

## **Henfield Neighbourhood Development Plan**

### **Strategic Environmental Assessment (SEA): Post Adoption Statement Nov 2021**

The Henfield Neighbourhood Development Plan was ‘made’ on the 23 June 2021 and now forms part of the Development Plan for the determination of planning applications in the Henfield Parish.

This statement has been prepared in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), which require a statement to be produced on adoption of a plan or programme, to detail:

1. *‘How environmental considerations have been integrated into the plan or programme?’*
2. *How the environmental report has been taken into account?*
3. *How opinions expressed in response to*
  - a. *The invitation referred to in regulation 13(2)d;*
  - b. *Action taken by the responsible authority in accordance with regulation 13(4);**Have been taken into account*
4. *How the results of any consultations entered into under regulation 14(4) have been taken into account;*
5. *The reasons for choosing the plan or programme as adopted – in light of other reasonable alternatives dealt with;*
6. *The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.’*

This statement addresses each of these points in turn:

#### **1. How have environmental (sustainability) considerations been integrated into the Made Neighbourhood Development Plan?**

The Draft Scoping Report ‘State of the Parish’ was published in Feb 2018 and provided a collection of baseline data for the Parish. The document sought to establish the key sustainability challenges facing the Parish of an economic, environmental and social nature. The Strategic Environmental Assessment (SEA) for the Henfield Parish Neighbourhood Plan sets out the baseline information about Henfield as the Neighbourhood Plan Area. The Plan identifies the environmental issues affecting the

plan area. As required by the regulations, SEA has been developed as an iterative process and has informed decision making at every stage of developing the Henfield Neighbourhood Plan. Additionally, the Henfield Neighbourhood Plan SEA has been informed through detailed Evidence Base Documents which identify key plans, policies, and guidance, which have influenced the content of the Neighbourhood Plan. The issues identified informed the setting of environmental objectives (Fig 1. 12 Sustainability Objectives), which the objectives for the Henfield Neighbourhood Plan were assessed against. These objectives have helped ensure that the most sustainable location options were identified. The identification of environmental issues also helped shape the policy requirements for each site that is allocated or identified in the Henfield Neighbourhood Plan. Below are the 12 objectives in the Henfield SEA report to which all allocations and policies have been assessed against.

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.	✓	✓	✓
2.	To support a sustainable local economy that meets the needs of the people living and working within the parish.		✓	✓
3.	To sustain Henfield as a village hub, enhancing the range of services, facilities and public transport links available to everyone.	✓	✓	✓
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.		✓	
5.	To ensure new housing is appropriate for the needs of parish residents.		✓	
6.	To ensure new developments have appropriate infrastructure, services and facilities in place, or where these can realistically be provided; and to encourage the appropriate re-use of brownfield sites in sustainable locations	✓	✓	
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.		✓	
8.	To safeguard and enhance the character and built heritage within the parish.	✓	✓	
9.	To ensure that development avoids negative impacts on the countryside	✓	✓	
10.	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.	✓		
11.	To reduce the risk of fluvial and surface water flooding within the parish and further downstream.	✓		
12.	To protect biodiversity, and green infrastructure with particular reference to designated areas and identified priority habitats within and near the plan area.	✓		

Fig 1. 12 Henfield Sustainability Objectives

**2. How has the SEA Report been taken into account through the preparation of the Made Neighbourhood Development Plan?**

The production of the Sustainability Appraisal Report incorporating Strategic Environmental Assessment (SEA) for the Henfield Neighbourhood Development Plan 2017-2031 has been an iterative process, carried out concurrently with the

development of the Henfield Neighbourhood Development Plan. The SA/SEA process began with the production of the Scoping Report for Henfield Village (Feb 2018).

The SEA process contributed to the development of the Henfield Neighbourhood Plan by providing an assessment of all reasonable policy and potential site options (23 sites were assessed). In this assessment, the SA Framework was used to compare each policy option alongside reasonable alternatives (section 5), and the option of having no Neighbourhood Plan at all. The significant effects of the options were identified and those which had the most potentially negative impacts were not recommended for inclusion within the Henfield Neighbourhood Plan. The outcome of this assessment is documented within Section 5 and Section 6, the Assessment of Neighbourhood Plan allocation and policies in the final SA/SEA Report.

For certain policies, potential negative impacts on the environment were identified; however, it was possible to overcome these impacts through the use of appropriate mitigation. For example, Policy 2.1 (Parsonage Farm) was revised to help mitigate significant negative visual impacts of development on the wider countryside and flood risk on the northern boundary of the site through the proposed implementation of a countryside park which would be a visual buffer for the development, provide valued amenity space, increased biodiversity and avoid development on flood risk areas.

