# Petworth Neighbourhood Plan: Submission Draft

# Sustainability Appraisal

Incorporating Strategic Environmental Assessment

July 2017



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### **Non-Technical Summary**

This is a Sustainability Appraisal (SA) of the Submission Draft Version (July 2017) of the Petworth Neighbourhood Plan. The Neighbourhood Plan will set out a vision for the future of the area to 2033, providing a strategy to manage improvements and a land use framework for development. If supported at referendum, the Neighbourhood Plan will gain statutory status and form part of the adopted Development Plan.

A Neighbourhood Plan must meet a number of basic conditions set out within the Localism Act 2011. These basic conditions include the requirement that the making of the Neighbourhood Plan does not breach, and is otherwise compatible with EU obligations. Where a Neighbourhood Plan could have significant environmental effects, it may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and therefore require a Strategic Environmental Assessment (SEA).

A Habitats Regulation Assessment (HRA) for the emerging South Downs National Park Local Plan has been undertaken by the South Downs National Park Authority. Through the HRA, consideration of the potential impacts of the level of development at Petworth over the period up to 2033 has been undertaken. The emerging South Downs National Park Local Plan requires the delivery of approximately 150 additional new homes and 1.4 hectares of new employment land at Petworth. The HRA concludes that there would be no likely significant effects on sites of European habitats or species as defined under the European Union's Habitats Directive 92/43/EED.

A SA extends the concept of SEA as a process through which to assess the environmental as well as social and economic impacts of a policy, plan or programme and it's likely contribution to the delivery of sustainable development overall. The SA fully incorporates the requirements of the SEA Directive.

Consultation on the SA Scoping Report was undertaken in February 2016. The SA Scoping Report set out the intended scope of, and methodology for, appraising the Neighbourhood Plan. Feedback from this consultation has been taken account of, and the evidence base updated where necessary. A copy of the SA Scoping Report is available online at: http://www.petworth-tc.gov.uk.

The 13 Neighbourhood Plan Sustainability Objectives were informed by a review of other plans and policies, notably the emerging South Downs National Park Local Plan's own Sustainability Objectives. Following consultation it was not considered that the Sustainability Objectives required amending further. These Sustainability Objectives therefore now provide the sustainability appraisal framework for this appraisal of the JHHNP. The 13 objective are:

Sust	ainability Objectives
1.	To conserve and enhance landscape character.
2.	To ensure the Petworth community is prepared for the impacts of climate change.
3.	To address the causes of climate change through reducing emissions of greenhouse gases.
4.	To conserve and enhance the biodiversity within Petworth.
5.	Conserve and enhance the historic environment, heritage assets and their settings.
6.	To improve the health and well-being of the population and reduce inequalities in health and well-being.
7.	To improve accessibility to all health, educational, leisure and community services.
8.	To improve the efficiency and safety of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel and increase pedestrian safety on the roads.
9.	To 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.	Enable viability of the local economy with improved diversity of employment opportunities and provision of space for required employment growth.
11.	To reduce levels of deprivation within Petworth.
12.	Minimise flood risk for new and existing development.
13.	To encourage the development of a buoyant, sustainable tourism sector.

Following the Scoping Report consultation, the draft Neighbourhood Plan site options (and alternatives) were appraised against the 13 SA objectives contained within the sustainability appraisal framework, with an assessment made concerning the predicted social, economic and environmental effects of the options. The options were assessed according to the criteria set out in table 1 below.

Table '	1:	Assessment	Criteria

Pos	Positive		Neutral	Nega	tive
++	+	?	0	-	
Significant positive effect on the objective	Positive effect on the objective	Uncertain effect on the objective	No effect on the objective	Negative effect on the objective	Significant effect on the objective

In light of the public and statutory body feedback on the June to July 2016 options consultation and further information and evidence that had come to light, the Pre-Submission Draft Neighbourhood Plan was prepared. Alongside the Pre-Submission Draft Neighbourhood Plan a draft Sustainability Appraisal was published for public and statutory body feedback between March and May 2017. A copy of the draft Sustainability Appraisal is available online at: <u>http://www.petworth-tc.gov.uk</u>.

In light of the public and statutory body feedback on the Pre Submission Draft Neighbourhood Plan and draft Sustainability Appraisal report; and further information and evidence that has come to light, a number of Neighbourhood Plan policy and objective changes have been made. The majority of policy

and objective changes are considered minor. However, where appropriate, refined policies and objectives contained within the July 2017 Submission Petworth Neighbourhood Plan have been reappraised against the SA objectives. The results are presented in the tables in Section 6 of the July 2017 Submission Petworth Neighbourhood Plan SA report. Additional commentary text has also been provided in response to feedback on the draft Pre-Submission draft Sustainability Appraisal.

Throughout the preparation of the Petworth Neighbourhood Plan, having identified and described the likely effects of each option, we have evaluated their significance. When forming a judgement on whether a predicted effect will be significant, we gave consideration where appropriate and possible to the magnitude and duration over time. This process included consideration of mitigation to prevent, reduce or offset the adverse effects of the options.

The conclusion of the assessment of the Petworth Neighbourhood Plan objectives and policies is that, they will have no significant negative environmental effects and will promote sustainable development. In meeting the level growth prescribed by the emerging South Downs National Park Local Plan, a number of site allocations were necessary on greenfield land due to the limited availability of deliverable and developable previously developed land within Petworth. The policies have been clearly selected and drafted to ensure that any potential for negative impacts is avoided though site selection and effective policy wording.

Preparing the Petworth Neighbourhood Plan has required the use of planning judgement to strike the right balance between the technical suitability and community acceptability of the Neighbourhood Plan. In some cases, this can lead to policies that may not be the most sustainable of all the potential choices made, but they are nonetheless sufficiently sustainable so that they will lead to no significant environmental effects.

However, the conclusion remains that in a number of cases, the Petworth Neighbourhood Plan should deliver positive effects for local residents and businesses as Petworth meets its development needs in the period up to 2033. Reasonable alternative policy options have been assessed within the Sustainably Appraisal report to compare and contrast the options chosen, but in no case does the alternative perform better, against the chosen policy and there is therefore no case for policy changes as a result.

SEA guidance requires measures to prevent, reduce or offset significant adverse effects of implementing the plan. Where practical the SA report identifies the likely negative and positive impacts each policy has on achieving sustainability objectives based on the SA framework set out. It demonstrates that the policies of the Petworth Neighbourhood Plan will positively contribute towards delivering the social, economic and environmental objectives set out in the SA framework. Where any potential negative effects were identified, it was concluded that the policies in the Petworth Neighbourhood Plan, the Saved policies of the Chichester District Further Alterations 1999, the emerging South Downs National Park Local Plan, or the NPPF, and guidance within the PPG adequately alleviated or mitigated the impacts, particularly over the medium to longer term. The loss of some greenfield land to meet Petworth's development needs is unavoidable.

Petworth Town Council and the South Downs National Park Authority will jointly monitor the effectiveness of the implementation of the Petworth Neighbourhood Plan using available data. The purpose of monitoring is to provide information on the social, environmental and economic effects of planning policy documents help determine the extent to which objectives, targets and programmes are being met. Monitoring will also allow the Councils' to know if it is necessary to trigger contingency plans should performance fall below expectations, or circumstances significantly change.

### 1.0 Introduction

- 1.1 This is a Sustainability Appraisal (SA) of the Petworth Neighbourhood Plan. A plan showing the extent of the designated Petworth Neighbourhood Plan area is included at Appendix 1. The Petworth Neighbourhood Plan will set out a vision for the future of the area to 2033, providing a strategy to manage improvements and a land use framework for development. If supported at referendum, the Petworth Neighbourhood Plan will gain statutory status and form part of the Development Plan, against which development proposals will be considered.
- 1.2 A Neighbourhood Plan must meet a number of basic conditions, as set out in paragraph 8 (2) of Schedule 4B of the Town and County Planning Act 1990 and applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004. These basic conditions include the requirement that the making of the Neighbourhood Plan does not breach, and is otherwise compatible with EU obligations. Where a Neighbourhood Plan could have significant environmental effects, it may fall within the scope of the Environmental Assessment Regulations 2004 (which seeks to implement European Union Directive 2001/42/EC) and therefore require a Strategic Environmental Assessment ("SEA").
- 1.3 A Habitats Regulation Assessment (HRA) for the emerging South Downs National Park Local Plan has been undertaken by the South Downs National Park Authority. Through the HRA, consideration of the potential impacts of the level of development at Petworth over the period up to 2033 has been undertaken. The emerging South Downs National Park Local Plan requires the delivery of approximately 150 additional new homes and 1.4 hectares of new employment land at Petworth. For the purpose of the HRA, the only sites considered relevant are Special Areas of Conservation ("SACs"). The SACs in relatively close proximity to Petworth being: The Mens SAC, Ebernoe Common SAC and Ducton to Bignor Escarpment SAC. The HRA concludes that there would be no likely significant effects on sites of European habitats or species as defined under the European Union's Habitats Directive 92/43/EED as a result of the level of development proposed at Petworth over the period up to 2033.
- 1.4 A SA extends the concept of SEA as a process through which to assess the environmental as well as social and economic impacts of a policy, plan or programme and its likely contribution to the delivery of sustainable development overall. The SA fully incorporates the requirements of the SEA Directive.
- 1.5 Consultation on the SA Scoping Report was undertaken between January and May 2016, parallel to consultation on the options stage of the Petworth Neighbourhood Plan. The SA Scoping Report set out the intended scope of, and methodology for, appraising the Petworth Neighbourhood Plan. The Petworth Neighbourhood Plan Sustainability Objectives set out in the Scoping Report were informed by a review of other plans and policies, notably the emerging South Downs National Park Local Plan's own Sustainability Objectives, and an appraisal of the

key characteristics specific to Petworth as identified in the Baseline Report. A summary of the key statutory consultee responses and how they have been taken into account are provided below:

Statutory Consultee	Summary of consultee response	Response to consultee feedback
Historic England	Need to clarify; challenges' and 'issues' and not interchange their use.	Clarity included and reference made to Springfield House
	Springfield House, North Street is a Grade II building that is considered to be 'at risk' building. This should be referenced.	Springheid House
	Useful to incorporate assessment indicators	
South Downs National Park Authority	Clarity need over perceived shortfall within the Residents Survey and actual shortfall evidence within the SDNPA evidence base of provision of facilities	Clarity provided.
	for children and young people and sports and leisure facilities within Petworth	Due to the availability of data, it has not been possible to include public rights usage data.
	Walking / cycling data: Mapping usage of public rights of way could be useful	

1.6 Following consultation on the SA Scoping Report, it was not considered that the Sustainability Objectives required amending further. These Sustainability Objectives therefore provide the SA framework for appraisal of the Petworth Neighbourhood Plan objectives and policies. In light of the consultation response the Baseline Report was been subsequently updated. Both the Scoping Report (February 2016) and updated Baseline Report are available online at http://www.petworth-tc.org.uk.

#### Key Plans, Policies and Programmes

- a) National Planning Policy Framework 2012
- b) National Planning Practice Guidance
- c) Saved policies of the Chichester Local Plan 1999,
- d) West Sussex Sustainability Strategy 2015-2019
- e) West Sussex County Council Transport Plan 2011-2026
- f) West Sussex Sustainable Energy Study 2009
- g) West Sussex Cultural Strategy 2009-2014
- h) West Sussex Sustainable Community Strategy 2008-2020
- i) WSCC A Strategy for the West Sussex Landscape 2005
- j) West Sussex Strategic Flood Risk Assessment 2010

- k) Sussex Historic Landscape Characterisation- WSCC and others, 2010
- Using Less, Living Better Action Plan- West Sussex Environment and Climate Change Board, 2012
- m) Sussex Biodiversity Action Plan
- n) South Downs National Park Partnership Management Plan, 2014-2019
- o) SDNPA Access Network and Accessible Natural Greenspace Study Part 1, January 2014
- p) SDNP Renewable and Low Carbon Energy Study, May 2013
- q) South Downs Integrated Landscape Character Assessment, 2011
- r) SDNP Transport Study Phase 1 Report, March 2013
- s) SDNPA Water Cycle Study and Strategic Flood Risk Assessment, Level 1 Scoping and Outline Report, April 2015
- View Characterisation and Analysis, Viewshed Study Report of the SDNP, November 2015

	ainability Problem	SEA Topic Included in Directive 2001/42/EC	Evidence of the problem
Envir	onmental		
1.	Design Quality	Material assets/cultural heritage and archaeology	Parts of Petworth Parish are covered by conservation areas, highlighting the historical quality of the local built environment, and the town contains a great number of listed buildings, including the Grade I listed Petworth House. Springfield House, North Street is a Grade II building that is considered an 'at risk' building by Historic England. An updated Character Appraisal and Management Plan for Petworth Conservation Area has been adopted by SDNPA in October 2013.
2.	Location in National Park	Nature conservation	A key issue for the National Park are the threatened habitats and heritage (SDNP Management Plan 2013). Over the last 150 years, nationally and internationally important species and habitats still exist in the National Park and have suffered extensive damage through the loss of habitats, their fragmentation and degradation. Additional factors such as climate change, new diseases and invasive species add to this pressure.
3.	Visitor pressure	Climatic factors/air quality	Visitor pressure is a key issue in the National Park (SDNP Management Plan 2013). The tourism sector is fragmented and transport options for those who want

