



Pulborough Parish Neighbourhood Plan 2014-2031: Pre-Submission Plan

Strategic Environmental Assessment (SEA): Non-Technical Summary – April 2020







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Glossary of Acronyms

AA	Appropriate Assessment
ALC	Agricultural Land Classification
AQMA	Air Quality Management Area
DCLG	Department for Communities and Local Government
DPD	Development Plan Document
EA	Environment Agency
EC	European Commission
EU	European Union
Ha	Hectare
HE	Historic England
HDC	Horsham District Council
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
KSI	Killed or Seriously Injured (statistics)
LB	Listed Building
LCA	Landscape Character Assessment
LPA	Local Planning Authority
MSA	Minerals Safeguarding Area
NE	Natural England
NHS	National Health Service
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PDL	Previously Developed Land
PRoW	Public Right of Way
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SHELAA	Strategic Housing & Employment Land Availability Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SSSI	Site of Specific Scientific Interest
SuDS	Sustainable Drainage System
UK	United Kingdom
WPA	Waste Planning Authority

1. Introduction

1.1 Background

On behalf of Pulborough Parish Council, Horsham District Council (HDC) as the relevant Local Planning Authority (LPA) commissioned Place Services to undertake an independent Strategic Environmental Assessment (SEA) for the Pulborough Parish Council Neighbourhood Plan.

This Report is the SEA Environmental Report for the Pre-Submission Neighbourhood Plan and follows work undertaken by Place Services on a SEA Scoping Report in August 2019.

1.2 The Pulborough Parish Council Neighbourhood Plan

1.2.1 Background and work done to date

The Pulborough Parish Council Neighbourhood Plan (referred to hereafter as the Neighbourhood Plan or simply 'the Plan') is being prepared by the Parish Council in accordance with and under the provisions of the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

Pulborough is located within the Horsham District of West Sussex and is identified as a 'small town / larger village' within the emerging Horsham District Local Plan and as a result can be expected to accommodate some growth in accordance with the LPA meeting their objectively assessed needs for housing. The Local Plan also identifies Pulborough as a 'secondary retail centre.' The Neighbourhood Plan as a result is looking to allocate sites for development purposes and also produce locally relevant policies applicable to the Plan area to ensure sustainable development.

A Neighbourhood Plan was prepared in 2015 and was submitted for consultation both at parish level (Regulation 14) and at district authority level (Regulation 16). As a result of comments made and interviews taking place at district authority level, it was decided by the district authority that the Plan should be returned to the parish for the Neighbourhood Plan Steering Group to re-appraise the site assessment process prior to proceeding through Regulation 14 stage once again.

2. Strategic Environmental Assessment (SEA)

2.1 The Requirement for SEA

The requirement for Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs'

This definition is consistent with the themes of the National Planning Policy Framework (NPPF), which draws upon The UK Sustainable Development Strategy Securing the Future's five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

SEA originates from the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the 'SEA Directive') which came into force in 2001. It seeks to increase the level of protection for the environment; integrate environmental considerations into the preparation and adoption of plans and programmes; and promote sustainable development. The Directive was transposed into English legislation in 2004 by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulation') which requires an SEA to be carried out for plans or programmes,

'subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions'.

This includes some Neighbourhood Plans. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as: *'biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'* as specified in Annex 1(f) of the Directive.

2.2 The Aim and Structure of this Report

The aim of this Report is to:

- Test the Plan objectives against the SEA Objectives;
- Predict the effects of the draft Plan, including alternatives;
- Evaluate the effects of the draft Plan, including alternatives;
- Consider ways to mitigate adverse effects; and
- Propose measures to monitor the environmental effects of Plan implementation.



3. Outline of the Neighbourhood Plan and relationship with other plans

3.1 An outline of the Neighbourhood Plan

The purpose of the Pulborough Parish Neighbourhood Plan (PPNP) will be to make planning policies that can be used to determine planning applications in the area. In some cases, its policies will encourage development proposals for the benefit of the local community. In others, its policies will aim to protect the special character of the parish.

Neighbourhood Plans should set out a positive vision for the future of the area, reflecting the aspirations of the local community, and include agreed priorities to ensure sustainable development. The Vision and Objectives for the Plan are as follows:

Vision

'The vision for Pulborough Parish is to be a balanced living and working community at the heart of rural West Sussex that maximises its location, links and assets to deliver the highest possible quality of life to all its residents whilst supporting a varied, thriving local economy and maintaining the village's role as an important service centre.'

Objectives

- | | |
|--------------------|--|
| Environment | <ul style="list-style-type: none"> - To conserve the landscape, scenic beauty and views of the South Downs National Park and other surrounding countryside - To conserve the rural character and qualities of the other landscapes of the parish and of the identity of the village - To avoid any significant impacts on the Arun Valley Special Area of Conservation or on any other biodiversity assets in the parish - To sustain and enhance the character of Listed Buildings and the Conservation Areas |
| Community | <ul style="list-style-type: none"> - To protect and provide additional community facilities to support all age groups and a wider range of parish needs - To improve the connectivity within the village so that people can get about safely and pleasantly on foot or by bike/mobility scooter, or by public transport - To create the feeling of a unified community - To increase the capacity of local primary and secondary school places |



	- To better manage the effects of car parking and traffic in the village - To improve the feeling of safety and wellbeing in the community and to reduce the fear of crime
	- To retain as far as possible the public houses that remain within the parish - To resist any proposals that will result in the loss of any community facility as designated under Policy 13 unless that loss can be fully justified in the respect that the community benefit is no longer relevant or necessary - To resist any development of any community facility unless that facility is provided in a satisfactory location in advance of any loss
New Homes	- To reuse brownfield sites and where possible to renovate disused agricultural buildings - To meet the needs of local people by building types of homes that have not been a major part of schemes of the last few years - smaller homes for starter homes for younger people and families and downsizing homes for older residents. - To enable older households to downsize to free up mid-size homes occupied by older couples or individuals - To focus small developments in the village, with any larger, high value detached homes (where owners are likely to operate one or more cars) being more suitable to the more rural areas
Employment	- To encourage economic development at existing economic areas - To encourage retail development along Lower Street as the community's preferred retail heart whilst also supporting the other established commercial areas - To encourage a diversity of business and the creation of a stronger visitor economy - To support home-based business to move to first premises through provision of a local business centre in the village - To protect the agriculture and horticultural land from unnecessary loss

3.2 Relationship with other Policies, Plans and Programmes

A Neighbourhood Plan attains the same legal status as a Local Plan once it has been approved at a referendum and can be developed before or at the same time as the Local Planning Authority is producing its Local Plan. Once 'made' or adopted, at this point it comes into force as part of the statutory development plan for the area, in this case Horsham District Council. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise

A draft Neighbourhood Plan must be in general conformity with the strategic policies of the development plan



in force if it is to meet the basic condition. Additionally, Neighbourhood Plans must have regard to existing policies, plans and programmes at national and regional levels and strengthen and support other plans and strategies. It is therefore important to identify and review those policies, plans and programmes which are likely to influence the Neighbourhood Plan at an early stage.

The content of these plans and programmes can also assist in the identification of any conflicting content of plans and programmes in accumulation with the Neighbourhood Plan. A list and description of relevant plans and programmes is included with the SEA Environmental Report.

4. The Current State of the Environment

4.1 Baseline information

Baseline information identifies current sustainability issues and problems in the Plan area which should be addressed and provides a basis for predicting and monitoring the effects of implementing the Plan as required by this SEA. Appendix I of the main SEA Environmental Report his Report outlines the full baseline information profile for the Plan area, and where relevant, Horsham District.

The following table outlines the key baseline information and thought process which has led to the formulation of the SEA Objectives for the Plan, which are outlined in Section 4.2.

Table 1: Key Sustainability Issues and Problems

General Theme	Focused Theme	Description / Supporting Evidence
Population and society	Ageing population	Pulborough has a population number of 5,205 as taken from the 2011 census. The average age of the population is older than the national and county averages with higher percentages in the 45-64 age bracket (at 29.9% of the local population) and the 65+ age bracket (23.1% of the local population).
Health & Wellbeing	Healthcare infrastructure	Access to healthcare is limited in the District, with a lack of a major hospital close by alongside the rural nature of the District. Horsham is projected to have a rise in people aged over 75, and therefore demand across the different care types is estimated to rise by 88%.
	Suitable homes for an ageing population	People aged 65+ have the highest risk of falling, and approximately 59,027 may be expected to fall each year in West Sussex according to the College of Occupational Therapists. Falls are the largest cause of emergency hospital admissions for older people, with 4,199 admissions in 2014/15 for injuries caused by falls for people aged 65+ in West Sussex
Housing	Housing type	The percentage of semi-detached / terraced homes in Pulborough (at 39.58%) is lower than that of the District (at 45%).
	Housing type / Affordability	The 'Housing Needs Survey Report' for Pulborough (2011) indicates that at the time of writing, a total of 71 (91% of survey respondents) households had an income below £24,999 per annum which is the lowest level income that would be considered for shared ownership housing or for rent. Many Pulborough residents therefore may still not meet the requirements/ cannot afford to buy a home within the survey study area.

