



# **UPPER BEEDING NEIGHBOURHOOD PLAN**

**Upper Beeding Parish Council**

## **SUSTAINABILITY APPRAISAL INCLUDING THE STRATEGIC ENVIRONMENTAL ASSESSMENT**

**Submission Version**

**December 2018**

## CONTENTS

	<b>Page</b>
<b>1. Introduction</b>	<b>3</b>
<b>2. Background &amp; Context</b>	<b>5</b>
<b>3. Appraisal Methodology</b>	<b>7</b>
<b>4. Regulation 14 Consultation and Scoping Report Comments</b>	<b>9</b>
<b>5. Parish Profile</b>	<b>11</b>
<b>6. Plans and Programmes</b>	<b>35</b>
<b>7. Sustainability Issues</b>	<b>40</b>
<b>8. Sustainability Appraisal Framework - Objectives</b>	<b>45</b>
<b>9. Policy Approaches and Options for Site Allocations</b>	<b>50</b>
<b>10. Appraising the Neighbourhood Plan Policies</b>	<b>66</b>
<b>11. Appraisal of alternatives and the cumulative effects of the plan</b>	<b>68</b>
<b>12. Mitigating and Monitoring</b>	<b>71</b>

## APPENDICES

- A Horsham District Council's checklist**
- B Responses to Scoping Report**
- C Relevant Plans and Programmes**
- D Assessed Sites**
- E Assessed policies**
- F Table of all policies assessed**

## 1 INTRODUCTION

- 1.1 This report forms the Submission Sustainability Appraisal (SA) of the Submission Upper Beeding Neighbourhood Plan (UBNP). A Neighbourhood Plan (NP), once adopted, becomes a formal part of the planning system and will be a Local Development Plan document. The Upper Beeding Neighbourhood Plan is an important planning tool for shaping the development and growth of the parish.

### What is a Sustainability Appraisal?

- 1.2 A Strategic Environmental Assessment (SEA) is a requirement of the EC Directive 2001/42/EC (the 'Directive') on the assessment of the effects of certain plans and programmes on the environment. This is enshrined in UK law through the Environmental Assessment of Plans and Programmes Regulations 2004, which introduced environmental assessment as a requirement for most planning documents in the UK. A sustainability appraisal is more comprehensive than strategic environmental assessment since it covers the effects of plans on the economy and society, as well as the environment. By undertaking a sustainability appraisal of the NP, the requirements of the SEA Directive are fulfilled. **Appendix A** sets out the checklist provided by Horsham District Council which shows where the SEA requirements are addressed in the report
- 1.3 A Sustainability Appraisal (SA) is conducted in conformity with the SEA Directive. However, while an SEA is concerned with environmental effects, the SA is an iterative process that considers the environmental, social and economic consequences of a plan and its policies and seeks to identify ways of achieving a proper balance between these three considerations. For simplification, this report is referred to as the Sustainability Appraisal throughout.
- 1.4 An SA is a systematic process to promote sustainable development by assessing the extent to which a neighbourhood development plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. It is also a means of identifying and mitigating any potential adverse impacts that the neighbourhood development plan might have. This can ensure that the policies in the plan are the most appropriate, given the reasonable alternatives.
- 1.5 The first stage of the process is a Screening Opinion. This is to determine if a Neighbourhood Plan is to have significant environmental effects. Horsham District Council

(HDC) issued its screening opinion on 21 October 2014 having consulted with the statutory consultees. It has stated that an SEA is required given the likely intention of the UBNP to contain policies allocating land for development. HDC would prefer this is undertaken as part of a wider SA/SEA.

- 1.6 This Assessment appraises the options (or reasonable alternatives) considered through the preparation of the Upper Beeding Neighbourhood Plan, and subsequently the policies contained within the Submission Neighbourhood Plan, against the sustainability framework developed through the Scoping Report. This will help gauge the extent to which the Plan contributes towards sustainable development.
- 1.7 The Upper Beeding Neighbourhood Plan must be in conformity with higher level planning policy, primarily the Horsham District Planning Framework 2015 (HDPF), but it is also important to ensure conformity with the Submission South Downs Local Plan 2018 prepared by the South Downs National Park Authority (SDNPA). These documents have been subject to their own sustainability appraisal (incorporating a strategic environmental assessment) and this report has been informed by information contained within those assessments.

## 2. BACKGROUND AND CONTEXT

### What is Sustainable Development?

- 2.1 Sustainable development is defined as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”. It is about ensuring better quality of life for everyone, now and for generations to come. In doing so, social, environmental and economic issues and challenges should be considered in an integrated and balanced way.
- 2.2 The National Planning Policy Framework (NPPF) 2018 states the Government’s intentions with regards to sustainable development, in particular the need for the planning system to perform a number of roles:

- a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

### Consultation and Implementation

- 2.3 An important part of the SA process is consultation with statutory environmental bodies, wider statutory consultees and members of the community. The SA will be subject to the same statutory consultation arrangements as the Neighbourhood Plan. Consultation responses received in relation to the Scoping Report in June 2015 and August 2016 are set out in Chapter 4.

2.4 The draft SA (June 2018) was consulted on as part of the Regulation 14<sup>1</sup> Pre-submission stage. This exercise was undertaken between 25<sup>th</sup> June – 13<sup>th</sup> August 2018. Details regarding comments received are set out in Chapter 4.

---

<sup>1</sup> <http://www.legislation.gov.uk/uksi/2012/637/regulation/14/made>

### 3. APPRAISAL METHODOLOGY

#### Introduction

- 3.1 The appraisal methodology has been prepared taking into account the processes set out in the relevant guidance<sup>2</sup>.
- 3.2 The diagram below describes the different stages in the SA process and how they relate to the stages in the Plan production. The steps in stage A relate to the SA Scoping Report which was consulted on in June 2015 and August 2016. This is set out in more detail after the table.

STAGE	TASKS	COMPLETED
<b>A</b>	<b>Setting the context and objectives, establishing the baseline and deciding on the scope</b> <ul style="list-style-type: none"> <li>• Identifying other relevant plans and programmes</li> <li>• Collecting baseline information</li> <li>• Identifying problems</li> <li>• Developing objectives and the Sustainability Framework</li> </ul>	Sustainability Framework determined and set out in the Scoping Report. Baseline and Framework updated following feedback and comments.
<b>B</b>	<b>Developing the alternatives and assessing effects</b> <ul style="list-style-type: none"> <li>• Testing the plan objectives against SA/SEA objectives</li> <li>• Developing alternatives</li> <li>• Testing policy options against the SA/SEA objectives</li> <li>• Considering mitigation</li> <li>• Proposing measures to monitor effects</li> </ul>	Plan objectives, strategy and policies, plus all reasonable alternatives at this stage are set out and appraised within this SA.
<b>C</b>	<b>Prepare the Sustainability Appraisal Report</b>	This document forms the first stage of Stage C
<b>D</b>	<b>Consult on the SA Report</b>	Consultation undertaken on Pre-Submission SA June – August 2018. Consultation will be undertaken for the Submission version.
<b>E</b>	<b>Monitor implementation of the plan</b>	To be completed

<sup>2</sup> Sustainability Appraisal guidance within the DCLG Plan making Manual/SEA guidance from ODPM A Practical Guide to the Strategic Environmental Assessment Directive 2005

## **STAGE A: Setting the context and objectives, establishing the baseline and deciding on the scope**

### **Sustainability Appraisal of the Upper Beeding Neighbourhood Plan – Scoping Report (June 2015 and amended October 2016)<sup>3</sup>**

3.3 Many of the tasks outlined in Stage A were undertaken during the Scoping report stage. This included collecting the baseline information for Upper Beeding and developing the Sustainability Appraisal framework. These areas of work have been updated to take into account the responses received during the two consultation periods on the Scoping Report.

## **STAGE B: Developing the alternatives and assessing effects**

### **Predicting Sustainability Effects of the Draft Neighbourhood Plan**

3.4 Stage B is the main focus of this Report. This stage involves assessing the likely significant social, environmental and economic effects of the strategy and policies within the Neighbourhood Plan.

3.5 The main objective of appraising policy options is to highlight the different advantages and disadvantages of each option, with the aim of indicating that the preferred option is the most sustainable one. Symbols are used to record the performance of each option against each objective in the sustainability framework.

3.6 The assessment and predictions of the effect of policy options on the sustainability objectives is set out within the SA. These predictions and judgements have been made based on the background baseline information and the comments/feedback provided by the Parish Council through their discussions with the residents and local community.

## **STAGES C, D AND E: Prepare the SA Report, Consult and Monitor the Plan**

3.7 Stage C of the process is the preparation of this SA report and consultation at the stages set out in the Regulations.

---

<sup>3</sup> 1.8 The Scoping Report is located on the parish council's website <http://upperbeeding-pc.gov.uk/neighbourhood-plan/>.

#### 4. REGULATION 14 CONSULTATION AND SCOPING REPORT COMMENTS

##### Regulation 14

- 4.1 The Pre-submission version of the SA was consulted on at the same time as the UBNP. This was June – August 2018. A wide range of organisations were consulted including the environmental bodies, the County Council, South Downs National Park Authority and Horsham District Council. The local community was also consulted.
- 4.2 A range of detailed comments were received on most aspects of the NP. However – comments on the SA were limited. These are set out below together with the recommended response:

NP Paragraph No/ Policy No.	Suggested Change / Comment	Response
<b>Comments from Horsham District Council Neighbourhood Planning Team dated 13/08/18</b>		
SEA Background and Context	<i>Update the Economic, Social and Environmental roles.</i> The revised NPPF took effect on 24 July 2018. The text identified in these roles will need to be updated.	Noted. The SA has been updated to take on board the new NPPF.
Further work on reasonable alternatives	We are pleased to see that significant work on the alternatives and site assessment has been provided and consider that this significantly improves this document in terms of documenting the process which has been undertaken. It is however noted that in Appendix D there is a factual error - SA483 was concluded as being ' <i>not currently developable</i> ' in the SHELAA 2016. This will need to be amended. It is suggested that for ease of reference in Appendix D, the name of each objective is provided at the top of the table as well as the number (i.e. 1 – Housing, 2 – Community Facilities and so on). This will make it significantly easier to read this section of the document without further cross reference to an earlier section of the paper.	Noted. The SA has been amended.