#### Key Sustainability Issues

			to leave their cars at home are often limited.
4.	Biodiversity	Nature conservation	There are no Sites of Special Scientific Interest (SSSI) in the PNDP area however, there are six in close proximity to Petworth town and adjacent to the Plan area. Ebernoe Common, The Mens and Duncton to Bignor Escarpment are designated as Local Nature Reserves and Special Areas of Conservation along with Burton and Chingford Ponds to the south of the Plan border. The effects upon bat populations of the Ebernoe and Mens SACs including their commuting/ foraging routes will be taken into consideration when determining locations of new development in the PNDP area.
5.	Landscape Quality	Landscape and townscape	Petworth NP area falls within the Greensand Hills, Low Weald and Sandy Arable Farmland areas (South Downs Integrated Landscape Assessment).
			The Greensand Hills forms prominent hills formed from sandstones, significant woodland, ecologically rich habitats, extensive panoramic views and dispersed medieval settlement form.
			The Low Weald character area comprises a lowland vale landscape with deciduous woodland including ancient and ecologically important woodlands. It is described as a rural, tranquil and enclosed landscape with a medieval pattern of development.
			The Sandy Arable Farmland character area forms lowland sandstone landscape which is easily eroded. The character of the area is described as a simple, open arable landscape. Mature standard oaks and ancient woodland are key ecological features in this predominantly arable landscape.
6.	Geology	Soils and geology	Petworth lies predominantly within Lower Greensand Deposits and partially within Wealden Series (South Downs Integrated Landscape Character Assessment 2011).
			Generally the area has low quality grade 3 and 4 agricultural land classification or non-agricultural land. However, there are some areas within the NP area towards the south that have high quality grade 1-2

			agricultural land classification and are currently used for farming.
7.	Climate Change	Climatic factors	Climate change has fundamental impacts upon the National Park, which is already experiencing more unpredictable and more extreme weather events. This leads to changes in landscape features, habitats and crops, as well as contributing to soil erosion and flooding (SDNP Management Plan 2013).
8.	Air Quality	Air quality/climatic factors	Air quality is an area of concern to the residents in Petworth as identified through the Petworth Vision Residents and Traders survey consultation 2013. This is likely to be a result of through traffic and congestion however; surveys have not been produced to quantify the air pollution and noise levels generated. Furthermore, residents speculate that there has been some damage to the fabric of historic buildings and monuments as a result of the vibration of through traffic.
9.	Water Resources	Water/climatic factors	A key issue for the National Park is the pressure on water resources as they are exacerbated by the vulnerability of the water environment to climate change, pollution pressures from wastewater treatment works and run off from urban and agricultural land (SDNP Management Plan 2013).
10.	Changing Values, Behaviors and Lifestyles	Human population/climatic factors	Individual lifestyle choices have had a strong impact on the future of the National Park, both positive and negative. These have included the level of car use, the amount of local produce consumed, overall carbon footprint, water consumption, and choices about leisure time (SDNP Management Plan 2013).
11.	Flood Risk	Water/climatic factors	The majority of the area is not at flood risk with the exception of small areas to the south of the NP area (Environment Agency flood risk map).
Socia		1.1	
12.	Demographic/Ageing population	Human population	In terms of age profile in Petworth, the 2011 Census shows that the largest proportion of residents are aged 45-64 (27.2%) followed by 26.8% aged 65+.
13.	Deprivation	Human population/human health	The Parish of Petworth contains the 5th most deprived Lower Super Output Area in the district (The Index of Multiple Deprivation 2010).

14.	Skills	Human population	Residents of Petworth have lower skill levels compared to district and national levels. Only 23.9% of residents have level 4 qualifications and above compared to 32.4% in Chichester District and 27.4% in England. Petworth has a higher proportion of residents with no qualifications (26.5%) compared to 19.5% in Chichester District and 22.5% in England.
15.	Health problems	Human health	There are 18.9% of residents that suffer from long term health problems in Petworth. This is higher than the South East (15.7%) and District level (17.5%) as noted in the Census 2011.
16.	Affordable housing need	Human population	In June 2014, the Petworth Affordable Housing Provisions document noted that 73 households with a local connection to the parish of Petworth were on the housing register, of which 23 (32%) are in bands A- C and considered to have a priority need for housing. The SDNP Housing Requirements Study (2011) indicates there is a need for approximately 640 additional affordable homes annually in the National Park. The PNP Issues Consultation Report (July 2015) identified that approximately half of the respondents 'strongly agreed' or 'agreed' that new housing should be provided for social rented housing (49%).
17.	Leisure	Human health/human population	The Petworth Vision Residents Survey 2013 indicated that there is a perceived under provision of facilities for children and young people and sports/leisure facilities. The PNP Issues Consultation Report highlighted the need for additional leisure facilities for Petworth. For instance, a large proportion of respondents 'strongly agreed' or 'agreed' (65%) that Petworth needs more indoor sports facilities.
18.	Traffic, Parking and Road Safety	Human population	The Petworth Residents Vision Survey (2013) noted that 400 comments were made relating to traffic or car parking in Petworth. Key themes for consideration were the speed of traffic, HGVs and large vehicles, volume and obstructions to traffic flow such as parked cars, and easier/free parking. Key issues relating to traffic, parking and road safety from the PNP Issues Consultation Report include the following: lorry access to the town centre should be

			restricted to defined times; measures should be introduced to slow traffic and prioritise pedestrian safety; and town centre parking.
19.	Accessibility	Human population	The Petworth Residents Survey 2013 highlighted issues relating to accessibility. Almost half of the respondents (44.4%) found Petworth's pavements and walkways only 'adequate'.
			There is virtually no existing data on walking and cycling in the SDNP. Mapping needs to be developed further for walking and cycling to gain better insight into the use of cycleways (South Downs National Park Transport Study 2013).
			There are reasonably good bus services operating in Petworth but they have high costs and the low frequency of some services means that travelling by car is often an easier alternative.
			Key issues relating to accessibility from the PNP Issues Consultation Report include the following: A better bus service with real time information should be provided; safe walking routes to school are needed; and cycle routes should be improved.
Econ	omic		
20.	Tourism	Cultural Heritage/ Material Assets	Tourism is an important part of the Petworth economy. Petworth House attracts thousands of tourists a year and the wealth of antique shops attracts visitors nationally and internationally, as well as those visiting the National Park. Petworth is also well known for accommodating an array of festivals including: The Petworth Festival, Goodward Festival of Speed and Petworth Food Festival.
20.	Employment land		There is a demand for business space in the north sub-area of Chichester where Petworth is located due to the amount of converted farm buildings and the relatively few vacant units on the estates. (Employment Land Review 2012)
21.	Variety of shops		Petworth has a specialised retail role as a centre for antiques. However, the town only has one small supermarket, which reduces the potential for the town centre to retain more expenditure locally (Chichester Retail Study 2010).

The South Downs Retail Evidence Study, 2015 outlines that overall Petworth is a well-maintained and attractive town, which is functioning particularly well for such a small centre. This study reconfirms the supermarket conclusions of the 2010 study.
The Petworth Residents Vision Survey 2013 highlighted that there is not a good variety of shops in the town centre. The Petworth Traders Survey 2013 also highlighted this issue stating that a wider variety of shops would help attract more shoppers to the town.
The PNP Issues Consultation Report identified that a large proportion of respondents 'strongly agreed' or 'agreed' (63%) that a greater range of shops should be available in Petworth. The report also highlighted that the vast majority of respondents 'strongly agreed' or 'agreed' (88%) that existing shopping areas should be protected and supported.

- 1.7 On 4 April 2017 the Pre-Submission Draft Petworth Neighbourhood Plan was formally published for the statutory 6-week Regulation 14 consultation. As part of the accompanying evidence base, a Draft Sustainability Appraisal was published for consultation. The Regulation 14 Draft Petworth Neighbourhood Plan: Draft Sustainability Appraisal, March 2017 is available online at http://www.petworth-tc.org.uk.
- 1.8 A summary of the key statutory consultee responses to the Pre Submission Draft Petworth Neighbourhood Plan Sustainability Appraisal and how they have been taken into account are provided below:

Statutory Consultee	Summary of consultee response	Response to consultee feedback
Historic England	Clarity welcomed over the decision making criteria used within the assessment	Decision making criteria has been included as Appendix 4 to this SA.
South Downs National Park authority	Numerous fact and typographic suggestions	Fact and typographic suggestions have been incorporated into this SA.
National England	No comment	N/A

1.9 In addition to the above statutory consultee responses a single additional public submission was made by Vail Williams on behalf of the landowners of Site PW19. A summary of the key Sustainability Appraisal concerns and how they have been taken into account are provided below:

Summary of consultee feedback	Response to consultee feedback
Reasons have not been given for selecting the	Within the Pre-Submission Draft
preferred housing site option over the other	Sustainability Appraisal details were set
reasonable alternatives	out within Section 3: Developing and
	refining options including reasonable
	alternatives. However, in light of the
	feedback additional detail has been
	provided within Section 3 and 5 of this
	iteration of the Sustainability Appraisal.
Reasons have not been given as to why the	The reason why alternative options were
reasonable housing site alternative options	not taken forward was set out within
have not been taken forward	Section 6 or the Pre-Submission Draft
	Sustainability Appraisal. However, in light
	of the feedback additional detail has been
	provided within Section 6 of this iteration
Dessens have not been siven why sites where	of this Sustainability Appraisal.
Reasons have not been given why sites where	In response to the feedback additional
placed within differing housing options	detail has been provided within Section 5 of this Sustainability Appraisal.
Consideration has not been given to an option	In response to the feedback the
of simply ranking the suitable sites and	suggestion option has been considered
selecting the most sustainable sites from that	within Section 5 of this iteration of the
ranking process.	Sustainability Appraisal
It is unclear when the site selection process	In response to the feedback the
based on a series of criteria took place.	suggestion option has been considered
	within Section 5 of this iteration of the
	Sustainability Appraisal
The proposed primary school access road has	In response to the feedback further
been given significantly greater weight than is	consideration have been given within
justified.	Section 6 and the assessment outcomes
	have been moderated accordingly
Site PW19 must be included within option 1	In response to the feedback the
together possibly with PW18 as a reasonable	suggestion option has been considered
alternative.	within Section 5 of this iteration of the
	Sustainability Appraisal

- 1.10 Copies of the statutory consultee and other submissions are appended to the Consultation Statement.
- 1.11 In light of the public and statutory consultee feedback, a number of changes have been made to strengthen and / or improve the clarity of the Petworth Neighbourhood Plan policies and objectives. Throughout this SA the policy and objective refinements, where necessary, have been subjected to Sustainability Appraisal. A number of explanatory and background sections within the SA have also been updated, in response to consultation feedback, to provide greater clarity and explanation of the Neighbourhood Plan plan-making and decision-making process. Similarly, in a number of instances Sustainability Assessment objective outcomes have been updated to reflect on more up-to-date information and in response to consultation feedback.

#### Structure of the Report

- 1.12 The remainder of this report is structured as follows:
  - **Section 2** sets out the Sustainability Objectives which form the framework for appraising the Petworth Neighbourhood Plan;
  - Section 3 describes the methodological approach taken to this SA;
  - Section 4 provides an appraisal of the Petworth Neighbourhood Plan objectives;
  - Section 5 provides a background on the Site Alternatives;
  - Section 6 provides an appraisal of the Petworth Neighbourhood Plan policies;
  - Section 7 provides conclusions on the overall assessment;
  - Section 8 outlines the mitigation required to address possible identified adverse effects; and
  - Section 9 identifies means through which to monitor the environmental effects of the Petworth Neighbourhood Plan.

## 2.0 The Sustainability Framework

2.1 The Petworth Neighbourhood Plan Sustainability Objectives that form the SA framework against which the Neighbourhood Plan Key Principles and policies are assessed are set out within Table 2.1 below.

#### Table 2.1: Sustainability Appraisal Objectives

Sust	ainability Objectives
1.	To conserve and enhance landscape character.
2.	To ensure the Petworth community is prepared for the impacts of climate change.
3.	To address the causes of climate change through reducing emissions of greenhouse gases.
4.	To conserve and enhance the biodiversity within Petworth.
5.	Conserve and enhance the historic environment, heritage assets and their settings.
6.	To improve the health and well-being of the population and reduce inequalities in health and well-being.
7.	To improve accessibility to all health, educational, leisure and community services.
8.	To improve the efficiency and safety of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel and increase pedestrian safety on the roads.
9.	To 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.	Enable viability of the local economy with improved diversity of employment opportunities and provision of space for required employment growth.
11.	To reduce levels of deprivation within Petworth.
12.	Minimise flood risk for new and existing development.
13.	To encourage the development of a buoyant, sustainable tourism sector.

2.2 For clarity, the reference to Petworth with the Sustainability Objectives relates to the Neighbourhood Plan area.

## 3.0 Methodology

- 3.1 This methodology follows the broad stages set out in the guidance document 'A Practical Guide to the Strategic Environmental Assessment Directive' (September 2005) and the Planning Practice Guidance. This SA Report reflects Stage B: Developing and refining options and assessing effects; Stage C: Preparing the SA report; and Stage D: Consulting on the draft Plan and SA report.
- 3.2 Although the PPG was updated in 2015 to include a new Stage A, the methodology stages used with this SA still applies the stages set out within the SA Scoping Report. Stage B within this SA is Stage C within the updated PPG methodology and Stage C within this SA is Stage D within the updated methodology; and Stage D within this SA is Stage E within the updated methodology. As the Petworth Neighbourhood Plan and SA process had already commenced prior to the PPG changes the existing methodology structure has been retained to avoid any confusion between reports.

## B1: Testing the Neighbourhood Plan objectives against the Sustainability Objectives of this framework

3.3 The draft Petworth Neighbourhood Plan objectives are assessed against the Sustainability Objectives of the framework and classified in terms of compatibility, as set out in Table 3.1 below.

✓	Positively compatible
0	Neutral / no effect
Х	Negatively compatible

#### B2: Developing and refining options including reasonable alternatives

- 3.4 The policies of the Petworth Neighbourhood Plan must be in line with existing higher-tier policies and guidance contained in the Saved policies of the Chichester District Local Plan 1999; the emerging policies of the South Downs National Park Local Plan; the National Planning Policy Framework and the Planning Practice Guidance.
- 3.5 The emerging South Downs National Park Local Plan requires the delivery of approximately 150 new homes at Petworth over the period up to 2033. Should the Neighbourhood Plan not seek to allocate land to deliver these new homes then the South Downs National Park Authority would be obliged to do so.
- 3.6 The preparation of the Petworth Neighbourhood Plan has been an iterative process, led by a clear vision for the future of Petworth. A key part of the SA is evaluating any reasonable

alternative policy options.

3.7 As set out within Section 5 of this SA and the Site Assessment document, 31 sites were promoted by landowners as having the potential to accommodate new residential development and a single site promoted for employment development. To help develop and refine the potential housing site options to meet the emerging housing figure for Petworth (approximately 150 dwellings) the Neighbourhood Steering Group developed a set of site assessment criterion (the RAG assessment criteria). These assessment criterion were subjected to public consultation as part of the Options consultation in 2016 and used as one of the tools in the decision-making process. The assessment criterions and the complementary Sustainability Objectives are set out below at Table 3.2.

