

Henfield Neighbourhood Development Plan

SUSTAINABILITY APPRAISAL

INCORPORATING STRATEGIC ENVIRONMENTAL ASSESSMENT

SCOPING REPORT

March 2018

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1.0 INTRODUCTION

- 1.1 Under the regulations of The Planning and Compulsory Purchase Act (2004), a Sustainability Appraisal (SA) for the Henfield Neighbourhood Plan must be prepared. In addition, an EU Directive also requires that a Strategic Environmental Assessment (SEA) is undertaken to ensure that the environmental effects of the Local Plan are taken into account. This fulfils both of these requirements and identifies the social, environmental and economic impacts of the Henfield Neighbourhood Plan.
- 1.2 This document forms the Scoping Report for the SA/SEA and seeks views from statutory bodies on the proposed approach and objectives that will be considered through this process.
- 1.3 The responses received to this Scoping Opinion will be taken into consideration when developing the final SA/SEA approach and subsequent policies within the Henfield Neighbourhood Plan.

About this document

What is a sustainability appraisal, and how does it relate to strategic environmental assessment?

1.4 National Planning Policy Guidance Paragraph: 001 Reference ID: 11-001-20140306 confirms that:

'A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the Local Plan.

Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so "with the objective of contributing to the achievement of sustainable development".

Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment. Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues.

Strategic environmental assessment alone can be required in some limited situations where sustainability appraisal is not needed. This is usually only where either neighbourhood plans or supplementary planning documents could have significant environmental effects.'

What is the Strategic Environmental Assessment Directive?

1.5 National Planning Policy Guidance Paragraph: 002 Reference ID: 11-002-20140306 confirms that:

'The Strategic Environmental Assessment Directive is a European Union requirement that seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes.

The aim of the Directive is "to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuing that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."

The Strategic Environmental Assessment Directive is implemented through the Environmental Assessment of Plans and Programmes Regulations 2004, which apply to a plan or programme related solely to England (or part of England), or to England (or part of England) and any other part of the United Kingdom. Where the Directive applies there are some specific requirements that must be complied with and which, in the case of Local Plans, should be addressed as an integral part of the sustainability appraisal process.'

- 1.6 The directive is included at Appendix 1 for reference but where an environmental assessment is required the directive confirms at Annex 1 that the following should be included within such a report:
 - (a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;
 - (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;

- (c) the environmental characteristics of areas likely to be significantly affected;
- (d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
- (e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;
- (f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
- (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;
- (h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;
- *(i)* a description of the measures envisaged concerning monitoring in accordance with Article 10;
- (j) a non-technical summary of the information provided under the above headings.

What is the difference between sustainability appraisal, strategic environmental assessment and Environmental Impact Assessment?

1.7 National Planning Policy Guidance Paragraph: 003 Reference ID: 11-003-20140306 confirms that:

'Sustainability appraisal and strategic environmental assessment are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. A sustainability appraisal of the proposals in each Local Plan is required by section 19 of the Planning and Compulsory Purchase Act 2004 and incorporates the required strategic environmental assessment. Strategic environmental assessment alone can be required in some exceptional situations. This is usually only where either neighbourhood plans or supplementary planning documents could have significant environmental effects.

In contrast Environmental Impact Assessment is applied to individual projects which are likely to have significant environmental effects (also see the Town and Country Planning (Environmental Impact Assessment) Regulations 2011).'

2.0 LEGAL & POLICY CONTEXT

2.1 This section provides an overview of the broad legal and planning policy context for the Henfield Neighbourhood Plan. It should be noted that this section aims to highlight how the plan may be affected by, and affects, other policies, plans, programmes and initiatives already in existence.

UK legal context of neighbourhood planning

- 2.2 Whilst there is a wide legal context that should be and has been considered in the preparation of this document, there is arguably one piece of legislation that provides the overarching legal basis for neighbourhood plans. Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 provides a set of basic conditions that a neighbourhood plan must meet in order for it to pass examination.
- 2.3 The basic conditions are:
 - (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
 - (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
 - (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
 - (d) the making of the order contributes to the achievement of sustainable development,
 - (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
 - (f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and
 - (g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.
- 2.4 These conditions must be met and may act to limit the neighbourhood plan in what it can propose. Therefore it follows that these could restrict what could be considered a reasonable alternative later in the SA/SEA process.

