



## **Thakeham Parish Neighbourhood Development Plan**

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

The Thakeham Neighbourhood Development Plan was 'made' on the 26 April 2017 and now forms part of the Development Plan for the determination of planning applications in the Thakeham 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 August 2014 Thakeham 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.

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

Figure 1: SA Framework

Topic	SEA Assessment criteria
<b>Housing</b>	To consider how the availability of decent affordable housing, provide a range of housing types of various sizes and tenures, make better use of brownfield land is achieved
<b>Education, Leisure &amp; Recreation</b>	To sustain or increase the provision of community facilities
<b>Biodiversity</b>	To consider the loss to biodiversity flora and fauna as a result of development, either directly or through habitat fragmentation.
<b>Landscape</b>	To consider whether the plan will result in a deterioration of the quality of the landscape or village scape
<b>Heritage</b>	To consider how the plan protected and enhances designated features of historical or cultural interest and how the settings and views of heritage assets are sustained.

Using sustainability objectives which reflected the current environmental issues ensured that the most sustainable options were taken forward. One key sustainability issue for the Parish is the level of development which has already been permitted in the parish, and the boundary of the Parish with Storrington in the South. This was a key factor when considering the level of development that was proposed, together with the location of the housing allocations in the plan.

The SA/SEA process involved identifying and analysing all the plans, programmes and policies which could impact the Thakeham 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.

## **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 Thakeham Parish Neighbourhood Plan to 2031 was an iterative process, carried out concurrently with the development of the Neighbourhood Development Plan.

The SA process contributed to the development of the Thakeham Parish Neighbourhood Plan by providing an assessment of all reasonable policy and potential site options. In this assessment, the SA Framework was used 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 Thakeham Neighbourhood Plan. The outcome of this assessment is documented within paragraphs 7.5 to 7.28 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 Policy 3 confined any scheme to within the main cluster of buildings to prevent an adverse effect on biodiversity or landscape value to the surrounding area.

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 Thakeham Parish Neighbourhood Plan by Thakeham Parish Council. It was reflected within and supported the draft Thakeham Parish 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 October –November 2014. The comments on the scope of the SA and sustainability objectives were supportive

### **Public Consultation**

The SA/SEA of the Thakeham Neighbourhood Plan was consulted upon 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 Thakeham Neighbourhood Development Plan and SA/SEA Report is included in the Thakeham 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, additional information was added

to the SA documentation in relation to the consideration of alternative sites in particular. 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. Comments were also made by Storrington, Sullington and Washington Neighbourhood Plan steering group which were addressed in the regulation 14 report dated March 2015.

**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, which included an assessment of a number of alternative sites. Given that the plan was written to be in general conformity with the HDPF, some policy options were more limited – the main option tested was the ‘do nothing’. This would however not have identified land for housing to meet the housing needs for the Parish in the future and would not have been a sustainable outcome in this respect

The Thakeham Parish 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 Thakeham Parish Neighbourhood Plan has on the environment will need to be monitored. 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 Thakeham Parish 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)