

Thakeham Parish Neighbourhood Plan 2031

Sustainability Appraisal/Strategic Environmental Assessment



Published by Thakeham Parish Council for examination under the Neighbourhood Planning (General) Regulations 2012 and in accordance with EU Directive 2001/42 and the Environmental Assessment of Plans & Programmes Regulations 2004

Sept 2015

NON TECHNICAL SUMMARY

1. The purpose of this Sustainability Appraisal report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission Neighbourhood Development Plan for Thakeham Parish.

2. This Sustainability Appraisal report is a systematic process used to ensure the social and economic objectives of a plan are achieved in addition to environmental considerations. For completeness, the Neighbourhood Plan has been subject to a combined process whereby a Strategic Environmental Assessment (SEA) has been incorporated with a Sustainability Appraisal (SA/SEA) to consider the wider social and economic effects.

3. The Neighbourhood Plan contains a number of policies for the use and development of land in the Parish of Thakeham in the plan period to 2031. These policies, together with the policies of the Development Plan - that is the policies of the 2007 Horsham Local Plan to be replaced shortly by the Horsham District Planning Framework (HDPF) - and the National Planning Policy Framework (NPPF), will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the HDPF.

4. Neighbourhood Plans are being prepared for the adjoining parishes of Storrington/Sullington and Washington (SSWNP) and West Chiltington, both in accordance with strategic policy frameworks of the Core Strategy and the HDPF. The Pre Submission SSWNP was consulted on at the same time as this Neighbourhood Plan. It contains a series of proposals for a modest but sustainable level of housing development and for changes to a number of current employment areas. The proposals are in keeping with the status of Storrington/Sullington in the settlement hierarchy.

5. The over-riding sustainability issue in the Parish to which the Neighbourhood Plan responds is the scale of recent housing development schemes with planning consent. At over 220 new homes outside of Thakeham village, this scale represents a 32% increase in the number of homes in the Parish, for which the local infrastructure is not well-prepared. Such development will also be a significant incursion into the countryside around the village and will change the character of the place.

6. Thakeham is located within the 15km zone of influence of a site of European importance, the Arun Valley SAC/SPA/Ramsar site. Given the modest scale of development supported by the Neighbourhood Plan, Natural England has confirmed that a Habitats Regulations Assessment is not required. There are no local nature reserves, Sites of Special Scientific Interest (SSSI), Areas of Outstanding Natural Beauty (AONB) or Local Nature Reserves (LNR) in the Parish. The Parish contains three Grade I, one Grade II* and a large number of Grade II listed buildings and structures. The main part of Thakeham village is designated a Conservation Area. There are no scheduled monuments in Thakeham.

7. There are no existing social, economic or environmental problems that affect the neighbourhood area to which the Neighbourhood Plan is intending to respond, other than to refine the management of development proposals alongside other Development Plan policies. The Thakeham Tiles site is not an ideal neighbouring use to residential areas. However, the site and operations are well contained and the intent of the policy is not to remove a problematic, unneighbourly use but to encourage and

enable the occupier to find a better located and suitable site for expanding the business.

8. The Neighbourhood Plan has been prepared alongside the emerging HDPF, which contains all the appropriate strategic policies to address social, economic and environmental issues across the District, including the Neighbourhood Plan area. The Neighbourhood Plan must be in general conformity with those policies and it does not therefore seek to repeat them. To assess the sustainability performance of the Neighbourhood Plan, the proposed framework was derived from the relevant objectives of the HDPF to ease data reporting and comparison if appropriate and there appeared to be no value in 'reinventing the wheel'.

9. The twelve strategic objectives of the Neighbourhood Plan cover a range of economic, social and environmental issues in support of realising the community's vision for the Parish. In all respects, the relationship between the Neighbourhood Plan objectives and the sustainability framework is complementary, with the prospective of a number of positive impacts. At the very least, impacts will be neutral. Unsurprisingly given the focus of the Plan, there is an especially strong correlation between the SA/SEA's landscape objective and a number of the Plan's objectives.

9. The assessment of Policy 1 – Spatial Plan shows how its overall sustainability performance rates well against the alternative options and how the policy avoids any negative impacts. It scores especially well in respect of meeting local housing needs, protecting the most important and valued landscapes and conserving cultural heritage. It does so by remaining consistent with HDPF Policy 3 and Policy 4 in respect of identifying housing land immediately adjoining existing settlements of a scale that reflects the character of the settlement. It therefore provides a sustainable framework for the development proposals of the Neighbourhood Plan.

10. The Neighbourhood Plan contains fourteen policies, which have a series of social, environmental and/or economic impacts. The Spatial Plan of Policy 1 assesses especially well against the SA/SEA objectives, with likely positive effects in supplying new homes on the one hand (and particularly in reusing brownfield land) but also in primarily confining major development within the existing settlement boundaries, thus avoiding losses of biodiversity, a deterioration of landscape quality or harmful impacts on heritage assets. The only reasonable alternative to the spatial plan was for the policy to allow for settlement boundary changes to accommodate extensions of Storrington/Sullington, Thakeham and West Chiltington villages into the surrounding countryside in proportion to their existing scale and position in the settlement hierarchy. The assessment shows this option would have resulted in a greater number of new homes being provided for – perhaps as many as another 60-80 homes – and so is assessed as positive in housing supply terms. However, it is unlikely that further Greenfield encroachments by development into the countryside around the settlements could be achieved without consequences for the rural character of the Parish in those locations, and this alternative has therefore been assessed as negative in those respects.