## Table 3.2: Petworth Neighbourhood Plan Site Assessment Criterion and complementarySustainability Objectives

NP	Site Assessment Criterion	Sustainability Objectives of the SA framework
1	Walkability: Distance to the town centre, schools and health	3, 6, 7, 8, 9
1	centres	
2	Access: Existing vehicular and pedestrian access	8
2	arrangements to the site	
3	Impact on highway network and resident safety	3, 7, 8
4	Loss of car parking: Would development of the site result in	8
4	the loss of existing car parking facilities	
	Biodiversity / Ecology: Impact on any biodiversity	4
5	designations including the SAC's outside the	
	Neighbourhood Plan area	
6	Landscape: Impact on any landscape designations,	1
0	topography and landscape characteristics	
7	Flood Risk	12

- 3.8 As set out within the Site Assessment document, alongside the RAG assessment, land availability assessments were also undertaken for the 32 identified sites. Collectively the RAG assessment and the land assessment comprise the site assessment process.
- 3.9 As set out in detail within Section 5 and the Site Assessment document, after being subjected to the site assessment criterion and the land availability assessment, 12 of the 21 potential sites were considered by the Housing Working Group to be suitable potential housing sites.
- 3.10 These 12 sites were therefore considered to be reasonable alternative housing site options. As set out within Section 6, this SA presents the appraisal of the 12 individual site options using the framework's Sustainability Objectives.

3.11 Collectively these 12 potential sites have the potential capacity (notwithstanding any landscaping buffers etc) to accommodate approximately between 756 and 1,057dwellings – a level of housing growth significantly greater than that proposed within the emerging South Downs National Park Local Plan. As set out within Section 5, in light of this the Housing Working Group and the Neighbourhood Plan Steering Group developed three housing sites options, each option comprising sufficient potential housing sites to deliver approximately 150 dwellings. The three options were subjected to public consultation as part of the Options consultation in 2016 The options comprised:

**Option 1:** Allocation of two sites near the centre of the town and a further area of housing to the south of Petworth, creating a new southern access to the school.

**Option 2**: Allocates the majority of development to the west of the town, with smaller sites around Rothermede, Rotherbridge Lane and an extension to Sheepdown Close.

**Option 3**: Allocates the development to the norther of the town around Hampers Green. The option includes a large site opposite Hampers Green and smaller sites accessed from Northend Close.

- 3.12 Plans showing the three site options are included at Appendix 3.
- 3.13 In some instances, a 'No Policy' option to 'do nothing' has been considered against the proposed Neighbourhood Plan policy. This option broadly relies upon existing local and national policy guidance including the Saved policies of the Chichester Local Plan 1999; the emerging policies of the South Downs National Park Local Plan, the National Planning Policy Framework and the Planning Practice Guidance.

#### Stage B3 & B4: Predicting and evaluating the effects of the plan

3.14 Where the implementation of the Petworth Neighbourhood Plan objectives or policies is likely to change the existing *situation*, the effects are assessed in terms of the nature of the effect (positive, negative, neutral, or uncertain) and where possible and appropriate its magnitude and duration over time. Table 3.3 sets out the terminology used within the appraisal matrices within Section 6 of the Report.

Pos	sitive	Uncertain	Neutral	Neg	gative
++	+	?	0	-	
Significant positive effect on the objective	Positive effect on the objective	Uncertain effect on the objective	No effect on the objective	Negative effect on the objective	Significant effect on the objective

Table 3.3: Key fo	r assessment of effects
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- 3.15 Predictions are supported by evidence, such as references to research, baseline information, discussions or consultation, which helped those carrying out the SA to reach their conclusions. The key evidence base sources available on line at: http://www.petworth-tc.org.uk. A schedule setting out the assessment protocols applied for each SA Objective is included in Appendix 4.
- 3.16 As an iterative process Sustainability Appraisal, outcomes have been periodically reviewed in light of new information and consultation feedback. This has ensured decision-making is based on the most up-to-date information as possible.

#### B5: Considering ways of mitigating adverse effects

3.17 Throughout the assessment process, where impacts have been identified appropriate mitigation and / or avoidance measures have been identified where possible. Further consideration of mitigating adverse effects is provided within Section 8.

#### B6: Proposing measures to monitor the environmental effects of the plan

3.18 The significant adverse environmental effects of the implementation of plans must be monitored to identify any unforeseen adverse effects and to enable appropriate remedial action to be taken. Consideration of monitoring the Petworth Neighbourhood Plan is provided within Section 9.

## 4.0 The Sustainability Framework and The Neighbourhood Plan Objectives

- 4.1 This section appraises the Petworth Neighbourhood Plan theme objectives and predicts the significance of the impact upon the Sustainability Objectives of the SA framework. Table 4.1 demonstrates the key for the comparison between the Neighbourhood Plan theme objectives and the SA Objectives.
- 4.2 Following the Pre Submission Draft Neighbourhood Plan consultation, a number of minor word changes were made to some of the objectives. However, the minor changes made did not fundamentally change the intention of the objectives.

Table 4.1: Comparison Key

Positive compatibility
Uncertain
Neutral/ No Effect
X Negative compatibility

Table 4.2 Neighbourhood Plan Theme Objectives compatibility with Sustainability
Appraisal Framework Objectives

				Sust	ainat	oility	Appr	aisal	Obje	ctives	(Tab	le 2.1)		
		1	2	3	4	5	6	7	8	9	10	11	12	13
	HO1	-	0	0	?	?	?	?	0	++	0	0	0	0
	HO2	+	+	+	+	+	+	+	+	+	0	0	+	0
	HO3	0	0	0	0	0	0	0	0	+	0	+	0	0
Ne	HO4	0	0	0	0	0	0	0	0	+	0	+	0	0
Neighborhood Plan Theme	HO5	0	0	0	0	0	0	+	+	+	0	0	0	0
odi	HO6	0	0	0	0	0	0	0	0	0	0	0	0	0
rh	HO7	0	0	0	0	0	0	0	0	+	0	+	0	0
ő	ESDO1	+	0	0	+	0	0	0	0	0	0	0	0	0
P	ESDO2	+	0	0	0	+	0	0	0	+	0	0	0	0
lan	ESDO3	+	0	0	0	0	0	0	0	+	0	0	0	0
1	ESDO4	+	0	0	+	0	+	+	0	0	0	0	0	0
her	ESDO5	0	0	0	+	0	0	0	0	0	0	0	0	0
ne	ESDO6	+	0	0	0	0	0	0	0	0	0	0	0	0
<b>P</b>	ESDO7	0	+	+	0	0	0	0	0	+	0	0	0	0
Objectives	WS1	0	0	0	0	0	0	0	0	0	+	0	0	+
živ	WS2	0	0	0	0	0	0	0	0	0	+	0	0	+
es	WS3	0	0	0	0	0	0	0	0	0	+	0	0	+
	WS4	0	0	0	0	0	0	0	0	0	+	0	0	+
	WS5	0	0	0	0	0	0	0	+	0	+	0	0	+
	WS6	0	0	0	0	0	0	0	0	0	+	0	0	+

		Sustainability Appraisal Objectives (Table 2.1)													
		1	2	3	4	5	6	7	8	9	10	11	12	13	
GO1		0	0	0	0	0	0	0	+	0	0	0	0	0	
GO2		0	0	0	0	0	0	0	+	0	0	0	0	0	
GO3		0	0	0	0	0	0	0	+	0	0	0	0	0	
GO4		0	0	0	0	0	0	0	+	0	0	0	0	0	
GO5		0	0	0	0	0	0	0	+	0	0	0	0	0	
LWO1		0	0	0	0	0	+	+	0	0	0	0	0	0	
LWO2	•	0	0	0	0	0	+	+	0	0	0	0	0	0	
LWO3		0	0	0	0	0	+	+	0	0	0	0	0	0	
LWO4		0	0	0	0	0	+	+	0	0	0	0	0	0	

## Compatibility of the Petworth Neighbourhood Plan Objectives and the SA framework Sustainability Objectives

4.3 It is important that the objectives of the Petworth Neighbourhood Plan are in accordance with the Sustainability Objectives of the SA framework. As set out within Table 4.2, the majority of the theme objectives of the Petworth Neighbourhood Plan are positively compatible with, or have a neutral effect on the SA framework where there is no association between the objectives.

### 5.0 Site Alternatives

- 5.1 As set out within Section 3, the emerging South Downs National Park Local Plan proposes the delivery of approximately 150 new homes and 1.4 hectares of new employment land at Petworth over the period between 2015 and 2033. To meet the emerging Local Plan requirements the Petworth Neighbourhood Plan seeks to allocate land to deliver approximately 150 new homes and 1.4 hectares of new employment land.
- 5.2 The National Planning Policy Framework (paragraph 14, footnote 9) is expressly clear that development within National Park's, such as the South Downs National Park, should be restricted. In light of this, and as confirmed within the emerging Local Plan and the accompanying Local Plan Sustainability Appraisal, the proposed overall level of housing growth within the emerging Local Plan is lower than that concluded as full OAN within the South Downs Strategic Housing Market Assessment (SHMA) (approximately 525 dwellings per annum). The emerging South Downs National Park Local Plan Sustainability Appraisal, 2015 outlines (paragraph 7.7.4) that testing of a housing figure beyond 450 dwellings per annum (across the National Park) was considered to clearly result in unacceptable impacts on the landscape and would constitute unreasonable alternatives.
- 5.3 The apportionment of the South Downs National Park's preferred options housing figure is one based on an approach that:
  - Directs development to the most sustainable locations;
  - Is based on landscape-led assessments;
  - Is based on the services that land and the surrounding area currently provides (ecosystem services)
  - Is based on the need to sustain balanced communities, and
  - Takes into account the function of, and relationship between, settlements.
- 5.4 Based on Petworth's positon within the South Downs National Park settlement hierarchy, it is evident that within the context of the above factors, the proposed housing figure of approximately 150 dwellings over the period 2015 to 2035 meets Petworth's housing needs and contributes to meeting wider needs within the National Park.
- 5.5 In light of the above, testing of an alternative housing figure option above approximately 150 dwellings was therefore not considered to represent a reasonable alternative option. Given national policy is expressly clear (NPPF paragraph 184) that a Neighbourhood Plan must not promote a less development than set out in the Local Plan the testing of a housing figure below 150 dwellings was not considered to represent a reasonable alternative option.

- 5.6 Whilst it is acknowledged that the emerging Local Plan housing figure is still to be independently tested and is therefore subject to a degree of change prior to adoption in 2018, for the reasons set out above it is still not considered appropriate, based on available evidence and consultation feedback to, consider alternative housing figure options.
- 5.7 Should a small degree of housing figure flexibility be ultimately required in response to any revised adopted Local Plan figure, a sequential process has been set out within the Submission Draft Neighbourhood Plan. This process focuses on development opportunities within the defined settlement boundary. Should a material change in the housing figure for Petworth be ultimately required following the adoption of the Local Plan in due course, the sequential process commits the Town Council to a partial review to seek to allocate additional housing land (namely additional greenfield land outside the defined settlement boundary). This partial review, if required, would be informed by a new Sustainability Appraisal.
- 5.8 As part of the Petworth Neighbourhood Plan process, 32 sites were identified for potential housing development, including those identified by the South Downs National Park Authority through their Strategic Housing Land Availability Assessment process. A single site was identified and promoted for employment development. Through the housing Site Assessment process, which included reviewing the benefits and constraints of the sites, 12 sites (38%) were considered potentially suitable for housing development. These 12 sites were considered to represent reasonable alternative options for the purposes of the SA.
- 5.9 The 20 sites that were not considered suitable for residential development following the Site Assessment process were not considered as reasonable alternative options for the purposes of the SA.
- 5.10 A plan showing the 12 sites considered as suitable and the 20 sites considered unsuitable is included at Appendix 5.
- 5.11 The following schedules summarises the sites promoted for development and considered appropriate (reasonable alternatives) through the Site Assessment process:

#### **Residential Development**

- 5.12 The following sites have been promoted and considered potentially suitable for residential development.
  - PW01 PW21
  - PW03 PW23
  - PW04 PW24
  - PW05 PW25
  - PW18 PW26
  - PW19 PW31

#### Employment Development

- 5.13 The following site was promoted / considered for employment use:
  - Land east of Hampers Common Industrial Estate

#### **Housing Site Alternative Options**

3.19 Collectively the 12 sites assessed and considered suitable have the potential capacity to accommodate approximately between 756 and 1,057 dwellings (based on gross site density). This being a level of housing growth significantly greater than that proposed within the emerging South Downs National Park Local Plan over the period up to 2033. In light of this, the Housing Working Group and the Neighbourhood Plan Steering Group developed three housing sites options, each option comprising sufficient housing land potential capacity to deliver approximately 150 dwellings. A plan showing the three sites options is included as Appendix 3. The three options were subjected to public consultation as part of the Options consultation in 2016. The three options are summarised below:

#### Option 1

- 5.14 Allocation of a longstanding previously developed site (the Rotherlea site [PW25]) within the existing defined settlement boundary; and two greenfield sites (the Square Field site [PW24] and Petworth South site [PW23 and PW31]) that are all within approximately a 10-minute walk or less of the town centre.
- 5.15 Bringing forward the Rotherlea site has historically been frustrated, in part, by local highway network capacity concerns (namely the Dawtrey Road / Station Road roundabout that is a key junction for the Primary School). However, the Petworth South site has the potential to deliver a new access road to Petworth Primary School, which would assist in enabling a locally acceptable development to come forward on the longstanding previously developed Rotherlea site. In light of this, the Petworth South site and the Rotherlea site must be included within the same option.
- 5.16 The Square Field site was included within Option 1 as it performed well against the site assessment criteria and has sufficient potential housing land capacity along with the Rotherlea site and Petworth South site to deliver at least approximately 150 dwellings. The site was also considered to 'round-off' the settlement boundary along the town's eastern urban edge.

#### Option 2

5.17 As an alternative spatial option to a southern focus (Option 1) and a northern focus (Option 3 – see below), Option 2 sought to focus development to the western central edge of the town

[PW21]. As a large greenfield site (potential capacity for approximately 111 dwellings) only the smaller potential alternative sites would be required to ensure delivery of 150 dwellings.

