

Fernhurst Neighbourhood Plan

Sustainability Appraisal



January 2014

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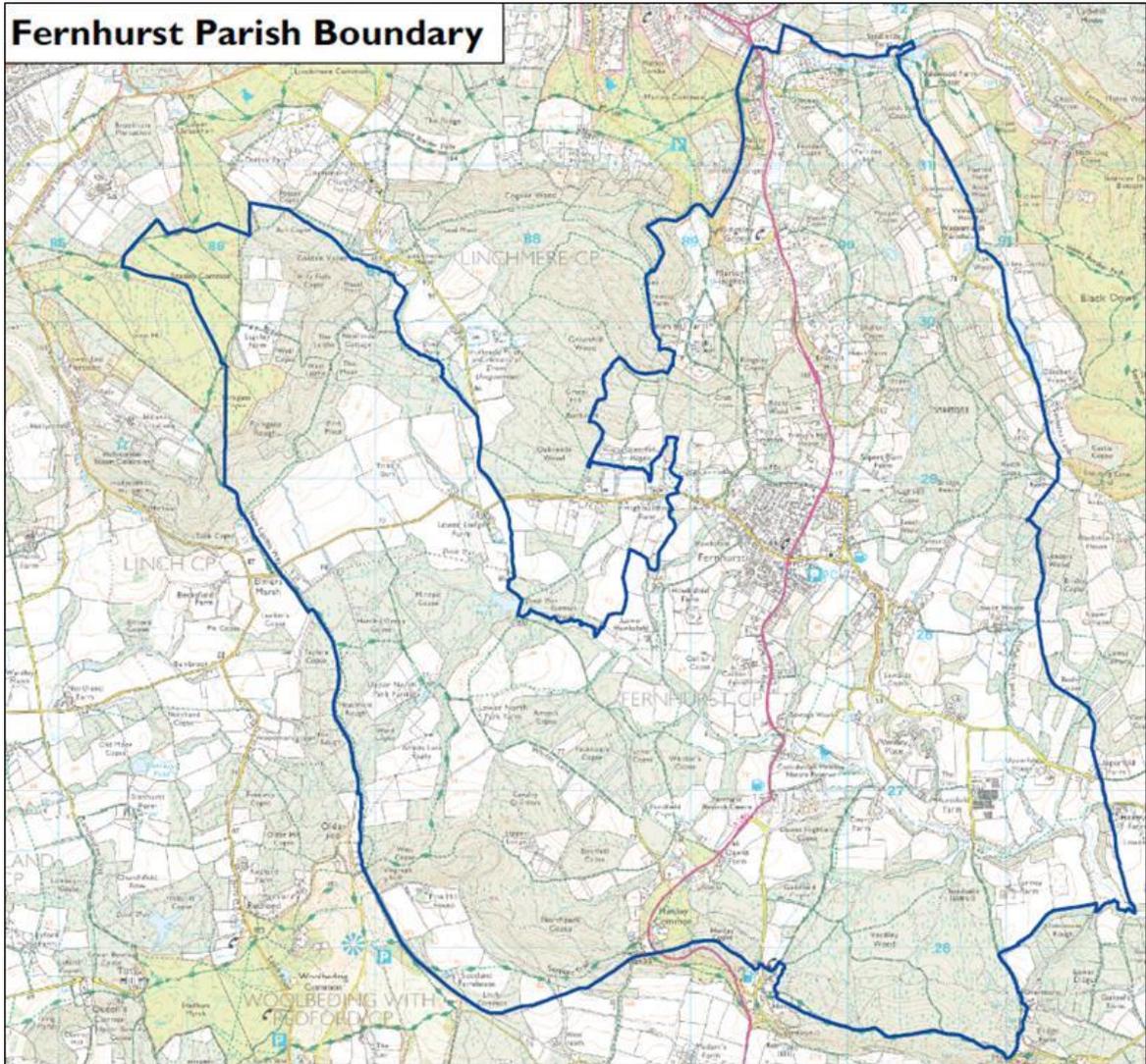
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1 INTRODUCTION

- 1.1 This report represents the Sustainability Appraisal (SA) for the Fernhurst Neighbourhood Plan and in accordance with Strategic Environmental Assessment (SEA) Regulations and SA Guidance, incorporates SEA criteria as part of the wider SA process, which aims to fulfil the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2 The sustainability appraisal process is designed to ensure that the principles of sustainable development are incorporated into planning policy at all levels. Sustainability appraisal is a requirement of the EC Directive 2001/42/EC on the assessment of the impacts of certain plans and programmes on the environment. It is implemented in England through the 'Environmental Assessment of Plans and Programmes Regulations 2004'.
- 1.3 The requirement for an SEA emerges from Schedule 10, paragraph 8(2)(f) of the Localism Act which states that a draft Neighbourhood Development Order (or Plan) "meets the basic conditions if the making of the order does not breach, and is otherwise compatible with, EU obligations". In this case, the relevant EU obligations are represented by the SEA Directive.
- 1.4 This SA has been scoped with support from officers at the South Downs National Park Authority (SDNPA). The view of officers was that policies which allocated sites for development – and in particular housing development - needed an SA. However, this SA has broadly considered the whole plan, its objectives and policies, against sustainability criteria.

Fernhurst Neighbourhood Plan

- 1.5 The Fernhurst Neighbourhood Plan has been developed through an extensive programme of engagement with the local community. The largest settlement is Fernhurst village although only approximately 50% of the population live within its limits.
- 1.6 The Neighbourhood Plan has been produced by local residents, with the support of the Parish Council although an independent Neighbourhood Plan Steering Group has driven the Plan forward. The Plan provides a vision for the development of the village and parish over the next 15 years and sets out to meet six main objectives:
 - Objective 1: Address the housing needs of those with a local connection to Fernhurst parish, particularly older and younger people who are unable to access housing at current market values.
 - Objective 2: Ensure the most sustainable use of brownfield sites in the parish.
 - Objective 3: Provide for the changing needs of businesses and employment within the parish.
 - Objective 4: Enhance and provide for the community's infrastructure needs.
 - Objective 5: Ensure design of development respects the local vernacular.
 - Objective 6: Protect and enhance Fernhurst parish's role in the South Downs National Park, including as a tourist destination.



2 RELEVANT POLICY AND SUSTAINABILITY CONTEXT

2.1 This section provides a summary review of the policy context relevant for the Neighbourhood Plan. Starting at the international level and working down in scale this covers the key policies that the Neighbourhood Plan should adhere to or consider. While it is common sense to ensure the Plan and SA reviews these requirements, it is also a requirement of the SEA Directive which states that the Environmental Report should include:

"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"

"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"

[Annex 1(a) and (e)]

2.2 Within this context it is stated in the NPPF that work for Neighbourhood Planning is proportionate with the scale and ambitions of the plan. We have therefore considered a range of relevant policies and plans for this assessment considering international, national, regional (South East England), and local (County and District) plans and policies.

2.3 A full policy issue review for West Sussex can be found in Appendix B of the West Sussex Waste Local Plan Sustainability Appraisal Scoping Report (October 2012) produced by West Sussex County Council and the South Downs National Park Authority¹.

International context

Key objectives	Key targets/indicators	Key implications for NP & SA
EU Habitats and Conservation of Wild Birds Directives (92/43/EEC and 79/409/EEC)		
To conserve fauna and flora and natural habitats of EU importance by the establishment of a network of protected areas throughout the European Community. This was designed to maintain both the distribution and abundance of threatened species and habitats.	Identifies endangered habitats and species requiring protection and need for re-establishment of denuded biotopes. Protected areas should be created, maintained and managed.	Plans should take account relevant SPA and SAC sites. If negative impacts are anticipated appropriate assessments should be undertaken. Above protecting the integrity and interest of European sites, the NP should consider objectives to protect and if possible, enhance biodiversity.
EU Water Framework Directive (2000/60/EC)		
To expand the scope of water protection to all waters, surface waters and groundwater. <ul style="list-style-type: none"> Achieve 'good status' for all waters by 2015. Water management should be based on river 	Prevent deterioration in the status of aquatic ecosystems, provide protection and improve ecological condition: <ul style="list-style-type: none"> achieve at least good status for all water bodies by 2015 (or later subject to specific criteria). 	Plan should consider any significant hydrological / hydrogeological factors and ensure integration with existing catchment management plans. Plan should consider including objectives to protect and

¹ <http://www.westsussex.gov.uk/idoc.ashx?docid=c69629f7-083c-4614-8ae7-81db61bab5bd&version=-1>

Key objectives	Key targets/indicators	Key implications for NP & SA
<p>basins and a 'combined approach' of emission limit values and quality standards.</p> <ul style="list-style-type: none"> Water management should include the closer involvement of community. 	<ul style="list-style-type: none"> meet the requirements of WFD protected areas promote sustainable use of water conserve habitats and species that depend directly on water progressively reduce or phase out pollutants that pose significant threats to the aquatic environment / groundwater help mitigate the impacts of floods and droughts. 	<p>enhance water resources, quality and ecological function.</p>
EU Air Quality Directive (2008/50/EC)		
<p>Establishes limit values and alert thresholds for concentrations of key pollutants in ambient air including sulphur dioxide, nitrogen dioxide / oxides of nitrogen, particulates. Maintain ambient air quality in areas where it is good and improve it in others.</p>	<p>Sets limit values and alert thresholds for concentrations of sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead.</p>	<p>Plan should consider (where relevant) the levels of sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air. Plan should consider maintaining ambient air quality and including objectives with the aim of reducing air pollution and, where possible, enhancing air quality in respect of key pollutants.</p>

National and regional context

- 2.4 In this section we summarise the most relevant regional and local plans and policies making the assumption that these include the relevant international and national sustainability objectives.
- 2.5 The Planning system is undergoing a period of change following the introduction of the Localism Act 2011 and the National Planning Policy Framework (NPPF) in 2012.
- 2.6 This has heralded significant changes including to the planning and provides a greater emphasis on localism. European Regulations still apply as does much of the legacy planning guidance – until it is revised for the NPPF.
- 2.7 The NPPF stresses the importance of sustainability running as a 'golden thread' throughout plans and policies. Published guidance March 2012 provides further information on development in areas at risk of flooding. As set out in the National Planning Policy Framework, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Minerals planning is expected to ensure that plan proposals do not have an unacceptable adverse effect on the natural or historic environment or human health.

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
National Planning Policy Framework (March 2012)		
<p>Planning should drive and support sustainable economic development. It should:</p> <ul style="list-style-type: none"> • secure high quality design and good standard of amenity • take account of the different roles of areas, recognising the intrinsic character and beauty of the countryside • support transition to a low carbon future in a changing climate, taking account of flood risk and encourage the reuse of existing resources and encouraging the use of renewable resources. • contribute to conserving and enhancing the natural environment and reducing pollution. • encourage the effective use of land by reusing land that has been previously developed. • conserve heritage assets in a manner appropriate to their significance. • focus significant development in locations which are, or can be made sustainable. 	<p>Supports local and national targets with regard to biodiversity and geodiversity.</p>	<p>Plan should contribute to the objective of achieving sustainable development (social, economic and environmental). SA Objectives should reflect the core planning principles and policies set out in the NPPF. The Plan should:</p> <ul style="list-style-type: none"> • contribute to minimising impacts and providing net gains in biodiversity where possible • contribute to the Government's commitment to halt the overall decline in biodiversity – including by establishing coherent ecological networks that are more resilient to current and future pressures.
<p>Paragraphs 115 and 116:</p> <p>"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.</p> <p>Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> • the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; • the cost of, and scope for, developing elsewhere outside the designated area, or 	<p>None</p>	<p>SA Objectives should reflect the core planning principles and policies set out in the NPPF.</p> <p>The Plan should ensure that development in the National Park and in Areas of Outstanding Natural Beauty are fully justified</p>

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
<p>meeting the need for it in some other way; and</p> <ul style="list-style-type: none"> any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.” 		
The Waste (England & Wales) Regulations 2011		
<p>To encourage/ensure waste arises/is dealt with further up the waste hierarchy. Divert waste disposal away from landfill.</p>	<p>Target of 50% of household waste to be recycled.</p>	<p>Plan must have regard to the amended waste hierarchy. Policies and objectives should where possible encourage waste to be re-used, recycled or have value / energy recovery. If possible the Plan should discourage landfilling of waste.</p>
UK Climate Change Act 2008		
<p>The Act introduced a statutory target for reducing carbon emissions.</p>	<p>Target of reducing carbon emissions by 80 per cent below 1990 levels by 2050, with an interim target of 34% by 2020.</p>	<p>Planning can make a contribution to mitigating and adapting to climate change by influencing the location, scale and character of development. The plan should include policies / objectives that contribute towards achieving lower carbon emissions and greater resilience to the impacts of climate change.</p>
Flood and Water Management Act 2010		
<p>Improve the management of flood risk for people, homes and businesses. To protect water supplies.</p>	<p>Local Authorities to prepare flood risk assessments, flood maps and plans. EA to prepare Local flood risk management strategies.</p>	<p>Plan should take account of flooding and water management issues and strategies and consider the inclusion of policies / objectives to reduce flood risks and other impacts on the water environment.</p>
Carbon Plan: Delivering our low carbon future 2011		
<p>Government-wide plan for action on climate change at domestic and international levels.</p>	<p>Includes a range of sector-based plans and targets for low carbon:</p> <ul style="list-style-type: none"> building transport industry electricity agriculture, land use, forestry and waste 	<p>The Plan should include policies / objectives that contribute towards achieving lower carbon emissions.</p>

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
English National Parks and the Broads UK Government Vision and Circular 2010		
<p>The Circular sets out the key outcomes that the Government want all those involved to focus on in the next five years:</p> <ul style="list-style-type: none"> • a renewed focus on achieving Park Purposes leading the way in adapting to, and mitigating climate change • a diverse and healthy natural environment, enhanced cultural heritage and inspiring lifelong behaviour change towards sustainable living and enjoyment of the countryside • foster and maintain vibrant, healthy and productive living and working communities • working in partnership to maximise the benefits delivered. 	<p>Document was prepared under the previous government.</p>	<p>The Plan should support the vision for the South Downs National Park. Key considerations include conservation and enhancement of natural beauty, wildlife and cultural heritage of the SDNP and the promotion of opportunities for the understanding and enjoyment of the special qualities by the public.</p>
Mainstreaming sustainable development 2011		
<p>This refreshed vision builds upon the principles that underpinned the UK's 2005 SD strategy, recognising the needs of the economy, society and the natural environment, alongside the use of good governance and sound science.</p>	<p>Promises a new set of indicators from DEFRA that link initiatives and include wellbeing.</p>	<p>Plan should take account of climate change and promote sustainability through sustainable, low carbon and green economic growth.</p>
The South East Biodiversity Strategy (South East England Biodiversity Forum) 2009		
<p>Provides a coherent vision to safeguard and enhance the regions biodiversity and wildlife. Embed a landscape scale approach to restoring whole ecosystems in the working practices and policies of all partners. Create the space needed for wildlife to respond to climate change. Enable all organisations in the South East to support and improve biodiversity.</p>	<p>Provides a framework for the delivery of biodiversity targets through biodiversity opportunity areas and habitat and species targets.</p>	<p>The NP should consider objectives to protect and where possible, enhance biodiversity.</p>
South East River Basin Management Plan		
<p>Prepared under the Water Framework Directive, the plan is about the pressures facing the water environment in the South East River Basin District and the actions that will address them.</p>	<p>By 2015, 18% of surface waters (rivers, lakes, estuaries and coastal waters) are going to improve for at least one biological, chemical or physical element. By 2015, 23% of surface waters will be at good or better ecological status/potential and 33% of groundwater bodies will be at good status. In combination 23% of all water bodies will be at good status by 2015.</p>	<p>The NP needs to consider the impact of proposed development on water quality.</p>

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
	At least 47% of assessed surface waters will be at good or better biological status by 2015.	
Arun and Western Streams Catchment Flood Management Plan		
Considers all types of inland flooding, from rivers, groundwater, surface water and tidal flooding, but not flooding directly from the sea (coastal flooding)	Flood risk to property in a 1% annual probability river flood, taking into account current flood defences	The NP needs to consider the impact of flooding in the Rother Valley/River Arun/The Weald area on proposed development.

