

SUSTAINABILITY APPRAISAL

(Incorporating a Strategic Environmental Assessment)

SUBMISSION FITTLEWORTH NEIGHBOURHOOD PLAN

9/14/2018

Horsham District Council
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NON TECHNICAL SUMMARY

1. Introduction

- 1.1 This is the non-technical summary of the main Sustainability Appraisal (SA) for the Fittleworth Neighbourhood Plan. It gives a summary of the main findings of the SA which also incorporates the requirements of a Strategic Environmental Assessment (SEA). It has been prepared to set out the findings from the appraisal of the Pre Submission Draft of the Fittleworth Neighbourhood Plan which is being published for consultation under Regulation 14 of the Neighbourhood Planning Regulations 2012.
- 1.2 The SA also complies with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2014. These Regulations incorporate the information which is required in accordance with EU Directive 2001/42/EC on the Environmental Assessment of Plans and Programmes (the SEA Directive).
- 1.3 The main purpose of an SA is to ensure that, as far as possible, the most sustainable options have been chosen for the policies and allocated sites in the Neighbourhood Plan. The SA process, therefore, appraises the policies and allocated sites as well as reasonable alternatives against a Sustainability Appraisal Framework. This seeks to identify any potential significant negative effects of the plan. Such impacts can also arise where there is a combination of effects. Where negative effects are identified mitigation measures are suggested to reduce or negate the negative effects. The appraisal process should also identify positive effects and seek to enhance these where possible. The SA also includes indicators that could be used as to monitor any significant negative and positive effects of the plan.

2. Fittleworth Neighbourhood Plan

- 2.1 The Fittleworth Neighbourhood Plan (FNP) covers the whole parish of Fittleworth which is a rural area situated in West Sussex and within the South Downs National Park. Fittleworth village is the largest settlement in the parish and there are also the smaller settlements of Bedham, Little Bognor and Coates and isolated properties throughout.
- 2.2 The FNP sets out a vision and objectives to guide development between 2018 and 2033. Once the FNP is made it will form part of the development plan for the area and will be a material consideration when determining planning applications.
- 2.3 The Plan contains nine policies which address issues from design to surface water management. It also sets the strategic approach for housing development in the area. Policy FITT9 allocates two sites for housing which would provide 18 new homes and potentially 5 affordable homes. It also identifies one windfall site that has the potential to deliver four affordable homes. FNP also suggests where a new community shop could be located which would enhance the existing village centre.

- 2.4 One of the key objectives of the FNP is to deliver affordable housing. Evidence obtained when producing the FNP identifies a need for between 7 and 24 affordable homes in the parish. However, this needs to be balanced against the environmental constraints of the area. These are a high quality landscape and built environment, biodiversity and surface water flooding issues.

3. Outcome of the appraisal

- 3.1 The SA assessed each of the policies in the plan, the allocated sites as well as some alternative options to these. Overall the SA concluded that although the FNP seeks to allocate more houses than indicated in the plan that is being prepared for the South Downs National Park, this would not have a significantly harmful effect. The potential impacts are on the views at the entrance to the village, views from Fittleworth Common, flooding at one of the sites and impact on biodiversity. There are measures that can be taken to ensure that these effects would not be significant. The FNP would, therefore, deliver much needed affordable homes that would contribute to the vitality of the community of the parish without causing significant impacts on the high quality environment of the area.
- 3.2 The main alternative option to the policies in the FNP was considered in the SA. This was what the parish would be like in the future if the FNP was not in place. The main issue here is that without the plan less affordable housing would be built. In addition, the plan tries to ensure that these will be smaller homes for families or older people wishing to downsize. There are local issues, such as a new community shop, which are less likely to be addressed in other more strategic plans.
- 3.3 Finally the SA suggests some indicators that can be used to monitor the ongoing effects of the FNP. This will help to inform future versions of the FNP.

4. Outcome of the Pre-Submission Consultation

- 4.1 No comments were received in relation to the SA that accompanied the pre-submission FNP. The comments made directly on the FNP have resulted in some changes to the plan. None of these substantially altered the plan or are likely to give rise to significant environmental effects; hence no further appraisal of the plan was necessary. The mitigation measures suggested in this SA which were identified in the pre-submission FNP have been incorporated into the Submission FNP.

5. Conclusion

- 5.1 The FNP seeks to address the main social, economic and environmental issues that are facing the parish. The SA has shown that it will make a positive contribution to one of the most pressing issues; the lack of affordable housing, without having a significant impact on the high quality environment of the area.

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1. Introduction

Purpose of the report

- 1.1 This report forms the Sustainability Appraisal (SA) for the Fittleworth Neighbourhood Plan. It also incorporates the requirements of a Strategic Environmental Assessment (SEA). It has been prepared to set out the findings from the appraisal of the Pre Submission Draft of the Fittleworth Neighbourhood Plan which is being published for consultation under Regulation 14 of the Neighbourhood Planning Regulations 2012.
- 1.2 The report also complies with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2014. These Regulations incorporate the information which is required in accordance with EU Directive 2001/42/EC on the Environmental Assessment of Plans and Programmes (the SEA Directive).
- 1.3 The main purpose of an SA is to ensure that, as far as possible, the most sustainable options have been chosen for the policies and allocated sites in the Neighbourhood Plan. The SA process, therefore, appraises the policies and allocated sites as well as reasonable alternatives against a Sustainability Appraisal Framework. This identifies any potential significant negative effects of the plan. Such impacts can also arise where there is a combination of effects. Where negative effects are identified mitigation measures are suggested to reduce or negate the negative effects. The appraisal process should also identify positive effects and seek to enhance these where possible. The SA also suggests a monitoring regime for any significant negative and positive effects of the plan.

The Fittleworth Neighbourhood Plan

- 1.4 The area covered by the Fittleworth Neighbourhood Plan (FNP) is shown in Figure 1 and includes the whole of Fittleworth parish. The Fittleworth Neighbourhood Area was designated in March 2015 under the Neighbourhood Planning (General) Regulations Order Regulations 2012.
- 1.5 The FNP area is a rural with Fittleworth village being the largest settlement in the parish. This is situated in the southern part of the parish. The area also includes the smaller settlements of Bedham, Little Bognor and Coates with isolated properties throughout. The parish lies in West Sussex between the larger settlements of Petworth to the west and Pulborough to the east. The whole Neighbourhood Plan area is within the South Downs National Park.
- 1.6 Once the FNP is made it will form part of the development plan for the area and must be taken into account when determining planning applications. The South Downs Local Plan has not yet been adopted, however, once it is, it will contain the strategic policies which sit above the FNP. The Local Plan policies that were included in the Scoping Report were taken from the Preferred Options stage (dated September 2015). The current plan is the South Downs Submission Local Plan. The changes to the policies that effect Fittleworth parish are not significant enough to require an update to the baseline information. The Local Plan for the South Downs should be adopted in 2019. In the meantime the development plan for Fittleworth parish is the Chichester District Local Plan 1999.



Figure 1 – Map of the Fittleworth Neighbourhood Plan area

- 1.7 The Fittleworth NDP establishes a vision for the long term sustainability of the village over the next 15 years, from 2018 to 2033. The Vision and Objectives in the Pre Submission Plan are as follows:-

VISION

Fittleworth aspires to be a village which by 2032 will have accommodated some new development to meet the needs of its community but retained its special character as an historic but viable village set within a beautiful landscape which is rich in biodiversity and cultural heritage, It will have responded to the identified need for additional affordable housing to attract and retain a younger generation, while requiring such housing to respect existing development , to lie within the settlement area and within the guidelines laid down by the South Downs National Park.

Objective 1:

To conserve and enhance the local environment, taking opportunities to enhance the local landscape, ecology and heritage and incorporate measures to reduce the risk of flooding, or other damage to the environment.

Objective 2:

To secure development that enhances the design, character and appearance and landscape setting of the village; reflects the existing density, scale and use of local materials and incorporates appropriate renewable and low carbon technology.

Objective 3:

To support existing and new community facilities to meet the needs of the parish including the provision of a local shop, and to protect existing sites currently providing local employment

Objective 4:

To improve opportunities for young families with limited financial resources and in housing need, to live in the village by encouraging and supporting the provision of affordable/low cost housing, with preference given to those with local connections.

- 1.8 The plan has been developed by a Steering Group which has representatives of the Parish Council and the local community. Various documents have been used as the evidence base for producing the plan; including a Rural Housing Survey Report¹. Consultation with the local community has taken place throughout the development of the plan. This included an exhibition and questionnaire on the potential sites to be allocated in the plan. All of the sites have been analysed in a Site Assessment Report² which can be viewed <https://fittleworth-pc.org.uk/neighbourhood-development-plan/>.

2. The SA/SEA process

- 2.1 This section of report explains why an SA/SEA is required and gives an overview of what the appraisal process should include. It also explains the requirements of the EU Directive on SEA and where these are included in this report.

The need for an SA/SEA

- 2.2 An SEA is not required for all Neighbourhood Plans. The process is required where such a plan allocates land for development and has the potential to have a significant impact on the environment or where the neighbourhood plan area contains sensitive natural or heritage assets. The requirement to carry out an SEA is determined through a Screening Opinion.

¹ Rural Housing Survey Report – Fittleworth Parish. Housing Delivery Team, Chichester District Council (August 2015)

² Site Assessment Report for Fittleworth Neighbourhood Development Plan February 2017

- 2.3 The South Downs National Park Authority (SDNPA) carried out a Screening Opinion for the early stages of the development of the FNP. It confirmed the need for a SEA because of the following:-
- The Plan has the potential to allocate up to 20 dwellings. Only 6 dwellings were assessed through the Sustainability Appraisal for the emerging South Downs Local Plan;
 - These allocations are likely to be focused in Fittleworth village which has a rich historic environment; namely a Conservation Area, numerous Listed Buildings and Scheduled Ancient Monuments;
 - The area also has a rich natural environment with designated biodiversity sites (Sites of Special Scientific Interest) close to the village and the Mens Special Area of Conservation nearby. The latter is of international significance and means that any proposed development in the area needs to be considered against the Habitats Directive³;
 - Other relevant issues to be considered are the flood risk associated with the River Rother and the impact of any proposed development on landscape character.
- 2.4 Having established that an SEA was required the decision was taken to produce a joint SEA/SA. The latter extends the requirements of the SEA to incorporate social and economic issues. Whilst there is no legal requirement for a Neighbourhood Plan to have a SA, such plans must be “based upon and reflect the presumption in favour of sustainable development”⁴. A formal appraisal which assesses the plan against relevant sustainability issues provides a structured way of demonstrating this. A SEA/SA provides a systematic way of assessing the environmental, social and economic effects of a plan. The aim is to offset or reduce any potential negative effects and enhance positive effects on the environment and socio-economic issues and thereby strengthen the plan.

Stages in the SEA/SA

- 2.5 One of the basic conditions that the Examiner will address is whether the plan adheres to the requirements of relevant European legislation. The SA (incorporating the Environment Report) must adhere to the requirements of EU Directive 2001/42 on strategic environmental assessment. The requirements for the content of an SEA are given in Annex II to the Directive. These are repeated in Table 1 together with an overview of how these requirements have been incorporated into this SA and the accompanying Scoping Report.
- 2.6 The requirements of the SEA occur at different stages of the appraisal process but should be an integral part of developing the Neighbourhood Plan. It is an iterative process, as the findings of the SA/SEA should influence the development of the plan.

³ Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. The Habitats Directive is primarily transposed in England under the Conservation of Habitats and Species Regulations 2010

⁴ National Planning Policy Framework (DCLG March 2012 para 15)

Requirement of the SEA Directive (Annex II)	Sustainability Appraisal
An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes	Updated Scoping Report and section 1 of the SA
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Updated Scoping Report and section 5 and 6 of the SA
The environmental characteristics of areas likely to be significantly affected	Section 6 of the SA
Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance	Updated Scoping Report and section 3 and 5 of the SA
The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation	Updated Scoping Report
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	Section 6 of the SA
The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan	Section 6 and 7 of the SA
An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 6 of the SA
A description of measures envisaged concerning monitoring	Section 5 and 7 of the SA

Table 1 – Requirements of the EU Directive and their inclusion in the SA

3. The Scoping Report

- 3.1 Once the need for an SA/SEA has been determined a scoping process is undertaken. This determines the scope and level of detail for carrying out the SA/SEA by identifying the key environmental and socio-economic issues that are relevant to the area. There are two areas of work that are completed; collating relevant data and sources of information and identifying plans and policies that influence these issues in the plan area. The latter also assists with ensuring that the plan complies with national policy (particularly the National Planning Policy Framework) and higher level plans.
- 3.2 The outcomes of the scoping process are presented in a Scoping Report. The original and updated Scoping Report for the Fittleworth Neighbourhood Plan can be found <https://fittleworth-pc.org.uk/neighbourhood-development-plan/>. This presents information on the following tasks:-
- Collecting the baseline information on environmental, social and economic issues
 - Identifying relevant policies, plans and programmes
 - Identifying sustainability strengths, weaknesses, opportunities and threats,

- Developing the SA Framework.

- 3.3 The SA Framework is based on the first three elements listed above and contains the objectives that were used to appraise the plan. It also contains suggested indicators that could be used to monitor the plan for its potential significant effects.
- 3.4 The Scoping Report was published for consultation for 5 weeks between Monday 15th August and Monday 19th September 2016. This provided the statutory consultees with the opportunity to ensure that the main sustainability issues had been identified and that the proposed assessment methodology was acceptable. The responses that were received are shown in Appendix 1. This contains a summary of the comments and a response to the suggested changes together with an indication of the modifications that have been made. These updates are included in this SA and in some cases this has resulted in amendments to the baseline information in an updated Scoping Report. The maps of the main environmental assets for the parish form Appendix 2 to the SA.

Pre-submission FNP – outcome of the consultation

- 3.5 No comments were received in relation to the SA report that accompanied the pre-submission FNP. The comments made directly on the FNP have resulted in some changes to the plan. None of these substantially altered the plan or are likely to give rise to significant environmental effects; hence no further appraisal of the plan was necessary. The mitigation measures suggested in this SA which were identified in the pre-submission FNP have been incorporated into the Submission FNP.

4. Habitats Regulation Assessment

- 4.1 The SDNPA commissioned a consultant to carry out a Habitats Regulation Assessment (HRA) due to the presence of The Mens within and beyond the northern part of the parish. This is a Special Area of Conservation (SAC) under the Habitats Directive⁵ and a Site of Special Scientific Interest. The Mens supports one of the largest areas of acidophilus beech forests in the south east of England and in turn supports lichens, bryophytes, fungi and dead wood invertebrates. The site is also designated because of the presence of Barbastelle bats.
- 4.2 The area covered by the FNP is within zones identified in the draft 'Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol' (Natural England and SDNPA, 2017) for the Ebernoe Common SAC.. This is designated due its maternity colonies of Barbastelle bats and Bechstein bats. These bats can forage up to several kilometres from their roost sites and, therefore, the impact of the FNP on this site needs to be considered in the HRA.
- 4.3 Plans and projects can only be permitted where it can be demonstrated that there is no adverse effect on the integrity of a site designated under the Habitats Directive. An HRA must be carried out to determine if the integrity of the site is likely to be affected by

⁵ The European Commission Habitats Directive 1992 aims to "maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community Interest". It is transposed into UK law in the Conservation of Habitats and Species Regulations 2010

proposals in the plan. In the case of the FNP this includes the allocation of 3 sites for housing and a site for a new community shop. Such developments can have an impact on the bat species that are present in the two SAC's through disturbance during construction and once the developments are completed; due to lighting impacting on their flight lines or foraging areas.

- 4.4 The HRA concluded that *“Policies within the Neighbourhood Plan protect bats by ensuring their commuting and foraging routes remain intact and with limited lighting impact. With these recommendations [as set out in Section 7 of the HRA Report] incorporated, the Neighbourhood Plan would have a sufficient policy framework in place to ensure that it would not result in adverse effects, alone or ‘in combination’ with other plans and projects.’* The HRA can be viewed at <https://fittleworth-pc.org.uk/neighbourhood-development-plan/>.

- 4.5 The findings of the HRA are linked to the SA as the former has concluded that the NDP would not result in adverse effects, alone or in combination, on the relevant internationally designated ecological assets. The HRA recommended particular policy wording to avoid and/or mitigate for any impacts and these recommendations are set out later in this SA against the relevant policies and site allocations.

5 Key Sustainability Issues for the Plan Area

- 5.1 The baseline information in the Scoping Report and advice from the SDNPA and the Fittleworth Neighbourhood Plan Steering Group have been used to draw out the key sustainability issues that are relevant for this parish. These are shown in Table 2 and are presented as strengths, weaknesses, opportunities and challenges. These present opportunities to achieve sustainability gains for the parish through the development of the Neighbourhood Plan.

Strengths

- A strong sense of community with a reasonable number of community facilities in comparison to the size of the village and several active community groups
- A village that has maintained its rural nature and its distinctive character, with much of the parish being very tranquil
- A high quality built environment with many heritage assets that are protected through national designations
- A rich ecology that adds to the rural character of the area and the high quality of the landscape
- An excellent network of local footpaths and bridleways provides access to the open countryside, as well as common land and heath land within Fittleworth
- A high percentage of the population is skilled and many have home based employment

Weaknesses

- Population is not demographically balanced with a larger percentage of the population aged over 65
- A lack of smaller (1 and 2 bedroomed) affordable properties to allow young people to move into the area and for older residents to downsize
- A lack of mixed tenure with most properties being owner occupied and expensive compared to local average salaries

<ul style="list-style-type: none"> • Over reliance on non-sustainable forms of transport and limited public transport serving the village • Issues of highway safety from speeding, and sometimes heavy traffic, on the A283 and B2138 through Fittleworth and Heavy Goods Vehicles using the B2138 • Limited employment and services, such as medical facilities, within the parish combined with limited public transport is an issue for those without access to a car
Opportunities <ul style="list-style-type: none"> • Additional housing identified through the Neighbourhood Plan could address the pressing need for smaller affordable homes with a mix of tenures • Additional allocations for housing could stem the decline in population that supports local community facilities e.g. the primary school, as well as creating a more demographically balanced community • Appropriate scale development could provide opportunities to enhance the local landscape/townscape and ecology • Appropriate policies in the Neighbourhood Plan would ensure that new development reflects the existing density and scale of the area and the use of sympathetic materials • New development schemes could incorporate appropriate renewable and low carbon technology as well as measures that increase water efficiency and reduce the risk of flooding
Challenges <ul style="list-style-type: none"> • Potential for the age profile of the area to continue to be dominated by older retired residents • Lack of local employment opportunities means most residents commute and the lack of regular public transport means that this is mostly by car • The high quality landscape and number of built heritage designations need to be protected, which could limit the number of houses that can be built in the area for local residents • Parts of the area regularly experiences fluvial flooding (adjacent to the River Rother) as well as surface water flooding • Changes to the climate could increase pluvial and fluvial flooding and have a negative impact on the landscape and ecology

Table 2 – Strength, weaknesses, opportunities and challenges for Fittleworth parish

The Sustainability Appraisal Framework

- 5.2 The SA Framework is used to ensure that all relevant environmental and socio-economic effects from developing the plan are identified. Another important aspect of the appraisal is to ensure that all reasonable alternative options for policy development or site selection have been considered. The appraisal assists in demonstrating that the most sustainable options have been included in the plan.
- 5.3 The Framework consists of a number of objectives that reflect the three pillars of sustainable development – environmental, social and economic. They flow from the key sustainability issues for the parish and, therefore, ultimately from the baseline information and plans, policies and programmes. The assessment includes the questions that will be used to consider each objective. This will ensure that a consistent approach is taken. The appraisal process was undertaken using the criteria included in the SA Framework in Table 3.
- 5.4 Once adopted the Neighbourhood Plan will be monitored and part of this monitoring will be the ongoing sustainability impact of the plan. The indicators listed in Table 3 could be used to carry out ongoing monitoring of the plan. Only the significant effects (both positive and

negative) will be monitored so not all of the suggested indicators are likely to be required. Some will be monitored by the SDNPA and others by Fittleworth Parish Council.

Sustainability Theme	Objective	Assessment criteria	Potential Indicator
Landscape (Environment)	Conserve and enhance the landscape character of the parish	<p>Will the plan ensure that development schemes have a minimal impact on key landscape features; such as being sited appropriately and being small in scale to reflect the Scarp Slope and views into Fittleworth?</p> <p>Will the plan ensure that developments enhance the local landscape?</p> <p>Will the plan control lighting to retain and enhance the Dark Skies designation of the South Downs?</p>	<p>Number of applications with landscape enhancement conditions (Source: Fittleworth Parish Council)</p> <p>Number of applications that incorporate the recommendations from the Landscape Officer at the South Downs National Park (Source: Fittleworth Parish Council)</p> <p>Dark night status is maintained and enhanced (Source: SDNPA Authority Monitoring Report (AMR))</p>
Biodiversity (Environment)	Protect sites designated for their ecological and geological value and conserve and enhance the biodiversity of the parish	<p>Will the plan protect and enhance existing flora, fauna and habitats; such as heathland, floodplain with marshy grassland, woodland (semi-natural broadleaf, mixed and ancient)</p> <p>Will the plan ensure that designated sites are protected?</p> <p>Will the plan retain and enhance habitat networks and wildlife corridors (ancient woodland and riverine habitats)?</p>	<p>Condition of designated ecological sites (Source: SDNPA Authority Monitoring Report (AMR))</p> <p>Number of applications which include schemes to improve local biodiversity (Source: SDNPA via Community Infrastructure Levy (CIL))</p> <p>Loss of ancient woodland and riverine habitats (Source: SDNPA AMR)</p>
Built Environment and heritage assets (Environment)	<p>Conserve and enhance the historic environment, heritage assets and their settings, as well as preserving the existing townscape</p> <p>Encourage renewable and low carbon forms of energy</p>	<p>Will the plan ensure that heritage assets and their settings are protected and enhanced?</p> <p>Will the plan ensure that the design of new development does not detract from the local townscape, through the use of mixed local materials and appropriately scaled developments?</p> <p>Will the plan encourage the installation of appropriate forms of renewable/low carbon energy?</p>	<p>Number of applications that incorporate heritage enhancement or improvement schemes (Source: SDNPA via Community Infrastructure Levy (CIL))</p> <p>Number of historic features lost through new development schemes (Source: Fittleworth Parish Council)</p> <p>Number of applications that incorporate renewable/low carbon technology (Source: Fittleworth Parish Council)</p>