National Planning Policy Framework

- 2.5 Development in the UK is a plan led system. Indeed, the National Planning Policy Framework (NPPF) confirms at paragraphs 11 to 13 that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.¹ The NPPF does not change the statutory status of the development plan as the starting point for decision making and constitutes guidance for plan makers and decision takers.
- 2.6 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. This is set out at paragraph 14 which also clarifies that;

'For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted...'
- 2.7 Paragraph 16 continues to clarify what this presumption means in the context of neighbourhood planning. It states:

'The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:

- develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;
- plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and
- identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.'
- 2.8 Further information on the relationship between Local Plans and the Neighbourhood Plans is set out at paragraphs 184 and 185. This clarifies that the ambition of the

¹ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

^{10 |} LEGAL & POLICY CONTEXT

neighbourhood plan should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. This requirement is therefore likely to have a limiting factor on what may constitute a reasonable alternative for consideration and inclusion within the neighbourhood plan.

Local Planning Policy

- 2.9 The Parish of Henfield is located towards the SE of Horsham District and part of it falls within the South Downs National Park. The parish therefore falls within two Local Planning Authorities, namely Horsham District Council (HDC) and the South Downs National Park Authority (SDNPA). Only a small part of the parish falls within the SDNP and therefore HDC is the primary planning authority.
- 2.10 On 27 November 2015 Horsham District Council adopted the Horsham District Planning Framework (HDPF). With the exception of land within the South Downs National Park, the HDPF replaces the policies contained in The Core Strategy and General Development Control Policies which were both adopted in 2007.
- 2.11 The Core Strategy and General Development Control Policies remain the adopted Development Plan Documents (DPDs) for the area within the South Downs National Park until the adoption of a Local Plan for the national park. The South Downs Local Plan (Pre-Submission Version) was consulted on in September 2017 and it anticipated to be submitted for examination in Spring 2018.
- 2.12 As the vast majority of the parish is located outside of the National Park, this policy framework is arguably more relevant to the wider sustainability objectives of the parish, The key elements of the Framework are:
 - Development should take place at Horsham first, followed by Southwater and then Billingshurst along with some development in other villages in accordance with Neighbourhood Plans, which are currently being produced by communities across the district.
 - The need to retain good employment sites to support the local economy and growth in the Gatwick Diamond area as a whole is justified and sound.
 - The housing requirement for the Plan period should be at least 16,000 dwellings at a rate of 800 dwellings per year.
 - Three strategic development areas should be brought forward for 'at least' 2,500 dwellings at North Horsham, around 600 dwellings west of Southwater and around 150 dwellings south of Billingshurst.

2.13 In order to ensure that the District can continue to deliver 800 homes per year across the plan period, the plan will be subject to an early review, to commence within three years. Land west of Southwater, land east of Billingshurst and land at Crawley were all identified as areas to be revisited through this process. The review will also need to consider whether the plan should be updated to take account of any national changes to planning policy.

3.0 SUSTAINABILITY ISSUES FACING HENFIELD

- 3.1 In order to prepare this report, it is essential that the environmental context is clearly identified so that judgements can be made based on a sound understanding of the current conditions.
- 3.2 As part of the Sustainability Appraisal it is necessary to identify the key sustainability issues facing the parish. These have been informed through the following sources:
 - A review of the plans and policies produced by Horsham District Council where reference is made to Henfield.
 - An analysis of baseline data on Henfield.
 - The SA produced for the Horsham District Planning Framework.
- 3.3 The Steering group have prepared detailed evidence that will accompany the Neighbourhood Plan, this document draws out some of the key issues identified below:

Geographical Overview

- 3.4 The village of Henfield is classed as a Large Village, the second tier of settlement behind Horsham, in the Horsham District Planning Framework (Policy 3 - Strategic Policy: Development Hierarchy). It is therefore described as having 'a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and / or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements/ each other to meet some of their requirements.'
- 3.5 Although the settlement hierarchy gives an indication of the services and facilities present within Henfield, the relationship to other settlements within and outside Horsham District is more clearly illustrated in Figure 1 The plan area in its wider context and shows that settlements including Partridge Green, Steyning, Upper Beeding, Hurstpierpoint and Burgess Hill to name a few are all geographically close to the plan area. Despite this the 2011 census travel to work data confirms that the majority of residents in Henfield parish work within the District (735 journeys to work were in HDC, 241 to Brighton and Hove, 175 to Mid Sussex, 138 to Crawley and 103 to London totalling 657 outside HDC).
- 3.6 It is therefore key that the neighbourhood plan for the area takes into account its wider context as well as the context provided by the planning authorities in which it sits.

Mole Valley District iers Hill Waverley District (B) Crawley District (B) Selsfield Common HX Worth Rudgwick arnha West Hoathly Pease idge С **Bucks Green** Roff Colgate Heath ST LEONARD'S Slinfold, Highbrook EALD OREST Balcombe Ardingly Itchingfield und reet Staplefield ter District Five Oaks Barns Nut Billingshurst Lindfie Cuckfield Office HAYWAR HEATH Mapleh Dra 5km dol Insty Horsham District Cowfold Gay Street Broomer Nort Wivelsfield Corne West Heath Wivelst Grinstead B GESS Dial Po Nut Gre Chil 1 ehill 12 West Chiltingto orough Thakeham Hurstpierpoint field Ditchling Ashington Lewes District loodm Storrington Westmeston Wistor /ashing llington 1km vning North End Findon OREHAM BY-SEA Arun District **N**ak slade The City of Brighton and Hove (B) North LanciAdur District SOUTI WICK Brighton City npting Airport Worthing District (B) oreham Beach Sta PORTSLA Angmering 10km BRIGHTON AND HO Ma WORTHING 🔺 🖻 🕀 ។ Rottingde Goring-by-Sea **District Boundary** Henfield Parish / Plan Area South Downs National Park Distance from parish boundary

Figure 1 - The plan area in its wider context

Population & Housing

- 3.7 The 2011 census confirmed that the parish has 5349 residents, of these:
 - 16.7% are aged 15 and under (compared to 18.7% across the District and 19% across England)

- 54.3% are aged 16 to 64 (compared to 61.8% across the District and 65% across England)
- 29.0% are aged 65 and over (compared to 19.5% across the District and 16% across England)
- 3.8 Whilst this data only provides a very broad overview of the parish's population, it immediately highlights a number of potential issues facing the parish, from how to adequately provide for this ageing population whilst also promoting development that would boost the local economy and in turn attract more people of working age to live within the parish. These matters are considered in more detail below.
- 3.9 The UK population is rising as is the population of Horsham and the plan area. New homes will be required to meet this rise in population growth. HDPF Policy 15 confirms that 1500 homes will be provided throughout the district by neighbourhood plans in accordance with the settlement hierarchy (set out in HDPF Policy 3). These sites are expected to come forward as allocations in the Neighbourhood Plan.
- 3.10 In order to establish the Henfield Neighbourhood Plan's appropriate share of this 1500 homes a Housing Needs Assessment has been carried out by AECOM. This provides a minimum unconstrained figure of between 272 and 285 new homes which the HNDP will need to accommodate, subject to other sustainability considerations including environmental or infrastructure constraints. Where these new homes are located and the impacts such development would have on the sustainability of the plan area are key issues that need to be discussed in this document.