- 4.3 The Scoping Report identified a number of social, environmental and economic sustainability issues facing the settlements. The Scoping Report was consulted on twice. The first was during 23<sup>rd</sup> June – 30<sup>th</sup> July 2015. However, as only a few comments were received, a

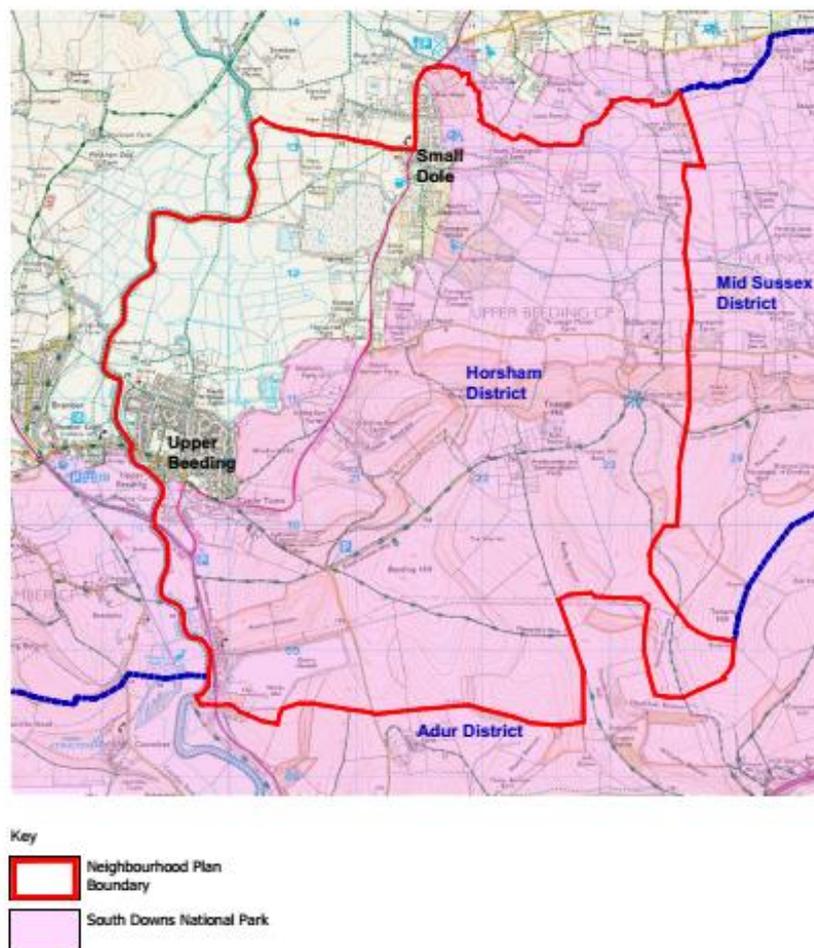
second consultation period was held between 18<sup>th</sup> July 2016 and 26<sup>th</sup> August 2016. The revised version (text only and not appendices) can be found on the Parish Council's website.

### **Consultation Responses on Scoping Report**

- 4.4 The consultation included the statutory bodies with environmental responsibilities – the Environment Agency, Historic England and Natural England as well as a number of other organisations and authorities. It was also placed on the Parish Council's website.
  
- 4.5 All the responses have been collated and those that are of relevance to the SA have been considered and incorporated within this document. A summary of the comments made and responses are set out in **Appendix B** of this report. No response was received from Historic England.

## 5. PARISH PROFILE

5.1 Upper Beeding Parish Council is part of the Horsham District, under the jurisdiction of Horsham District Council, situated in the County of West Sussex. The main settlements in the parish are Upper Beeding and Small Dole. From 2011 census data, the population of the parish is 3,736. The parish covers 1,877 hectares (4,637 acres). Upper Beeding is the larger settlement in the parish and is located next to Bramber village through the High Street to The Street connecting the two. The map below shows the Neighbourhood Plan boundary.



*Map 1: The Designated Upper Beeding Parish Neighbourhood Area*

5.2 The following statistics and evidence are primarily drawn from the 2011 Census. These are used to provide an overview of the current status of the community. Other sources of data or information are acknowledged where applicable. In some instances, other areas have been included for comparison and earlier statistics have been utilised so that trends can be identified.

5.3 In order to be able to identify the impact the Neighbourhood Plan will have on sustainable development, it is important to have an understanding of the baseline conditions that exist within the parish and the trends that may continue if there were no Neighbourhood Plan prepared. The information has been structured using a series of topics, which are predominantly influenced and derived from those set out in the SEA Regulations 2004, in particular Schedule 2.

Topic	Relevance to the Upper Beeding Neighbourhood Plan
Nature Conservation	Potential for new site allocations to impact on the habitats of species within areas of nature conservation value
Landscape	Potential for new site allocations to impact on the landscape value of the South Downs National Park
Water	Risk of flooding impacts on where people live and can impact on the economic prosperity of an area. The way in which water is drained off of land, including road and other hard surfaces, can be important to the level of flood risk experienced in an area.
Soil	Potential for site allocations and development to impact on best agricultural soils or important geological sites.
Heritage	Historic environment features can be vulnerable to damage and other impacts from neglect, decay or development pressures.
Air and Climate	Potential for new site allocations to create pollution through additional congestion.
Roads and transport	Development could impact on congestion on the road network and impact on road safety through increased car movements
Housing/Health/Community	The type of existing housing and housing needs and community requirements
Economic characteristics	Development could impact on the ability of communities to function effectively (in their interaction with services) and on the economic prosperity of an area.

5.4 The following sets out the key information and statistics for Upper Beeding<sup>4</sup>. The first section sets out some general characteristics and demographics.

### Location and General Characteristics

5.5 The parish is made up of a number of settlement areas and other significant land uses. These are:

1. Upper Beeding.
2. Small Dole; a small part of which is within Henfield parish.

<sup>4</sup> Stage 1 report – Full Evidence Summary Report - Upper Beeding Parish Council and AirS 2015

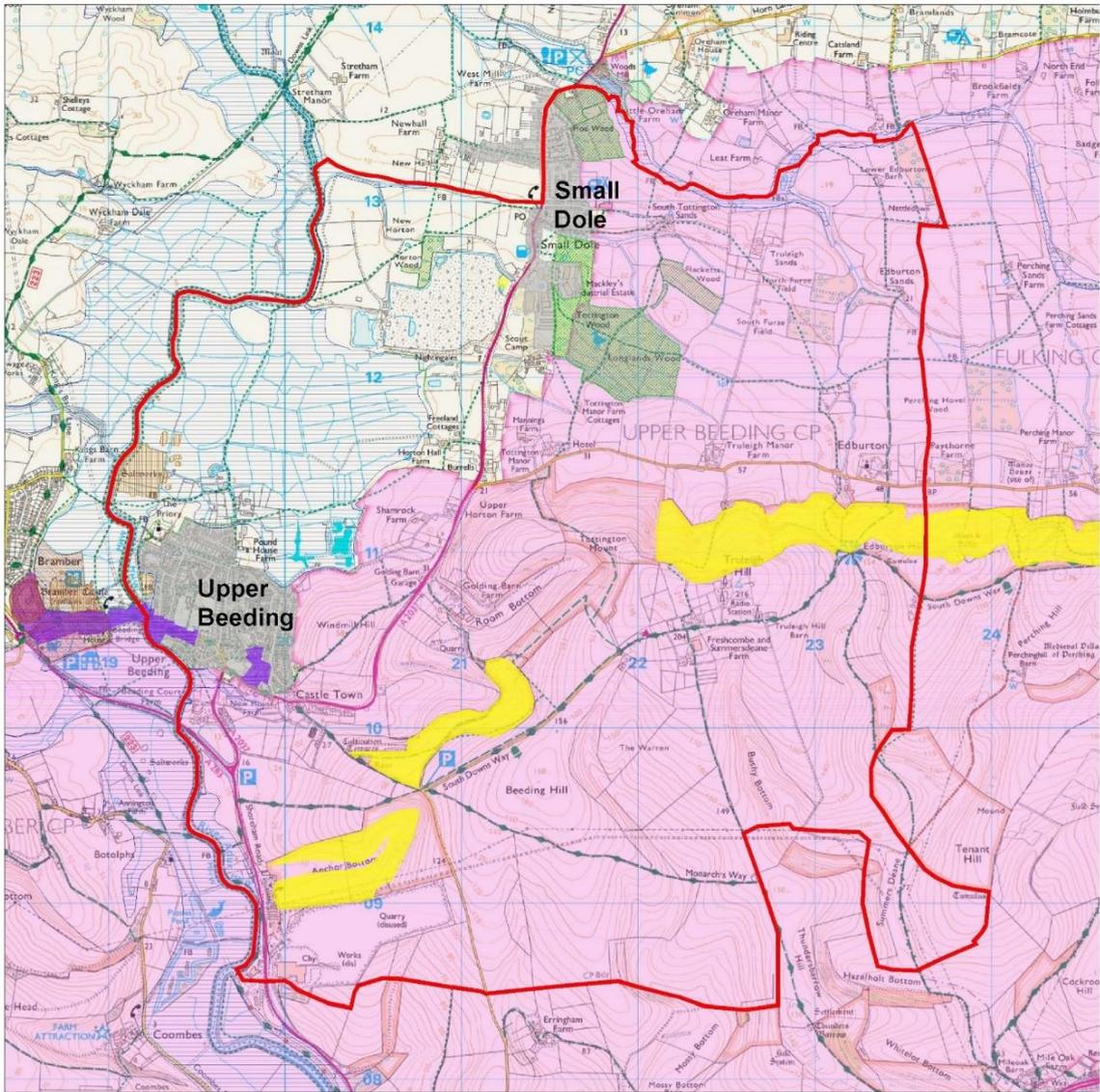
3. The South Downs National Park covers the southern part of the parish.
4. Horton Landfill site; a large landfill site adjacent to the southern part of Small Dole that is currently being remediated.
5. Tottington Wood, an ancient woodland adjoining the southern part of Small Dole.
6. Edburton.
7. Truleigh Hill.
8. The Cement Works; a large disused site within the South Downs National Park on the southern edge of the parish.
9. River Adur and its associated floodplain.
10. Mackleys Business Park.

5.6 The village of Upper Beeding lies on the east bank of the River Adur at the head of the Adur gap, where the river cuts through the downs to reach the sea at Shoreham some 8 km away. Its highest point is at 216m on Truleigh Hill and the lowest at sea level on the tidal River Adur. Soils in the village near the river consist of alluvial silts and gravels; clays and sands make up the Low Weald, and chalk predominates on the Downs and where houses climb the lower slopes such as on Windmill Hill.

5.7 The HDC Settlement Sustainability Review 2014 states that Upper Beeding has limited employment opportunities within the village although there are some nearby industrial estates. There are strong employment links with the south coast towns of Brighton and Worthing which is the main employment destination for residents in the village. Upper Beeding has a good range of community facilities including a primary school, village hall (shared with Bramber), recreation ground, sports hall and church halls, allotments and a branch surgery of Steyning Health Centre. There is also a range of local shops including a convenience store, hairdressers as well as some more specialist outlets. Other services and facilities including a wider range of retail outlets, leisure centre and secondary school are located in nearby Steyning – there is a ½ hourly bus service. Upper Beeding is located within a high quality environment adjoining the South Downs National Park.

5.8 Horsham District has a settlement hierarchy states that **Upper Beeding**, together with its neighbour Bramber have been designated as a Small Town and Larger Village. **Small Dole** is the only other settlement in the parish that has a built-up area boundary, although a small part of it is located in the parish of Henfield. Small Dole has been identified by Horsham District as a Smaller Village with good access to larger settlements although facilities, services and social networks are limited.

- 5.9 The northern parish boundary is Henfield parish, to the east is Fulking parish, to the West is Steyning parish and to the south/ south-west boundaries are Bramber Parish and Coombes parish. Shoreham-by-Sea (Adur District) is 4.5 miles away via the A283 and is the closest large area of urbanism. The nearest train station is at Shoreham-by-Sea. There is a low frequency bus route through Upper Beeding connecting residents to Worthing, Shoreham and Brighton and other settlements nearby.
- 5.10 The parish has hosted two large waste tips for the past forty years to the South of Small Dole. The second of which is in the restoration stage, but with additional tipping envisaged in the future, permission has been granted to infill a SSSI recognised site as stipulated by Natural England. Upper Beeding falls inside a Special Protection Zone (SPZ), as it takes its water supply from natural water tables in the chalk downs.
- 5.11 The map below is a parish context plan.