General Theme	Focused Theme	Description / Supporting Evidence
Economy & Employment	Location of commercial premises	Commercial premises in Pulborough are dispersed, with no traditional 'centre' for retail and social activities. The emerging Horsham Local Plan identifies Pulborough as a 'secondary retail centre'.
Biodiversity & Nature Conservation	Protected Species	As identified by the South Downs National Park Authority in a consultation response to the previous Pulborough Neighbourhood Plan Regulation 16 consultation, construction of new development could have the potential to "result in likely significant effects upon the barbastelle bats of the Mens SAC via direct habitat loss or disturbances from lighting, noise and vibrations both during construction and operational phases of development".
	Proximity of Habitats Sites	The Arun Valley Special Protect Area (SPA)/Ramsar (Habitats Site) is adjacent to the Plan area and consists of three component Sites of Special Scientific Interest (SSSI), Pulborough Brooks SSSIs, Amberley Wild Brooks SSSIs and Waltham Brook SSSI. The Plan area is also within 7km of the Mens Special Area of Conservation (SAC) (also a Habitats Site).
	Wildlife designations	In Pulborough, there are six Local Nature Reserves and two SSSIs.
	Priority Habitats	Pulborough Parish contains approximately 20 areas identified by Natural England as Priority Habitats which are subject to Habitat Action Plans.
Historic Environment	Archaeological deposits	Pulborough is an area well known for its Roman archaeology.
	Heritage assets	There are two Grade I Listed Buildings in the Parish: Stopham Bridge and The Parish Church of St. Mary, and 124 Grade II listed buildings. The historic narrow streets of Pulborough are an issue for accommodating development and relieving traffic; the widening of roads presents a challenge.
	Conservation Areas	There are three Conservation Areas within the Neighbourhood Plan area: the 'Pulborough Lower Street Conservation Area'; the 'Pulborough Church Place Conservation Area'; and the 'Nutbourne Conservation Area.'
Landscape	Landscape Character	The Horsham District Landscape Character Assessment identifies sensitivities to the landscape character as: • Large scale housing developments • Large scale commercial / industrial development • Minor road improvements • Decline in traditional land management.

General Theme	Focused Theme	Description / Supporting Evidence
	Location of the South Downs National Park	Parts of the Plan area to the west and south are within the South Downs National Park. The South Downs National Park Authority (SDNPA) Local Plan outlines planning policies and protection objectives that will need to be factored into the Neighbourhood Plan.
		Previous iterations of the Neighbourhood Plan (in 2015) received consultation comments by the SDNPA that expressed concerns surrounding external lighting, the prevention of encroachment and urbanising infrastructure.
	Landscape Sensitivity	A Landscape Capacity Assessment (2014) identifies Pulborough (and the wider Plan area) as having no to low capacity to accommodate large scale housing and employment development in most areas bordering the built up area, with the exception of an area to the north east of the built up area of Pulborough. This area (with low to moderate capacity) is located to the east of Drovers Lane and Glebelands and extends further eastward to Broomers Hill Lane.
Water Environment	Groundwater	Much of the groundwater under the southern region of the District (such as Storrington, Steyning and Pulborough) forms a major aquifer. The Plan area is entirely within Groundwater Source Protection Zone 3 (Total Catchment). Such zones surround an abstraction point for public water supply and are therefore important to protect from any potential sources of contamination.
	Water Quality	There is concern that future development may reduce river flows, meaning less water is available to dilute sewerage, thereby impacting water quality. The River Arun has low summer flows and so, any deterioration in water quality could affect the Arun Valley SPA
	Flood risk	The frequency and duration of winter flooding at Pulborough Brooks has increased significantly in the last twenty years while 2012 recorded the first extended summer flooding. The causes of increased flooding are believed to include the effects of climate change and land-use changes in the catchment such as building on flood plains and faster run-off from hard surfaces associated with development.
Transport & Connectivity	A-Road Capacity	The A29 Stane Street is a well-used primary route between London and the South Coast and whilst it has improved over the years, it still is a single carriageway road for most of its length. The A29 passes through Pulborough and there are a number of constraints where the road is below modern standards for route carrying such a heavy volume of traffic. These constraints are particularly noticeable at Swan Corner (where the A29 and A283 meet), Church Hill and Sopers Hill.

General Theme	Focused Theme	Description / Supporting Evidence
	Lower Category Road Capacity	The roads throughout Pulborough are very narrow, making it difficult to accommodate vehicles. All traffic counts suggest that two recent supermarkets in London Road are major attractors of traffic, especially from the north and east of the village as well as within the village itself
	Road Safety	The number of road casualties in Horsham District has increased from 277 in 2012/13 to 322 in 2013/14.
	Pedestrian and Cycling Infrastructure	The A29 and A283 routes in Pulborough are particularly difficult for cyclists to use due to the volume of traffic and uneven surfaces. The existing pedestrian links in Pulborough are far from satisfactory, particularly in the historical areas of the village that generate the most pedestrian movement.
Air Quality & Noise	Carbon Emissions	Horsham District had the highest tonnage of carbon dioxide emitted compared with all the district/borough Councils in West Sussex (a total of 968kt CO ₂). Carbon emissions for Horsham District were spread across three sectors with 34% coming from industry and commerce, 34% coming from Domestic and 32% resultant from Transport. In Horsham, 77% of air pollution is produced by motor vehicles
	Road and Rail Noise Levels	Noise maps indicate that there are noise pollution issues within Pulborough associated with the A29 London Road. Average road traffic noise levels of 70.0 - 74.9 decibels can be experienced along this stretch of road, with noise dissipating outwards from the road itself. There are similar issues surrounding the railway line, with average rail traffic noise levels of generally up to 60.0 - 64.9 decibels in the day, with small pockets of the line within the Plan area that experience levels of 65.0 – 69.9 decibels.
Minerals & Waste	Minerals Safeguarding	As identified within the West Sussex Joint Minerals Local Plan, 2018 (adopted by West Sussex County Council and the South Downs National Park Authority) Pulborough is located within the following Minerals Safeguarding Areas MSAs: • Soft Sand (including potential Silica Sand) Mineral Safeguarding Area (including 250m buffer) • Brick Clay (weald Clay Formation) Resource Mineral Safeguarding Area (including 250m buffer) • Building Stone Mineral Safeguarding Area (including 250m buffer)

4.2 The Formation of Relevant SEA Objectives & the SEA Framework

SEA Objectives respond to the key issues identified in Section 4.1 and ask important questions regarding the sustainability of the Plan they are assessing.

The following table sets out the SEA Objectives and key questions devised for the assessment of the Neighbourhood Plan. It also includes monitoring indicators which can be used to assess the effectiveness of the Plan's content over time.

Table 2: SEA Framework for Assessing the Plan

SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
1. To improve the health of the population overall and reduce health inequalities	- Does it address the requirements of an ageing population? - Will it improve access to health facilities and social care services? - Will it encourage healthy lifestyles? - Will it support special needs and an ageing population? - Will it increase access to open countryside? - Will it increase access to public open space? - Will it improve access to community facilities? - Will it reduce noise and odour concerns? - Does the proposal retain and enhance existing open and natural spaces? - Does it seek to and consider the remediation of contaminated land?	- Life Expectancy - Indices of Multiple Deprivation – sub-domain scores - Residents opinion on availability of open space/leisure facilities - Natural England Accessible Natural Greenspace Standards (ANGSt) - Location and extent of recreational facilities to development sites - Location and extent of accessible greenspace to development sites - Proximity of site to healthcare facilities - Percentage of population obese - Percentage of sites coming forward on contaminated land
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	- Does it seek to ensure sufficient infrastructure to support new development? - Will it improve access to primary / secondary schools? - Will it reduce poverty and social exclusion in those areas most affected? - Will it maintain and improve access to key services and facilities for all sectors of the	- Access to open space - Natural England Accessible Natural Greenspace Standards - Residents opinion on availability of open space/leisure facilities - Indices of Multiple Deprivation – sub-domain scores (barriers to services) - S106 agreement contributions - Trends in primary school capacities

SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
	population? /Does the proposal retain or re-provide existing social infrastructure?	Number of GPs and dentists accepting new patients
3. To meet the housing requirements of the whole community	- Does the proposal include Lifetime Homes? - Will it meet the housing requirements of the whole community? - Will it reduce homelessness? - Will it contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing? - Will it reduce the number of unfit homes? - Does the proposal include homes that can be adapted to support independent living for older and disabled people? - Does the proposal address the housing needs of older people, through specific design requirements?	- Trends in House Prices - Affordable units completed, including rural exception sites - Dwelling stock below the 'Decent Home Standard' - Indices of Multiple Deprivation Score – particularly Housing and Services Domain and the Living Environment Deprivation Domain - Annual dwelling completions - Population projections and forecasts
4. To ensure no deterioration of water quality	- Will it protect and enhance water resources? - Will it support the achievement of Water Framework Directive targets? - Will it protect and improve the quality of inland waters? - Will it promote the sustainable use of water? - Will it maintain water availability or water dependent habitats? - Will it support the provision of sufficient water supply and treatment infrastructure? - Does the proposal incorporate sustainable design and construction techniques? - Will it protect and enhance protected sites under the habitats directive?	- Water quality (and trends) in river basin district (river quality data). - Compliance with emission limits in identified locations. - Compliance with environmental quality standards in identified locations. - Percentage of water bodies at good ecological status or potential - Percentage of water bodies assessed at good or high biological status - Percentage of water bodies assessed at good chemical status
5. To maintain and where possible improve air and noise quality	- Will it protect and improve air quality? - Does the proposal minimise noise pollution caused by traffic, rail and commercial uses?	- Trends in ambient noise levels - NO2 emissions

SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
	Does the proposal incorporate sustainable design and construction techniques to combat nearby sources of noise?	Conditions regarding noise and air mitigation in granted planning applications
6. To reduce emissions of greenhouse gases from energy consumption	- Will it reduce emissions of greenhouse gases/head of population by reducing energy consumption? - Will it increase the proportion of energy needs being met by renewable sources? - Does the proposal incorporate renewable energy? - Does the proposal contain homes that are highly energy efficient? - Does it seek to integrate climate change mitigation and adaptation measures into the historic environment sensitively?	- Carbon Dioxide emissions - Energy consumption GWh/households - Trends in recorded PM10 emissions - Percentage of energy supplied from renewable sources.
7. To reduce vulnerability and increase resilience to extreme weather events and flooding	- Will it not lead to a deterioration of water availability? - Will it minimise the risk of flooding to people and property from rivers and watercourses? - Will it reduce the risk of damage to people and property from extreme weather events? - Does the proposal incorporate sustainable design and construction techniques? - Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping? - Does the proposal incorporate sustainable urban drainage techniques?	- Residential properties flooded from main rivers - Planning permission in identified flood zones granted permission contrary to advice from the Environment Agency - Incidences of flooding and location - Incidences of flood warnings in Plan area - Number of applications where there was a failure to pass the sequential test, even though sites at lower risk of flooding were available, but other planning reasons were given for granting planning permission.
8. To conserve and enhance biodiversity and geodiversity	- Will it conserve and enhance natural/semi natural habitats? - Will it maintain and enhance Habitats Sites (SPAs, SACs, Ramsar sites)? - Will it maintain and enhance nationally designated nature conservation sites?	- Spatial extent and condition of designated sites within and adjacent to the Plan area - Achievement of Biodiversity Action Plan targets

SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
	• Will it maintain and enhance locally designated nature conservation sites? • Will it avoid disturbance or damage to protected species and their habitats? • Will it help deliver the targets and actions for habitats and species within Biodiversity Action Plans? • Will it protect and enhance sites, features and areas of geological value in both urban and rural areas? • Will it lead to the creation of new habitat? • Does the proposal maintain or enhance biodiversity?	• Number of applications granted with accompanying ecological assessment / project-level HRA • Ecological potential assessments • Condition of the nearest sensitive receptors (where viable) • Site visit surveys on typical abundance and frequency of habitats (DAFOR scale)
9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance	• Will it protect and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their settings)? • Does it seek to ensure the protection and enhancement of the Conservation Areas? • Will it protect sites, features and areas of archaeological value in both urban and rural areas? • Does it seek to eradicate the loss, or erosion, of the historic character of the landscape / townscape? • Respect, maintain and strengthen local character and distinctiveness? • Will it contribute to the better management of heritage assets and tackle heritage at risk? • Does it seek to provide for increased access to and enjoyment of the historic environment? • Does it seek to promote heritage-led regeneration / help to reduce the number of vacant buildings through adaptive re-use?	• Impact on the 'at risk' status of assets. • Loss of, or damage to, any heritage asset and/or its setting • Trends regarding the 'Buildings At Risk Register' • Percentage of conservation area demolished or otherwise lost. • Amount of derelict properties and/or vacant land • Number of heritage assets being positively removed from the heritage at risk register • Amount of damage to listed buildings or scheduled monuments • Management of designated and undesignated historic environment assets • Numbers of undesignated historic environment assets lost through the planning process.

SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
10. To conserve and enhance the quality and local distinctiveness of landscapes including the South Downs National Park	- Does it seek to ensure that the protection objectives of the South Downs National Park Local Plan are upheld? - Will it reduce the amount of derelict, degraded and underused land? - Will it protect and enhance the settlement and its setting within the landscape? - Will it protect and enhance landscape character? - Will it minimise the loss of open countryside to development? - Will it minimise loss of the best and most versatile agricultural land to development? - Does the proposal make best use of existing land? - Will it maintain and enhance soil quality?	- Developments permitted contrary to Landscape Character Assessment 'sensitivities to change'. - Number and extent of field boundaries affected. - Proportional loss of Grade 2 agricultural land. - Proportion of development directed to Grade 3 agricultural land. - Proportion of development on brownfield land.
11. To achieve sustainable levels of prosperity and economic growth and improve the village's retail function	- Will it improve business development and enhance competitiveness? - Will it promote growth in key sectors? - Will it encourage rural diversification? - Will it encourage inward investment? - Will it make land available for business or commercial development? - Is there a range of retail uses, including food stores and smaller shops for social enterprises? - Does the proposal include managed and affordable workspace for local businesses? - Will it conserve identified mineral resources (as an economic resource)? - Will it increase the range of employment opportunities, shops and services available? - Will it decrease the number of vacant units? - Does it seek to ensure the concentration of services within an accessible location? - Will it enhance the viability and vitality of the village's retail function?	- Employment land availability - Percentage change and comparison in the total number of VAT registered businesses in the area - Businesses by industry type - Amount of vacant industrial floorspace - Travel to work flows - Employment status by residents and job type - Economic activity of residents - Proportion of business in rural locations - Amount of retail, leisure and office floorspace in centres. - Implemented and outstanding planning permissions for retail, office and commercial use



SEA Objectives	Proposed guide questions to meet objective	Potential indicators for monitoring effects
12. To promote sustainable transport, walking any cycling uptake and encourage efficient patterns of movement	• Will it reduce out-commuting? • Will it lead to a general reduction in transport emissions? • Will it lead to the inclusion of electric vehicle charging points? • Will it ensure development is located in close proximity to jobs, services and facilities? • Will it improve accessibility by public transport, walking and cycling? • Would it promote the use of sustainable travel modes and reduce dependence on the private car?	• NO2 emissions • Recorded traffic flows • Percentage of new developments with electric vehicle charging points • Access to services and business' by public transport • Indices of Multiple Deprivation • Travel to work methods and flows • Car ownership • Killed or Seriously Injured (KSI) casualties for adults and children • Network performance on roads • Public transport punctuality and efficiency

4.3 A Separate SEA Framework for Assessing Site Options

In addition to formulating a SEA Framework, used for assessing the Plan's policies, it is also important to put together a framework for assessing sites. Such an assessment is used where a Plan proposes to allocate land for future development to meet the Plan's aims.

It is important that a separate SEA Framework is devised for assessing sites, as many alternative sites are often submitted for consideration. The SEA Framework also ensures that that constraints 'on-the-ground' can be considered fairly, without the influence of other policies in the Plan. The SEA Framework for sites ensures that all sites, both those that are preferred and non-preferred, can be compared in a like-for-like manner using all available information.

The following table sets out the SEA Framework for sites.



