

## **Nuthurst Neighbourhood Development Plan**

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

The Nuthurst Neighbourhood Development Plan was 'made' on the 21<sup>st</sup> October 2015 and now forms part of the Development Plan for the determination of planning applications in the Nuthurst 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 April 2014 Nuthurst Parish Council prepared a State of the Parish report to support the development of the emerging Neighbourhood Development Plan (NDP). This document summarised the baseline data for the area in order to establish the context in which the NDP would be prepared. This document was drawn upon and added to when preparing the SA/SEA Scoping Report where particular elements relating to sustainability and the environment were presented in more detail and included in Appendix B of the report.

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

Figure 1: SA Framework

Topic	Objective
<b>Housing</b>	To provide high quality, affordable housing with a range of size, types and tenures appropriate to local needs
<b>Education, Leisure &amp; Recreation</b>	To ensure everyone has access to appropriate, affordable community facilities
<b>Biodiversity</b>	To protect and enhance the quality and level of biodiversity and natural habitats within the parish and provide new green infrastructure.
<b>Landscape</b>	To conserve and enhance the quality of landscape and townscape character in the District
<b>Cultural Heritage</b>	To conserve and enhance the quality and distinctiveness of the historical and cultural environment of the parish:
<b>Transport</b>	To reduce the need to travel and improve travel choices through the provision of a range of sustainable transport options, including walking, cycling and public transport
<b>Economic Development</b>	To encourage vitality, vibrancy and overall stability within the local economy, including in rural areas

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 Site Assessment Report, September 2014, includes the following

- Is the site in or adjoining the existing built up area boundary (Mannings Heath) or existing observed settlement boundary (other settlements)?
- Is it in the High Weald Area of Outstanding Natural Beauty?
- Is it in a location that would be particularly detrimental to the existing landscape?

These criteria principally resulted in a number of sites not being included in the Neighbourhood Plan e.g. Field at junction of Broadwater and Polecat Lanes, Copsale (isolated rural green field), and Field at Saddler's Farm, Mannings Heath (green field site in AONB).

The General Survey and Housing Needs Survey identified residents' wishes that helped to shape the policies. Residents were equally divided between wanting 75 houses over the 15 year Plan period (the same rate of development as in the previous 30 years) or less than 75 houses in the 15 year plan period. The Plan provides for 50 to 60 houses. Residents did not want any large developments. They wanted small developments spread across the Parish and the wanted some smaller houses for younger people and older people to downsize and some "affordable homes". This is what the policies in the Plan deliver.

The SA/SEA process involved identifying and analysing all the plans, programmes and policies which could impact the Nuthurst Neighbourhood Plan. Specifically these included the Horsham District Council Core Strategy (2007), General Development Control Policies (2007), and 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.

## **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 Nuthurst Neighbourhood Development Plan 2015-2031 was an iterative process, carried out concurrently with the development of the Nuthurst Neighbourhood Development Plan.

The SA process contributed to the development of the Nuthurst 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 Nuthurst Neighbourhood Plan. The outcome of this assessment is documented within paragraphs 7.5 to 7.20 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 policies 12 to 15 included changes to the policy wording to prevent negative impacts on the landscape, cultural heritage and traffic.

No amendments to site allocations as a result of the SA/SEA. However, the Independent examiner recommended the removal of one site (Keatings) because he considered that it would not represent sustainable development and HDC/NPC accepted this recommendation.

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 State of the Parish Report and SA Scoping Report (2014). The SA/SEA Report was prepared alongside the Nuthurst Neighbourhood Plan by Nuthurst Parish Council. It was reflected within and supported the draft Nuthurst 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. The consultation undertaken with members of the public and statutory consultees;**
  - b. The action taken (if any) by the Parish Council in response to comments made on the documents which were made publically available in its principal office;**
  
- 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 August 2014 and responses were received from Horsham District Council and Natural England. Each made some minor comments that were taken into account.

#### **Public Consultation**

The SA/SEA of the Nuthurst Neighbourhood Plan was consulted upon along the Nuthurst Neighbourhood Plan for six weeks at the Neighbourhood Plan Regulation 14 stage and then for a further six weeks alongside the Neighbourhood Plan Regulation 16 Publicity Period.

A summary of all bodies consulted on the Nuthurst Neighbourhood Development Plan and SA/SEA Report is included in the Nuthurst Parish Neighbourhood Plan Consultation Statement, 2015.

#### **Neighbouring Authorities**

Horsham District Council was consulted on the initial scope of the SA/SEA and the Regulation 14 and 16 Consultations. On the basis of a recommendation from HDC, an additional Objective on flood risk was added to the SA Framework in the Scoping Report. Comments were also provided on the Baseline information in Appendix B and these changes were incorporated into the final SA Report.

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, once which allowed only infill and

windfall development within the built up area boundaries (BUAB) and a second which allowed for development beyond (not adjoining) the BUAB (therefore less constrained than the proposed policy). The assessment concluded that overall sustainability performance rates were better for the proposed policies which allocated land within and adjoining the BUAB's, therefore this option was carried forward to adoption.

The Nuthurst Neighbourhood Plan has been 'made' on the recommendations of a suitably qualified Independent Examiner. No new evidence has been brought to the attention of Horsham District Council since the Examination took place to bring into question those recommendations. 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 consultation 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 a further 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 Nuthurst Neighbourhood Plan has on the environment will need to be monitored using the Sustainability Objectives identified in the Nuthurst 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 Nuthurst 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;*

[https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0007/9295/CD\\_LP\\_25-HDPF-Monitoring-Framework.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0007/9295/CD_LP_25-HDPF-Monitoring-Framework.pdf)