	appropriate to their setting		
Housing (social)	Provide homes that are suitable for all sections of the community, including affordable homes	Will the plan increase the number of affordable homes and provide smaller housing units with mixed tenures?	<p>Number of new homes built during the life of the plan (Source: SDNPA)</p> <p>Number of new 1,2,3 and 4 bed houses constructed and as a proportion to the total completed on an annual basis (Source: SDNPA)</p>
Water (Environment)	Minimise the risk of flooding, use water efficiently and protect water quality	<p>Does the plan restrict development in the Flood Risk Zone?</p> <p>Does the plan encourage development to incorporate measures that reduce pluvial flooding?</p> <p>Will the plan encourage developments that use water efficiently?</p> <p>Will the plan ensure that development does not affect ground water supplies?</p>	<p>% of residential applications approved in Flood Risk Zone 3 (Source: SDNPA AMR)</p> <p>Number of developments that incorporate Sustainable Urban Drainage Systems (Source: Fittleworth Parish Council)</p> <p>Number of developments that incorporate measures to improve water efficiency (Source: Fittleworth Parish Council)</p>
Sustainable Transport (Environment and social)	Reduce the need to travel and increase the proportion of travel by sustainable modes	Does the plan ensure that residents can use sustainable forms of transport?	% of residents using sustainable forms of transport to travel to work e.g. public transport, cycling and walking (Source : Census)
Vital Community (Social)	Create and sustain a safe, healthy and vibrant community	<p>Will the plan encourage a community that has a well-balanced demographic?</p> <p>Will the plan seek to improve the standard of public open spaces and leisure, recreation and community facilities in Fittleworth?</p> <p>Will the plan seek to reduce the amount and speed of traffic on the main highways in the area?</p>	<p>Population age structure (% in different age groups) (Source : Census)</p> <p>Number of contributions from the Community Infrastructure Levy for enhancements to leisure, recreation or community facilities? (Source: SDNPA Annual Monitoring Report AMR)</p> <p>Number of contributions from the Community Infrastructure Levy for highway safety improvements (Source: SDNPA via Community Infrastructure Levy (CIL))</p>
Rural economy (Economy)	Encourage access to local employment, skills and training	<p>Will the plan encourage residential developments that allow home working?</p> <p>Will the plan support the provision of a new village shop?</p>	Number of residential applications with space for home working (Source: Fittleworth Parish Council)

Table 3 – The Sustainability Appraisal Framework

6 Appraisal of the Plan and Alternative Options

Compatibility of the FNP Objectives against the SA Framework

- 6.1 This is the main part of the SA where the policies and site allocations are appraised against the Sustainability Assessment Framework. However, the appraisal process starts by assessing the objectives in the plan with the SA Framework to identify how compatible the two are and if there are any areas of conflict. Figure 2 presents the outcome of the compatibility appraisal.

Sustainability Appraisal Framework Objectives	Landscape	Biodiversity	Built environment & heritage assets	Housing	Water	Sustainable transport	Vital community	Rural Economy
Neighbourhood Plan Objectives								
1. Local environment	✓	✓	✓	?	✓	✓	✓	?
2. Design of development	✓	✓	✓	?	✓	✓	?	✓
3. Community facilities	?	?	?	✓	✓	✓	✓	✓
4. Affordable housing	?	?	?	✓	✓	✓	✓	✓

Compatible	✓
Potentially incompatible	?
Incompatible	x

Figure 2 – Compatibility between the FNP objectives and the SA Framework

- 6.2 The two sets of objectives are mostly compatible meaning that the FNP objectives reflect the broad range of environmental, social and economic issues that would contribute to the sustainability of the area. However, there are some instances where there is potential for the objectives to be incompatible. These mostly related to where the high quality environmental and built environment could be effected by the provision of community facilities and housing. In turn these constraints could restrict opportunities to provide these forms of development. Given the setting of the parish within a national park, the presence of three Conservation Areas and a site with a European designation for its ecological value the plan appears to strike the right strategic balance between the need to protect and enhance the high quality environment and the need to retain the vitality of the local community. The detail in the policies will be crucial in ensuring that the socio-economic aspects of the plan can be delivered.
- 6.3 In order to carry out the appraisal of the sites, policies and alternatives the following “scoring” was used. This approach allows an overview to be given of the positive and

negative effects of the policies and site allocations. This approach has also been used to appraise the reasonable alternatives for the strategic approaches in the plan as well as the proposed site allocations and policies and sites.

Strongly positive	Positive	Neutral	Negative	Strongly negative	Unknown
++	+	-	x	xx	?

Figure 3 – scoring used for the appraisal process

Appraisal of the strategic aspects of the plan – spatial strategy

- 6.4 The strategy for allocating sites for housing is set out in Policy FITT8 – new housing development. It establishes the criteria for new housing in the plan area. Its starting point is that development should principally be within the settlement boundary of Fittleworth. Outside of this boundary development will only be permitted if it necessary for the purpose of agriculture, horticulture, forestry and other uses that requires a rural location. However, the FNP allocates two sites outside but adjacent to the settlement boundary, therefore, requiring the boundary to be amended.
- 6.5 It would not be reasonable to appraise an option that is more permissive to developing land away from the settlement boundary as this would not be compatible with the strategic approach in higher level plans and policies. Indeed, development in national parks is very strictly controlled through the National Planning Policy Framework and the emerging South Downs Local Plan. A reasonable alternative is therefore, an option that does not amend the settlement boundary and only allows sites to be allocated within the existing boundary.
- 6.6 The following, therefore, appraises two options:-
- Option A; policy FITT8 and alternations to the settlement boundary
 - Option B; policy FITT8 with no alterations to the settlement boundary.

SA Framework Objectives	Landscape	Biodiversity	Built environment & heritage assets	Housing	Water	Sustainable transport	Vital community	Rural economy
Strategic options								
Option A	x	-	-	++	x	+	+	+
Option B	-	-	x	+	-	+	-	-

Figure 4 – Appraisal of the spatial strategy

- 6.7 The most significant difference with the two options is the amount of affordable housing that could be delivered. The delivery of affordable homes is an objective of the plan. Option

A has the potential to deliver 5 affordable homes. Four of these homes could be delivered on CH033 (this is based on 40% of the total homes on this site). In addition, site CH032 could deliver 1 affordable home (based on 20% of the total homes being affordable on a site of between 5-9 dwellings)⁶. In addition to these allocated sites there is a windfall site (CH031) which could provide 4 affordable. This land is owned by a Housing Association and it is anticipated that the whole development would consist of affordable homes.

- 6.8 The Rural Housing Survey Report suggests that between 7 and 31 residential units are required in the parish and that between 7 and 24 of these should be affordable homes, whilst 0 – 5 of this figure should be market housing. This demonstrates that there is a clear need for affordable homes to be provided in the plan.
- 6.9 Option B would not allocate any sites and only one site (CH031) may come forward as a windfall site which could provide 4 affordable homes. In addition, it is not currently certain that the site would be delivered in the lifetime of the plan.
- 6.10 As Option A delivers more housing and specifically affordable homes, this would make a greater contribution to the vitality of the village and has the potential to support the local rural economy.
- 6.11 Both options have the potential to impact on biodiversity due to The Mens SAC which is located within the northern part of the parish. However, the HRA has suggested that the potential effects can be mitigated through changes to the plan and for additions to Policy FITT9 which allocates sites for housing. An Ecological Assessment would also be required given the potential presence of priority species.
- 6.12 Both options contain sites that are accessible to the village centre and its facilities as well as access to public transport. All of the sites are within 1km (15 minute walk) of the village centre.
- 6.13 Option A has the potential to negatively affect the water objective as site CH033 has issues with flooding and a pond within the site. It could affect landscape due the location of one site at the entrance to the village and the other could affect views from Fittleworth Common. Both of these affects can be mitigated. Neither of these affects would occur with Option B. However, it does have the potential to impact on a listed building which is situated 78m from site CH031 and is also adjacent to the Conservation Area.
- 6.14 Overall option B is likely to have less negative affects but conversely it would make less contribution to the objective of providing affordable homes. The potential negative effects from Option A can be mitigated; as explained in more detail in Table 4. Therefore, on balance Option A is more sustainable than Option B.

Appraisal of the strategic aspects of the plan – housing numbers

- 6.15 The SDNPA Local Plan – Preferred Options indicates that Fittleworth can deliver 6 dwellings. It is therefore, reasonable to assess this figure with the 18 houses that are allocated in the

⁶ These are the requirements of the Interim Statement – Planning for Affordable Housing (28 September 2007) Chichester District Council

Pre Submission draft of the FNP (4 affordable homes would also be delivered on a windfall site).

SA Framework Objectives	Landscape	Biodiversity	Built environment & heritage assets	Housing	Water	Sustainable transport	Vital community	Rural economy
Allocate 18 dwellings	X	X	-	++	X	+	+	+
Allocate 6 dwellings (CH032)	X	X	-	+	-	+	-	-

Figure 5 – Appraisal of the different housing numbers

- 6.16 This appraisal gives similar results to that for the alternative spatial strategy. Site CH032 could deliver 6 houses without the need to allocate the other site in the plan and the windfall site. However, only allocating CH032 would only deliver one affordable home which is an important objective of the plan. The delivery of this one home on site is not certain and this allocation may only deliver a financial contribution for off-site delivery. Providing affordable homes also has the benefit of supporting a vital community and potentially the rural economy which would not be realised with the option of only allocating 6 homes.
- 6.17 The potential negative impacts from allocating 18 homes are on landscape and biodiversity with potential to increase surface water flooding. It is possible to mitigate these affects. These are set out in Table 4 and paragraph 6.24 to 6.26 of the report which appraises each of the allocated sites in detail.
- 6.18 Overall the approach in the plan to allocate two sites for 18 houses could deliver 5 affordable homes contributing to one of the objectives of the plan. This would also realise additional social and economic benefits. This approach would have some environmental effects but these can be mitigated (as explained in Table 4). The option of allocating six houses gives the potential of providing one affordable home. The site would have fewer environmental effects but is less sustainable as it would not deliver the same level of social and economic benefits.

Appraisal of the allocated sites

- 6.19 A total of eight sites were considered for allocation in the plan. These were a mixture of sites within the SDNPA Strategic Housing Land Availability Assessment⁷ and sites submitted to the Steering Group. The detail for each of these is considered in the Site Assessment Report for Fittleworth Neighbourhood Development Plan which can be seen at <https://fittleworth-pc.org.uk/neighbourhood-development-plan/>. This used a range of sustainability criteria to

⁷ Strategic Housing Land Availability Assessment. South Downs National Park Authority (December 2016)

systematically assess the sites. This gives a strong link between the site assessment process and the SA.

