. As part of Stage A of this SA process, a review of other plans, programmes, policies, strategies and initiatives that may influence the content of the WGNP was undertaken, together with the collation of extensive baseline data for the Parish. This was presented in the Scoping Report.
- 3.2. The Baseline Data (as outlined in the Scoping Report) is presented below. Where this data has been updated either due to the availability of more recent baseline data, or in response to consultation advice received in response to consultation on the Scoping Report, this is also set out below under each topic.

General Parish Characteristics

- 3.3. West Grinstead Parish is located northwest of Henfield, west of Shermanbury, southwest of Cowfold, south of Southwater and northeast of Ashington. The A24, connecting Worthing with Horsham, runs along part of the western boundary of the Parish, and through the southwest part of it. The northern part of the Parish is bisected by the east-west A272, which connects Billingshurst with Cowfold.
- 3.4. The largest settlement in the Parish is Partridge Green, located toward the southwestern edge of the Parish area. To the north of this are the hamlets of Littleworth and Jolesfield. To the west of these is the hamlet of West Grinstead. Toward the western boundary of the Parish, and a short way to the west of the A24, is the settlement of Dial Post.
- 3.5. It is a predominantly rural Parish that in total extends to some 25.84sqkm (9.98sq miles).
- 3.6. It is bordered to the east by Henfield Parish, Shermanbury Parish and Cowfold Parish; to the north by Nuthurst Parish; to the west by Shipley Parish; and to the south by Wiston Parish and Ashurst Parish. Further to the south is the South Downs National Park, whilst to the north is Horsham, the primary town of the District.

Social Characteristics - Population

- 3.7. The census data from 2011 shows that the total population for the Parish was 3,054. This was a rise of 120 people from 2001. A total of 49.8% (1,523) are male, whilst 50.13% (1,531) are female. The total population represents a density of some 1.18 persons per hectare.
- 3.8. The age structure comprises:

- 653 persons aged between 0-17;
- 898 persons aged between 18-44;
- 1,010 persons aged between 45-64; and
- 493 persons aged 65 and over.

3.9. At the time of the census, there were a total of 1,224 households (at least 1 person occupying at the time of the census). This comprised a mix of:

- 277 x 1-person households;
- 447 x 2-person households;
- 213 x 3-person households;
- 213 x 4-person households;
- 58 x 5-person households;
- 13 x 6-person households;
- 1 x 7-person households; and
- 2 x 8-person households.

3.10. The average household size in the Parish was 2.11 persons.

3.11. Since the publication of the Scoping Report, the Office of National Statistics released “Annual Mid-year Population Estimates for the UK 2014” in June 2015. The official 2014 mid-year estimates, built on the mid-2013 estimate. Results showed a national increase of 491,000 (0.77%) people resident in the UK at 30 June 2014, with Horsham District showing an increase of 1,280 (0.96%) people. No updates were made available for the Parish level.

3.12. Since the 2014 projections, the Office for National Statistics have published further population projections for 2016. This demonstrates the UK population growth rate is slower than in the 2014 based projections. The 2016 based subnational population projections for England, broken down to local authority and health authority level, are scheduled for publication in May/June 2018. Whilst these are not yet available, noting the growth rate is slower, this is likely to have the effect of reducing the overall housing need figure for the period up to 2031.

Social Characteristics - Housing

3.13. At the time of the 2011 census, there were a total of 1,260 dwellings, of which 1,224 were occupied. This comprised:

- Detached dwellings - 537;
- Semi-Detached - 396;
- Terraced - 236
- Flat/Maisonette - 59;
- Flat/Maisonette in converted or shared house - 15;
- Flat/Maisonette in commercial building - 9; and
- Caravan/mobile home - 8.

3.14. Of these 1,224 households, 470 were owned outright; 529 were owned with a mortgage; 2 were in shared ownership, 72 were socially rented; 110 were privately rented; 13 were privately rented through other means; and 28 were rent free.

3.15. The size of the properties were:

- 3 - 1 room;
- 14 - 2 rooms;
- 39 - 3 rooms;
- 150 - 4 rooms;
- 278 - 5 rooms;
- 295 - 6 rooms;
- 156 - 7 rooms;
- 129 - 8 rooms; and
- 160 - 9+ rooms.

3.16. The number of bedrooms in each property were:

- No bedrooms - 2;
- 1 bedroom - 57;
- 2 bedrooms - 239;
- 3 bedrooms - 557;
- 4 bedrooms - 266; and
- 5+ bedrooms - 103.

3.17. Having regard to the comparative value of the properties, they were categorised under the following Council Tax bands (1237):

- Council Tax Band A - 45;
- Council Tax Band B - 51;
- Council Tax Band C - 288;
- Council Tax Band D - 284;
- Council Tax Band E - 247;
- Council Tax Band F - 141;
- Council Tax Band G - 152; and
- Council Tax Band H - 29.

3.18. The census indicated there were a total of 2,283 cars owned by residents within the Parish. Ownership per household was as follows:

- Houses with no cars - 65
- Houses with 1 car - 387;
- Houses with 2 cars - 547;
- Houses with 3 cars - 149; and
- Houses with 4+ cars - 76.

Social Characteristics - Human Health

3.19. Health characteristics are available at District level. These show that overall, the health of the population of people living in Horsham District is better than the England average. Life expectancy for both men and women is higher than the England average. However, there is disparity across the District with life expectancy 5.5 years lower for men and 7.1 years lower for women in the most deprived areas of Horsham, than in the least deprived areas.

3.20. In terms of life expectancy and causes of death, all indices are significantly better than the England average with the exception of infant mortality, which is not significantly different from the England average; and those killed and seriously injured on roads and excess winter deaths, which are significantly worse than the England average.

3.21. In terms of disease and poor health, all indices are better than the England average, with the exception of malignant melanoma, which is not significantly different from the England average.

3.22. In terms of adults' health and lifestyle, all indices are significantly better than the England average, with the exception of excess weight in adults, which is not significantly different from the England average.

3.23. In terms of children and young peoples' health, all indices are significantly better than the England average, with the exception of alcohol-specific hospital stays for the under-18s, which is not significantly different from the England average.

Social Characteristics - Deprivation

3.24. The Index of Multiple Deprivation (IMD) is a composite indicator used to compare deprivation by reference to a wide number of factors, including employment, income, health, education/training, barriers to housing, crime, and living environment. The IMD is expressed as a comparison to the rest of England, and also as a comparison to the rest of Horsham District. IMD's are subdivided into Lower Super Output Areas (LSOAs) and based on a range of indicators which reveal if an LSOA suffers from "multiple" deprivation issues.

3.25. If an area has low overall deprivation, this does not suggest it has no deprivation issues but, that broadly there is not a multiple range of deprivation issues. It is not a measure of wealth, but a measure of deprivation. An area which has low deprivation will not necessarily be a wealthy area, whilst conversely, an area of higher deprivation will not necessarily be a poor

area. The LSOAs are not of uniform size and they cover an area of population, not geographic size.

- 3.26. There were 32,482 LSOAs in England in 2010, with 1 being the most deprived and 32,482 being the least deprived. LSOAs have an approximate population of 1,500 people.
- 3.27. The South East of England contains the second lowest number of the most deprived LSOAs and the highest number of the least deprived LSOAs. West Sussex is one of the least deprived higher level Authorities, being ranked 132nd out of 152 upper tier Authorities. Horsham District is one of the least deprived Districts in England, being the 24th least deprived Local Authority. It contains no LSOAs in the most deprived 30%. Conversely, it contains 44 that are in the least deprived 20%. Of this figure, 17 are in the least deprived 5%.
- 3.28. West Grinstead Parish is covered by three LSOAs. Two of these fall wholly within the Parish, whilst the third covers the entirety of Shermanbury Parish and part of Cowfold Parish.
- 3.29. The first LSOA, located to the southeastern corner of the Parish, contains the majority of Partridge Green and the rural areas to the south of the village. This LSOA has an overall ranking of 3,589, making it in the least deprived 10%.
- 3.30. The second LSOA covers the rural western and central parts of the Parish, including Dial Post; together with a small section that is located immediately to the north of the village of Partridge Green, including Littleworth. This LSOA has an overall ranking of 25,545, making it in the least deprived 25%.
- 3.31. The third LSOA covers the settlement of West Grinstead in the rural northern part of the Parish. As mentioned above, it also includes the entirety of Shermanbury Parish and part of Cowfold Parish. This LSOA has an overall ranking of 21,443, making it in the least deprived 35%.
- 3.32. Whilst there are some disparities between the three LSOAs, these are not significant and show relatively little deprivation relative to the rest of England. The IMD Data for the Parish relative to the District and England is shown on Figure 3.