Employment & Economy

- 3.11 The village of Henfield has a thriving High Street with a good variety of, mainly independent, shops. It also benefits from a range of light industrial units on a number of sites within the village and the countryside around the village. For the size of settlement / plan area there is a diverse mix of employment types and spaces. There is however local concern that this may change over time partly as a response to national changes (eg the closure of banks as more people access services online). It is broadly considered that there is a lack of employment land and space for small businesses to expand within th edistrict
- 3.12 However, in line with the ageing population profile there is a larger than average percentage of retired people within the plan area (19.66% compared to the district average of 15.48%). There is also a larger than average part time and self-employed portion of the community.
- 3.13 The economic picture is therefore generally good, but there are a number of potential threats to the local economy, which the plan should seek to avoid moving forward. The lower than average working age population has the potential to be a long term issue

which the plan should seek to influence positively. An ageing population can have a number of localised impacts ranging from employers leaving the area so they are closer to an active workforce, an increase in migration into the area to fill vacancies, a change in the type of services or facilities required and have implications for the types and sizes of housing available.

Biodiversity

- 3.14 The plan area does not have any of the following designations within or within 10km of the plan area boundary:
 - RAMSAR Site a Wetland of International Importance under the Convention on Wetlands of International Importance Especially as Waterfowl Habitat (the Ramsar Convention) 1973.
 - Local Nature Reserve designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 for places with wildlife or geological features that are of special interest locally.
 - Special Area of Conservation (SAC) the land designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora.
 - Special Protection Areas (SPAs) sites classified in accordance with Article 4 of the EC Birds Directive for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.
- 3.15 There are no Sites of Special Scientific Interest within the plan area but there are some located to the south within the National Park. These areas are notified as an SSSI under the Wildlife and Countryside Act (1981), as amended and represent the finest sites for ildlife and natural features in England, supporting many characteristic, rare and endangered species, habitats and natural features. Care must therefore be taken to ensure that the neighbourhood plan would not result in harm to these sites.
- 3.16 Priority Habitats and Ancient Woodland are also present within the plan area and these also have the potential to suffer harm as a result of development within the parish.
- 3.17 A full assessment of the implications of the plan on biodiversity will be undertaken through the separate Habitat Regulations Assessment process, this will include an assessment, as necessary, of designated areas that may be affected by the plan (including, for example, the Ashdown Forest SAC).

Human Health, Education & Fitness

3.18 The 2011 Census confirms that Henfield Parish has slightly lower proportions of its usual residents who report that they are in very good or good health as compared with Horsham District, and slightly higher proportions of those in fair, bad or very bad health.

- 3.19 The parish does benefit from a medical centre, dentists, HART and other health services in the village and despite this the population appears to be in relatively poor health. This could be due to the existing facilities needing attention, a reflection of the ageing population, a combination of these factors or a symptom of something else.
- 3.20 Concern has been expressed regarding the capacity of existing services, including local schools, and these issues will need to be addressed by the neighbourhood plan.

Flooding & associated infrastructure

- 3.21 The western boundary of the parish is formed by the River Adur. This river and its tributaries have a tendency to cause fluvial flooding and as a result there is a large area of land designated as Flood Zone 2 or 3 along the western and northern boundaries of the parish, with a stretch heading across the parish east/west just north of the village of Henfield.
- 3.22 In addition, surface water flooding occurs within the parish, partially as a result of surface water culverts / drains and wastewater (sewerage) systems having inadequate capacity to deal with current flows at peak times. It is thought that this has at least partly been emphasised by poor design on new developments and inadequate investment in sewerage infrastructure.

Historic Character and Archaeology

- 3.23 The parish has a large number of listed buildings throughout the parish but particularly located at the heart of Henfield along the High Street which is also a designated Conservation Area. There are no Scheduled Monuments or Historic Parks & Gardens within the plan area.
- 3.24 The local community feel very strongly about the historic identity of Henfield and this is evident through the Parish Design Statement. Maintaining the historic integrity of the parish whilst planning for new development will be a complex matter to grapple.

Landscape

- 3.25 The landscape around the village of Henfield is highly sensitive as established in the latest Landscape Capacity Study prepared by HDC. New development will therefore need to be carefully introduced into the environment to ensure the overall character of the parish is retained.
- 3.26 Whilst the area outside of the National Park is not subject to any landscape designation the setting of the National Park will need to be a key consideration in any decisions made with regard to new development as the one of the purposes of the national park is to conserve and enhance the natural beauty of it.