11. In overall terms, therefore, the policies of the Plan should deliver a number of positive effects against the SA/SEA objectives. Importantly, no policy is assessed as

having any negative effects on those objectives. Further, the scale and location of specific development policies (Policies 2, 3 and 4) is such that there should be no cumulative effects on the objectives and nor with the effects of policies contained within the adjoining neighbourhood plans.

12. The reasonable alternative to all the other policies was for the Plan to remain silent in those respects. Such alternatives would generally be unlikely to have any serious consequences given the adopted policies of the Core Strategy and Development Management DPDs will continue to inform decisions on planning applications. Almost all policy alternatives are therefore assessed as having a neutral effect.

13. In overall terms, therefore, the environmental impacts of the Neighbourhood Plan are generally assessed as neutral but often positive. The proposed mitigation measures of most policies will effectively avoid any negative impacts. Only in respect of the reasonable alternatives are there any negative potential impacts.

14. The Parish Council will monitor the progress in the implementation of the Neighbourhood Plan using the measures identified in Table A. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data on an annual basis to report on the progress of the plan. It is likely the Parish Council will choose to review the Neighbourhood Plan on a five yearly cycle and it will be informed by this monitoring activity in considering if and how to update the policies.

1. Introduction

1.1 The purpose of this Sustainability Appraisal report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission Neighbourhood Development Plan for Thakeham Parish ("the Neighbourhood Plan") in accordance with the Neighbourhood Planning (General) Regulations and the EU Directive 2001/42 on strategic environmental assessment (SEA). Plan A overleaf shows the designated Neighbourhood Area.

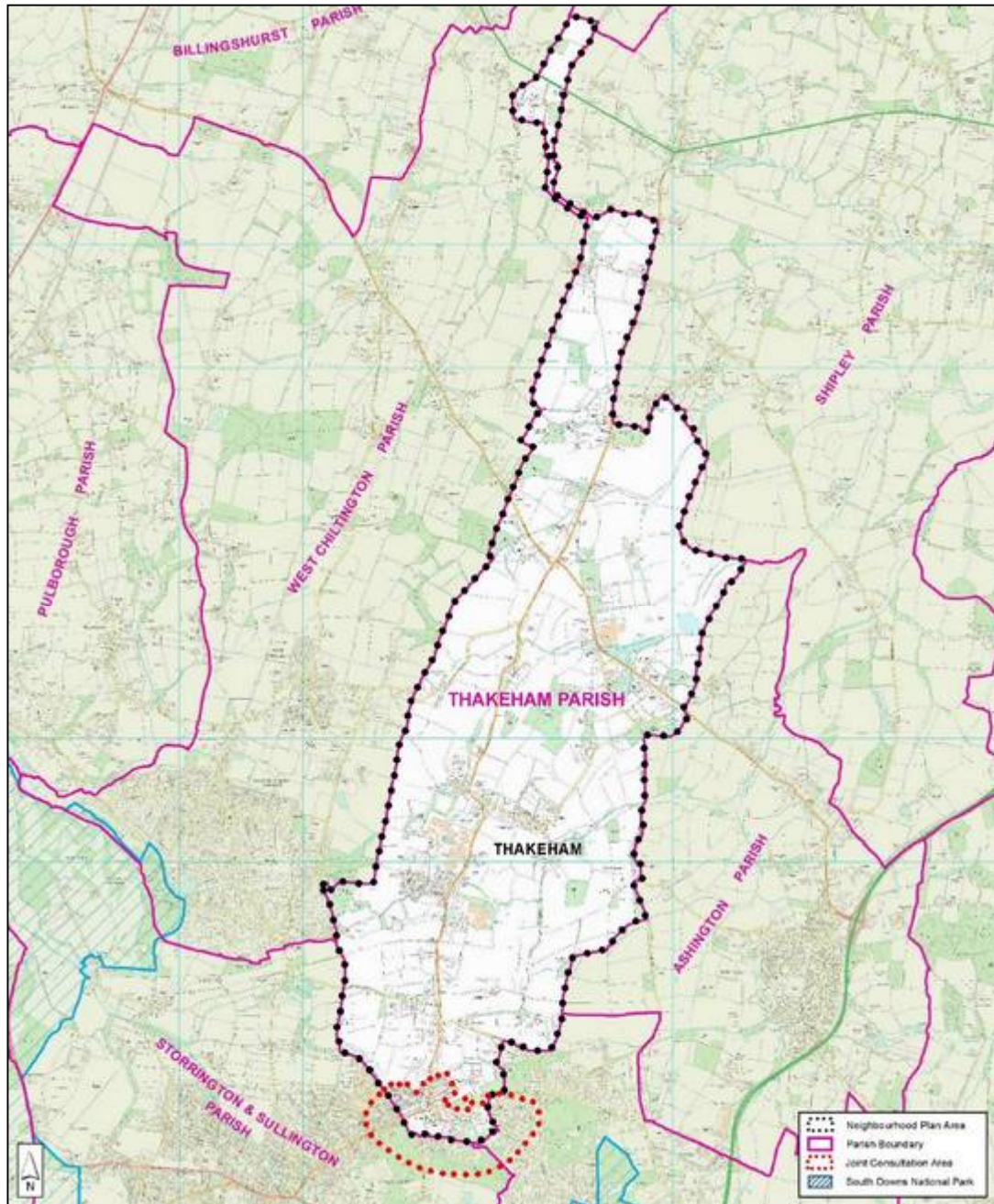
1.2 The Neighbourhood Plan has been published for submission by Thakeham Parish Council ("the Parish Council") to the local planning authority, Horsham District Council ("the District Council"), under the Neighbourhood Planning Regulations 2012. The District Council has issued a screening opinion requiring an SEA and the Parish Council has chosen to meet this obligation by preparing a Sustainability Appraisal (SA) under the Environmental Assessment of Plans & Programmes Regulations 2004.