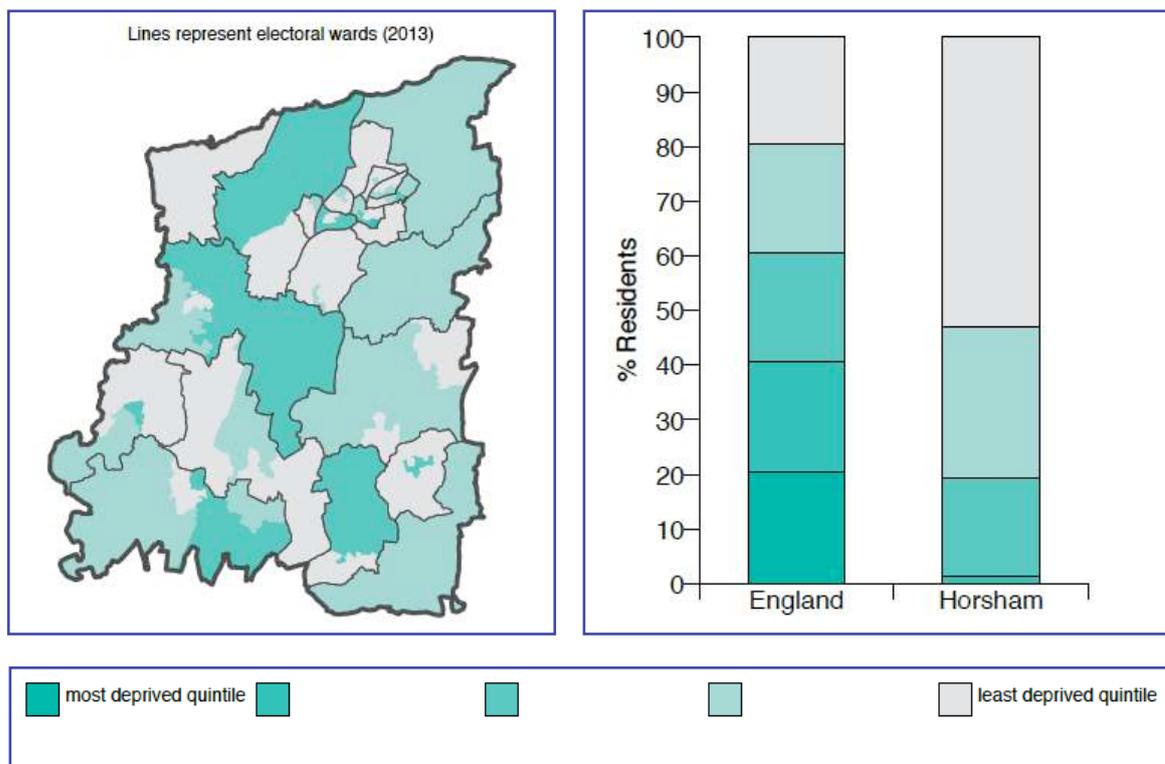


Figure 3: IMD Data for the Parish Relative to the District and England

3.33. The assessment of deprivation for each LSOA is comprised of individual rankings, which are weighted and combined to produce the overall result. Those relating to the three LSOAs that cover the Parish of West Grinstead have the following ranking:

LSOA 1 - Central Partridge Green/Southeast Of Parish

- Income - 30,565 (least deprived 10%);
- Employment - 28,186 (least deprived 15%);
- Health - 26,876 (least deprived 15%);
- Education and Training - 20,679 (least deprived 40%);
- Barriers to Housing/Services - 19,426 (least deprived 45%);
- Crime - 31,736 (least deprived 5%);
- Living environment - 27,755 (least deprived 15%);
- Elderly deprivation - 27,884 (least deprived 15%); and
- Child deprivation - 29,522 (least deprived 10%).

LSOA 2 - West (Including Dial Post) And Central Part Of Parish, Including Area Immediately North Of Partridge Green (Including Littleworth)

- Income - 25,061 (least deprived 25%);
- Employment - 30,828 (least deprived 5%);
- Health - 27,262 (least deprived 20%);
- Education and Training - 27,363 (least deprived 20%);
- Barriers to Housing/Services - 2,485 (most deprived 10%);
- Crime - 28,159 (least deprived 15%);
- Living environment - 23,477 (least deprived 30%);
- Elderly deprivation - 27,777 (least deprived 15%); and
- Child deprivation - 22,772 (least deprived 30%).

LSOA 3 - West Grinstead And North Of The Parish

- Income - 28,242 (least deprived 15%);
- Employment - 29,404 (least deprived 15%);
- Health - 29,723 (least deprived 10%);
- Education and Training - 26,436 (least deprived 20%);
- Barriers to Housing/Services - 721 (most deprived 5%);
- Crime - 25,829 (least deprived 25%);
- Living environment - 10,823 (most deprived 35%);
- Elderly deprivation - 29,239 (least deprived 10%); and
- Child deprivation - 27,421 (least deprived 20%).

- 3.34. The breakdown of the IMD data reveals that overall, the Parish fares very well with regard to most measures of deprivation. There is however, an acute deprivation issue regarding barriers to housing and services. This is likely to be driven by the rural nature of the Parish and its limited number of houses and yet desirability as a location to live. It is for this reason that the most acute deprivation of this category occurs in the most rural, northern part of the Parish. There is also greater deprivation within the category of “Living Environment”, for the northern Parish. This typically relates to quality of dwellings, lack of central heating, air quality and/or traffic accidents.
- 3.35. The Indices of Multiple Deprivation (IMD) update of 30 September 2015 outlined that there were no boundary changes to the LSOA which covers West Grinstead.

Environmental Characteristics - Biodiversity, Flora And Fauna

- 3.36. The District Council commissioned a Landscape Character Assessment, published in October 2003. This identified 32 separate landscape characters across the District. A total of 7 cover the Parish of West Grinstead. The 3 main areas are:
- J3 - Cowfold and Shermanbury Farmlands;
 - J2 - Broadford Bridge to Billingshurst Farmlands; and
 - G4 - Southwater and Shipley Wooded Farmlands.
- 3.37. The 4 smaller character areas comprise:
- P2 - Upper Adur Valleys;
 - O3 - Steyning and Henfield Brooks;
 - M1 - Crabtree and Nuthurst Ridge and Ghyll Farmlands; and
 - G1 - Ashurst and Wiston Wooded Farmlands.
- 3.38. The Cowfold and Shermanbury Farmlands cover the eastern part of the Parish, including the settlements of Partridge Green, Jolesfield and Littleworth. It is a gently undulating area of low ridges and valleys, lying over the Weald clay with the southern edge of the Tunbridge Wells sands. Despite localised visual intrusion from pylons and some urban development, the area generally has an undeveloped rural character. Overall, the landscape condition is considered to be in decline with a moderate sensitivity to change, reflecting the moderate to high inter-visibility of the area and moderate intrinsic landscape qualities. Key sensitivities are defined as large scale farm buildings, suburbanisation on main roads and introduction of telecommunication masts on the low ridges.
- 3.39. The Broadford Bridge to Billingshurst Farmlands cover the southwestern part of the Parish, including the settlement of Dial Post. It is a low lying and relatively flat landscape, becoming more gently undulating towards the southern and northern boundaries. There are scattered small woods and copses, shaws and hedgerows that enclose an intricate pattern of small pastures, although some central and western parts of the area (outside of the Parish) are dominated by larger arable fields where hedgerows have been lost. Individual specimen Oak trees are a feature throughout the area. The area is defined as having a predominantly rural character, except for some suburban influences extending into the countryside near Ashington and around Coolham (outside of the Parish area).
- 3.40. Overall, the landscape condition is considered to be declining, with overall moderate sensitivity to change, reflecting the moderate inter-visibility and moderate intrinsic landscape qualities. Key sensitivities are defined as any large scale housing or commercial development, large scale farm buildings and small scale incremental changes eroding character, such as increase in horse paddocks.