Table 3: SEA Framework for Assessing the Plan's Site Options

SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (--)	Uncertain / Unknown (?)	Neutral impact (0)
1. To improve the health of the population overall and reduce health inequalities	(1.1) Will the site see a loss of land classified as 'open space'?	SHELAA	Proposal includes a variety of open space	Proposal includes additional open space	Loss of open space, some compensation	Loss of open space, no compensation	Where applicable	No net loss of open space
	(1.2) Might the site be located on contaminated land?	Mapping and previous land use	N/A	Proposal is not located on land that has a previous use associated with potential contamination	N/A	N/A	Proposal is located on land that has a previous use associated with potential contamination	N/A
2. To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure	(2.1) Accessibility to local education facilities	GIS mapping / SHELAA	N/A	Primary/Secondary school within 800m/10 minutes walking distance	No educational facilities within 800m/10 minutes walking distance	N/A	Where applicable	Where applicable
	(2.2) Accessibility to local healthcare services	GIS mapping / SHELAA	N/A	Healthcare service within 800m/10 minutes walking distance	No healthcare services within 800m/10 minutes walking distance	N/A	Where applicable	Where applicable



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (- -)	Uncertain / Unknown (?)	Neutral impact (0)
	(2.3) Accessibility to both retail and service provision for day to day needs	GIS mapping / SHELAA	N/A	Retail or service provision within 800m/10 minutes walking distance	No retail or service provision within 800m/10 minutes walking distance	N/A	Where applicable	Where applicable
	(2.4) Accessibility to local employment opportunities	GIS mapping / SHELAA	N/A	Local employment opportunity within 800m/10 minutes walking distance	No local employment opportunities within 800m/10 minutes walking distance	N/A	Where applicable	Where applicable
	(2.5) Fibre broadband availability	www.openreach.com	Fibre or wireless broadband available	Fibre broadband planned or underway to be completed by September 2019	Not in plans for an upgrade to superfast broadband / No broadband coverage	N/A	Where applicable	Where applicable
	(2.6) Distance to main employment areas	GIS / Aerial Mapping	Within 500m of existing employment area	Less than or equal to 500-1,000m from existing employment area	Between 1,500+ from existing employment area	N/A	Between 1,000-1,500m from existing employment area	Where applicable



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (- -)	Uncertain / Unknown (?)	Neutral impact (0)
3. To meet the housing requirements of the whole community	A consistent level of information is required for all housing allocations and alternatives, which can not be expected or can be relied upon at the strategic 'Plan' level. As such, SEA Objective 3 is considered a 'policy issue' and will not be assessed in the site assessment.							
4. To ensure no deterioration of water quality	(4.1) Proximity of any water bodies	GIS mapping	Over 200m	Over 100m	Within 50m / adjacent	N/A	Within 100m	N/A
	(4.2) Is the site within a ground water source protection zone?	GIS mapping	N/A	Not in GPZ	Within outer zone (Zone 2, Zone 2c)	Within inner zone (Zone 1, Zone 1c)	Within total catchment (Zone 3)/ where applicable	Where applicable
5. To maintain and where possible improve air and noise quality	(5.1) Would the site experience noise / is it in close proximity to road traffic or the railway?	GIS SHELAA layer / Extrium maps	Where applicable	No noise sources identified on site	Site would experience road / rail noise at 65-69.9 decibels in the day	Site would experience road / rail noise at 70 decibels or more in the day	Site would experience road / rail noise at 55-64.9 decibels in the day	Where applicable
	(5.2) Is the site within proximity to mineral extraction or waste	West Sussex Joint Minerals Local Plan (2018)	Where applicable	Site is beyond 250m of either an existing or proposed site for	Site is within 250m of either an existing or proposed site for	N/A	Where applicable	Where applicable



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (- -)	Uncertain / Unknown (?)	Neutral impact (0)
	management facilities?			mineral extraction or a site either existing as or allocated for a waste management facility.	mineral extraction or a site either existing as or allocated for a waste management facility.			
6. To reduce emissions of greenhouse gases from energy consumption.	There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.							
7. To reduce vulnerability and increase resilience to extreme weather events and flooding.	(7.1) Is the site within Flood Risk Zone 2 or 3?	GIS mapping of SHELAA sites SHELAA assessment on "Flood Risk"	Site is wholly within Flood Zone 1	Site contains a minimum of 80% Flood Zone 1	Site is within Flood Zone 2	Site is within Flood Zone 3a/b	Uncertain (to include commentary in appraisal)	Uncertain (to include commentary in appraisal)
	(7.2) Is the site in an area of high / medium / low / very low risk of	Environment Agency Flood Maps	Very low	Low	High	N/A	Medium Risk/ on zone boundary/ Where applicable	Where applicable



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (- -)	Uncertain / Unknown (?)	Neutral impact (0)
	flooding from surface water?							
8. To conserve and enhance biodiversity and geodiversity	(8.1) Is the site within the ZOI of a Habitats Site(s) or the IRZ of a SSSI(s)	GIS mapping / SHELAA	Site is not within an IRZ / ZOI	Site is within an IRZ but would not require consultation with Natural England	N/A	N/A	Site is within an IRZ and requires consultation with Natural England	Where applicable
	(8.2) Location of site to any NNRs / LoWSs / LNRs / CWSs / Ancient Woodland.	GIS mapping / SHELAA	N/A	Development would not have a detrimental impact	Development likely to have a detrimental impact	N/A	Where applicable	Where applicable
	(8.3) Location of site to Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	GIS mapping / SHELAA	N/A	Development would not have a detrimental impact	Development likely to have a detrimental impact	N/A	Where applicable	Where applicable



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (- -)	Uncertain / Unknown (?)	Neutral impact (0)
	(8.4) Is the site within a Bat Sustainance Zone	SHELAA	N/A	No	Yes	N/A	N/A	N/A
9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance.	(9.1) Might the site have an impact on, or harm the significance of, historical assets	Historical assets are defined as: - Scheduled (Ancient) Monuments - Listed Buildings - Registered (Historic) Parks and Gardens - Conservation Areas - Non-designated assets (such as locally listed)	No harm to the significance of a heritage asset	Mitigation of any potential harm possible.	Some harm to the significance of a heritage asset.	Substantial harm to the significance of a heritage asset.	Where applicable	Where applicable.
	(9.2) Might the site have an impact on an area known for	Site is known for archaeological value / Site lies within Archaeological	N/A	No	Yes	N/A	N/A	N/A



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (- -)	Uncertain / Unknown (?)	Neutral impact (0)
	its archaeological value.	Notification Area (SHELAA)						
10. To conserve and enhance the quality and local distinctive - ness of landscapes including the South Downs National Park	(10.1) Is the site in an area noted for its high sensitivity to change?	Pulborough – Historic Character Assessment Report (2004)	N/A	"Low" sensitivity to change	"High" sensitivity to change	N/A	"Medium" sensitivity to change	Where applicable
	(10.2) Will any Tree Preservation Orders (TPOs) be affected?	SHELAA GIS layers	No TPO(s) on site	Retainable TPOs on site	TPOs on site	N/A	TPO(s) adjacent to site	Where applicable
	(10.3) Is the site greenfield or brownfield?	SHELAA	Brownfield land	Approximately 50% brownfield / greenfield	Greenfield	N/A	Approximately 75% greenfield/25% brownfield	Where applicable
	(10.4) Is the site within	Current development boundaries and site boundary	Site is within settlement boundary	Site is predominantly within development	Site is outside development boundary and poorly related to	Site is in open countryside / detrimental impact on sensitive	Where applicable	Where applicable



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (- -)	Uncertain / Unknown (?)	Neutral impact (0)
	Development Limits?	SHELAA		boundary /Site is outside but adjacent to settlement boundary / Site is relatively well related to existing settlement(s)	the functional settlement	landscapes which cannot be mitigated.		
	(10.5) Landscape capacity assessment	Horsham District Landscape Capacity Assessment 2014	N/A	Moderate/high landscape capacity	No/Low landscape capacity	N/A	Low/moderate landscape capacity	N/A
	(10.6) Is the site within proximity to South Downs National Park?	GIS Mapping / MAGIC map	Where applicable	Outside but not adjacent	Where applicable	N/A	Adjacent / within	Where applicable
11. To achieve sustainable levels of prosperity and economic growth and	(11.1) Is the site proposed for employment development / loss of employment land?	Call-for-Sites information as submitted / SHELAA	N/A	Site is proposed for employment/ Site is proposed for mixed-use development with employment	Proposal will see a loss of identified appropriate employment land	N/A	Where applicable	Other uses