- 5.18 The Working Group sought to develop the options seeking to make best use of previously developed land ahead of greenfield land, where possible. As referred above, the previously developed Rotherlea site also required the Petworth South site to help address local highway capacity issues. Collectively these sites (PW21, the Rotherlea site [PW25] and the Petworth South site [PW23 and PW31]) had the potential housing land capacity to deliver a significantly greater number of dwellings (approximately 261 dwellings) than required by the emerging Local Plan (approximately 150 dwellings). An option that would be wholly contrary to the emerging higher level Development Plan and therefore was not considered to be a reasonable alternative option.
- 5.19 However, to seek to make the best use of previously developed land the inclusion of the smaller Grain Dryer site [PW18] to the south of the town around Rotherbridge Lane / Station Road was considered to help towards contributing towards make the best use of previously developed land, albeit the site lies outside of the settlement boundary. The greenfield site [PW19] to the rear of Rothermead, which adjoins the Grain Dryer site was also included as it was considered that these two sites had the potential benefit of being able to share access arrangements via Rothermead and Rotherbridge Lane / Station Road. Both sites performed well with no red outcomes as part of the Working Groups site assessment process.
- 5.20 To help distribute growth around the town a greenfield extension of Sheepdown Close [PW26] was included within Option 2.
- 5.21 Collectively all of the sites included within Option 2 are located within approximately a 10-minute walk or less of the town centre.

Option 3

- 5.22 Option 3 sought to focus new development to the north of the town around Hampers Green. Although through the site assessment, the sites around Hampers Green performed less well against the walkability criteria, these sites were considered to have less of a potential impact on the highway network, particularly within the town centre.
- 5.23 Of the four Hampers Green sites that the site assessment considered were potentially suitable for development (PW01, PW03, PW04 and PW05), three were taken forward to form Option 3. These being: a large greenfield site opposite Hampers Green [PW01] and two smaller greenfield sites accessed from Northend Close [PW03 and PW05]. Site PW04 was not taken forward into Option 3 as this site was consider to less connected to the existing developed area of Hampers Green and the urban edge of Petworth more generally. Furthermore, collectively

Sites PW01, PW03 and PW05 have sufficient land capacity potential to deliver at least approximately 150 new dwellings.

#### Pre-Submission Consultation Feedback Alternative Options

- 5.24 As part of the Pre-Submission Neighbourhood Plan consultation a new alternative option approach was suggested (Vail Williams on behalf of the landowners of Site PW19). The alternative suggestion of sought to develop an option based on '*simply ranking the suitable sites and selecting the most sustainable sites from that ranking process*'. However, such a simplistic approach is considered flawed as it relies either on the assumption that all assessment criteria are equal, or on a potentially arbitrary ranking and weighting of criteria.
- 5.25 As set out within the Petworth Neighbourhood Plan Site Assessment, July 2017 (paragraph 1.3), the site assessment process was only piece of the evidence base which informed the decision-making process when developing site options. An overly simplistic option based solely on the site assessment process for individual sites was therefore not considered a reasonable alternative option. This alternative option was therefore rejected.
- 5.26 During the Pre Submission consultation, it was identified that the land associated with Pre-Submission Option 1 had been slightly refined to that identified as part of the Options Consultation Option 1. The amendment had been made following the illustrative masterplan process to include a small part of Site PW30 (western part) and what is considered to be a de minimis portion of site PW32. The inclusion of the additional land was to help assist to delivery a new access road, area of car parking and drop-off area for the Primary School through a landscape-led design approach. Although the additional land included is considered small, the change has been subjected to Sustainability Appraisal within this SA as 'refined Option 1'.

#### **Employment Land Development Alternatives**

3.20 Given only one site was promoted for new employment land use no alternative site options were identified to deliver 1.4 hectares of new employment land. However, in the absence of any identifiable alternative land allocation options a 'No Policy' option was considered.

# 6.0 The Sustainability Framework and the Neighbourhood Plan Policies

6.1 This section appraises the Petworth Neighbourhood Plan policies and predicts the significance of the impact upon the Sustainability Objectives of the SA framework (Table 2.1). The significance assessment applies the 'significant positive' to significant negative' impact range methodology set out within Table 3.2. The results of this appraisal help to identify and describe the likely sustainability impacts of the Petworth Neighbourhood Plan.

#### Policy PP1: Settlement Boundary

#### Policy Refinement

6.2 As set out within Section 1 and the Consultation Statement, in response to public feedback and advice from statutory bodies, namely the South Downs National Park Authority, as part of the Pre-submission Draft Petworth Neighbourhood Plan consultation the proposed Policy PP1 wording has been simplified. However, the changes made are not considered to have significantly changes the policy approach or policy outcome.

#### Summary of the Options:

6.3 To include a policy that redefines the existing settlement boundary to include sites allocated within the Neighbourhood Plan and sets out that development outside the redefined settlement boundary will be resisted. Alternatively, reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework, and guidance within the Planning Practice Guidance.

Policy Alternatives	Sustainability Appraisal Objectives												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Settlement boundary	+	0	0	?	0	0	0	0	0	0	0	0	0
No policy		0	0	?	0	0	0	0	0	0	0	0	0

#### Preferred Option:

6.4 To include a policy that redefines the settlement boundary and resists development outside the redefined settlement boundary.

#### Assessment Comment:

6.5 The settlement boundary policy option scored more positively against the objectives for landscape and largely neutral across the objectives.

#### Why were the other Option(s) rejected?

6.6 The 'No policy' option was rejected as it provided less policy protection against inappropriate development outside the settlement boundary. This could potentially harm the objective of conserving and enhancing the landscape.

#### **Policy PP2: Core Planning Principles**

#### Policy Refinement

6.7 As set out within Section 1 and the Petworth Neighbourhood Plan Consultation Statement, in response to public feedback and advice from statutory bodies, namely the South Downs National Park Authority, as part of from the Pre-submission Draft Petworth Neighbourhood Plan consultation, the proposed Policy PP2 wording has been revised to remove reference to development proposals outside of the defined settlement boundary. However, the changes made are not considered to have significantly changed the policy approach or policy outcome as the principal objective of the policy is to ensure new development is focused within the defined settlement boundary of Petworth.

#### Summary of the Options:

6.8 To include a policy that sets out the overarching core planning principles for future development at Petworth. Alternatively, reliance on the Neighbourhood Plan vision, supporting key principles and objectives.

Policy Alternatives		Sustainability Appraisal Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12	13
Core planning principles	+	0	0	+	+	+	+	+	0	0	0	0	0
No policy	?	0	0	?	?	?	?	0	0	0	0	0	0

#### Preferred Option:

6.9 The preferred option is to include a core planning principles policy.

#### Assessment Comment:

6.10 The preferred option performed more effectively against the objectives as it provides greater certainty that development proposals will take account of cumulative impact of development within Petworth as well as the overarching policy objective of ensuring all development has appropriate regard to the town's historic character and National Park setting. The policy option also provides greater certainty that greenfield development will be resisted which has a positive outcome in respect of biodiversity. Focusing development within the urban boundary also ensures positive outcomes in respect of accessibility to the town centre and community facilities and services.

Why were the other Option(s) rejected?

6.11 The 'No Policy' option was also rejected as provided less positive and certain outcomes.

#### Policy H1: Allocate land for approximately 150 net additional new homes

#### Policy Refinement

- 6.12 As set out within Section 1 and the Consultation Statement, in response to feedback as part of from the Pre-submission Draft Petworth Neighbourhood Plan consultation, the proposed Policy H1 wording has been refined to include the word 'approximately' before 150 net additional dwellings. The reason for the change is to clarify, for the avoidance of doubt, that the 150 net dwellings is an emerging housing requirement within the emerging South Downs National Park Local Plan and therefore, is potentially subject to a degree of change prior to adoption. However, the change made is a clarity point, and is not considered to have significantly changed the policy approach or policy outcome.
- 6.13 During the Pre Submission consultation, it was identified that the land associated with Pre-Submission Option 1 had been slightly refined to that identified as part of the Options Consultation Option 1. The amendment had been made following the illustrative masterplan process to include a small part of Site PW30 (western part) and what is considered to be a de minimis portion of Site PW32. The inclusion of the additional land was to assist to deliver a new access road, area of car parking and drop-off area for the Primary School. Although the additional land included is considered small, the change has assessed as 'refined Option 1'.

#### Summary of the Options:

- 6.14 A key requirement of the Petworth Neighbourhood Plan is to be in general conformity with the policies contained within the Saved policies of the Chichester District Local Plan First Review and the emerging policies of the South Downs National Park Local Plan. Therefore, in accordance with the emerging Local Plan the policy proposed to allocate land for approximately 150 new homes within the Petworth.
- 6.15 Informed by the Site Assessment process, to ensure delivery of approximately 150 new dwellings, three alternative sites options were developed each of which comprising sufficient housing land potential capacity to deliver 150 new dwellings. These options being:

Option 1: Sites PW23, PW24, PW25 and PW31;

Option 2: Sites PW18, PW19, PW21 and PW26

Option 3: Sites PW01, PW03 and PW05.

6.16 Informed by the illustrative masterplan process the land associated with Option was amended to include a small western portion of Site PW30 and a de minimis portion of Site PW32. This refined land area is assessed as 'refined Option 1'. A plan showing the extent of refined Option 1 is included in Appendix 3.

Site Option Policy	Sustainability Appraisal Objectives												
Alternatives	1	2	3	4	5	6	7	8	9	10	11	12	13
Option 1	-	0	0	?	0	+/0	++/+	++/+	+	0	+	+	0
Option 2	-	0	0	?	0/-	0	+	+	+	0	+	+	0
Option 3	-	0	0	?	0/-	0	-	0	+	0	+	+	0
Refined Option 1	-	0	0	?	0	+/0	++/+	++/+	+	0	+	+	0

6.17 To provide a comprehensive understanding, in addition to assessing the options, the individual sites that were identified as potentially suitable (as a whole) through the site assessment process and taken forward into the site options have also been individually assessed.

Individual Site Alternatives	Sustainability Appraisal Objectives												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Site PW01	-	0	0	?	0	0	-	0	+	0	+	+	0
Site PW03	-	0	0	?	-	0	-	0	+	0	+	+	0
Site PW04	-	0	0	?	-	0	-	0	+	0	+	+	0
Site PW05	-	0	0	?	-	0	-	0	+	0	+	+	0
Site PW18	+	0	0	?	0	0	+	+	+	0	+	+	0
Site PW19	-	0	0	?	0	0	+	+	+	0	+	+	0
Site PW21	-	0	0	?	-	0	+	+	+	0	+	+	0
Site PW23	-	0	0	?	0	+	+	+	+	0	+	+	0
Site PW24	-	0	0	?	-	0	+	+	+	0	+	+	0
Site PW25	++	0	0	?	0	0	+	+	+	0	+	+	0
Site PW26	-	0	0	?	-	0	+	+	+	0	+	+	0
Site PW31	-	0	0	?	0	+	+	+	+	0	+	+	0

#### Preferred Option:

6.18 The preferred option is refined Option 1, which principally comprises Sites PW23, PW24, PW25 and PW31, but also include a small western portion of Site PW30 and what is considered to be a de minimis portion of Site PW32

#### Assessment Comment:

#### Options

6.19 The four-policy options and the individual whole sites within the options performed relatively positively with no significant negative impacts identified.

- 6.20 All options result in a negative outcome associated with having an impact on landscape character (Objective 1), principally due to the unavoidable requirement to deliver housing on greenfield sites. Option 1 and refined Option 1 are considered the more preferable options against this objective as delivery of a new access road to the Primary School via the southern sites would enable development on a longstanding previously developed land site within the existing settlement boundary (PW25).
- 6.21 Although the refined Option 1 incudes a small element of additional greenfield land to Option 1 and therefore has a greater potential landscape impact the overall assessment of these two options is the same the overall outcome against Objective 1. The reason being that drawing on the principles set out in the design and landscape led illustrative masterplan will help ensure that landscape impacts associated with development will be mitigated or reduced, particularly over the medium to long term.
- 6.22 Similarly, as confirmed within the Petworth landscape assessment, the potential negative landscape impacts associated within Option 2 and 3, could be appropriately mitigated by measures put in place at the planning application stage. These measures would reduce and / or mitigate negative impacts, particularly over the medium to longer term.
- 6.23 All options were considered to have a neutral outcome against Objectives 2 and 3, which seek to prepare Petworth for the effects of climate change and seek to address climate change. Whilst residential development could result in increased emissions of greenhouse gases, policies are proposed within the Neighbourhood Plan, which seek to deliver sustainable design measures (Policy ESD8). The measures proposed include the construction of low carbon developments.
- 6.24 Similarly, all options were considered to have uncertain outcomes against the extent to which development would conserve and enhance biodiversity (Objective 4). No site within any of the options have any international, national or local biodiversity designations. Although greenfield land will be developed, the majority of the greenfield land is actively manage agricultural land and is therefore likely to have limited existing biodiversity potential. Furthermore, the three large sites within each option would deliver large areas of landscaping, informal open space and new green corridors all of which have the potential to provide positive biodiversity benefits. Residential gardens also have the potential to create greater biodiversity opportunities in comparison to actively managed agricultural land.
- 6.25 Option 3 was considered to have potentially greater potential negative outcomes associated with impact on the character and setting of the Petworth Conservation Area (Objective 5). Under Option 3, all sites abutted the Conservation Area boundary, whereas only one site within Option 1, refined Option 1 and 2 abut the Conservation Area.

- 6.26 All options were considered to have a neutral outcome against Objective 6, which seeks to improve the health and well-being of the population and reduce inequality in health and well-being as no site would increase or decrease health, well-being or community facilities within Petworth.
- 6.27 Against improving accessibility to educational services (Objective 7) and improving the efficiency and safety of the transport network (Objective 8), it was considered that Option 1 and refined Option 1 scored positive to significant positive outcomes. The principal reason being that under these options a new access road the Primary School can be delivered (via a comprehensive development on Sites PW23 and PW31 (Option 1) or via Sites PW23, PW31 and a small portion of PW30 and PW32 (refined Option 1)). This new access road will help address local highway capacity issues associated with the schools existing access arrangement (namely capacity of the Dawtrey Road / Station Road roundabout during school drop-off and pick-up periods). A new car park and drop-off area would also be provided that would potentially having the benefit of helping to improve pedestrian and cycle safety.
- 6.28 Option 2 was considered to achieve a positive outcome against Objective 7 and 8 as all of the sites are within an acceptable and easy walking and cycling distance to key community facilities and services.
- 6.29 Option 3 was considered to achieve a negative outcome against Objective 7 and 8 as although the sites are within an acceptable walking distance to key community facilities and services the route involves in places, very narrow footpaths. As a result it was considered that this might encourage the use of private vehicle trips to and from the town centre.
- 6.30 All options were considered to have a positive outcome against Objective 9, as all options would contribute to the delivery of good quality, affordable homes which are suitable to current and future Petworth resident needs. Likewise, as all options would potentially provide the same level of new affordable homes (approximately 60 affordable homes (40% of approximately 150 dwellings)) and will therefore broadly achieve the same positive outcomes against Objective 11 which seeks to reduce levels of deprivation within Petworth.
- 6.31 All options were considered to have neutral outcome against Objective 10 and 13 as none of the housing site options would provide new employment land or tourist sector related development.
- 6.32 All options comprise land that is wholly Flood Risk Zone 1 so therefore were considered to achieve the same positive outcome against Objective 12, which seeks to minimise flood risk for new and existing development. All greenfield sites within the Options would achieve greenfield run off rates through the delivery of sustainable urban drainage systems.