1.3 A Sustainability Appraisal is a systematic process used to ensure the social and economic objectives of a plan are achieved in addition to environmental considerations. For completeness, the Neighbourhood Plan has been subject to a combined process whereby the SEA has been incorporated with a Sustainability Appraisal (SA/SEA) to consider the wider social and economic effects.

1.4 A Scoping Report (as part of Stage A of the process – see Figure B below) was consulted on in October-November 2014 in line with the Regulations. The comments received on the proposed scope of sustainability objectives were supportive – the objectives are set out in Section 7 of this report.

1.5 The Parish Council consulted on a Pre Submission version of the Plan in January 2015 for the statutory six week period. This was informed by the SA/SEA objectives of the Scoping Report (as Stage B of the process). The Plan this was accompanied by a draft SA/SEA report (as Stages C and D of the process), the comments during which have both led to minor modifications of the Plan and of this final version of the SA/SEA report. The ongoing monitoring of the effects of implementing the Plan (Stage E of the process) are covered in section 8 of this report).

1.6 The report provides an assessment of the Neighbourhood Plan objectives and policies and seeks to do in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The social, economic and environmental baseline data is contained in the Thakeham Neighbourhood Plan 2015-2035: State of the Parish Report, which is available in the evidence base.



Plan A: The Designated Thakeham Parish Neighbourhood Area

2. Background to Sustainability Appraisal & Strategic Environmental Assessment

2.1 Through the SA/SEA the social, environmental and economic effects of the Neighbourhood Plan are tested to ensure that these promote sustainable development or at the very least that they avoid any significant environmental effects.

2.2 The combined process involves a simple evaluation of the social, economic and environmental impacts of a plan as follows:

- An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes

- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- The social, economic and environmental characteristics of areas likely to be significantly affected
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
- The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation
- The likely significant effects on the local economy, society and the environment
- The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects of implementing the plan
- 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
- A description of measures envisaged concerning monitoring.

2.3 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan in a relatively small Parish area. The SA/SEA report of the Horsham District Planning Framework includes the following summary of the process:

| Table 1: The Combined SA/SEA process | |
|---|---|
| Scoping | <p>Stage A: This stage sets the context of the assessment by identifying the baseline data and establishing the scope of the assessment.</p> <ol style="list-style-type: none"> 1. Identification of relevant plans, policies and programmes. Any existing requirements that need to be taken into account or incorporated into the plan are identified. 2. Review of baseline information. Data about environmental, social and economic issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation. 3. Identification of Sustainability Issues – the review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan; 4. Development of the SA Framework: The Assessment criteria used to assess the impact of the plan or programme. 5. Identification of initial Plan Options: Taking into account best practice, initial identification of options and reasonable alternatives is undertaken. 6. Consultation on the scope and alternatives for assessment - it is necessary to consult Statutory Consultees; Natural England, English Nature and the Environment Agency at this stage. |
| Assessment | <p>Stage B: This stage involves the assessment of any likely significant effects of plan options and alternatives on the key sustainability issues identified.</p> <ol style="list-style-type: none"> 1. Finalisation of Plan options and alternatives for testing 2. Testing the Plan objectives against the SA Framework; The plan Objectives are tested to ensure compliance with sustainability principles. 3. Evaluation of plan options and alternatives; The SA Framework is used to assess various plan options by identifying the potential sustainability effects which may arise from the plan. 4. Predicting and evaluating the effects of the plan; To predict the significant effects of the plan and assist in the refinement of the policies 5. Consideration of ways to mitigate adverse effects and maximise beneficial effects; To ensure that all potential mitigation measures and measures for maximising beneficial effects are identified. 6. Proposing measures to monitor the significant effects of implementing the DPD; To detail the means by which the sustainability performance of the plan can be assessed and monitored. <p>This assessment is used to feed into the development of a plan or programme to help ensure the most sustainable option is selected. The SA Framework is also used to assess the sustainability implications of the draft policies and the results are used to inform policy development.</p> |

| | |
|---------------------------------------|---|
| <p>Reporting</p> | <p>Stage C: Preparation of the SA Report</p> <ul style="list-style-type: none"> The findings of the assessment together with how it has influenced the development of the plan are identified and set out in a draft environmental report together with the recommendations on how to prevent, reduce, or offset any significant negative impacts arising from the Plan. <p>Stage D: Consultation: Seek representations from consultation bodies and the general public.</p> <ul style="list-style-type: none"> This is an ongoing process. Consultation on the draft SA Report is undertaken alongside the publication of the any draft planning documents. The results are taken into account and used to influence further iterations of the sustainability appraisal process. |
| <p>Adoption and Monitoring</p> | <p>Stage E: Monitoring</p> <p>Following Examination, an assessment of any significant changes made to the plan is undertaken and the findings are reported in an SEA Post Adoption Statement.</p> <p>Following adoption of the Plan, the significant effects of implementing the plan are measured and any adverse effects are responded to. The results are fed into future plans and sustainability appraisals.</p> |

Figure B: SA/SEA Process

3. An outline of the contents, main objectives of the Neighbourhood Plan and relationship with other relevant plans or programmes

3.1 The Neighbourhood Plan contains a number of policies for the use and development of land in the Parish of Thakeham in the plan period to 2031. These policies, together with the policies of the Development Plan - that is the policies of the 2007 Horsham Local Plan to be replaced shortly by the Horsham District Planning Framework (HDPF) - and the National Planning Policy Framework (NPPF), will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the HDPF.