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (- -)	Uncertain / Unknown (?)	Neutral impact (0)
improve the village's retail function	(11.2) Will there be a loss of employment land (housing allocations)	Call-for-Sites information as submitted / SHELAA	N/A	Site is not currently employment land	Proposal will see a loss of identified appropriate employment land	N/A	Where applicable	Where applicable
	(11.3) Will the proposal increase rural employment opportunities in a sustainable location?	Call-for-Sites information as submitted / SHELAA Aerial mapping	N/A	Employment proposals in rural areas / the countryside (as defined) within or adjacent to existing development boundaries	N/A	N/A	Employment proposals in rural areas / the countryside (as defined) physically separated from existing development boundaries	Where applicable
12. To promote sustainable transport, walking and cycling uptake and	(12.1) Accessibility to public transport options	GIS Mapping / SHELAA	Within 800m of multiple public transport hubs	Within 800m of 1 public transport hubs	Over 800m from the nearest public transport hub	N/A	N/A	N/A
	(12.2) Accessibility issue raised in Site	Site Assessment Report 2019	N/A	No	Yes	N/A	N/A	N/A



SEA Objective	Site Criteria	Source	Potentially significant positive effect (++)	Positive (+)	Negative (-)	Potentially significant negative effect (- -)	Uncertain / Unknown (?)	Neutral impact (0)
encourage efficient patterns of movement	Assessment Report 2019	(Neighbourhood Plan evidence base document)						

4.4 The Approach to Identifying Effects

As a Neighbourhood Plan forms part of the development framework in a specific area and must adhere to the strategic policies at the District level, the 'evolution of the Plan without the implementation of the Neighbourhood Plan' is difficult to identify. This is because exiting or emerging Local Plans can or will address many of the key sustainability issues identified at the local level. The effects identified in the assessment of the Neighbourhood Plan within this SEA are therefore indicative of a change in position of current trends.

The SEA of the Plan within the SEA Environmental Report will assess the document's content against the SEA Objectives and key questions / criteria outlined in the above frameworks. The aim is to assess the sustainability effects of the document following implementation.

4.4.1 Description of Effects

The strength of impacts can vary dependant on the relevance of the policy content to certain SEA Objectives or themes. Where the policies have been appraised against the SEA Objectives the basis for making judgements within the assessment is identified within the following key:

Possible impact	Basis for judgement
++	Strong prospect of there being significant positive impacts
+	Strong prospect of there being minor positive impacts
?	Possibility of either positive or negative impacts, or general uncertainty where there is a lack on current information (to be elaborated in commentary in each instance)
0	No impact
-	Strong prospect of there being minor negative impacts and mitigation would be possible / issues can be rectified
--	Strong prospect of there being significant negative impacts with mitigation unlikely to be possible (pending further investigation) / further work is needed to explore whether issues can be rectified
N/A	Not applicable to the scope or context of the assessed content

Commentary is also included within Policy appraisals to describe the significant effects of the policy on the sustainability objectives.

5. The Effects of the Plan

5.1 The Plan's 'Framework' Policies

The Plan's 'framework' policies (Policy 1 and Policies 10-15) are those policies that set the framework for development within the Plan area, and do not allocate land for development purposes. The effects of the Plan's site allocation Policies (Policies 2-9) are instead explored separately in Section 5.2.

The following table sets out the effects highlighted for each SEA Objective within the individual assessment of the Plan's Policy 1 and Policies 10-15.

Table 4: Effects of the Plan's Land Use Policies

SEA Objective	Impacts of Policies						
	Policy 1	Policy 10	Policy 11	Policy 12	Policy 13	Policy 14	Policy 15
1	+	+	0	+	+	+	0
2	+	+	+	0	+	0	0
3	++	0	0	0	0	0	0
4	?	0	0	0	0	0	0
5	?	0	0	0	0	0	0
6	?	0	0	0	0	+	+
7	?	0	?	0	0	+	0
8	?	0	0	?	0	+	0
9	+	0	?	0	?	+	0
10	?/-	0	0	0	0	+	+
11	0	0	0	+	0	0	0
12	+	0	0	+	+	0	0

- The Plan's 'framework' policies have been assessed as having predominantly 'no impact' or neutral effects on the majority of the SEA Objectives, particularly for environmental factors of sustainability. This reflects the Plan's stance of deliberately avoiding the repetition of existing national or local planning policies.
- The proposed policies of the Plan focus on a relatively small number of key development issues

in the area and these are reflected in the positive effects identified regarding health (through multiple policies ensuring that open space and facilities pertaining to healthy lifestyles are retained or expanded), accessibility (through ensuring the retention and expansion of services and facilities), and landscape (through several policies ensuring good design and enhancing local distinctiveness).

- Policies can combine to ensure more positive outcomes on some areas of sustainability throughout the Plan area than they would do individually, particularly if they are focused on different themes.

5.2 The Plan's Site Allocation Policies

The following table sets out the effects highlighted for each SEA Objective within the individual assessment of the Plan's site allocation Policies 2-9.

Table 5: Cumulative & Synergistic Effects of the Plan's Site Allocations

SEA Obj.	Long Term Impacts of Policies								
	Policy 2	Policy 3	Policy 4	Policy 5a	Policy 5b	Policy 6	Policy 7	Policy 8	Policy 9
1	+	0	0	0	0	0	0	+	0
2	?	?	?	+	0	+	+	-	0
3	++	+	+	?	+	+	0	+	0
4	0	0	?	?	?	?	?	?	?
5	?	0	0	?	?	?	0	?	0
6	0	0	0	0	0	0	+	0	0
7	+	0	0	?	0	0	?	0	0
8	0	0	?	?	?	0	0	0	0
9	0	0	0	0	0	+	0	0	0
10	+	+	+	+	+	?	+	+	0
11	0	0	+	+	0	0	+	+	+
12	+	0	0	0	0	0	0	0	0

- Whereas SEA Objective 2 addresses accessibility, effects have been identified that regard both



road access and also access to services and facilities. Broadly, the sites allocated are all located in close proximity to services and facilities, however many of the site policies do not require access solutions to be sought of proposals. Despite this, effects are realised singularly, and not cumulatively on the whole, aside from a concern regarding access from Glebelands for the Plans' Policy 2 allocation (for 170 dwellings) and Policy 3 (for 20 dwellings). Cumulatively, and with separate access points on this narrow road, there could be negative implications from multiple developments. This SEA however only raises a concern at this stage in the absence of any firm evidence and considers that further information is likely to be included at the masterplanning stage as included within Policy 2 and dealt with at the development management stage. Effects are unknown at this stage although it should be acknowledged that West Sussex County Council Highways have not identified any of their own concerns regarding the New Place Nurseries site. The Plan also has included a Community Aim within the Plan that seeks suitable access from this site.

- Significant positive cumulative effects are assessed regarding SEA Objective 3 (meeting local housing needs). The Plan not only meets the necessary quantum of housing growth, but also ensures a mix of types, tenures and affordability through the various Plan policies.
- Uncertain cumulative effects are realised for water quality, in consideration of several allocations being in a Groundwater Source Protection Zone. Many effects are also highlighted individually regarding effects on nearby water bodies, but it is considered that these effects are not common to a single receptor.
- The potential for cumulative negative effects regarding biodiversity is raised at this point, stemming from the findings of the HRA / AA work undertaken to accompany the Plan that explored effects regarding the level of housing growth in the Plan area on the Arun Valley SPA and Mens SAC. Although the AA ensures that mitigation can be ensured, and such assurances exist through the Plan including the recommendations of the AA, more detailed effects will only be realised through the project-level HRA/AA required of each development proposal. Overall, there is uncertainty surrounding the cumulative effects regarding Habitats Sites, associated with the moving position of in-combination effects that may be identified within the project-level HRA/AAs of any of the Plan's allocations at the time of applications being submitted.
- There will be positive effects also on the allocation of numerous sites for commercial uses and employment land. Together, this can be seen to support the level of housing growth in the Plan area, and ensure that there is no significant loss of employment at the Plan level.
- Effects on landscape have been assessed as neutral. Whilst many of the Plan policies will ensure positive outcomes through policy approaches, cumulatively there will be an inevitable loss of greenfield land in areas where landscape capacity is 'low', and sensitivity is high. In response to the level of housing growth needed, the Plan does well to predominately allocate brownfield land for development and ensure that only modest growth is experienced in sensitive landscapes.

6. The Assessment of Sites

6.1 How have Site Options been identified?

As part of the process to produce the Pulborough Neighbourhood Plan, a “Call for Sites” inviting suggestions of land for potential development was conducted during August and September 2014 in the following ways:

- A “Call for Sites” section was included in the household survey that was delivered to every property in the Parish.
- Articles were placed in the Pulborough Bulletin which is delivered to every home in Pulborough parish.
- Articles were placed in the West Sussex County Times newspaper.
- Emails were sent to local developers, councils, businesses and landowners.
- Announcements were published on the Parish Council website.