Key

 Neighbourhood Plan Boundary	 Sites of Nature Conservation Importance (SNCIs)	 Site of Archaeological Importance
 South Downs National Park	 Ancient Woodland	 Conservation Area
 Sites of Special Scientific Interest (SSSIs)	 Scheduled Ancient Monument	 Flood Zone 3

Map 2 – Context Plan

## Demographics

5.12 The usual resident population of the parish is 3,763 people<sup>5</sup> (1,828 male, 1,935 female). Of these:

- 671 People aged 15 and under (17.8% of parish population compared to 18.7% across the District and 19% across England)
- 2,375 People aged 16 to 64 (63.1 % of parish population compared to 61.9% across the District and 65% across England)
- 717 People aged 65 and over (19.1% of parish population compared to 19.4% across the District and 16% across England)

Age band	Parish Figure 2011 (number and %)	District Figure 2011 (number and %)
0 to 4	193 (5.1%)	7,151 (5.4%)
5 to 7	115 (3.1%)	4,379 (3.3%)
8 to 9	80 (2.1%)	2,872 (2.2%)
10 to 14	238 (6.3%)	8,469 (6.5%)
15	45 (1.2%)	1,672 (1.3%)
16 to 17	122 (3.2%)	3,551 (2.7%)
18 to 19	81 (2.2%)	2,653 (2.0%)
20 to 24	192 (5.1%)	5,660 (4.3%)
25 to 29	150 (4.0%)	5,858 (4.5%)
30 to 44	680 (18.1%)	25,242 (19.2%)
45 to 59	890 (23.7%)	29,115 (22.2%)
60 to 64	260 (6.9%)	9,109 (6.9%)
65 to 74	431 (11.5%)	13,130 (10.0%)
75 to 84	199 (5.3%)	8,717 (6.6%)
85 to 89	49 (1.3%)	2,356 (1.8%)
90 and over	38 (1.0%)	1,367 (1.0%)
All Usual Residents	3,763	131,301

Table 1 - Age structure of parish

<sup>5</sup>

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11129982&c=upper+beeding&d=16&e=62&q=6474260&i=1001x1003x1032x1004&m=0&r=1&s=1416574978800&enc=1&dsFamilyId=2474>

## Economic status of residents

5.13 Of the 3763 usual residents of the parish,

- 2,806 were aged between 16 and 74.
- 2,072 (73.8%) were economically active<sup>6</sup>.
- 1,034 were Employed full-time (36.8% compared to 40.3% across District)
- 423 were Employed part-time (15.1% compared to 14.8% across District)
- 454 were Self-employed (16.2% compared to 12.9% across District)
- 69 were Unemployed (2.5% compared to 2.7% across District)
- 92 were Full-time students (3.3% compared to 2.7% across District)

5.14 734 (26.2%) were economically inactive<sup>7</sup>:

- 469 were Retired (16.7% compared to 15.5% across District)
- 101 were Students (3.6% compared to 3.5% across District)
- 74 were Looking after home or family (2.6% compared to 4.2% across District)
- 58 were Long-term sick or disabled (2.1% compared to 2.2% across District)
- 32 were classified as Other (1.1% compared to 1.3% across District)

## Occupations

5.15 Of the 1,988 residents in the parish in employment and aged between 16 and 74:

- 274 were Managers, Directors and Senior Officials (13.8% compared to 14.1% across the District).
- 321 were Professional Occupations (16.1% compared to 19.1% across the District).
- 258 were Associate Professional and Technical Occupations (13.0% compared to 14.8% across the District).
- 205 were Administrative and Secretarial Occupations (10.3% compared to 11.8% across the District).
- 281 were Skilled Trades Occupations (14.1% compared to 11.1% across the District).

---

<sup>6</sup> Economically Active - All people usually resident in the area at the time of the 2011 Census aged 16 to 74 and who were economically active (either in employment, or not in employment but seeking work and ready to start work within two weeks, or waiting to start a job already obtained). As defined by ONS (2014).

<sup>7</sup> Economically Inactive - All people usually resident in the area at the time of the 2011 Census aged 16 to 74, who were economically inactive (anyone who was not in employment and did not meet the criteria to be classified as unemployed). As defined by ONS (2014).

- 210 were Caring, Leisure and Other Service Occupations (10.6% compared to 9.7% across the District).
- 150 were Sales and Customer Service Occupations (7.5% compared to 6.9% across the District).
- 108 were Process, Plant and Machine Operatives (5.4% compared to 4.3% across the District).
- 181 were in Elementary Occupations (9.1% compared to 8.1% across the District).

## Qualifications & Skills

5.16 Of the 3,092 usual residents in the parish aged 16 and over:

- 576 possessed no qualifications (18.6% compared to 19.5% across the District).
- 461 possessed Level 1 qualifications (14.9% compared to 11.6% across the District).
- 570 possessed Level 2 qualifications (18.4% compared to 15.9% across the District).
- 127 possessed Apprenticeship qualifications (4.1% compared to 3.4% across the District).
- 417 possessed Level 3 qualifications (13.5% compared to 12.8% across the District).
- 828 possessed Level 4 and above qualifications (26.8% compared to 32.4% across the District).
- 113 possessed other qualifications (3.7% compared to 4.4% across the District).

## Industry of employment

5.17 The 1,988 usual residents aged between 16 and 74 in employment are employed in the following industries:

Industry	Parish Figure 2011 (number & %)	District Figure 2011 (number & %)
Activities of Extraterritorial Organisations and Bodies	1 (0.1%)	31 (0.05%)
Mining and Quarrying	1 (0.1%)	94 (0.1%)
Activities of Householders as employers	4 (0.2%)	121 (0.2%)
Electricity, Gas, Steam and Air Conditioning Supply	14 (0.7%)	314 (0.5%)
Water Supply	24 (1.2%)	394 (0.6%)
Agriculture, Forestry and Fishing	13 (0.7%)	799 (1.2%)
Real Estate Activities	33 (1.7%)	1,194 (1.8%)
Accommodation and Food Service Activities	107 (5.4%)	2,762 (4.2%)
Public Administration and Defence	90 (4.5%)	2,948 (4.4%)
Information and Communication	70 (3.5%)	3,222 (4.9%)
Arts, Entertainment and Recreation	96 (4.8%)	3,616 (5.5%)
Administrative and Support Service Activities	102 (5.1%)	3,738 (5.6%)
Transport & Storage	95 (4.8%)	4,047 (6.1%)
Financial and Insurance Activities	77 (3.9%)	4,074 (6.1%)
Manufacturing	158 (7.9%)	5,031 (7.6%)
Construction	216 (10.9%)	5,081 (7.7%)

Professional, Scientific and Technical Activities	124 (6.2%)	5,506 (8.3%)
Education	217 (10.9%)	6,390 (9.6%)
Human Health and Social Activities Work	209 (10.5%)	6,742 (10.2%)
Wholesale & Retail Trade	337 (17.0%)	10,195 (15.4%)

5.18 Sixteen percent (16%) of those who are economically active in Upper Beeding work from home, higher than the average for the district or for England, as shown in the table below.

Location of work	Upper Beeding	Horsham	England
Less than 10km	35.5%	34.3%	52.3%
10km to less than 30km	27.2%	28.5%	21.0%
30km and over	10.2%	13.8%	8.0%
Work mainly at or from home	16.0%	14.6%	10.3%
Other	11.1%	8.7%	8.5%
Average distance travelled to work	19.2km	19km	14.9km

Source: Census 2001/11/ SHMA13/AECOM Housing Needs Survey 2017

5.19 A business needs survey was carried out in the parish in February/March 2015. In Upper Beeding a number of businesses were canvassed within the following locations: Edburton, Small Dole, Mackleys Industrial Estate, and Golding Barn. Out of the surveys delivered a total of 44 were returned giving a response rate of 57%. Trading was found to be predominantly local with 19 businesses trading nationally and 12 globally. Five businesses were run by a single person and 39 employed others, 1 business was looking to downsize whilst 19 wanted to expand with the remaining 20 staying the same.

## Housing

5.20 There are 1,576 households<sup>8</sup> located within the parish. Of these:

- 608 were owner-occupier households, owned outright (38.6% compared to 37.3% across the District)
- 626 were owner-occupier households, owned with a mortgage or loan (39.7% compared to 37.2% across the District).
- 4 were in Shared Ownership (0.3% compared to 0.7% across the District).
- 16 were Social Rented from Council (1.0% compared to 1.2% across the District).
- 110 were Social Rented Other (7.0% compared to 10.3% across the District).
- 196 were privately rented (12.4% compared to 11.8% across the District).
- 16 were Living Rent Free (1.0% compared to 1.5% across the District).

<sup>8</sup> \*A household is defined as one person living alone, or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room, sitting room or dining area. As defined by ONS (2014).

- 5.21 There are 1,627 dwellings<sup>9</sup> located within the parish. Of these:
- 447 households were living in Detached housing (27.5% compared to 38.6% across the District)
  - 550 households were living in Semi-detached housing (33.8% compared to 26.5% across the District)
  - 398 households were living in Terraced housing (24.5% compared to 17.0% across the District)
  - 185 households were living in Flats/apartments (11.4% compared to 17.2% across the District)
  - 47 households were living in Caravans or other Mobile or Temporary Structures (2.9% compared to 0.7% across the District).
- 5.22 The Housing Needs Survey undertaken for Upper Beeding Parish Council by AECOM in 2017 estimated the quantity of housing needed in Neighbourhood Plan area being derived from four different sources; these being,
1. Horsham District Planning Framework 'settlement hierarchy' minimum derived figure (HDPF) 2011-31, which generates a projection of **69 dwellings** over the plan period or 5 dwellings per annum (rounded);
  2. Horsham District Planning Framework 'district' minimum derived figure (HDPF) 2011-31, which generates a projection of **446 dwellings** over the plan period or 32 homes per year (rounded);
  3. Housing Need in Horsham 2015 (SHMA) –a proportional share drawn from OAN produces a final target of **351 dwellings** over the plan period, or 25 per year (rounded);
  4. DCLG Household projections generate a re-based projection of **366, or 26 dwellings** (rounded) over the plan period; and
  5. A projection derived from homes growth between 2001 and 2016 (based on Census and Horsham District Council figures) of **64 homes** over the plan period.

---

<sup>9</sup> \*A dwelling is a unit of accommodation with all rooms, including kitchen, bathroom and toilet behind a door that only that household can use. As defined by ONS (2014).