3.2 The vision of the TPNP is:

“The vision for Thakeham is to protect, maintain, enhance and improve our distinctive environment and community, to provide an outstanding quality of life for current and future generations of residents, to be socially and economically thriving and to conserve and protect our high quality natural environment, landscape, habitats and wildlife biodiversity. The Parish accepts the significant development at the start of the plan period, but wishes to see this development maintains the character of the Parish

through the adoption of appropriate building styles, low densities and open green spaces in order to mitigate its impact. “

3.3 The TPNP translates this vision into a series of strategic objectives and identifies key measures for each objective, as follows:

1. To ensure the scale of development is in keeping with the Parish. As recent large-scale housing approvals are beyond Thakeham's local housing needs for the plan period, new housing development in Thakeham is limited to appropriate windfall sites within the built-up area.
2. To ensure any new development within the built-up area is designed to a high quality which is sustainable, reflects the local character, density and distinctiveness of the area and contributes positively to the visual character of its local surroundings.
3. To ensure any new development within the countryside area is confined to uses which require a location in the countryside and benefits the countryside's landscape and economy in order to protect our valued landscape.
4. To support the local economy through its existing businesses and to encourage expansion of local employment within settlements.
5. To ensure any existing employment sites in the countryside which may become vacant are only used for appropriate, low impact, small scale and sustainable uses.
6. To offer greater protection to the retention of features important to the visual appearance and character of the area, including its built heritage, cherished views, woodlands, hedgerows, sunken lanes, natural habitats and watercourses.
7. To safeguard the best and most versatile agricultural land in order that it is available for sustained food production.
8. To protect natural existing ground water courses and their immediate surrounding vegetation in order to maintain essential ecosystem services, prevent water and soil pollution and to help retain the natural role in flood prevention provided by existing water courses.
9. To protect green open spaces used for sport and recreation.
10. To retain and, if possible, enhance local services and facilities and to ensure telecommunication links are of a high standard.
11. To improve local transport links and public right of way routes within the Parish and to adjacent parishes.
12. To ensure all new development and payments derived from development schemes benefit the Parish.

3.4 The Core Strategy (and the HDPF) provides a clear policy framework for securing sustainable development and the Neighbourhood Plan will be in general conformity with the provisions of that framework. It defines Thakeham village as a 'Category 2 Settlement' (which the HDPF defines as a 'Smaller Village') and Storrington/Sullington as a 'Category 1 Settlement' (a 'Larger Village') in its settlement hierarchy. It also establishes clear policies for the protection of the countryside and heritage character of the District.

3.5 The Core Strategy contains a range of strategic policies, although it could not have anticipated the advent of neighbourhood planning. Of most relevance to the Plan are the following policies:

- Policy CP1: Landscape & Townscape Character – protecting, conserving and enhancing landscape and townscape character and biodiversity
- Policy CP5: Built Up Areas & Previously Developed Land – defining Thakeham (The Street and High Bar Lane) and West Chiltington as Category 2 Settlements and Storrington/Sullington as a Category 1 Settlement for the purpose of locating new development of a scale appropriate to this settlement type and within its defined built up area boundaries
- Policy CP8: Small Scale Greenfield Sites – allowing for small scale extensions to the smaller towns and villages to meet identified local needs
- Policy CP9: Managing the Release of Housing Land – managing the release of land for housing for delivery over the whole plan period
- Policy CP12: Meeting Housing Needs – setting affordable housing provision on sites of 15 dwellings or more at 40%
- Policy CP14: Protection & Enhancement of Community Facilities & Services – encouraging proposals for new facilities and protecting existing facilities including open spaces
- Policy CP15: Rural Strategy – encouraging rural economic development in the defined settlements of Policy CP5

3.6 Neighbourhood Plans are being prepared for the adjoining parishes of Storrington/Sullington and Washington ("the SSWNP") and West Chiltington, both in accordance with strategic policy frameworks of the Core Strategy and the HDPF. The Pre Submission SSWNP was consulted on at the same time as this Neighbourhood Plan. It contains a series of proposals for a modest but sustainable level of housing development and for changes to a number of current employment areas. The proposals are in keeping with the status of Storrington/Sullington in the settlement hierarchy. Only one policy (in relation to the housing reuse of the former 'Paula Rosa' factory off Water Lane) is in close proximity to the Thakeham Parish boundary. The West Chiltington Neighbourhood Plan was published for consultation in July 2015.

4. The relevant aspects of the current state of the social, environmental and economic and the likely evolution thereof without implementation of the Neighbourhood Plan

4.1 The over-riding sustainability issue in the Parish to which the Neighbourhood Plan responds is the scale of recent housing development schemes with planning consent. At over 220 new homes outside of the built up area, this scale represents a 32% increase in the number of homes in the Parish, for which the local infrastructure is not well-

prepared. Such development will also be a significant incursion into the countryside around the village and will change the character of the place.

4.2 The Neighbourhood Plan has responded by seeking to contain any further growth within the defined built up area boundaries at Thakeham (and in that part of Storrington/Sullington in the Parish) and not providing for any additional housing greenfield development. This will not lead to an under-supply of housing in the Storrington/Sullington area as the Plan is making provision for new homes and it is anticipated that the adjoining Storrington/Sullington & Washington Neighbourhood Plan is making a number of proposals to allocate housing land in and around the edge of the village.