- 3.41. The Southwater and Shipley Wooded Farmlands cover the northern part of the Parish. It is a well wooded landscape, lying on the Weald clay and Horsham stone. The land form gently undulates with small streams and gentle valleys, flowing down towards the Adur. It notes that due to the enclosing presence of woodlands, views are confined. There is a strong parkland influence with the clumps of parkland trees, mixed tree belts and lakes of Knepp Castle and West Grinstead Park, which dominate the landscape. It notes that away from the A24 and A272 roads, the landscape is surprisingly remote and that occasional small farms nestle in the woodlands. The overall landscape condition is considered to be good, with an overall high sensitivity to change, reflecting the area's many intrinsic landscape qualities. It notes there are local areas, such as the A24 corridor, where it is moderate, due to the erosion of character that has already taken place. Key sensitivities are considered to be large scale urban development, and small scale incremental changes, such as expansion of horse paddocks.
- 3.42. The Upper Adur Valleys is a relatively narrow landscape area that cuts through the Parish immediately south of Knepp Castle, heading in an east-west direction before turning south at West Grinstead, to run to the west of the settlement of Partridge Green and Jolesfield. A further small section of this character area lies on the southwestern fringes of the Parish. It comprises the river/stream courses following meandering, locally straightened courses through narrow valleys with gentle sides. They have a generally open character with a few localised concentrations of woodland, including around West Grinstead. It notes there are only a few roads that cross the area, which results in a strongly rural character. Overall, the landscape condition is declining, mainly due to loss of hedgerows on the valley sides from intensive arable agriculture. The overall sensitivity to change is high, due to the mostly unspoilt rural character of the valleys and their relatively high inter-visibility.
- 3.43. The Steyning and Henfield Brooks is an area that runs along the southeastern fringes of the Parish, comprising the middle reaches of the River Adur and its alluvial flood plain. This defines the landscape type, with its mostly gentle Weald clay valley sides. The open flood plain is mainly pastoral, with cattle grazing, but with some arable farmland at the edges. The small fields are divided by winding and straight ditches and are sometimes punctuated by stunted Hawthorn trees and bushes. The landscape can take on a strong seasonal character, with winter bringing dramatic flooding and lingering mists. Small historic farmsteads are sometimes prominent on lower slopes and projecting spurs. Overall, the condition is declining, due to loss of hedgerows on the valley sides and extension of arable farmland at the edge of the flood plain and visual intrusion from pylons. The overall sensitivity to change is high, due to the openness of the area and its many intrinsic landscape qualities. Key sensitivities are built development on the valley floor, large scale and high density development on valley sides, cumulative impact of vertical structures, drainage of flood meadows for arable farmland, engineered flood defence structures and localised intrusion from modern farm buildings.
- 3.44. The Crabtree and Nuthurst Ridge and Ghyll Farmlands cover a small area at the northeastern edge of the Parish. The overall character area is a well wooded and enclosed landscape of steep wooded ridges and ghylls, as well as small valleys situated on the Tunbridge Wells sand. The relief becomes slightly more subdued towards the west of the character area, with transition to the Low Weald. It has a strong network of small to large sized woods, shaws and hedgerows, which enclose mainly small pasture fields. As a result, views are generally very confined, although there are occasionally long views over the undulating ridges. Farmland,

ponds, hedgerow, oaks and steep winding lanes are a distinctive feature. Despite some localised suburban pressures, the area retains a strong rural unspoilt character. Overall, the landscape condition is good, although there are localised areas where it is declining due to the loss of hedgerows. Overall, the sensitivity to change is high, due to the many landscape qualities of the area and locally visually prominent topography. Key sensitivities are any large scale housing development, incremental improvements to the character of the minor roads, suburbanisation and changes in traditional land management.

- 3.45. The Ashurst and Wiston Wooded Farmlands occupy a very small pocket of the far southwestern corner of the Parish. The area predominantly lies to the south of the Parish, between Ashington and Ashurst. It is a strongly wooded landscape on gently undulating Weald clays, lower green sand and gault clay. Many small fields of pasture are enclosed by frequent woodlands, hedgerows/shaws and hedgerow trees. Views are mostly confined, but with occasional views to the chalk escarpment. The area is crossed by only a few minor roads and it has a rural and remote character. Overall, the landscape condition is good, although there have been localised losses of hedgerows. Overall, the sensitivity to change is high as, although an enclosed landscape, without prominent topography and little existing development, many types of change could damage or erode its unspoilt, remote, rural character.
- 3.46. More recently, the District Council have commissioned a Landscape Capacity Assessment. The final report of this was published in April 2014. This is not a Landscape Character Assessment, but rather a Landscape Capacity Assessment. As noted in Paragraph 1.6 of the final report, the key objectives are to provide an assessment of the landscape capacity of the land around existing Category 1 and Category 2 settlements¹, to accommodate housing and employment development, and identify areas where new development could best be accommodated without unacceptable adverse landscape and visual impacts. It is pertinent to note that, as such, this assessment had regard only to land immediately around the periphery of the settlement of Partridge Green. This is a Category 2 settlement and the only categorised settlement within the Parish. Paragraph 1.7 of the report sought to emphasise that the scope of the study was to assess landscape capacity only and that the overall suitability of the site for development would depend on a range of other considerations, noted as including access, infrastructure, constraints, other environmental considerations including flood risk, ecology, heritage and archaeology and air quality.
- 3.47. The study considered that there were no strong physical boundaries to development around Partridge Green and therefore, all of the countryside around the settlement had been included within the assessment. It was noted that overall, the landscape is gently undulating and comprises a mix of smaller and larger scale fields with some scattered woodlands, and to the south of the village, the course of the River Adur, which has narrow valleys with gentle sides. It noted there were four distinctive landscape study areas identified.
- 3.48. Landscape Study Area PG1 relates to the northern periphery of the settlement. The report notes that whilst some landscape features and qualities in this area are sensitive to housing development, the mostly moderate visual sensitivity of the area and moderate landscape value results in an assessment of moderate capacity for small scale housing development. It notes that it would be very important to minimise any adverse impact from loss of hedgerows to

¹ As defined in the Horsham Local Development Framework Core Strategy

development, to avoid the impression of urban sprawl into the area and to relate any development closely to the existing settlement edge.

3.49. Landscape Study Area PG2 relates to the southeast periphery of the settlement. The request notes that although this landscape is assessed as being of low-moderate value, many of the landscape features and qualities are sensitive to housing development and this, coupled with a moderate-high visual sensitivity, results in an assessment of only low-moderate capacity for small scale housing development. It notes that if there were to be any development in this area, it would need to be closely related to the existing settlement edge and demonstrate it would not have wider adverse visual impacts.

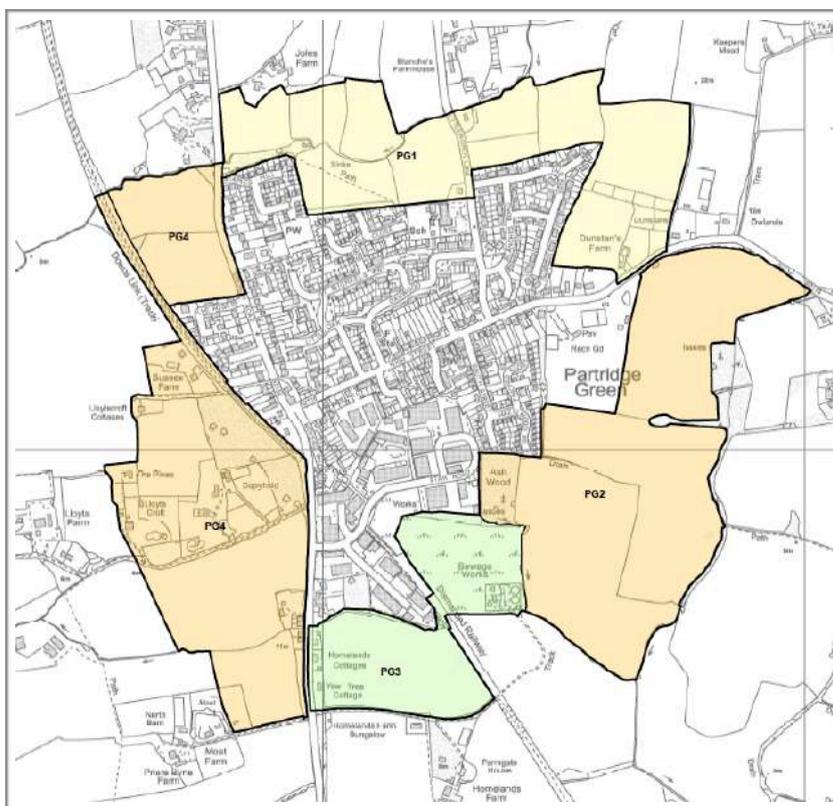


Figure 4: Landscape Capacity around Partridge Green.

3.50. Landscape Study Area PG3 relates to the southern periphery of the settlement, south of the Star Road Industrial Estate. The report notes that in this area, the landscape is in poor to moderate condition and the existing urbanising influences, and the relatively low visual sensitivity and landscape value of the area is assessed as having a moderate-high capacity for small scale housing development. It notes that it would be important to ensure that there are no resulting adverse visual impacts on open countryside to the south, so a strong, effective landscape buffer would be needed.

3.51. Landscape Study Area PG4 relates to the western periphery of the settlement. The report notes that this area has a moderate-high landscape character sensitivity, with many landscape features and qualities sensitive to housing development. Together with the moderate landscape value, it is considered there is only low-moderate capacity for small scale housing development. It notes that development in the west of the area would create the appearance of any development as an incursion into the countryside. It notes the larger open field to the south of the area would be more visually sensitive, but there may be some capacity in the two fields between Church Road and the Downs Link.