2.8 There are no Environment Agency flood risk strategies currently covering the South East region.

County/local context

2.9 West Sussex County Council prepares statutory land use plans for waste and minerals policy and non-statutory guidance on Landscape Character Assessment. While the Structure Plan for the period 2001-2016 no longer has formal status, the County Council state that it still provides 'the strategic context for the our views on land use and transport.'

2.10 West Sussex County Council and the South Downs National Park Authority have produced a Proposed Submission Draft Waste Local Plan which covers the period to 2031 and will become the most up-to-date statement of the Authorities' land-use planning policy for waste. The consultation on this ran until 11/01/2013. The draft plan was based upon an evidence base report the Waste Plan Background Document 2012².

2.11 A key element of the plan is the aspiration to become a zero-waste-to-landfill county and the vision for the Plan is to ensure that communities, the environment, economy and special character of West Sussex are protected.

² <http://www.westsussex.gov.uk/idoc.ashx?docid=7f141103-7244-4058-ad10-fcd1d4350e74&version=-1>

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
West Sussex Transport Plan 2011-2026		
<p>To improve quality of life for the people of West Sussex via four key strategies to maintain, manage and invest in transport:</p> <ul style="list-style-type: none"> • promoting economic growth • tackling climate change • providing access to services, employment & housing • improving safety, security & health 	<p>Indicators include: congestion, mode of travel to work and school, cycling trips, accessibility, road traffic accidents, road and footway maintenance, street lighting, highway structures, road flooding, air quality and transport emissions.</p>	<p>The Plan should consider policies / objectives which contribute to transport sustainability. This should go beyond reducing carbon emissions to include economic growth, safety, pollution, traffic reduction and access to services.</p>
West Sussex County Council - Building A Sustainable Future: A strategy for delivering the corporate priority 2012		
<p>This Strategy focuses on four key priority areas that address the main challenges facing West Sussex County Council. The four priorities for action are:</p> <ul style="list-style-type: none"> • reduce carbon emissions • adapt to a changing climate • use resources efficiently and effectively • make sustainability business as usual. 	<p>The Strategy contains information about why these areas are a challenge to the County and sets out actions and 'clear and challenging targets against each priority'.</p>	<p>Plan should consider including objectives / policies to support reductions in carbon emissions, and consider adaptation to a changing climate and the efficient use of resources.</p>
Sustainable Community Strategy for West Sussex 2008 - 2020		
<p>Cross cutting strategy aiming to:</p> <ul style="list-style-type: none"> • relieve the pressures on the road network • explore opportunities for renewable energy • integrate water resource requirements in new development • reduce carbon footprint • improve waste management to reduce waste generation and increase recycling. • make best use of innovation and new technology to reduce harmful emissions • improve access for all to the natural and historic environment and a range of sporting, leisure, cultural and arts activities. 	<p>No specific targets.</p>	<p>The Plan should consider including policies / objectives that help meet the key objectives.</p>
Sussex Biodiversity Action Plan		
<p>Maintain and, where practicable, enhance the wildlife and habitats that provide the natural character and diversity of Sussex</p> <ul style="list-style-type: none"> • Identify priority habitats and species in Sussex • Set realistic and ambitious targets and timescales for priority habitats and species and to monitor progress towards them • Raise public awareness and 	<p>Sussex Biodiversity Record Centre inventory statistics for species and habitats e.g.:</p> <ul style="list-style-type: none"> • Rare Species Inventory • Biodiversity Action Plan Species Inventory • Pond Inventory. 	<p>Plan should include consider including policies / objectives to: enhance (where possible) the wildlife and habitats that give rise to West Sussex's natural character and diversity.</p>

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
encourage involvement in biodiversity action.		
West Sussex Strategic Flood Risk Assessment 2010		
<p>The main objective of the SFRA is to provide flood information so that an evidence and risk based sequential approach can be made when making planning decisions in line with the NPPF. It also aims to:</p> <ul style="list-style-type: none"> cover a wide spatial area and look at flood risk today and in the future support sustainability appraisals of the local development frameworks identify further investigations that may be required to assess specific development proposals. 	The assessment investigates flood risk issues for specific sites and makes recommendations.	The Plan should take into account the SFRA's sequential testing guidance and should consider inclusion of objectives related to flood risk.
A Strategy for the West Sussex Landscape - West Sussex County Council 2005		
<p>1: ensure high quality new development which contributes to and reinforces landscape character 2: conserve and enhance historic landscape character 3: ensure the maintenance and renewal of the agricultural landscape 4: conserve and enhance semi-natural habitats including securing the future of woodlands, hedgerows and trees as distinctive landscape features 5: promote and celebrate the value and variety of the West Sussex landscape.</p>		Plan should be consistent with supporting the objectives in the strategy.
Using Less, Living Better - West Sussex Environment and Climate Change Board, 2012		
Helping to reduce emissions by at least 50% by 2025.	None	The Plan should seek to reflect, where possible, the actions proposed and the outcomes that are envisaged.
South Downs National Park Partnership Management Plan, 2014-2019 (draft)		
<p>11 outcomes:</p> <ul style="list-style-type: none"> The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the impacts of major development and small-scale cumulative change. There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures. A well-managed and better connected network of habitats and increased population and distribution of priority species now exist in the National 	The Management Plan includes a range of targets for each of the eleven outcomes.	It is important that these outcomes and their targets inform the NP and its policies.

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
<p>Park.</p> <ul style="list-style-type: none"> • The condition and status of many cultural heritage assets and their settings (including monuments, buildings, towns and buried remains) is significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and pride. • Outstanding visitor experiences are underpinned by a high quality access network supporting improved health and wellbeing. • There is widespread understanding of the special qualities of the National Park and the benefits it provides. • The range and diversity of traditional culture and skills has been protected and there is an increase in contemporary arts and crafts that are inspired by the special qualities of the National Park. • More direct action and responsibility is taken by visitors and residents to conserve and enhance the special qualities and use resources more wisely. • Communities and businesses in the National Park are more sustainable and there is better access to essential services and facilities. • A diverse and sustainable economy has developed which provides a wide variety of business opportunities, employment and services amongst which are those that are positively linked with the special qualities of the National Park. • Widespread opportunities exist for skilled employment and livelihoods, including enterprises that are based on the special qualities of the National Park. 		
South Downs Integrated Landscape Character Assessment (Updated) 2011		
<p>The purpose is to produce a comprehensive, fully integrated assessment of all aspects of the landscape character of the South Downs, so that greater understanding of this nationally important landscape and its needs and opportunities can lead to improved management and enjoyment.</p>	<p>Evaluates each landscape according to its sensitivity and key issues and trends relating to change.</p>	<p>The site allocations in the NP should consider the potential impact of the built form on the landscape.</p>

District policy context

- 2.12 Fernhurst is within the South Downs National Park Authority area for planning purposes. However, until the SDNPA has a local plan in place, the extant policies of Chichester district must apply.
- 2.13 Chichester District Council's extant policies 'saved' from the District Local Plan First Review (adopted April 1999) make up the Development Plan.
- 2.14 The Development Plan also includes 'saved policies' from the West Sussex Minerals Local Plan.
- 2.15 The weight given to policies from the plans above will depend upon the degree to which they conform to the National Planning Policy Framework (NPPF) which in the event of any conflict will take precedence.
- 2.16 In April 2011 the South Downs National Park Authority became the local planning authority for the National Park area and became responsible for preparing a separate Local Plan covering the entire National Park and including the area within Chichester District.
- 2.17 The Local Plan will set out how the National Park will develop into the future. It is proposed that the National Park's Local Plan will be formally submitted to the Secretary of State in June 2016 and be adopted by June 2017. It will set the planning policy framework for the National Park for the period up to 2035. It is likely to continue to evolve over time to meet the changing needs and aspirations of the National Park.
- 2.18 The revised Local Development Scheme (August 2012) sets out the project plan for the National Park's Local Plan (http://www.southdowns.gov.uk/_data/assets/pdf_file/0005/263048/Final-LDS-1st-revision-August-2012.pdf).
- 2.19 The Statement of Community Involvement (March 2012) sets out how the National Park Authority will look to engage and consult ([http://www.southdowns.gov.uk/_data/assets/pdf_file/0014/141332/SCI Adopted 20120313 NPPF Regs approved.pdf](http://www.southdowns.gov.uk/_data/assets/pdf_file/0014/141332/SCI_Adopted_20120313_NPPF_Regs_approved.pdf)).
- 2.20 As the local planning authority for Fernhurst, the SDNPA is responsible for setting targets for housebuilding. Its emerging work on the Local Plan has yet to establish possible housing targets for the National Park or for individual settlements. However, the SDNPA June 2013 Settlement Hierarchy Study identifies Fernhurst as a Tier 3 settlement. There are only two Tier 1 settlements (Lewes and Petersfield) and two Tier 2 settlements (Midhurst and Liss). As such, Fernhurst is one of the larger settlements in the National Park and therefore is likely to have to accommodate levels of housing growth commensurate with that status.

Summary of key policy issues

- 2.21 As has been summarised above there is a plethora of policy and policy-related information of possible relevance to the Neighbourhood Plan. However, despite some of the inherent complexity these documents generally fit within a policy hierarchy from international down to local and stress the same key requirements. The majority stress the key importance of sustainability. Rooted in environmental protection (and enhancement where possible) they stress the key pillars of sustainability as described in the NPPF and these must be acknowledged and met by the Neighbourhood Plan. These can be summarised in the following categories – although each is dependent upon the others:

Environmental needs

- 2.22 Protect and enhance all aspects including the natural, built and historic environment. European sites and species should be protected as should those supporting regional and local character. Biodiversity and landscape character should be protected and enhanced while environmental resources are used prudently. Waste should be minimised as should pollution to air and water. Against the background of climate change, plans should look to support the transition to a low carbon economy and help mitigate and adapt to future conditions.

Social needs

- 2.23 Support and develop thriving communities with high quality built environment that help meet the needs of current and future generations. This includes providing access to social and cultural services and supporting health and wellbeing.

Economic needs

- 2.24 Build and enhance a resilient and competitive economy that can support growth and required infrastructure.
- 2.25 These key themes are dependent upon each other to different extents and tensions arise between them. Social and economic objectives require an increase in housing supply and this should be achieved in an appropriate balance with all key objectives to ensure maximum benefit for local communities.

3 KEY SUSTAINABILITY FEATURES

3.1 This chapter was compiled from a wide range of information sources. Firstly information came from the draft Neighbourhood Plan and associated work conducted to support it. As part of the widespread consultation work to support the plan this has included feedback from a range of consultees. There are also a number of key reports relevant to the environment of the area and some of their key findings have been summarised here – they are referenced through the text, as are various data sources used to provide maps and statistics. This section presents topics relevant to the Neighbourhood Plan and while it seeks to be comprehensive only the key issues are included to keep the document manageable.

Nature conservation and biodiversity

3.2 The rural and relatively unspoilt landscape and the presence of a significant amount of ancient woodland provides the area with a rich conservation and biodiversity resource. The parish contains one nature reserve, Cooksbridge Meadow, which is managed by the Sussex Wildlife Trust.

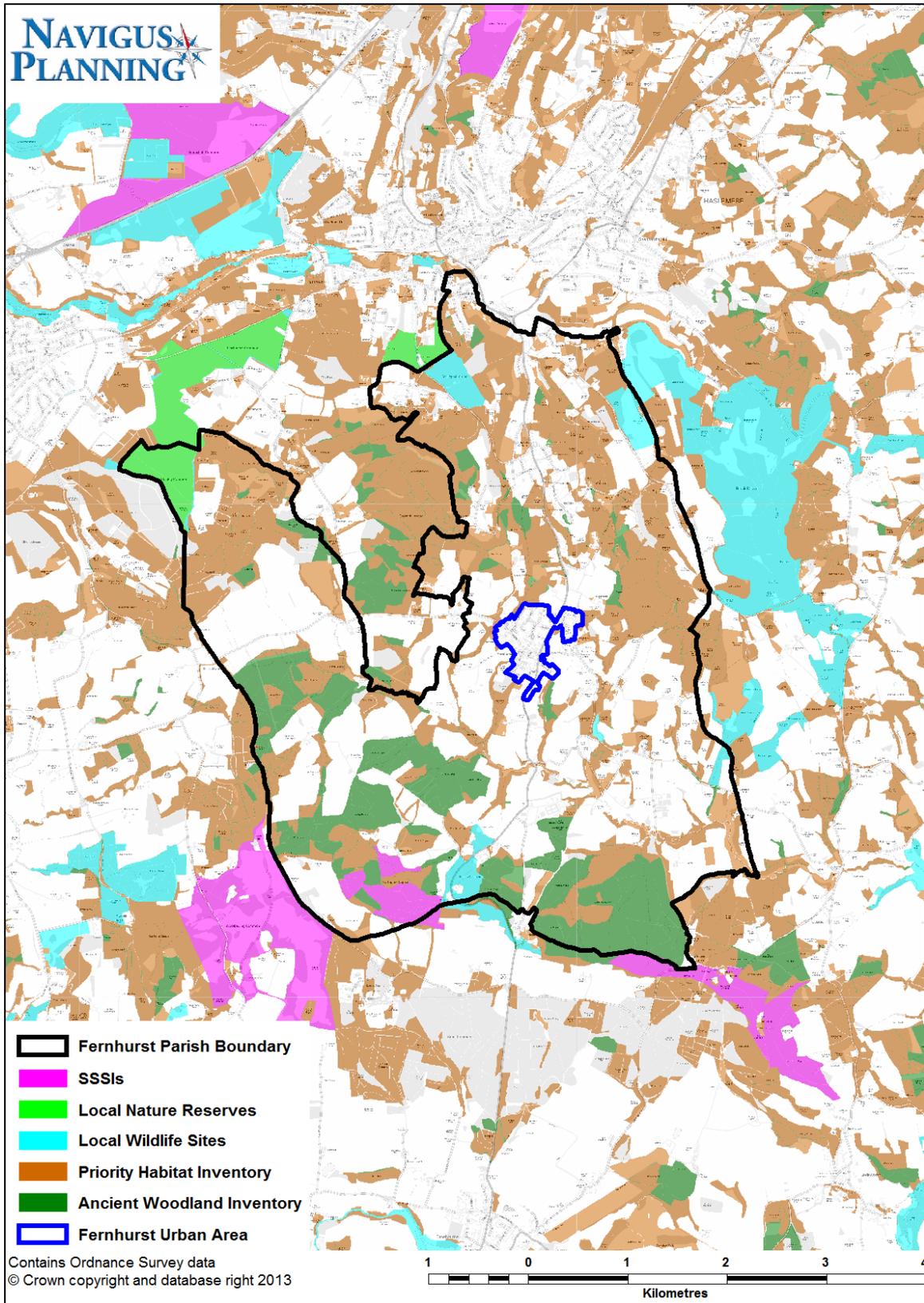
3.3 Cooksbridge Meadow is currently a quiet and relatively undisturbed site of pasture, with parkland oaks backing on to a strip of oak woodland. It is regularly grazed with sheep as part of its management regime. A public right of way runs through the site.