5.23 The study also found that:

<b>Affordable Housing</b>	<p>The current tenure profile of the area (dominated by owner occupation) leaves little suitable accommodation for those on low incomes. Roughly 8% of households in 2014 were eligible for affordable housing; this is also the proportion of the housing stock defined as AH.</p> <p>The small growth in shared ownership dwellings at the level of the HMA, a crisis of affordability is identified, with households on lower and median incomes unable to access affordable market housing (AMH). Households on mean and median incomes within Horsham District are unable to afford entry-level properties.</p>
<b>Demand/need for smaller housing</b>	<p>The current housing stock exhibits a strong bias towards larger dwellings, and relatively few flats. Changes in the profile of the housing stock saw an increase in larger family dwellings and households occupying homes consisting of three rooms.</p> <p>Data from housing transactions reveals house prices for smaller dwelling types, such as terraced dwellings and flats has increased more strongly than for detached and semi-detached properties</p>
<b>Demographic change</b>	A substantial increase in the numbers of older people is recorded, and this is forecast to continue
<b>Family sized housing</b>	Other changes in age structure reinforce the impression of a family orientated community, as well as a place of retirement.
<b>Employment Trends</b>	<p>Upper Beeding has been shown to be connected to the wider economic area, and therefore demand for housing will be stimulated by economic growth in the Brighton and Hove and Wider Coast to Capital Economic Area.</p> <p>Furthermore, Upper Beeding has been shown to have a significant degree of home workers, a sector which has high potential for future growth as noted in the Horsham District Economic Profile 2016.</p>
<b>Housing transactions (Prices)</b>	The Upper Beeding NPA has been shown to have experienced a 34% increase in prices paid over a ten year period, with larger increases for smaller, more affordable properties such as terraces.
<b>Housing Transactions (Volume)</b>	<p>The volume of sales in Upper Beeding has been shown to be more resilient to the effects of the double dip national recession than the rest of the housing market area, demonstrating the ongoing demand for housing in the NPA.</p> <p>Furthermore, the proportion of all properties sold in Upper Beeding that fall into each type matches how these types are represented in the existing stock, except for flats and terraces, where a higher number has been sold, suggesting these types are in particularly high demand.</p>
<b>Migration</b>	Migration is not seen as significant factor in determining housing need given that the just 29% of the 6% of Upper Beeding residents born outside of the UK arrived in the last 10 years
<b>Overcrowding</b>	There is some evidence of over-crowding in Upper Beeding, however this are not seen as particularly significant indicator of additional demand.
<b>Concealment</b>	Upper Beeding's rate of concealed families (1.4%) is higher than that of Horsham District as a whole (1.3%) indicating some level of demand.
<b>Rate of development</b>	<p>The local authorities in the wider North West Sussex Housing Market Area have significantly under-delivered against HMA targets over the past eight years.</p> <p>Furthermore, the rate of development in Upper Beeding increased sharply in 2015/16. This suggests the period of under-delivery prior to this year had created a latent demand; the development exhibited in 2015/16 is evidence of the market responding to this demand as the national economy recovers.</p>

5.24 Property prices within Upper Beeding are outlined below. By employing a multiple of 3.5 household income, it can be estimated the level of the necessary income needed to afford dwellings at these prices.

Property Type	Location	Lowest Price	Gross Income Required
<b>1 bed studio flat</b>	Upper Beeding	£112,500	£29,928
<b>2 bed semi-detached house</b>	Upper Beeding	£242,000	£62,228
<b>2 bed terraced house</b>	Upper Beeding	£280,000	£72,000
<b>3 bed detached bungalow</b>	Upper Beeding	£300,000	£77,142
<b>3 bed semi-detached house</b>	Upper Beeding	£325,000	£83,571
<b>4 bed detached house</b>	Upper Beeding	£435,000	£111,857

Source: [rightmove.co.uk/AECOM Housing Needs Survey 2017](http://rightmove.co.uk/AECOM)

## Transport

5.25 Upper Beeding has grown from a small farming community with some through traffic, to a residential area generating its own traffic. The development of the road network has never kept pace with this growth, and is limited by the river/floodplains, which restrict the number of roads in and out of the village. Many of the roads, even in the more recently developed areas, are only wide enough for two vehicles to pass, and consequently local on-road parking generates considerable friction. The hourly bus service to Shoreham and Brighton provides an essential link to major shopping areas and the railway network. The services to Worthing, Henfield, Burgess Hill and Horsham are also essential links. The nearest railway station is Shoreham by Sea (4.5 miles away).

5.26 Of the 1,576 households:

- 141 households had no car or van (8.9% compared to 11.8% across the District and 25.8% across England)
- 615 households had 1 car or van (39.0% compared to 39.6% across the District and 42.2% across England)
- 572 households had 2 cars or vans (36.3% compared to 35.5% across the District and 24.7% across England)
- 161 households had 3 cars or vans (10.2% compared to 9.1% across the District and 5.5% across England)
- 87 households had 4 or more cars or vans (5.5% compared to 4.0% across the District and 1.9% across England)

## Health

5.27 Of the 3,763 usual residents of the parish were classified as having the following health status:

- 1,838 were in Very Good health (48.8% compared to 50.6% across the District)
- 1,348 were in Good health (36.8% compared to 34.8% across the District)
- 439 were in Fair health (35.8% compared to 11.1% across the District)
- 105 were in Bad health (2.8% compared to 2.7% across the District)
- 33 were in Very Bad health (0.9% compared to 0.8% across the District).

## Nature Conservation

5.28 The South Downs National Park covers approximately two thirds of the parish's land area, primarily consisting of a zone to the east of the A2037 road. The southern half of the parish is located within the South Downs Environmentally Sensitive Area.

5.29 There are:

- 4 Sites of Special Scientific Interest exist within the parish:
  - 1 site - Horton Clay Pit SSSI <sup>10</sup>
  - 3 sites associated with Beeding Hill to Newtimber Hill SSSI<sup>11</sup>
- Tottington Wood Local Nature Reserve is located within the parish and is designated as Ancient Woodland

5.30 The parish contains areas identified by Natural England as Priority Habitats and are subject to Habitat Action Plans:

*Lowland Calcareous Grassland Habitat* – 3 main areas primarily centred on the South Downs escarpment, 2 zones north of the South Downs way and 1 east of Lockburn Cottages.

*Undetermined Grassland Priority Habitat* – primarily covering the same zones as those outlined above for Lowland Calcareous Grassland Habitat.

<sup>10</sup>

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1000590&SiteName=Orton&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=>

<sup>11</sup>

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1000374&SiteName=&countyCode=46&responsiblePerson=&SeaArea=&IFCAArea=>

*Fens Priority Habitat* – 3 zones. 1 zone surrounding Anchor Bottom in the south west corner of the parish. 1 zone running along the north face of Beeding Hill. 1 zone running along the north face of Truleigh Hill.

*Lowland Meadows Priority Habitat* – a small zone located south of Edburton.

*Coastal and Floodplain Grazing Marsh Priority Habitat* – multiple contiguous zones located directly north of the village of Upper Beeding, extending northwards to the River Adur and eastwards as far as Horton Hall Farm.

*Deciduous Woodland Priority Habitat* – Numerous small parcels of land located to the north of the South Downs Way along the edge of the escarpment. Significant parcels of land are located at North Furze Field and South Furze Field, Flacketts Wood, Tottington Wood, Longlands Wood, around Hillside Park, Horton Wood and Hoe Wood.

5.31 The following areas are subject to an Environmental Stewardship Agreement:

- Entry Level Stewardship Scheme – A single area east of the A2037 at the Industrial Estate, covering Flacketts Wood and the surrounding area.
- Entry Level plus Higher Level Stewardship Scheme – This covers approximately 80% of the parishes land area, with the primary exclusions being the built up areas of Upper Beeding, Small Dole, the Landfill Site and around the South Camp and Tottington Wood east of the A2037 road.

5.32 The following areas are in Woodland Grant Scheme 1:

- 1 site (Silverstone) on the eastern edge of the parish at Edburton adjacent to the School Cottages.

The following areas are in Woodland Grant Scheme 2:

- Southdown Caravan Park Field – located at Golding Barn.
- Tottington Woods – located south of Sands Lane.

The following areas are in Woodland Grant Scheme 3:

- Nettledown Cottage – located in the north east corner of the parish.
- Tottington/Longlands Wood – located to the east of Hillside Scout Camp.

## Heritage

5.33 The English Heritage classification of Listed Buildings shows that the Parish of Upper Beeding contains the following Listed buildings and structures including:

- HOBJOINS, HYDE STREET, Upper Beeding, West Sussex II
- HOBJOINS COTTAGES, 1 AND 2, HYDE STREET, Upper Beeding, West Sussex II
- OAK COTTAGE, HYDE STREET, Upper Beeding, West Sussex II
- OLD PLACE, HYDE STREET, Upper Beeding, West Sussex II

- THE OLD HOUSE, HYDE STREET, Upper Beeding, West Sussex II
- NIGHTINGALES, HENFIELD ROAD, Upper Beeding, West Sussex II
- BURRELLS FARMHOUSE, HENFIELD ROAD, Upper Beeding, West Sussex II
- BEEDING COURT FARMHOUSE, SHOREHAM RD, Upper Beeding, West Sussex II
- MICHAELMUS COTTAGE, EDBURTON ROAD, Upper Beeding, West Sussex II
- TOTTINGTON MANOR, EDBURTON ROAD, Upper Beeding, West Sussex II
- THE TOWERS CONVENT, HENFIELD ROAD, Upper Beeding, West Sussex II
- THE BURROWS, HENFIELD ROAD, Upper Beeding, West Sussex II
- STARLINGS, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- 1725 COTTAGES, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- THE GARDEN WALL OF POND FARMHOUSE TO THE EAST OF THE HOUSE, HIGH STREET, Upper Beeding, West Sussex II
- THE KINGS HEAD INN, HIGH STREET, Upper Beeding, West Sussex II
- THE BRIDGE INN, HIGH STREET, Upper Beeding, West Sussex II
- THE PRIORY, CHURCH LANE, Upper Beeding, West Sussex II
- SEPTEMBER COTTAGE, EDBURTON ROAD, Upper Beeding, West Sussex II
- TRULEIGH MANOR FARMHOUSE, EDBURTON RD, Upper Beeding, West Sussex II
- EDBURTON HOUSE, EDBURTON VILLAGE, Upper Beeding, West Sussex II
- VALERIE MANOR, HENFIELD ROAD, Upper Beeding, West Sussex II
- BEAM ENDS, HIGH STREET, Upper Beeding, West Sussex II
- POND FARMHOUSE, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- OLD BARN W. OF POND FARMHOUSE, HIGH ST. Upper Beeding, West Sussex II
- POUND HOUSE COTTAGE, POUND LANE, Upper Beeding, Horsham, West Sussex II
- GLENDALE, HIGH STREET, Upper Beeding, West Sussex II
- FERNDALE HIGH STREET, Upper Beeding, West Sussex II
- MANOR COTTAGE, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- THE DILLY, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- TALL CHIMNEYS, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- ABURTON FARMHOUSE, EDBURTON ROAD, Upper Beeding, West Sussex II
- THE MANOR HOUSE, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- HOLLY COTTAGE, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- CANDYTUFT, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- PHARMACY, HIGH STREET, Upper Beeding, Horsham, West Sussex II
- SHALON, HYDE STREET, Upper Beeding, Horsham, West Sussex II
- HORTON FARMHOUSE, HENFIELD RD, Upper Beeding, West Sussex II
- PARISH CHURCH OF ST PETER, CHURCH LANE, Upper Beeding, West Sussex II\*
- CHURCH OF ST ANDREW, EDBURTON VILLAGE, Upper Beeding, West Sussex II\*

#### 5.34 Scheduled Monuments:

- Group of salterns north of St Peter's Church Scheduling Upper Beeding, West Sussex
- Saltern in Saltings Field, 220m N of Beeding Bridge Scheduling Upper Beeding, W Sussex
- Cross dyke on Beeding Hill, 1100m north west of New Erringham Farm Cottages Scheduling Upper Beeding, Horsham, West Sussex
- Cross dyke on Tottington Mount, 550m south east of Tottington Manor Farm Scheduling Upper Beeding, Horsham, West Sussex
- Round barrow S of Edburton Scheduling Upper Beeding, Horsham, West Sussex

- Bowl barrow on Edburton Hill, 380m west of the motte and bailey castle Scheduling Upper Beeding, Horsham, West Sussex
- Martin Down style enclosure, bowl barrow, Iron Age hillfort,
- Romano-British village and associated field system on Thundersbarrow Hill Scheduling Adur, West Sussex

5.35 There are two Conservation Areas in Upper Beeding: High Street and Hyde Street.

### **Landscape**

5.36 Designated for its national importance in terms of landscape and scenic quality, sections of the South Downs National Park fall within the parish. The parish is covered by two landscape character areas – a) Henfield and Small Dole Farmlands and b) Lower Adur Valley. In the case of a) it is of moderate sensitivity to change due to the high visibility and intrinsic landscape qualities. In the case of b) it is of high sensitivity to change due to the visibility of the floodplain/valley sides and its intrinsic landscape qualities.

