

# DRAFT SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE REG.14 SOUTHWATER NEIGHBOURHOOD PLAN

by Southwater Parish Council

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## 1.0 INTRODUCTION

- 1.1 In accordance with European and National Legislation, Neighbourhood Plans must be subject to a Strategic Environmental Assessment, particularly if they may have a significant effect (positive or negative) on the environment. In addition, it is strongly recommended that a wider Sustainability Appraisal is undertaken.
- 1.2 A Neighbourhood Plan, once made, becomes a formal part of the planning system and will be a Local Development Plan document. The Southwater Parish Neighbourhood Development Plan (SPNP) is an important planning tool for shaping the development and growth of the village and Parish.

#### **Sustainable Development**

- 1.3 Sustainable development is defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs" (Brundland Report 1987). It is about ensuring better quality of life for everyone, now and for generations to come. In doing so, social, environmental and economic issues and challenges should be considered in an integrated and balanced way.
- 1.4 The National Planning Policy Framework (NPPF) was published in March 2012. This document sets out the Government's planning policies for England. The NPPF states the Government's intentions with regards to sustainable development, in particular the need for the planning system to perform a number of roles.

## What is a Sustainability Appraisal?

- 1.5 This Sustainability Appraisal (SA) aims to predict and assess the social, environmental and economic effects that are likely to arise from the adoption of the Southwater Parish Neighbourhood Development Plan (SPNP) and to ensure that the policies within it contribute to and promote sustainable development. The Parish Council at Southwater has taken the view that a SA is required to accompany the SPNP in addition to the statutory SEA process.
- 1.6 A Strategic Environmental Assessment (SEA) involves the evaluation of the *environmental* impacts of a plan such as the Neighbourhood Plan. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the "Environmental Assessment of Plans or Programmes Regulations 2004".
- 1.7 The SEA process is very similar to the Sustainability Appraisal process set out through national guidance. Government guidance suggests incorporating the SEA process into the Sustainability Appraisal process and to consider the *economic and social* effects of a plan alongside the environmental effects considered through SEA. For simplification, this report is referred to as the Sustainability Appraisal (SA) throughout.
- 1.8 Key points for this SEA/SA

- SEA/SA aims to make a plan more sustainable and more responsive to its environmenta, economic and sociall effects, by identifying the plan's significant impacts and ways of minimising its negative effects;
- It also documents the 'story' of the plan why the plan is the way it is and not something else. This is for the benefit of the public, statutory consultees and examiners/inspectors;
- SEA/SA can best influence the plan at the alternatives and mitigation stages, so these require particular focus;
- SEA/SA should focus on key issues and effects, scope out insignificant effects, and not include unnecessary information.

# **The Scoping Report**

- 1.9 A Scoping Report was prepared in February 2016. The report identified the sustainability issues within Southwater and set out a series of draft sustainability objectives for the SA of the Neighbourhood Plan. These objectives build upon the strategic and sustainability objectives within the Horsham District Planning Framework 2015 (and accompanying Sustainability Appraisal), expanding upon these to provide a local focus on the needs and aspirations of the Southwater community.
- 1.10 The Scoping Report was the subject of consultation with a number of agencies and stakeholders including Natural England, Environment Agency, Historic England, Horsham District Council, West Sussex County Council, Southwater District and County Councillors, Southern Water, South East Water, Sussex Police and NHS Sussex. The full list of consultees can be found in **Appendix 1**.
- 1.11 The comments and responses received mainly related to the Sustainability Objectives and these have been incorporated into this document.

# **Habitat Regulations Assessment**

- 1.12 It should be noted that this is a draft Sustainability Appraisal that has been published alongside the Draft Reg.14 Southwater Neighbourhood Plan and has been prepared without a formal Habitat Regulations Assessment (HRA) being completed. It is considered important for the HRA to be prepared knowing the plan's proposals this assessment has been completed with the likely results of the HRA in mind.
- 1.13 A HRA will be requested from Horsham District Council alongside the Regulation 14 consultation. This draft SA will be updated prior to submission as needed following the conclusion of the HRA. This will ensure the most up to date habitat data has been included in the SA process

## 2.0 BACKGROUND & CONTEXT

## **Neighbourhood Planning**

- 2.1 Neighbourhood planning is a tool that allows communities to decide the future of the places they live and work. The Government states that neighbourhood planning empowers communities to shape the development and growth of a local area through the production of a neighbourhood development plan, a neighbourhood development order or a community right to build order. Neighbourhood plans will enable local people to consider policies on whether there are enough homes in their area, on town centre revitalisation, on the protection of green spaces, and opportunities for regeneration for example<sup>1</sup>. The basis for the new form of local planning is set within the Localism Act 2011 and the NPPF 2012.
- 2.2 The NPPF sets out the relationship and conformity between the Local Plan and the Neighbourhood Plan. Paragraphs 184 and 185 summarise the position. The ambition of the neighbourhood plan should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the *strategic policies* of the Local Plan. Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area.

## The Southwater Parish Neighbourhood Plan

2.3 **Appendix B** shows the boundary of the SPNP. The Plan includes the settlement of Southwater and covers the extent of the Parish administrative boundary. It also includes Christ's Hospital, Southwater Country Park, sections of the A24 trunk Road and the Downs link Bridleway. The Horsham Park & Ride site and waste recycling site is located to the north of the Plan boundary. The northern boundary abuts the southern built up area of Horsham.

## **The Policy Framework**

2.4 Horsham District Council (HDC) has prepared a new planning framework which will contain the planning policies for the District and will be used to help decide what development can take place and where. It is known as the Horsham District Planning Framework (HDPF). HDC submitted the Framework 2014 to the Secretary of State on Friday 8 August 2014 for independent examination. Public hearing sessions were held between 4 November 2014 for a period of three weeks closing on Wednesday 19 November 2014. The Council received the Inspector's Final Report on 8<sup>th</sup> October 2015. The report concludes that the Plan is sound, subject to modifications. The Horsham District Planning Framework, incorporating the Inspector's modifications as set out in his Final Report was presented at an Extraordinary Council meeting on 19 November 2015 for adoption. The Horsham District Planning Framework was formerly adopted on the 27<sup>th</sup> November 2015. The Framework

<sup>&</sup>lt;sup>1</sup> http://www.communities.gov.uk/planningandbuilding/planningsystem/neighbourhoodplanningvanguards/

contains planning policies for the district outside the South Downs National Park for the period up to 2031.

- 2.5 The key elements of the Framework are:
  - Development should take place at Horsham first, followed by Southwater and then Billingshurst along with some development in other villages in accordance with Neighbourhood Plans, which are currently being produced by communities across the district.
  - The need to retain good employment sites to support the local economy and growth in the Gatwick Diamond area as a whole is justified and sound.
  - The housing requirement for the Plan period should be at least 16,000 dwellings at a rate of 800 dwellings per year.
  - Three strategic development areas should be brought forward for 'at least' 2,500 dwellings at North Horsham, around 600 dwellings west of Southwater and around 150 dwellings south of Billingshurst.
  - In order to ensure that the District can continue to deliver 800 homes per year across the plan period, the plan will be subject to an early review, to commence within three years. Land west of Southwater, land east of Billingshurst and land at Crawley were all identified as areas to be revisited through this process<sup>2</sup>.
- 2.6 The Southwater Parish Neighbourhood Plan will need to comply with both national and local planning policies as set out in the NPPF. A review of the key local policy documents and strategies has been undertaken for the SPNP. The aims and objectives from these policy documents, together with the Sustainability Issues for Southwater (section 3 of this report) have been used to develop the SPNP sustainability framework set out in chapter 4.

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<sup>&</sup>lt;sup>2</sup> <u>https://www.horsham.gov.uk/latest-news/news/october-2015/inspector-finds-councils-plan-sound</u> [accessed 18th November 2015]

## 3.0 STRUCTURE AND METHODOLOGY

3.1 Moving forward this assessment will consider how the proposed Southwater

Neighbourhood Plan scores against the Sustainability Objectives. This section summarises
the approach intended to be taken:

## Consideration of reasonable alternatives

- 3.2 It is a requirement of legislation, that the Strategic Environmental Assessment process considers 'reasonable alternatives' to the plan. The first step will be to consider the issues and options facing the parish and the best way to address these. For each major policy direction a number of alternatives will be considered.
- 3.3 It should be noted that 'alternatives are not needed for every plan issue. A 'policy versus no policy' comparison of alternatives is necessary only where 'no policy' is under active consideration by the planning team. Where only one alternative is reasonable, then looking at other alternatives is not 'reasonable'. Not meeting objectively assessed housing need and going against Government policy are also generally not 'reasonable'.'
- 3.4 Where an alternative is considered unreasonable, the reasons for this will be clearly documented and could relate to a wide range of factors including national planning policy or strategic planning policies contained within the development plan.
- 3.5 The preferred alternatives will be selected by the Steering Group and a draft plan prepared

#### Consideration of effects

3.6 Once a draft plan has been prepared its effects need to be assessed.

#### Assessment of plan policies

- 3.7 The chosen policies will be considered against the Sustainability Objectives using a ++ / + / 0 / / -- scale to indicate Very Positive effects through to a Very Negative effect. Where the effect is uncertain a '?' would be used.
- 3.8 A judgement will be made regarding the significance of each effect and this will be clearly set out. Broadly speaking the significance of an effect will relate to;
  - The magnitude of the effect
  - The sensitivity of the receiving environment, including the value and vulnerability of the area, exceeded environmental quality standards, and effects on designated areas or landscapes

<sup>&</sup>lt;sup>3</sup> STRATEGIC ENVIRONMENTAL ASSESSMENT - Improving the effectiveness and efficiency of SEA/SA for land use plans 2018. Commissioned by RTPI South East and Written by Levett-Therivel

• Effect characteristics, including probability, duration, frequency, reversibility, cumulative effects, transboundary effects, risks to human health or the environment, and the magnitude and spatial extent of the effects.