Individual Sites

- 6.33 Site PW25 was considered to achieve a significant positive against Objective 1 as this was the only previously developed site within the existing urban area of Petworth. Site PW18 was considered to achieve a positive outcome as it is a previously developed site outside of the settlement boundary, but on the edge of the existing urban area. Removal of the Old Grain Store on PW18 through the sites redevelopment could have a positive landscape impact outcome. All other sites PW23, PW24, PW31, PW19, PW21, PW26, PW01, PW03, PW04 and PW05 were all considered to have a negative outcome against Objective 1 as they are all wholly greenfield sites or are predominantly greenfield sites. However, although these sites have the potential to have a negative landscape outcomes, it was a considered that all sites could incorporate design, layout and landscape measures to either reduce and / or mitigate negative impacts, particularly over the medium to long term.
- 6.34 All site were considered to achieve neutral outcomes against Objective 2, 3, 6, 10 and 13. Whilst residential development could result in increased emissions of greenhouse gases, policies are proposed within the Neighbourhood Plan, which seek to deliver sustainable design measures (Policy ESD8). The measures proposed include the construction of low carbon developments. No site was considered to increase or decrease health, well-being or community facilities within Petworth. Similarly, no site would include new employment land or tourist sector related development.
- 6.35 All sites were considered to have an uncertain outcome against Objective 4, which seeks to conserve and enhance biodiversity within Petworth. None of the sites has any international, national or local biodiversity designations. Any small pockets of biodiversity value identified on sites as part of the development management process, such as the Old School Pond within Site PW25, could be conserved through design and layout measures as part of any redevelopment proposal.
- 6.36 Sites PW23, PW25, PW31, PW18, PW19, PW21 and PW01 were considered to have a neutral outcome against Objective 5 which seeks to conserve and enhance the historic environment as development on these sites would not enhance or harm known heritage assets. Sites PW24, PW26, PW03, PW04 and PW05 were considered to have a negative outcome as these sites abut the Petworth Conservation Area. Development on these sites could have a negative impact on the setting and character of the Conservation Area. Although design could potentially help to reduce and / or mitigate any impact.
- 6.37 All sites were considered to achieve an uncertain outcome against Objective 6, which seeks to improve the health and well-being of the population and reduce inequalities in health and well-being. The reason being that no site would increase or decrease health, well-being or community facility provision within Petworth.

- 6.38 Sites PW23, PW31, PW24, PW25, PW18, PW19, PW21, and PW26 are considered to achieve positive outcomes against Objectives 7 and 8 which seek to improve accessibility to community facilities and improve the efficiency and safety of transport networks. All of these sites are within an acceptable and safe walking and cycling distance from key community facilities and services. Sites PW01, PW03, PW04 and PW05 were considered to achieve a negative outcome as although the sites are within an acceptable walking distance to key community facilities and services the route involves in places very narrow footpaths. As a result, it was considered that this might encourage the use of private vehicle trips to and from the town centre.
- 6.39 All sites were considered to achieve a positive outcome against Objectives 9, 11 and 12. All sites would help deliver new housing to meet the needs of existing and new residents. New housing would also comprise affordable housing, which will help reduce deprivation levels within Petworth. All sites are wholly Flood Risk Zone 1.

#### Why were the other Option(s) rejected?

- 6.40 Option 2 and 3 were rejected as Option 1 and refined Option 1 were considered, as referred above, to achieve a more positive outcome against the Sustainability Appraisal objectives, particularly against objectives 7 and 8, which seek to improve accessibility to community services and to improve the efficiency and safety of transport networks.
- 6.41 Although refined Option 1 incudes a small element of additional greenfield land to Option 1 and therefore has a potentially greater landscape impact in comparison with Option 1, the overall assessment considered both options achieved the same outcomes as any landscape. Of the two options, Option 1 was rejected, as it did not full align with the principles set out within the illustrative masterplan.
- 6.42 Option 2 and 3 was also rejected through public consultation feedback.

#### Policy H2: Integrated windfall sites

#### Summary of the Options:

6.43 To include a policy that encourages and supports windfall developments within the defined settlement boundary. Alternatively, reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework; and guidance within the Planning Practice Guidance.

Policy Alternatives				Sust	ainab	oility /	Appra	isal C	)bject	ives			
	1 2 3 4 5 6 7 8 9 10 11 12 13												
Infill Policy	+	0	0	+	?	+	+	+	+	0	0	0	0
No policy	+	0	0	+	?	+	+	0	+	0	0	0	0

6.44 The preferred option is to include a windfall policy.

#### Assessment Comment:

6.45 Both options achieve the same outcomes. However, including a policy is considered a more positive and proactive approach, particularly as it helps support the Neighbourhood Plan aspiration development policies.

## Why were the other Option(s) rejected?

6.46 The 'No Policy' option was rejected as the preferred option is considered to be a more positive and proactive approach.

## Policy H3: Housing Type and Mix

6.47 In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy H3 was refined to improve the clarity of the wording. The changes made are not considered to have significantly changed the policy approach or policy outcome.

## Summary of the Options:

6.48 To include a housing type and mix policy to ensure that development proposals provide the right type and mix of housing to meet local need. Alternatively, reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review.

Policy Alternatives	Sus	tainat	oility /	Appra	aisal (	Objec	tives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Housing type mix policy	0	0	0	0	0	0	0	0	++	0	+	0	0
No policy	0	0	0	0	0	0	0	0	+	0	+	0	0

Preferred Option:

6.49 The preferred option is to include a Petworth housing type and mix policy.

#### Assessment Comment:

6.50 Both options scored positively against the objectives. However, the preferred option performed slightly more effectively against the objectives as it ensures that the housing type and mix needs of Petworth residents now and in the future are met through future developments. Both options

may have a positive outcome toward reducing deprivation by ensuring that the appropriate size and type of accommodation is available to meet local needs.

### Why were the other Option(s) rejected?

6.51 The 'No Policy' option was rejected as it was considered to provide less certainty for the community over the type and mix of housing that would be supported by the Town Council and local community.

## **Policy H4: Affordable Housing Provision**

## Policy Refinement

6.52 In response to public consultation an alternative policy option has been identified which reverts to the adopted Saved policies of the Chichester District Local Plan 1999 affordable housing threshold of 11 dwellings or more. The option was developed in light of South Downs National Park feedback that the emerging Local Plan affordable housing policy was subject to change. The policy refinement ensures that the policy is based on a viability evidence base that has been subjected to independent examination. The refined policy is effectively the previous 'No policy option'. The 'No policy option' has therefore been renamed.

## Summary of the Options

6.53 To provide a policy setting out affordable housing provision requirements from new residential development over 6 dwellings; or reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review and the emerging South Downs National Park Local Plan.

Policy Alternatives	Sust	tainat	oility /	Appra	aisal (	Objec	tives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Affordable housing policy – 6_ dwelling threshold)	0	0	0	0	0	0	0	0	++	0	+	0	0
Affordable housing policy – Saved policy option (11 dwelling threshold)	0	0	0	0	0	0	0	0	++	0	+	0	0

## Preferred Option:

6.54 The preferred option is to include revert to the Saved policy option which requires affordable housing from all residential development comprising 11 or more dwellings.

#### Assessment Comment:

6.55 All three options scored equally as the policy requirements will require the delivery of much need affordable housing. Indeed all allocated sites within the Pre Submission Local Plan are above the 11 dwelling threshold and would therefore be required to deliver 40% affordable housing. Both options therefore score positively against objectives 9 and 11.

#### Why were the other Option(s) rejected?

6.56 Following public consultation feedback the policy option based on untested emerging Local Plan affordable housing threshold was rejected as it was noted that the emerging policy was still subject to change. In light of this, there was a risk that the Neighbourhood Plan policy would not be supported by evidence, particularly viability evidence. The 6-threshold policy approach was therefore rejected. The saved policy approach provided greater certainty that the Neighbourhood Plan would deliver affordable housing.

#### Policy H5: Rotherlea

#### Policy Refinement

- 6.57 In light of feedback from the Pre Submission Draft Neighbourhood Plan the policy has been refined to incorporate additional policy requirements. Notably these being measures to ensure:
  - a strong landscape-led approach is taken;
  - the site is comprehensively masterplanned with the adjoining Square Field allocation;
  - existing on-street car parking in Dawtrey Road is not lost as a result of any development on the site;
  - internal roads are designed to limit speeds to 20mph; and
  - protect the Old School Pond.

#### Summary of the Options

6.58 The Pre Submission Draft Policy H5 option allocates the site for residential use in accordance with Policy H1, but defines the extent of the developable area, and sets out site-specific design criteria. The refined policy is broadly the same as the Pre Submission Draft policy but with added specific policy wording regarding the need for: a comprehensive masterplan approach; protection of existing off street car parking provision and protection and where possible enhancement of the Old School Pond as public open space. The alternative 'No Policy' option does not define the extent of the developable area or important design criteria.

Policy Alternatives	Sust	ainab	oility A	Apprai	sal O	bjecti	ves						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Rotherlea site policy	0	0	0	0	0	0	0	0	0	0	0	0	0
No policy	0	0	0	0	0	0	0	0	0	0	0	0	0
Enhanced Rotherlea site policy	+	0	0	+	0	0	0	+	0	0	0	0	0

6.59 The preferred option is to include a policy allocating the site for residential use in accordance with Policy H1 and defined the extent of the developable area and site-specific design criteria, but with added policy measures as summarised above (the Enhanced Rotherlea site policy)

## Assessment Comment:

6.60 The outcomes for all three policy alternatives are broadly similar. However, the enhanced policy achieves a more positive outcome against objective 1 which seeks to conserve and enhance landscape character; objective 4 which seeks to conserve and enhance biodiversity within Petworth; and objective 8 in respect of improving transport safety for pedestrians and cyclists. The appraisal of the preferred option indicates that additional site-specific design criteria will help to ensure that development impact on character are mitigated, avoided or reduced. Clearly defining the extent of the site will assist in providing the community with certainty of the developable area.

#### Why were the other Option(s) rejected?

6.61 The 'No Policy' option and the Pre Submission Draft option was rejected, as the preferred option will ensure site-specific design measures are achieved. The added policy elements, suggested through public and statutory body feedback achieved more positive outcomes in comparison to the Pre-Submission Draft option and the 'No policy option'.

## Policy H6: The Square Field

## Policy Refinement:

- 6.62 In light of feedback from the Pre Submission Draft Neighbourhood Plan the policy has been refined to incorporate additional policy requirements. Notably these being measure to ensure:
  - a strong landscape-led approach is taken;
  - the site is comprehensively masterplanned with the adjoing Rotherlea site allocation;
  - existing on-street car parking in Dawtrey Road is not lost as a result of any development on the site;

- connect to and incorporate green infrastructure and green corridors;
- internal roads are designed to limit speeds to 20mph; and
- that the sites square edge character along the countryside edges is maintained.

#### Summary of the Options

6.63 The Pre Submission Neighbourhood Plan Policy H6 option allocates the site for residential use in accordance with Policy H1, but defines the extent of the developable area, and sets out design and landscape protection criteria. The enhanced Square Field is broadly the same as the Pre Submission policy but with enhanced policy measures as set out above. The alternative 'No Policy' option does not define the extent of the developable area or important design and landscape protection criteria.

Policy Alternatives	Sust	tainat	oility /	Appra	isal C	)bject	ives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
The Square Field site policy	?	0	0	0	0	0	0	0	0	0	0	0	0
No policy	?	0	0	0	0	0	0	0	0	0	0	0	0
Enhanced Square Field site policy	+	0	0	+	0	0	0	+	0	0	0	0	0

#### Preferred Option:

The preferred option is to include the enhanced policy options allocating the site for residential use in accordance with Policy H1 and defining the extent of the developable area and site-specific design and landscape protection criteria, but with added policy listed above.

#### Assessment Comment:

6.64 The outcomes for all three policy alternatives are broadly similar. However, the enhanced policy achieves a more positive outcome against objective 1 which seeks to conserve and enhance landscape character; objective 4 which seeks to conserve and enhance biodiversity within Petworth; and objective 8 in respect of improving transport safety for pedestrians and cyclists. The appraisal of the preferred option indicates that additional site-specific design criteria will help to ensure that development impact on character are mitigated, avoided or reduced. Clearly defining the extent of the site will assist in providing the community with certainty of the developable area.

#### Why were the other Option(s) rejected?

6.65 The 'No Policy' option and the Pre Submission Draft option was rejected, as the preferred option

will ensure site-specific design measures are achieved. The added policy elements, suggested through public and statutory body feedback achieved more positive outcomes in comparison to the Pre-Submission Draft option and the 'No policy option'.

## **Policy H7: Petworth South**

### Policy Refinement:

- 6.66 In light of feedback from the Pre Submission Draft Neighbourhood Plan the policy has been refined to incorporate additional policy requirements. Notably these being measure to ensure:
  - a strong landscape-led approach is taken the masterplan takes account of landscape character as well as urban character;
  - the existing wastewater pipe crossing the sites is taken into account as part of the detailed site masterplanning in due course;
  - connect to and incorporate green infrastructure and green corridors;
  - internal roads are designed to limit speeds to 20mph; and
  - consideration is given to investigating the potential to create and deliver a new pedestrian and cycle link between the site and Grove Lane

## Summary of the Options:

6.67 The Pre Submission Neighbourhood Plan Policy H7 option allocates the site for residential use in accordance with Policy H1, but defines the extent of the developable area, and sets out design and landscape protection criteria. The enhanced Petworth South policy option is broadly the same as the Pre Submission policy but with the enhanced policy measures as set out above. The alternative 'No Policy' option would not define the extent of the developable area site-specific design and landscape protection criteria.