- 6.20 Two sites were screened out at an early stage of the site assessment process as they were remote from a settlement boundary and did not, therefore, accord with the strategic approach in the Neighbourhood Plan or higher level plans.
- 6.21 A further site (The Old Coal Yard, School Close) has consent for 9 dwellings so the principle of this development has already been established. The number of homes provided on this site can be counted towards the FNP total allocation. Given the size of the site it may deliver one affordable home or a financial contribution for offsite delivery.
- 6.22 This left six sites nearer to the built up area boundary with potential to be allocated. One of these sites, The Triangle by Church Lane (CH030), has significant constraints in terms of availability and impact on landscape, biodiversity and heritage.
- 6.23 Of the five remaining sites two are allocated in the plan and one is a windfall site (CH031). Policy FITT9 contains criteria relating to these three sites. The appraisal of these is set out in figure 5. The assessment of the land north of the A283/Sorrels Farm to junction of School Lane (CH034) for both housing and a recreational site is appraised as alternative in figure 6 and is not, therefore, appraised in this part of the SA.

SA Framework Objectives	Landscape	Biodiversity	Built Environment & Heritage Assets	Housing	Water	Sustainable Transport	Vital Community	Rural Economy
Sites								
CH031	-	X	X	+	-	+	+	-
CH032	X	X	-	+	-	+	+	-
CH033	X	X	-	++	X	+	++	+

Figure 6 – Appraisal of the allocated housing sites

- 6.24 All of the sites score well in terms of the social criteria in the appraisal as they can provide housing which will help to sustain the vitality of the village (such use pupils at the primary school) and all are within a 15 minute walk (or 1km) of bus stops and the village centre. Only CH033 can deliver affordable housing on site and is therefore, strongly positive and is more likely to sustain the local economy given the number of dwellings and mixture of tenures.
- 6.25 It should be noted that all of the sites score negatively in terms of potential effect on biodiversity. This is because of the presence of SAC's at The Mens and Ebernoe Common. In addition, priority species have been recorded near CH031 and CH033 in the past. The HRA

has addressed the potential impact on the SAC's by providing a series of recommended amendments to avoid and/or mitigate to ensure no adverse indirect effects. Due to the presence of priority species an Ecological Assessment should be carried out at these sites to confirm if any priority species are present and suggest appropriate mitigation measures.

- 6.26 All of the mitigation measures for the sites are listed in Table 4. In turn Policy FITT9 a, b and c should be amended to include relevant recommended criteria that would mitigate potential impacts from the three development sites. It should be noted that the suggested changes have been included in the Submission FNP.

Site	Potential impact	Mitigation
CH031 (windfall site)	Listed Building is situated beyond a significant tree line along the western boundary of the site. It also abuts the Conservation Area for Fittleworth village. Any proposal would need to ensure that the trees are retained and the height and design of the development would need to ensure that there is no impact on the adjoining Conservation Area	Add criteria to policy to ensure that if this site is developed there is no substantial harm to the adjoining Conservation Area and Listed Building
	Potential impact on The Mens SAC and Ebernoe Common SAC	Appropriate design and mitigation should be put in place with regard to impacts on bats, including retaining key features used by bats and limiting light spill to no greater than 0.5 lux onto key features within or outside of the boundaries of the development site
	Potential presence of priority species	An Ecological Assessment should be carried out to establish if any priority species are present and to identify relevant mitigation measures that may be required
CH032	Potential impact on views from Fittleworth Common	Ensure that the development is small scale and situated along the road frontage
	Potential impact on The Mens SAC and Ebernoe Common SAC	Appropriate design and mitigation should be put in place with regard to impacts on bats, including retaining key features used by bats and limiting light spill to no greater than 0.5 lux onto key features within or outside of the boundaries of the development site
CH033	In a prominent location at the entrance to the village with trees along the site boundary	Retain existing trees with amenity value and provide additional planting to ensure that there is not a hard urban edge to this part of the street scene
	Site experiences waterlogging but is within Flood Zone 1	Ensure that a Flood Risk Assessment and Strategy is produced to address the current waterlogging issues and that surface water flooding is not increased
	Speeding traffic on the A283 could cause issues accessing the site	Install traffic calming measures on the A283 or extend the 30mph speed limit to include the entrance to the development. Access should be provided either from Limbourne Lane or the A283

	Potential impact on The Mens SAC and Ebernoe Common SAC	Appropriate design and mitigation should be put in place with regard to impacts on bats, including retaining key features used by bats and limiting light spill to no greater than 0.5 lux onto key features within or outside of the boundaries of the development site
	Potential presence of priority species	An Ecological Assessment should be carried out to establish if any priority species are present and to identify relevant mitigation measures that may be required

Table 4 - Mitigation measures for site allocation policy (FITT 9)

Appraisal of the alternative housing site allocations

- 6.27 The Site Assessment Report includes an assessment of all of the sites that were put forward for allocation in the FNP or were identified in the Strategic Housing Land Availability Assessment (SHLAA)⁸. A range of issues were used in the Assessment to determine the opportunities and constraints for each of the 5 sites. In terms of the SA it is not reasonable to appraise sites that are not near the settlement boundary as this would not comply with policies in higher level plans. However, as one of the objectives of the plan is to allocate land for affordable housing it is reasonable to consider other options for achieving this.
- 6.28 The current plan allocates three sites but only one of these can provide affordable housing as part of the development; namely land at the corner of Limbourne Lane/The Fleet (CH033). An alternative would be to allocate land north of A283/Sorrels Farm to the junction of School Lane (CH034 (a)) as this is a larger site (4.5ha) with the potential to provide more affordable homes than CH033. The latter site is 0.9ha.

SA Framework Objectives	Landscape	Biodiversity	Built environment & heritage assets	Housing	Water	Sustainable transport	Vital community	Rural economy
Sites								
CH033	X	X	-	++ ⁹	X	+	+	+
CH034 (a)	XX	XX	XX	++	-	+	+	+
CH034 (b)	X	X	X	++	X	+	-	+

Figure 7 – Appraisal of the alternative housing site allocations

⁸ Strategic Housing Land Availability Assessment. South Downs National Park Authority (December 2016)

⁹ This is a lower score than in figure 5 as the site would deliver fewer affordable homes than CH034 (a)

- 6.29 CH034 (b) is another alternative option to CH033 where the land at the junction of A283/Sorrels Farm to the junction of School Lane is used for recreation and this facility in the centre of the village is redeveloped for housing. This site is also larger than CH033 (1.2ha). Both CH034 (a) and CH034 (b) have the potential to provide more affordable houses and would, therefore, be positive in terms of the objectives for housing, vital communities and rural economy. This would make a significant contribution to one of the objectives in the plan and also the figure suggested in the Rural Housing Survey Report for the number of affordable homes required in the parish.¹⁰
- 6.30 Site CH033 has potential negative effects on flooding as it experiences waterlogging; however, it is within Flood Zone 1. There could also be an impact on the landscape impact as this site provides an attractive entrance to the village. However, site CH034 (a) has the potential to cause significant environmental harm to the landscape, biodiversity and heritage assets. Although both sites could affect biodiversity due to the proximity to The Mens, a larger site brings the potential for an increased negative impact. Overall the environmental constraints of CH034 (a) do not outweigh the objective of providing affordable homes in the parish and, therefore, replacing site CH033 with CH034 (a) in the plan are less sustainable options. Furthermore, mitigation measures can be put on place for site CH033 to reduce the potential negative effects of housing on this site.
- 6.31 In terms of CH034 (b) the most significant detrimental effect would be moving the recreation ground away from the village centre and therefore, disrupting the current village hub. There are potential issues with flooding on the recreation ground site and the replacement recreation ground could have landscape impacts. Again the potential to provide more affordable housing does not outweigh the negative effects of moving the recreation ground to site CH034 and developing the former for housing.

Appraisal of the policies

- 6.32 Each of the policies in the plan has been appraised against each of the objectives in the SA Framework. This allows the strengths and weaknesses of policies and subsequent mitigation measures to be identified. Policies FITT8 and FITT 9 relate to new housing development and the allocated sites, respectively. These have, therefore, been assessed in the previous two sections of the SA.

Landscape objective

- 6.33 The landscape policy unsurprisingly would make a strong positive contribution to this objective. It also makes reference to dark skies and the tranquillity of the area which both contribute to landscape character. The plan could be strengthened by indicating what measures could be taken to conserving and enhancing dark skies and tranquillity. Although this would duplicate the SDNP Local Plan it could add any local factors, such as indicating which areas of the parish are the most tranquil and dark and therefore, sensitive to change.

¹⁰ The Rural Housing Survey Report (August 2015) Chichester District Council stated that between 7 and 24 affordable homes are required in Fittleworth parish

6.34 Several of the policies (FITT2, FITT4 and FITT5) would make a positive contribution to the landscape character of the area. These do not directly mention landscape character, however, in seeking to conserve and enhance local biodiversity, heritage assets and built environment this would make a positive contribution to the landscape character of the area.

6.35 None of the policies would have a negative effect on this objective.

Policies	Landscape FITT1	Biodiversity FITT2	Water Environment FITT3	Built Heritage FITT4	Design FITT5	Community Shop FITT6	Extensions FITT7
Appraisal	++	+	-	+	+	-	-

Biodiversity objective

6.36 Overall the policies in the plan would make a positive contribution to this objective. None would have a negative effect. The biodiversity policy would have the strongest positive effect. The policy could be strengthened by stating the any existing habitat networks and wildlife corridors should be protected and enhanced. Natural England has stated that this is an important feature of the parish.

6.37 The policy relating to landscape (FITT2) is likely to have an indirect positive effect as landscape protection is also likely to protect biodiversity as many of the habitats and species are located outside the settlement of Fittleworth. The policy on the water environment (FITT3) directly refers to improving the biodiversity of the River Rother. Whilst policy FITT4 on design (FITT4) seeks to ensure that new development contributes to the high quality natural environment which includes biodiversity.

Policies	Landscape FITT1	Biodiversity FITT2	Water Environment FITT3	Built Heritage FITT4	Design FITT5	Community Shop FITT6	Extensions FITT7
Appraisal	+	++	+	-	+	-	-

Built Environment and heritage assets objective

6.38 Although several of the policies would have a positive effect on this objective there are several areas where additions to the plan would ensure that this positive effect is enhanced.

6.39 The landscape policy could have a positive effect on this objective. There is a direct link between retaining the landscape character of an area and retaining the quality of the built environment.

6.40 The built heritage policy relates to the reuse, maintenance and repairs of Listed Buildings and heritage assets and, therefore, makes a positive contribution to this objective. This is relevant because there are Grade II listed barns that are on the SDNPA Buildings at Risk Register. The plan would be stronger if the special character of the Conservation Areas in the plan area were described in the supporting text along with features that are sensitive to

change. However, this would require additional evidence being obtained as there is no current Conservation Area appraisal for these designated areas of the parish. Obtaining this information is not proportional to producing the FNP. Policies in the SDNPA Local Plan will ensure the protection and enhancement of the Conservation Areas in the parish.

- 6.41 The design policy is likely to have a strongly positive effect. This contains detailed requirements for the design of new development that are directly relevant to the area. The supporting text clearly sets out the local features that form part of the built environment. The policy on extensions (FITT7) is unlikely to have a negative effect on this objective as it cross refers to other policies in the plan. However, its effect on the built environment is difficult to predict.
- 6.42 Although the objective on design and character seeks to secure development that incorporates renewable and low carbon energy there is no mention of this in any of the policies. If this is included there should also be a strong caveat to ensure that such technology does not detract from the high quality landscape and built environment of the parish.