#### **Cross-border effects**

3.9 Should the plan give rise to any significant effects outside of the plan area these will be identified and the approach to address these effects will be clearly documented. The relative proximity to areas of land within Mid Sussex District as well as parishes within HDC will be considered, with neighbouring Districts and Parishes being consulted during the plan preparation process including any cumulative impacts that may arise as a result of development proposals in these areas (see para 5.12)

#### Mitigation of effects

- 3.10 Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of SEA/SA. Mitigation includes deleting or adding policies, and changing policy wording. Where mitigation is required it will be considered using the following hierarchy:
  - Avoid effects altogether
  - Reduce/minimise effects,
  - Offset effects (allow negative effects to happen but provide something positive to make up for it)

## Total, Cumulative and In-Combination effects

- 3.11 Once the above has been considered the total cumulative and in-combination effects of the plan will be considered by compiling one table of all the proposed policies' effects and summarising the total and cumulative effects of the plan. The difference between these two assessments are:
  - Total effects are all of the plan's effects
  - Cumulative effects are all of the plan's effects plus all other actions not influenced
    by the plan, including people's behaviour and other underlying trends. They can arise
    where several developments each have insignificant effects but together have a
    significant effect
  - *In-Combination (or Synergistic) effects* are when effects interact to produce a total effect greater than the sum of the individual effects.

#### Plan Review

3.12 The results of the SA/SEA will be used to review and update the proposed plan as necessary to ensure that the plan provides an appropriate approach to securing sustainable development across the plan area.



## 4.0 **SOUTHWATER – SUSTAINABILITY ISSUES**

- 4.1 As part of the Sustainability Appraisal it is necessary to identify the key sustainability issues facing the parish. These have been informed through the following sources:
  - A review of the plans and policies produced by Horsham District Council where reference is made to Southwater.
  - An analysis of baseline data on Southwater.
  - An assessment of feedback from consultation events undertaken by the Parish Council for the neighbourhood plan to date (March and summer 2014) and the survey results 2015<sup>4</sup>.
  - The SA produced for the Horsham District Planning Framework.

#### **Key Messages**

4.2 This section considers the key headline information relating to Southwater.

#### **Background and Demographics**

4.3 Southwater is situated 2 miles south of Horsham and markets itself as a large village. The Parish of Southwater has an estimated population of 10,025, with around 9,490 of this in Southwater itself. This population has grown by 28% in the last 10 years and the Parish is characterised as having one of the youngest populations in England with only 9.1% of residents being in the 65+ category. Evidence suggests that the people who come into Southwater tend to stay, with 74% having been in the Parish for 6 or more years. The younger population is concentrated in the newer housing development and around the schools and more residents have children in the infant and junior schools than at secondary schools or at Sixth Form College<sup>5</sup>.

#### Housing

- 4.4 The 2009 Southwater Community Action Plan identified housing supply shortfalls for first time buyers and for young people who need to find accommodation outside the family home. A need for supported housing, key-worker housing and shared ownership was therefore identified. The plan also recognises the aspiration that self sufficient and nursing accommodation for the elderly and disadvantaged is required. As such housing which addresses these areas, must be included in all new developments both large and small.
- 4.5 In terms of ownership, just over 29% of property is owned outright with 50% owned with a mortgage. Only 0.5% of property is rented from the Local Authority with 7.1% rented

<sup>&</sup>lt;sup>4</sup> http://www.southwater-pc.gov.uk/Neighbourhood-Plan-.aspx

<sup>&</sup>lt;sup>5</sup> Draft Interim Statement: Managing Development in Horsham District January 2011

through a private landlord/agency. Average house prices include £302, 932 for a 2 bedroom, £384,361 for a 3 bedroom property and £619,080 for a 4 bedroom house<sup>6</sup>.

# Open Space and Community

- As there is currently no secondary school in Southwater, around 500 pupils are presently bussed daily from Southwater to schools in Horsham. Southwater secondary provision is provided mainly at Tanbridge House School. The redevelopment of the village shopping centre and creation of Lintot Square were accomplished in 2006. The development includes a health centre, café, the Lintot family pub, shops, post office, affordable housing, car parking and Beeson House, which houses the library, youth club, council offices and police offices.
- 4.7 The 35 hectare Southwater Country Park was created on the site of the former brickworks at Lennox Wood and the old railway track became part of the Downs Link. These, together with Pond Farm Ghyll, the Shaw on the remains on Reeds Lane from Easteds Farm House to the bypass, serve to bring the countryside into the heart of the village.

## Employment and Economy<sup>7</sup>

4.8 Historically, farming has been the industry in the village and surrounding hamlets. However, over the years the parish has been the home of timber and Horsham stone production and more recently brick making. Today the village has two industrial estates, one alongside the Country Park housing the IBM computer centre and a Sony DVD and Bluray manufacturing facility, the other, at the north end close to the A24 where units benefit from full B1 planning consent allowing a range of uses to include office/high tech, studio, laboratory and research & development. Currently most are engaged in light industry and the service sectors. Situated in the Oakhurst Business Park, the RSPCA headquarters employs 350 people. Christ's Hospital School and Foundation is the largest employer in the parish with just under 500 staff, with about 150 (mostly teaching staff) living on site.

#### Landscape Character & Ecology

4.9 The landscape itself has a gently changing topography forming low, raised areas and very shallow valleys. Expansive views are possible. The landscape presents these features as a harmonious whole with obvious change where it meets built up areas. There are localised small blocks of woodland, many of which are recorded as Ancient Woodland for example Pond Farm Ghyll, Courtlands Wood, Blunts Copse and Sparrow Copse. There extensive areas of informal green space and outside of the main settlement there are small hamlets and isolated farms, distinctive field trees and farm ponds and narrow lanes, sunken in places with farms and cottages dispersed along lanes<sup>8</sup>.

<sup>&</sup>lt;sup>6</sup> http://www.uklocalarea.com/index.php?q=Southwater&wc=45UFGY&lsoa=E01031682&property=y

<sup>&</sup>lt;sup>7</sup> Extracts from the Southwater Parish Design Statement 2011

<sup>&</sup>lt;sup>8</sup> Extracts from the Southwater Parish Design Statement 2011

4.10 Southwater falls within the Horsham District Landscape Capacity Assessment zone 2 which extends from the southern boundary of Horsham town and continues southwards to encompass the settlements of Tower Hill, Christ's Hospital and Southwater. The land falls within Low Weald National Landscape Character Area. The land includes the narrow river valley of the River Arun to the south of Horsham. In the west and south of the zone the landscape is well wooded, and includes a number of ridges and ghylls. The landscape also contains irregular to regular pasture fields. The north east of this landscape Zone is more open in nature with views to Christ's Hospital School. There are some urban influences in this area, particularly around the settlement edges and also from the A249. This zone is divided into a number of smaller local landscape character areas. A number of landscape character areas in the District (including between Horsham and Southwater) have an important role to play in maintaining a sense of separation between these settlements.

#### Flooding and Infrastructure

4.11 The Strategic Flood Risk Assessment (FRA) for Horsham District 2010 states that Southwater can suffer from pluvial flooding which typically arises when intense rainfall, often of short duration, is unable to soak into the ground and/or enter drainage systems. Pluvial flooding has been noted to have affected a large number of roads in Horsham including Southwater. However Southwater Parish falls within Flood Zone 1 – Low Probability flood risk.

## All means of Access and Transport<sup>10</sup>

4.12 Southwater has many advantages with good access to the motorway system giving direct road links to both Gatwick and Heathrow airports. Two railway stations, Horsham and Christ's Hospital are less than five miles away. There are currently six road routes into and out of the parish with the main route into the village of Southwater being the Worthing Road, which prior to December 1982 was the A24.

## Historic Character & Archaeology

4.13 The Parish of Southwater is privileged to have a number of listed historic buildings, timber-framed 13th to 16th century former open hall houses and 16th to 18th century chimney houses. Christ's Hospital is a charitable coeducational independent boarding school located to the north of the parish. The original buildings in the parish date from 1902 when the school relocated from Newgate Street onto the 1,200 acres site. Architectural features from the old school buildings (the Grecians' Arch, the Wren façade and statues) were salvaged and incorporated in the new buildings. The large houses in King Edward Road are built in Lutyens style with local brickwork detailing and high gables. The whole of the site is Grade 2\* listed.

 $<sup>^{9}\ \</sup>underline{\text{http://www.horshamdistrictldf.info/Core}}\ \underline{\text{Strategy/docs/Landscape-Capacity-Study2014.pdf}}$ 

<sup>&</sup>lt;sup>10</sup> Extracts from the Southwater Parish Design Statement 2011.