Community Wellbeing

3.27 Whilst all of the issues discussed above are important to community wellbeing, one observed issue that has been highlighted through consultation to date, is the perceived overdevelopment of the parish and the impact this is having on the community. Whilst it is noted that the neighbourhood plan will set out how development should come forward in the coming years, it is important to ensure that it does so in such a way that maintains community spirit and cohesiveness.

4.0 SA/SEA OBJECTIVES

- 4.1 In order to undertake the Sustainability Appraisal process, it is necessary to identify sustainability objectives and indicators (by which to measure these objectives) to enable an assessment to be made of the emerging options of the Neighbourhood Plan. The sustainability objectives and indicators combined are known as the Sustainability Framework.
- 4.2 The development of these objectives has taken into consideration the sustainability objectives of the Horsham District Planning Framework Sustainability Appraisal (May 2014) and issues identified within it.
- 4.3 The primary aim of the sustainability framework is to assess the reasonable alternatives to the Neighbourhood Plan in order to determine which option is the most sustainable (and therefore included within the plan). The sustainability indicators have also been developed to provide a mechanism to measure how the Neighbourhood Plan, once adopted, is contributing towards sustainable development. To establish the indicators a number of issues have been considered, particularly:
- 4.4 As the neighbourhood plan must be in general conformity with the HDPF the sustainability objectives for the HDPF are a sound starting point. The intention has been to narrow down the objectives so that they only deal with sustainability issues that are within the plan's remit. In doing so several matters have been scoped out from the overarching Sustainability Objectives to greater or lesser extent, the reasons for doing so are set out below:

Matter Scoped Out	Reasoning
Delivering a range of housing sizes and types including affordable housing	The Local Plan, having undertaken detailed research, sets clear guidance on the levels of affordable housing and suitable housing mix across the District. There is no intention to introduce conflicting standards within this plan and so it can be assumed that all development that comes forward will score positively against this matter as it should be consistent with existing planning policy within the Development Plan.
Carbon emissions, adapting to the likely changes in the future climate and promotes the supply of renewable, low carbon and decentralised energy.	These matters are considered in detail in the existing Development Plan and current Building Regulations (that fall outside of the planning system). All development should come forward in accordance with the development plan and as a result would be expected to score positively against this if assessed.

4.5 The proposed sustainability SA/SEA Objectives are set out below alongside their relevance to the environmental, social or economic themes of sustainable development.

No.	Objective	Environmental	Social	Economic
1.	Ensure that future development strikes the correct balance between economic, social and environmental priorities that is supported by, and brings together, the local community.	\checkmark	\checkmark	\checkmark
2.	To support a sustainable local economy that meets the needs of the people living and working within the parish.		\checkmark	\checkmark
3.	To sustain Henfield as a village hub, enhancing the range of services, facilities and public transport links available to everyone.		\checkmark	\checkmark
4.	To provide an appropriate amount of housing, as agreed with Horsham District Council, to meet the needs of the parish and the wider district.		\checkmark	
5.	To ensure new housing is appropriate for the needs of parish residents.		\checkmark	
6.	To ensure new developments respect environmental capacity and which have appropriate infrastructure, services and facilities in place, or where these can realistically be provided; and to encourage the appropriate reuse of brownfield sites in sustainable locations	\checkmark		
7.	To protect, enhance and, where appropriate, secure the provision of additional accessible community services, facilities, open spaces and infrastructure to meet the needs of the current and future population.		\checkmark	
8.	To safeguard and enhance the character and built heritage within the parish.	\checkmark	\checkmark	
10.	To ensure that development avoids negative impacts on the countryside	\checkmark	\checkmark	
11.	To safeguard and enhance the environmental quality of the parish, and its surrounding area and minimise the impact on environmental quality including air, soil, and water quality.	\checkmark		
12.	To reduce the risk of fluvial and surface water flooding within the parish and further downstream.	\checkmark		
13.	To protect biodiversity, and green infrastructure with particular reference to designated areas and identified priority habitats within and near the plan area.	\checkmark		