Policies	Landscape FITT1	Biodiversity FITT2	Water Environment FITT3	Built Heritage FITT4	Design FITT5	Community Shop FITT6	Extensions FITT7
Appraisal	+	-	-	+	++	?	?

Housing objective

- 6.43 Two of the policies in the plan are likely to have a negative effect on this objective. These are the policies that seek to protect and enhance the local built and natural environment. Such policies could restrict the number of houses that can be built in the plan area. The effect of the water environment policy is less easy to predict but it has the potential to restrict development potential in the area. No changes are suggested to the policies by way of mitigation because although the policies are likely to restrict development the need to protect and enhance the high quality environment of the parish overrides this aspect given its location in a national park.
- 6.44 The design policy would have a strongly positive effect as it seeks to ensure that new development reflects the need for smaller units to meet local housing need. In addition, the built heritage policy encourages the reuse of heritage assets which could result in such buildings being used for residential.
- 6.45 Two policies could have an indirect positive effect. Policy FITT7 is positive because it seeks to restrict large extensions that would result in the loss of small dwellings. The provision of a new community shop would be indirectly positive to this objective by providing a local facility for occupants of the new housing.

Policies	Landscape FITT1	Biodiversity FITT2	Water Environment FITT3	Built Heritage FITT4	Design FITT5	Community Shop FITT6	Extensions FITT7
Appraisal	x	x	?	+	++	+	+

Water objective

- 6.46 The policy relating to the water environment is strongly positive in relation to this objective. It seeks to reduce surface water run-off and ensure that the risk of flooding both on site and off site is minimised.
- 6.47 The landscape and biodiversity policies could have an indirectly positive effect on this objective. Enhancing landscape and biodiversity, for example through retaining or reinforcing hedgerows and trees can help to reduce rates of surface water run-off and, therefore, flood risk.
- 6.48 The policy seeking to provide a new community shop seems to suggest that the existing village centre car park will be used to access this facility. However, if additional parking is provided this would increase the area of hard standing and could increase surface water run-off. However, this is unlikely to be a large area and is not near the parts of the village that have been affected by flooding so any effect is unlikely to be significant. If additional car parking is provided the policy could be strengthened by encouraging the use of an appropriate surface to reduce the rate of surface water run-off.
- 6.49 Although the design policy is unlikely to have a negative effect on this objective it could be strengthened by cross reference in the text to policy FITT3 and the problems of surface water flooding in the area. The policy could include a requirement for the use of appropriate design and materials to reduce the problems of surface water flooding
- 6.50 Additional supporting text should refer to the fact the plan area is in a Groundwater Protection Zone. New development should ensure that they do not impact on this zone and, therefore, affect water quality.

Policies	Landscape FITT1	Biodiversity FITT2	Water Environment FITT3	Built Heritage FITT4	Design FITT5	Community Shop FITT6	Extensions FITT7
Appraisal	+	+	++	-	-	?	-

Sustainable transport objective

- 6.51 Transport is not addressed extensively in the plan because this is a rural area containing a small village and other smaller settlements giving very limited opportunities to increase sustainable transport provision. Overall, therefore, most of the policies in the plan are not relevant to this objective.
- 6.52 Nevertheless, development can support an increase in the use of sustainable forms of transport to reduce local traffic generation. This is principally contained in policy FITT5 on design. The supporting text could refer to the local transport concerns and why the plan, therefore, seeks to improve connectivity in Fittleworth village for pedestrians.
- 6.53 Policy FITT6 would have a positive effect on this objective as the provision of a shop in Fittleworth village would reduce the need to travel by car to other villages and towns

outside of the parish. This would reduce traffic in the area; though the impact is not likely to be significant.

Policies	Landscape FITT1	Biodiversity FITT2	Water Environment FITT3	Built Heritage FITT4	Design FITT5	Community Shop FITT6	Extensions FITT7
Appraisal	-	-	-	-	++	+	-

Vital community objective

- 6.54 The environmental policies in the plan are neutral in terms of this objective. The strongly positive policy relates to providing a new community shop in the village. There are limited opportunities to provide a greater range of facilities in the village given the small scale of development that is likely to be acceptable in this parish. However, if the community shop is provided where the existing playground is located a new, and potentially larger, playground might be provided.
- 6.55 Three other policies would have an indirect positive effect on creating a vibrant community by creating a balanced demography through the provision of smaller houses. Policy FITT7 seeks to retain a stock of smaller properties in the area by restricting large extensions. This ensures that the housing stock contains properties that are suitable for couples, smaller families or older people wishing to downsize.
- 6.56 The built heritage policy (FITT4) seeks to ensure that heritage assets are reused and maintained. This could provide more residential units in the plan area. Likewise the design policy (FITT5) recognises the need for smaller units of accommodation to meet local housing needs.
- 6.57 Heavy traffic flows and speeding traffic is an environmental issue that concerns local residents. It relates to the vitality of the community due to the noise and disruption this causes. The plan contains a community aim relating to this issue but there is no policy in the plan as this is primarily the concern of the local Highway Authority. There is a reference to this issue in the supporting text relating to new housing development (policy FITT8).

Policies	Landscape FITT1	Biodiversity FITT2	Water Environment FITT3	Built Heritage FITT4	Design FITT5	Community Shop FITT6	Extensions FITT7
Appraisal	-	-	-	+	+	++	+

Rural economy objective

- 6.58 Given the rural location of the plan area and the fact that it is situated in a national park there are limited employment opportunities locally. However, the baseline data indicates that some residents (12%) work from home. The provision of a new community shop may not provide employment as this could be run by volunteers. The reuse of heritage assets could provide opportunities for local employment but such opportunities are likely to be limited.

- 6.59 In principle the environment policies on landscape and biodiversity would have a negative effect on this objective as they would restrict developments related to the economy. However, few such proposals are likely so this affect would not be significant and no changes to the plan are suggested that would mitigate this effect.
- 6.60 The policies relating to water environment and extensions are neutral as they do not have effect on this objective.

Policies	Landscape FITT1	Biodiversity FITT2	Water Environment FITT3	Built Heritage FITT4	Design FITT5	Community Shop FITT6	Extensions FITT7
Appraisal	X	X	-	+	+	?	-

Appraisal of alterative policy options

- 6.61 The main alternative option to the policies in the plan is the “do nothing” scenario; that is not developing a neighbourhood plan for Fittleworth. Higher level plans are likely to ensure that the high quality natural and built environment is protected and enhanced. However, policies in the plan give this extra weight and also include aspects that are importantly locally. For example, the policy on design allows the local community to shape the type and form of development in the parish.
- 6.62 The main negative aspect without the plan is the provision of smaller affordable housing units. The evidence base demonstrates that this is an important issue for the area. The plan allows more housing to be developed than suggested by the SDNPA on the basis that this is providing much needed homes for local people. There is also an emphasis on these being smaller units. This aspect is also reinforced by policy FITT7 which seeks to control the size of housing extensions so that smaller dwellings in the area are retained. Furthermore, without the plan the local community would have less control over the location of the new housing proposed in Fittleworth village.
- 6.63 It is less likely that a new community shop would be developed for the village if the FNP was not developed. It also gives greater control over the location of this development to ensure that the community hub in the centre of the village is maintained and enhanced. This would not only benefit the community but also ensure that the facilities here are more accessible, with the potential for reducing cars accessing these services.
- 6.64 Developing the Neighbourhood Plan has allowed local environment issues to be raised and policies put in place to address these. One such issue is surface water flooding. Policy FITT3 seeks to ensure that all new development minimises this risk; both to the development itself and off-site.

- 6.65 The final local issue is the amount and speed of traffic on the main roads through Fittleworth village. Although there is no policy on this because this is beyond the scope of the plan, the FNP provides an opportunity to draw attention to this local highway issue and seek to influence the provision of traffic management and calming measures to address this concern.

Cumulative effects

- 6.66 The positive cumulative effect of the plan is the provision of much needed affordable housing. In turn this would have a positive effect on the vibrancy of the community.
- 6.67 There is potential for some negative cumulative effects on biodiversity, landscape, heritage assets and flooding. However, the HRA has provided a series of recommend policy amendments to avoid and/or mitigate impacts to ensure no adverse effects. Mitigation measures for the potential effects on landscape and heritage assets are also proposed in the SA. The scale of the development in the plan is unlikely to result in a significant negative effect on flooding. In addition, a policy in the plan seeks to address this issue. Overall there are unlikely to be significant negative cumulative effects from the policies and site allocations in the FNP.

7. Mitigation and monitoring

- 7.1 There is the potential for some negative effects from the policies and allocated sites in the FNP. An important part of the SA process is to identify potential effects and mitigation measures that can offset or reduce these. SA can also assist in strengthening the plan by suggested enhancements which will realise more positive outcomes. The final part of the SA process is to monitor outcomes during the lifetime of the plan to ensure that the predicted outcomes are realised and for action to be taken where this is not the case.

Summary of the mitigation measures

- 7.2 In terms of the negative effects these have been identified for impact on ecology, heritage assets, landscape and increased flood risk. Mitigation measures for the allocated sites and the windfall site are proposed in section 6 of the SA. These would require amendments to policy FITT9 and are set out in Table 4. In terms of the other policies in the plan some mitigation measures and potential areas for enhancement are proposed. These were identified earlier in the SA but are summarised in Table 5. It should be noted that the mitigation measures for FITT9 and those listed in Table 5 have been included in the Submission FNP.

SA Framework Objective	Issue	Mitigation Measure/ Option to Strengthen
Landscape Character	Tranquility and dark skies are mentioned in the plan as contributing to this objective	Strengthen the plan by indicating which areas of the parish are most tranquil and dark, and, therefore, sensitive to change.
Biodiversity	Habitats and wildlife corridors not mentioned in the plan	Strengthen policy FITT2 to state that existing habitat networks

		and wildlife corridors should be protected and enhanced
Built Environment and Heritage	The objective on design and character seeks to secure development that incorporates renewable and low carbon energy there is no mention of this in any of the policies.	Add this aspect to the design policy FITT5 but ensure there is a strong caveat to ensure that such technology does not detract from the high quality landscape and built environment of the parish.
Water	No mention of flooding in the design policy.	Strengthen the design policy by adding the use of appropriate design and materials to reduce the problems of surface water flooding. This could be either in the policy or the supporting text with a cross reference to policy FITT3.
Water	No mention in the plan to the Groundwater Protection Zone	Additional supporting text should refer to the fact the plan area is in a Groundwater Protection Zone. New development should ensure that they do not impact on this zone and, therefore, affect water quality.

Table 5 – Summary of the mitigation measures/options to strengthen the policies

Monitoring

- 7.3 The ongoing aspect of undertaking an SA/SEA is the requirement to monitor the significant effects of the plan which has been appraised. This is to ensure that the mitigation measures are being effective and the positive aspects are also being realised. If this is not the case then action can be taken. Furthermore, this can then be used to inform future iterations of the plan.
- 7.4 The monitoring regime for the FNP is set out in Table 3 which includes the SA Framework. The most significant effect to monitor is the provision of affordable housing and the creation and retention of smaller residential units.
- 7.5 Although none of the potential negative effects of the plan are likely to be significant it would be advisable to monitor biology, heritage, landscape and flooding indicators to confirm that this is the case so that action can be taken if negative effects emerge and to inform future iterations of the plan. The relevant indicators which could form the monitoring regime are set out in Table 3.