## The Sustainability Issues for Southwater

4.14 The sustainability issues are set out under the headings of economic, environmental and social and provided as a SWOT (**S**trength, **W**eaknesses, **O**pportunities, **T**hreats) table – see below.

#### **Strengths**

- A strong sense of community and active Parish Council.
- Village of Southwater set within a rural location.
- Good links to Horsham, Gatwick airport and the coast.
- Good footpath and bridleway links to open countryside
- Considered to be a safe village and Parish.
- A good number of heritage assets and historic locations such as Christ's Hospital and station, Denne Park House.
- Healthy population.
- Southwater Country Park is a popular and high quality area of public open space of value locally and wider afield.
- High quality village centre.

#### Weaknesses

- Limited opportunities for brownfield development or sites coming forward within built up area boundary.
- Access onto A24 is impacting on future growth of the village.
- No secondary school within Parish leading to out migration of school students each day.
- Over-reliance on the car for transport.
- Strategic allocation to west of Parish restricts other opportunities.
- Cost of housing is high.

#### **Opportunities**

- Improve provision and value of open space.
- Consider options for improving biodiversity within the village.
- Provide safe opportunities to walk and cycle.
- To seek delivery of key community and infrastructure improvements through strategic development to the west of the village.
- To allow Southwater to be developed sensitively to maintain gaps between settlements.

#### Threats

- Out commuting continues to grow.
- Strategic development earmarked for west of village.
- Strategic developments not identifying key infrastructure and community requirements.
- Lack of protection of buffer between Horsham and Southwater leading to coalescence of two locations.

## 5.0 **SUSTAINABILITY FRAMEWORK – OBJECTIVES**

- 5.1 In order to undertake the Sustainability Appraisal process, it is necessary to identify sustainability objectives and indicators (by which to measure these objectives) to enable an assessment to be made of the emerging options of the Neighbourhood Plan. The sustainability objectives and indicators combined are known as the Sustainability Framework.
- 5.2 The development of these objectives has taken into consideration the sustainability objectives of the Horsham District Planning Framework Sustainability Appraisal (May 2014) and issues identified within it.
- 5.3 The primary aim of the sustainability framework is to assess all realistic and relevant options for the Neighbourhood Plan in order to determine which option is the most sustainable, given alternatives. The sustainability indicators have also been developed to provide a mechanism to measure how the Neighbourhood Plan, once adopted, is contributing towards sustainable development. To establish the indicators a number of issues have been considered, particularly:
  - where information is currently available,
  - where the District Council has already set targets,
  - their relevance to planning matters and the influence the Southwater Neighbourhood Plan can have on achieving them.
- 5.4 The proposed sustainability objectives and associated indicators (framework) for the Sustainability Appraisal of the SPNP are set out below

SA Objective	Decision Making Criteria	Potential Indicators	Role
1. To provide high quality Housing in sustainable locations <sup>11</sup> to meet the needs of existing and future residents with an appropriate range of size, types and tenures	Q1a: Will the SPNP provide housing in sustainable locations?  Q2b: Will the SPNP provide a range of housing types, sizes and tenures in accordance with local need?  Q2a: Will the SPNP provide a housing to meet local need?	<ul> <li>Affordable housing completions.</li> <li>% of 1, 2,3 and 4+ bedroom homes built in proportion to the total</li> </ul>	Social

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<sup>&</sup>lt;sup>11</sup> Sustainable locations are considered to be sites that are either within the built up area of Southwater village or are adjacent to or abutting the existing built up area and relate to the village.

SA Objective	Decision Making Criteria	Potential Indicators	Role
2. To ensure everyone has access to appropriate, affordable community facilities including facilities for the elderly, education, childcare, leisure and recreation facilities and public open spaces.	Q2a: Will it increase the provision of community facilities and public open space?  Q2b: Will it ensure that community facilities and public open space are available and accessible to the whole community?	<ul> <li>Number of schemes resulting in improved or losses to community facilities, sport, recreation or open space.</li> <li>Total value of S106 / CIL contributions towards infrastructure, open space and community improvements</li> </ul>	Social
3. To create a sustainable community through the promotion of community engagement, the development of a sense of ownership and a sense of place and the provision of appropriate infrastructure. To create a safe, secure and healthy environment.	Q3a: Will it help provide appropriate infrastructure?  Q3b: Will it help deliver a 'sense of place' and community ownership?  Q3c: Will it help the community feel engages with the planning process?	Civic participation in the local area – number of respondents to future consultation exercises.	Social
4. To protect and enhance the quality and level of biodiversity; natural habitats; and, the best and most versatile agricultural land, within Southwater and where appropriate provide new green infrastructure.	Q4a: Will it protect and enhance existing flora, fauna and habitats including SSSIs, BAP woodland and other features of local biodiversity significance?  Q4b: Will it provide opportunities for new habitat creation and native species?  Q4c: Will it protect and enhance Grade 3A agricultural land (the best and most versatile agricultural land)?  Q4d: Will it provide additional green infrastructure for the community to enjoy?	<ul> <li>Number of schemes permitted with improvements to biodiversity, significant habitats, protected species, and areas of nature conservation.</li> <li>Area of land allocated for green infrastructure.</li> <li>Number of schemes permitted with improvements to Grade 3A agricultural land.</li> </ul>	Environmental

SA Objective	Decision Making Criteria	Potential Indicators	Role
5. To conserve and enhance the quality of landscape and character in Southwater and the quality and distinctiveness of the historical and cultural environment of the Parish.	Q5a: Will it conserve and enhance local landscape character?  Q5b: Will it conserve or enhance local heritage character?	<ul> <li>Number of landscape improvement schemes completed.</li> <li>Number of awards for the built environment.</li> <li>Number of applications incorporating heritage enhancements or improvement schemes.</li> </ul>	Environmental
6. To maintain flood risk; promote the use of sustainable drainage systems (SuDS); and, maintain or improve water quality.	Q6a: Will it not exacerbate any form of flooding?  Q6b: Will it provide opportunity to maintain or improve water quality?	<ul> <li>Permissions granted contrary to advice of EA &amp; WSCC.</li> <li>Number of developments that incorporate SuDS measures</li> </ul>	Environmental
7. To encourage sustainable design and construction through the promotion of exemplary sustainable design standards. To increase energy efficiency and the proportion of energy generated from renewable and low carbon sources. To maximise opportunities for the reduction, reuse and recycling of waste in Southwater/ Parish	Q7a: Will it include measures to increase energy efficiency and decrease waste?  Q7b: Will it improve design standards?	Number of developments using reclaimed material in construction	Environmental
8. To improve accessibility to and within the parish by ensuring the transport network can accommodate any future growth and by encouraging a range of sustainable transport options, including walking, cycling and public transport.	Q8a: Will it reduce petrol/diesel car use?  Q8b: Will it provide travel choice which includes sustainable modes of transport (ie public transport, walking and cycling)?	<ul> <li>Access to services and facilities by public transport, walking or cycling</li> <li>Number of bus stops.</li> <li>Number of applications accompanied by a Travel Plan</li> </ul>	Environmental

SA Objective	Decision Making Criteria	Potential Indicators	Role
9. To encourage vitality, vibrancy and overall stability within the local Southwater economy and to improve the availability of opportunities for local employment. To maintain and improve the local retail offer across the Parish including the town centre of Southwater.	Q9a: Will it support key sectors that drive economic growth?  Q9b: Will it support existing Southwater businesses?  Q9c: Will it support the diversity of the local economy?  Q9d: Will it support Lintot Square as the centre of Southwater Parish?	<ul> <li>Amount of employment land lost to residential development</li> <li>Amount of new employment floor space</li> <li>Amount of new retail floor space created</li> </ul>	Economic

## 6.0 CONSIDERATION OF MAIN ISSUES

6.1 This section discusses the main issues considered by the Steering Group and was used to establish the key approaches to be taken within the neighbourhood plan. It should be noted that this section only looks at the main issues considered as it would be superfluous to detail every decision made at a high level.

#### 1. Quantum of Housing?

- One of the main considerations for the neighbourhood plan is the provision of new homes within the parish, this is evident to some extent by the number of sustainability objectives set out in Section 4 of this document that relate to housing.
- 6.3 On 27 November 2015 Horsham District Council adopted the Horsham District Planning Framework (HDPF) as its development plan. The HDPF sets out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs for the district (outside the South Downs National Park).
- 6.4 The Neighbourhood Plan has a legal requirement to be 'in general conformity with the strategic policies contained in the development plan'. Whilst this does not mean absolute conformity the plan does need to adhere to the general overarching policy direction on key issues including, for example, the provision of new housing.
- The HDPF includes provision for 16,000 new homes over the plan period in Policy 15.

  1,500 of these homes are to be provided through allocations in Neighbourhood Plans in addition to strategic allocations. HDPF Policy 3 confirms that Southwater is a large parish in a relatively sustainable location and features in the second tier of the development hierarchy. An independent report has been prepared by AECOM to establish the appropriate share of the 1,500 homes (ref. Policy 15) that should come forward through this plan. It has confirmed that 420 to 460 dwellings should be provided through the N.Plan. Unless robust evidence can demonstrate that the land required to deliver this number of units is not suitable, available or achievable, failing to allocate land for this policy requirement would, most likely, result in the neighbourhood plan failing Basic Conditions and therefore not be able to be made.
- 6.6 It is therefore considered that the only viable reasonable alternative for the plan to adopt is to make provision for new housing within the neighbourhood plan, and this should be through allocations for a minimum of 420 dwellings.

