



Warnham Neighbourhood Development Plan

Strategic Environmental Assessment (SEA): Post Adoption Statement September 2019

The Warnham Neighbourhood Development Plan was 'made' on the 26 June 2019 and now forms part of the Development Plan for the determination of planning applications in the Warnham 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?

In February 2015 Warnham Parish Council prepared a Sustainability Appraisal Scoping report to support the development of the emerging Neighbourhood Development Plan (NDP). This document summarised the baseline data for the neighbourhood plan area in order to establish the context in which the NDP would be prepared. This information was used to identify the key environmental, social and economic issues affecting the parish including housing, biodiversity, heritage and landscape. These issues were then translated into SA Objectives used to assess the sustainability performance of the Neighbourhood Plan as it was developed. The

ten sustainability objectives used to assess the sustainability of the developing plan are set out below;

Figure 1: SA Framework

Residential Development
<p>Objective 1: To ensure that future development is consistent with protecting and maintaining the largely rural character of the parish.</p> <p>Objective 2: To promote a balance of social mix and age distributions within the parish.</p> <p>Objective 3: To safeguard the parish character and heritage with particular regard to design and development in the Conservation Area.</p> <p>Objective 4: To avoid housing development in areas prone to flooding or overflown by established flight paths.</p>
Countryside and Environment
<p>Objective 5: To protect the natural environment and tranquillity of the parish.</p> <p>Objective 6: To conserve and enhance areas of natural habitat.</p>
Local Economy
<p>Objective 7: To encourage appropriate businesses within the parish.</p>
Transport and Movement
<p>Objective 8: To encourage cycling, walking and public transport services.</p> <p>Objective 9: To address traffic and parking issues in the parish.</p>
Community Cohesion
<p>Objective 10: To maintain and foster Warnham’s community spirit.</p>

Using sustainability objectives which reflected the current environmental issues ensured that the most sustainable options were taken forward. Generally these options were the most beneficial/least detrimental in environmental, economic and social terms. For example the site assessment criteria set out in the Scoping Report was then used in the Site Assessment Report, March 2016. This includes the following:

- Is site in a sustainable location?
- Are there significant negative social or environmental impacts of site development
- Do the short-listed sites provide sufficient land to enable the identified housing needs to be met?

These criteria principally resulted in a number of sites not being included in the Neighbourhood Plan e.g. Land at Field Place Farm, Land north of Pryors Wood, Land at Tickfold Farm.

In February 2015 Action in Rural Sussex (AiRS) were commissioned to undertake a Housing Needs Survey, which saw a total of 250 people respond. The responses were collated and published in July 2015 and a summary is available to view in the Warnham Neighbourhood Plan Consultation Statement, July 2018 (para 3.4). The survey identified residents' wishes that helped to shape the policies of the plan. Of those who responded, 70% were in favour of smaller affordable housing developments, whilst 37% were in favour of additional market housing. The Plan provides for 50 houses with 35% affordable housing in line with Policy 16 of the Horsham District Planning Framework as stipulated in Policy W6 (1) (b).

The SA/SEA process involved identifying and analysing all the plans, programmes and policies which could impact the Warnham Neighbourhood Plan. Specifically, these included The Horsham District Planning Framework (2015) and evidence base documents including the Horsham Landscape Character Assessment 2014 and Horsham Strategic Housing Land Availability Assessment 2014.

After considering the Examiner's recommendations the District Council, with the agreement of the Parish Council, decided to accept all modifications put forward by the Examiner. The decision statement was published on the 12 April 2019 and informed stakeholders and the wider public that the plan would proceed to referendum.

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

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

The SA process contributed to the development of the Warnham Neighbourhood Plan by providing an assessment of all reasonable policy and potential site options. In this assessment, the SA Framework was used to compare each policy option alongside reasonable alternatives, 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 Warnham Neighbourhood Plan. The outcome of this assessment is documented within section 8 Assessment of

Neighbourhood Plan 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 1 provided criteria to help mitigate negative impacts on environment, biodiversity and landscape setting such as retention of existing mature hedgerow.