- 3.51. In response to consultation on the Scoping Report, Natural England supported Objective 1 to preserve the rural character of the Parish and Objective 2 to protect and enhance biodiversity.
- 3.52. Natural England advised the Report could also make reference to the high number of individual veteran trees in the area. They further advised that the indicators for Objective 2 - Ecology should make clear whether SSSI in adjacent Parishes will be used for this monitoring and, if so, which ones. Where SSSI's in adjacent Parishes are not to be used, reference to SSSI should be removed to avoid confusion.
- 3.53. Natural England also welcomed Objective 5 which aims to reduce carbon impact and prepare for impacts of climate change. However, they recommended it should be noted that, as the area falls within the buffer zones for both the South Downs National Park and High Weald AONB, landscape impacts need to be considered for any large-scale alternative energy initiatives, such as solar arrays and windfarms.

Environmental Characteristics - Heritage Assets

- 3.54. There are numerous Listed Buildings distributed throughout the Parish. These include a collection of five Listed Buildings within the designated West Grinstead Conservation Area, including St George's Church (Grade I listed) and Glebe House (Grade II* listed) (see Figure 4). There are a further 2 Grade II* listed buildings within the Parish; namely Old Lock Farmhouse (located southwest of Partridge Green) and the Priest's House, a short way to the northwest of West Grinstead Conservation Area.
- 3.55. There is a cluster of 8 Listed Buildings at Park Farm, located a short way to the east of the A24 and south of the A272. Littleworth has a collection of 10 Listed Buildings within its environs, whilst Dial Post has 4. There is a grouping of 4 Listed Buildings south of Partridge Green, on Church Road.
- 3.56. There is also one Scheduled Ancient Monument within the Parish, located at West Grinstead Park, together with a second Scheduled Ancient Monument, located outside, but adjacent to the western boundary of the Parish, on the west side of the A24 in Shipley Parish, known as Knepp Castle.
- 3.57. Historic England did not provide a response to the consultation on the Scoping Report.

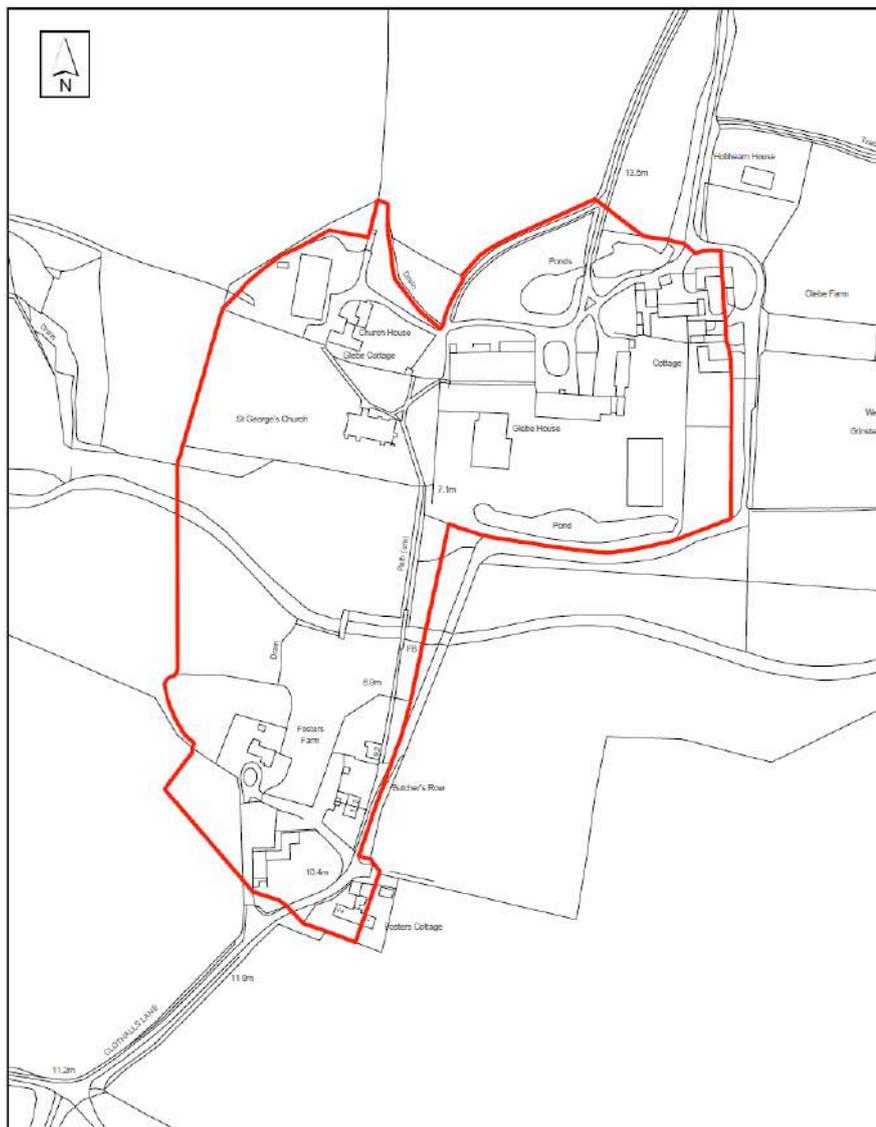


Figure 5: West Grinstead Conservation Area

Environmental Characteristics - Air Quality And Climate

- 3.58. Air quality within the Parish is generally very good, reflecting its relatively low population and rural nature. There are no Air Quality Management Areas (AQMA) within the Parish. There are 2 known Air Quality Management Areas within the wider District; the first at the A272 High Street at Cowfold, to the northeast of the Parish; and the second at the A283 High Street/Manleys Hill in Storrington (to the southwest).
- 3.59. The climate of the Parish, which falls to the north of the South Downs, is generally temperate. Average temperatures in January vary from an average low of 3 degrees Centigrade to an average high of 8 degrees, which increases to a peak in July and August, where the average low is 14 degrees and the average high is 21 degrees. Rainfall is relatively consistent throughout the year, with circa 10 average rain days per month. Peak rainfall is in October and November, at circa 50mm for the month, with a low in June of just under 20mm.

Environmental Characteristics - Water And Flooding

- 3.60. There are a number of watercourses that run through the Parish. These principally comprise the upper and lower reaches of the River Adur and its associated tributaries. They typically flow through the Parish in a generally southerly direction. These include the part of the River Adur which flows in an easterly direction, immediately south of Knepp Castle, and south of West Grinstead, before turning south to flow to the west of Jolesfield and Partridge Green; together with that part of the River Adur which runs along the southeastern boundary of the Parish, where the two courses combine to create a single main river body, which then runs south to the west of Henfield. The Environment Agency indicative Flood Maps and the District Council's Strategic Flood Risk Assessment identify these two watercourses and their margins as within Flood Zones 2 and 3. This includes a low lying area of ground to the southeast of the built-up area of Partridge Green, as well as around the watercourse, which lies to the west of the village. This reinforces that this part of the Parish has a flat topography and in part is formed of Weald clay geology.
- 3.61. The Environment Agency recommended an objective is included to protect and enhance the environment and advised indicators should relate to the environmental constraints. They also recommended the SEA takes account of relevant policies, plans and strategies including Horsham's Strategic Flood Risk Assessment, flood risk strategies and the South East River Basin Management Plan. The Environment Agency also shared a checklist for Neighbourhood Plans covering Horsham District which included general advice relating to flood risk, water management and infrastructure delivery.
- 3.62. This additional information has been added to the baseline information that has informed the preparation of the WGNP and the accompanying SA.

Economic Characteristic - Employment

3.63. The 2011 Census reveals that the number of residents of working age (16-74) was 2,305. Of this figure, 1,686 (73.15%) were economically active, with 619 (26.85%) economically inactive. The census also revealed the split in roles as follows:

- 362 - employed part time;
- 884 - employed full time;
- 376 - self employed;
- 57 - unemployed; and
- 72 - economically active full time students.

3.64. Those who were economically active indicated their jobs were as follows:

- Manager, Director, senior officials - 277;
- Professional occupations - 281;
- Associate professional and technical occupations - 230;
- Admin and Secretarial occupations - 184;
- Skilled traders - 224;
- Caring, Leisure and Service - 159;
- Sales and Customer Service - 110;
- Process, Plant and Machine Operatives - 77; and
- Elementary occupations - 144.

3.65. Those who were economically inactive indicated they were:

- Retired - 321;
- Looked after the family/home - 105;
- Long term sick/disabled - 34;
- Economically inactive full time students - 67; and
- Economically inactive for other reasons - 27.

3.66. A total of 2,488 residents were aged 16 and over and indicated their qualifications were as follows:

- No qualifications - 356;
- Highest qualification Level 1 (CSE/O Level/GCSE) - 333;
- Highest qualification Level 2 (5 or more GCSEs/1 A Level) - 498;
- Highest qualification Apprenticeship - 118;
- Highest qualification Level 3 and 4 (2+ A Levels/Degree/Masters/Top NVQ Grade/Top Diplomas/BTEC National/Professional Qualifications) - 1,001; and
- Other qualifications - 82.