Following a submission by Horsham DC to the Steering Group of the Neighbourhood Plan to review its site assessment policy, a further “Call for Sites” was sent out in May 2017.

A total of 33 sites in all were submitted for consideration, some of which had previously been submitted to Horsham DC for its Local Plan Strategic Housing & Economic Land Availability Assessment (SHELAA) in December 2018.

6.1.1 What are the ‘reasonable alternatives’?

The SEA needs to consider and compare the reasonable alternatives as the plan evolves, including preferred approaches. Planning Practice Guidance states that, *‘reasonable alternatives are the different realistic options considered in developing the policies in the plan. They need to be sufficiently distinct to highlight the different environmental implications of each so that meaningful comparisons can be made. However, it may be that the strategic policies for the neighbourhood area limit the alternatives that can realistically be considered.’*

Regarding sites, site assessment work has been undertaken by the Neighbourhood Plan Steering Group and consultants AECOM. The Pulborough Neighbourhood Plan Site Assessment Report (2019) omits sites from consideration for a number of ‘suitability’ reasons; i.e. key constraints exist on site that cannot be resolved or mitigated. Such sites were categorised red under a ‘RAG’ rating (indicating an absolute or insurmountable constraint) within that assessment and as such are deemed unsuitable for selection in the Plan as allocations and as ‘reasonable alternatives’ within this SA. In total, 12 of the 33 sites submitted have been considered inappropriate for site allocation. The reasons for the red ‘RAG’ categorisation in each instance are set out in the table below.

The AECOM Site Assessment Report also identifies two ‘Indicative Housing Capacity’ options for ‘reasonable’ sites. These are identified as firstly the figure that the landowner has identified for the site, and secondly a yield that has been identified through a ‘policy on’ mechanism, in this case a 30 dwellings per hectare calculation. This ensures that in some cases (as discussed in the table below), two different site assessments may be applicable in this SEA Environmental Report. It should be noted that within the SEA, alternatives are identified as those that are ‘sufficiently distinct’ to highlight the different environmental

implications of each so that meaningful comparisons can be made. It is possible that different housing yields at a site would be extremely unlikely to be sufficiently distinct and not have any different environmental considerations, for instance if the difference in yield is very small.

Discussion of whether this applies in each instance is included in the following table.

Table 6: Sites included within the SEA (allocations and alternatives)

Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant
		Landowner assumption	@ 30 dwellings per hectare		
PPNP01	West Glebe Field	8	46	The difference between the 'landowner assumption' and 'policy-on' yields for the site is sufficiently large to warrant additional assessment.	- PPNP01(a) – 8 dwellings - PPNP01(b) – 46 dwellings
PPNP02	Land north of Church House	N/A	N/A	The AECOM Site Assessment Report identifies that this site is not currently available / developable. As such it is not considered a 'reasonable alternative.'	N/A
PPNP03	Police Station	Unknown	4	The site will be assessed at a yield of 4 dwellings.	There are no reasonable additional alternative yields for this site.
PPNP04	Railway Station Industrial Estate	N/A	N/A	The AECOM Site Assessment Report identifies that this site is not currently available / developable. As such it is not considered a 'reasonable alternative.'	N/A
PPNP05	Land off Station Approach	27	18	This site is currently allocated within the Neighbourhood Plan within Policy 4 for a yield of 18 dwellings. The difference between the 'landowner assumption' and 'policy-on' yields	- PPNP05(a) – 18 dwellings - PPNP05(b) – 27 dwellings

Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant
		Landowner assumption	@ 30 dwellings per hectare		
				for the site is sufficiently large to warrant additional assessment.	
PPNP06	Harwoods Land Rover Bentley	39	31	This site is currently allocated within the Neighbourhood Plan within Policy 5a for a yield of 15 dwellings. The difference between the 'landowner assumption' and the yield for which the site is allocated is sufficiently large to warrant additional assessment.	- PPNP06(a) – 15 dwellings - PPNP06(b) – 31-39 dwellings
PPNP07	Land rear of 23-35 London Road	9	8	This site is currently allocated within the Neighbourhood Plan within Policy 5b for a yield of 9 dwellings. The 'landowner assumption' and 'policy-on' yields for the site are similar and not considered sufficiently distinct to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP08	46 London Road	1	1	The site will be assessed at a yield of 1 dwelling.	There are no reasonable additional alternative yields for this site.
PPNP09	New Place Nurseries	100	206	This site is currently allocated within the Neighbourhood Plan within Policy 2 alongside PPNP10 (below) for a yield of 170 dwellings. The difference between the 'landowner assumption' and 'policy-on' yields for the site is sufficiently large to warrant additional assessment.	- PPNP09/10(a) – 170 dwellings - PPNP09/10(b) – 316 dwellings - PPNP09(c) – 206 dwellings
PPNP10	Land adjacent to Drovers Lane	73	110		PPNP10(d) – 110 dwellings
PPNP11	Land off Glebelands	21	17	This site is currently allocated within the Neighbourhood Plan	There are no reasonable additional

Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant
		Landowner assumption	@ 30 dwellings per hectare		
				within Policy 3 for a yield of 20 dwellings. The 'landowner assumption' and 'policy-on' yields for the site are similar and not considered sufficiently distinct to warrant additional assessment.	alternative yields for this site.
PPNP12	Royal Mail Sorting Depot	N/A	N/A	The AECOM Site Assessment Report identifies that this site is not currently available / developable. As such it is not considered a 'reasonable alternative.'	N/A
PPNP13	East Glebe Field	72	81	The difference between the 'landowner assumption' and the 'policy-on' yields is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP14	Ambulance Station	N/A	N/A	The site has planning permission and is therefore not included within the scope of this SEA or the Plan.	N/A
PPNP15	15 The Spinney	4	4	The site will be assessed at a yield of 4 dwellings.	There are no reasonable additional alternative yields for this site.
PPNP16	Pulborough Garden Centre	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site is not currently available / developable for housing development. As such it is not considered a 'reasonable alternative.'	There are no reasonable additional alternative uses for this site.

Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant
		Landowner assumption	@ 30 dwellings per hectare		
				The site is identified within the Neighbourhood Plan Policy 9 as a site in which support will be given for proposals to intensify or extend the existing garden centre. The site will be assessed for employment uses within the area defined on the Plan's proposals map.	
PPNP17	Land at Highfield	25	26	This site is currently allocated within the Neighbourhood Plan within Policy 5b for a yield of 26 dwellings. The 'landowner assumption' and 'policy-on' yields for the site are similar and not considered sufficiently distinct to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP18	Coombelands Equestrian Site 1	60	45	The difference between the 'landowner assumption' and the 'policy-on' yields is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP19	Coombelands Equestrian Site 2	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding landscape (the site is in area 40 of the HDC Landscape Capacity Assessment Report with no or low capacity for large scale housing development), access, sewerage and drainage. As such it is not considered a 'reasonable alternative.'	N/A

Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant
		Landowner assumption	@ 30 dwellings per hectare		
PPNP20	Biarritz	31	16	The difference between the 'landowner assumption' and 'policy-on' yields for the site is sufficiently large to warrant additional assessment.	• PPNP20(a) – 31 dwellings • PPNP20(b) – 16 dwellings
PPNP21	Minto	6	11	The difference between the 'landowner assumption' and the 'policy-on' yields is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP22	Greendene Nurseries	75	56	The difference in housing yield is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP23	Puttocks Farm	291	218	The difference in housing yield is not considered sufficiently large to warrant additional assessment.	There are no reasonable additional alternative yields for this site.
PPNP24	Land South of Broomers Hill Park	Unknown	90	This 3ha site has been assessed for a yield of 90 dwellings. There is no yield known as having been submitted by the landowner. This site has been allocated for employment use within Policy 7 and will be assessed for employment uses within the area defined on the Plan's proposals map.	• PPNP24(b) – employment use • PPNP24(a) – 90 dwellings
PPNP25	Land North of Broomers Hill Park	Unknown	Approx.60	No specific proposed land use is known for this site. This site has been assessed for a yield of approximately 60 dwellings based on a broad	• PPNP25(a) – 60 dwellings • PPNP25(b) – employment use

Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant
		Landowner assumption	@ 30 dwellings per hectare		
				assumption related to the size of the site. There is no yield known as having been submitted by the landowner. The site is also assessed for employment use due to the allocation of nearby land for such a use and the prevalence of employment uses in the broad area.	
PPNP26	Smyth Trust Grazing Land	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding its remoteness from the built up area boundary, its distance from community facilities and services, effects on landscape and settlement pattern, heritage, traffic, sewerage and drainage. As such it is not considered a 'reasonable alternative.'	N/A
PPNP27	Land at Toat Café and Lorry Park	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site for housing development, demonstrating that this site has issues surrounding its remoteness from the built up area boundary, its distance from community facilities and services, effects on landscape and settlement pattern, heritage, traffic, sewerage and drainage. As such it is not considered a 'reasonable alternative' for housing development.	N/A

Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant
		Landowner assumption	@ 30 dwellings per hectare		
				This site has been allocated for employment and will be assessed for employment uses within the area defined on the Plan's proposals map.	
PPNP28	Murrells	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding its remoteness from the built up area boundary and distance from community facilities and service. As such it is not considered a 'reasonable alternative.'	N/A
PPNP29	Mare Hill House	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding the site's availability. It can not be demonstrated that the site can come forward within the Plan period.	N/A
PPNP30	Land at Batts Lane	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding its remoteness from the built up area boundary and distance from community facilities and services. As such it is not considered a 'reasonable alternative.'	N/A
PPNP31	Longlands	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating	N/A

Site reference	Site name	Indicative housing capacity (from AECOM Site Assessment)		Discussion regarding 'reasonable alternatives.'	Reference to additional alternatives if relevant
		Landowner assumption	@ 30 dwellings per hectare		
				that this site has issues surrounding its remoteness from the built up area boundary, its distance from community facilities and services, access, and effects on trees. As such it is not considered a 'reasonable alternative.'	
PPNP32	Carpe Diem	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding the site's availability. It can not be demonstrated that the site can come forward within the Plan period.	N/A
PPNP33	Manor Farm	N/A	N/A	The AECOM Site Assessment Report identifies a red 'RAG' rating for the site, demonstrating that this site has issues surrounding the site's availability. It can not be demonstrated that the site can come forward within the Plan period. As such it is not considered a 'reasonable alternative.'	N/A

The following table outlines a summary of the effects identified in the detailed assessment of sites within the main SEA Environmental Report. A 'RAG' system has been included that outlines the expected effect for each of the SEA Objectives and assessment criteria.

Table 7: Site assessment summary of effects (allocations and alternatives)

[illegible]

[illegible]

[illegible]

[illegible]

6.3 The Reasons for Selecting and Rejecting Alternative Options

The allocation of the sites within the Neighbourhood Plan is supported by the findings of this SEA Environmental Report. Although the effects identified cannot be quantified (i.e. an overall sustainability 'score' calculated) due to some criteria being more critical to a site's sustainability than others (including the ability to mitigate effects), the sites can generally be considered to have the least amount of identified negative, and the most amount of positive effects.

In conformity to the core principles of the NPPF the sites are within or adjacent the development boundary, represent previously developed land where possible and can be seen to offer significant benefits in housing and employment land delivery. The sites are also in close proximity to numerous key services and facilities within the Plan area, including rail and bus links.

The following table outlines the Parish Council's reasons for selecting and rejecting each of the sites assessed above.

Table 8: Reasons for the Selection / Rejection of Site Options

Site Ref.	Reasons for Selection / Rejection
Preferred Site Allocations within the Neighbourhood Plan	
PPNP09/10	This policy allocates New Place Farm Nursery located on the northern edge of Pulborough village and the land immediately to the south of the nursery, for a housing scheme that may comprise 174 homes. The land is available for development and as a large scale proposal that will deliver the majority of the Parish's local housing needs, is preferred to options in the Codmore Hill area which has experienced multiple recent planning permissions.
PPNP11	The land has been made available for this purpose by the landowner. The land creates the opportunity to establish a Community Land Trust scheme to deliver a mix of self-build and affordable homes (to be retained in perpetuity for local people). A Trust has recently been formed and is expected to bring forward a scheme as a normal planning application for this land in due course.
PPNP05(a)	The site is potentially suitable, available and achievable, and scored an 'amber' rating in the Site Assessment Report, indicating that on-site constraints are not significant and can be overcome. The site was one of the best performing sites within the Site Assessment Report and is within the existing built-up area boundary close to services, facilities and public transport links. Recent housing developments local to this site have highlighted the need to provide public/community services and support would be given to commercial enterprises of this nature within the site.
PPNP06(a)	The site is potentially suitable, available and achievable, and scored an 'amber' rating in the Site Assessment Report, indicating that on-site constraints are not significant and can be overcome. The site was one of the best performing sites within the Site Assessment Report and is within the existing built-up

Site Ref.	Reasons for Selection / Rejection
	area boundary close to services, facilities and public transport links.
PPNP07	The site is potentially suitable, available and achievable, and scored an 'green' rating in the Site Assessment Report, indicating that only minor on-site constraints exist and can be overcome. The site was the best performing sites within the Site Assessment Report and is within the existing built-up area boundary close to services, facilities and public transport links.
PPNP17	This land is available, developable and deliverable. The Plan states that development affords a natural infill on the western side of Sopers Hill and is in close proximity to much of the existing recreational and community facilities.
PPNP24	The allocation of this site encourages new employment development at the most appropriate location in the parish. The site adjoins an existing business area on the edge of Codmore Hill and can be accessed from the A29. The Plan states that this new allocation will significantly increase the total area of business land in the village to provide local jobs, which will help reduce the high levels of out-commuting.
PPNP27	The site is allocated as redevelopment of the land currently partially occupied by the Toat Café (but including a wider area of previously used land that has no beneficial use) will ensure an attractive gateway into the village, and the National Park, from the main northern direction.
PPNP16	An appropriate expansion of the popular garden centre to the west of the village will create more jobs but only within defined area to minimise impact on the National Park. Development of the site also protects the South Downs Light Railway which is a highly valued visitor attraction within the Centre.

Rejected Site Options / Alternatives

PPNP01	Site PPNP01 is within the village Conservation Area and has been recommended by the community for designation as an open green space unsuitable for housing development. The area is contained within the Local Green Spaces Study, which is an appended document supporting Policy 14 within the Pre-Submission Plan.
PPNP03	The site is within a Conservation Area and in relatively close proximity to the Grade I listed Church of St Mary to the south, and also numerous Grade II listed buildings to the south. The site is also located in an area with the potential for archaeological deposits associated with the Pulborough Historic Core Archaeological Notification Area.
PPNP08	The site has a capacity to accommodate only six or fewer houses and is considered a windfall site. It has therefore not been included within the PPNP.

Site Ref.	Reasons for Selection / Rejection
PPNP13	Site PPNP13 is within the village Conservation Area and has been recommended by the community for designation as an open green space unsuitable for housing development. The area is contained within the Local Green Spaces Study, which is an appended document supporting Policy 14 within the Pre-Submission Plan.
PPNP15	The site has issues surrounding access to the existing road network, as identified within the Site Assessment Report. Proposed for only four dwellings this site has not been considered within the PPNP due to its low dwelling yield.
PPNP18 PPNP20 PPNP21 PPNP22 PPNP23	The site Assessment Report states that, ○ It has long been the contention that any further development above the roundabout on Codmore Hill is unsustainable. ○ The A29 has recently been upgraded to be part of the Major Road Network. This upgrading is the result of studies having been undertaken which have shown that there has been a significant increase in vehicles on this road and it can no longer be classified as a Local Lorry Network route. Pedestrians will therefore be at greater risk from exhaust fumes. ○ All the main infrastructure such as schools, primary care, village hall and recreational facilities are located south of the railway bridge. ○ Paragraph 3.27 within the Pre-Submission Plan refers to safer crossings needed across the railway. Two new footbridges are proposed. ○ The first footbridge is close to the southern side of Pigeon Gate Bridge which carries the A29 across the railway. Section 106 monies have already been set aside to mitigate the dangers to pedestrians on this bridge but as yet no action has been instigated. ○ The second footbridge is to enhance Footpath No. 2330 to enable pedestrians from Codmore Hill to avoid walking and cycling beside the busy main road to reach the school and other parts of the village. A bridge over the railway and the replacement of steps up the hillside with a sloping path will be necessary. These five sites to the north of the Codmore Hill roundabout (PPNP18; PPNP20; PPNP21; PPNP22 and PPNP23) are considered unsustainable for the reasons given above.
PPNP25	The site has been rejected as it is distanced from the built-up area boundary, there are landscape concerns, and has additional surface water flood risk issues.



7. Conclusions & Recommendations (including Mitigation)

7.1 Summary of Effects highlighted in this SEA

This conclusions section sets out the effects of the Plan 'as a whole' on each of the SEA Objectives in consideration of both the Plan's policies and site allocations. The conclusions are set out under a sub-heading per SEA Objective.