4.3 Specifically, the Neighbourhood Plan is seeking to plan for the relocation of one of the largest business uses in the Parish – Thakeham Tiles – which has expressed a desire for some time to relocate to a better site in this locality. The Plan therefore sets the framework for development to replace the loss of that use.

4.4 Without the Neighbourhood Plan, proposals for housing development in the Parish would be left to individual planning applications. This would make little difference to controlling the environmental impact of those proposals as they must in any event demonstrate they conform to the Development Plan and National Planning Policy Framework (NPPF) policy. Rather, the Plan emphasis is on delivering a series of proposals that have positive social and economic outcomes within the environmental limits imposed by the Core Strategy.

5. The environmental characteristics of areas likely to be significantly affected

5.1 Thakeham is located within the 15km zone of influence of a site of European importance, the Arun Valley SAC/SPA/Ramsar site. Given the modest scale of development supported by the Neighbourhood Plan, Natural England has confirmed that a Habitats Regulations Assessment is not required. There are no local nature reserves, Sites of Special Scientific Interest (SSSI), Areas of Outstanding Natural Beauty (AONB) or Local Nature Reserves (LNR) in the Parish. Some Priority Habitat areas have been identified by Natural England. There are Ancient & Semi-Natural Woodland and some Traditional Orchard Priority Habitats. Lots of areas of Deciduous Woodland Habitat spread in pockets across the Parish and elements of the Parish are part of the English Woodland Grant Schemes. Most of the central part of the Parish has the best quality soil in the District and has been classified as Grade 2 and 3a.

5.2 There are three landscape character areas which cover Thakeham Parish: E1- Parham and Storrington wooded farmlands and heaths; F1 – Pulborough, Chilmington and Thakeham Farmlands; and J2 – Broadford Bridge to Billingshurst Farmlands (as defined in the Horsham Landscape Character Assessment from 2014). Out of these three areas, the Parham and Storrington wooded farmlands and heaths E1 was assessed as being the area most sensitive to change. This is due to the quality of the landscape and the visibility from the escarpment to the south. This is the area that is the most southern of the three and extends into the neighbouring parish of Storrington and Sullington. The other two areas have a moderate sensitivity to change again due to the landscape quality and the visibility which are in general terms both lower than in area E1.

5.3 The Parish contains three Grade I, one Grade II* and a large number of Grade II listed buildings and structures. The main part of Thakeham village is designated a Conservation Area. There are no scheduled monuments in Thakeham though there is a Site of Archaeological Importance located to the west of Duke's Hill B2139 and Storrington Road B2139, just west of the Conservation Area.

6. Any existing social, economic or environmental problems that are relevant to the Neighbourhood Plan

6.1 Other than the circumstances described in Section 4 above, there are no existing social, economic or environmental problems that affect the neighbourhood area to which the Neighbourhood Plan is intending to respond, other than to refine the management of development proposals alongside other Development Plan policies.

6.2 The Thakeham Tiles site of Policy 2 is not an ideal neighbouring use to residential areas. However, the site and operations are well contained and the intent of the policy is not to remove a problematic, unneighbourly use but to encourage and enable the occupier to find a better located and suitable site for expanding the business. Similarly, the challenges of operating rural businesses is not ignored. Though those challenges are not special to this Parish, the Neighbourhood Plan has provided an opportunity to consider how to bolster economic development in key locations and to realise economics benefits from housing development (as in Policy 4).

7. The social, environmental and economic objectives that are relevant to the Neighbourhood Plan and the way those objectives and any considerations of its sustainability have been taken into account during its preparation

7.1 The Neighbourhood Plan has been prepared alongside the emerging HDPF, which contains all the appropriate strategic policies to address social, economic and environmental issues across the District, including the Neighbourhood Plan area. The Neighbourhood Plan must be in general conformity with those policies and it does not therefore seek to repeat them.

7.2 To assess the sustainability performance of the Neighbourhood Plan, the following assessment framework has been adopted. The proposed framework was derived from the relevant objectives of the HDPF to ease data reporting and comparison if appropriate and there appeared to be no value in 'reinventing the wheel'. They were consulted upon and endorsed by the statutory consultees as part of the SA/SEA Scoping Report.

| Neighbourhood Plan SA/SEA Objective | Neighbourhood Plan SA/SEA Measures |
|--|--|
| Housing | 1A - will the TPNP improve the availability of decent, affordable housing? 1B – will the TPNP provide a range of housing types of various sizes and tenures? 1C – will the TPNP make better use of brownfield land for housing? |
| Community Facilities | 2A - Will the TPNP sustain or increase the provision of community facilities? |
| Biodiversity | 3A - Will the TPNP lead to the loss to biodiversity, flora or fauna as a result of development, either directly or through habitat fragmentation? |
| Landscape | 4A - Will the TPNP result in a deterioration of the quality of the landscape or village-scape? |
| Heritage | 5A - Will the TPNP protect and enhance designated features of historical or cultural interest (e.g. Listed buildings, archaeological sites, ancient monuments, Conservation Areas?) 5B – Will the TPNP sustain and enhance the settings and views of heritage assets? |

Table A: Thakeham Parish Neighbourhood Plan SA/SEA Framework

7.3 The five objectives have been chosen to provide a relevant framework within which to distinguish policy attributes and to compare them with any reasonable alternative policy approaches. They reflect the environmental characteristics of the Parish and the intended focus of the Neighbourhood Plan. The absence of an objective does not necessarily mean that it is of no value but that its inclusion would not have helped the assessment of the Plan's objectives and policies.