- 3.67. The Parish has two significant employment centres, both located within Partridge Green. These are the Huffwood Trading Estate, located on the south side of the High Street; and the Star Road Industrial Estate, which is located to the south of this and accessed off the B2135. These provide significant employment floor space and job opportunities in a range of employment types.
- 3.68. Elsewhere, economically active residents either commute out of the Parish to work, work from home, or have a land use based profession within the immediate locality.

Economic Characteristic - Material Assets

- 3.69. Whilst the Parish is rural, it nonetheless benefits from a range of material assets.
- 3.70. The largest settlement is Partridge Green, which benefits from a primary school, pre-school childcare facilities, village hall, church, retail provision, including Post Office, restaurant and takeaway, petrol filling station, MOT centre, fire station, veterinary surgeon, two branch doctors' surgeries, Public Houses, together with a recreation ground incorporating cricket pitch, football pitch, sports pavilion, equipped children's play space and tennis courts.
- 3.71. Dial Post is much smaller in size, and benefits from a village hall - completed in early 2010 - public house, and public open space.
- 3.72. Within and around West Grinstead is a restaurant, retail facility and two churches.
- 3.73. A short way to the south of Dial Post, and on the east side of the A24, is a large retail outlet, known as Old Barn, and further to the south of this is the Honeybridge Caravan Park.
- 3.74. The Downs Link runs through the Parish from north to south, passing by, and through the edge of Partridge Green. This is a bridleway constructed on a former railway line that links to the wider public footpath network.
- 3.75. The Parish also benefits from a wide range of sports and leisure clubs and societies. These include badminton, football, netball, stoolball, tennis, bowls club, kick boxing, dance classes and keep-fit groups. Youth groups, include Brownies, Guides and Scouts, as well as a youth club. There are also church related organisations, choirs, bell ringing, bingo club, WI groups,

horticultural societies, craft clubs, Young Farmers, Jolesfield Allotment Association and Residents Associations. A number of annual events also take place in the Parish, including open gardens, carol services, countryside festival, flower shows and village fête.

Updated Review Of Other Plans, Programmes, Policies, Strategies And Initiatives That May Influence The Content Of The West Grinstead Neighbourhood Plan

- 3.76. In response to the consultation on the Scoping Report additional documents have needed to be added to the list of Background Documents that have influenced the content of the WGNP.
- 3.77. Since consultation on the Scoping Report (December 2014), the HDPF has undergone Examination and was adopted by the Council in November 2015 and forms part of the Development Plan for the District.
- 3.78. As a result of a successful Judicial Review, the Government amended the National Planning Practice Guidance on 1 August 2015, removing all references to thresholds in relation to affordable housing and infrastructure contributions as well as the vacant building credit.
- 3.79. On Wednesday 11th May 2016 the Court of Appeal allowed the Government's appeal on all four grounds against the judgment in West Berkshire District Council and Reading Borough Council v Secretary of State for Communities and Local Government.
- 3.80. The Court of Appeal held that the national planning policy on minimum thresholds for affordable housing, and on the vacant building credit, was lawfully made when promulgated by Written Ministerial Statement in November 2014, and within amendments to the PPG early in 2015.
- 3.81. The Government, on the 06 March 2018, published a consultation on the revised NPPF which includes a standard methodology for calculating housing need. The draft revised National Planning Policy Framework incorporates policy proposals previously consulted on in the Housing White Paper and the Planning for the right homes in the right places consultation. Consultation was open until 10 May 2018.
- 3.82. The revised National Planning Policy Framework (NPPF) was published in July 2018 and more recently on 19 February 2019. It sets out the the Government's planning policies for England and how these are expected to be applied. It replaces the previous NPPF published in March 2012, and revised in July 2018.
- 3.83. With respect to calculating housing needs it introduced a standard methodology. In addition, it gave clear direction that Local Planning Authorities should also set out a housing requirement for designated Neighbourhood Plans.
- 3.84. With respect to the provision of housing at a Local Plan level, the NPPF advises:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for

designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.”²

3.85. Furthermore it states:

“Where it is not possible to provide a requirement figure for a neighbourhood area⁷, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”³

3.86. The Housing Delivery Test is an annual measurement of housing delivery in the area of relevant plan making Authorities. The results for Horsham have been published in February 2019 and February 2020.

Challenges Facing West Grinstead Parish

3.86. The baseline information and plans, programmes, policies, strategies, guidance and initiatives help to determine the sustainability issues and challenges facing the Parish. Whilst the Parish generally offers a high quality of life, it will need to manage a number of issues over its lifetime in order to ensure the area continues to be successful and the negative impacts of development are properly mitigated. These challenges include:

- Preserving the rural character of the Parish;
- Protecting the Parish’s heritage assets;
- Preventing coalescence between Partridge Green, Jolesfield and Littleworth; and
- Retaining and supporting local businesses.

² Paragraph 65 of the NPPF, February 2019

³ Paragraph 66 of the NPPF, February 2019

4. SUSTAINABILITY FRAMEWORK - OBJECTIVES AND INDICATORS

- 4.1. This SA seeks to test the contribution the WGNP will make towards achieving sustainable development, through the identification of a number of objectives and indicators, known as the Sustainability Framework. These are used to judge the sustainability impacts of the policies within the plan. The objectives are based on the three strands of sustainability; i.e. social, economic and environmental. The indicators are chosen to quantify and measure the achievement of each objective. The Sustainability Framework 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.
- 4.2. The Sustainability Framework was the subject of consultation at the Scoping Report stage. The Sustainability Objectives and their corresponding indicators are set out below. Colour coding of the objectives is provided to indicate which relate to environmental; social or economic.

Environmental Objective
Social Objective
Economic Objective

Environmental - Objective 1 - Countryside: To conserve and enhance the rural character of the Parish.
<ul style="list-style-type: none"> • Number of new residential dwellings approved within the Parish beyond the defined settlement boundaries and areas allocated for development. • Quantum of new employment floor space approved within the Parish beyond defined settlement boundaries and areas allocated for development.

Environmental - Objective 2 - Ecology: To protect and enhance the biodiversity of the Parish.
<ul style="list-style-type: none"> • Extent of the Ancient and Semi-Natural Woodland within the Parish. • Quality and condition of local watercourses.

Environmental - Objective 3 - Heritage Assets: To protect and enhance the heritage assets of the Parish.

- Number and condition of Listed Buildings.
- Number of heritage assets and their setting protected as part of development.
- Number of buildings on the “at risk” register.
- Number and condition of Scheduled Ancient Monuments.

Environmental - Objective 4 - Water & Flooding: To ensure development does not take place in areas at risk of flooding or where it may cause flooding elsewhere.

- Number of properties at risk of flooding, as defined by the Environment Agency.
- Number of permissions granted in areas at risk of flooding.
- Number of permissions granted against the advice of the Environment Agency.

Environmental - Objective 5 - Climate Change: To reduce the Parish’s impact on climate change and prepare the community and environment for its impacts.

- Number of green energy developments and installations approved in the Parish.
- Number of developments built to exceed standard Building Regulation requirements.
- Number of households within a 10 minute walk of a bus stop with a service of a frequency of 1 hour or more during the working day.

Social - Objective 6 - Transport: Improve highway safety.

- Police accident data.
- Number of highway safety schemes delivered within the Parish.

Social - Objective 7 - Housing: To enable those with identified local housing needs to have the opportunity to live in an affordable home.

- Number of new home completions.
- Number of affordable dwelling completions.
- Number registered on the Council’s housing waiting list wishing to live in the Parish.

Social - Objective 8 - Crime: To ensure residents live in a safe environment.

- Overall crime rates.
- Number of domestic burglaries.

Social - Objective 9 - Sustainable Transport Patterns: To increase the opportunities for residents and visitors to travel by sustainable and non-car modes of transport.

- Quantum of money spent in the Parish on cycle, footway and public transport network.
- Number of new sustainable and public transport facilities provided in the Parish, such as bus shelters, cycle lanes, pedestrian crossings, etc.
- Bus service provision.
- Number of households within a 10 minute walk of (approximately 800m) a bus stop with a frequency of more than 1 per hour during the working day.

Social - Objective 10 - Community Infrastructure: To maintain and enhance the community infrastructure within the Parish.

- Extent and condition of community infrastructure facilities in the Parish.
- Quantum of Section 106/Community Infrastructure Levy (CIL) monies secured to contribute to community infrastructure provision in the Parish.
- Number of households within a 10 minute walk (approximately 800m) of public recreational space.
- Quantum of Section 106/Community Infrastructure Levy (CIL) monies secured to contribute to community infrastructure provision in the Parish.

Economic - Objective 11 - Economy: To maintain and enhance employment opportunity and provision within the Parish.

