

**Lower Beeding Neighbourhood Plan
Submission Sustainability Appraisal (incorporating
Strategic Environmental Assessment)
Non-Technical Summary**



July 2020

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1. INTRODUCTION

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

2. LOWER BEEDING NEIGHBOURHOOD PLAN

- 2.1. Horsham District Council (HDC), as the Local Planning Authority, approved the designation of the Parish of Lower Beedings as a Neighbourhood Plan Area in December 2015.
- 2.2. The LBNP has been prepared by Lower Beeding Parish Council (LBPC) in accordance with the Neighbourhood Planning (General) Regulations 2012.
- 2.3. This LBNP reflects the culmination of work by the Neighbourhood Plan Working Group (NPWG) since LBPC was designated for neighbourhood plan making in December 2015. The preparation of the LBNP has involved extensive background work and stakeholder engagement.
- 2.4. It sets out the Vision and Strategic Objectives of the LBNP along with planning policies and aims to guide development in the Parish up to 2031.

3. SUSTAINABILITY APPRAISAL

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

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

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

- 3.5. National Planning Policy Guidance advises a neighbourhood plan may require an environmental assessment if it is likely to have a significant effect on the environment. Where this is the case the 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, LBPC have resolved to undertake a SA that incorporates a Strategic Environmental Assessment. Where reference is made in this report to a SA, it includes the incorporation of a Strategic Environmental Assessment).

4. SCOPING REPORT

- 4.1. Government guidance advises 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 set out the:
- ▶ Background to the meaning of sustainable development;
 - ▶ Vision and objectives of the LBNP;
 - ▶ Sustainability Appraisal methodology
- 4.3. In addition, it set out
- ▶ Relevant policies, Plans, programmes and environmental protection objectives;
 - ▶ Evidence baseline information;
 - ▶ Issues, problems and trends; and
 - ▶ Proposed sustainability objectives and indicators (known as the Sustainability Framework)
- 4.4. The Scoping Report confirmed the SA will consider the effects of the LBNP against reasonable alternatives, using a series of objectives and indicators.
- 4.5. The SA will identify objectives that cover the 3 limbs of sustainability, i.e. Environmental, Social and Economic. These will be capable of being measured against a set of indicators. Collectively, the sustainability objectives and the indicators are known as the Sustainability Framework. These will be used to ensure that the policy options selected in the LBNP contribute to the overarching aim of sustainable development.
- 4.6. The performance of the policy options are measured against the objectives as follows:

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

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

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

4.7. The Sustainability Objectives have been informed by the appraisal of the identification of other relevant policies, Plans, programmes and environmental protection objectives, the collection of baseline information, and the identification of sustainability issues and problems. The latter have, in part, been established from the results of the initial evidence gathering and stakeholder engagement and with regard to the Sustainability Framework of the Horsham District Planning Framework.

4.8. Based on this, the sustainability objectives and indicators (the Sustainability Framework) of the LBNP are as follows:

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

- 4.9. The Scoping Report and baseline data was subject to public consultation with statutory bodies (English Heritage, Natural England, the Environment Agency) in July 2016 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. In addition, the Environment Agency recommended indicators should relate to the environmental constraints in your local area. This may include flood risk, water quality, and biodiversity.
- 4.11. The Environment Agency recommended the SEA takes account of relevant policies, plans and strategies including your local Strategic Flood Risk Assessment, flood risk strategies and the South East River Basin Management Plan.
- 4.12. In response to the Scoping Report, Historic England, confirmed they are pleased a Historic Environment Report for the Parish has been obtained.
- 4.13. It was recommend mapping and a short text description was included to confirm:
- Whether the records show any concentrations of archaeological remains that may suggest an area of particular sensitivity requiring a positive approach in planning; and
 - Whether any areas of search for site allocations have been recorded as sites of archaeological interest/remains or can be predicated to have archaeological potential.
- 4.14. Historic England advised it would be helpful if the Report identified evidence of past issues arising from impacts on heritage assets, such as the effects of development within or on the edge of the Conservation Area, as this would help to justify that reliance on district level policies may not be sufficient to protect the Parish's heritage asset. Furthermore advise recommended if this cannot be demonstrated, this evidence gap would need to be identified in the baseline statement.
- 4.15. Comments advised a Conservation Area appraisal could be prepared to accompany the plan that would identify any key issues for the areas's management.
- 4.16. In respect to Stage A3, Historic England advised that identifying a character statement may enable this consideration as an evidence gap to positively influence the preparation of a suitable and robust evidence base for the plan as part of the SA process.
- 4.17. In respect to Stage 4, Historic England, and Objective 3, heritage impact, advised the indicator could be expanded to include heritage assets "enhanced" as part of development. An additional indicator to "identify heritage asses, or their setting, harmed by development to help identify where lack of success in meeting the objectives may require some amendment.
- 4.18. No response to the Scoping Report was received from Natural England.