8 Summary and Update

- 8.1 This report presents the findings of the SA and the SEA process for the Pre Submission Draft of the Fittleworth Neighbourhood Plan. An appraisal has been undertaken of the strategic aspects of the plan as well as the reasonable alternatives which were considered during the preparation of the plan. This included changes to the settlement boundary and the main alternative options for sites to be allocated for housing. The policies were appraised as well as the “do nothing” scenario for the effects on the SA objectives if the policies in the plan were not in place. Recommendations have been made for changes that would strengthen

the plan and also mitigate any potential significant effects. Finally, a set of indicators is included in the SA for monitoring these significant effects.

- 8.2 The SA/SEA was published for consultation alongside this Draft of the Neighbourhood Plan under Regulation 14 of the Neighbourhood Planning Regulations 2012 for a period of 6 weeks from 15 January 2018 to 26 February 2018.
- 8.3 The comments received during the consultation period did not result in substantive changes to the plan or amendments that are likely to have a significant socio-economic or environmental effect on the plan area. No further appraisal of the Submission version of the plan was, therefore, required. In addition, no consultation responses were received on the content of the SA. The final SA report forms part of the evidence base for the Submission Fittleworth Neighbourhood Plan.

APPENDIX 1**Comments on the Scoping Report**

The following tables summarises the comments that were received from the Statutory Consultees and other organisations during the consultation on the Scoping Report. It indicates the changes that have been made to this report and as a result of these comments.

Consultee	Comments	Modifications
Natural England	For the baseline information have different sections for landscape character and ecology as these involve separate legislative issues and considerations	Changes made in the updated Scoping Report
	Add policy SP13 from the South Downs National Park Local Plan – Preferred Options in relation to the sites with international designation and which includes a specific reference to the Mens Special Area of Conservation (SAC)	Updated list of relevant policies included as an updated appendix to the Scoping Report
	A Habitat Regulations Assessment should be completed for the FNP due to the proximity of the Mens SAC	This has now been completed and the outcome of the HRA are included in the SA report
	Additions to the baseline information:- <ul style="list-style-type: none"> - reference to Arun SSSI - importance of retaining and enhancing ecological networks and ancient woodland given greater emphasis as this is of specific relevance to Fittleworth parish - add geology and not just ecology for SSSI's - identify and include priority habitats and species 	Most of these have been amended in the updated Scoping Report. The second and third point have also been included in the SA report
	Modifications to the SA Framework:- <ul style="list-style-type: none"> - mention geology in the biodiversity section - remove “settings” in relation to SSSI's and SAC 	Most of the points have been picked up through amendments to the updated Scoping Report and reflected in the SA report. The priority species have not been included as an assessment criterion in the SA Framework but have been identified in the allocated sites.

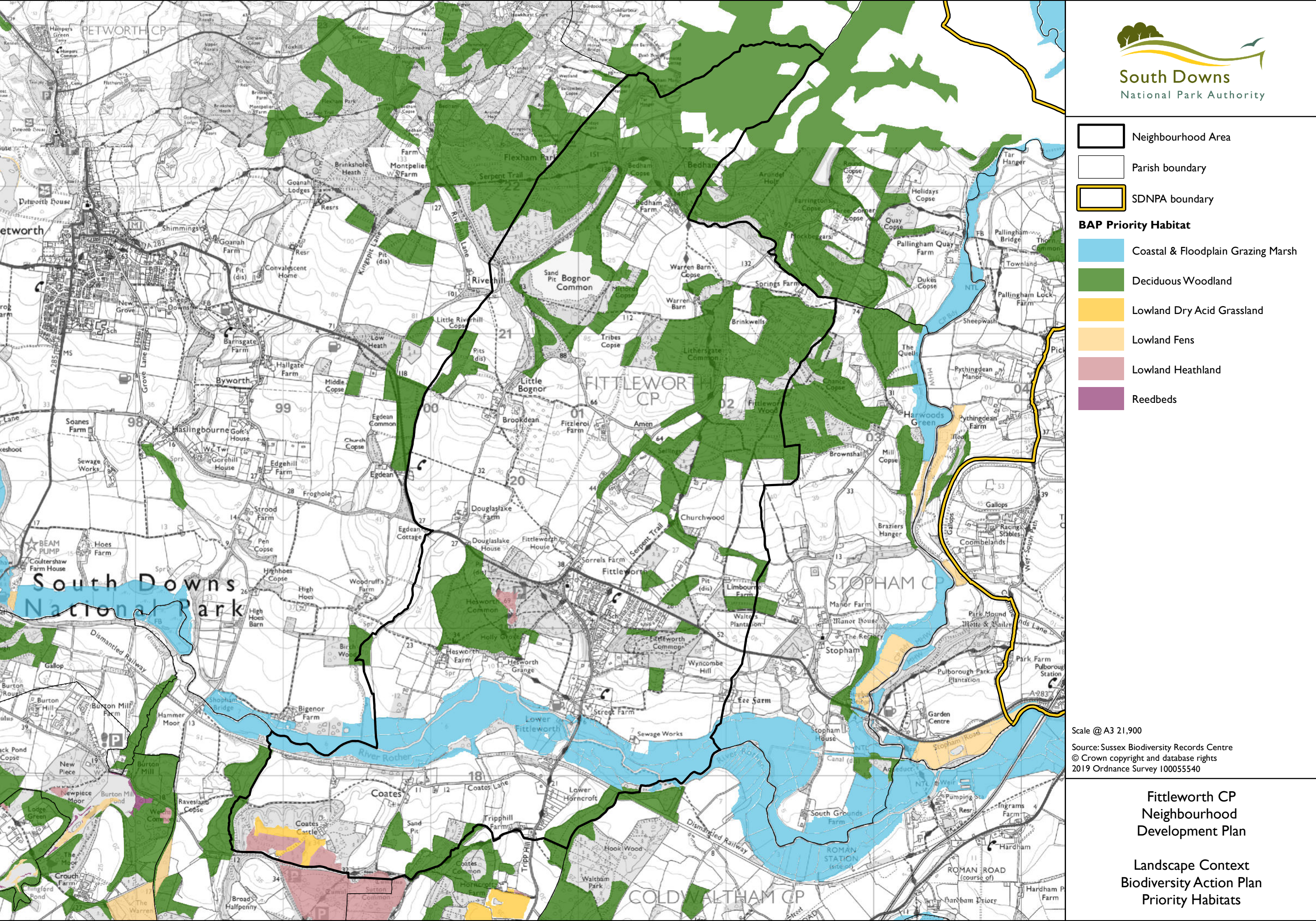
	<ul style="list-style-type: none"> - omit measure relating to The Mens SAC as the HRA will address this issue - Biodiversity objective to include the retention and enhancement of habitat networks and wildlife corridors - Add priority habitats and species relevant to the parish in the assessment criteria 	
	Consider Ecosystem Services as a theme in the SA	<p>No change.</p> <p>Comment from the SDNPA - The SDNP Local Plan is taking an Ecosystem Services approach and Natural England is correct in identifying that it is a key theme driving the SDNP's emerging Local Plan. However, the suggestion that the Fittleworth NDP should take this approach in their Neighbourhood Plan seems unreasonable given the scale of development proposed in the Fittleworth Neighbourhood Plan (FNDP). The FNDP is being encouraged to take a proportionate approach to preparing their NDP and we have advised the group to focus on providing allocations and other relevant policies.</p> <p>The SDNP Local Plan are developing their ecosystems services approach and once the SDNP Local Plan is made (Adopted) we will be in a better position to advise and assist groups in taking this approach in their own NDPs</p>
	SDNP policy 13 should be referenced at the screening stage	No change – it is not possible to change the Screening Opinion at this stage
Environment Agency	Add an objective relating to Source Protection Zone which is a sensitive groundwater area which covers the Neighbourhood Plan area	Change made to the Scoping Report
	Include relevant policies for the local Strategic Flood Risk Strategies and the South East River Basin Management Plan	Appendix added to the Scoping Report
Historic England	Baseline information – separate historic environment from the Housing and Built Environment section	Amendment made to the updated Scoping Report
	Update baseline to include non-designated heritage assets	Amendment made to the updated Scoping Report

	Add maps with the distribution of recorded heritage assets and landscape features to aid with identifying suitable sites for development	Maps of designated sites added to the updated Scoping Report
	Baseline to include information on current issues affecting heritage assets and trajectory of their condition	Update to include buildings on the SDNPA Buildings at Risk Register. No trajectory is available
	Amend SWOT table to identify any current significant issues affecting the heritage assets in the parish which the plan might have the opportunity to address	No significant issues identified that affect heritage assets
	Amend SWOT table to identify potential threats to the historic environment and heritage assets	This information is not available
	Modify the SA Framework to include protecting the setting of historic assets	Change made to the Scoping Report and SA
	Identify evidence gaps e.g. if development is being located within a Conservation Area or its setting it would be desirable to prepare an appraisal of the Conservation Area	Conservation Area Appraisal have not been published for these designated areas of the parish; noted as a gap in the evidence base in the SA
Chichester District Council	Correct title of the adopted Local Plan for the area outside of the South Downs National Park is the Chichester Local Plan – Key Policies 2014 - 2029	Change made to the Scoping Report
	Minor word changes in paragraph 2.42	Change made to the Scoping Report