- Levels of unemployment within the Parish.
- Total amount of employment floor space created in the Parish.
- Amount of employment floor space lost to other uses in the Parish.

Economic - Objective 12 - Wealth: To ensure high and stable levels of employment and address disparities in employment opportunities in the Parish so residents can benefit from economic growth.
<ul style="list-style-type: none"> • Indices of Multiple Deprivation. • Percentage of residents who are unemployed. • Percentage of residents who are economically active.

Economic - Objective 13 - Retail: To encourage the retention and development of retail floor space within the Parish, in accordance with the local needs of the settlement.
<ul style="list-style-type: none"> • Total amount of retail floor space created in the Parish; • Amount of retail floor space lost to other uses in the Parish; • Number of households within a 10 minute walk (approximately 800m) from retail facilities.

- 4.3. The WGNP sets out a number of strategic objectives. These are important as they state what the Plan is aiming to achieve through its overall strategy and accompanying policies. The strategic policies have been chosen in order to help solve, or mitigate as many of the issues and challenges for the Parish as possible through the planning system.
- 4.4. The following reflect the Strategic Objectives of the WGNP.

Strategic Objectives of the West Grinstead Neighbourhood Plan	
1	Protect and enhance the rural character of the Parish.
2	Maintain the separate identities of the settlements of Partridge Green, Littleworth and Jolesfield.
3	Ensure new development is not built in areas at risk of flooding.
4	Foster community cohesion.
5	Support and sustain economic development.
6	Support retention of local services.

Figure 6: Strategic Objectives of the WGNP

- 4.5. These have been assessed for compatibility with the 13 Sustainability Objectives, as detailed below:.

		WGNP Objectives					
		1	2	3	4	5	6
	1	✓	✓	✓	✗	0	0
	2	✓	✓	✓	✗	0	0
	3	✓	✓	0	✗	0	0
	4	✓	0	✓	0	0	0
	5	✓	0	✓	✗	0	0
	6	0	0	0	0	0	✓
	7	✗	0	✓	✓	✓	✓
	8	0	0	0	✓	0	0
	9	0	0	0	0	0	✓
	10	0	0	0	✓	✓	✓
	11	0	0	0	0	0	✓
	12	0	0	0	0	0	✓
	13	0	0	0	0	0	✓

KEY	
✓	Compatible
✗	Incompatible
0	No link/Neutral

Figure 7: Assessment of WGNP Objectives and SA Objectives

- 4.6. The table demonstrates that most of the Neighbourhood Plan Objectives and Sustainability Objectives are compatible or have a neutral impact. This indicates that the WGNP is being prepared positively with the aim of solving some of the sustainability issues identified and that Sustainability Objectives are appropriate to measure the extent to which it does.
- 4.7. The areas of incompatibility are generally where WGNP objectives for economic growth are in conflict with the environmental sustainability; and conversely where the WGNP objectives to preserve the rural character of the Parish and maintain gaps between settlements conflict with social and environmental sustainability objectives. In such situations, an appropriate balance must be struck between the need for growth and the benefits this brings, with the negative impact this may have on environmental objectives.
- 4.8. A comparative assessment has been undertaken of the policies to test their mutual compatibility. This is shown in the table below. This confirms that most policies are either compatible, or have a neutral impact.

2	✓									
3	✓	✓								
4	✓	✓	✓							
5	0	✓	✓	0						
6	0	0	0	0	0					
7	0	0	0	0	0	0				
8	✗	✗	0	✗	0	✓	✓			
9	0	0	0	0	0	✓	0	✓		
10	0	0	0	0	✓	0	✓	✓	✓	
	1	2	3	4	5	6	7	8	9	

✓	Compatible
✗	Incompatible
0	No link/ neutral

Figure 8: Assessment of Policy Options

5. APPRAISAL OF THE WEST GRINSTEAD POLICY OPTIONS AGAINST THE SUSTAINABILITY FRAMEWORK

- 5.1. In preparing the WGNP a range of policy areas have been considered and a range of options for each policy have been identified. These have been prepared based on the review of other relevant plans, programmes, policies, strategies and initiatives, the extensive baseline data for the Parish, and the overarching strategic objectives of the WGNP.

Policy Appraisal

- 5.2. All policy options have been appraised, to assess the impact on the 13 Sustainability Objectives set out in the Sustainability Framework. These appraisals are set out in the tables attached at Appendix 1. The overall appraisal ensures that the policies selected and taken forward in the WGNP are the most sustainable, given all reasonable alternatives.
- 5.3. Whilst a number of the individual policies may have a negative impact, particularly on a specific small number of objectives, overall the policies in the WGNP taken as a whole will have a significant positive impact on the sustainability of the Parish.
- 5.4. Furthermore, the negative impacts have been positively mitigated, as far as reasonably possible. It is not considered that the cumulative in combination effects will be significant.
- 5.5. The table attached at Appendix 1 demonstrates the overall positive impact of the selected policy option on the social, economic and environmental objectives.
- 5.6. Overall, it is considered that the WGNP will have positive effects on environmental, social and economic indicators, and will promote sustainable development. It is not considered the Neighbourhood Plan will have significant detrimental effects, including secondary or indirect effects, cumulative effects, or synergistic effects.

Aim 2: North And South Of Star Road

- 5.7. During the preparation of the WGNP, the NPPF was updated to include a standard methodology to calculating housing needs. In addition, it gave clear direction that Local Planning Authorities should also set out a housing requirement for designated neighbourhood plans.
- 5.8. In light of this, WGPC requested an 'indicative figure from HDC in August 2018 in order to inform plan preparation. This was provided in November 2018.
- 5.9. HDC advised of the expectation that best endeavours are made to accommodate the "indicative figures" in accordance with the Development Plan. The "indicative figure" was derived from key data sources comprising Local Plan derived figure; Strategic Housing Market Area derived figure; and Housing Needs Register derived figures. The indicative figure for Partridge Green was identified at 110 dwellings.
- 5.10. Following receipt of the "indicative figure" the NPWG considered how best to facilitate the identified housing figure within the WGNP. The NPWG considered Options available to progress the WGNP at their meeting on 14 February 2019. The options considered comprised:

1. Go forward with a proposal to facilitate 60-70 residential units in the WGNP. Include a proposal for an early review in 2021 when HDC's current review of the HDPF is likely to be adopted and therefore the numbers to be allocated to Parishes finalised.
 2. Use the indicative number of 110 dwellings and allocate a further site (in addition to Huffwood Trading Estate).
 3. Move forward to Regulation 14 Pre-submission WGNP without proposing site(s) for residential development and allow HDC to bring forward site allocations in the HDC Local Plan.
 4. Move forward to Regulation 14 Pre-submission consultation with a Plan which does not allocate sites but which has a strategy policy for residential sites and site allocations which would be incorporated into the Plan in 2021.
- 5.11. Following consideration and discussion of the above, the NPWG agreed Option 1 and Option 4 should be explored further with HDC. A meeting was therefore held with HDC on 01 April 2019 to discuss the preferred options of the NPWG.
- 5.12. In light of discussions with HDC, it was agreed the WGNP should proceed without site allocation(s) and instead set out a 'Community Aim' to encourage the commercial land use at Huffwood to relocate to Land south of Star Road in order to facilitate residential development at the site.
- 5.13. HDC have asked WGPC to confirm their commitment to undertake a review of the WGNP in 2021 in order to take account of any revised housing numbers which are allocated to the Parish in the Local Plan Review. WGPC have confirmed agreement to this approach and are committed to a review in 2021.
- 5.14. The WGNP was prepared on this basis.
- 5.15. Appendix 1 includes an appraisal of Aim 2: Land north and south of Star Road. The Appraisal sets out two Options:
- Option A: To have a 'Community Aim' to support the relocation of commercial land use from land north of Star Road to Land south of Star Road, enabling residential redevelopment of Huffwood.
 - Option B: To not have a 'Community Aim' and rely on the National Planning Policy Framework and policies of the Horsham District Planning Framework.
- 5.16. The Appraisal confirms Option A supports the relocation of commercial floorspace on currently undeveloped land to the south and east of the current commercial land uses, to, in turn, enable residential redevelopment of the existing Huffwood Industrial Estate. Integral to this option is ensuring no net loss of employment floorspace. This together with the likely delivery of enhanced quality new employment floorspace scores positively on the relevant economic objectives. Relocation of commercial traffic away from the High Street would be likely to positively impact highway safety, and together with the proximity of new residential development to the key services and facilities of the village would score positively relevant objectives. The delivery of new housing would also score positively.