### **Flooding**

5.37 The Environment Agency highlighted the following constraints:

- Land within Flood Zones 3 (high probability e.g. 1 in 100 or greater risk of flooding in any year), 2 (medium probability), associated with the flood risks from the River Adur and Woods Mill Stream. The majority of the existing developed land is in Flood Zone 1 which has a low probability of flooding. The ecological value of these watercourses and their adjacent land is also an environmental consideration.
- Source Protection Zone 1 (sensitive inner zone), 2 (outer zone) and 3 (total catchment area). These are designated to protect individual groundwater sources for public water supply. Of most significance is the Southern Water abstraction near Castle Town.

### **Soil/Air and Climate**

5.38 Information on energy use and air quality has been taken from the SA Scoping Report for the HDPF Sustainability Appraisal November 2015.

5.39 The earth itself is an important asset to the Horsham District, both in terms of agriculture and the raw materials it contains. The District contains deposits of sand, gravel and clay, and some of these areas are being actively extracted today.

- 5.40 Industrial uses and other activities (e.g. landfill) that have taken place in the District have the potential to result in contaminated land. For example, raw materials, chemicals used in manufacture and waste deposits can result in pollutants entering the soil. In certain conditions these pollutants may have a pathway where they can reach and harm humans, livestock or the natural environment. The Council has a Contaminated Land Inspection Strategy which sets out how it will identify areas of land that may be contaminated. Sites in the District which may have or have had the potential to result in contaminated land include the following: landfill sites, gasworks, sewage works, petrol stations, certain activities and sites on industrial estates of business parks, former foundries, tanneries, lime, cement and plaster works.
- 5.41 The soil is also an important agricultural resource providing land for arable crops, grazing pasture and forestry land. The heavy clay soils present in much of the District mean that much of the land is not of particularly high quality for agriculture, but there are some areas particularly on the lighter sandier soils near Henfield and West Chiltoningon, where conditions are better for agriculture
- 5.42 Air quality monitoring data collected as part of the Council's activities has identified a number of areas in the District where air quality is poor. Both Cowfold and Storrington were found to have levels of nitrogen dioxide (NO<sub>2</sub>) that exceed legal limits. There is no reference to areas within Upper Beeding parish.
- 5.43 A table setting out the key baseline information and linking this with trends/topics is set out below. The Parish Council is mindful that it is very difficult in most cases to measure impacts at this local scale as either the data is not reported at this scale and/or the impact is so relatively negligible that it cannot be measured. In which case, the SA/SEA framework will be used to inform judgements on the impact of the proposed policies in relation to any reasonable alternatives there may be.

## Upper Beeding Neighbourhood Plan SEA/SA: Linking Baseline Information and Trends

Title	Source	Data	Trends and consequences
<b>Settlements and Historic Landscape</b>			
<b>Settlement Hierarchy and Sustainability</b>	<p>HDPF - Policy 3 Strategic Policy: Development Hierarchy</p> <p>Horsham District Council - Settlement Sustainability Review 2014</p> <p>South Downs Local Plan 2018 Submission version Core Policy SD1: Sustainable Development</p>	<p>The two largest settlements, Upper Beeding has together with Bramber been identified as a '<i>Small Town/Larger Village</i>' and Small Dole, has been identified as a 'Smaller Village' in the HDPF. This is due to their level of services and accessibility and their reliance on other villages and towns to meet their needs. Both settlements have built-up area boundaries.</p> <p>The HDC Settlement Sustainability Review states that Upper Beeding has limited employment opportunities within the village although there are some nearby industrial estates. There are strong employment links with the south coast towns of Brighton and Worthing which is the main employment destination for residents in the village. Upper Beeding has a good range of community facilities including a primary school, village hall (shared with Bramber), recreation ground, sports hall and church halls, allotments and a branch surgery of Steyning Health Centre. There is also a good range of local shops including a convenience store, hair dressers and well as some more specialist outlets. Other services and facilities including a wider range of retail outlets, leisure centre and secondary school are located in nearby Steyning – there is a ½ hourly to hourly bus service. Upper Beeding has a very high quality environment adjoining the South Downs National Park and Conservation Areas.</p>	<p>Due to the rural character of the parish, it is important to keep the settlements' character. The UBNP may allocate sites for development within or adjoining the villages of Upper Beeding and Small Dole but these are likely to only be of a small scale in line with their proposed position in the settlement hierarchy.</p> <p>The village centre provides for some local services and future development should be within walking distance or easily accessible to these facilities. The high quality of the landscape and environment is a key issue. The village is connected to the wider area by bus links but there is no railway.</p>
<b>Listed Buildings &amp; Conservation Areas</b>	HDPF - Heritage Assets and Managing Change within the Historic Environment - Policy 34	<p>In Upper Beeding there are 38 Grade II listed buildings and two Grade II* listed buildings - the parish church of St Peter, Church Lane and the Church of St Andrews, Edburton village. There are two conservation areas in Upper Beeding.</p> <p>There are 7 Scheduled Monuments but no registered Parks and Gardens.</p>	The parish has a number of listed buildings and Scheduled Ancient Monuments and two Conservation Areas and therefore needs to ensure that any new development is sensitive to the character of those heritage assets and their settings. Understanding the cultural heritage of the parish is important as it guides settlement patterns and influences decisions about the design and materials used in development.

		In Small Dole there are 6 listed buildings, of which all are Grade II. There are 7 Scheduled Monuments but no registered Parks and Gardens. Furthermore, the parish Church of St. Peter is identified on the 'Heritage at Risk' register.	The historic environment also has a key role to play in the local economy.  These will be key considerations in the allocation of sites and Neighbourhood Plan policies.
<b>Biodiversity &amp; Environment</b>			
<b>Nature Conservation and Habitats</b>	<p>HDPF - Green Infrastructure and Biodiversity - Policy 31</p> <p>Habitats Regulations Assessment of the Horsham District Planning Framework 2014</p> <p>Sussex Biodiversity Action Plan</p> <p>UBNP Environmental &amp; Countryside Focus Team document 2016</p> <p>South Downs Local Plan 2018 Submission version Strategic Policy SD9: Biodiversity and Geodiversity</p>	<p>The South Downs National Park covers approximately 2/3 of the parish's land area, primarily consisting of a zone to the east of the A2037 road.</p> <p>There are 4 Sites of Special Scientific Interest, 1 site called Horton Clay Pit SSSI and 3 sites belonging to Beeding Hill to Newtimber Hill SSSI. There is one Local Nature Reserves called Tottington Wood Local Nature Reserve (LNR).</p> <p>The parish contains areas identified by Natural England as Priority Habitats and are subject to Habitat Action Plans, such as; Lowland Calcareous Grassland Habitat, Undetermined Grassland Priority Habitat, Fens Priority Habitat, Coastal and Floodplain Grazing Marsh Priority Habitat, Lowland Meadows Priority Habitat and numerous sites of Deciduous Woodland Priority Habitat.</p> <p>There are areas subject to Environmental Stewardship Agreement and Schemes. There are Woodland Grant Scheme 1, 2 and 3 areas in the parish.</p>	<p>Development has the potential to harm biodiversity both directly and indirectly. Direct effects include loss of land to new development, whereas indirect effects include increased traffic resulting in a decline in air quality, which can impact habitats and species some distance from a development site. Development does however have potential to create places for biodiversity. Development proposals should seek to enhance biodiversity through a range of measures, including enhancements either on or off the site<sup>12</sup>.</p> <p>With Upper Beeding containing many areas of nature conservation interest and protection, policies in the Neighbourhood Plan will need to focus on retaining and enhancing these valuable assets. Sites allocated for development in particular will need to be appraised according to their impact on nature conservation.</p>

<sup>12</sup> Horsham District Planning Framework Chapter 9 extracts

<b>Landscape</b>	<p>HDPF – Protected Landscapes Policy 30</p> <p>South Downs Local Plan 2018 Submission version Strategic Policy SD4: Landscape Character Strategic Policy SD6: Safeguarding Views</p> <p>SDNPA (2011) South Downs Integrated Landscape Character Assessment</p> <p>Landscape Capacity Assessment Report 2014</p>	<p>Designated for its national importance in terms of landscape and scenic quality, sections of the South Downs National Park fall within the parish.</p> <p>The parish is covered by two landscape character areas – a) Henfield and Small Dole Farmlands and b) Lower Adur Valley. In the case of a) it is of moderate sensitivity to change due to the high visibility and intrinsic landscape qualities. In the case of b) it is of high sensitivity to change due to the visibility of the floodplain/valley sides and its intrinsic landscape qualities.</p>	<p>Development has the potential to harm protected landscapes. Major development will not normally be permitted. However, there may be cases where small scale development that helps to maintain economic or social well-being in or adjoining the protected landscapes may be necessary. Development close to the edge of the South Downs National Park has the potential to have adverse impacts on the qualities of these landscapes.</p> <p>Policies within the Neighbourhood Plan will need to consider the natural beauty and public enjoyment of the South Downs National Park. Consideration will need to be given to allocating sites close to the protected landscape to ensure that there will be no adverse impacts.</p>
<b>Flooding</b>			
<b>Fluvial Flooding</b>	<p>HDPF – Flooding Policy 38</p> <p>Strategic Flood Risk Assessment 2007, 2010 and 2014</p> <p>SDNPA (2015) Water Cycle Study and Strategic Flood Risk Assessment</p> <p>Environment Agency map</p>	<p>The Environment Agency in their response to the original scoping report highlighted the following constraints:</p> <ul style="list-style-type: none"> <li>• Land within Flood Zones 3 and 2, associated with the flood risks from the River Adur and Woods Mill Stream. The ecological value of these watercourses and their adjacent land is also an environmental consideration.</li> <li>• Source Protection Zone 1, 2 and 3. These are designated to protect individual groundwater sources for public water supply. Of most significance is the Southern Water abstraction near Castle Town.</li> </ul>	<p>Assessment of sites to be allocated in the Neighbourhood Plan will need to ensure priority is given to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. This includes avoiding the functional floodplain (Flood zone 3b) except for water-compatible uses and essential infrastructure.</p>