## 2. Location of Housing?

When considering where housing should be located it was noted that the Neighbourhood Plan has a legal requirement to be 'in general conformity with the strategic policies contained in the development plan'.

- 6.8 The approach this plan can take with regard to the location of new housing is therefore constrained to some degree by HDPF Policy 4 which sets out the strategic approach for the growth of settlements in order to meet identified local housing, employment and community needs. Policy 4 confirms that;
  - "...outside built-up area boundaries, the expansion of settlements will be supported where, among other things,
  - 1. the site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge;
  - 2. The level of expansion is appropriate to the scale and function of the settlement type;
  - 3. The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services;
  - 4. The impact of the development individually or cumulatively does not prejudice comprehensive long term development, in order not to conflict with the development strategy; and
  - 5. The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.'

    [bold added for emphasis]
- 6.9 It is also apparent that the Neighbourhood Plan does not need to be in absolute conformity with the HDPF and has the ability to deviate, where justified, from policy set out in the HDPF. However, it was noted that a large number of sites have been submitted to the Steering Group for consideration and that a large number of these have the ability to deliver the quantum of development required.
- 6.10 In addition, it was noted that by seeking to allocate a site that does not adjoin an existing settlement would be considered to be a departure from the HDPF strategy and therefore arguably not in general conformity with the HDPF.
- 6.11 It was agreed that the Steering Group would focus their considerations on sites that abut existing settlements. However where a site is considered unsuitable for development solely because it does not abut the settlement boundary it will not be omitted from the SA/SEA process as this may remove options or alternatives from consideration at too early a stage. It was also noted that failure to meet criteria 1 of HDPF Policy 4 may be acceptable if the evidence were to advocate such an approach.
- 6.12 To summarise, the Steering Group chose to consider a wide range of locations for new housing whilst being mindful that HDPF Policy 4 requires allocations in neighbourhood plans to 'adjoin an existing settlement edge'.

#### 3. Allocate land for non-residential use?

- 6.13 Some consideration was given as to whether the neighbourhood plan should allocate land for non-residential uses, with the primary discussion being around the best way to promote economic growth and prosperity.
- 6.14 Two main options were considered. The first was to allocate land for commercial uses and the second looked at promoting economic development through the use of policies within the neighbourhood plan.
- 6.15 Having reviewed the sites submitted to the Steering Group for non-residential uses and considered the pro's and con's of each approach it was decided that land would not be allocated for non-residential development but that policies would be introduced through the plan to safeguard the local economy.

## 4. Housing for the elderly?

- 6.16 The Housing Needs Assessment prepared by AECOM was asked to consider current demographic and economic trends, and the current and future needs of the local population, to determine what types and sizes of C2 and C3 accommodation should be provided over the plan period. It confirmed that:
  - '127. As we have seen, this HNA identifies a housing needs figure for Southwater falling into a range of 420 and 460 dwellings to be delivered over the Plan period; on account of the rapidly aging population; we have also a need for 340 specialist dwellings suited to the needs of those aged 75+.
  - 128. Strictly speaking, these 340 dwellings will fall into a C2 Use Class; however, policy that requires a certain proportion of new build homes to conform with life-time homes principles (that will fall into a C3 Use Class category) will ease the pressure on demand for specialist housing of this kind, fulfilling a twin policy objective firstly that dwellings should be adaptable and, secondly, that of allowing older people to remain in their own homes, and more integrated into the community.
  - 129. It is important to state there is no obligation for the 340 dwellings all to be provided within the parish itself and it is highly unlikely, given the needs of older people to live close to essential services, that they will be so. Notwithstanding, any dwellings that are delivered may be included towards fulfilment of the parish housing needs figure. In reality, there will be some overlap between these dwellings and the target...'
- 6.17 The HNA went on to consider how the quantity of housing identified (a minimum of 422 units) should be split across between the C2/C3 uses. It states:
  - 218. As regards the spit in terms of C2 and C3 Use Classes, as we have seen in Table 6, the great majority of projected population growth at the district level is accounted for in older age groups. Taking these figures into account it is reasonable that the majority of new dwellings are suited to the use of people falling into these

groups; therefore, of the mid-range target of 430 dwellings to be delivered over the Plan period, we would recommend that that 340 are so designed. Half of these (170) falling into Use Class C3 with a requirement they confirm with Lifetime Homes principles. The balance should fall into C2 Use Class. The remainder, 90 dwellings may be assigned to general (C3) housing.

6.18 The Steering Group has considered the best way to address the matter of providing suitable homes for the elderly and a number of options were considered. These were:

## (a) Allow the market to deliver the required housing

6.19 It is clear that the market is not delivering the types of housing needed. The HNA identifies a clear unmet need for elderly care accommodation and it is therefore considered that a suitable planning policy intervention through the neighbourhood plan to ensure this situation is rectified is appropriate in the local parish context.

#### (b) Include detailed breakdown of house types/tenure/use class in any allocation

- 6.20 Horsham District Council have undertaken considerable work to set out what it considers to be an appropriate mix of new residential units and there is planning policy in place requiring this. HDC policy is linked to a study which is updated more often that the neighbourhood plan may be and as such is considered to be a better way of ensuring that an appropriate mix of new dwellings (size and tenure) is provided.
- 6.21 That said, it is clear that as the market and current policy interventions are not having the desired effect on the supply of new homes it may be appropriate to specify the breakdown per use class to be delivered (C2 / C3). Doing this is considered to be a sensible solution to ensure adequate provision of appropriate homes for the elderly and those in need of care.
  - (c) Include policies to stipulate % of new homes that should be C2 across the Parish.
- 6.22 Option (c) built upon the findings above and considered whether applying a blanket policy requiring a % of new homes to be C2 was appropriate. Concerns were raised as to whether this was appropriate, especially on smaller schemes where it would be impractical to provide C2 Residential Institutions as a % of say, 10 units. This option was therefore discounted.

## (d) Include broad policies to ensure new homes are fit for the elderly

- 6.23 The HNA has identified that a 'policy that requires a certain proportion of new build homes to conform with life-time homes principles (that will fall into a C3 Use Class category) will ease the pressure on demand for specialist housing'... falling into the C2 use class.
- 6.24 This was considered at length and some research undertaken into the costs on developments to achieve the lifetime home standard<sup>12</sup>. It was considered that the costs of

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<sup>&</sup>lt;sup>12</sup> See <a href="http://www.lifetimehomes.org.uk/pages/costs.html">http://www.lifetimehomes.org.uk/pages/costs.html</a>

achieving the lifetime home standard were minimal, and whilst there may be some implications for build costs a policy should be incorporated to require the lifetime home standard within the parish. However, given the current unmet need and ageing population the Steering Group saw no reason why all new properties should not be designed to ensure that they are fit for all ages.

- 6.25 To conclude on this issue, it was decided that a combination of options (b) and (c) be progressed in the neighbourhood plan. Namely:
  - The allocation should split the number of new homes to be delivered between C2 and C3 uses.
  - A broad policy should be introduced to ensure all new homes in the Parish meet the Lifetime Homes Standard.

## 5. Consideration of site allocations

6.26 This section considers the sites have been considered by the Steering Group and the groups of sites that form the reasonable alternatives to provide the objectively assessed housing need.

#### **Individual Site Assessments**

- 6.27 This section provides a brief review of the sites submitted to the Steering Group and assessed by against the Sustainability Objectives adopted in this document.
- 6.28 A mentioned above the sites have been assessed in detail by the Steering Group and their consultant and this assessment can be found in the neighbourhood plan's supporting Evidence Base which includes a map showing the location of each site.
- 6.29 Some sites have been screened out of this assessment. Sites that meet one of the below criteria have been screened out:
  - (i) Sites that are not developable (see site assessment report in evidence base)
  - (ii) Sites that have not been promoted for residential uses.
- 6.30 At this stage, we are not seeking to identify significant impacts, in SEA terms, but provide an overview of the likely impacts on the sustainability objectives. This exercise acts as a guide to assist the Steering Group with selection of their reasonable alternatives. The next section of this report includes the reasonable alternatives considered, the effects of each alternative and any mitigation that may be required.
- 6.31 The assessments set out below consider the impact of the site without considering any mitigation, beyond the normal requirements set out in planning policy or building control, which may be proposed.