5. PRE-SUBMISSION SUSTAINABILITY APPRAISAL OF THE LOWER BEEDING 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 LBNP (with updates) and a summary of the challenges for the future of the Parish;
- The Sustainability Framework - Objectives and indicators;
- An appraisal of policy options;
- An appraisal of housing options; and
- Next steps.

5.2. With respect to the Sustainability Framework this has emerged through careful appraisal of relevant International, National, Regional, District and Local Plans and Programmes, the collection of baseline data, local knowledge of sustainability challenges faced in the Parish and a SWOT analysis.

5.3. The Pre-submission SA assessed the Strategic Objectives of the LBNP for compatibility with the 11 Sustainability Objectives. This confirmed the LBNP Strategic Objectives and the Sustainability Objectives are compatible or have a neutral impact. This exercised indicated that the LBNP 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 LBNP and address some of the challenges facing the Parish, a range of policy areas and aims were selected for inclusion within the LBNP. These are appraised as part of the Pre-submission SA to determine whether they have a positive or negative impact, using the Sustainability Framework.

5.6. A range of policy areas and aims have been considered and a range of options for each policy have been identified. All policy options and aims have been appraised, to assess the impact on the 11 Sustainability Objectives set out in the Sustainability Framework. The overall appraisal ensures that the policies and aims selected and taken forward in the LBNP are the most sustainable, given reasonable alternatives.

5.7. In addition to the policy appraisal, an appraisal has been undertaken of the candidate housing sites. All potential housing sites were each tested against the Sustainability Framework. The Assessment

shows the majority of potential housing sites would have some negative impact on environmental Objectives. The extent of this varies dependent on the location of the site.

- 5.8. In order to seek to facilitate the delivery of housing need in the parish, it is considered inevitable there will be some harm, particularly against Environmental Objectives. Mitigation measures to minimise this have been duly considered and are set out in individual Housing Sites Assessments.
- 5.9. The sites selected for allocation for housing development, to meet the needs of the Plan area have been chosen with regard to minimising their environmental impact, including through the use of mitigation measures.
- 5.10. The Pre-submission SA was consulted on alongside the Pre-submission LBNP from 25 November 2019 - 17 January 2020.

6. REGULATION 14 PRE-SUBMISSION CONSULTATION

- 6.1. In response to the Regulation 14 Pre-submission consultation 1 comment were received from Savills in respect of Appendix 1: Housing Site Assessment.
- 6.2. Representations recommend the assessment of LBP19 should be updated to acknowledge the smaller site has been allocated within the LBNP.
- 6.3. In light of the representation received, no amendments have been made to the assessment of the SA objectives of LBP19. The supporting text of the assessment has been updated to to acknowledge the smaller site has been allocated within the LBNP.

7. SUBMISSION SUSTAINABILITY APPRAISAL OF THE LOWER BEEDING NEIGHBOURHOOD PLAN

- 7.1. As a result of the overall feedback received in response to the Regulation 14 Pre-submission consultation, a number of minor amendments were made to the INP to strengthen and clarify policies and to ensure alignment with national planning policy guidance and the Horsham District Planning Framework. Consequential minor amendments were also made to the SA.
- 7.2. The Submission INP and accompanying documents including the SA were finalised in July 2020.