<b>Surface Water Flooding</b>	Environment Agency map	There are some small areas spread out across the parish that are susceptible to surface water flooding.	New development in areas particularly susceptible to surface water flooding will need to effectively demonstrate they can mitigate the risk of flooding without having adverse effects on surrounding areas.
<b>Infrastructure</b>			
<b>General</b>	<p>HDPF - Infrastructure Provision - Policy 39</p> <p>Gatwick Sub Region Outline Water Cycle Study 2011</p> <p>SDNPA (2015) Water Cycle Study and Strategic Flood Risk Assessment</p> <p>UBNP Community and Infrastructure focus group report 2015</p>	<p>Developers working in conjunction with the Council and service providers should demonstrate that there is adequate capacity both on site and off site to serve the development and that it would not lead to problems for existing users. Studies to determine whether the proposed development will lead to overloading of existing infrastructure may be required to support planning applications. Infrastructure constraints for development include water quality, water resource availability, flooding, wastewater treatment quality, sewer network and drainage and water supply.</p>	<p>Specific information has not been gathered for Upper Beeding in terms of water but these will need to be considered in consultation with the relevant authorities as part of the site assessment work.</p>
<b>Green Infrastructure</b>	<p>HDPF – Green Infrastructure and Biodiversity – Policy 31</p> <p>Green Infrastructure Strategy 2014</p> <p>UBNP Local Green Space 2016</p> <p>SDNPA (2013) Access Network and Accessible</p>	<p>The Parish Council has identified several areas they wish to designate as local green space and these are set out in the Local Green Space report 2017. These include:</p> <ul style="list-style-type: none"> <li>• Hyde Street Green, BN44 3TT</li> <li>• Pepperscombe Lane, BN44 3HS</li> <li>• Part of Priory Fields Green, BN44 3HU</li> <li>• St Peter’s Green &amp; floodplain, BN44 3HX</li> <li>• Saltings Field, BN44 3JH</li> <li>• Small Dole Playground, BN5 9XE</li> </ul>	<p>Green Infrastructure is a term used to describe a multi-functional and connected network of green spaces, water and other environmental features in urban and rural areas. It includes trees, parks, road verges, allotments, cemeteries, woodlands, rivers and wetlands. Green Infrastructure can contribute to the provision of 'ecosystem services'. The network of Green Infrastructure within the district must be maintained and enhanced. The Neighbourhood Plan will need to consider how development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss and</p>

	<p>Natural Greenspace Study</p> <p>South Downs Local Plan 2018 Submission version Strategic Policy SD45: Green Infrastructure</p>		<p>ensures that the ecosystem services of the area are retained.</p>
<p><b>Community Infrastructure</b></p>	<p>UBNP Community and Infrastructure Focus Group report 2015</p> <p>South Downs Local Plan 2018 Submission version Development Management Policy SD43: New and Existing Community Facilities</p> <p>The Sport Open Space and Recreation study 2014</p> <p>HDPF - Community Facilities, Leisure and Recreation - Policy 43</p>	<p>The area has satisfactory nursery and pre-school provision with providers competing for clients. There are just enough primary school places for Beeding and Small Dole children at present at the community maintained Primary School. However, with further housing development and increased numbers of children expected, the school would quickly reach capacity. In addition, as Upper Beeding Primary School has established a good reputation an increasing number of Steyning families have placed their children in Beeding. Some restriction on such arrangements might be necessary if the number of children in Beeding were to increase substantially. There is only one Doctor's practice in Upper Beeding. It is an outpost of the Steyning Health Centre (SHC) practice and is located in an adapted bungalow in Dawn Close. Provision is limited and, on many occasions, residents have to travel to the SHC. Whilst the bus goes quite close to the SHC, access is not easy for older residents.</p> <p>There is already an extensive network of social and leisure groups functioning in the community. (See list below) The existing facilities for sports and similar activities are however limited. Indoor activities are restricted to the Sports Hall and the Village Hall, both of which restrict the variety of activities possible. The Memorial Playing Field enables the Cricket and Football clubs to function but their space is limited and the current social areas connected with the field (changing rooms etc) are woefully inadequate.</p>	<p>Communities will only be sustainable if they are fully inclusive and deliver the necessary standards of services and facilities. This policy seeks to retain and enhance existing facilities and services and ensure that new facilities are provided at an appropriate level of provision where a need is identified. The Neighbourhood Plan should seek to assess the needs of the community and consider options for the retention and improvement of facilities as well as ensure the existing ones are not lost through development.</p>

		Facilities are listed in the UBNP Community and Infrastructure Focus Group report 2015.	
<b>Accessibility</b>			
<b>Transport Footpaths</b>	<p>Horsham Transport and Development Study 2014</p> <p>UBNP Community and Infrastructure Focus Group report 2015</p> <p>HDPF - Inclusive Communities – 42</p> <p>South Downs Local Plan 2018 Submission version</p> <p>Development Strategic Policy SD19: Transport and Accessibility</p> <p>Strategic Policy SD20: Walking, Cycling and Equestrian Routes</p>	<p>Upper Beeding has grown from a small farming community with some through traffic, to a residential area generating its own traffic. The development of the road network has never kept pace with this growth, and is limited by the river/floodplains, which restrict the number of roads in and out of the village. Many of the roads, even in the more recently developed areas, are only wide enough for two vehicles to pass, and consequently local on-road parking generates considerable friction. Vehicles are frequently parked partly on pavements creating real difficulties for pedestrians. In common with many other rural communities, the bus services are under threat as subsidies are reduced. The hourly bus service to Shoreham and Brighton provides an essential link to major shopping areas and the railway network. The services to Worthing, Henfield, Burgess Hill and Horsham are also essential links.</p>	<p>Access to health care facilities can be difficult for rural residents, particularly where there is limited access to a car. It is important that development should contribute towards meeting the needs of all sections of the community and help to encourage social cohesion. The Neighbourhood Plan would need to consider the location of development in terms of accessibility to facilities and transport links as well as improvements to footpaths and infrastructure to allow better access to services.</p>
<b>Housing</b>			
<b>Housing Need</b>	<p>Affordable housing needs model update 2014</p> <p>Housing Need in Horsham District 2015</p> <p>SDNPA Strategic Housing Market Assessment 2015</p>	<p>With the Brighton postcode being attractive to house seekers coming from Brighton and London, the cost of housing has risen to levels that make it increasingly difficult for young people and especially families to set up home independently and remain in the parish. With 50 homes being second homes and may not be released on the open market, every opportunity to release housing stock is being considered before any further development is considered. Some of the families born or brought up in the Parish would like to stay to support and provide care to elderly relatives but data shows they are forced to move away due to lack of housing.</p>	<p>Background research for the NP has provided useful evidence of the local housing needs in Upper Beeding. The Neighbourhood Plan will need to carefully consider the right mix of development to include a variety of housing sizes, types and tenures to meet the needs of the local community. Other matters such as location and accessibility as well as design and layout will need to be assessed.</p>

	<p>HDPF Meeting Local Housing Needs - Policy 16</p> <p>South Downs Local Plan 2018 Submission version Strategic Policy SD26: Supply of Homes Strategic Policy SD27: Mix of Homes Strategic Policy SD28: Affordable Homes</p> <p>UBNP Housing and Development Focus Group report 2015</p>	<p>Within the parish, from 2001 – 2011 there has been an increase in the 75 years+ by 134. There is only 1 local care home with 22 places (Adur View under construction) and a housing complex for the elderly. A housing needs survey carried out in 2014 for the NP found that there is a good level of support for affordable housing to meet local needs and limited support for market housing. The respective need / demand for housing reflects this with a substantial need for affordable housing identified and a modest demand for market housing. We need to identify sites to meet both the reasonable need for genuinely affordable housing and the modest need for downsizing housing.</p>	
--	--	---	--

## 6. PLANS AND PROGRAMMES

- 6.1 As well as the key environmental, social and economic issues that affect the plan the baseline for the Sustainability Appraisal also requires an understanding of the policies and plans that influence the area and which the Neighbourhood Plan must operate within. It must have regard to the National Planning Policy Framework (NPPF 2018), contribute to the achievement of sustainable development and be in general conformity with strategic policies in the relevant Development Plan.
- 6.2 This section of the Sustainability Appraisal highlights the relevant national policy and guidance that should influence the Neighbourhood Plan for Upper Beeding. It also identifies local planning documents that the Plan needs to conform with and that will also influence the Neighbourhood Plan area. Neighbourhood Plans form the bottom tier of the planning system and so are influenced by various higher-level plans, policies and guidance.
- 6.3 The Neighbourhood Plan together with the relevant local plans for the area and the NPPF will be used to determine planning applications once the Neighbourhood Plan is made. The Horsham District Planning Framework is the relevant local plan for the area outside the National Park. The current plan for land within the National Park is the saved policies from the Horsham Core Strategy (2007) until a Local Plan is adopted for the South Downs National Park (programmed for spring 2019). **Appendix C** provides a list of the relevant plans.
- 6.4 The National Planning Policy Framework (NPPF) published by the Government in 2018 (an updated version to the original 2012 version) is an important guide in the preparation of local plans and Neighbourhood Plans. The UBNP must demonstrate that it is consistent with the provisions of the NPPF. The following paragraphs of the NPPF are especially relevant to the UBNP:
- Presumption in favour of sustainable development (paragraph 11)
  - Identifying land for homes (paragraph 69)
  - Supporting a prosperous rural economy (paragraph 83)
  - Promoting healthy and safe communities (paragraph 92)
  - Open space and recreation (paragraph 96)
  - Local Green Spaces (paragraph 99)
  - Achieving well-designed places (paragraph 127)

- Conserving and enhancing the natural environment (paragraph 170)

The Basic Conditions Statement sets out how the NP complies with both the 2012 and 2018 NPPFs.

- 6.5 On 27 November 2015 Horsham District Council adopted the Horsham District Planning Framework (HDPF). With the exception of land within the South Downs National Park, the HDPF replaces the policies contained in the Horsham District Core Strategy and General Development Control Policies which were both adopted in 2007. The HDPF sets out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs for the district (outside the South Downs National Park). The Core Strategy and General Development Control Policies will remain the adopted Development Plan Documents (DPDs) for the South Downs National Park until the adoption of their own Local Plan.
- 6.6 The HDPF identifies Upper Beeding together with Bramber as a ‘Small Town/Larger Village’ and Small Dole, has been identified as a ‘Smaller Village’. The Plan contains a series of other policies seeking to promote housing and economic growth as well as conserve and protect the many natural and built heritage designations in the District, including the setting of the South Downs National Park and international biodiversity value sites.
- 6.7 The adopted HDPF identifies a clear role for Neighbourhood Planning in the district in contributing to meeting local housing need. The HDPF “seeks to be relevant and unique and meet the objectively identified needs of Horsham District”. It also sets the scene and allows for communities to “develop their own, more detailed, local Neighbourhood Plans to meet the needs of their community as they see fit and has regard to the wider area beyond the District boundary” (para 3.15).
- 6.8 It states that “villages have the potential to address identified local needs and limited development should be pursued to meet these needs and support rural services and infrastructure. However, a balance needs to be struck between environmental constraints and fundamentally altering local character ... in the future the needs of local areas can be met, hopefully building on this existing work through the new Neighbourhood Planning system” (para 3.24).
- 6.9 The document contains a number of strategic and development management policies for the UBNP to consider.

6.10 The policies below are some of the most relevant to Upper Beeding SA and the Neighbourhood Plan.

**Policy 2 Strategic Development** – establishing the key principles for all development in the District, including how development around the edges of existing rural settlements should be managed

**Policy 3 Development Hierarchy** – defining the position of all settlements in the District into a hierarchy based on their population and services;

**Policy 4 Settlement Expansion** – providing for the growth of settlements to meeting identified local housing, employment and community needs

**Policy 9 Employment Development** – protecting existing employment sites and encouraging their appropriate expansion

**Policy 10 Rural Economic Development** – encouraging development to promote local employment opportunities

**Policy 12 Vitality & Viability of Existing Retail Centres**

**Policy 13 Town Centre Uses** - managing the mix of village centre uses

**Policy 15 Housing Provision** – requiring Neighbourhood Plans to make provision in total for 1,500 new homes in the plan period, reflecting the position of settlements in the hierarchy of Policy

**Policy 25 District Character and the Natural Environment** – protecting the landscape, landform and development pattern of the District.