The 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.

The SA/SEA process began with the production of the SA Scoping Report (2016). The SA/SEA Report was prepared alongside the Warnham Neighbourhood Plan by Warnham Parish Council. It was reflected within and supported the draft Warnham Neighbourhood Plan that was subjected to public consultation both at the Neighbourhood Plan Regulation 14 Pre Submission Stage and the Regulation 16 Publicity Period conducted by Horsham District Council as the Local Planning Authority.

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. There have been two rounds of consultation on this plan undertaken with members of the public and statutory consultees. The first Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) draft-submission consultation which also included consultation on the SA/SEA Scoping Report and the Regulation 16 submission-draft consultation;
- b. The actions taken by the Parish Council in response to comments made on the documents were made publically available in the Parish Councils principal office and local shop and pub.

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 partners were consulted on the SA Scoping Report in March 2016 for a period of 5 weeks. There was no feedback received from Historic England. Feedback received from Natural England stated that the document appeared to deal reasonably with the natural environment, indicating that the plan would likely lead to protection and enhancement of designated and otherwise important landscapes. Feedback received back from the Environment Agency recommended that an objective be added to protect and enhance the environment, flood risk criteria for an objective become an objective and SEA takes account of relevant policies, plans and strategies including local Strategic Flood Risk Assessment. All of these recommendations were accepted.

Public Consultation

The SA/SEA of the Warnham Neighbourhood Plan was consulted on for six weeks alongside the Warnham Neighbourhood Plan as part of the Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) draft-submission consultation between March 17 2018 - 30 April 2018

and then again for a further six weeks between the 17 August 2018 – 12 October 2018 as part of the Regulation 16 Publicity Period, for the Independent Examination. After the Examiner published his report with the recommendation that the plan proceed to referendum, subject to modifications.

A summary of all bodies consulted on the Warnham Neighbourhood Development Plan and SA/SEA Report is included in the Warnham Parish Neighbourhood Plan Consultation Statement, 2017.

Neighbouring Authorities

Horsham District Council 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 Sustainability Objectives in the SA Framework were used to assess the overall sustainability performance of the proposed plan against alternative options, one which promoted a balance of social mix and age distributions within the parish. The assessment concluded that overall sustainability performance rates were better for the proposed policy which sought a housing mix which met the local housing need therefore this option was carried forward to adoption.

The Warnham Neighbourhood Plan has been ‘made’ on the recommendations of a suitably qualified Independent Examiner. During the Neighbourhood Planning process three separate consultations were held. The first was that of the Sustainability Scoping Report to consider the baseline data and sustainability objectives. The second included the Neighbourhood Plan with its policies and site allocations which had been tested against reasonable alternatives set out above and the final on The Neighbourhood Plan and Sustainability Appraisal which was published for one round of consultation prior to the Independent Examination. Subsequently changes and modifications were incorporated at each stage to take into account representations received.

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

The SA/SEA process identified a number of mitigation measures required to improve the overall sustainability performance of the plan. As such the SA/SEA process does not finish with the publication of this SA/SEA Report. The effect the Warnham Neighbourhood Plan has on the environment will need to be monitored using the Sustainability Objectives identified in the Warnham SA Scoping Report. Linked to the sustainability objectives are a number of indicators that, where feasible, will be included within Horsham District Council’s annual Authority Monitoring Reports. The results of this monitoring will then be considered and used to inform any review of the Warnham Neighbourhood Plan. This will

also ensure that any unforeseen effects, which have not been identified in the SA/SEA Report, can be acted upon in a timely manner.

The policies associated with the site allocations in the Plan 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.

** The HDPF Monitoring Framework identifies the District wide indicators which will be used;
Horsham District Planning Framework Monitoring Framework July 2014 CD/LP/25 (available upon request)*