7.4 Further, in most cases, it is acknowledged that data is not collected or reported at a parish scale to enable an accurate assessment. In addition, the scale of development proposed in the Neighbourhood Plan is too small in comparison with the scale of existing development in the Parish, making the identification of cause-and-effect relationships between inputs and outputs very uncertain. However, the assessment does seek to identify the relative attributes of the policies of the Neighbourhood Plan to inform the reader.

Assessing the impact of the Neighbourhood Plan Strategic Objectives

7.5 The twelve strategic objectives of the Neighbourhood Plan are outlined in para 3.3 above. They cover a range of economic, social and environmental issues in support of realising the community's vision for the Parish. Each of these objectives is assessed against the SA/SEA objectives in Table B below.

7.6 In all respects, the relationship between the Neighbourhood Plan objectives and the sustainability framework is complementary, with the prospective of a number of positive impacts. At the very least, impacts will be neutral. Unsurprisingly given the focus of the Plan, there is an especially strong correlation between the SA/SEA's landscape objective and a number of the Plan's objectives.

| | | Housing | Community Facilities | Biodiversity | Landscape | Heritage |
|----|----------------------------------|-----------|----------------------|--------------|-----------|-----------|
| | SA/SEA Objective | 1 | 2 | 3 | 4 | 5 |
| | TPNP Objectives: | | | | | |
| 1 | Scale of Housing Development | Positive | Mitigated | Mitigated | Positive | Mitigated |
| 2 | Design | Mitigated | Mitigated | Mitigated | Positive | Mitigated |
| 3 | Development in the Countryside | Mitigated | Mitigated | Mitigated | Positive | Positive |
| 4 | Local Economy | Mitigated | Mitigated | Mitigated | Mitigated | Mitigated |
| 5 | Employment in the Countryside | Mitigated | Mitigated | Mitigated | Mitigated | Mitigated |
| 6 | Character and Heritage | Mitigated | Mitigated | Mitigated | Positive | Positive |
| 7 | Agricultural Land | Mitigated | Mitigated | Positive | Positive | Mitigated |
| 8 | Water Courses | Mitigated | Mitigated | Positive | Mitigated | Mitigated |
| 9 | Green Spaces, Sport & Recreation | Mitigated | Positive | Mitigated | Positive | Mitigated |
| 10 | Village Viability & Vitality | Mitigated | Positive | Mitigated | Mitigated | Mitigated |
| 11 | Access | Mitigated | Positive | Mitigated | Mitigated | Mitigated |
| 12 | Developers Contributions | Mitigated | Mitigated | Mitigated | Mitigated | Mitigated |

| |
|--|
| Positive impact |
| No impact or some impact but mitigated |
| Negative impact |

Table B: Summary Assessment of Plan Objectives

Assessing the impact of the Neighbourhood Plan policies

7.7 The Neighbourhood Plan contains fourteen policies, which have a series of social, environmental and/or economic impacts. Using the sustainability framework of Table A,

the assessment of each policy is summarised below in Table C. The assessment is of the proposed policies with their mitigation measures.

| | PROPOSED POLICIES | Housing | Community Facilities | Biodiversity | Landscape | Heritage |
|----|---|----------------|---------------------------------|---------------------|------------------|-----------------|
| | SA/SEA Objective | 1 | 2 | 3 | 4 | 5 |
| | TPNP Policies | | | | | |
| 1 | Spatial Plan | Green | Orange | Green | Green | Green |
| 2 | Thakeham Tiles | Green | Orange | Green | Orange | Orange |
| 3 | Horticultural Land off Storrington Road | Orange | Orange | Orange | Green | Orange |
| 4 | Abingworth Nursery | Green | Green | Orange | Orange | Orange |
| 5 | Employment Sites | Orange | Orange | Orange | Orange | Orange |
| 6 | Design | Orange | Orange | Orange | Green | Green |
| 7 | Heritage Assets | Orange | Orange | Orange | Green | Green |
| 8 | Sub Division of Agricultural Land | Orange | Orange | Orange | Green | Orange |
| 9 | Development in the Countryside | Orange | Orange | Orange | Green | Orange |
| 10 | Green Infrastructure | Orange | Orange | Green | Green | Orange |
| 11 | Local Green Spaces | Orange | Green | Green | Green | Green |
| 12 | Community Facilities | Orange | Green | Orange | Orange | Orange |
| 13 | Broadband and Mobile Comms | Orange | Orange | Orange | Orange | Orange |
| 14 | Soils | Orange | Orange | Green | Green | Orange |

Table C: Summary Assessment of Proposed Policies

7.8 The Spatial Plan of Policy 1 assesses especially well against the SA/SEA objectives, with likely positive effects in supplying new homes on the one hand (and particularly in reusing brownfield land) but also in primarily confining major development within the existing settlement boundaries, thus avoiding losses of biodiversity, a deterioration of landscape quality or harmful impacts on heritage assets.

7.9 The support of Policy 2 for the reuse for housing of the current Thakeham Tiles site assesses well, in supplying new homes for the area and in ensuring biodiversity value retention, if not a net gain, by requiring a scheme to retain and improve the existing woodland that surrounds much of the site. Being inside the settlement boundary and not within the setting of a heritage asset, the policy is neutral in all other respects.

7.10 The support for the retention of the land at Storrington Road in Policy 3 for employment and horticultural uses is generally neutral in its effects but it is intended to

have a positive effect in encouraging the appearance of the site in the landscape by the removal of unsightly buildings and structures. The policy confines a scheme to within the main cluster of buildings so there ought not to be an adverse effect on any biodiversity or landscape value of the surrounding area. Nor are there any heritage assets, to which the site forms an important setting.