Policy Alternatives	Sust	ainab	oility A	Apprai	sal O	bjecti	ves						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Petworth south site policy	?	0	0	0	0	0	++	++	0	0	0	0	0
Enhanced Petworth south site policy	+	0	0	+	0	0	++	++	0	0	0	0	0
No policy	?	0	0	0	0	0	+/?	+/?	0	0	0	0	0

6.68 The preferred option is to include a enhanced Policy allocating the site for residential use in accordance with Policy H1 and define the extent of the developable area and site-specific design and landscape protection criteria but with the added policy measures as set out above.

#### Assessment Comment:

- 6.69 The outcomes for all three policy alternatives are broadly similar. However the Pre-Submission option and the Enhanced Option achieved significant positive outcomes against objectives 7 and 8. The principal reason being that the policy would ensure the delivery of a new access road and drop off area at Petworth Primar School.
- 6.70 Against the other options, the enhanced policy achieves a more positive outcome against objective 1 which seeks to conserve and enhance landscape character; and objective 4 which seeks to conserve and enhance biodiversity within Petworth. The appraisal of the preferred option indicates that additional site-specific design criteria will help to ensure that development impact on character are mitigated, avoided or reduced. Clearly defining the extent of the site will assist in providing the community with certainty of the developable area.

## Why were the other Option(s) rejected?

6.71 The 'No Policy' option and the Pre Submission Draft option was rejected, as the preferred option will ensure site-specific design measures are achieved. The added policy elements, suggested through public and statutory body feedback achieved more positive outcomes in comparison to the Pre-Submission Draft option and the 'No policy option'.

## Policy ESD1: Character and Design

#### Policy Refinement :

6.72 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy ESD1 was refined to improve the clarity of the wording. The changes made are not considered to have significantly changed the policy approach or policy outcome.

## Summary of the Options

6.73 To include a policy that sets out Petworth specific design guidance to inform development proposals; or reliance on the strategic design policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, and the National Planning Policy Framework.

Policy Alternatives	Sust	tainab	oility A	Apprai	sal O	bjecti	ves						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Character and design	+	0	0	0	++	0	0	0	0	0	0	0	0
No policy	?	0	0	0	?	0	0	0	0	0	0	0	0

The preferred option is to include a policy setting out specific design guidance to inform development proposals.

## Assessment Comment:

6.74 Both options scored positively outcome. However, the Petworth specific design guidance policy will ensure development proposals better reflected local character, design and materials.

## Why were the other Option(s) rejected?

6.75 The development management decision-making process at the National Park level may not fully ensure that development proposals have been influenced by local character, materials and design principles. The 'No Policy' option was rejected as it was considered to provide the community with less certainty.

## Policy ESD2: Housing Density

## Policy Refinement:

6.76 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy ESD2 was refined to improve the clarity of the wording and to recognise that higher densities within the town centre maybe more in keeping with the historic town centre core.

## Summary of the Options

6.77 To include a policy that sets out Petworth specific residential density guidance to inform development proposals; to include a refined policy which acknowledges higher density within the defined town centre maybe more in keeping with the historic core of the town; or reliance on the strategic design policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, and the National Planning Policy Framework.

Policy Alternatives	Sust	tainab	oility A	Apprai	sal O	bjecti	ves						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Housing density	+	0	0	0	0	0	0	0	+	0	0	0	0
No policy	?	0	0	0	0	0	0	0	+/?	0	0	0	0
Refined housing density policy	+	0	0	0	+	0	0	0	+	0	0	0	0

6.78 The preferred option is to include a policy setting out Petworth specific residential density thresholds, but refined to acknowledge higher densities maybe appropriate within the historic core of the defined town centre.

## Assessment Comment:

6.79 Both the Petworth specific density policies were considered to achieve greater certainty that a policy outcome would be achieved. Providing a density range was considered to have a positive outcome in ensuring the developed towards the edge of the settlement boundary minimised impact on the landscape character. The minimum density helps to ensure that best use of land is made to ensure everyone has an opportunity to live in a good quality home (objective 9). The refined policy option also achieved a more positive outcome against objective 5 as it provides density flexibility within the town centre to achieve densities more in keeping with the historic core.

#### Why were the other Option(s) rejected?

6.80 The development management decision-making process at the National Park level was not considered to provide the same level of certainty for developers and housebuilders over the density that would be supported by Petworth Town Council and the local community. The 'No Policy' option was therefore rejected. The Pre-Submission option was also rejected as it had the potential to provide less positive historic objective outcomes for windfall developments within the historic core of the town centre.

## Policy ESD3: Requirements for a Design and Access Statement

## Policy Refinement:

6.81 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy ESD3 was refined to improve the clarity of the wording. The changes made are not considered to have significantly changed the policy approach or policy outcome.

#### Summary of the Options:

6.82 To include a policy that enables the residents and businesses within the Neighbourhood Area to actively shape and influence development proposals coming forward through clearly setting out the aspects to be addressed within Design and Access Statements submitted as part of qualifying planning applications. An alternative option would be to rely on the existing development management decision-making process led by the South Downs National Park Authority.

Policy Alternatives	Sust	ainab	ility A	pprai	sal Ob	ojectiv	es						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Design and Access Statement detail	+	+	+	+	+	+	0	+	+	0	0	0	0
No policy	+/?	+/?	+/?	+/?	+/?	+/?	0	+/?	+/?	0	0	0	0

#### Preferred Option:

6.83 The preferred option is to include a policy setting out the key aspects to be addressed within Design and Access Statements within the Neighbourhood Area.

#### Assessment Comment:

6.84 Both options scored positive outcomes. However, the Design and Access Statement policy will help to ensure that the design aspects, which are considered locally important, are fully considered early in the design process.

#### Why were the other Option(s) rejected?

6.85 The development management decision-making process at the National Park level does not ensure that all neighbourhood level important design aspects will be fully addressed and considered. The 'No Policy' option was therefore rejected.

#### Policy ESD4: Preserving Local Green Space

#### Policy Refinement:

6.86 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy ESD4 was refined to improve the clarity of the wording with regard to national policy and to also remove the listed allotments and the proposed large areas which statutory body consultation feedback suggested were too large to meet the national policy criteria. These being: (i) The Shimmings, (ii) Sheepdown and (iii) Rosemary Gardens. The changes made are not considered to have significantly changed the policy approach or policy outcome.

#### Summary of the Options:

6.87 To designate Local Green Spaces which are demonstrably special to Petworth residents; rely on market and community actions and / or strategic National Park Authority policies and strategies to protect these locally important spaces.

Policy Alternatives	Sust	ainab	oility A	Apprai	sal O	bjecti	ves						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Preserving Local Green Space	+	+	0	+	+	+	+	0	0	0	0	0	0
No policy	+/?	0	0	+/?	+/?	+/?	0	0	0	0	0	0	0

## Preferred Option:

6.88 To include a policy and designation of Local Green Spaces.

## Assessment Comment:

6.89 The preferred option achieves more certain positive outcomes against the objectives than the 'No Policy' alternative.

## Why were the other Option(s) rejected?

6.90 The 'No Policy' option was rejected as the preferred option was considered to provide greater certainty to the local community over the continued protection of locally special green spaces.

#### Policy EDS5: Public Open Spaces

#### Policy Refinement:

6.91 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy ESD5 was refined to improve the clarity of the wording. The changes made are not considered to have significantly changed the policy approach or policy outcome.

#### Summary of the Options:

6.92 To include a policy that requires improvements to green space provision within the Neighbourhood Area; or reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework and guidance within the Planning Practice Guidance.

Policy Alternatives	Sust	ainab	ility A	pprai	sal Ot	ojectiv	'es						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Public Open	+	+	0	+	+	+	+	0	0	0	0	0	0
spaces													
No policy	+/?	0	0	+/?	+/?	+/?	0	0	0	0	0	0	0

6.93 The preferred option is to include a policy requiring delivery of public open space on sites allocated for residential development within the Neighbourhood Plan.

#### Assessment Comment:

6.94 Both options scored positively against the objectives. However, the preferred option was considered to achieve more certain outcomes over the delivery of public green space.

#### Why were the other Option(s) rejected?

6.95 The 'No Policy' option was rejected as the preferred option was considered to be a more positive, certain and proactive approach.

#### Policy EDS6: Landscape and Visual Impact

#### Policy Refinement:

6.96 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy ESD6 was refined to improve the clarity of the wording regarding landscapeled masterplanning In order to help protect what are considered locally to be important landscape and recreation value areas the a policy refinement was made to incorporate indicative key view corridors for The Shimmings and Sheepdown. As referred above these areas were removed from Policy ESD4 was they were considered too large to comply with national guidance on Local Green Spaces. The changes made are not considered to have significantly changed the policy approach or policy outcome.

#### Summary of the Options:

6.97 To include a policy that requires landscape and visual impact investigations for all new development that may have an impact on the character of the South Downs National Park. Alternatively rely on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, National Planning Policy Framework, and guidance within the Planning Practice Guidance.

Policy Alternatives	Sust	ainab	ility A	pprais	al Ob	jectivo	es						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Landscape and visual impact	++	0	0	+	+	0	0	0	0	0	0	0	0
No policy	+/?	0	0	+/?	+/?	0	0	0	0	0	0	0	0

6.98 The preferred option is to include a policy requiring appropriate landscape and visual impact investigations for all new development on the edge of Petworth.

## Assessment Comment:

6.99 Both options scored positively against the objectives. However, the preferred option was considered to achieve more certain outcomes over ensuring that development proposals have been informed by a design led approach to minimise visual impact on the countryside surrounding Petworth.

## Why were the other Option(s) rejected?

6.100 The 'No Policy' option was rejected as the preferred option was considered to provide greater certainty that landscape and visual impacts would be investigated and appropriately mitigated, reduced or avoided through a landscape led approach to development.

## Policy ESD7: Biodiversity and Trees

#### Policy Refinement:

6.101 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy ESD7 was refined to improve the clarity of the wording. The changes made are not considered to have significantly changed the policy approach or policy outcome.

#### Summary of the Options:

6.102 To include a policy that seeks to protect the natural environment and trees and promote the protection and enhancement of biodiversity corridors and networks. Alternatively, reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework and guidance within the Planning Practice Guidance.

Policy Alternatives	Sust	ainab	oility A	Apprai	isal O	bjecti	ves						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Biodiversity and trees	+	0	0	++	+	+	0	0	0	0	0	0	0
No policy	+/?	0	0	+/?	+/?	+/?	0	0	0	0	0	0	0

6.103 The preferred option is to include a biodiversity and trees policy.

### Assessment Comment:

6.104 The inclusion of a biodiversity policy achieves a significant positive outcomes for supporting and protecting biodiversity and positive outcomes for helping to protect the town's urban and rural character. The No Option achieve less certain delivery outcomes.

#### Why were the other Option(s) rejected?

6.105 The 'No Policy' option was rejected as the preferred option was considered to be a more positive, certain and proactive approach.

## Policy ESD8: Sustainable Design

#### Summary of the Options:

6.106 To include a policy that encourages development proposals to incorporate low carbon construction and energy efficiency measures; or reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework and guidance within the Planning Practice Guidance.

Policy Alternatives	Sus	tainat	oility /	Appra	aisal (	Objec	tives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Sustainable design	0	++	++	0	0	0	0	0	0	0	0	0	0
No policy	0	+	+	0	0	0	0	0	0	0	0	0	0

Preferred Option:

6.107 The preferred option is to support and encourage the construction of exemplar high quality sustainable development. The policy approach achieves a significant positive outcome against seeking to address the causes of climate change.

#### Assessment Comment:

6.108 Both options scored positively against the objectives. However, the preferred option achieved significant positive outcomes against proactively seeking to address the causes of climate change.

#### Why were the other Option(s) rejected?

6.109 The 'No Policy' option was rejected as the preferred option is a more positive and proactive approach.

## Policy WS1: Petworth Town Centre

#### Summary of the Options:

6.110 To include a Petworth Town Centre specific policy or reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework and guidance within the Planning Practice Guidance.

Policy Alternatives	Sust	ainab	ility A	pprai	sal Ot	ojectiv	/es						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Petworth Town centre	0	0	0	0	+	0	+	+	0	++	+	0	++
No policy	0	0	0	0	+/?	0	+/?	+/?	0	+/?	+/?	0	+/?

#### Preferred Option:

6.111 The Preferred Option is the inclusion of a Petworth Town Centre specific policy. This new policy will encourage new retail, leisure, hotel and office development, which should be located within the defined town centre boundary, or follow a sequential approach under specific criteria.

#### Assessment Comment:

6.112 Both options scored positively against the objectives. However, the preferred option performed more effectively against the objectives as it provides a locally specific policy framework to support Petworth Town Centre's vitality and viability.

#### Why were the other Option(s) rejected?

6.113 The 'No Policy' option was rejected as the preferred option was a more positive and proactive approach to Petworth Town Centre.

#### Policy WS2: Visitor Economy

#### Policy Refinement:

6.114 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy WS2 was refined to improve the clarity of the wording. The changes made are not considered to have significantly changed the policy approach or policy outcome.

#### Summary of the Options:

6.115 To include a visitor economy policy or reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework and guidance within the Planning Practice Guidance.

Policy Alternatives	Sust	tainab	oility A	Apprai	sal O	bjecti	ves						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Visitor Economy	0	0	0	0	0	0	0	+	0	+	0	0	++
No policy	0	0	0	0	0	0	0	0	0	+/?	0	0	+/?

6.116 The preferred option is the inclusion of a visitor economy policy, which would support Petworth as a tourist destination.

## Assessment Comment:

6.117 The preferred option achieves more positive outcomes against the objectives than the 'No Policy' alternative, particularly supporting the tourism economy within Petworth Town Centre.

## Why were the other Option(s) rejected?

6.118 The 'No Policy' option was rejected as the preferred option is a more positive and proactive approach.

## Policy WS3: Hampers Common Industrial Estate

### Summary of the Options:

6.119 To include a policy protecting Hampers Common Industrial Estate as an important local employment site; or reliance on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework and guidance within the Planning Practice Guidance.

Policy Alternatives	Sust	ainab	ility A	pprais	al Ob	jectivo	es						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Hampers Common Industrial Estate site policy	0	0	0	0	0	0	0	0	0	+	+	0	0
No policy	0	0	0	0	0	0	0	0	0	+/?	?	0	0

Preferred Option:

6.120 The preferred option is the inclusion of Hampers Common Industrial Estate protection policy.

#### Assessment Comment:

6.121 The preferred option achieves more positive and certain outcomes against the objectives than the 'No Policy' alternative, particularly support for the local Petworth economy. Why were the other Option(s) rejected?