3.4 Figure 3.1 provides a map of the environmental features of the area. The nearest major environmental feature is the Ebernoe Special Area of Conservation (SAC), although this is over six kilometres to the east of the parish boundary.

3.5 There is a significant mix of ancient woodland and priority habitats. It also has two Sites of Special Scientific Interest – Perry Copse Outcrops in the heart of the parish and Woodbeding and Pound Commons in the south. In the extreme north west of the parish is part of a local nature reserve.

3.6 Although not shown on Figure 3.1, there are also a number of Sites of Nature Conservation Importance (SNCIs). SNCIs are non-statutory designations which are identified at a county level. They typically form a network of sites that are recognised to be of local conservation importance and are often of considerable wildlife value due to the special interest of their flora or fauna, but for one reason or another have not been recognised in national designations. Although SNCIs have no statutory protection they need to be considered in the planning process.

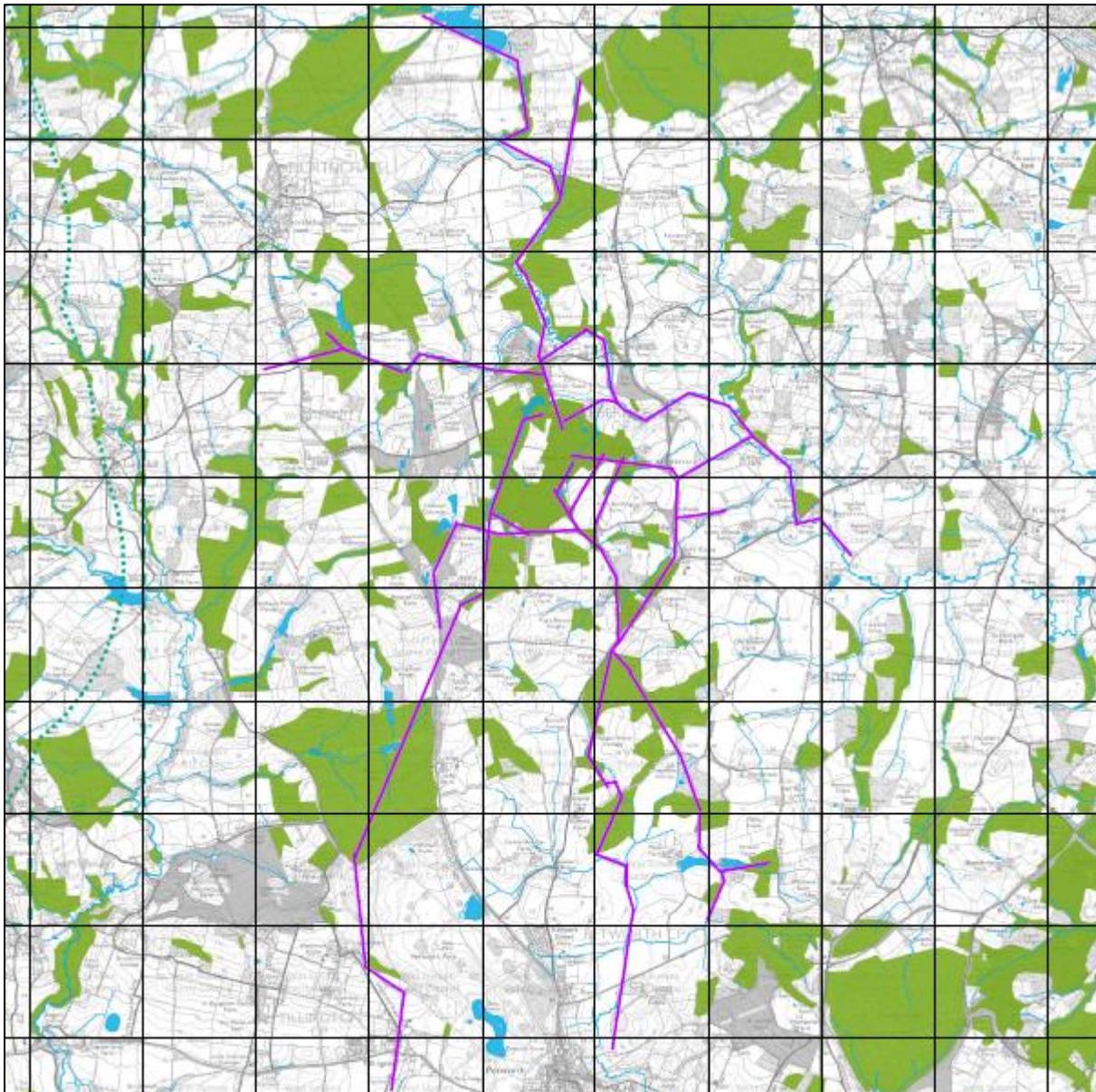
Figure 3.1: Key environmental features



Species

- 3.7 Bats are perhaps the most important species present in the wider area to Fernhurst parish, with the area being considered exceptional for the number of species and their rarity. While bats are highly protected in law, they are vulnerable to changes in habitat (where they live, breed and feed) which affect their survival. Barbastelle bats roost in Ebernoe common and 'commute' down the river Kird corridor and associated wood and hedge lines.
- 3.8 However, as is shown in Figure 3.2, the bat flight lines do not extend even close to the two-kilometre buffer applied for assessment purposes around the parish boundary.

Figure 3.2: Bat flightlines from Ebernoe SAC

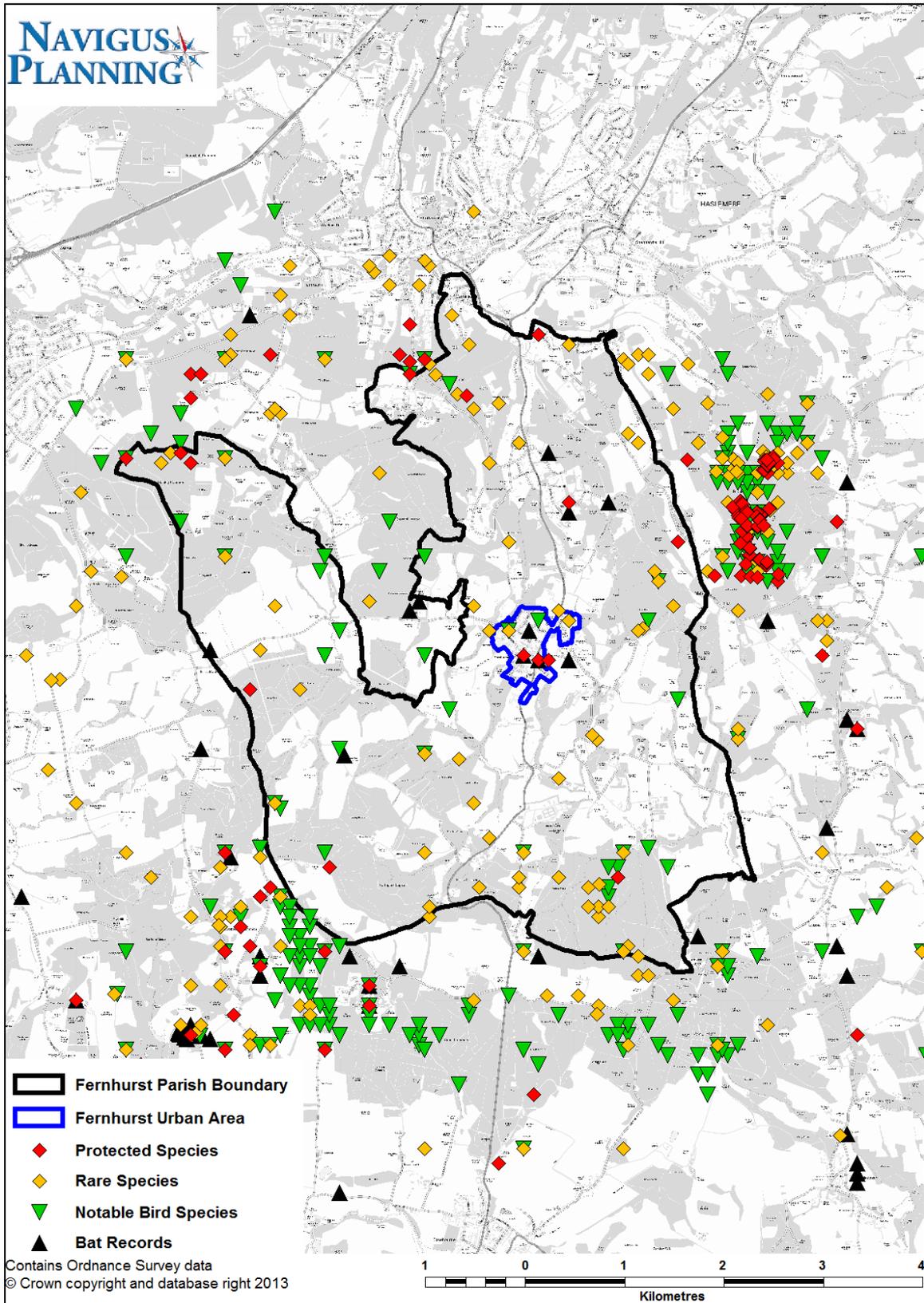


..... 2km buffer around Fernhurst parish boundary (shown on western edge of map)

Source: Sussex Biodiversity Records Centre

- 3.9 Figure 3.3 shows the protected species in the parish.

Figure 3.3: Protected species map



- 3.10 A full list of the protected species are listed and assessed in the 'Desktop Biodiversity Report' undertaken for the Fernhurst Parish and an additional two-kilometre buffer by the Sussex Biodiversity Records Centre.

Landscape

- 3.11 Fernhurst is a rural parish in the very northern part of the National Park. It is entirely covered by the Sussex Downs Area of Outstanding Natural Beauty (AONB).
- 3.12 The parish is within the Weald landscape area. The South Downs Integrated Landscape Character Assessment³ from 2011 classifies the landscape of the parish as partly Greensand Hills and partly Low Weald. Greensand Hills, which cover the Blackdown area, are steep, prominent hills formed by the resistant sandstones of the Hythe Formation. They form a horseshoe-shaped escarpment. The Low Weald, which covers the remainder of the parish, comprises a gently undulating lowland vale landscape found on the dense Weald clays.
- 3.13 The northern elevated Lower Greensand plateaux include parts of Blackdown, at 280m the highest point in Sussex. The whole area is well wooded and many fields are bounded by attractive hedgerows with mature beech and oak trees. It retains many sunken lanes, gylls and long range views to the South Downs.

Table 3.1: Development considerations for landscape character areas covering Fernhurst parish

Greensand Hills	Low Weald
Conserve the low density of dispersed settlement which contributes to the tranquil rural character of the area.	Soften the built edges of villages by introducing small scale planting schemes using native broadleaved species. Planting should integrate with the surrounding landscape pattern.
Maintain the characteristic loose agglomerations of common-edge settlement and avoid infill or extensions which would create a more compact, solid settlement form along roads.	Consider impact on views into the valley from the surrounding higher land in relation to any proposed change.
Ensure that any built development reflects the local vernacular - resist suburban style garden boundaries, kerbs, and lighting. Conserve the remote rural character of the landscape.	Maintain the dispersion of settlement at its current level and prevent infilling.
Ensure recreational facilities, such as horse riding centres and golf courses, do not erode sense of tranquillity. Avoid use of excessive lighting, signage and 'suburban' features.	Conserve the settlement form of a medieval agglomeration of farmsteads and later buildings set around a central 'village green'. Avoid infilling of these greens.
Minimise use of signage in this rural landscape. Where necessary, use signage that fits with the rural character of the landscape, drawing on vernacular designs.	Conserve the isolated farmsteads of medieval origin and their setting within areas of early enclosure.
Conserve the character of the ancient sunken lanes – resist pressure for road improvements which would alter the experience of travelling through the landscape.	Ensure that any built development reflects the local vernacular – develop design guidance and seek to resist suburban style garden boundaries, kerbs, and lighting.
Monitor the effects of incremental change to	Monitor the effects of incremental change to

³ Land Use Consultants (2011) *Integrated Landscape Character Assessment (Updated)* for South Downs National Park Authority

Greensand Hills	Low Weald
buildings and land, and minimise such change by providing design guidance and encouraging applicants to enter into discussions at an early stage in the preparation of their proposals.	buildings and minimise such change by providing design guidance and encouraging applicants to enter into discussions at an early stage in the preparation of their proposals.
Consideration should be given to the potential impact of any proposals for wind turbines or communication masts. Particular attention should be paid to views from key viewpoints as well as impacts on the less tangible aspects of character such as the special sense of remoteness and tranquillity associated with this area.	