5.0 PROPOSED SA/SEA STRUCTURE AND METHODOLOGY

5.1 Moving forward this assessment will consider how the proposed Henfield Neighbourhood Plan scores against the Sustainability Objectives set out above. This section summarises the approach intended to be taken:

Consideration of reasonable alternatives

- 5.2 The first step will be to consider the issues and options facing the parish and the best way to address these. For each major policy direction a number of alternatives will be considered.
- 5.3 It should be noted that 'alternatives are not needed for every plan issue. A 'policy versus no policy' comparison of alternatives is necessary only where 'no policy' is under active consideration by the planning team. Where only one alternative is reasonable, then looking at other alternatives is not 'reasonable'. Not meeting objectively assessed housing need and going against Government policy are also generally not 'reasonable'.²
- 5.4 Where an alternative is considered unreasonable, the reasons for this will be clearly documented and could relate to a wide range of factors.
- 5.5 With regard to the consideration of development sites, it is envisaged that potential sites will be screened out from appraisal if the latest Strategic Housing Land Availability Assessment (SHLAA) or their own assessments have identified them as being unsuitable, unachievable or undeliverable.
- 5.6 The preferred alternatives will be selected by the Steering Group and a draft plan prepared

Consideration of effects

5.7 Once a draft plan has been prepared its effects need to be assessed.

Assessment of plan policies

- 5.8 The chosen policies will be considered against the Sustainability Objectives using a ++ / + / 0 / / -- scale to indicate Very Positive effects through to a Very Negative effect.
 Where the effect is uncertain a ? would be used.
- 5.9 A judgement will be made regarding the significance of each effect and this will be clearly set out. Broadly speaking the significance of an effect will relate to ;
 - The magnitude of the effect

² <u>STRATEGIC ENVIRONMENTAL ASSESSMENT - Improving the effectiveness and efficiency of SEA/SA for land</u> <u>use plans 2018</u>. Commissioned by RTPI South East and Written by Levett-Therivel

- The sensitivity of the receiving environment, including the value and vulnerability of the area, exceeded environmental quality standards, and effects on designated areas or landscapes
- Effect characteristics, including probability, duration, frequency, reversibility, cumulative effects, transboundary effects, risks to human health or the environment, and the magnitude and spatial extent of the effects.

Cross-border effects

5.10 Should the plan give rise to any significant effects outside of the plan area these will be identified and the approach to address these effects will be clearly documented. The relative proximity to areas of land within Mid Sussex District as well as parishes within HDC will be considered, with neighbouring Districts and Parishes will be consulted during the plan preparation process including any cumulative impacts that may arise as a result of development proposals in these areas (see para 5.12)

Mitigation of effects

- 5.11 Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of SEA/SA. Mitigation includes deleting or adding policies, and changing policy wording. Where mitigation is required it will be considered using the following hierarchy:
 - i. Avoid effects altogether
 - ii. Reduce/minimise effects,
 - iii. Offset effects (allow negative effects to happen but provide something positive to make up for it)

Total, Cumulative and In-Combination effects

- 5.12 Once the above has been considered the total cumulative and in-combination effects of the plan will be considered by compiling one table of all the proposed policies' effects and summarising the total and cumulative effects of the plan. The difference between these two assessments are:
 - Total effects are all of the plan's effects
 - **Cumulative effects** are all of the plan's effects plus all other actions not influenced by the plan, including people's behaviour and other underlying trends. They can arise where several developments each have insignificant effects but together have a significant effect,;
 - **In-Combination (or Synergistic) effects** are when effects interact to produce a total effect greater than the sum of the individual effects.

Plan Review

5.13 The results of the SA/SEA will be used to review and update the proposed plan as necessary to ensure that the plan provides an appropriate approach to securing sustainable development across the plan area.