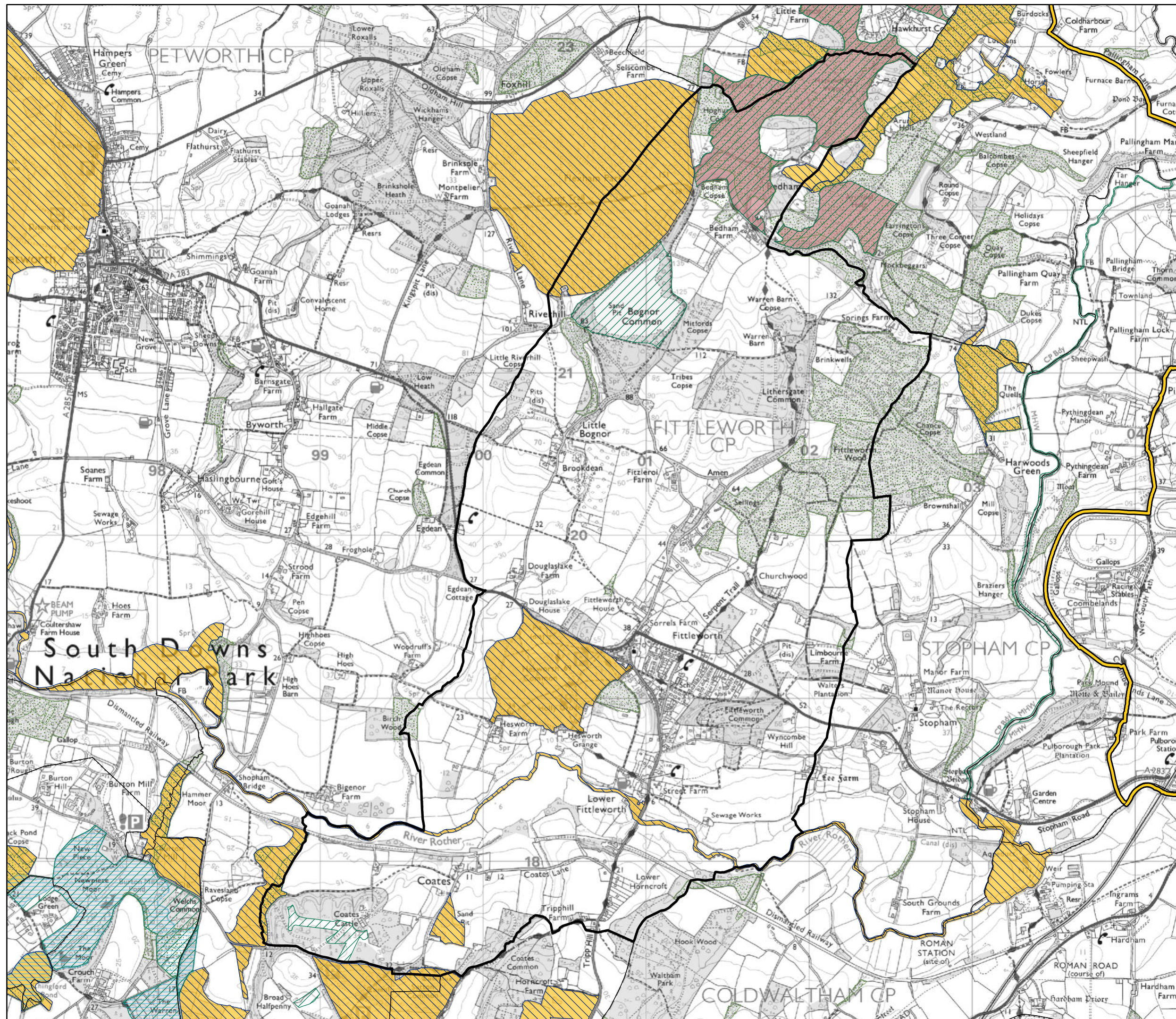
Appendix 2 to SA (Appendix 4)

Environmental assets of Fittleworth

- 1 Biodiversity Action Plan Priority Habitats**
- 2 Biodiversity**
- 3 Flood Zones and River Corridor**
- 4 Historic Environment**
- 5 Historic Landscape**
- 6 Indicative Landscape Character Assessment**
- 7 Public Rights of Way**
- 8 Relative Tranquillity**



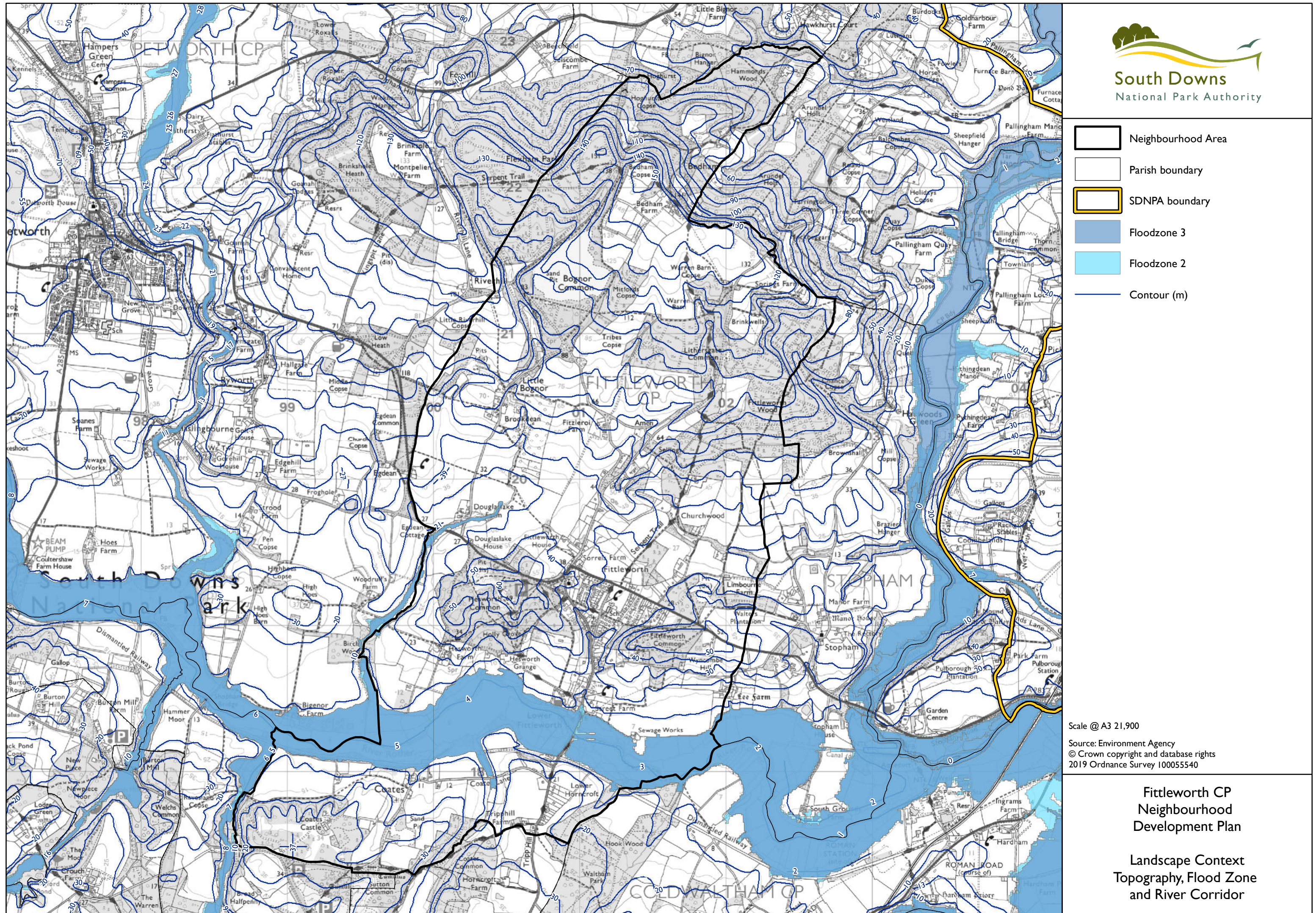
- Neighbourhood Area
- Parish boundary
- SDNPA boundary
- SSSI
- Site of Importance for Nature Conservation
- Ancient Woodland
- Local Nature Reserves
- Local Wildlife Sites
- Special Area of Conservation

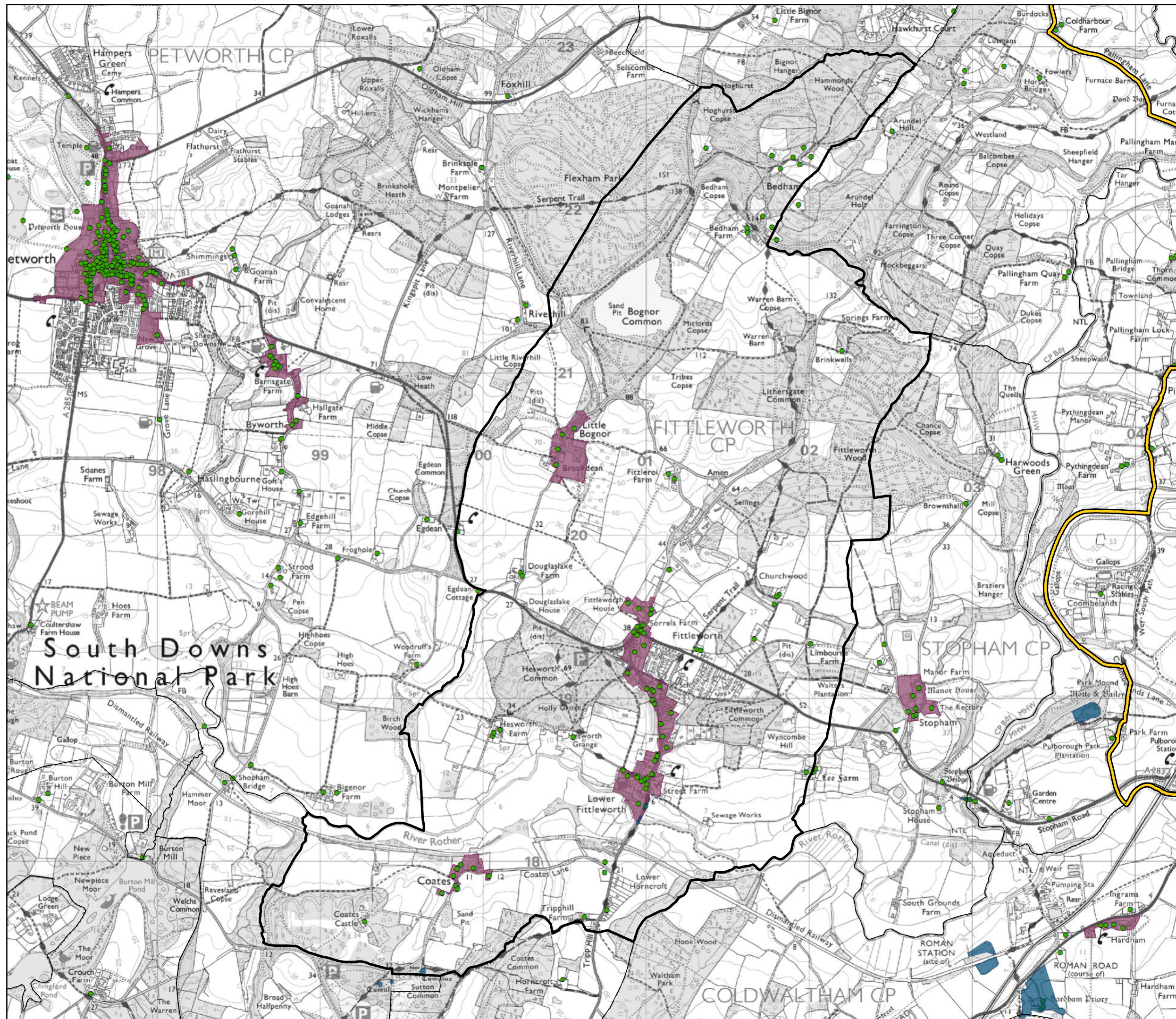


Scale @ A3 21,900
Source: Natural England; Hampshire County Council; Sussex Biodiversity Records Centre
LWS: this data is derived from field survey and and or aerial photographic interpretation and is the best available data there is but may be out of date in places
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Fittleworth CP
Neighbourhood
Development Plan