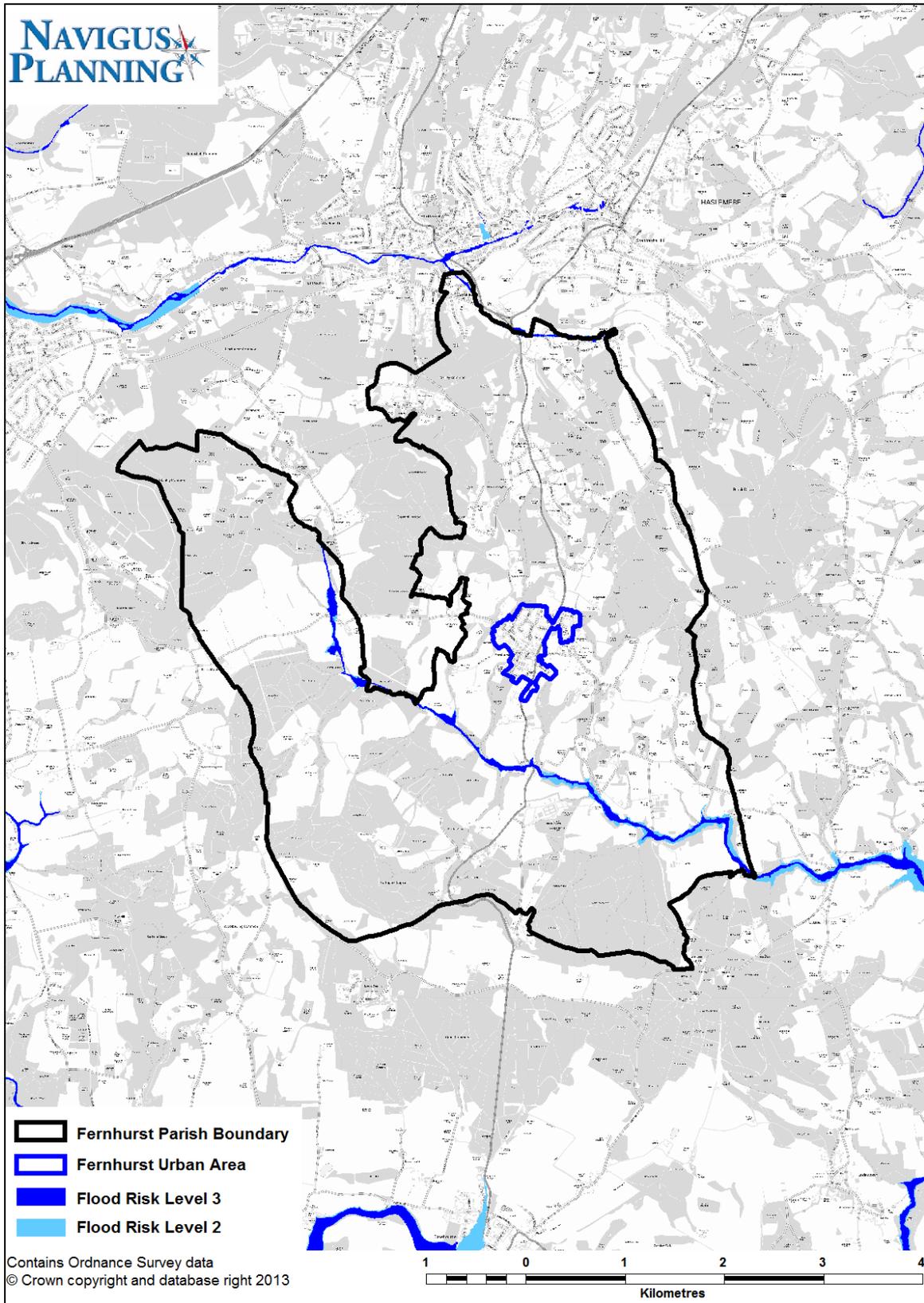
Source: Land Use Consultants (2011) *Integrated Landscape Character Assessment*, for South Downs National Park Authority

- 3.14 Also important for the Low Weald is the impact of views from Fernhurst village to the surrounding higher land.
- 3.15 A further possible landscape impact would be if oil and gas drilling were to take place and drilling rigs were erected.

Water

- 3.16 The village lies in the Milland/Fernhurst Vale, drained by the River Lod which in turn is a tributary of the Rother which joins the river Arun near Littlehampton. There have been few reporting incidences of flooding and the Environment Agency has confirmed that the large majority of the parish is in Flood Zone 1, which is defined as having a low probability of flooding from rivers or the sea. This is shown in Figure 3.4 below.

Figure 3.4: High flood risk areas



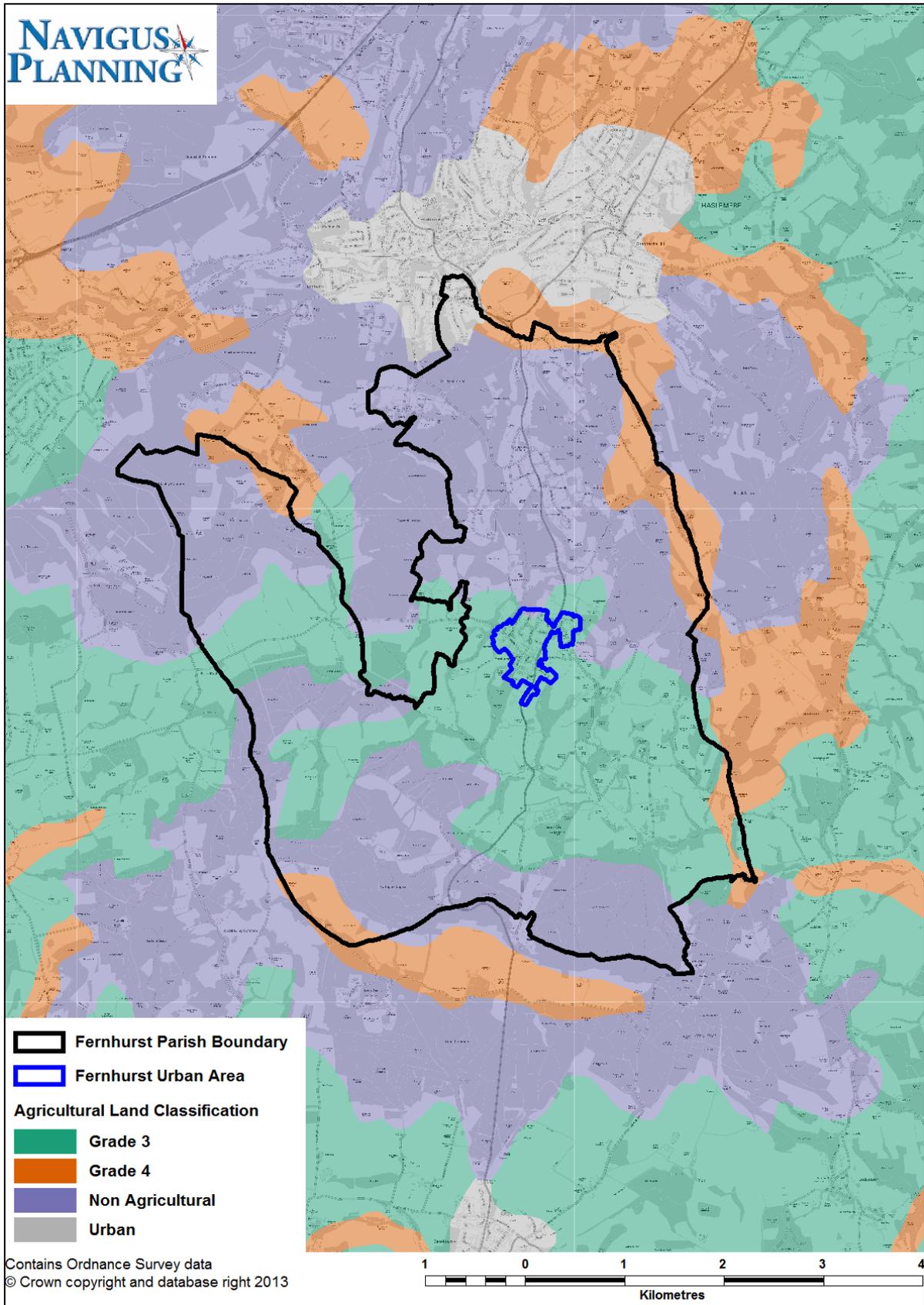
Soil and Geology

- 3.17 Fernhurst parish is dominated by sandstone and mudstone. The parish is partly classified as Greensand Hills and partly Low Weald. The Low Weald Clay formation gives rise to heavy clay soils and the Greensand Hills to low fertile, sandy soils.
- 3.18 The National Soils Map (NSRI 2001⁴) suggests three main soil types are present in the parish:
- Freely draining, very acid, sandy and loamy soil in the north and the south of the parish
 - Slow permeable, seasonally wet, basic loams and clays across most of the centre of the parish
 - Naturally wet, loamy soils across isolated parts of the centre of the parish.
- 3.19 The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. Published by Natural England⁵, the ALC provides a classification in 5 grades using a number of criteria including climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, micro-relief, flood risk) and soil (depth, structure, texture, chemicals, stoniness). The scales ranges from 1 (high quality) to 5 – poorest.
- 3.20 The NPPF (paragraph 112) states that relevant planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. The ALC for Fernhurst is shown in Figure 3.5 below.

⁴ National Soil Resources Institute (2001). National Soil Map. Cranfield University.

⁵ <http://publications.naturalengland.org.uk/file/4424325>

Figure 3.5: Map of agricultural land classification



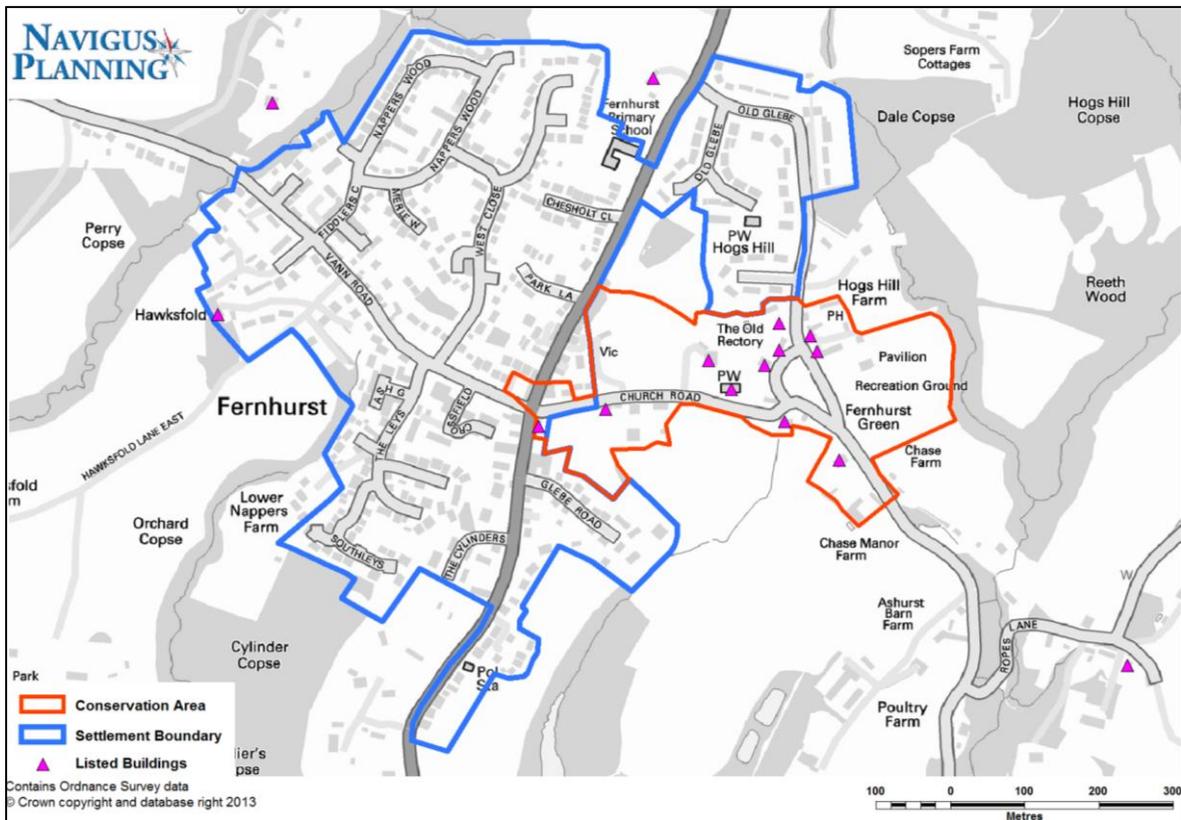
3.21 This shows that the majority of land across the parish is of low agricultural value.

Heritage

3.22 The parish includes 44 listed buildings which are all grade II or grade II*. 15 of the total are in or near the Fernhurst village settlement area. In addition, a civic list of buildings is maintained in the Fernhurst Archive which identifies non-listed buildings of heritage interest.

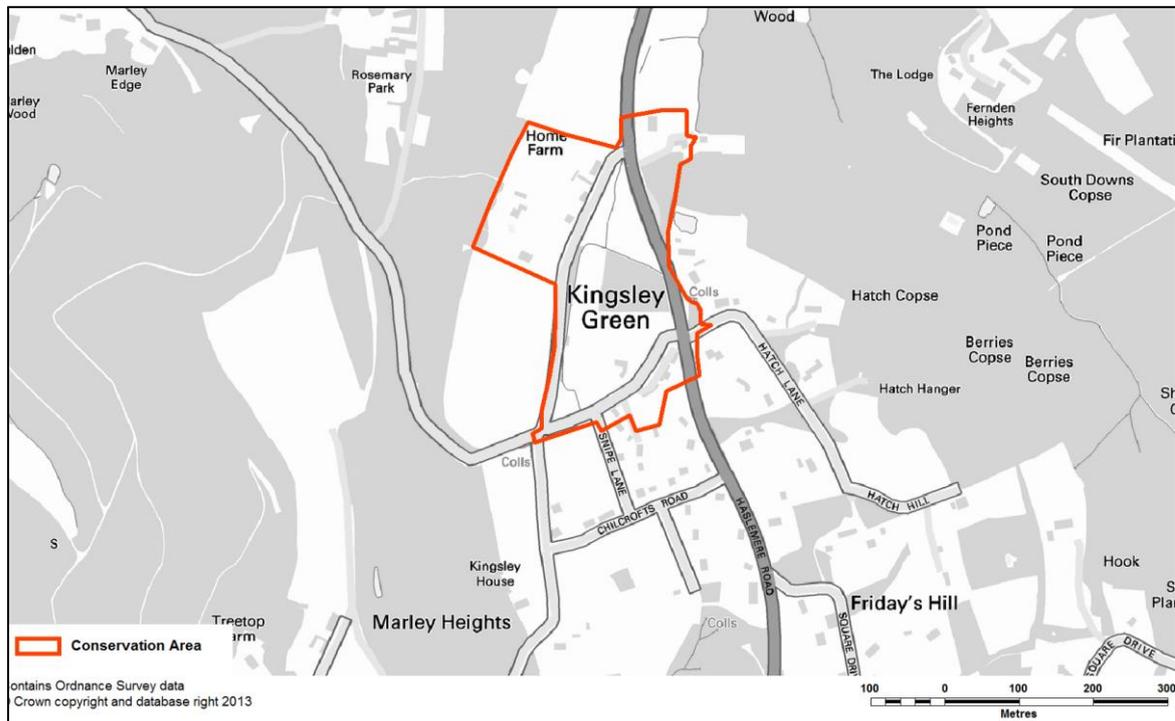
3.23 Part of Fernhurst village is subject to conservation area status. The Conservation Area covers a small part on the eastern side of the village, with the majority being outside the settlement boundary. Common local materials include sandstone, local brick and Wealden clay, used for tiles. This is shown in Figure 3.6.