6.32 The following symbols have been used to record the impact of each site against the objectives (if it were to come forward for the promoted use) with no mitigation against identified impacts:

+	Greater positive impact on the sustainability objective
?+	Possible positive or slight positive impact on the sustainability objective
/	No impact or neutral impact on the sustainability objective
?	Unknown impact
?-	Possible negative or slight negative impact on the sustainability objective
-	Greater negative impact on the sustainability objective

Site No.	1. Housing to meet the needs to today and tomorrow.	2. Access to appropriate, affordable community facilities	3. To create a safe, secure and healthy environment.	4. Protect/enhance biodiversity, and the best and most versatile agricultural land provide new green infrastructure.	<ol> <li>Conserve/enhance landscape, character, historical and cultural environment</li> </ol>	6. Flood risk, promote SuDS and improve water quality.	7. Sustainable design and construction. Increase energy efficiency and renewable energy.	8. Improve accessibility	9. Improve local job opportunities and local retail offer
1	Scoped c	out		,					
2	Scoped c	out							
3	Scoped c	out							
4a	Scoped c	out							
4b	+	+	?+	-	-	/	?	?+	?+
4c	Scoped c	out							
4d	+	+	?+	-	-	/	?	?+	?+
4e	Scoped c	out							
4f	+	+	?+	-	-	/	?	?+	?+
4g	Scoped c								
4h	Scoped c					T	_		
4i	+	?+	?+	-	-	/	?	?-	/
4j	+	?-	?+	-	-	/	?	?-	?-
4k	Scoped c								
41	Scoped c	out					_		
4m	+	+	?+	-	-	/	?	?+	?+
5	+	?-	?+	-	?-	/	?	?-	?-
6	+	?+	?+	?-	-	/	?	+	-
7	Scoped c								
8	+	?-	?+	-	?-	/	?	?+	/
9	Scoped c								
10	+	?-	?+	-	?-	/	?	?+	?+
11	Scoped c	out							

12	+	-	?+	?-	/	/	?	?-	?-
13	Scoped of	out							
14	Scoped of	out (comm	ercial dev	elopment	proposed	<i>(</i> )			
15	Scoped of	out							
16	+	-	?+	/	/	/	?	?-	?-
?	Scoped c	out							
18	Scoped of	out							

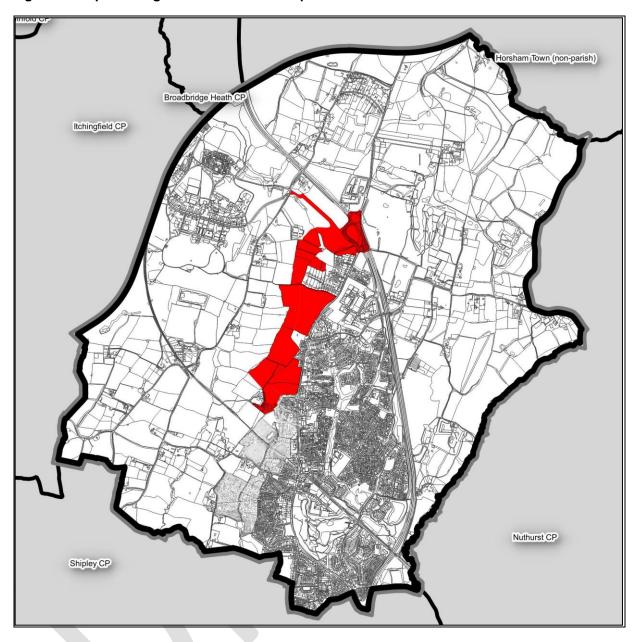
## Reasonable Alternatives / Options Considered

- 6.33 Using the initial assessments above, and local knowledge, a series of options were developed. Each option had a different combination of sites with the primary objective being to deliver a minimum of 420 new residential units.
- 6.34 The Steering Group were keen to consider a range of options available to them, this included considering more than 420 homes if that had the potential to deliver the infrastructure considered to be needed within the parish.
- 6.35 Each of the options considered are set out below:

## Option 1 – Large Northwest Expansion of Southwater

- 6.36 This option would see the expansion of the main settlement of Southwater into the farmland to the west. This land has very few environmental constraints and is readily developable. The scope of development would, it is envisaged, enable land to be made available for a new school and the provision of accommodation for the elderly. The extent of the area being considered is shown in Figure 1.
- 6.37 To make this amount of development acceptable in highway terms it was considered that the Hop Oast roundabout would likely need reconfiguring, this would also allow a much improved access to be provided to Christs Hospital School removing the existing traffic from the Tower Hill area. Residential development, associated open space and any required community facilities would be provided in a north/south band with the new access road providing a hard boundary between the new development and the countryside beyond.
- 6.38 This option was considered to have the potential to include:
  - Between 600 and 1200 residential dwellings and required community facilities
  - C2 accommodation for the elderly (around 60 bed care home and 60 extra care units) in pleasant grounds.
  - New combined primary and secondary school / academy
  - Highway improvements as required (likely to be further improvements to Hop Oast Roundabout and possible new access to Christs Hospital School).

Figure 1 - Map showing extent of allocation Option 1



**Option 1 Assessment & Summary** 

Option No.	<ol> <li>Housing to meet the needs to today and tomorrow.</li> </ol>	2. Access to appropriate, affordable community facilities	3. To create a safe, secure and healthy environment.	4. Protect/enhance biodiversity, and the best and most versatile agricultural land provide new green infrastructure.	<ol> <li>Conserve/enhance landscape, character, historical and cultural environment</li> </ol>	6. Flood risk, promote SuDS and improve water quality.	7. Sustainable design and construction. Increase energy efficiency and renewable energy.	8. Improve accessibility	9. Improve local job opportunities and local retail offer
1	+	?+	?+	-	?-	1	?	?+	?

- 6.39 This was considered to have a number of benefits, partly as the new development would be adjacent to the existing settlement. A possible new road to Christs Hospital would improve traffic conditions at Towner Hill whilst also providing much better access to the railway station for new and existing residents of Southwater. Also, the Hop Oast roundabout improvements would provide a wider benefit to the highway network and reduce pressure on it. It is likely that C2 accommodation can be provided within the development close to existing facilities and services.
- 6.40 However, development would occur in the countryside outside the existing settlement boundary which would have a significant impact on the landscape. Some development to the north would not be well related to existing services and facilities in Southwater. It is also noted that it would require some land to be utilised that is considered to currently be 'Not Developable'. However, it is considered that should a comprehensive development be proposed across the area shown in Option 1, the assessments (see Site 4J & 4K in the Site Assessment Document) would likely give rise to different results.
- 6.41 Overall, it is considered that this option would likely have a significant impact on the landscape in this part of the Parish. Aside from this, if planned well it would be unlikely to give rise to other unacceptable environmental impacts (subject to the outcome of the HRA).

## **Option 2 - Dispersed Residential Development**

- 6.42 This option would see residential development occur across the parish to ensure any negative impacts are spread and not concentrated on any one part of the community. It would see around 500 residential units with up to 150 units on the site north of Christs Hospital School, 250 immediately west of Worthing Road and a further 100 come forward on land south of the current strategic allocation as shown in Figure 2. Some of these units could be C2 Use Class.
- 6.43 It is noted that the site adjacent to Christs Hospital is considered to be 'Not Developable' in isolation but it was considered important to test its inclusion within an option for the plan to see if when considered cumulatively or in combination assessment results would vary. With the exception of the Christ's Hospital Site, the sites are relatively well contained with no significant likely environmental impacts.
- 6.44 It was noted by the Steering Group in their assessments that by bringing forward smaller sites, new facilities that may be of wider benefit such as a new school or access roads may be harder to secure as each scheme in isolation may not be able to provide the required infrastructure in a viable way.

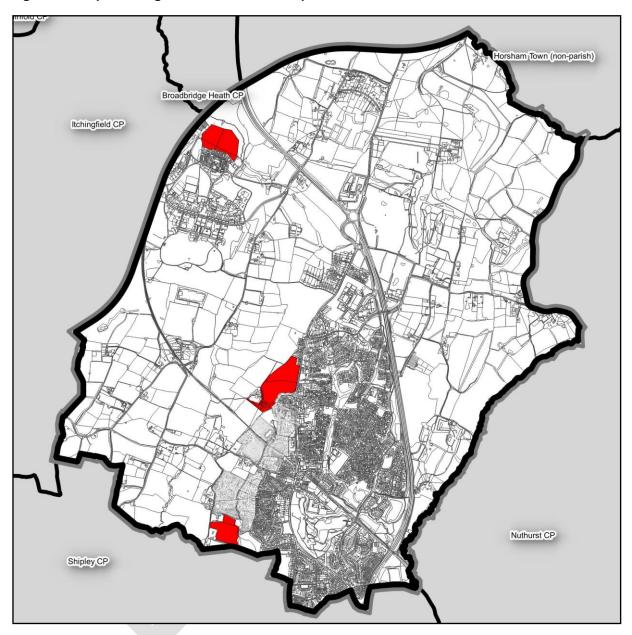
**Option 2 Assessment & Summary** 

2	Option No.
?+	<ol> <li>Housing to meet the needs to today and tomorrow.</li> </ol>
?-	2. Access to appropriate, affordable community facilities
?-	3. To create a safe, secure and healthy environment.
-	4. Protect/enhance biodiversity, and the best and most versatile agricultural land provide new green infrastructure.
?-	<ol> <li>Conserve/enhance landscape, character, historical and cultural environment</li> </ol>
/	6. Flood risk, promote SuDS and improve water quality.
?	7. Sustainable design and construction. Increase energy efficiency and renewable energy.
+	8. Improve accessibility
?-	<ol> <li>Improve local job opportunities and local retail offer</li> </ol>

- 6.45 Overall this option would have minimal effects on the landscape with the impact of development spread across the two settlements of Christs Hospital and Southwater. The bulk of development would be close to the services and facilities in Southwater which was considered to be positive although the new properties at Southwater would have limited if any services and facilities within walking distance. The site at Christs Hospital would however provide additional car parking at Christs Hospital station.
- 6.46 However, it was considered that development in the areas proposed could make highway / traffic situation in Southwater village and Tower Hill Area worse. Particularly the latter where the additional traffic would be put onto the existing narrow Two Mile Ash Road.