7.11 The support of Policy 4 at Abingworth Nursery for some changes to the mix of housing types in the consented planning application has a number of positive effects. The policy accepts that there may be more than the 146 consented homes provided, so is positive in terms of meeting local housing needs, but only if the key principles of the consented scheme continue to apply. These include the provision of new community facilities, hence the positive assessment in that respect, but also they confine the developable area to that consented to avoid any additional negative effects on the landscape and biodiversity value of the surrounding countryside.

7.12 Policy 5 encourages the retention of employment sites in the Parish, other than those addressed elsewhere in the Plan. However, it includes a number of conditions to this support to ensure that proposals will not harm the village or local landscape character. This leads to the policy having neutral effects against each measure.

7.13 The design policy (Policy 6) seeks to ensure that all future proposals deliver high quality buildings in the Parish. It makes no specific provision for design within the setting of heritage assets, as that is already national planning policy and is covered by Policy 7, but its provisions for the use of vernacular building materials should ensure that the overall character and identity of the Parish are sustained and this is a positive effect of the policy. It also requires schemes to blend successfully with the countryside and to minimise light pollution, thus having a positive effect on the value of the local landscape.

7.14 The support for proposals affecting heritage assets in Policy 7 is qualified on a number of grounds to ensure the historic character of the Parish is maintained and thus has a positive effect on sustaining the value of local heritage assets. In doing so, it also requires the rural character of the setting to the Conservation Area and historic farmsteads to be paid attention to, thus having a positive effect in maintaining the local landscape character.

7.15 Policy 8 and Policy 9 manage a range of development types in the countryside, including equestrian uses, the conversion of agricultural buildings and the sub division of plots. Both policies are intended to ensure that the essential rural character of the Parish is maintained. As such, they will have the positive effect of avoiding harm to the local landscape.

7.16 Policy 10 promotes the value of green infrastructure in the Parish and seeks to protect valued landscapes and features that are distinctive to the area. In encouraging the creation or restoration of ecological corridors the policy will have positive biodiversity effects, as well as positive landscape value effects.

7.17 The Local Green Space designations of Policy 11 should have a number of positive effects. The spaces have a combination of recreational and/or visual value so the policy will have positive effects in terms of sustaining open spaces as community

facilities, as well as retaining local biodiversity interest and sustaining the character of the villages.

7.18 Policy 12 defines a number of valued community buildings for retention and improvement to maintain their viability in future years. The policy therefore has a positive effect in terms of sustaining community facilities.

7.19 The encouragement of investment in new broadband and mobile communications infrastructure of Policy 13 is qualified by the requirement for any above-ground structures to be designed to reflect the character of the local area. This will ensure the policy has neutral effects in those aspects.

7.20 Policy 14 seeks to protect the highest grades of agricultural land from development. This should have the positive effect of maintaining biodiversity value of that land and in maintaining the rural landscape character as much of the Parish contains high quality soils.

7.21 In overall terms, therefore, the policies of the Plan should deliver a number of positive effects against the SA/SEA objectives. Importantly, no policy is assessed as having any negative effects on those objectives. Further, the scale and location of specific development policies (Policies 2, 3 and 4) is such that there should be no cumulative effects on the objectives and nor with the effects of policies contained within the adjoining neighbourhood plans.

Assessing the impact of any reasonable policy alternatives

7.22 In Table D, the assessment is of the reasonable policy alternatives. This enables the assessment to show the sustainability benefits of the chosen policies compared to those alternatives.

7.23 The only reasonable alternative to the spatial plan of Policy 1 was for the policy to allow for settlement boundary changes to accommodate extensions of Storrington/Sullington, Thakeham and West Chiltington villages into the surrounding countryside in proportion to their existing scale and position in the settlement hierarchy. A small number of sites were assessed as being either deliverable or developable in the Horsham District SHLAA of July 2014 in these locations adjoining settlement boundaries, so this alternative was technically reasonable to assess. Some other sites in the SHLAA lay well beyond a settlement boundary and, given such proposals would be contrary to national and local planning policy, they were not considered reasonable alternatives.

7.24 The assessment shows this option would have resulted in a greater number of new homes being provided for – perhaps as many as another 60-80 homes – and so is assessed as positive in housing supply terms. It is not possible to discern if such proposals would have any effects on the provision of community facilities nor on their effects on biodiversity, hence they are assessed as neutral in those respects. However, it is unlikely that further Greenfield encroachments by development into the countryside around the settlements could be achieved without consequences for the rural character of the Parish in those locations, and this alternative has therefore been assessed as negative in those respects.

7.25 In any event, it is arguable that this alternative is genuinely reasonable. Not only is the Parish already delivering a significant quantum of housing that would be regarded as disproportionate to its rural location (with the Abingworth and Water Lane consents), such an alternative would be highly unlikely to secure a majority vote at the referendum. Unless and until the HDPF or a subsequent Development Plan review change the strategic planning policy framework for the Parish then meeting housing need in this area must be tempered by recent events and local community opinion.

The table of alternative sites assessed as given in the Site Assessment Report is copied below. For further detail, see the separate Site Assessment Report.