**Policy 26 Countryside Protection** – protecting the rural character of the countryside beyond defined settlement boundaries

**Policy 27 Settlement Coalescence** – preventing development that will lead to the coalescence of settlements

**Policy 30 Protected Landscapes** – identifying the setting of the South Downs National Park

**Policy 32 Quality of New Development** – ensuring development schemes understand and respond to their context

**Policy 34 Heritage Assets and Managing Change within the Historic Environment** – managing development affecting heritage assets like Conservation Areas and Listed Buildings

**Policy 39 Infrastructure Provision** – ensuring that development schemes can be accommodated by the local infrastructure and contribute to improvements where necessary to ensure the proper planning of the area.

6.11 Horsham District Council is reviewing its Local Plan, the Horsham District Planning Framework (HDPF). As part of the first review stage, the Council published an Issues and Options document relating to Employment, Tourism and Sustainable Rural Development for a seven week period of consultation between 6 April 2018 and 25 May 2018. The document sets out key issues that have been identified and the suggested policy options to address them. It considers the strategy for economic development in the District; both the locational strategy for economic growth and sites which may have the potential for allocation for

employment use. It also considers how the Council can achieve sustainable development in the more rural parts of the district<sup>13</sup>.

## South Downs Local Plan

6.12 The South Downs was established as a National Park in 2010 and The South Downs National Park Authority became the local planning authority for the National Park in 2011. The South Downs Local Plan is the first Local Plan for the National Park as a single entity. On adoption, this plan will become the statutory development plan for the whole National Park, along with the minerals and waste plans and 'made' (adopted) Neighbourhood Development Plans. The Local Plan sets the policies against which planning applications will be considered and allocates land for a variety of uses. It will replace the existing planning policies operating across the South Downs National Park. In April 2018, the South Downs Local Plan was submitted to the Government for examination<sup>14</sup>. The Examination is taking place during November and December 2018. Alongside Strategic Site Policy SD56 Shoreham Cement Works, the following policies in the South Downs Local Plan are relevant to Upper Beeding:

### **Core Policy SD1: Sustainable Development**

Local planning authorities should positively seek opportunities to meet the development needs of their area. The National Park purposes are i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

### **Strategic Policy SD4: Landscape Character**

Development proposals will only be permitted where they conserve and enhance landscape character.

### **Strategic Policy SD5: Design**

Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area

### **Strategic Policy SD6: Safeguarding Views**

Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views and views of key landmarks within the National Park

### **Development Management Policy SD11: Trees, Woodland and Hedgerows**

<sup>13</sup> <https://www.horsham.gov.uk/planningpolicy/planning-policy/horsham-district-planning-framework/local-plan-review-2018>

<sup>14</sup> <https://www.southdowns.gov.uk/planning/national-park-local-plan/>

Development proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands.

**Strategic Policy SD17: Protection of the Water Environment**

**Strategic Policy SD19: Transport and Accessibility**

Development proposals will be permitted provided that they are located and designed to minimise the need to travel or promote the use of sustainable modes of transport

**Strategic Policy SD20: Walking, Cycling and Equestrian Routes**

Development proposals will be permitted provided they contribute to a network of attractive and functional non-motorised travel routes, with appropriate signage, throughout the National Park.

**Strategic Policy SD23: Sustainable Tourism**

**Strategic Policy SD34: Sustaining the Local Economy** Development proposals that foster the economic and social well-being of local communities within the National Park will generally be permitted.

**Strategic Policy SD45: Green Infrastructure**

Development proposals will be permitted where they demonstrate that they: a) Maintain or enhance green infrastructure assets, green infrastructure links and the overall green infrastructure network; and b) Provide new green infrastructure, or improvements to existing green assets and green linkages.

**Strategic Policy SD49: Flood Risk Management**

Development proposals will be permitted that seek to reduce the impact and extent of all types of flooding.

## 7. SUSTAINABILITY ISSUES

7.1 As part of the Sustainability Appraisal it is necessary to identify the key sustainability issues facing the parish. These have been informed through the following sources:

- A review of the policies outlined in the Horsham District Planning Framework.
- A review of the policies of the Submission South Downs National Park Local Plan
- Collection and analysis of baseline data (Section 5 of this report).
- Feedback from local community and consultation events to date.
- The Focus Groups SWOT results – see below.

7.2 The parish profile identified sustainability issues that are common to rural communities. Various consultation exercises, as well as the Vision Report, have also fed into the issues listed below:

- Housing affordability and access to affordable / smaller homes suitable for younger / lower income people trying to access housing market
- Maintaining the natural and historic character of the parish and its setting in the South Downs National Park
- Maintaining the parish's natural landscape
- The surface water and fluvial flood risk that the parish suffers from and which impacts significantly on residents
- Improve accessibility for pedestrians, cyclists and safe routes to school with better links to Bramber and Steyning.
- Develop a green infrastructure plan that improves recreation and leisure opportunities within the Park for the community.
- Maintain Upper Beeding's role as a provider of local shops.
- Community facilities to be retained, maintained and improved.
- Improvements in the range of employment uses on the existing employment sites, supporting an increase in local employment and benefits to the local economy.
- The redevelopment of the Cement Works site.

7.3 The tables below set out the strengths, weaknesses, opportunities and threats (SWOT) results provided by each of the Neighbourhood Plan focus groups. This provides a useful summary of the key issues identified by the community for the Plan.

## Community and Infrastructure SWOT analysis

### Strengths

- Good quality primary education facilities.
- Good access to centres of major population
- Good access to foot paths, cycle tracks and bridle ways for rural pursuits.
- Active Church congregations.
- Well mixed generational community.
- Fibre Optic Broadband is available and highly beneficial for businesses.
- Commitment to 'Beeding in Bloom' as a Community Venture.

### Weaknesses

- Outlying areas do not use many of the facilities.
- No identifiable village centre in Upper Beeding
- No health care facility in Small Dole
- Sewage network not adequate
- Narrow roads and on road parking issues: Trouble spots identified as Newland Rd/Undermill Rd, Hyde Lane/High Street
- Primary School is near capacity
- Lack of activities for Teenagers (as per questionnaire)
- Lack of affordable housing stock resulting in young people moving away.
- Lack of easily identifiable sites suitable for further housing.

### Opportunities

- Willingness to develop a stronger community ethos.
- Development of the redundant cement work site
- Care services for the elderly at home could be co-ordinated and run in and from the Dawn Close Clinic. This building is currently under-utilised.
- To develop a network of marked and safe tracks for cycling within the community.
- Potential to use Community Infrastructure Levy to fund community projects

### Threats

- Inadequate road network for future development
- Flood risk and sewage risk in Upper Beeding
- Removal of subsidies to rural bus services
- Lack of provision for increasingly elderly population
- Primary School reaching capacity.

## Housing & Development SWOT analysis

### Strengths

- Recent flooding has highlighted the benefit of our flood plains
- The parish has its own unique character and needs to be retained
- Our 15<sup>th</sup> century properties compliment the architecture of the village
- The parish boundary is on an area of outstanding natural beauty
- Rural setting near to Brighton / London
- Property prices competitive compared to Hove/ Brighton
- Only 90 mins. from centre of London
- Good schools / catchment area
- Safe community to live in

### Weaknesses

- Parishioners apathy to want to get involved / engage
- Roads are very narrow to support large vehicles
- Railway does not exist
- High Streets used as 'rat runs'
- Not enough business units for businesses to set up or expand
- Infrastructure nearing capacity.
- High Speed Broadband not available to all.
- Lack of Parking to support development
- Not enough Care Homes
- Limited Medical Care and access to Hospitals / Medical
- Limited retail outlets in the parish

- Insufficient data to support housing and development needs
- Lack of futuristic mind set to develop for the next 20 years

### **Opportunities**

- Farmers/land owners who want to release land for new builds
- Check if there are any brownfield sites for development.
- Ask parishioners if they are aware of opportunities for development.
- What planning applications are there to increase accommodation?
- Old Cement Works has real development opportunities
- Develop existing buildings to house more people with local incentives
- Industrial estates; are they being used to their maximum
- Produce housing needs survey to identify villager's demands
- Possible development opportunity on mobile home sites
- Change the use of mobile home sites for permanent use
- We have good data to estimate the housing needs for the future.
- Recommend the design & materials to protect the uniqueness of builds
- To develop the villages in the parish so that they keep village status.
- To retain open spaces to ensure that any dwelling has adequate space
- To allow children to play in an open environment
- To use and develop allotments.
- Develop an initiative to ensure empty properties become occupied
- Establish housing requirements with the local housing associations: Moat, Raglan, Saxon Weald, Southern Housing, English Rural Housing Association, Greenoak Housing Association, Southdown Housing Association, Lewes Land Trust and Grosvenor Estate

### **Threats**

- Southdown Downs National Parks Plans may conflict with NP
- Horsham District Council Plans may impact our NP.
- Large Developers may only provide bland out of character housing
- Current open spaces could be under threat of being built on
- Extra development could impact our infrastructure if not reviewed also.
- The design and buildings not in keeping with the village
- No additional housing is forcing families born & bred in village to leave
- Lack of single housing to meet ageing population needs
- Lack of local employment options means people have to move
- Large housing estates could increase crime and disorder.
- Could be forced to build on the flood plain
- Adjoining parishes development plans not complimentary to ours

## **Countryside and Environment SWOT analysis**

### **Strengths**

- Located in the valley of the River Adur largely within the South Downs National Park with good communications to nearby towns.
- Parish amenities are good, including village halls, chemist, supermarket, post office, churches, pubs, skate board park and part-time doctor's surgery.
- Many active special interest societies and sports clubs.
- Many generations of family have lived, and continue to live, within the parish giving a sense of continuity.
- A good allocation of well used allotment space.
- The parish has its own water supply borehole within the chalk downland.
- Biodiversity in a landscape context includes Sites of Importance for Nature Conservation, SSSI's, Ancient Woodland, Local Nature Reserves, Local Wildlife Sites and Special Protection Areas
- Biodiversity Action Plan Priority Habitats include Coastal and Floodplain Grazing Marsh, Lowland Calcareous Grassland, Lowland Fens, Lowland Meadows and Deciduous.
- A large area of Flood Plain protects the built area from flooding
- Within the parish there are Conservation Areas, Listed Buildings and Scheduled Monuments The landscape has a rich history
- A rich variety of character in the landscape
- An extensive network of various types of Public Right of Way and Open Access Land which are used in a variety of ways including access from outlying areas of the parish into central areas, for

cycling, equestrianism, rambling, dog walking, bird watching, wildlife watching, star gazing and fitness activities

- The parish contains areas of landscape which have the highest Relative Tranquillity score rating.

### **Weaknesses**

- A large amount of the undeveloped land on the settlement boundaries is designated Flood Zone 3
- Geographical constraints also hinder further development opportunities
- There is a lack of amenity land for the size of the population.
- The historical areas of the parish have narrow twisting roads which limit the traffic flow from some of the more recently developed housing areas. The congestion is seen as a safety risk.
- There is a lack of land available for infilling due to past building expansion.
- The extensive estate building in the past has not reflected the character of the historic buildings in the settlements with detrimental impact on present day appearance.
- Communication between Upper Beeding and Small Dole is poor due to lack of public transport and the lack of a footpath/cycle path between the settlements.
- The outlying houses at Dacre Gardens have a gap in the footpath network linking them to the main pedestrian route into the centre of the village.
- There is a lack of footpath/cycle path from the main settlement area of Upper Beeding to the bridge across the river leading to Steyning.
- Some of the main access footpaths into the village become impassable during the winter.
- Much of the Public Rights of Way network needs improvement for wheelchair and buggy access.
- The appearance of the Cement Works is a cause of great public concern.