6.47 In addition the expansion of Christs Hospital may not be in general conformity with the HDPF as it features lower on the settlement hierarchy that Southwater and therefore expansion of this settlement may not be in accordance with the HDPF.

Figure 2 – Map showing extent of allocation Option 2



# **Option 3 - Tower Hill Expansion**

- 6.48 The Steering Group considered that one option should explore an option which involved the expansion of the Tower Hill Settlement. It is noted that Sites 1 and 2 from the Site Assessment Document are considered to be 'Not Developable'. This option would therefore be contrary to these assessments but in the context of seeking to find the most sustainable development strategy for the parish it was considered that it should be investigated.
- 6.49 However, that the sites identified in this option around Tower Hill do not have the capacity to provide for the OAN and so some development in/around Southwater would be required. Sites 12 and 10 have been included in order to deliver the OAN.
- 6.50 Overall this option has the potential to deliver around 460 homes, of which around 150 would be C2 Use Class just south of Towner Hill.

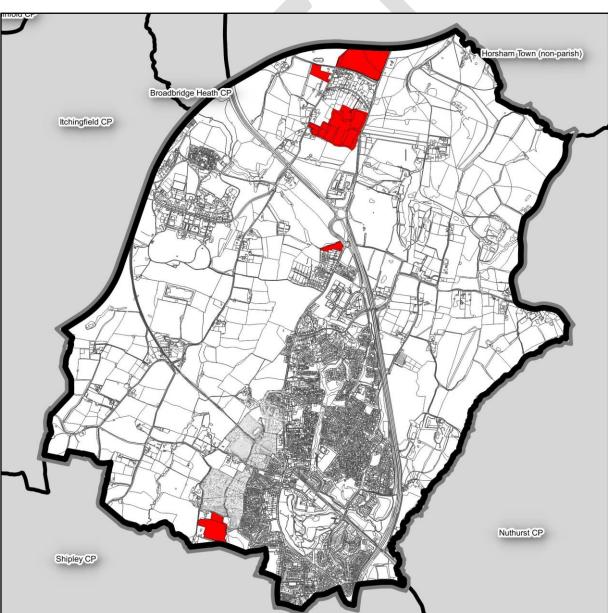


Figure 3 - Map showing extent of allocation Option 3

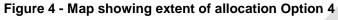
## **Option 3 Assessment & Summary**

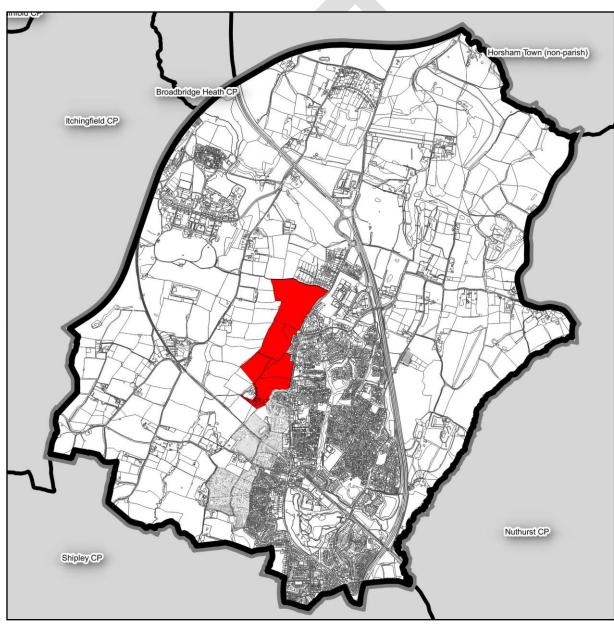
3	Option No.
?-	<ol> <li>Housing to meet the needs to today and tomorrow.</li> </ol>
?+	<ol> <li>Access to appropriate, affordable community facilities</li> </ol>
?-	3. To create a safe, secure and healthy environment.
-	4. Protect/enhance biodiversity, and the best and most versatile agricultural land provide new green infrastructure.
-	<ol> <li>Conserve/enhance landscape, character, historical and cultural environment</li> </ol>
1	<ol> <li>Flood risk, promote SuDS and improve water quality.</li> </ol>
?	7. Sustainable design and construction. Increase energy efficiency and renewable energy.
?-	8. Improve accessibility
?-	9. Improve local job opportunities and local retail offer

- 6.51 This option would provide concentrated development in the Tower Hill area which is considered would result in new development more closely linked with Horsham than Southwater. Indeed there would be good vehicular and pedestrian links into Horsham Town. As a result this scenario would lead to the least pressure on facilities and services of Southwater (when compared with other options). However it would result in increased traffic on the Worthing Road in this location and Tower Hill / Two Mill Ash Road which, when combined with traffic for Christs Hospital may result in unacceptable highway impacts.
- 6.52 This option is also considered to be contrary to the HDPF policies with particular reference to the settlement hierarchy approach. The sites are in the Countryside and beyond the existing hard boundary the railway provides for Horsham. The poor highway infrastructure around Tower Hill is also considered problematic. Finally it is considered that there would be likely significant harm to the landscape in the northern part of the parish. The sites around Southwater are less problematic.

# **Option 4 - Western Expansion of Southwater**

- 6.53 This option would see the expansion of the main settlement of Southwater into the farmland to the west. This land has few environmental constraints and is readily developable. The land in question has the capacity to deliver between 420 and 800 residential units dependant on densities. The scope of development may enable the provision of community facilities but would likely create unacceptable highway impacts unless substantial mitigation is proposed.
- 6.54 The option would provide residential development, associated open space and some community facilities possibly including land for a school although this would reduce the number of residential units that could be delivered.





## **Option 4 Assessment & Summary**

4	Option No.
+	<ol> <li>Housing to meet the needs to today and tomorrow.</li> </ol>
+	<ol> <li>Access to appropriate, affordable community facilities</li> </ol>
?+	3. To create a safe, secure and healthy environment.
-	4. Protect/enhance biodiversity, and the best and most versatile agricultural land provide new green infrastructure.
?-	5. Conserve/enhance landscape, character, historical and cultural environment
1	<ol><li>Flood risk, promote SuDS and improve water quality.</li></ol>
?	7. Sustainable design and construction. Increase energy efficiency and renewable energy.
?+	8. Improve accessibility
?+	9. Improve local job opportunities and local retail offer

- 6.55 By grouping all development into one location new large scale development would be contained in one area and not 'spread' across the parish. This was considered to have some benefits as any impacts could be more readily mitigated against. A larger development on land such as this with few costs to development is also likely to result in a more viable development. This, it is hoped would then mean it can be policy compliant with regards to affordable housing and other policy requirements..
- 6.56 This part of the parish has also been identified as the area with landscape capacity for new development (see Southwater Landscape Sensitivity & Capacity Study in the evidence base).
- 6.57 However, the principle potential negative impact would be on the Worthing Road (north and south) with vehicular movements to/from the A24. The option would also not resolve the issue surrounding poor vehicular links with railway station at Christs Hospital. It would also result in a large number of properties being built a fair way from the existing settlement Centre of Lintot Square, beyond walking distance for some.

# Option 5 - Alternative Western Expansion of Southwater

- 6.58 As per Option 4, this option would see the expansion of the main settlement of Southwater into the farmland to the west. This land has few environmental constraints and is readily developable. The scope of development may enable the provision of community facilities but would likely create unacceptable highway impacts.
- 6.59 The scheme would provide residential development, associated open space and have the potential to deliver some community facilities but would give rise to additional pressures on education and the local highway network.
- 6.60 The land chosen to help deliver this option ensures that all new homes would be within 15 minute walking distance of Lintot Square which has been chosen as a preferred strategy by the Steering Group.

Horsham Town (non-parish) Itchingfield CP Nuthurst CP Shipley CP

Figure 5 - Map showing extent of allocation Option 5

#### **Option 5 Assessment & Summary**

1. Housing to today and tom today and tom community factormunity factors factormunity factormunity factormunity factormunity factormunity factormunity factors factormunity factormunity factors factor facto	Option No.
7 8 8 4 4 4 8 8 9 9 9 9 8 9 8 9 9 9 9 9 9	<ol> <li>Housing to meet the needs to today and tomorrow.</li> </ol>
ස ද සු දු ද ද ද ද ද ද ද ද ද ද ද ද ද ද ද	<ol> <li>Access to appropriate, affordable community facilities</li> </ol>
aggraph de la	<ol> <li>To create a safe, secure and healthy environment.</li> </ol>
	4. Protect/enhance biodiversity, and the best and most versatile agricultural land provide new green infrastructure.
	<ol> <li>Conserve/enhance landscape, character, historical and cultural environment</li> </ol>
	6. Flood risk, promote SuDS and improve water quality.
+ 8. Improve ac	<ol> <li>Sustainable design and construction. Increase energy efficiency and renewable energy.</li> </ol>
	8. Improve accessibility
9. Improve loce and local retail	9. Improve local job opportunities and local retail offer

- 6.61 By grouping all development into one location new large scale development would be contained in one area and not 'spread' across the parish. This was considered to have some benefits as any impacts could be more readily mitigated against. A larger development on land such as this with few costs to development is also likely to result in a more viable development. This, it is hoped would then mean it can be policy compliant with regards to affordable housing and other policy requirements..
- 6.62 This part of the parish has also been identified as the area with landscape capacity for new development (see Southwater Landscape Sensitivity & Capacity Study in the evidence base).
- 6.63 This option does have the potential to negatively impact a Grade II\* Listed Building but it is considered through careful design these harms can be mitigated and minimised to an extent that they would be considered acceptable.
- 6.64 However, the principle potential negative impact would be on the Worthing Road (north and south) with vehicular movements to/from the A24. The option would also not resolve the issue surrounding poor vehicular links with railway station at Christs Hospital. That said it abuts the Downs Link and there would be potential for this to be improved so that a direct cycle route to the station can be provided.
- 6.65 This option offers an improvement on Option 4 as it would ensure that all new homes are within 15 minute walking distance of Lintot Square ensuring the local economy is supported by the new development.