7.1.1 To improve the health of the population overall and reduce health inequalities

Positive effects

In consideration of the Plan's policies and site allocations, positive effects can be expected regarding health and promoting healthy lifestyles. The proposed policies of the Plan focus on a relatively small number of key development issues in the area and these are reflected in the positive effects identified regarding health (through multiple policies ensuring that open space and facilities pertaining to healthy lifestyles are retained or expanded).

7.1.2 To ensure services and facilities are accessible for all and the inclusion of necessary infrastructure

Uncertain / positive effects

Positive effects can be considered regarding the location of the site allocations and distances to a wide range of services, facilities and employment opportunities. In regard to road access however, there is a degree of uncertainty at this stage as many of the site policies do not require access solutions to be sought of proposals despite issues being identified. Despite this, there is a concern regarding access from Glebelands for the Plans' Policy 2 allocation (for 170 dwellings) and Policy 3 (for 20 dwellings). Together, and with separate access points on this narrow road, there could be negative implications from multiple developments. This SEA however only raises a concern at this stage in the absence of any firm evidence and considers that further information is likely to be included at the masterplanning stage as included within Policy 2 and dealt with at the development management stage. Effects are unknown at this stage although it should be acknowledged that West Sussex County Council Highways have not identified any of their own concerns regarding the New Place Nurseries site. The Plan also has included a Community Aim within the Plan that seeks suitable access from this site.

7.1.3 To meet the housing requirements of the whole community

Significant positive effects

Significant positive cumulative effects are assessed regarding SEA Objective 3 (meeting local housing needs). The Plan not only meets the necessary housing figure required, but also ensures a mix of types, tenures and affordability through the various Plan policies.

7.1.4 To ensure no deterioration of water quality

Uncertain effects

Uncertain effects are realised for water quality, in consideration of several allocations being in a Groundwater Source Protection Zone. Many effects are also highlighted individually regarding effects on nearby water bodies, but it is considered that these effects are not common to a single receptor. The lack of policy direction on a number of thematic environmental areas of sustainability within the Plan, with a stance that the Plan not repeat District and National policy, leads to uncertain effects overall.

7.1.5 To maintain and where possible improve air and noise quality

Uncertain effects

The potential for noise effects have been identified for a number of site allocations due to site proximity to main roads and the railway line. Effects regarding noise have been identified cautiously, yet it is acknowledged that other factors such as building materials and topography are likely to address these issues outside and regardless of the Plan's influence. The Plan adopts a stance of not repeating District and National policy, however again cautiously uncertain effects have been identified overall.

7.1.6 To reduce emissions of greenhouse gases from energy consumption

Positive effects

The Plan includes that some commercial land allocations should ensure high standards of energy efficiency, and this is replicated through framework policy that requires best practice standards to be met.

7.1.7 To reduce vulnerability and increase resilience to extreme weather events and flooding

No effects

Although some of the site allocation policies include areas of land that have a high risk from surface water flooding, overall effects are considered neutral in light of Sustainable Drainage System (SuDS) requirements



being included within policies where potential issues are most significant.

7.1.8 To conserve and enhance biodiversity and geodiversity

Uncertain effects

The need for specialist ecological work (Habitats Regulations Assessment (HRA) / Appropriate Assessment (AA)) to be undertaken at the Plan level indicates that effects on biodiversity will be negative related to the level of housing growth set out within the Plan. The findings of the AA work lead to a number of policy recommendations regarding effects that site allocations will have on Habitats Sites (the Arun Valley Special Protection Area (SPA) and Mens Special Area of Conservation (SAC)) which are designated as of European importance. These recommendations have been factored in to the relevant Plan policies to ensure that mitigation is secured to enable the development proposals identified within the Plan. Despite this, effects are uncertain overall pending the findings and mitigation proposed within project-level HRA/AA work that is required of all development proposals.

7.1.9 To conserve and where appropriate enhance areas and assets of historical and archaeological importance

Uncertain / neutral effects

Uncertain to neutral effects are identified at this strategic stage. It is difficult to assess with any certainty whether a site allocation would have a negative effect on a heritage asset based on proximity alone and many details of forthcoming schemes are not available or necessarily appropriate to assess in the absence of a consistent level of information for all preferred and rejected site options. Neutral effects can however be expected as a result of Plan policies, and the introduction of site policy criteria for many site allocations within the Plan, as per recommendations made within a previous iteration of the SEA.

7.1.10 To conserve and enhance the quality and local distinctiveness of landscapes including the South Downs National Park

Neutral effects

Effects on landscape have been assessed as neutral. Whilst many of the Plan policies will ensure positive outcomes through policy approaches, cumulatively there will be an inevitable loss of greenfield land in areas where landscape capacity is 'low' and sensitivity is high. In response to the level of housing growth needed, the Plan does well to predominately allocate brownfield land for development and ensure that only modest growth is experienced in sensitive landscapes.



7.1.11 To achieve sustainable levels of prosperity and economic growth and improve the village's retail function

Positive effects

There will be positive effects also on the allocation of numerous sites for commercial uses and employment land. Together, this can be seen to support the level of housing growth in the Plan area, and ensure that there is no significant loss of employment at the Plan level.

7.1.12 To promote sustainable transport, walking any cycling uptake and encourage efficient patterns of movement

No effects

The Plan ensures that all residential and mixed-use allocations are accessible to public transport nodes, as a key consideration in the site selection methodology included within the Plan's accompanying Site Assessment Report (2019). No policy considerations address any need for improved public transport infrastructure, which would lead to positive effects, and so there can be expected to be a continuation of the baseline position.

7.2 Recommendations made throughout the SEA

As outlined within the assessment of individual policies, a previous iteration of the SEA included many recommendations that have been since integrated into the latest version of the Neighbourhood Plan. The following recommendations represent those that have been made of the latest version of the Neighbourhood Plan and have been made for single policies throughout the SEA process. These are:

7.2.1 Policy 4: Land off Station Approach, Pulborough

Of the uncertain effects identified within the detailed sites assessment a number of these are not covered by the site Policy. These include the potential for contamination on site due to the site's previous land use and traffic / accessibility. It is recommended that Policy criteria are included that address these issues, requiring further evidence to support any forthcoming planning application.

7.2.2 Policy 5a: Land at Harwoods Garage, Pulborough, on eastern side of A29

Issues surrounding surface water flood risk should however be addressed in the Policy in so far as they can shape the design of any scheme and are therefore relevant to other Policy 5a criteria. It is recommended that Policy criteria are included that address these issues, requiring further evidence to support any forthcoming planning application, including the requirement for SuDS.



7.2.3 Policy 5b: Harwoods Car Park, Pulborough, on western side of A29

The Policy could seek further information at the planning application stage to address any water quality concerns surrounding the water body a short distance from the site.

7.2.4 Policy 6: Land at Highfields

Issues surrounding landscape should be addressed within the Policy through suitable policy criteria (the site is also in an area of moderate sensitivity to change) and the requirement for suitable assessment respectively.

A small water body exists 50-100m from the site. The implications of this should be addressed at the planning application stage and a criterion for further assessment could be incorporated into the Policy.

7.2.5 Policy 7: Broomers Hill Industrial Estate, Codmore Hill

Issues surrounding surface water flood risk and water quality are not addressed within the Policy. It is recommended that the Policy require a suitable assessment addressing both of these issues at the planning application stage and the incorporation of SuDS where necessary.

7.2.6 Policy 8: Land formerly known as the Toat Café, Stane Street, Pulborough

It is recommended that, in light of the effects that can be expected on any new residents of the site in regard to accessibility issues, enabling residential development is not included within the Policy and that the alternative option is progressed.

The Policy does not seek that any forthcoming planning application seek to identify issues surrounding water and if necessary, address them on site. It is recommended that a policy criterion addressing this is included.

7.2.7 Policy 9: Pulborough Garden Centre, Stopham Road

Uncertain effects regarding the site's proximity to a small water body were identified in the detailed site assessment of the site. This consideration has not been factored into the site Policy and it is recommended that a criterion addressing this concern is included.



8. Next Steps

8.1 Consulting on the SEA Environmental Report

The next stage in the SEA and plan-making process is to consult on this Environmental Report with the statutory consultees, those being:

- The Environment Agency
- Historic England
- Natural England

The SEA Environmental Report will also be subject to consultation with the public and any other interested bodies and parties. This SEA Environmental Report will be made available alongside the Neighbourhood Plan for the Pre-submission consultation (Regulation 14). Consultation is required of the Plan and the SEA Environmental Report at this stage in order for the Plan to meet necessary basic conditions tests.



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March 2020



Essex County Council