Figure 3.6: Listed buildings and Conservation Area in Fernhurst village



3.24 Kingsley Green also has a Conservation Area as shown in Figure 3.7:

Figure 3.7: Conservation Area in Kingsley Green



Material assets

- 3.25 Despite growth over the last twenty years, Fernhurst remains a small village. It is home to approximately half of the properties in the parish. It has a church, pub, village hall, Scout hut, Youth Club facility, Parish & Community Room (at the church) and the Fernhurst Centre, a place for people to meet and use its IT facilities. The recreation ground also has facilities for a range of activities as well as a pavilion.
- 3.26 In the centre of the village there are a small number of shops, including a post office and pharmacy. The Fernhurst Centre provides a facility for people to use IT services. There are various other shops but no convenience goods store that would be of sufficient scale to provide for 'top up' food shopping.
- 3.27 The village also has a primary school and a GP surgery, although the surgery is only open three-and-a-half days a week.
- 3.28 Public transport comprises a single bus service (with an hourly service) which has been under threat of service reductions. There are voluntary/community transport services offering services at certain times of the day to certain locations, e.g. Haslemere for hospital and supermarket services.
- 3.29 Fernhurst has a primary school that is shortly to expand to address identified needs of children already born and expected to attend school.

Social and economic indicators

- 3.30 The 2011 Census recorded that the population of the super output areas comprising Fernhurst parish was 3,660 persons, living in 1,527 households. Since 2001, the population has grown by 216 persons, or 6.3%. Comparatively, the Chichester district population grew by 6.9%. Over the

same period, the number of households grew by 85 (5.9%) in Fernhurst and by 4,052 in Chichester district (8.9%). This number will reflect the number of new houses built over the decade and also possibly the sub-division of existing properties into multiple households.

- 3.31 There has been a broad trend in the increase in population and number of households across the wider district but the rate of increase appears to be lower in Fernhurst. One possible explanation for this could be the cessation of activities by ICI at its Syngenta site in the parish.
- 3.32 The statistics also provide information on the number of empty homes and for Fernhurst these are between the district and national average, as are the number of second homes. In the case of the latter, Fernhurst is much lower than the equivalent figure for Chichester district. This is shown in Table 3.2.

Table 3.2: Percentage homes that are empty, 2008

	Fernhurst parish	Chichester district	England
Percentage of dwellings empty for more than 12 months (not including second homes)	1.25	1.1	1.4
Percentage of all dwellings that are second homes	1.4	5.2	0.9

Source: ONS

- 3.33 Another barrier for access to housing is house prices – both in relative and absolute terms. In October 2012, the average price of a flat in the GU27 postcode area (covering Fernhurst and Haslemere) was £205,000⁶. Based on a 95% mortgage, a couple would need a combined income of £78,000, or a single person an income of £65,000, to be able to buy such a property.
- 3.34 Neighbourhood statistics provides information on household energy use and this reveals some key differences between the Fernhurst area and the wider district. The limited coverage of mains gas supply to the parish appears to drive up the consumption of electricity and the use of oil for central heating – this is confirmed by the 2011 Census data which shows a high level of solid and oil fired central heating. High levels of energy use reflect a number of factors including the thermal efficiency of heating systems, levels of household insulation and also household income – on average wealthier households consume more energy. This is shown in Table 3.3.

Table 3.3: Domestic energy consumption, 2009, K/watt hours

	Fernhurst parish	Chichester district	England
Average consumption of ordinary domestic electricity	5,282	4,393	3,797
Average consumption of economy 7 domestic electricity	7,073	7,473	5,627
Average consumption of domestic gas	21,965	15,095	15,350

Source: ONS

- 3.35 The area (Chichester 001A and 001C) ranks amongst the least health deprived of English regions at 31,454 and 31,126 out of 32,482.
- 3.36 Table 3.4 shows the general health of the population. This shows that Fernhurst has health levels broadly similar to Chichester district and to the national average.

⁶ Source: www.home.co.uk

Table 3.4: General health, 2011

	Fernhurst parish	Chichester district	England
Very good health	48%	54%	47%
Good health	35%	33%	34%
Fair health	13%	10%	13%
Bad health	3%	2%	4%
Very bad health	1%	1%	1%

Source: 2011 Census

Summary of key issues

Landscape

- 3.37 The landscape of Fernhurst is historic and distinctive. The parish lies in the South Downs National Park in an Area of Outstanding Natural Beauty and much of the rest is of an equivalent quality with medieval field patterns, wide bordered country lanes, mature hedges and a high density of woodlands. Maintaining rights of way is an important issue.

Nature conservation and biodiversity

- 3.38 Fernhurst has a rich natural history with a number of rare species. The biodiversity interest appears to be relatively stable, but further habitat restoration and re-connection will be needed to help support and develop a connected and functioning landscape in the face of climate change and other pressures.

Heritage

- 3.39 Fernhurst has a number of listed buildings in the village and parish and there is a Conservation Area in the village.

Population and housing

- 3.40 Access to housing is a significant barrier, with house prices some of the highest in the South East. The community has identified the need to provide more affordable housing for local people and more dedicated places for the elderly as the population ages.

4 SUSTAINABILITY APPRAISAL FRAMEWORK

- 4.1 The SA framework was developed using a number of different sources. As an overarching guide, we referred to the 2005 UK Government's Sustainable Development Strategy, 'Securing the Future', to ensure that the areas covered in the SA were aligned with its guiding principles. Given that the SDNPA was only formed in 2011, it does not have a Local Plan and therefore does not have an established SA framework based on sustainability principles. Given Fernhurst's location within Chichester district, it was therefore considered appropriate to use its SA framework as a reasonable alternative.
- 4.2 The SDNPA does have an emerging SA framework which is being developed in relation to the emerging National Park Management Plan and Local Plan documents. The June 2013 Scoping Report initially identifies 21 sustainability objectives from the now revoked Regional Spatial Strategy (RSS) for the South East. These were then refined, based on their relevance to the National Park, resulting in 11 criteria being taken forward.
- 4.3 These 11 criteria in the emerging SDNPA SA framework were then compared to those in the Chichester Local Plan SA Framework. As a result, two criteria from the SDNPA SA framework were added to the Chichester Local Plan framework in order to arrive at a comprehensive SA framework that did not duplicate criteria.
- 4.4 The framework is shown below:

SA Objective	SA Assessment Criteria
1) Protect and enhance wildlife	Does the option prevent biodiversity loss and habitat fragmentation?
	Does the option allow for movement of habitats with climate change?
	Does the option enhance biodiversity opportunities and create new habitat?
2) Maximise efficient use of natural resources	Does the option protect water resources?
	Does the option maximise use of waste resources?
	Does the option make efficient use of energy, make consumption more sustainable and reduce food miles?
3) Reduce pollution	Does the option reduce air pollution from industrial processes and transport?
	Will the option assist the remediation of contaminated land?
	Does the option reduce levels of water pollution?
4) Achieve zero net increase in greenhouse gas emissions	Does the option maximise the use of renewable and low carbon energy sources
	Does the option reduce the need to travel?
	Does the option minimise the embodied carbon in goods and buildings?
5) Minimise flood risk for new and existing development	Does the option reduce the risk of coastal, fluvial surface water and groundwater flooding?
	Does the option increase the use of SUDS and provide opportunities for restoring natural function to river and coastal systems?
6) Ensure the district adapts to the effects of climate change	Does the option ensure the district adapts to the effects of climate change?
7) Achieve a sustainable and integrated transport system	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?

SA Objective	SA Assessment Criteria
	Does the option create able networks for cyclists and pedestrians?
8) Conserve and enhance landscape and built heritage	Does the option encourage sustainable land management practices for landscape conservation?
	Does the option ensure protection of traditional urban forms?
	Does the option ensure protection of listed buildings, conservation areas and archaeological sites?
9) Increase availability of affordable housing	Does the option meet local housing need?
	Does the option provide the right housing mix of size and tenure, allowing for the continuation of sustainable mix of people within communities?
	Does the option ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability.
10) Provide access to services and facilities	Does the option improve access to services and facilities?
11) Improve community safety	Does the option improve community safety?
12) Promote economic development to maintain quality of life and competitiveness	Does the option deliver improved quality of life for all?
	Does the option improve the health and well-being of the population and reduce inequalities in health and well-being?
	Does the option create and sustain vibrant communities which recognise the needs and contributions of all individuals?
	Does the option ensure that economic opportunities are accessible to all?
	Does the option ensure that value added is retained in the District?
13) Develop a dynamic diverse and knowledge based economy that excels in innovation with higher value, lower impact activities	Does the option encourage innovation?
	Does the option develop knowledge based economy locally?
14) To develop and maintain a skilled workforce to support long-term competitiveness	Does the option ensure skills are enhanced to increase access to works?
	Does the option ensure a skilled workforce is available locally to allow business developments?
15) Enable viability of the rural economy with enhanced diversity of employment opportunities	Does the option promote a prosperous and diverse rural economy?
	Does the option promote sustainable tourism?

5 ASSESSMENT OF SUSTAINABILITY OF NON-SITE-BASED POLICIES

Housing

- 5.1 In seeking to establish the appropriate scale of housing development identified in the Fernhurst Neighbourhood Plan, a number of sources were used. With the SDNPA Local Plan being in its infancy, there was no clarity provided at a National Park level. The only evidence provided was in a Housing Requirements Study, undertaken by DTZ for the SDNPA and published in October 2011. This identified Fernhurst as one of the larger settlements in the National Park and therefore gave a clear indication that it would have a responsibility to provide new housing to address the needs of a wider hinterland.
- 5.2 The starting point was ascertaining the views of the community as to different levels of growth. As is discussed in Chapter 6, there was strong resistance from the community to greenfield releases around the edge of Fernhurst village. This was ascertained through the community events and survey questionnaire, which are detailed in Chapter 6. Therefore, in considering the potential locations for development, it was clear that this would inform the level of development that could be accommodated. In particular, the potential for growth at the Syngenta site would represent the significant majority of the overall level of growth that would be provided in Fernhurst over the plan period.
- 5.3 The implications of different levels of growth were considered at a housing workshop with the community in October 2012. This helped to inform the strategy.
- 5.4 Technical evidence was provided by the Strategic Housing Market Assessment (SHMA) which further helped to establish the contribution that Fernhurst was likely to have to make to addressing objectively assessed needs. This had to be weighed up against the potential for the brownfield strategy and the identified sites to address this need. If it had been unable to address these needs, then it would have been necessary to consider greenfield releases around the village.

Employment

- 5.5 In proposing the Hurstfold Industrial Estate for allocation as a residential site (Policy SA3), the existing businesses on the site would have to relocate. The Neighbourhood Plan considered that to lose these businesses, many of which provide important services to the local community (e.g. car servicing and repair, etc), would be unacceptable as it could have an unsustainable economic impact on Fernhurst parish.
- 5.6 Therefore it was considered that an allocation at Hurstfold for residential uses would only be appropriate if those existing businesses on the Industrial Estate were given the opportunity to relocate within Fernhurst.
- 5.7 The allocation at Syngenta (Policy SA2) provides one possible location for such businesses. In order to provide choice in possible locations, it was considered appropriate to allocate a small amount of land at Fernhurst Business Park (Policy EM1). This is located on the main A286 route through the parish, so represents a better location for commercial traffic to access than Hurstfold Industrial Estate which requires access along small country lanes.
- 5.8 The allocation would be on brownfield land, this being part of the existing parking and servicing area of the Business Park. It therefore does not encroach on greenfield land. This is adjacent to

a Biodiversity Action Plan (BAP) area that is also ancient woodland. There are also some priority habitats close to the site. It would therefore be necessary to ensure that any new buildings did not encroach into these areas (which is reflected by the extent of the allocated area) and there was appropriate screening. It would also be necessary to undertake a Phase One Habitat Survey to ascertain the nature of priority habitats.

Other policies

- 5.9 Table 5.1 considers how the Neighbourhood Plan policies address the sustainability objectives of the framework. The score at the end highlights how the policies, on balance, provide an overall positive benefit in addressing the sustainability framework.
- 5.10 The fact that there are no strongly negative overall scores is significant. There are some specific impacts that are considered to be highly negative relating to reducing the need to travel and improvement of pedestrian and cycle networks. However, these are considered to be outweighed by the positive benefits of developing on brownfield land and the associated opportunities that the site allocations bring in terms of economic and social benefits in particular.

Table 5.1: Sustainability Appraisal of Neighbourhood Plan policies

Key: Highly positive ++ Positive + Neutral 0 Negative - Highly negative --

Sustainability Objective	Relevant Neighbourhood Plan objectives	Key sustainability issues	Impact	Commentary and relevant Neighbourhood Plan policies	Overall impact
Protect and enhance wildlife	<ul style="list-style-type: none"> Objective 2: Ensure the most sustainable use of brownfield sites in the parish 	Prevention of biodiversity loss and habitat fragmentation	0	No explicit policies. However, the approach to site allocations (contained in policies SA1-SA4 and EM1) minimises the use of greenfield sites and directly addresses the need to ensure that habitats and the wealth of biodiversity they contain is protected. In particular this relates to existing tree coverage.	0
		Ability of habitats to move with climate change	0	No explicit policies. However, the respective site allocations (SA1-SA4 and EM1) seek to ensure that habitats have the flexibility to adapt to the changing climate as well as the impacts of development and additional population.	
		Enhancement of biodiversity opportunities and creation of new habitat	0	No explicit policies. However, site allocations SA2-SA4 explicitly seek green infrastructure plans that explore the potential to maximise biodiversity opportunities.	
Maximise efficient use of natural resources	<ul style="list-style-type: none"> Objective 2: Ensure the most sustainable use of brownfield sites in the parish 	Protection of water resources	+	No explicit policies. The plan seeks to balance the need to address housing needs with the recognition that this must be done with the least impact on the environment. Policies in respect of housing allocations (SA1-SA4) seek to ensure the highest possible standards of design of new dwellings which will minimise water use and wastage.	+
		Maximise use of waste resources	0	Policy EE1 seeks to encourage the use of on-site renewable energy through local woodchip biomass. However, this is only likely to be viable for larger developments, of which there are few.	