# **Summary of Options Assessed**

6.66 The assessments of the reasonable alternatives considered through the SA/SEA process are set out below to allow easy comparison of them.

Option No.	<ol> <li>Housing to meet the needs to today and tomorrow.</li> </ol>	2. Access to appropriate, affordable community facilities	3. To create a safe, secure and healthy environment.	4. Protect/enhance biodiversity, and the best and most versatile agricultural land provide new green infrastructure.	<ol> <li>Conserve/enhance landscape, character, historical and cultural environment</li> </ol>	6. Flood risk, promote SuDS and improve water quality.	<ol> <li>Sustainable design and construction. Increase energy efficiency and renewable energy.</li> </ol>	8. Improve accessibility	9. Improve local job opportunities and
1	+	?+	?+	-	?-	/	?	?+	?
2	?+	?-	?-	-	?-	/	?	+	?-
3	?-	?+	?-	-	-	/	?	?-	?-
4	+	+	?+	-	?-	1	?	?+	?+
5	+	+	+	-	?-	1	?	+	+

- 6.67 All of the options considered are on undeveloped land and, whilst mitigation would be proposed to minimise harms, would have a negative impact on Objective 4. In addition, impacts on Objective 6 would be negligible as national planning policy requires the existing run-off rates to be maintained post development.
- 6.68 With regard to Objective 7, this is largely down to the developer that brings the site forward, at this time we have not received sufficient information that would allow us to make an assessment on this objective so have reported an unknown impact on each alternative
- 6.69 Assessments have been undertaken with regards to the other objectives and it is clear from the assessment undertaken that overall Option 5 has the most positive impact against the sustainability objectives. This option has therefore been progresses and included within the draft neighbourhood plan.

#### 7.0 CONSIDERATION OF EFFECTS

7.1 This section considers the likely effects of the Reg.14 Draft Neighbourhood Plan.

#### **Assessment of plan policies**

- 7.2 Each of the Reg.14 Draft Neighbourhood Plan have been assessed to determine their likely effect on the Sustainability Objectives. It has then been considered whether any mitigation is required in order to reduce the identified effect.
- 7.3 The following symbols have been used to record the assessed effect of each policy against each objectives:

+	Greater positive impact on the sustainability objective
?+	Possible positive or slight positive impact on the sustainability objective
/	No impact or neutral impact on the sustainability objective
?	Unknown impact
?-	Possible negative or slight negative impact on the sustainability objective
-	Greater negative impact on the sustainability objective

7.4 The tables below consider each of the proposed policies in turn alongside their initial assessment, a commentary and a final assessment of effects which takes account of any mitigation that has been incorporated into the plan.

SNP1 – Southwater's Core Principles

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		The core principles were established by the	+
2		Steering Group, no negative effects were identified or mitigation proposed.	?+
3		administration propossus	+
4			?+
5	n/a		?+
6			?+
7			/
8			?+
9			?+

#### SNP2 – Allocation for Residential Development

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1	?+	To ensure the correct type of housing is	+
2	?+	delivered C2/C3 split should be specified.  Negative impact on biodiversity and	+
3	+	landscape can should be mitigated to some	+

4	-	extent by ensuring existing trees and hedges	-
5	-	are retained – policy requirement added, however this does not affect the assessment	?-
6	/	with regards to Obj.4. Alongside good design, a minimum 100m buffer around the	/
7	?	Grade II* Listed Great House Farmhouse will	?
8	+	go some way to preserving its setting (Obj.5) Pressure on schools needs to be addressed	+
9	+	<ul> <li>avoid effect by safeguarding land for new school (see policy 3).</li> </ul>	+

# SNP3 – Safeguarding of Land for Secondary School

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		This policy introduced to mitigate effects of	/
2		allocation and general existing pressure on education system. No mitigation required.	?+
3		oadoanon oyotonii 110 miliganon 104anoa.	?+
4			?-
5	n/a		?-
6			/
7			?
8			?+
9			?+

# SNP4 - Keeping Our Roads Moving

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		This policy introduced to mitigate effects of	/
2		allocation and general existing pressure on transport system. No mitigation required.	?+
3		and point of other interest of the second of	+
4			?-
5	n/a		?
6			/
7			/
8			+
9			?+

### SNP5 - Local Green Space

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Positive effects on provision affordable	/
2		facilities and protection of the natural environment. No mitigation required.	+
3		and the second s	+
4			+
5	n/a		+
6			/
7			/
8			/
9			/

#### SNP6 - Local Community Space

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Positive effects on provision affordable facilities and protection of the natural environment. No mitigation required.	/
2			+
3			+
4	n/a		+
5			+
6			/
7			/
8			/
9			/

# SNP7 - Formal/Informal Sports Areas

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Positive effects on provision of facilities. No	/
2		mitigation required.	+
3			+
4	n/a		/
5			/
6			/
7			/

8		/
9		/

### SNP8 - Southwater Country Park

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1	/	Original policy sought to protect the Country	/
2	/	Park from all forms of development but this may reduce opportunity to provide facilities	+
3	+	in this area in the future. The policy was	+
4	+	amended to support the provision of new appropriate facilities. It is accepted this now	?-
5	+	has the potential to negatively affect biodiversity and the natural environment but the Steering Group considered this an	+
6	/		/
7	/	appropriate weigh-off.	/
8	/		/
9	/		/

### SNP9 – Lifetime Home Standards

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Positive effects on providing high quality	+
2		housing that meets the needs of existing and future generations. No mitigation required	/
3		Tataro gonorationo. No miligation required	/
4			/
5	n/a		/
6			/
7			/
8			/
9			/

#### SNP10 - Residential Space Standards

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1	n/o		+
2	n/a		/

3		/
4		/
5		/
6		/
7		/
8	Positive effects on providing high quality housing that meets the needs of existing and	/
9	future generations. No mitigation required	/

# SNP11 – Specialist Accommodation & Care

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Positive effects on providing housing that meets the needs of existing and future generations. No mitigation required	+
2			+
3	n/a		/
4			) /
5			/
6			/
7			/
8			/
9			/

# SNP12 - Outdoor Play Space

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Positive effects on providing housing and	/
2		facilities that meets the needs of existing and future generations. No mitigation required	+
3			+
4			/
5	n/a		/
6			/
7			/
8			/
9			/

SNP13 - Growing Our Cycling & Walking Network

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Positive effects on improving accessibility	/
2		within the parish. No mitigation required	?+
3			?+
4			/
5	n/a		/
6			/
7			/
8			+
9			/

SNP14 – Adequate Provision of Car Parking

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1	/	This policy came about in response to an	?+
2		abundance of on-street car parking in certain parts of the parish. However, possible	/
3	?+	negative impacts were identified with regard	?+
4	/	to encouraging sustainable transportation options. Mitigation proposed to support the	/
5	1	update of electric vehicles (see SNP15). This	/
6	1	mitigation is also considered to improve this policies assessment against Objective 1.	/
7	1	January against agains	/
8	?-		?+
9	/		/

SNP15 – Driving in the 21st Century

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Policy will result in the increased uptake of	?+
2		electric vehicles. No mitigation required.	/
3			?+
4			/
5	n/a		/
6			/
7			/
8			+
9			/

### SNP16 - Design

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Policy aimed at improving the design of developments. No harmful effects identified or mitigation required.	+
2	n/a		/
3			/
4			/
5			/
6			/
7			+
8			/
9			/

### SNP17 - Site Levels

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Policy to provide local guidance on site	+
2		levels in developments. No negative effects or mitigation required.	/
3		or maganor roquirous	/
4			/
5	n/a		?+
6			?+
7			?+
8			/
9			/

#### SNP18 - A Treed Landscape

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Policy provides positive effects on a range of objectives. No mitigation required.	/
2			?+
3			+
4			+
5	n/a		?+
6			?+
7			?+
8			/
9			?-

### SNP19 - Parish Heritage Assets

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Policy provides positive effects with regards	/
2	70/0	to culture and heritage. No mitigation required.	/
3		i oquilou.	?+
4	n/a		/
5			+
6			/

7		/
8		/
9		/

# SNP20 - Retention of Assets of Community Value

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Policy provides positive effects with regards	/
2		to the provision of appropriate facilities. No mitigation required.	+
3		ga.ion roquiroa.	+
4			/
5	n/a		?+
6			/
7			/
8			/
9			/

# SNP21 – A Growing Economy

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1	1	Policy proposed to support the local	/
2	1	economy. Possible negative impact identified with regards to the highway network and	/
3	+	accessibility. Policy requirement added to	+
4	/	ensure no unacceptable impacts on highway network resulting from Key / Parish	/
5	1	Employment Areas.	/
6	1		/
7	1		/
8	-?		?+
9	+		+

### SNP22 - Telecommunications

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment		
1		Policy provides support for	+		
2		telecommunication infrastructure which will have positive effects with regards to housing and commercial areas. Will also have positive impacts with regards to sustainable transportation.	telecommunication infrastructure which will have positive effects with regards to housing		
3			/		
4			/		
5	n/a		/		
6			/		
7			/		
8			?+		
9			+		

# SNP23 - Use of Community Infrastructure Levy Funds

SA/SEA Objective	Original Assessment	Commentary / Mitigation required?	Final Assessment
1		Policy to guide the use of CIL funds towards	/
2	n/a	infrastructure required within the parish. No mitigation required.	+
3			+
4			+
5			?+
6			?+
7			?+
8			?+
9			?+

### **Total Effects**

- 7.5 Total effects are all of the plan's effects.
- 7.6 The table below illustrates the effects of the plan's policies once measures have been taken to mitigate initially perceived harmful effects (set out above).