6.122 The 'No Policy' option was rejected as the preferred option was considered to be a more positive and proactive approach.

#### Policy WS4: Land east of Hampers Common Industrial Estate

#### Policy Refinement:

6.123 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy WS4 was refined include reference to the need to prepare and submit an LVIA. The changes made are not considered to have significantly changed the policy approach or policy outcome.

## Summary of the Options:

6.124 The Policy WS4 option allocates the site for B1, B2 and B8 business activities. Alternatively, the 'No Policy' option requires any proposals for the site to be assessed against the existing policies within the higher level Development Plan and the NPPF; or the site is allocated within the emerging Local Plan. The site currently lies outside the existing defined settlement boundary.

Policy Alternatives	Sust	tainat	oility /	Appra	aisal (	Objec	tives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Land east of Hampers Common Industrial Estate	-	0	0	0	0	0	0	0	0	++	+	0	0
No policy	0	0	0	0	0	0	0	0	0	?	?	0	0

Preferred Option:

6.125 The preferred option is to include a policy allocating the site for B1, B2 and B8 uses.

## Assessment Comment:

6.126 Both of the options scored well against the framework objectives. However, the inclusion of a policy supports local employment opportunities. Given the site is located on the edge of the settlement there are potential landscape impact issues associated with development on the site. However, and landscape impacts could be mitigated or avoidance measures put in place as part of the design and development management process. Policy wording has been included to ensure appropriate consideration is given to landscape impact as part of the development management process. There is uncertain outcomes under the No Policy option on the basis that the South Downs National Park Authority may look to allocate employment land at Petworth as part of the Local Plan process in order to meet employment land needs across the National Park.

Why were the other Option(s) rejected?

6.127 The 'No Policy' option was rejected as it was considered a less positive and uncertain option to helping to deliver future local employment land needs.

## **Policy GA1: Parking Requirements**

### Policy Refinement:

6.128 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy GA1 was refined to improve the clarity of the wording regarding visitor and resident parking. The changes made are not considered to have significantly changed the policy approach or policy outcome.

## Summary of the Options:

6.129 To include a policy setting out residential car parking space requirements and protection measures against the loss of existing residential car parking spaces below the Neighbourhood Plan standards; or rely on strategic South Downs National Park Authority and West Sussex County Council policy mechanisms.

Policy Alternatives	Sus	tainat	oility /	Appra	aisal (	Objec	tives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Parking requirements	0	0	0	0	0	0	0	+	0	0	0	0	0
No policy	0	0	0	0	0	0	0	?	0	0	0	0	0

## Preferred Option:

6.130 The Preferred Option is to include a policy setting out residential car parking space requirements and car parking space loss protections.

## Assessment Comment:

6.131 The preferred option scores positively against the objectives, particularly in relation to helping to ensure pedestrian and cyclist safety on residential roads.

#### Why were the other Option(s) rejected?

6.132 The 'No Policy' option was rejected, as the preferred option was the more positive approach on highway safety.

## **Policy GA2: Pedestrian and Cycle Movement**

### Policy Refinement:

6.133 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy GA23 was refined to improve the clarity of the wording. To avoid policy duplication the developer contributions element of the policy has also been moved to the Delivery section of the Neighbourhood Plan The changes made are not considered to have significantly changed the policy approach or policy outcome.

#### Summary of the Options:

6.134 To include a policy encouraging good walking and cycling connections to the town centre from allocated sites; or rely on strategic South Downs National Park Authority and West Sussex County Council policy mechanisms.

Policy Alternatives	Sus	tainat	oility /	Appra	aisal (	Objec	tives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Pedestrian and cycle movement	0	0	+	0	0	+	0	+	0	0	0	0	0
No policy	0	0	0	0	0	?	0	?	0	0	0	0	0

## Preferred Option:

6.135 The Preferred Option is to include a policy encouraging the creation of a safe walking and cycling connections.

#### Assessment Comment:

6.136 The preferred option scores positively against the objectives, particularly in relation to improving health and transport choices.

## Why were the other Option(s) rejected?

6.137 The 'No Policy' option was rejected, as the preferred option was the more positive approach.

#### Policy GA3: To protect and increase car-parking capacity at Pound Street Car Park

## Summary of the Options:

6.138 To include a policy setting out support for measures to provide additional car parking capacity in Pound Street Car Park; or rely on strategic Chichester District Council policy / strategy mechanisms.

Policy Alternatives	Sust	tainat	oility /	Appra	aisal (	Objec	tives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Pond street car park	0	0	0	0	0	0	+	+	0	+	0	0	+
No policy	0	0	0	0	0	0	0	0	0	0	0	0	0

6.139 The Preferred Option is to include a policy setting out support for measures to provide additional car parking capacity in Pound Street Car Park.

## Assessment Comment:

6.140 The preferred option scores positively against the objectives, particularly in relation to improving the transport network and highway safety around the town; helping to increase accessibility to community facilities and services within the town centre, and helping support local business and tourism.

## Why were the other Option(s) rejected?

6.141 The 'No Policy' option was rejected, as the preferred option was considered the more positive approach across a wide range of economic and social objectives.

## Policy LW1: Community and Leisure Facilities

## Policy Refinement:

6.142 In light of feedback from the Pre Submission Neighbourhood Plan consultation, Policy LW1 and LW5 have been merged to simplify and reduce the number of policies within the Plan. The changes made are not considered to have significantly changed the policy approach or policy outcome.

## Summary of the Options:

6.143 To include a policy actively encouraging and supporting the renewal and enhancement of existing community facilities; or to rely on market and community actions.

Policy Alternatives	Sus	tainat	oility /	Appra	aisal (	Objec	tives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Community and Leisure facilities	0	0	0	0	0	+	++	0	0	0	0	0	0
No policy	0	0	0	0	0	?	?	0	0	0	0	0	0

6.144 The preferred option is to include a policy outlining that support will be given to proposals that support the renewal and enhancement of existing and provision of new community facilities.

## Assessment Comment:

6.145 The Preferred Option assessed outcomes were more positive than the No Policy option.

### Why were the other Option(s) rejected?

6.146 The 'No Policy' option was rejected as the preferred option was considered to achieve more positive outcomes against improving access to community facilities and services as well as helping to maintain and improve health, well-being and community cohesion and community groups.

## Policy LW2: Playing fields and Sports Facilities

#### Policy Refinement:

6.147 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy LW2 was refined to improve the clarity of the wording. The changes made are not considered to have significantly changed the policy approach or policy outcome.

### Summary of the Options

6.148 To include a policy to retain and where possible enhance existing playing fields and sports facilities. Alternatively, rely on the strategic policies within the Saved polices of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework; guidance within the Planning Practice Guidance; and other plans, policies and strategies by other bodies such as Sport England.

Policy Alternatives	Sust	ainab	oility A	Apprai	sal O	bjecti	ves						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Playing fields and sports facilities	0	0	0	0	0	+	+	0	0	0	0	0	0
No policy	0	0	0	0	0	?	?	0	0	0	0	0	0

#### Preferred Option:

6.149 To include a policy to retain and where possible enhance existing playing fields and sports facilities within Petworth.

Assessment Comment:

6.150 The Preferred Option assessed outcomes were more positive and is considered to provide greater certainty to the community over the continued ability to access playing fields and sports facilities for health and well-being.

#### Why were the other Option(s) rejected?

6.151 The 'No Policy' option was rejected as the preferred option achieved a more certain positive outcome against improving access to community facilities and services as well as helping to maintain and improve health, well-being and community cohesion and community groups.

## Policy LW3: Assets of Community Value

#### Summary of the Options:

6.152 To designate assets of community value to ensure their protection over the period covered by the Neighbourhood Plan unless it is demonstrated that development or redevelopment is to the benefit of the local community. Alternatively, rely on market and community actions and / or strategic National Park Authority policies and strategies to protect locally important assets.

Policy Alternatives	Sus	tainat	oility /	Appra	aisal (	Objec	tives						
	1	2	3	4	5	6	7	8	9	10	11	12	13
Assets of community value	0	0	0	0	0	+	+	0	0	0	0	0	0
No policy	0	0	0	0	0	0	?	0	0	0	0	0	0

## Preferred Option:

6.153 To include a policy and designation of assets of community value.

#### Assessment Comment:

6.154 The preferred option achieves a more positive outcome against accessibility to local community facilities and services than the 'No Policy' alternative.

#### Why were the other Option(s) rejected?

6.155 The 'No Policy' option was rejected as the preferred option was considered to be a more positive and proactive approach.

## Policy LW4: Retention of Assets of Community Value

#### Summary of the Options:

6.156 To retain assets of community value by supporting developments that are a benefit to the local community or resisted those that will cause harm. Alternatively, rely on community actions and / or strategic National Park Authority and strategies to retain assets of community value.

Policy Alternatives	Sust	Sustainability Appraisal Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12	13
Retention of assets of community value	0	0	0	0	0	+	+	0	0	0	0	0	0
No policy	0	0	0	0	0	0	?	0	0	0	0	0	0

#### Preferred Option

6.157 To include a policy retaining assets of community value.

#### Assessment Comment:

6.158 The preferred option insures the retention of assets of community value and therefore achieves a more positive outcome than the 'No Policy' alternative.

#### Why were the other Option(s) rejected?

6.159 The 'No Policy' was rejected as the preferred option was considered to be a more positive and proactive approach.

#### Policy D1: Infrastructure Delivery

#### Policy Refinement:

6.160 Policy Refinement In light of feedback from the Pre Submission Neighbourhood Plan consultation Policy D1 was refined to improve the clarity of the wording. The changes made are not considered to have significantly changed the policy approach or policy outcome.

#### Summary of the Options:

6.161 To include a policy clearly setting out that new development should contribute to the provision of new social and community infrastructure; or to leave emphasis of the importance of providing

new infrastructure to negotiations as part of the South Downs National Park Authority decisionmaking process.

Policy Alternatives	Sust	Sustainability Appraisal Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12	13
Infrastructure delivery	0	0	0	0	0	+	+	+	+	0	+	+	0
No policy	0	0	0	0	0	+/?	+/?	+/?	+/?	0	+/?	+/?	0

Preferred Option:

6.162 The preferred option is to include a policy outlining the need for new development proposals to contribute to the provision of new social and community infrastructure

## Assessment Comment:

6.163 Both options scored positively against the objectives. However, the preferred option was considered to perform slightly more effectively against the objectives as it ensures that essential local facilities and community services are provided as part of all new development proposals.

## Why were the other Option(s) rejected?

6.164 The 'No Policy' option was rejected as it was considered essential that new development mitigates the impact of increasing demand on the full range of local facilities and community services, in Petworth.

## 7.0 Assessment Conclusion

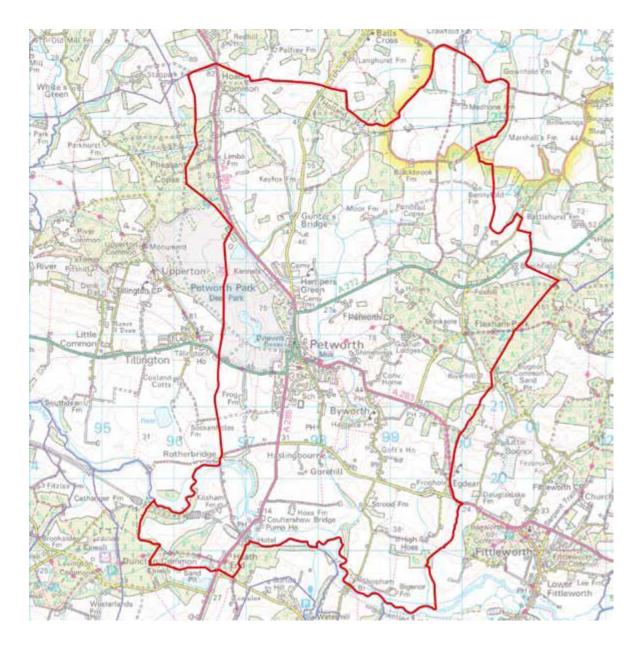
- 7.1 The conclusion of the assessment of the Petworth Neighbourhood Plan key principles and policies is that they will have no significant negative environmental effects and will promote sustainable development. A number of key principles and policies provide significant benefits as shown through the appraisal above. In meeting the level growth prescribed by the emerging South Downs National Park Local Plan a number of site allocations were necessary on greenfield land outside the currently defined settlement boundary. The principle reason being, due to the limited availability of deliverable and developable previously developed land within the existing settlement boundary. The policies have been clearly selected and drafted to ensure that any potential for negative impacts is minimised through site selection and effective policy wording.
- 7.2 Preparing the Petworth Neighbourhood Plan has required the use of planning judgement to strike the right balance between the technical suitability and community acceptability of the Neighbourhood Plan.
- 7.3 In some cases, this can lead to policies that may not be the most sustainable of all the potential choices made, but they are nonetheless sufficiently sustainable so that they will lead to no significant negative environmental effects. This is the most important test required by the EU Directive on SEA and the 2004 Regulations.
- 7.4 However, the conclusion remains that in a number of cases, the Petworth Neighbourhood Plan should deliver positive effects for local residents and businesses as Petworth meets its development needs in the period up to 2033. Reasonable alternative policy options have been assessed within this report to compare and contrast the options chosen, but in no case does the alternative perform better, and in most cases as well, against the chosen policy and there is therefore no case for policy changes as a result.

## 8.0 Mitigating Adverse Effects

- 8.1 SEA guidance requires measures to prevent, reduce or offset significant adverse effects of implementing the plan. Where practical this report identifies the likely negative and positive impacts each policy has on achieving sustainability objectives based on the framework set out. It demonstrates that the policies of the Petworth Neighbourhood Plan will positively contribute towards delivering the social, economic and environmental objectives set out in the SA framework.
- 8.2 Where any potential and negative effects were identified, it was concluded that the policies in the Petworth Neighbourhood Plan, the Saved Policies of the Chichester Local Plan 1999; the emerging polices of the South Downs National Park Local Plan; or the National Planning Policy Framework adequately alleviated or mitigated the impacts, particularly over the medium to longer term.

## 9.0 Monitoring the Environmental Effects of the Plan

- 9.1 Petworth Town Council and the South Downs National Park Authority will jointly monitor the effectiveness of the implementation of the Neighbourhood Plan using available data. The annual South Downs National Park Authority Monitoring Report will provide some data at this level.
- 9.2 The purpose of monitoring is to provide information on the social, environmental and economic effects of planning policy documents help determine the extent to which objectives, targets and programmes are being met. Monitoring will also allow the Town Council to know if it is necessary to trigger contingency plans, should performance fall below expectations, or circumstances significantly change.