Thakeham Neighbourhood Plan Site Assessment

| SITE NUMBER | SHLAA REF | Site | Estimated number of houses | Outside Current Built Up area Boundary | Next to built up area boundary | On Grade 2 & 3A agricultural land | Coalescence | Part of Local Green Space (L) | Impact on employment sites | Impact on conservation area | Impact on landscape | Liability to Flooding | Not accessible to reasonable quality public transport (F) | Affect on listed building and archaeological sites | SCORE |
|---------------------------------------|-----------|-------------------------------------|----------------------------|--|--------------------------------|-----------------------------------|-------------|-------------------------------|----------------------------|-----------------------------|---------------------|-----------------------|---|--|-------|
| TNP Call for sites responses | | | | | | | | | | | | | | | |
| 1 | SA 339 | Throats Lane | 8 | 1 | 0 | 0 | 1 | 1 | 0 | 0 | 1 | 0 | 1 | 0 | 5 |
| 2 | SA 019 | Knockfield Nursery | 23 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 5 |
| 3 | SA 384 | Oxcharney Farm (A) | 60 | 1 | 0 | 0 | 1 | 1 | 0 | 0 | 1 | 0 | 1 | 0 | 5 |
| 4 | | High Bar Lane adj to playground (B) | 30 | 1 | 0 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 4 |
| 5 | | Near Champains Cottages | 20 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 4 |
| 6 | | Woodlands Walk | 100 | 1 | 1 | 1 | 1 | 0 | 0 | 1 | 1 | 0 | 1 | 1 | 4 |
| 7 | | Wrest Cottage/Plum Tree Cottage | 5 | 1 | 1 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 4 |
| 8 | SA 335 | Townhouse Farm (C) | 11 | 1 | 1 | 1 | 1 | 0 | 1 | 0 | 0 | 0 | 1 | 0 | 6 |
| 9 | | Land at Cootham Rd | 5 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | 6 |
| | | Total | 313 | | | | | | | | | | | | |
| Very Small Development | | | | | | | | | | | | | | | |
| 10 | | White House - Storrington Road (C) | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 2 |
| 11 | | Entrance to Thakeham Place Farm | 2 | 1 | 0 | 1 | 1 | 0 | 0 | 1 | 1 | 0 | 1 | 1 | 7 |
| | | Total | 3 | | | | | | | | | | | | |
| Proposed TNP Allocated Site | | | | | | | | | | | | | | | |
| 12 | SA 012 | Thakeham Tiles (D) | 50 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| | | Total | 50 | | | | | | | | | | | | |
| SHLAA sites not included above | | | | | | | | | | | | | | | |
| 13 | SA 239 | Abingworth Hotel | | 1 | 1 | 1 | 1 | 0 | 1 | 0 | 0 | 0 | 1 | 0 | 4 |
| 14 | SA 027 | Roberts Corner | | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 1 | 4 |
| 15 | SA 021 | Lions Yard | | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 4 |
| 16 | SA 669 | Land off Storrington Road | 75 | 1 | 1 | 0 | 1 | 0 | 0 | 0 | 1 | 0 | 0 | 1 | 5 |

NOTES

- A SHLAA capacity for site 7 dwellings
- B Estimated dwellings - Developer did not quote number of dwellings
- C Largely previously developed land
- D Thakeham Tiles: 50 houses is the SHLAA estimate for all the land, the TNP policy is only for development on land covered by hardstanding.
- E Refer to TNP's Local Green Space Study Nov 2014
- F As defined by previous planning decisions in the locality

7.26 The reasonable alternative to all the other policies was for the Plan to remain silent in those respects. As noted in para 4.4 earlier, such alternatives would generally be unlikely to have any serious consequences given the adopted policies of the Core Strategy and Development Management DPDs will continue to inform decisions on planning applications. Almost all policy alternatives are therefore assessed as having a neutral effect.

7.27 However, with policies 2, 11 and 12, the lost opportunity of having a Plan policy to guide, encourage or discourage specific proposals may result in negative effects, though this should not be exaggerated. At Thakeham Tiles (Policy 2), the no policy option may result in the occupier being dissuaded to bring forward proposals to relocate, resulting in the loss of a housing site. With policies 11 and 12, the no policy option may make those listed facilities and spaces relatively more vulnerable if the Plan does not make it clear what facilities and spaces are deserving of greater protection by local and/or national policy.

| | ALTERNATIVE POLICY OPTIONS | Housing | Community Facilities | Biodiversity | Landscape | Heritage |
|----|---|----------------|---------------------------------|---------------------|------------------|-----------------|
| | SA/SEA Objective | 1 | 2 | 3 | 4 | 5 |
| | TPNP Policies | | | | | |
| 1 | Spatial Plan | | | | | |
| 2 | Thakeham Tiles | | | | | |
| 3 | Horticultural Land off Storrington Road | | | | | |
| 4 | Abingworth Nursery | | | | | |
| 5 | Employment Sites | | | | | |
| 6 | Design | | | | | |
| 7 | Heritage Assets | | | | | |
| 8 | Sub Division of Agricultural Land | | | | | |
| 9 | Development in the Countryside | | | | | |
| 10 | Green Infrastructure | | | | | |
| 11 | Local Green Spaces | | | | | |
| 12 | Community Facilities | | | | | |
| 13 | Broadband and Mobile Comms | | | | | |
| 14 | Soils | | | | | |

Table D: Summary Assessment of Policies' Alternative Options

7.28 In overall terms, therefore, the environmental impacts of the Neighbourhood Plan are generally assessed as neutral but often positive. The proposed mitigation measures of most policies will effectively avoid any negative impacts. Only in respect of the reasonable alternatives are there any negative potential impacts.

8. A description of measures envisaged concerning monitoring

8.1 The Parish Council will monitor the progress in the implementation of the Neighbourhood Plan using the measures identified in Table A. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data on an annual basis to report on the progress of the Plan. It is likely the Parish Council will choose to review the Neighbourhood Plan on a five year cycle and it will be informed by this monitoring activity in considering if and how to update the policies.