Policy No.	<ol> <li>Housing to meet the needs to today and tomorrow.</li> </ol>	2. Access to appropriate, affordable community facilities	3. To create a safe, secure and healthy environment.	<ol> <li>Protect/enhance biodiversity, and the best and most versatile agricultural land provide new green infrastructure.</li> </ol>	5. Conserve/enhance landscape, character, historical and cultural environment	6. Flood risk, promote SuDS and improve water quality.	7. Sustainable design and construction. Increase energy efficiency and renewable energy.	8. Improve accessibility	<ol> <li>Improve local job opportunities and local retail offer</li> </ol>
1	+	?+	+	?+	?+	?+	/	?+	?+
2	+	+	+	-	?-	1	?	+	+
3	/	?+	?+	?-	?-	/	?	?+	?+
4	/	?+	+	?-	?	/	/	+	?+
5	/	+	+	+	+	/	/	/	/
6	/	+	+	+	+	/	/	/	/
7	/	+	+	1	1	/	/	/	/
8	/	+	+	?-	+	1	/	/	/
9	+	1	1	/	/	/	/	/	/
10	+	1		/		/	/	/	/
11	+	+	1	/	1	/	/		/
12	1	+	+	/	/	/	/	/	/
13	/	?+	?+	/	/	/	/	+	/
14	?+ ?+	/	?+ ?+	1	/	/	/	?+	/
15		/		/	/	/	/	+	/
16 17	+	/	/	/	?+	?+	+ ?+	/	/
18	<b>+</b> /	?+	+	+	?+	?+	?+	/	?-
19	/	/	?+	/	+	/	/	/	/
20	/	+	+	/	?+	/	/	/	/
21	/	?+	+	/	/	/	/	?+	+
22	+	/	/	/	/	/	/	?+	+
23	/	+	+	+	?+	?+	?+	?+	?+

7.7 The total effect of the plan's policies have then been considered and these are set out in the table below.

	Tatal	Etter)
1. To provide high quality Housing in sustainable locations <sup>13</sup> to meet the needs of existing and future residents with an appropriate range of size, types and tenures	+	The draft plan provides high quality housing fit for an ageing population (secured by the SNP1, SNP9, SNP10 and SNP11) and ensures that enough housing will come forwards to meet the identified need (SNP2). It is accepted that the plan will have little effect on the size, type or tenure of new dwellings as policies set out Horsham District Council are being relied upon in this regard.
2. To ensure everyone has access to appropriate, affordable community facilities including facilities for the elderly, education, childcare, leisure and recreation facilities and public open spaces.	+	The draft plan includes a number of measures to secure access to community facilities for the whole community.
3. To create a sustainable community through the promotion of community engagement, the development of a sense of ownership and a sense of place and the provision of appropriate infrastructure. To create a safe, secure and healthy environment.	+	The draft plan will have a significant positive effect on this objective. By ensuring development is centred on Lintot Square a sense of place will be reinforced. Policies also seek to deliver the required infrastructure to support growth and facilities.
4. To protect and enhance the quality and level of biodiversity; natural habitats; and, the best and most versatile agricultural land, within Southwater and where appropriate provide new green infrastructure.	/	Whilst the proposed allocation will provide considerable open space it will result in the loss of green field land and therefore have a harmful impact on this objective. However other policies are included which will have positive impacts on biodiversity and green infrastructure Overall it is considered that there will be a neutral impact on this objective.
5. To conserve and enhance the quality of landscape and character in Southwater and the quality and distinctiveness of the historical and cultural environment of the Parish.	?+	Again the allocation will have some negative effects on this objective but when considered as a whole the total effect is considered to be slightly positive. The plan's approach seeks to reinforce Southwater as the principle settlement preserving the surrounding landscape and character of it. Policies to protect local heritage are also included.
6. To maintain flood risk; promote the use of sustainable drainage systems (SuDS); and, maintain or improve water quality.	?+	The plan will have few effects on this objective as matters relating to flood risk are generally considered at the District or National level.  Overall however it is considered that there will be slight positive effect.
7. To encourage sustainable design and construction through the promotion of exemplary sustainable design standards. To increase energy efficiency and the proportion of energy generated from renewable and low carbon sources. To maximise opportunities for the reduction, reuse and recycling of waste in Southwater/ Parish	+	The total effect of the draft plan on this objective will be positive although limited actions could be taken within the plan document to reduce waste as this is generally outside of the planning systems control.

 $^{13}$  Sustainable locations are considered to be sites that are either within the built up area of Southwater village or are adjacent to or abutting the existing built up area and relate to the village.

SA Objective	Total Effect		
8. To improve accessibility to and within the parish by ensuring the transport network can accommodate any future growth and by encouraging a range of sustainable transport options, including walking, cycling and public transport.	that developmed infrastructure uplace on the system incorporate cycle routes. Duthe allocated descriptions of the allocated descriptions of the system of th	des a range of measures to ensure ent provides adequate transport up-front for the pressure it will ystem. In addition policies have ated to improve out pedestrian and despite the pressure resulting from levelopment site the plan will have effect on this objective.	
9. To encourage vitality, vibrancy and overall stability within the local Southwater economy and to improve the availability of opportunities for local employment. To maintain and improve the local retail offer across the Parish including the town centre of Southwater.	whilst providing uses to come for concentrate the Lintot Square. to sustain local Telecommunic central to perset this plan also s	protects parish employment areas g opportunity for new commercial forward. It also seeks to e provision of services in/around Doing so will it is considered help offer and the local economy. Fations is increasingly becoming onal and business activities and seeks to support the rollout of next-hnology within the parish.	

7.8 It is considered that none of the negative effects outlined above would be significant. The Total effect of the plan is considered to be overwhelmingly positive.

#### **Cross-Border Effects**

- 7.9 The plan rise to very few cross-border effects. As illustrated in the 'Assessment of plan policies' the policies are generally parish specific and will not result in effects on the wider area.
- 7.10 The exception to this being the allocation of land for a minimum of 422 new homes. This is likely to give rise to additional pressure on the highway network and existing infrastructure and facilities (such as schools).
- 7.11 However, this plan has sought to ensure that cross-border effects are minimised by requiring that required highway infrastructure is provided, land is safeguarded for a new school and accessibility to Christs Hospital Railway Station is improved.
- 7.12 It is considered that cross-border effects will be minimal, and not likely to be significant.

#### **Cumulative effects**

- 7.13 There are a number of cumulative impacts that should be considered as well. These are the effects of the plan plus other actions not influenced or controlled by the plan. There are a number of cumulative impacts that we would highlight:
- 7.14 Neighbouring Parish Councils are preparing their own Neighbourhood Plans which, it is expected will allocate development sites in their respective areas.

- 7.15 To the east, Nuthurst Parish have an adopted plan and no cumulative impacts are forseen. To the west Itchingfield and Barns Green are currently preparing a plan, their latest published position is that they have identified 2 sites Site 19 (Sumner's Ponds) & Site 7 (Itchingfield Old School) as preferred sites to include when drafting the Neighbourhood Plan. Should these sites come forward it is not considered that they would give rise to any significant effects.
- 7.16 There are several planning applications currently in the planning system. Most notably DC/18/0944 for 90 new homes to the north of the parish (decision was due on Fri 03 Aug 2018) and DC/17/2195 for 15 dwellings on the northern boundary of Southwater Village which has been refused and currently at appeal. However it is not considered that these developments alongside the plan (should they be approved) would give rise to any likely significant effects.
- 7.17 The effects of the resident (and non-resident) population's behaviour alongside the neighbourhood plan should also be considered. Any effects are hard to identify or foresee but effects could include increased travel to access recreational spaces, these could include protected sites which may result in harmful impacts on them. However, it is considered that this is unlikely given the amenity space within the parish and the policies being introduced to protect our open spaces.

#### In-Combination (or Synergistic) effects

7.18 Having reviewed the effects that have been identified it is considered that there would be, following the mitigation outlined, no synergistic effects that would give rise to significant negative effects.