Fernhurst Neighbourhood Plan
Sustainability Appraisal

Sustainability Objective	Relevant Neighbourhood Plan objectives	Key sustainability issues	Impact	Commentary and relevant Neighbourhood Plan policies	Overall impact
		Efficient use of energy, making consumption more sustainable and reducing food miles	+	No explicit policies. The plan seeks to balance the need to address housing needs with the recognition that this must be done with the least impact on the environment. Policies in respect of housing allocations (SA1-SA4) seek to ensure the highest possible standards of design of new dwellings which will maximise energy efficiency.	
Reduce pollution	<ul style="list-style-type: none"> • Objective 2: Ensure the most sustainable use of brownfield sites in the parish. • Objective 3: Provide for the changing needs of businesses and employment within the parish. 	Reduction of air pollution from industrial processes and transport	-	Site allocation SA3 at Hurstfold Industrial Estate will reduce pollution from the existing users on site. However, this will be offset by the increased commercial activity at Syngenta (Policy SA1) and at the Fernhurst Business Park (Policy EM1). There will be an increased in traffic as a result of the housing allocations, SA1-SA4.	-
		Assistance with remediation of contaminated land	+	All of the housing allocations, SA1-SA4 are on brownfield land, so would help towards addressing any contamination issues that arose.	
		Reduction in levels of water pollution	-	No explicit policies.	
Achieve zero net increase in greenhouse gas emissions	<ul style="list-style-type: none"> • Objective 2: Ensure the most sustainable use of brownfield sites in the parish. 	Maximisation of renewable and low carbon energy sources	0	Policy EE1 gives support to developments which propose to use biomass for on-site energy generation. The framework for the housing allocation at Syngenta (Policy SA2) seeks a high quality of building design that minimises energy consumption, with the same principle applying to allocations at Hurstfold (Policy SA3) and Bridgelands (Policy SA4). However, there is no explicit policy addressing this.	-
		Reduction in the need to travel	--	Policy TR1 seeks contributions from development towards bus service improvements.	

Fernhurst Neighbourhood Plan
Sustainability Appraisal

Sustainability Objective	Relevant Neighbourhood Plan objectives	Key sustainability issues	Impact	Commentary and relevant Neighbourhood Plan policies	Overall impact
				However, the location of site allocations SA2-SA4 away from Fernhurst village and its services will serve to increase vehicular journeys.	
		Minimisation of the embodied carbon in goods and buildings	0	The framework for the housing allocation at Syngenta (Policy SA2) is for high quality, energy efficient buildings, with the same principle applying to allocations at Hurstfold (Policy SA3) and Bridgelands (Policy SA4). However, there is no explicit policy addressing this.	
Minimise flood risk for new and existing development	<ul style="list-style-type: none"> Objective 2: Ensure the most sustainable use of brownfield sites in the parish. 	Reduction in the risk of coastal, fluvial surface water and groundwater flooding	+	The allocation of development sites for residential use (Policies SA1-SA4) on brownfield land means no loss of green fields, which in turn provides the best opportunity to minimise flooding. No development sites are near to high risk flood areas (flood zone 3).	0
		Increase in the use of SUDS and provision of opportunities for restoring natural function to river and coastal systems	0	The housing allocation at Syngenta (Policy SA2) seeks to provision of SUDS. However, there are no explicit policies that seek to restore river systems.	
Ensure the district adapts to the effects of climate change	<ul style="list-style-type: none"> Objective 2: Ensure the most sustainable use of brownfield sites in the parish. 	Ensure the district adapts to the effects of climate change	+	Whilst there are no explicit policies addressing this, the site allocations and accompanying policies do not worsen the ability to adapt to climate change. The site allocation policies for Syngenta, Hurstfold and Bridgelands expect buildings to be built to be resilient. Policy EE1 gives support to developments which propose to use biomass for on-site energy generation, a more sustainable energy source than oil and gas.	+

Fernhurst Neighbourhood Plan
Sustainability Appraisal

Sustainability Objective	Relevant Neighbourhood Plan objectives	Key sustainability issues	Impact	Commentary and relevant Neighbourhood Plan policies	Overall impact
Achieve a sustainable and integrated transport system	<ul style="list-style-type: none"> Objective 4: Enhance and provide for the community's infrastructure needs. 	Achieve modal shift to more sustainable forms of transport, integrating bus and train networks	-	Policy TR1 seeks contributions from development towards bus service improvements. However, the location of site allocations at Hurstfold and Bridgelands (Policies SA3-SA4) away from the existing bus route will serve to increase vehicular journeys.	-
		Creation of able networks for cyclists and pedestrians	--	Site allocations at Syngenta, Hurstfold and Bridgelands (Policies SA2-SA4) do not provide for pedestrians and cyclists to be able to access services in Fernhurst village.	
Conserve and enhance landscape and built heritage	<ul style="list-style-type: none"> Objective 2: Ensure the most sustainable use of brownfield sites in the parish. Objective 5: Ensure design of development respects the local vernacular. 	Encourage sustainable land management practices for landscape conservation	+	The site allocations at Syngenta, Hurstfold and Bridgelands (Policies SA2-SA4) require a landscape strategy to be in provided. In the case of the Syngenta allocation (Policy SA2), this must be supported by a green infrastructure strategy, reflecting the adjoining Cooksbridge Meadow Nature Reserve.	+
		Ensure protection of traditional urban forms	+	The design policies (DE1-DE4) seek to provide protection to the existing built environment, particularly in Fernhurst village.	
		Ensure protection of listed buildings, conservation areas and archaeological sites	0	There are no specific policies addressing this but Policy EE2 does seek to address the potential blight caused by the siting of solar panels on buildings within the conservation area.	
Increase availability of affordable housing	<ul style="list-style-type: none"> Objective 1: Address the housing needs of those with a local connection to Fernhurst parish, particularly older and younger people who are unable to access housing 	Meet local housing need	++	Policies H1 and H2 explicitly address this, focusing on the overall quantum of development as well as the mix of both market and affordable housing.	++
		Provide the right housing mix of size and tenure, allowing for the continuation of	++	Policies H1 and H2 explicitly address this, focusing on the overall quantum of development as well as the mix of both market and affordable housing.	

Fernhurst Neighbourhood Plan
Sustainability Appraisal

Sustainability Objective	Relevant Neighbourhood Plan objectives	Key sustainability issues	Impact	Commentary and relevant Neighbourhood Plan policies	Overall impact
	at current market values.	a sustainable mix of people within communities		Policy SC1 also seeks the provision of facilities for specialist care needs, reflecting the aging population.	
		Ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability.	++	Policies H1 and H2 explicitly address this, focusing on the overall quantum of development as well as the mix of both market and affordable housing. Site allocations SA1-4 reflect the opportunities provided by available sites for redevelopment. The siting of these allocations on brownfield land (so providing the potential to remediate contaminated sites), coupled with the focus on the highest standards of design, helps to maximise environmental sustainability.	
Provide access to services and facilities	<ul style="list-style-type: none"> • Objective 3: Provide for the changing needs of businesses and employment within the parish. • Objective 4: Enhance and provide for the community's infrastructure needs. 	Improve access to services and facilities	0	<p>The relocation of some commercial businesses within or close to Fernhurst village as a result of Policy SA3 (Hurstfold) could provide some local services in a better location, e.g. Syngenta or Fernhurst Business Park.</p> <p>Policy CF2 seeks the provision of new allotments.</p> <p>Policy CF3 seeks improvement to existing community facilities. This will enable the expansion of these facilities so they can be enjoyed by a larger proportion of the community.</p> <p>Policy TR1 seeks contributions towards improving the existing bus services.</p> <p>However, site allocations at Syngenta, Hurstfold and Bridgelands (Policies SA2-SA4) are not close to existing services, albeit that services in Fernhurst are limited.</p>	0
Improve community safety	<ul style="list-style-type: none"> • Objective 4: Enhance and provide for the community's infrastructure 	Improve community safety	-	<p>Policy TR2 seeks the provision of traffic calming measures within Fernhurst village.</p> <p>However, site allocations at Syngenta, Hurstfold and Bridgelands</p>	-

Fernhurst Neighbourhood Plan
Sustainability Appraisal

Sustainability Objective	Relevant Neighbourhood Plan objectives	Key sustainability issues	Impact	Commentary and relevant Neighbourhood Plan policies	Overall impact
	needs.			(Policies SA2-SA4) are away from Fernhurst village and do not provide direct pedestrian/dedicated cycle routes.	
Promote economic development to maintain quality of life and competitiveness	<ul style="list-style-type: none"> • Objective 1: Address the housing needs of those with a local connection to Fernhurst parish, particularly older and younger people who are unable to access housing at current market values. • Objective 3: Provide for the changing needs of businesses and employment within the parish. • Objective 4: Enhance and provide for the community's infrastructure needs. • Objective 5: Ensure design of development respects the local vernacular. • Objective 6: Protect and enhance Fernhurst parish's role in the South Downs National Park, including as a tourist destination. 	Deliver improved quality of life for all	++	<p>Policies H1 and H2 explicitly address this, focusing on the overall quantum of development as well as the mix of both market and affordable housing.</p> <p>The employment policies seek to enhance employment opportunities, flexible working and training provision within Fernhurst.</p> <p>The transport policies seek to improve access to employment opportunities.</p> <p>The policies seeking improvement to community facilities reflect the importance of such facilities to quality of life.</p>	+
		Improve the health and well-being of the population and reduce inequalities in health and well-being	++	<p>Policy CF2 seeks the provision of new allotments to help with self-sufficiency.</p> <p>Policies H1 and H2 explicitly address the need to improve the wellbeing of the population, focusing on provision to address local needs and mix of both market and affordable housing.</p> <p>Policy SC1 also seeks the provision of facilities for specialist care needs, reflecting the aging population.</p>	
		Create and sustain vibrant communities which recognise the needs and contributions of all individuals	++	<p>Policies H1-H3 explicitly address the need to improve the wellbeing of the population, focusing on provision to address local needs and mix of both market and affordable housing.</p> <p>The employment policies seek to enhance employment opportunities, flexible working and training provision within Fernhurst.</p> <p>The transport policies seek to improve access to employment opportunities.</p>	

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Sustainability Objective	Relevant Neighbourhood Plan objectives	Key sustainability issues	Impact	Commentary and relevant Neighbourhood Plan policies	Overall impact
				The policies seeking improvement to community facilities reflect the importance of such facilities to quality of life.	
		Ensure that economic opportunities are accessible to all	+	The employment policies seek to enhance employment opportunities and flexible working. In particular, Policy EM6 seeks to enhance training for employment skills within Fernhurst. The relocation of businesses at Hurstfold Industrial Estate (Policy SA3) to either Syngetna or Fernhurst Business Park means that the main employment opportunities are more focused on main route through Fernhurst, along the A286.	
		Ensure that value added is retained in the District	0	Policy SA3 at Hurstfold seeks to retain local businesses within Fernhurst. Policy SA2 at Syngenta recognises the needs of on the major businesses in Fernhurst – Aspinal of London – and seeks to provide for it. The policy also seeks to ensure that Syngenta becomes a location that helps the National Park as a tourism attractor (as does Policy EM4 which seeks tourism employment opportunities).	
Develop a dynamic diverse and knowledge based economy that excels in innovation with higher value, lower impact activities	<ul style="list-style-type: none"> Objective 3: Provide for the changing needs of businesses and employment within the parish. 	Encourage innovation	+	Polices EM2 (micro-businesses) and EM3 (live-work) both seek to provide flexibility to small businesses. Policy EM5 on the provision of broadband seeks to improve modern business infrastructure in the parish.	0
		Develop knowledge based economy locally	0	Polices EM2 (micro-businesses) and EM3 (live-work) both seek to help the modern commercial sectors thrive in Fernhurst. Policy EM5 seeks to ensure that the broadband networks are enhanced. However, overall the direct development of the knowledge economy is limited.	

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Sustainability Objective	Relevant Neighbourhood Plan objectives	Key sustainability issues	Impact	Commentary and relevant Neighbourhood Plan policies	Overall impact
Develop and maintain a skilled workforce to support long-term competitiveness	<ul style="list-style-type: none"> Objective 1: Address the housing needs of those with a local connection to Fernhurst parish, particularly older and younger people who are unable to access housing at current market values. Objective 3: Provide for the changing needs of businesses and employment within the parish. 	Ensure skills are enhanced to increase access to work	0	<p>Policy EM6 seeks to enhance training for employment skills within Fernhurst.</p> <p>Policy SA2 for Syngenta seeks to allow existing businesses such as Aspinal of London to expand.</p> <p>Overall, the direct addressing of skills issues is not significant.</p>	0
		Ensure a skilled workforce is available locally to allow business developments	0	<p>Policy EM6 seeks to enhance training for employment skills within Fernhurst.</p> <p>Policy SA2 for Syngenta seeks to allow existing businesses such as Aspinal of London to expand.</p> <p>Overall, the direct addressing of the skills base of the workforce is not significant.</p>	
Enable viability of the rural economy with enhanced diversity of employment opportunities	<ul style="list-style-type: none"> Objective 3: Provide for the changing needs of businesses and employment within the parish. Objective 6: Protect and enhance Fernhurst parish's role in the South Downs National Park, including as a tourist destination. 	Promote a prosperous and diverse rural economy	0	<p>Policy EM4 seeks to ensure that opportunities for new tourism employment are taken within the parish.</p> <p>However, there are no policies that directly address the needs of the traditional rural economy as agriculture is not seen as major part of the local economy in Fernhurst anymore.</p>	+
		Promote sustainable tourism	+	<p>Policy EM4 seeks to ensure that opportunities for new tourism employment are taken within the parish.</p> <p>Policy SA2 for Syngenta does look for the provision of a tourist and visitor information centre, this being a gateway into the National Park, with easy immediate access to walking routes, etc.</p>	

++ Highly positive + Positive 0 Neutral - Negative -- Highly negative

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OVERALL IMPACT SCORE	1	++
	5	+
	5	0
	4	-
	0	--

6 ASSESSMENT OF SUSTAINABILITY OF SITE-BASED APPROACH AND POLICIES

Approach to deriving preferred spatial strategy for housing allocations

- 6.1 In the Fernhurst Neighbourhood Plan process, the starting point for deriving the preferred spatial strategy for allocating housing sites was the National Planning Policy Framework (NPPF). This identifies that there are three aspects to sustainability – social, economic and environmental – and that there is a need for the planning system to perform a number of roles:
- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
 - **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 6.2 It is important to consider the relative balance between each of these roles and whether the resultant mix represents a sustainable approach.
- 6.3 The initial engagement with the community made clear that it considered the site allocations should adhere to certain local priorities. Principally this was that the character of a village in a National Park and in an Area of Outstanding Natural Beauty should be protected and retained. Therefore the approach must be to use brownfield sites within the built-up area first. If insufficient sites were identified, then the search should be widened to consider brownfield sites outside the built-up area.
- 6.4 This information was gleaned from a number of engagement activities:
- The initial launch event of the Neighbourhood Plan in April 2012.
 - The extensive questionnaire survey which was given to every adult member of the community to complete:
 - The survey looked at a range of topics covering social, economic and environmental sustainability, including housing needs, employment, transport, landscape and environment, leisure and social cohesion.
 - 87% of respondents said that new housing should be developed on previously developed land.
 - Only 3% of respondents said that new housing should be developed on green fields on the periphery of Fernhurst village.
 - Only 6% of respondents said that new housing should be developed on green fields within Fernhurst village.