## Designated Petworth Neighbourhood Plan Area

## SEA Quality Assurance Checklist

The Quality Assurance Checklist below has been used to ensure that requirements of the SEA Directive have been met and fully integrated into the sustainability process covered in this document. The Quality Assurance Checklist covers both the technical and procedural steps of the sustainability appraisal process and will be updated as the different stages are reached.

Requirements of the SEA Directive	Where met in this Report
The Plan's purpose and objectives are made clear	See Section 1 and 4 of this Report
Sustainability issues including international and EC objectives are considered in developing objectives and targets	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk
SA Objectives are clearly set out and linked to indicators and targets where appropriate	Section 2 of this Report and Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth- tc.gov.uk
Links with related plans, programmes and targets are identified and explained	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk
Conflicts that exist between SA objectives and other plan objectives are identified and described	See Section 4 of this Report
Scoping	
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA report	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk
The appraisal focuses on significant issues	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk
Technical, procedural and other difficulties encountered are	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk

Requirements of the SEA	Where met in this Report
Directive	
discussed; assumptions and uncertainties are made explicit	
Reasons are given for eliminating issues from further consideration	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk
Options / Alternatives	
Realistic alternatives are considered for key issues and the reasons for choosing them are documented	See Section 3, 5 and 6 of this Report
Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant	See Section 3, 5 and 6 of this Report
The sustainability effects (both adverse and beneficial) of each alternative are identified and compared	See Section 6 of this Report
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained	See Section 6 and 7 of this Report
Reasons are given for the selection or elimination of alternatives	See Section 3, 5, 6 and 7 of this Report
Baseline Information	
Relevant aspects of the current state of the environment and their evolution without the plan are described	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk
Characteristics of the area likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk

Requirements of the SEA Directive	Where met in this Report
Difficulties such as deficiencies in information or methods are explained	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk
Prediction and evaluation of likely	y significant effects
Likely significant social, environmental and economic effects are identified including those listed in the SEA Directive (biodiversity, population, human health, flora, fauna, soil, water, air, climate, material assets, cultural heritage and landscape) as relevant	See Section 6 of this Report
Both positive and negative effects are considered and where practicable the duration of effects (short, medium or long term) is addressed	See Section 6 of this Report
Likely secondary, cumulative and synergistic effects are identified where practicable	See Section 6 of this Report
Inter-relationships between effects are considered where practicable	See Section 6 of this Report
Where relevant, the prediction and evaluation of effects make use of accepted standards, regulations and thresholds	See Section 6 of this Report
Methods used to evaluate the effects are described	See Section 2 and 3 of this Report
Mitigation Measures	1
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan	See Section 8 of this Report

Requirements of the SEA Directive	Where met in this Report
Issues to be taken into account in development consents are identified	See Section 8 of this Report
The Sustainability Appraisal Repo	ort
Is clear and concise in layout and presentation	Yes
Uses simple, clear language and avoids or explains technical terms	Yes
Use maps and other illustrations where appropriate	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk
Explains the methodology used	See Section 3 of this Report
Explains who was consulted and what methods of consultation were used	See Section 1 and the Petworth Neighbourhood Plan Consultation Statement
Identified sources of information, including expert judgement and matters of opinion	Sustainability Appraisal Scoping Report (February 2016) available online at: ww.petworth-tc.gov.uk
Contains a Non Technical Summary	Included at the front of this Report
Consultation	·
The SA is consulted on as an integral part of the plan making process	As part of the February 2016 and the April to May 2017 consultations
The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the Draft Plan and SA Report	As part of the February 2016 and the April to May 2017 consultations

Requirements of the SEA

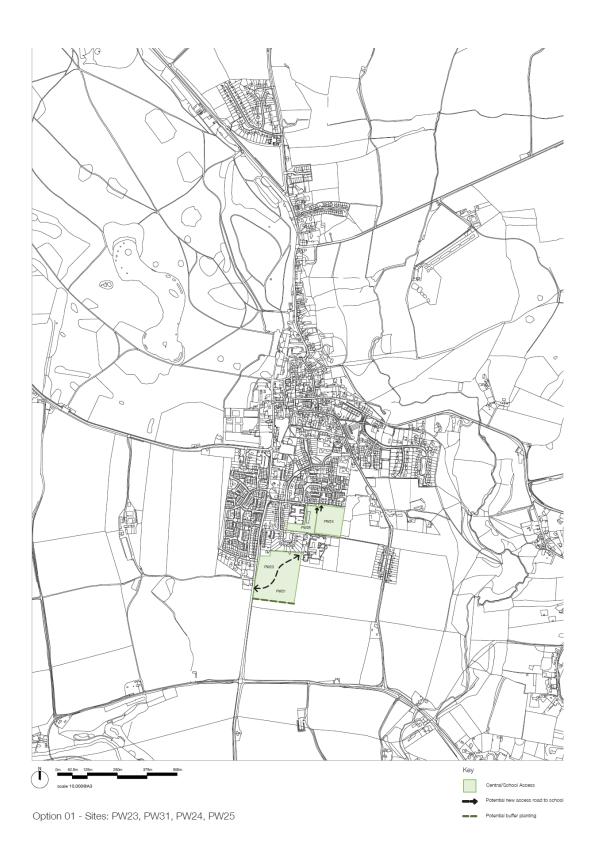
Where met in this Report

Directive

Decision making and information	and the Decision		
The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan	At the next stage in the plan-making process		
An explanation is given of how they have been taken into account	To be included in the final SA Report		
Reasons are given for choices in the adopted plan, in light of other reasonable options considered	To be included in the final SA Report		
Monitoring Measures			
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SA	N/A		
Monitoring is used, where appropriate during implementation of the plan to make good deficiencies in baseline information in the SA	Post plan adoption		
Monitoring enables unforeseen adverse effects to be identified at an early stage (these effects may include predictions which prove to be incorrect)	Post plan adoption		
Proposals are made for action in response to significant adverse effects	Post plan adoption		

# Appendix 3

## **Housing Site Options Plans**

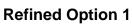


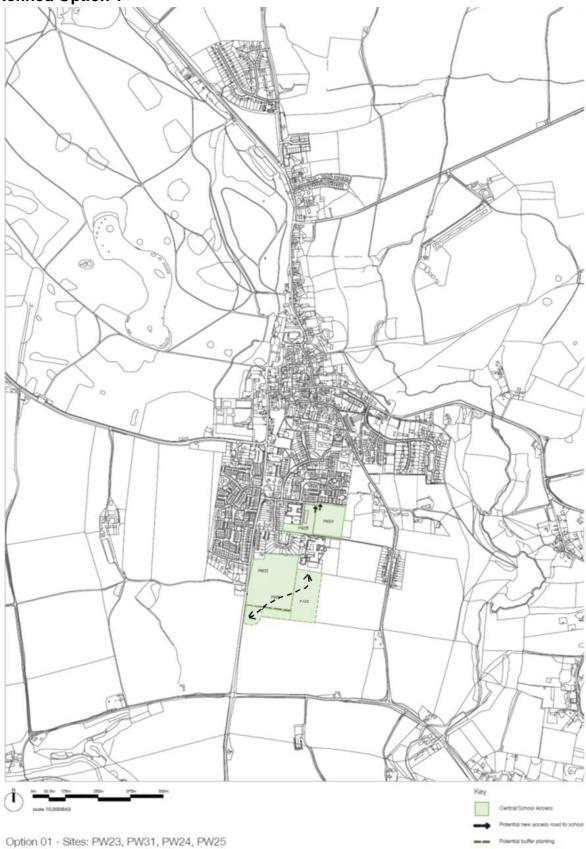


Option 02 - Steet: PW18, PW19, PW21



Option 03 - Sites: PW01, PW05, PW06





# Appendix 4

## SA Objective Assessment Protocols

	SA Objective	Rating	Assessment Protocols for the Options
1	To conserve and enhance	++	No international or national designations.
	landscape character		Site allocation is previously developed land.
			Will protect existing open spaces and countryside.
		+	No international or national designations.
			Site allocation is partly previously developed land.
			Potential to protect existing open spaces and
			countryside.
		0	No positive or negative effect on the objective.
		-	Potential for negative impacts on an international or
			national designation.
			Will result in a negative impact on an international or
			national designation.
		?	Uncertain effect on the objective.
2	To ensure the Petworth	++	Will significant improve the communities preparation
	community is prepared for the		of the impacts of climate change
	impacts of climate change	+	Will improve the communities preparation of the
			impacts of climate change
		0	No positive or negative effect on the objective.
		-	Will result in a negative impact on climate change
			resilience
			Will significantly worsen climate change resilience
		?	Uncertain effect on the objective
3	To address the causes of	++	Will result in significant reductions in greenhouse
	climate change through		gases.
	reducing emissions of	+	Has the potential to reduce the causes of
	greenhouse gases		greenhouse gases.
		0	No positive or negative effect on the objective.
		-	Potential to increase the causes of greenhouse
			gases
			Will result in significant increases in greenhouse
			gases
		?	Uncertain effect on the objective
4	To conserve and enhance the	++	No known international or national restrictions or
	biodiversity within Petworth		designations and will result in a net gain in
			biodiversity.
		+	No known international or national restrictions or
			designations and has the potential to result in a net
			gain in biodiversity.
		0	No positive or negative effect on the objective.
			Local designations and potential to result in the loss
			of biodiversity

	SA Objective	Rating	Assessment Protocols for the Options
			International and national restrictions. Will result in the loss of biodiversity
		?	Uncertain effect on the objective
5	Conserve and enhance the historic environment, heritage assets and their settings.	++	No impact on known international, national or local heritage or archaeological assets and will protect and enhance an existing asset
		+	No impact on known international, national or local heritage or archaeological assets
		0	No positive or negative effect on the objective.
		-	Potential impact on international or national heritage or archaeological asset
			Significant impact on international or national heritage or archaeological asset
		?	Uncertain effect on the objective
6.	To improve the health and well-being of the population and reduce inequalities in	++	Will increase the provision of new health, well-being and community facilities. Site allocation would provide on-site provision of new services or facilities.
	health and well-being	+	Will potentially increase the provision of new health, well-being and community facilities. Site allocation has the potential to provide on-site provision of new services or facilities.
		0	No positive or negative effect on the objective.
		-	Potential loss of facilities and services.
			Will result in the loss of facilities and services.
		?	Uncertain effect on the objective
7	To improve accessibility to all health, educational, leisure and community services	++	Will increase accessibility to community facilities and services. Site allocation is within close distance of the majority of services and facilities.
		+	Has the potential to increase accessibility to community facilities and services. Site allocation is within close distance of the majority of services and facilities.
		0	No positive or negative effect on the objective.
		-	Limited potential to increase accessibility to community facilities and services. Site allocation is within an acceptable distance to only a few services and facilities.
			No potential to increase accessibility to community facilities and services. Site allocation is not within an acceptable distance to any services and facilities.
		?	Uncertain effect on the objective.
8	To improve the efficiency and safety of transport networks by enhancing the proportion of travel by sustainable	++	Will significantly improve travel choices and reduce the need and frequency to travel. Site allocation has a high level of multi-modal accessibility to a range of facilities

	SA Objective	Rating	Assessment Protocols for the Options
	modes and by promoting	+	Has the potential to improve travel choices and
	policies which reduce the		reduce the need and frequency to travel. Site
	need to travel and increase		allocation has a good level of multi-modal
	pedestrian safety on the		accessibility to a range of facilities
	roads	0	No positive or negative effect on the objective.
		-	Limited potential to improve travel choices and
			reduce the need and frequency to travel. Site
			allocation has a low level of multi-modal accessibility
			to a range of facilities
			No potential to improve travel choices and reduce
			the need and frequency to travel. Site allocation has
			poor multi-modal accessibility to a range of facilities.
		?	Uncertain effect on the objective
		++	The proposal or site allocation will make a significant
9.	To ensure that everyone has		contribution to providing existing and future residents
	the opportunity to live in a		with an opportunity to live in a decent home.
	good quality, affordable	+	The proposal or site allocation will contribute to
	home, suitable to their need		providing existing and future residents with an
	and which optimizes the		opportunity to live in a decent home.
	scope for environmental	0	No positive or negative effect on the objective.
	sustainability.	-	The proposal or site allocation will potentially reduce
			opportunities for existing and future residents to live
			in a decent home.
			The proposal or site allocation will significantly
			reduce opportunities for existing and future residents
			to live in a decent home.
		?	Uncertain effect on the objective
10	Ensure viability of the local	++	Proposal or site allocation will significantly assist the
	economy with improved		local economy.
	diversity of employment	+	Proposal or site allocation has the potential to assist
	opportunities and provision of		the economy.
	space for required	0	No positive or negative effect on the objective.
	employment growth	-	Proposal or site allocation has the potential to result
			in a negative impact on economy.
			Proposal or site allocation will have a significant
			negative impact on the economy
		?	Uncertain effect on the objective
11	To reduce levels of	++	Proposal or site allocation will significantly reduce
	deprivation within Petworth		deprivation levels within Petworth.
		+	Proposal or site allocation will reduce deprivation
			levels within Petworth.
		0	No positive or negative effect on the objective.
			Droposol or site allocation will warran deprivation
		-	Proposal or site allocation will worsen deprivation levels within Petworth.
			Proposal or site allocation will significantly worsen
			deprivation levels within Petworth.
		?	Uncertain effect on the objective
10	Minimino flood rick for new		Development in flood zone 4 and would reduce flood
12	Minimise flood risk for new	++	Development in flood zone 1 and would reduce flood risk within Petworth
	and existing development		

	SA Objective	Rating	Assessment Protocols for the Options
			Development in flood zone 1
		0	No positive or negative effect on the objective.
		-	Development in flood zone 2
			Development in flood zone 3a or 3b
		?	Uncertain effect on the objective
13.	3. To encourage the development of a buoyant, sustainable tourism sector	++	Proposal or site allocation will significantly improve Petworth's tourism economy.
		+	Proposal or site allocation has the potential to improve Petworth's tourism economy.
		0	No positive or negative effect on the objective.
		-	Proposal or site allocation has the potential to result in a negative impact on Petworth's tourism economy.
			Proposal or site allocation will result in significant negative impact on Petworth's tourism economy.
		?	Uncertain effect on the objective.