The Henfield SA/SEA Report demonstrates how sustainability considerations have been taken into account and provides an audit trail and formal statement on the consideration and assessment of all policy options.

**3. How have opinions expressed in response to the following matters been taken into account in the production of the 'Made' Neighbourhood Development Plan?**

- a. Various consultation has been undertaken with members of the public and statutory consultees during the Scoping Report, Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) draft-submission consultation and Regulation 16 submission-draft consultation;
- b. Amendments made by the Parish Council in response to comments made on the documents which were made available in its principal office during Regulation 14 consultation. Viewings was subject to COVID restrictions with deposit points carrying the consultation documents made available by appointment only following discussion with HDC. Every reasonable step was taken to ensure safety was paramount and in accordance with government guidance at the time.

**4. How the results of any consultations entered into under regulation 14(4) (cross-boundary consultations with neighbouring Parishes/ Districts) have been taken into account;**

**Key Environmental Bodies**

The Strategic Environmental Assessment Directive requires that the authorities referred to in article 6(3) shall be consulted when deciding upon the scope and level of detail of the information to be included in the SA/SEA (Environmental) Report. In England the statutory consultees are the Environment Agency, English Heritage (now known as Historic England) and Natural England. The Statutory Consultees, together with any locally significant stakeholders were consulted on the SEA.

**Public Consultation**

The SA/SEA of the Henfield Neighbourhood Plan was consulted upon along the Henfield Neighbourhood Plan for a minimum six weeks at the Neighbourhood Plan Regulation 14 stage, on 22 June 2019 – 17 August 2019. Following consultation on the Regulation 14 Submission Draft of the plan it was recommended that five of 23 sites be re-introduced into the assessment process as their boundaries now either abut sites which have planning permission or could be grouped into a wider cluster of sites that abut the built up area boundary meaning they could be in conformity with Policy 3 of the HDPF. As a result, Sites A, B, DD and K1 were been added back into the Sustainability Appraisal process and they were re-consulted (addendum to the Henfield SEA) for eight weeks alongside the Neighbourhood Plan Regulation 16 Publicity Period, on 8 November to the 20 December 2019. Examination was undertaken by independent examiner Andrew Ashcroft and a report was received on the 11 May 2020.

**Neighbouring Authorities**

All neighbouring authorities was consulted on the initial scope of the SA/SEA and the Regulation 14 and 16 Consultations.

No comments were received from neighbouring parishes specifically on the SA/SEA or Environmental objectives.

**5. What were the reasons for choosing the Plan as adopted – in light of other reasonable alternatives dealt with?**

The Environmental Assessment of Plans and Programmes 2004 (12) (2) requires

environmental reports to examine reasonable alternatives for the plan or programme whilst taking into account the objectives and scope of the plan or programme. This statement is required to set out the reasons for choosing the plan or programme as 'made' in light of other reasonable alternatives dealt with.

The final assessment in the SEA demonstrates that the policies in the HNP make a positive contribution towards the achievement of sustainable development. They are expected to have a number of positive effects. Mitigation has been applied where negative effects are present and all are considered capable of being mitigated in full. In total, 10 options were considered and assessed. Option 5 was considered the most appropriate option to take forward. Option 5 provides a new road access on to the A281, which minimises impacts on the existing community and their amenities. There is provision of a country park which will be a significant community asset and will be a buffer to limit the impact on the wider open countryside. It also delivers development at a consistent density to other greenfield sites tested in other options. Neighbourhood Plans do not need to select the most sustainable option, if mitigation measures can be used to improve a reasonable alternative. It is only necessary that reasonable alternatives, are selected and justified. NPPG guidance states the following regarding SEA/SAs:

*'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.'*

The SEA report demonstrates how the process has been tackled by the Henfield Neighbourhood Plan Steering Group with consideration of a wide range of options and to select the most appropriate option, given the reasonable alternatives. In the context, Option 5 was found to be the most appropriate option and could be adequately mitigated to ensure that the allocation meets with the sustainability objectives of the Neighbourhood Plan.

**6. What measures are to be taken to monitor the significant environmental effects of the implementation of the plan or programme?**

The SEA process does not finish with the publication of the document. Under Regulation 17 of the Environmental Assessment of Plans and Programmes Regulation 2004, the HNP will be subject to on-going monitoring. This will be carried out by jointly Henfield Parish Council and Horsham District Council. The latter will monitor the continuing suitability of the Neighbourhood Plan's policies, including in terms of significant environmental effects, through its Local Plan Monitoring Report.

The policies associated with the site allocations in the HNP will be monitored by the Parish Council through its assessment of the planning applications for the allocated sites. The Parish Council will expect the conditions associated with granting of planning permission by HDC to fully reflect those policies.