- Only 18% of respondents said that ribbon development along the A286 outside Fernhurst village should be permitted.
 - A public meeting to present the findings of the questionnaire survey in September 2012.
 - A public housing workshop to discuss housing needs and locations held in October 2012.
- 6.5 From this evidence, it was apparent that a 'brownfield-first' approach should be considered, with the initial site search restricted to brownfield sites within the built-up areas (principally Fernhurst village). As a result of this search, one small site was identified – the Oil Depot site on Midhurst Road. Based on the housing needs evidence gathered to inform the housing policies, it was clear that additional sites would be needed in order to address Fernhurst's objectively assessed needs.
- 6.6 Other brownfield sites were identified outside the village:
- The former Syngenta site, Midhurst Road
 - Hurstfold Industrial Estate, Surney Hatch Lane
 - Bridgelands site, Verdley Place
- 6.7 In order to consider the alternative approach to brownfield sites away from the village, greenfield sites on the edge of the village were assessed. These came from two sources:
- The Chichester Strategic Housing Land Availability Assessment (SHLAA). Four sites were identified:
 - Land on the upper Glebe
 - Bennetts Field, Hawksfold Lane East
 - Northern section of Lower Nappers Farm
 - Land south east of Midhurst Road
 - A review of all other land and sites around Fernhurst, even though they had not been submitted to the SHLAA. However, no areas were considered to be available, suitable and deliverable. Mostly this was because the sites were not available (with some being in an alternative active use) or they were known to have restrictive covenants on them. Other sites were undevelopable because there was no access
- 6.8 It was therefore considered that the approach of allocating a single brownfield site within the built up area of Fernhurst village and three further brownfield sites outside the built up area represented a sustainable approach – reflecting the community's aspirations - to delivering Fernhurst's objectively assessed housing needs. This brownfield first approach, with reference to the specific locations, has been assessed against the approach of using greenfield sites around the village.
- 6.9 Table 6.1 shows the assessment against the sustainability framework of the brownfield approach versus the greenfield approach. The individual assessments of the four site allocations (Policies SA1-SA4) are shown in Appendix A.
- 6.10 Overall, the scores at the end of Table 6.1 show that the brownfield approach, when assessed against the sustainability framework, provides positive sustainability benefits.

Table 6.1: SA assessment of brownfield versus greenfield approach to housing site allocations

Key: Highly positive ++ Positive + Neutral 0 Negative - Highly negative --

SA Objective	SA Assessment Criteria	Brownfield sites in parish		Greenfield sites around Fernhurst village	
1) Protect and enhance wildlife	Does the option prevent biodiversity loss and habitat fragmentation?	+	Brownfield sites with no known protected species or habitats.	-	Potential to result in loss of species although none are protected species.
	Does the option allow for movement of habitats with climate change?	+	Potential to improve by opening up green corridors and access.	0	Limited effects on ecology expected but site development does not create opportunity for movement.
	Does the option enhance biodiversity opportunities and create new habitat?	+	Creation of green spaces within site does create opportunity for new habitats.	+	Potential for creation of green spaces within sites does create opportunity for new habitats.
2) Maximise efficient use of natural resources	Does the option protect water resources?	0	Unlikely to have significant impacts due to proximity of a limited number of watercourses.	0	No impact
	Does the option maximise use of waste resources?	-	More households means more waste.	-	More households means more waste.
	Does the option make efficient use of energy, make consumption more sustainable and reduce food miles?	0	High quality development would be sought, part of which is energy efficient buildings. But no on-site generation of energy or food.	0	High quality development would be sought, part of which is energy efficient buildings. But no on-site generation of energy or food.
3) Reduce pollution	Does the option reduce air pollution from industrial processes and transport?	-	Some possible additional industrial activity although some sites will result in loss of industrial activities. Additional car borne traffic created by new residents.	0	No impact
	Will the option assist the remediation of contaminated land?	+	Site is brownfield so potentially if contaminated.	-	Greenfield sites so no remediation of brownfield land
	Does the option reduce levels of water pollution?	0	No impacts expected.	0	No impacts expected.
4) Achieve zero net increase in greenhouse gas	Does the option maximise the use of renewable and low carbon energy sources	+	High quality development would be sought, part of which is energy efficient buildings.	+	High quality development would be sought, part of which is energy efficient buildings.

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SA Objective	SA Assessment Criteria	Brownfield sites in parish		Greenfield sites around Fernhurst village	
emissions	Does the option reduce the need to travel?	-	No basic services would be provided on site.	++	Close to centre of village so close to all services.
	Does the option minimise the embodied carbon in goods and buildings?	+	High quality development would be sought, part of which is energy efficient buildings.	+	High quality development would be sought, part of which is energy efficient buildings.
5) Minimise flood risk for new and existing development	Does the option reduce the risk of coastal, fluvial surface water and groundwater flooding?	++	In a low flood risk area.	++	In a low flood risk area.
	Does the option increase the use of SUDS and provide opportunities for restoring natural function to river and coastal systems?	+	Larger sites would enable the potential to develop SUDS.	0	Size of sites would mean SUDS provision unlikely
6) Ensure the district adapts to the effects of climate change	Does the option ensure the district adapts to the effects of climate change?	+	Larger sites would enable the potential to develop mitigation measures (SUDS, tree planting, green infrastructure).	+	Size of the sites would enable the potential to develop mitigation measures (tree planting, green infrastructure).
7) Achieve a sustainable and integrated transport system	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	--	Very limited access to bus services and no pedestrian and cycle access into village.	++	Bus service passes close to sites and locations near to centre of village enable pedestrian access to all services.
	Does the option create able networks for cyclists and pedestrians?	--	No pedestrian and cycle access into village.	0	Unlikely to be able to create new network of cycle routes or pedestrian paths.
8) Conserve and enhance landscape and built heritage	Does the option encourage sustainable land management practices for landscape conservation?	+	Sites could be screened and enhanced in landscape terms.	+	Sites could be screened and enhanced in landscape terms.
	Does the option ensure protection of traditional urban forms?	0	No impact on views of existing built-up areas.	-	High potential for negative impact on views into and out of village.
	Does the option ensure protection of listed buildings, conservation areas and	0	Unlikely to affect listed buildings or conservation area but archaeological impacts unknown.	-	Potential impact on conservation area and listed buildings of some sites but archaeological impacts unknown.

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SA Objective	SA Assessment Criteria	Brownfield sites in parish		Greenfield sites around Fernhurst village	
	archaeological sites?				
9) Increase availability of affordable housing	Does the option meet local housing need?	++	Provides for a range of local housing needs, based on the mix and tenure.	+	Provides for a range of local housing needs, based on the mix and tenure.
	Does the option provide the right housing mix of size and tenure, allowing for the continuation of sustainable mix of people within communities?	++	It is a large site so the mix sought is based on the overall need of the parish and the wider SHMA sub-area.	+	The mix sought is based on the overall need of the parish and the wider SHMA sub-area.
	Does the option ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability.	++	The mix of sizes and tenures seeks to address a wide range of needs.	+	The mix of sizes and tenures seeks to address a range of needs.
10) Provide access to services and facilities	Does the option improve access to services and facilities?	-	The sites are remote from the village although this has limited services.	++	Locations close to centre of village provides easy access to all services.
11) Improve community safety	Does the option improve community safety?	+	The site would be designed to ensure safe access.	-	The sites will create more pedestrians having to access services along busy main road.
12) Promote economic development to maintain quality of life and competitiveness	Does the option deliver improved quality of life for all?	+	Residents will have good access to jobs, countryside and larger settlement of Midhurst.	+	Residents will have access to jobs and larger settlements of Midhurst and Haslemere, as well as local services in the village.
	Does the option improve the health and well-being of the population and reduce inequalities in health and well-being?	++	The provision of a range of tenures and mix of housing ensures greater prospects of securing housing for local people in need.	+	The provision of a range of tenures and mix of housing ensures greater prospects of securing housing for local people in need.
	Does the option create and sustain vibrant communities which recognise the needs and contributions of all individuals?	0	It will provide a range and choice of housing and jobs but is remote from basic services.	+	It will provide a range and choice of housing and is remote from basic services.
	Does the option ensure that economic opportunities are	+	There will some employment provided on one of the sites	-	No employment opportunities will be provided on site.

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SA Objective	SA Assessment Criteria	Brownfield sites in parish		Greenfield sites around Fernhurst village	
	accessible to all?				
	Does the option ensure that value added is retained in the District?	+	One of the sites could provide for relocated businesses from the Hurstfold site which provide for local needs.	0	The site will not create any value added.
13) Develop a dynamic diverse and knowledge based economy that excels in innovation with higher value, lower impact activities	Does the option encourage innovation?	0	The employment space provided on one of the sites will offer limited opportunities to new start-up businesses.	0	No employment opportunities will be provided on site.
	Does the option develop knowledge based economy locally?	0	The employment space provided on one of the sites will offer limited opportunities to knowledge-based businesses.	0	No commercial space will be provided on site.
14) To develop and maintain a skilled workforce to support long-term competitiveness	Does the option ensure skills are enhanced to increase access to works?	+	There will be a range of jobs provided on one of the sites, although this is partly offset by loss of jobs on one of the other sites.	0	No employment opportunities will be provided on site.
	Does the option ensure a skilled workforce is available locally to allow business developments?	+	It will provide a range of new housing that will be accessible to large sections of the workforce.	0	No employment opportunities will be provided on site.
15) Enable viability of the rural economy with enhanced diversity of employment opportunities	Does the option promote a prosperous and diverse rural economy?	-	There are no opportunities to address the needs of the rural economy.	-	There are no opportunities to address the needs of the rural economy.
	Does the option promote sustainable tourism?	+	Opportunities are available for National Park-related activities to occur on one of the sites.	-	There are no opportunities to address tourism opportunities.

++ Highly positive + Positive 0 Neutral - Negative -- Highly negative

SCORE					
	++	5		++	4
	+	16		+	11
	0	8		0	12
	-	5		-	9
	--	2		--	0

Impact of housing allocations

- 6.11 Overall, the sustainability assessment under the appraisal framework shows that the approach of allocating brownfield sites has significantly more positive than negative impacts.
- 6.12 By comparison to the alternative approach considered of allocating greenfield sites around Fernhurst village (an approach that the community strongly resisted in the development on the Neighbourhood Plan), it shows slightly more positive net benefits.
- 6.13 The highly negative impacts of the 'brownfield first' approach relate to the limited accessibility by non-car modes, although the disproportionately largest allocation at Syngenta (Policy SA2) is on a main bus route to Fernhurst and to Haslemere to the north and Midhurst to the south. However, it is of note that this bus service has been under threat of being reduced because of the lack of users, even though it goes through Fernhurst village.
- 6.14 The two next largest allocations (at Hurstfold – Policy SA3 – and Bridgelands – Policy SA4), whilst being in more remote locations, are serving particular housing needs. Both are expected to provide principally for the needs of those seeking intermediate tenure properties. Such people have a greater chance of having access to a car, so will not be impacted so much by living in a more remote location as those without access to a car. In a rural location in a National Park, if it is accepted that new development must be delivered in order to address the housing needs of the population, then it must be accepted that this will require some form of access to a car in many cases. As identified above, cuts to public transport, which is already limited in its ability to serve the employment and leisure needs of people, make it unrealistic to expect anything other than a significant minority of the population to not have access to a car. In Fernhurst parish, 91% of households had access to at least one car in 2011, or an average of 1.65 cars per household. This compares to 84% with access to at least one car in Chichester district (1.44 cars per household). The national average is 74% with access to at least one (1.16 cars per household)⁷.
- 6.15 Factors such as these in rural locations are important in balancing the sustainability merits of different sites. Another consideration is that Fernhurst village does not serve any more than very basic needs for convenience shopping. There is no convenience store and as a result, residents have to travel to Haslemere and Midhurst to undertake their food shopping. Therefore it is inevitable that allocating sites for residential development in a rural location such as Fernhurst will create additional car journeys.

Habitats

- 6.16 The SA evaluation has identified the need to ensure that detailed habitat assessments are undertaken as part of any planning applications. As a result, the policies for the three housing allocations outside Fernhurst village (Policies SA2-SA4) and the employment allocation at Fernhurst Business Park (Policy EM1) have been amended to reflect the need for Phase One Habitat Studies to be undertaken.

Wildlife sites

Cooksbridge Meadow

- 6.17 One of the potentially most significant impacts of development at the Syngenta site is on the adjacent Cooksbridge Meadow Nature Reserve. In seeking to understand the nature and extent

⁷ Source: 2011 Census

of these issues, we have engaged with the Sussex Wildlife Trust (SWT) which owns and manages the site. The principle comment provided by the SWT is of the importance of linking up existing and proposed green spaces for the benefit of people and wildlife:

"The Sussex Wildlife Trust would like to see neighbourhood plans include policies that encourage the linking up of existing and proposed green spaces for the benefit of people and wildlife. In particular we would be encouraged to see policies that require developers produce Green Infrastructure Plans as part of their proposals. This would bring plans in line with paragraphs 117 and 118 of the NPPF:

'To minimise impacts on biodiversity and geodiversity planning policies should identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration and creation.'

