

West Grinstead Neighbourhood Plan
Sustainability Appraisal (incorporating Strategic
Environmental Assessment)
Non-Technical Summary



March 2020

Contents

Page

1.	Introduction	1
2.	West Grinstead Neighbourhood Plan	1
3.	Sustainability Appraisal	1
4.	Scoping Report	2
5.	Pre-Submission Sustainability Appraisal of the West Grinstead Neighbourhood Plan	4
6.	Representations Made in Response to the Regulation 14 Pre-Submission Sustainability Appraisal	5
7.	Submission Sustainability Appraisal of the West Grinstead Neighbourhood Plan	6

1. INTRODUCTION

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

2. WEST GRINSTEAD NEIGHBOURHOOD PLAN

- 2.1. Horsham District Council (HDC), as the Local Planning Authority, approved the designation of the Parish of West Grinstead as a Neighbourhood Plan Area on 31 October 2013.
- 2.2. The WGNP has been prepared by West Grinstead Parish Council (WGPC) in accordance with the Neighbourhood Planning (General) Regulations 2012.
- 2.3. This WGNP reflects the culmination of work by the NPWG since the Parish was designated for neighbourhood plan making in October 2013. The preparation of the WGNP has involved extensive background work and stakeholder engagement.
- 2.4. It sets out the Vision and Strategic Objectives of the WGNP 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. Sustainability Appraisals are an iterative process, informing the development of the Plan.
- 3.3. There is no legal requirement for a neighbourhood plan to have a sustainability appraisal 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 sustainability appraisal 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.

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

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

- 3.5. The NPPG 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 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, WGPC have resolved to undertake a Sustainability Appraisal that incorporates a Strategic Environmental Assessment. Where reference is made in this report to a Sustainability Appraisal, it includes the incorporation of a Strategic Environmental Assessment).

4. SCOPING REPORT

- 4.1. Government guidance advises the 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 sets out the:
- ▶ Background to the meaning of sustainable development;
 - ▶ Vision and objectives of the WGNP;
 - ▶ 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 Sustainability Appraisal will consider the effects of the WGNP against reasonable alternatives, using a series of objectives and indicators.
- 4.5. The Sustainability Appraisal 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 WGNP contribute to the overarching aim of sustainable development.

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

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

- 4.6. It is proposed that the performance of the policy options are measured against the objectives as follows:

✓✓	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 WGNP are as follows:

Theme	Objective
Environmental	Objective 1 - Countryside And Landscape Character
Environmental	Objective 2 - Ecology
Environmental	Objective 3 - Heritage Assets
Environmental	Objective 4 - Water & Flooding
Environmental	Objective 5 - Climate Change
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
Economic	Objective 13 - Retail

- 4.9. The Scoping Report and baseline data was subject to public consultation with statutory bodies (English Heritage, Natural England, the Environment Agency) in December 2014 for a five week period.
- 4.10. In response to the consultation, 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.
- 4.11. In response to the Scoping Report, Natural England :
- Supported Objective 1 to preserve the rural character of the Parish and Objective 2 to protect and enhance biodiversity.
 - 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 - Ecological 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.
 - 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.
- 4.12. No feedback was received from Historic England.

5. PRE-SUBMISSION SUSTAINABILITY APPRAISAL OF THE WEST GRINSTEAD 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 WGNP (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; 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 WGNP for compatibility with the 13 Sustainability Objectives. This confirmed the WGNP Strategic Objectives and the Sustainability Objectives are compatible or have a neutral impact. This exercised indicated that the WGNP 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 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 WGNP and address some of the challenges facing the Parish, a range of policy areas and aims were selected for inclusion within the WGNP. These were 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
- 5.7. All policy options and aims have been appraised, to assess the impact on the 13 Sustainability Objectives set out in the Sustainability Framework.
- 5.8. The overall appraisal ensures that the policies and aims selected and taken forward in the WGNP are the most sustainable, given reasonable alternatives.
- 5.9. The Pre-submission SA was consulted on alongside the Pre-submission WGNP for a 8 week period from 29 August - 23 September 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, a total of 26 responses were received.
- 6.2. The comments are broken down as follows:

- **Developers/Landowners/Agents: 5**
- **Statutory Bodies: 9**
- **Residents: 12**

- 6.3. With respect to the SA, 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 WGPNP); and
- Sustainability Appraisal of Aim 2: Land north and south of Star Road.

6.4. A detailed response to matters raised is set out in Section 5 of the accompanying SA.

7. SUBMISSION SUSTAINABILITY APPRAISAL OF THE WEST GRINSTEAD NEIGHBOURHOOD PLAN

- 7.1. As a result of the overall feedback received in response to the Regulation 14 Pre-submission consultation, no substantive changes have been made to the Policies or Aims. Consequential minor amendments were also made to the SA.
- 7.2. The Submission CNP and accompanying documents including the SA were finalised in February/March 2020.