Landscape Context
Biodiversity



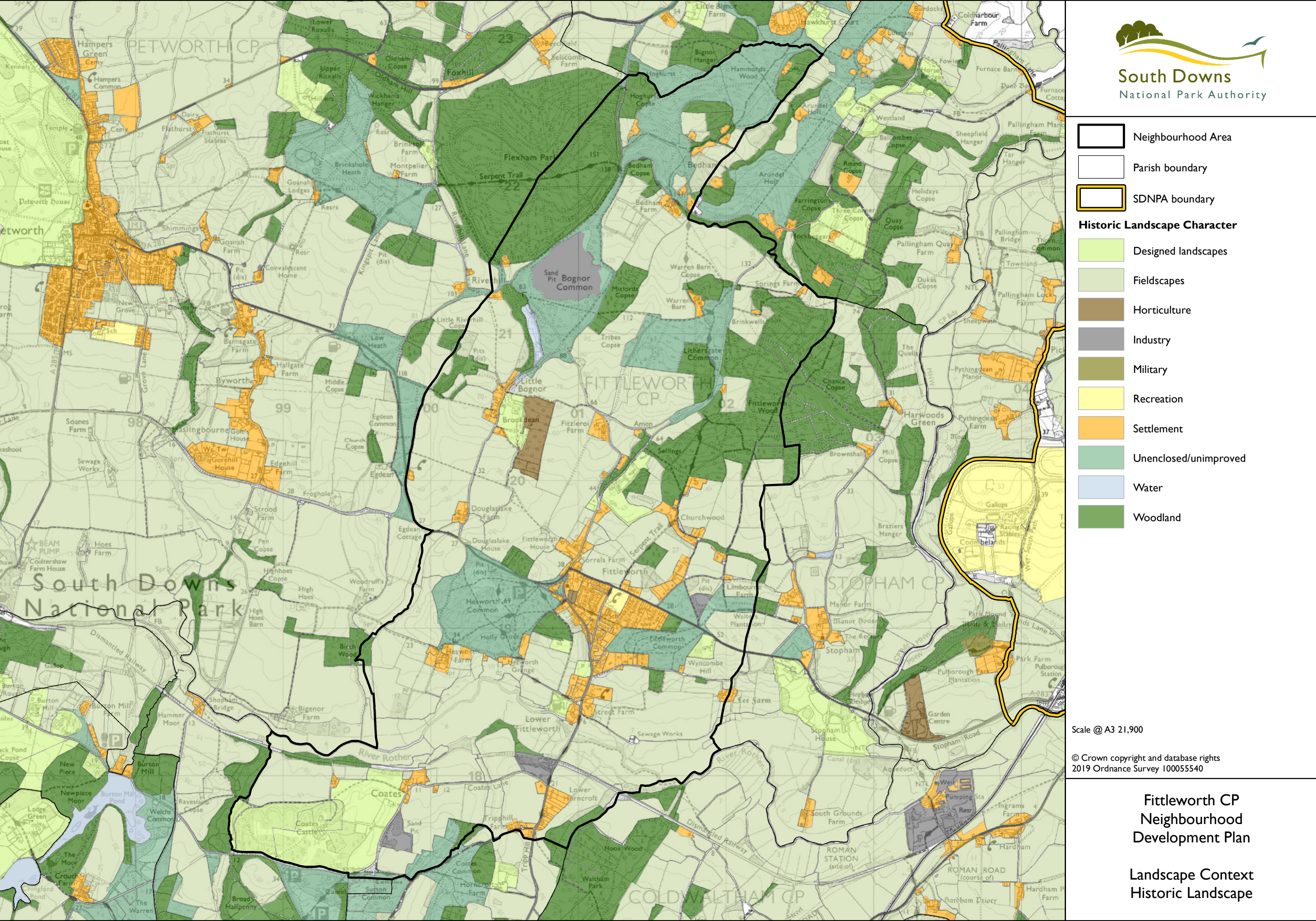


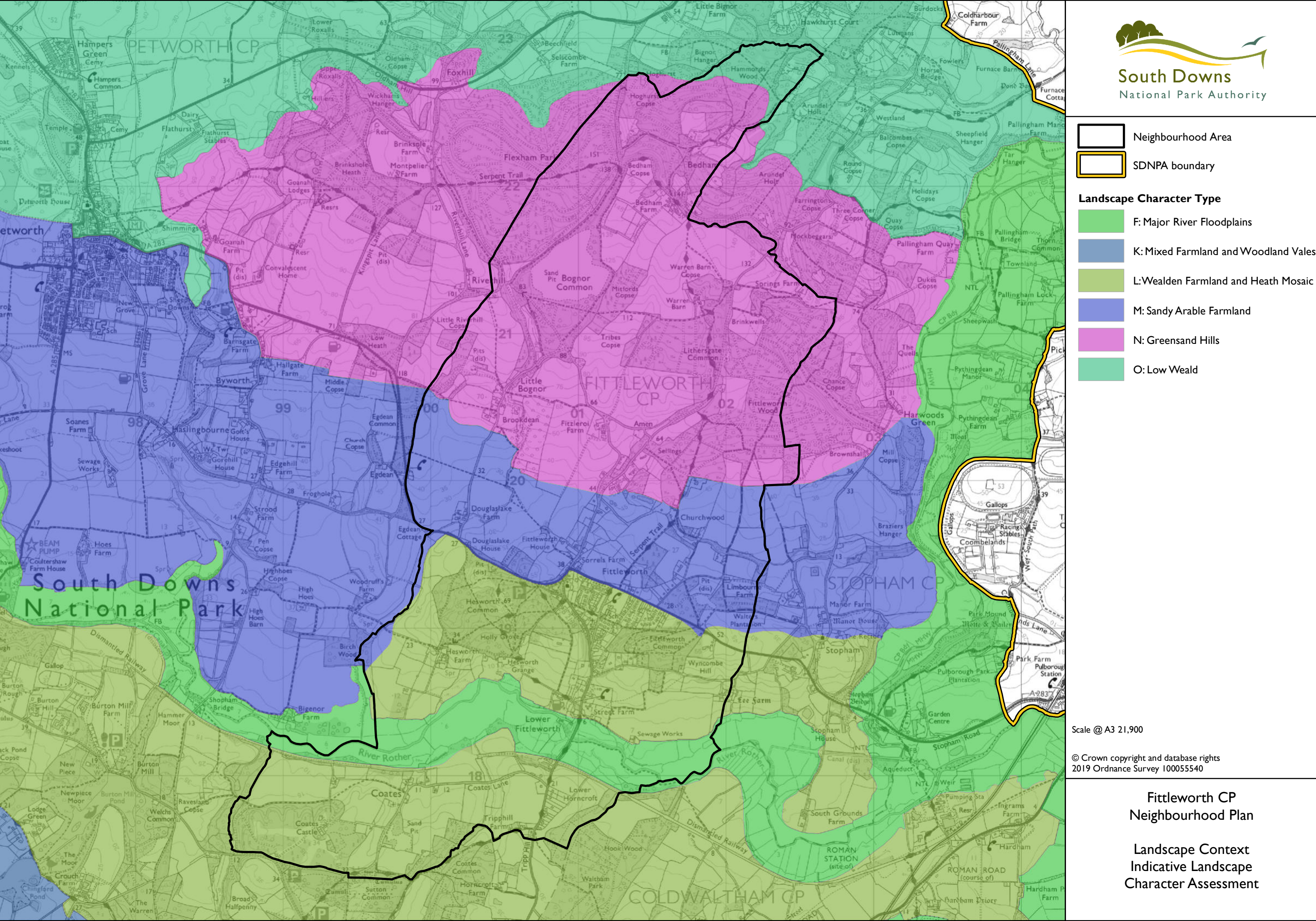
- Neighbourhood Area
- Parish boundary
- SDNPA boundary
- Listed building
- Scheduled Monument
- Conservation Area

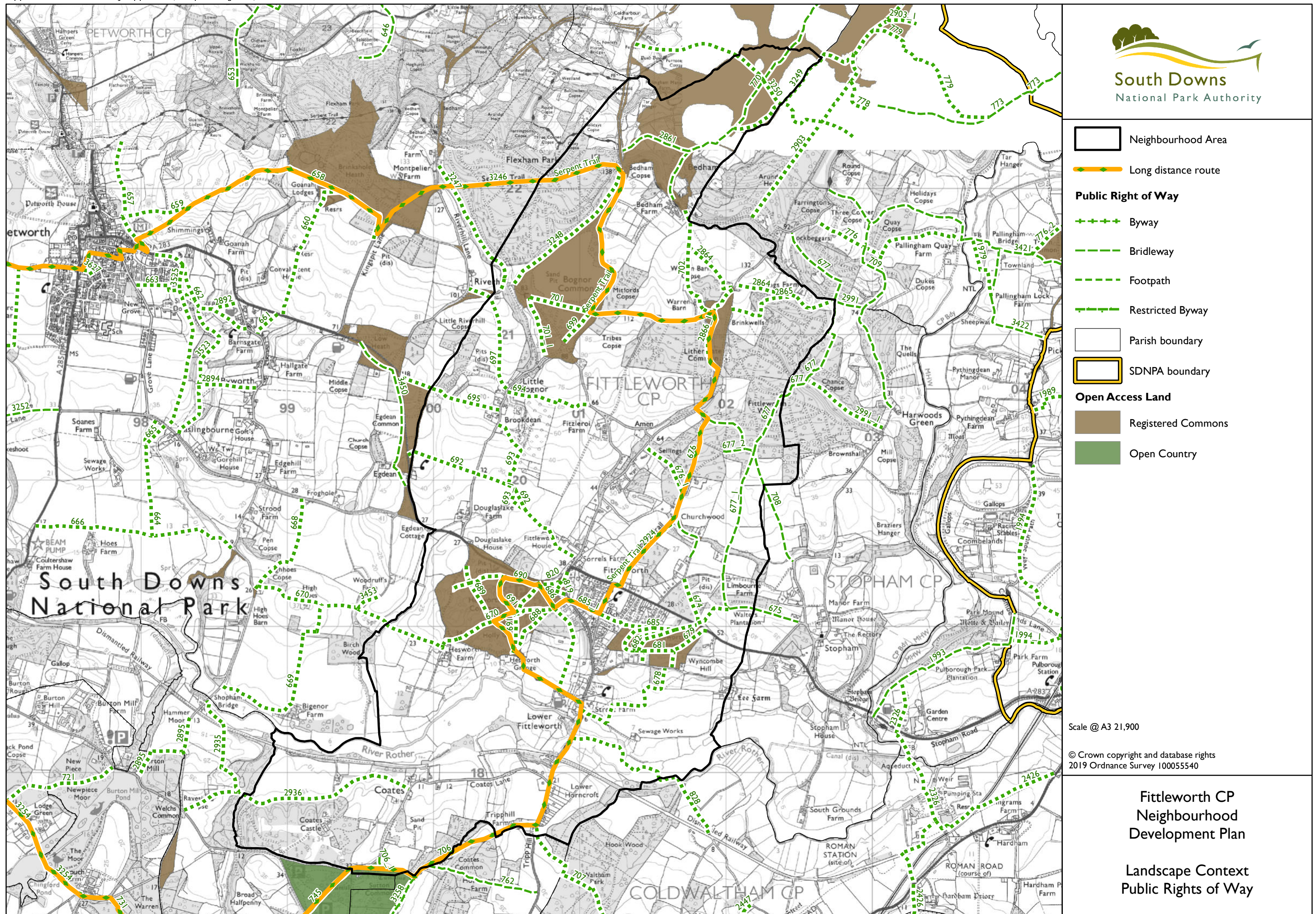
Scale @ A3 21,900
Source: English Heritage
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Fittleworth CP
Neighbourhood
Development Plan

Landscape Context
Historic Environment







Appendix 4: Sustainability Appraisal (incorporating SEA)