'Opportunities to incorporate biodiversity in and around developments should be encouraged'

Paragraph 114 of the NPPF encourages Local Authorities to ensure that they 'Set out a strategic approach in their Local plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure' and the policies within neighbourhood plans can contribute to this.

- 6.18 As a result of these comments, it was considered appropriate to add in to the site allocation policies the requirement to produce a Green Infrastructure Plan which demonstrates how any development proposals on those sites will actively link up green spaces for the benefit of people and wildlife. Specific reference is made in the policy on Syngenta (Policy SA2) to the need to engage with SWT in drawing up these plans.
- 6.19 There are other specific impacts which could arise as a result of development. The principal one is the increased human activity of visitors, particularly dog walkers, using the site for recreational purposes. This will increase the pressure on the environment.
- 6.20 It will therefore be important that proposals fully consider this and can provide alternative routes for recreational use so that, whilst activity will increase, there will be other alternative so overall the increase will be minimised. One particular solution is to ensure that access points to Cooksbridge Meadow directly from the Syngenta site are carefully considered in terms of their number and location. This has been reflected in the Syngenta policy.
- 6.21 Landscaping is also an issue, as raised by SWT:

"...appropriate landscaping within all aspects of a development can help reduce fragmentation of habitats and help to retain and enhance biodiversity features. Landscaping areas will be of most benefit to wildlife where native species are used and landscaping should, wherever possible, link up areas supporting biodiversity.

... increased recreational pressure can have a negative impact on biodiversity. Buffering of biodiversity features from areas of high human

activity, such as roads, residential development or play areas can help to reduce impacts.”

- 6.22 The Syngenta policy ensures that the mature treeline that surrounds the site on most of the northern, eastern and western sides is retained. This dense treeline separates the site from the Cooksbridge Meadow reserve and other surrounding open areas. Development is directly as far away from this existing landscaping as possible. This also addresses identified concerns of SWT regarding the impact of noise and lighting from development on the nature reserve.

Cumulative impacts of housing development

- 6.23 Just outside the parish boundary to the south is the former King Edward VII Hospital site ('KEVII') which has commenced a development providing 409 new dwellings. In total with the Syngenta site, this will provide up to 560 new dwellings. It is important that the cumulative impacts are understood.
- 6.24 The principle impacts will be in terms of additional car traffic and on health and education services.
- 6.25 The assessment of car traffic accompanying the KEVII application considered that it would not have any significant impacts and there was no specific mitigation required. In respect of Syngenta, the additional car traffic will be proportionately less and it must be considered that, when ICI were operating the facility, there were approximately 800 workers there, most of whom accessed the site by car. The impacts when compared to this will be much lower.
- 6.26 The existing GP surgery does not open all day for five days a week at present. With the additional patients that these new developments will bring, it may enable full opening hours of the surgery which will benefit the existing residents of Fernhurst.
- 6.27 In terms of education needs, West Sussex County Council (WSSCC) has stated that most children at the KEVII development would go to Easebourne Primary School because it is within its catchment. This school has recently expanded and now has the capacity to accommodate these needs. In respect of development at Syngenta, WSSCC informed the Neighbourhood Plan that the child yield from up to 250 dwellings could reasonably be accommodated within the existing school system.

7 OVERALL SUMMARY ASSESSMENT

- 7.1 Overall the Neighbourhood Plan has a good performance on sustainability issues. There are no significant areas where sustainability has not been addressed. The appraisal framework has highlighted the need to provide an appropriate green infrastructure strategy on site allocations and the need for habitats surveys on some of these allocations. This has been reflected in the Neighbourhood Plan accordingly.

Appendix A Sustainability assessment of site allocations SA1-SA4

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Environmental Assessment

Key: Highly positive ++ Positive + Neutral 0 Negative - Highly negative --

SA Objective	SA Assessment Criteria	Syngenta		Hurstfold		Bridgelands		Former oil depot	
1) Protect and enhance wildlife	Does the option prevent biodiversity loss and habitat fragmentation?	+	Brownfield site with no known protected species or habitats. Potential effects on Cooksbridge wildlife site due to additional users.	+	Brownfield site with no known protected species or habitats.	+	Brownfield site with no known protected species or habitats.	+	Brownfield site with no known protected species or habitats.
	Does the option allow for movement of habitats with climate change?	+	Potential to improve by opening up green corridors and access.	0	Limited opportunities	0	Limited opportunities	0	Limited opportunities
	Does the option enhance biodiversity opportunities and create new habitat?	+	Creation of green spaces within site does create opportunity for new habitats.	+	Limited opportunities although density of development ensures there will be significant open space	+	Retention of green spaces within site does create opportunity for new habitats.	0	Limited opportunities
2) Maximise efficient use of natural resources	Does the option protect water resources?	-	Potential impacts on stream on western boundary.	0	No impact	0	No impact	0	No impact
	Does the option maximise use of waste resources?	-	More households means more waste.	-	More households means more waste.	-	More households means more waste.	-	More households means more waste.
	Does the option make efficient use of energy, make consumption more sustainable and reduce food miles?	0	High quality development would be sought, part of which is energy efficient buildings. But no on-site generation of energy or food.	0	High quality development would be sought, part of which is energy efficient buildings. But no on-site generation of energy or food.	0	High quality development would be sought, part of which is energy efficient buildings. But no on-site generation of energy or food.	0	High quality development would be sought, part of which is energy efficient buildings. But no on-site generation of energy or food.
3) Reduce pollution	Does the option reduce air pollution from industrial processes and transport?	-	Some possible additional industrial activity, although unlikely to be heavy. Additional car	+	Current industrial activities will cease on the site. Limited transport impacts created by new	0	No impact	+	Current industrial activities will cease on the site. Limited transport impacts

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SA Objective	SA Assessment Criteria	Syngenta		Hurstfold		Bridgelands		Former oil depot	
			bourne traffic created by new residents.		housing.				created by new housing.
	Will the option assist the remediation of contaminated land?	+	Site is brownfield so potentially if contaminated.	+	Site is brownfield so potentially if contaminated.	+	Site is brownfield so potentially if contaminated.	+	Site is brownfield so potentially if contaminated.
	Does the option reduce levels of water pollution?	-	Possibly in respect of adjacent stream	0	No impact	0	No impact	0	No impact
4) Achieve zero net increase in greenhouse gas emissions	Does the option maximise the use of renewable and low carbon energy sources	+	High quality development would be sought, part of which is energy efficient buildings.	+	High quality development would be sought, part of which is energy efficient buildings.	+	High quality development would be sought, part of which is energy efficient buildings.	+	High quality development would be sought, part of which is energy efficient buildings.
	Does the option reduce the need to travel?	-	No basic services would be provided on site.	-	No basic services would be provided on site.	-	No basic services would be provided on site.	++	Local in centre of village is close to all services.
	Does the option minimise the embodied carbon in goods and buildings?	+	High quality development would be sought, part of which is energy efficient buildings.	+	High quality development would be sought, part of which is energy efficient buildings.	+	High quality development would be sought, part of which is energy efficient buildings.	+	High quality development would be sought, part of which is energy efficient buildings.
5) Minimise flood risk for new and existing development	Does the option reduce the risk of coastal, fluvial surface water and groundwater flooding?	++	In a low flood risk area.	++	In a low flood risk area.	++	In a low flood risk area.	++	In a low flood risk area.
	Does the option increase the use of SUDS and provide opportunities for restoring natural function to river and coastal systems?	+	Size of the site would enable the potential to develop SUDS.	0	Size of site would mean SUDS provision unlikely	0	Size of site would mean SUDS provision unlikely	0	Size of site would mean SUDS provision unlikely
6) Ensure the district adapts to the effects of climate change	Does the option ensure the district adapts to the effects of climate change?	+	Size of the site would enable the potential to develop mitigation measures (SUDS, tree planting, green infrastructure).	+	Site could provide some limited mitigation measures, such as tree planting, but unlikely to be significant.	+	Size of the site would enable the potential to develop mitigation measures (tree planting, green infrastructure).	0	No potential to develop mitigation measures.

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SA Objective	SA Assessment Criteria	Syngenta		Hurstfold		Bridgelands		Former oil depot	
7) Achieve a sustainable and integrated transport system	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	-	Bus service passing the site but limited pedestrian and cycle access into village.	--	No bus service passing the site and no pedestrian and cycle access into village.	--	No bus service passing the site and no pedestrian and cycle access into village.	++	Bus service passes site and location in centre of village enables pedestrian access to all services.
	Does the option create able networks for cyclists and pedestrians?	-	Limited pedestrian and cycle access into village.	--	No pedestrian and cycle access into village.	--	No pedestrian and cycle access into village.	+	Location in centre of village enables pedestrian access to all services.
8) Conserve and enhance landscape and built heritage	Does the option encourage sustainable land management practices for landscape conservation?	+	Site could be screened and enhanced in landscape terms.	+	Site could be screened and enhanced in landscape terms.	+	Site could be screened and enhanced in landscape terms.	0	None on brownfield site in village centre.
	Does the option ensure protection of traditional urban forms?	0	No impact on views of existing built-up areas.	0	No impact on views of existing built-up areas.	0	No impact on views of existing built-up areas.	+	Development would have to be in keeping with density and design of existing buildings in village.
	Does the option ensure protection of listed buildings, conservation areas and archaeological sites?	0	Does not affect nearby listed building or any conservation area but archaeological impacts unknown.	0	No impact on listed buildings or conservation areas but archaeological impacts unknown.	0	No impact on listed buildings or conservation areas but archaeological impacts unknown.	0	No impact on listed buildings or conservation areas but archaeological impacts unknown.
9) Increase availability of affordable housing	Does the option meet local housing need?	++	Provides for a range of local housing needs, based on the mix and tenure.	++	Provides for a range of local housing needs, based on the mix and tenure.	++	Provides for a range of local housing needs, based on the mix and tenure.	+	Provides for a range of local housing needs, based on the mix and tenure.
	Does the option provide the right housing mix of size and tenure, allowing for the continuation of sustainable mix of people within communities?	++	It is a large site so the mix sought is based on the overall need of the parish and the wider SHMA sub-area.	+	The mix sought is based on the overall need of the parish and the wider SHMA sub-area.	+	The mix sought is based on the overall need of the parish and the wider SHMA sub-area.	+	The mix sought is based on the overall need of the parish and the wider SHMA sub-area.
	Does the option ensure that everyone has the	++	The mix of sizes and tenures seeks to address	+	The mix of sizes and tenures seeks to address	+	The mix of sizes and tenures seeks to address	+	The mix of sizes and tenures seeks to address

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	opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability.		a wide range of needs.		a range of needs.		a range of needs.		a range of needs.
10) Provide access to services and facilities	Does the option improve access to services and facilities?	-	The site is remote from the village although this has limited services.	-	The site is remote from the village although this has limited services.	-	The site is remote from the village although this has limited services.	++	Location in centre of village provides easy access to all services.
11) Improve community safety	Does the option improve community safety?	+	The site would be designed to ensure safe access.	+	The site would be designed to ensure safe access.	+	The site would be designed to ensure safe access.	-	The site is on a busy main road.
12) Promote economic development to maintain quality of life and competitiveness	Does the option deliver improved quality of life for all?	+	Residents will have good access to jobs, countryside and larger settlement of Midhurst.	+	Residents will have good access to jobs, countryside and larger settlement of Midhurst.	+	Residents will have good access to jobs, countryside and larger settlement of Midhurst.	+	Residents will have access to jobs and larger settlements of Midhurst and Haslemere, as well as local services in the village.
	Does the option improve the health and well-being of the population and reduce inequalities in health and well-being?	++	The provision of a range of tenures and mix of housing ensures greater prospects of securing housing for local people in need.	+	The provision of a range of tenures and mix of housing ensures greater prospects of securing housing for local people in need.	+	The provision of a range of tenures and mix of housing ensures greater prospects of securing housing for local people in need.	+	The provision of a range of tenures and mix of housing ensures greater prospects of securing housing for local people in need.
	Does the option create and sustain vibrant communities which recognise the needs and contributions of all individuals?	0	It will provide a range and choice of housing and jobs but is remote from basic services.	+	It will provide a range and choice of housing but is remote from basic services.	+	It will provide a range and choice of housing but is remote from basic services.	+	It will provide a range and choice of housing and is remote from basic services.
	Does the option ensure that economic opportunities are accessible to all?	+	There will be a range of jobs provided on the site	-	No employment opportunities will be provided on site.	-	No employment opportunities will be provided on site.	-	No employment opportunities will be provided on site.

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	Does the option ensure that value added is retained in the District?	+	The site could provide for relocated businesses from the Hurstfold site which provide for local needs.	0	The site will not create any value added.	0	The site will not create any value added.	0	The site will not create any value added.
13) Develop a dynamic diverse and knowledge based economy that excels in innovation with higher value, lower impact activities	Does the option encourage innovation?	0	The employment space provided will offer limited opportunities to new start-up businesses.	0	No employment opportunities will be provided on site.	0	No employment opportunities will be provided on site.	0	No employment opportunities will be provided on site.
	Does the option develop knowledge based economy locally?	0	The employment space provided will offer limited opportunities to knowledge-based businesses.	0	No commercial space will be provided on site.	0	No commercial space will be provided on site.	0	No commercial space will be provided on site.
14) To develop and maintain a skilled workforce to support long-term competitiveness	Does the option ensure skills are enhanced to increase access to works?	+	There will be a range of jobs provided on the site.	0	No employment opportunities will be provided on site.	0	No employment opportunities will be provided on site.	0	No employment opportunities will be provided on site.
	Does the option ensure a skilled workforce is available locally to allow business developments?	+	It will provide a range of new housing that will be accessible to large sections of the workforce.	0	No employment opportunities will be provided on site.	0	No employment opportunities will be provided on site.	0	No employment opportunities will be provided on site.
15) Enable viability of the rural economy with enhanced diversity of employment opportunities	Does the option promote a prosperous and diverse rural economy?	-	There are no opportunities to address the needs of the rural economy.	-	There are no opportunities to address the needs of the rural economy.	-	There are no opportunities to address the needs of the rural economy.	-	There are no opportunities to address the needs of the rural economy.
	Does the option promote sustainable tourism?	+	Opportunities are available for National Park-related activities to occur on-site.	-	There are no opportunities to address tourism opportunities.	-	There are no opportunities to address tourism opportunities.	-	There are no opportunities to address tourism opportunities.

Fernhurst Neighbourhood Plan
Environmental Assessment

SCORE

Syngenta

++	5
+	16
0	6
-	9
--	0

Hurstfold

++	2
+	14
0	12
-	6
--	2

Bridgelands

++	2
+	13
0	13
-	6
--	2

Former Oil Depot

++	4
+	13
0	14
-	5
--	0