- 5.17. Set against this, the new commercial floorspace would be located on a greenfield site, close to Ash Wood, a designated 'Ancient and Semi-Natural Woodland.' As a result, this option would score negatively against these environmental objectives.
- 5.18. Option B would rely on higher tier policies. This includes the HDPF which identifies Huffwood for protection and retention of business uses, as a Key Employment Area. As such reliance on higher tier policies would support retention, and if necessary, future commercial development on the Huffwood site. This would score positively on the relevant economic objectives. It would however not score positively on a number of other objectives, for example in relation to highway safety and housing. This option would however not result in a negative impact on a number of environmental objectives.
- 5.19. Overall, Option A delivers most positive benefits, in particular in relation to economic and social objectives, and these outweigh the negative impacts.

Regulation 14 Pre-Submission Consultation

- 5.20. In response to the Regulation 14 Pre-submission Consultation of the WGNP, SIGMA Planning on behalf of Rydon, raised concerns with the:
- Lack of a Sustainability Appraisal of the four options detailed in the housing chapter (Para 6.9 of the Pre-submission WGNP); and
 - Sustainability Appraisal of Aim 2: Land north and south of Star Road.
- 5.21. The representations state HDC provided WGPC with an indicative housing requirement of 110 dwellings for the village. Whilst 4 options were considered by the NPWG.
- 5.22. Representations assert the selection of Option 4 is not explained or justified. Representations state there is no sustainability appraisal of the 4 options and this is a significant flaw in the methodology of the Plan preparation.
- 5.23. The submissions state that this undermines the soundness of the Plan on the basis that the advantages of complying with Government policy to deliver housing to meet needs as quickly as possible has not been properly recognised or assessed.
- 5.24. The representations submit that Option 2 is in closest conformity with Government Policy, in that it positively aims to deliver, without delay the housing requirement that is expected to be provided in the NP area and accords with the adopted Local Plan. The submissions state that Option 2 is the most sustainable option and is the only option that would be consistent with national and Development Plan policy.
- 5.25. With respect to Aim 2, the submission state the appraisal upon which the SA is based asserts that there are economic and social benefits that outweigh the negative impact. It is considered those assumptions are *'illusory and not based upon proper analysis and evidence'*.
- 5.26. The submission state that it is assumed that there will be no net loss of employment floor-space. The submissions state that this is not the correct test and the correct test is *"how many of the existing businesses are willing and able to move from Huffwood?"*.

- 5.27. The submissions state that there has been no assessment of what happens if only part of the Huffwood Trading Estate is cleared and the aim is frustrated or delayed as a result.
- 5.28. The submissions state that the significant positive attributed to Option A in the SA is not justified by a replacement of existing floor-space, unless it can be demonstrated the business performance of the existing business is likely to be significantly improved as a result of a move to new premises.
- 5.29. The submissions state that the example of existing businesses that have chosen to stay at Huffwood rather than move to new premises which are available at Star Road or elsewhere suggests that *“they do not see this as a wise economic move for them”*. The representations assert that *“these uncertainties should give rise to a greater positive impact for the status quo rather than supporting a hypothetical gain”*.

Response To Sigma

- 5.30. As set out in the WGNP, an indicative housing number was requested and received from HDC in November 2018. In providing such, HDC advised WGPC would be expected to make *“best endeavours to accommodate the number applying reasonable assumptions consistent with the principles of sustainable development to deliver the number in its entirety”*.
- 5.31. In light of this, the NPWG considered how best to facilitate the delivery of the identified housing figure in the WGNP. A meeting was held in February 2018 to explore and discuss options on how best to process the WGNP. The Option considered comprised:
1. Go forward with a proposal to facilitate 60-70 residential units in the WGNP. Include a proposal for an early review in 2021 when HDC's current review of the HDPF is likely to be adopted and therefore the numbers to be allocated to Parishes finalised.
 2. Use the indicative number of 110 dwellings and allocate a further site (in addition to Huffwood Trading Estate).
 3. Move forward to Regulation 14 Pre-submission WGNP without proposing site(s) for residential development and allow HDC to bring forward site allocations in the HDC Local Plan.
 4. Move forward to Regulation 14 Pre-submission consultation with a Plan which does not allocate sites but which has a strategy policy for residential sites and site allocations which would be incorporated into the Plan in 2021.
- 5.32. Subsequently in March 2019, HDC asked all Parish Councils (who were preparing Neighbourhood Plans) to confirm how they wish to proceed with the preparation of their Neighbourhood Plans. For those, at an early stage in plan preparation, HDC advised 2 options were available. Options comprised:
1. Place the neighbourhood plan preparation process 'on hold' and then restart the process of plan preparation to take account of housing number which are allocated to the parish in the Local Plan Review. Any review of the Neighbourhood Plan would be retried to recognise the step-change in housing growth required for the area.
 2. HDC meets housing needs for the parish through the Local Plan process. Parish level needs

would be met in consultation with the local community.

- 5.33. Where Parish Councils wished to proceed with Neighbourhood Plans, correspondence made clear HDC would take a view on the deadline by which Neighbourhood Plans would need to be formally submitted by in order to proceed to Examination. Subsequent advice from HDC indicated submission would be required by Summer 2019. The deadline was later extended to the end of Autumn 2019.
- 5.34. In light of HDC's position, the NPWG agreed, Option 1 and Option 4 of the above plan making options should be explored further with HDC. A meeting to discuss such took places on 01 April 2019.
- 5.35. At this meeting, HDC confirmed they would support Option 4. Integral to this, HDC confirmed WGPC would be expected to commit to: progressing a neighbourhood plan (without sites) with the aim of the adoption at the end of 2019; and a review of the WGNP following the adoption of the new Local Plan, which is anticipated to be in 2021. The WGNP was subsequently prepared on this basis.
- 5.36. As set out in national planning policy guidance, there is no legal requirement for a neighbourhood plan to have a sustainability appraisal.⁴ Guidance states qualifying bodies may however find this a useful approach for demonstrating how their draft plan or order meets the basic condition.
- 5.37. In light of the proposed approach of the WGNP and national planing policy guidance, confirmation was sought from HDC on how best to meet the requirements of the Basic Conditions with respect to SA/Strategic Environment Assessment requirements. In response HDC confirmed that in the absence of any proposed site allocations , an SEA would not be required, however they considered an SA would be advisable.
- 5.38. In the interest of robustness and given Government guidance in relation to incorporating the SEA process into the SA, an SA incorporating an SEA has been prepared. For simplification, this report is referred to as a SA, although it incorporates the SEA.
- 5.39. The SA that accompanies the WGNP sets out, an appraisal of the WGNP policy options against the Sustainability Framework. It notes that in preparing the WGNP a range of policy areas and aims have been considered, and a range of options for each policy and aim have been identified and considered.
- 5.40. The work undertaken is in accordance with the Government's Practical Guide to the Strategic Environmental Assessment (SEA) Directive. Stage B relates to developing and refining alternatives and assessing effects.
- 5.41. B2 sets out the approach to developing strategic alternatives. This makes clear that there is a requirement to appraise the likely significant environmental effects of implementing the Plan or programme "and any reasonable alternatives". It notes that "alternatives considered often includes scenarios termed "no Plan or programme" and "business as usual". It notes that more detail in this is given in Appendix 6 of the document. That makes clear that in identifying alternatives "only reasonable, realistic and relevant alternatives must be put forward". The

⁴ Paragraph: 072 Reference ID: 41-072-20190509

Guidance notes that “to keep the big issues clear, the alternative considered at this early stage need not be elaborated in too much detail. Only the main differences between the alternatives need to be considered and documented”. It also notes that “the assessment of alternatives may be made in broad terms against the SEA objectives, provided there is sufficient need to identify the significant i.e. environmental effects of each alternative.”

- 5.42. With respect to the SA appraisal of Aim 2, in line with guidance, the strategy of Aim has been tested against a reasonable alternative i.e a policy off alternative. In line with guidance, it is submitted this is a reasonable and acceptable approach.
- 5.43. In response to the submissions that the SA should of tested the 4 plan making options considered by the NPWG., Paragraph 5.B.7 of the Practical Guide to the SEA Directive, makes clear that, it is not the purpose of the SEA to decide the alternatives to be chosen for the plan or programme as that is the role of the decision-maker to have to make choices on the plan or programme to be adopted. Rather, “SEA simply provides information on the relative environmental performances, and can make the decision-making process more transparent”. The SA has been prepared in line with best practice guidance.
- 5.44. With respect to concerns raised in relation to the SA of Aim 2, Huffwood comprises over thirty small business units within the centre of the village. A variety of uses occupy the site including office, light industrial, general industrial and warehouse and distribution. The buildings range in age from the 1960’s onwards and are generally single storey and small in scale. In light of the age of the units, some units are out dated and poorly suited for modern business needs.
- 5.45. Aim 2 supports the relocation of business uses from Huffwood to Land south of Start Road. It is envisaged this would enable the comprehensive redevelopment of Huffwood for residential uses. It is envisaged Land south of Start Road would provide suitable high quality space for businesses and could provide opportunities for business to grow, expand and/or change to meet modern business needs.
- 5.46. It is considered reasonable to assume modern and efficient business units would be provided on Land south of Star Road. The provision of such spaces would have a demonstrable significant positive impact on the economic objectives of Option A above Option B for e.g. by providing improved facilities with modern loading bay arrangements.
- 5.47. It is also reasonable to assume, the relocation of business uses at Huffwood to Land south of Star Road would decrease the number of HGV vehicles accessing the centre of Partridge Green. It is considered this would also have demonstrable positive effect on the social objectives for e.g improved residential amenity surrounding Huffwood. The provision of residential units at Huffwood would also provide economic, social and environmental benefits.
- 5.48. A Memorandum of Understanding (MoU) was agreed and signed between landowners in October 2018. This set out the basis of understanding between the parties in relation to their respective land holdings. It confirms the landowners support for the inclusion/allocation of both parcels of land within the WGNP to enable the development of Huffwood Trading Estate for residential development and Land South of Star Road for commercial development. In addition, it sets out a commitment to advance negotiations in good faith and expeditiously. There is no evidence to indicate the aspiration of Aim 2: North and South of Star Road cannot be delivered.

- 5.49. For these reasons it submitted Option A delivers more positive benefits overall which outweigh the negative impacts. It is considered the inclusion of Aim 2 offers a sustainable option and the effect of the option on the social, economic and environmental objectives have been considered in line with Government guidance.

6. NEXT STEPS

- 6.1. This SA will be consulted on alongside the Submission HNP for a minimum period of 6 weeks.
- 6.2. The information within this Report has been taken into account in preparing the Submission SA.
- 6.3. Once adopted, the effects of implementing the HNP are to be monitored to assess any impacts, including unforeseen adverse impacts. This will need to allow for remediate action to take place. On this basis, each sustainability objective is accompanied by a range of practical indicators. These are to be used to assess the achievement of the policies against the 12 Sustainability Objectives.P

APPENDIX 1

(West Grinstead Neighbourhood Plan Policy Options)

Policy/Aim	Objective 1: Conserve/Enhance Rural Character	Objective 2: Protect/Enhance Biodiversity	Objective 3: Protect/Enhance Heritage Assets	Objective 4: Flooding	Objective 5: Reduce Impact on Climate Change	Objective 6: Improve Highway Safety	Objective 7: Housing Need & Affordable Homes	Objective 8: Safe Environment	Objective 9: Improve Non-Car Modes of Transport	Objective 10: Maintain/Enhance Community Infrastructure	Objective 11: Maintain/Enhance Economic Base	Objective 12: Stable Employment/Address Disparities	Objective 13: Retail
Policy 1: Retention of Local Gaps	✓✓	✓	✓	0	?✓	0	?✘	0	?✓	0	?✘	?✘	0
Policy 2: Open Space	?✘	0	0	0	0	0	0	0	✓	✓✓	0	0	0
Policy 3: Local Green Space	✓✓	✓✓	?✓	0	0	0	?✘	0	0	✓	0	0	0
Policy 4: Green Infrastructure: Existing Trees, Hedges, Habitats and Wildlife	✓✓	✓	0	✓	?✓	0	?✘	0	✓✓	✓✓	0	0	0
Policy 5: Community Facilities	?✘	0	✓	0	0	0	0	0	✓	✓✓	0	0	0
Policy 6: Broadband	0	0	0	0	0	0	0	0	?✓	✓✓	✓	✓	✓
Aim 1: Partridge Green Fire Station	0	0	0	0	0	0	✓	0	?✓	?✓	?✓	?✓	0
Aim 2: North and South of Star Road	✘	✘	0	?✘	✓	✓	✓✓	0	✓	0	✓✓	✓✓	0
Policy 7: Retail Premises	?✘	?✘	0	0	0	?✘	0	0	0	0	✓✓	✓✓	✓✓
Policy 8: Employment	?✘	?✘	0	0	0	?✘	0	0	0	0	✓✓	✓✓	✓✓
Policy 9: Redundant Farm Buildings	?✘	0	0	0	0	?✘	0	0	0	0	✓✓	✓✓	✓✓
Aim 3: Roads, Traffic and Congestion	0	0	0	0	0	✓	0	✓	0	0	0	0	0
Aim 4: Congestion and Parking	0	0	0	0	0	✓	0	0	✓	0	0	0	0
Policy 10: Car Parking	0	0	0	0	0	✓	0	0	0	✓	✓	0	0
Aim 5: Highway and Pedestrian Safety	0	0	0	0	0	✓	0	0	✓	0	0	0	0
Aim 6: Bus Services	0	0	0	0	0	✓	0	0	✓	0	0	0	0
Aim 7: Footpaths, Bridleways and Cycleways	0	0	0	0	0	✓	0	0	✓	0	0	0	0

✓✓	significant positive impact on the sustainability objectives.
✓	positive impact on the sustainability objective.
?✓	possible positive or slight positive impact on the sustainability objectives.
0	No impact or neutral impact of sustainability objectives.
?✘	possible negative or slight negative impact on the sustainability objectives.
✘	negative impact on the sustainability objective.
✘✘	significant negative impact on the sustainability objectives.

Aim 1: Partridge Green Fire Station	Objective 1: Conserve/Enhance Rural Character	Objective 2: Protect/Enhance Biodiversity	Objective 3: Protect/Enhance Heritage Assets	Objective 4: Flooding	Objective 5: Reduce Impact on Climate Change	Objective 6: Improve Highway Safety	Objective 7: Housing Need & Affordable Homes	Objective 8: Safe Environment	Objective 9: Improve Non-Car Modes of Transport	Objective 10: Maintain/Enhance Community Infrastructure	Objective 11: Maintain/Enhance Economic Base	Objective 12: Stable Employment/Address Disparities	Objective 13: Retail
A	0	0	0	0	0	0	0	0	0	✓✓	✓	✓	0
B	0	0	0	0	0	0	✓	0	✓	✓	✓	✓	0
C	0	0	0	0	0	0	0	0	0	0	0	0	0

Option A: To have an Aim to support the retention of the Fire Station.

Option B: To have an Aim which supports the retention of the Fire Station and the redevelopment of the site for mixed use (should the site be redeveloped).

Option C: To not have an Aim and rely on the National Planning Policy Framework and policies of the Horsham District Planning Framework.

Appraisal: Option A facilitates support for the retention of the fire station in the Parish. Option B seeks to support the retention of the facility however should the site be redeveloped its supports the provision of a mix use facility. This Option will ensure the site continues to be used for the most appropriate/sustainable use. Option C would not provide such support and so fails to positively contribute to sustainability objectives.

Preferred Aim Option: B

✓✓	significant positive impact on the sustainability objectives.
✓	positive impact on the sustainability objective.
✓	possible positive or slight positive impact on the sustainability objectives.
0	No impact or neutral impact of sustainability objectives.
✗✗	possible negative or slight negative impact on the sustainability objectives.
✗	negative impact on the sustainability objective.
✗✗	significant negative impact on the sustainability objectives.

Policy 9: Redundant Farm Buildings	Objective 1: Conserve/ Enhance Rural Character	Objective 2: Protect/Enhance Biodiversity	Objective 3: Protect/Enhance Heritage Assets	Objective 4: Flooding	Objective 5: Reduce Impact on Climate Change	Objective 6: Improve Highway Safety	Objective 7: Housing Need & Affordable Homes	Objective 8: Safe Environment	Objective 9: Improve Non-Car Modes of Transport	Objective 10: Maintain/ Enhance Community Infrastructure	Objective 11: Maintain/ Enhance Economic Base	Objective 12: Stable Employment/ Address Disparities	Objective 13: Retail
A	?*	0	0	0	0	?*	0	0	0	0	✓	✓	✓
B	?*	0	0	0	0	?*	0	0	0	0	✓	✓	✓
C	0	0	0	0	0	0	0	0	0	0	0	0	0
Option A: To have a policy that supports the conversion of redundant farm buildings to business or tourist uses.													
Option B: To have a policy that supports the conversion of redundant farm buildings to business or tourist uses subject to compliance with a number of criteria.													
Option C: To not have a policy, and rely on the National Planning Policy Framework and policies of the Horsham District Planning Framework.													
Appraisal: Option A and B both positively support economic activities within the Parish. However, Option B tempers this support by the importance of criteria to ensure economic activity does not adversely effect other Strategic Objectives. Option C would fail to provide targeted support and therefore lead to uncertainty in positively delivering against economic objectives.													
Preferred Policy Option: B													
✓✓	significant positive impact on the sustainability objectives.												
✓	positive impact on the sustainability objective.												
?✓	possible positive or slight positive impact on the sustainability objectives.												
0	No impact or neutral impact of sustainability objectives.												
?*	possible negative or slight negative impact on the sustainability objectives.												
*	negative impact on the sustainability objective.												
**	significant negative impact on the sustainability objectives.												