### **Opportunities**

- To increase amenity land.
- To engage with the South Downs National Park to help deliver their vision and objectives for our community.
- Engage with the South Downs National Park Dark Skies initiative.
- Enhance leisure and tourism opportunities within our parish by a variety of means.
- Improve signage, improve parking facilities both for cars and horse boxes, and increase visitor awareness by displaying information boards.
- Increase road safety and facilitate the South Downs Way crossing over the main road for walkers, cyclists and horse riders.
- Improve the access from High Trees car park to The South Downs Way.
- Improve footpath access to the centre of the parish from outlying settlements, as at Dacre Gardens and Small Dole which would help to bring communities together.
- Improve popular dog walking routes so they are accessible all year round to all age groups.
- Build a footpath/cycle path from Upper Beeding village to the bridge over the river leading to Steyning.
- Improve existing well used footpaths to make accessible during the winter.
- Make more routes accessible for wheel chairs and buggies.
- Create more quiet and peaceful spots within the village to be used as tranquil green space, such as outside St Peter's church overlooking the river and the field next to the Rising Sun Public House.
- Develop the use of the river for recreation by building pontoons.
- To include some of the Wildbrooks area into a new amenity space where a freshwater wildlife pond could be created.
- To work towards bring our communities together by facilitating community events and engaging the community further in local affairs.
- To plan a programme of planting of trees and hedgerows to enhance biodiversity within the parish and mitigate the effects of climate change.
- Engage in improving the Cement Works site by appropriate re- development.
- To use a Design Statement for all future development to ensure that the character and appearance of the settlements is enhanced, especially by incorporating the traditional flint walls of the historic housing in the area.

### **Threats**

- Excessive development within the parish resulting in traffic congestion and unsustainable demands on infrastructure.
- Loss of community spirit due to poor links between the settlements.
- Risk of flooding due to the volume of water flowing under Beeding Bridge could be adversely affected by major developments upstream increasing the river flow.
- A significant area of the parish is Zone 3 Flood Zone and at risk of flooding.
- Sewage infrastructure is poor and in need of significant improvement.

- The long-term neglect of much essential infrastructure is beginning to show.
- Fast flowing traffic on main roads represents a safety hazard to recreational activities.
- Uncertainties about the natural environment due to a changing climate for example the risk of flooding likely to increase.
- Important views out of the settlement and much valued by the community are at threat from the lack of space for development.
- Net loss of green infrastructure due to development.
- Loss of biodiversity from concreting over front gardens.
- Individual trees, as well as ancient or veteran trees which may be protected by a preservation order, are important contributors to the character and biodiversity of our parish and are vulnerable to indiscriminate felling.
- Development of the Cement Works site could result in significant loss of habitat for a wide range of species of fauna and flora, including protected species, as this is an ecologically valuable site.

## 8. SUSTAINABILITY FRAMEWORK - OBJECTIVES

- 8.1 In order to assess the contribution the Submission Neighbourhood Plan will make towards achieving sustainable development, a range of sustainability objectives have been developed. These are based on social, economic and environmental objectives and each is quantified by a number of indicators. The objectives and indicators make up the sustainability framework.
- 8.2 The sustainability framework was consulted upon at the Scoping Report stage and refined following this consultation and the health check undertaken by Horsham District Council in May 2018. It was also consulted on in summer 2018 as part of the Regulation 14 process. The objectives chosen represent the issues and challenges facing Upper Beeding.
- 8.3 When appraising the strategy and policies within the Neighbourhood Plan, an assessment will be made as to their predicted impact on the sustainability framework. The main intention of the Sustainability Appraisal is to identify the likely impacts (both positive and negative) of approaches being considered through the Plan and subsequently the policies contained within. It is not intended as a scoring system to justify particular options taken forward but does form part of the evidence base which has led to the policies contained within the Neighbourhood Plan itself.
- 8.4 The sustainability objectives and their corresponding indicators are as follows. These include those within the Scoping Report plus key amendments made following the consultation feedback.

<b>Objective 1 Housing</b>	To provide high quality market and affordable housing with a range of size, types and tenures appropriate to local needs:  1a - will the UBNP improve the availability of decent, affordable housing? 1b – will the UBNP provide a range of housing types of various sizes and tenures? 1c – will the UBNP make better use of brownfield land for housing?	<b>SOCIAL</b>
<b>Objective 2: Community Facilities</b>	To ensure everyone has access to appropriate and affordable community, educational and leisure facilities:  2a - Will the UBNP sustain or increase the provision of community facilities? 2b – Will the UBNP maintain and improve existing educational and leisure facilities?	<b>SOCIAL</b>

<p><b>Objective 3: Biodiversity</b></p>	<p>To protect and enhance the quality and level of biodiversity and natural habitats within the parish and provide new green infrastructure and access to green and nature areas.</p> <p>3a - Will the UBNP lead to the loss to biodiversity, flora or fauna as a result of development, either directly or through habitat fragmentation?  3b – Will the UBNP seek to include measures to improve biodiversity and links to nature /green space as part of any proposed development?  3c - Will the UBNP avoid impacts on, and where possible improve, the quality and extent of existing recreational assets, such as natural open spaces and formal and informal footpaths?</p>	<p><b>ENVIRONMENTAL</b></p>
<p><b>Objective 4: Landscape</b></p>	<p>To conserve and enhance the quality of landscape and townscape character in the parish:</p> <p>4a - Will the UBNP result in a deterioration of the quality of the landscape or village-scape?</p>	<p><b>ENVIRONMENTAL</b></p>
<p><b>Objective 5: Heritage</b></p>	<p>To conserve and enhance the quality and distinctiveness of the historical environment of the parish:</p> <p>5a - Will the UBNP protect and enhance designated features of historical or cultural interest (e.g. Listed buildings, archaeological sites, ancient monuments, the Conservation Area?)  5b – Will the UBNP sustain and enhance the settings and views of heritage assets?</p>	<p><b>ENVIRONMENTAL</b></p>
<p><b>Objective 6: Flooding</b></p>	<p>To ensure that development does not increase the risk of flooding.</p> <p>6a - Does the UBNP minimise or aim to mitigate the risk of flooding?  6b - Will the UBNP ensure removal of surface water by sustainable methods that will enhance the environment and biodiversity?</p>	<p><b>ENVIRONMENTAL</b></p>
<p><b>Objective 7: Accessibility</b></p>	<p>To ensure new development does not increase on-street parking along the narrow roads and lanes and improves facilities for pedestrians.</p> <p>7a – will the UBNP support new or improved pavements, crossings, signage and public realm areas?  7b – Will the UBNP ensure that all new development has adequate on-site parking provision?</p>	<p><b>ENVIRONMENTAL</b></p>
<p><b>Objective 8 Businesses</b></p>	<p>Support the growth of local businesses to meet the needs of the parish.</p> <p>Will the UBNP support existing shops and businesses?  Will the UBNP provide potential for new businesses within the parish?</p>	<p><b>ECONOMIC</b></p>

## Upper Beeding Neighbourhood Plan objectives

8.5 The Submission Neighbourhood Plan sets out a number of strategic objectives. These state what the Neighbourhood Plan is aiming to achieve through its overall strategy and policies. An assessment has been made as to whether the 8 Neighbourhood Plan objectives are consistent with the 8 objectives of the sustainability appraisal. This exercise helps identify where potential areas of conflict lie and where mitigation may be required.

8.6 The objectives for the Neighbourhood Plan are as follows:

<b>Objective 1</b>	To conserve and enhance the special character, and qualities of the National Park landscape and the character of the rest of the countryside of the parish and maintain the settlement pattern.
<b>Objective 2</b>	To support the role of Upper Beeding as a local shopping centre with increased commercial activity, visitors and tourism whilst protecting the character of the High Street.
<b>Objective 3</b>	To support the provision of new and improved community, sports, leisure and educational facilities for a wide range of parish needs and to reinforce a shared identity and purpose.
<b>Objective 4</b>	To secure the future of the existing employment uses within the parish and plan for their growth to serve and support the local economy.
<b>Objective 5</b>	To plan positively for new housing to meet local needs, in particular for elderly downsizers, that is sympathetic to the scale, topography and character of the parish and that will not have a detrimental impact on the setting.
<b>Objective 6</b>	To develop a green infrastructure plan for the parish that will improve accessibility for pedestrians, cyclists and safe routes to school and for better links to Bramber and Steyning. To provide access to, and enjoyment of the SDNP as a recreation and leisure amenity and to improve connections from the parish to the South Downs Way and the South Downs Link.
<b>Objective 7</b>	To ensure the built environment, natural environment and areas of biodiversity are protected and enhanced for future generations. This includes protecting areas of open space.
<b>Objective 8</b>	To support South Downs National Park Authority in the future planning of the Cement works.

8.7 These have been assessed for compatibility with the Sustainability Objectives in the table below:

NEIGHBOURHOOD PLAN OBJECTIVES									
SUSTAINABILITY OBJECTIVES		1	2	3	4	5	6	7	8
	1	X	√		X	√		X	√
	2		√	√			√	√	X
	3	√		√		X	√	√	X
	4	√		√		X	√	√	X
	5	√	√		√				
	6					X			
	7	√		√			√		
	8		√		√	X			√

Key:

√	Compatible
X	Incompatible
	No link/neutral

8.8 In summary, the key areas where there is incompatibility between the Neighbourhood Plan objectives and the sustainability objectives are as follows:

- Neighbourhood Plan objective 1 to protect the character, qualities and identity of the landscape could be incompatible with the sustainability objective 1 to provide high quality housing. This will depend on the location of the housing and the ability to mitigate any impacts. This does not mean the Neighbourhood Plan will automatically allocate sites for housing in landscape sensitive settings but in a parish such as Upper Beeding where landscape setting is an important consideration, there is potential for these two issues to be incompatible.
- Neighbourhood Plan objective 4 to secure the future of the existing employment uses could be incompatible with the sustainability objective 1 to provide high quality housing where there could be a loss of employment space in order to provide housing. The Neighbourhood Plan will consider this issue as part of the site appraisal work but there is potential that some employment land could be lost.
- Neighbourhood Plan objective 5 to plan positively for new housing to meet local needs could be incompatible with sustainability objectives 3, 4, 6 and 8. These relate to protecting and enhancing the quality and level of biodiversity and natural habitats, conserving and enhancing the quality of landscape, to ensure that development does not increase the risk of flooding and supporting the growth of local businesses. The

extent to which there is an incompatibility with the Neighbourhood Plan objective will depend on the sites allocated for housing and the ability to mitigate any impacts.

- Neighbourhood Plan objective 7 to ensure the built environment, natural environment and areas of biodiversity are protected and enhanced could be incompatible with the sustainability objective 1 to provide high quality housing. Depending on the sites selected for allocation, should these be green field sites, then areas of biodiversity and natural environment may be impacted.
- Neighbourhood Plan objective 8 to support South Downs National Park Authority in the future planning of the Cement works could be incompatible with sustainability objectives 2, 3 and 4 – these are to ensure everyone has access to appropriate and affordable community, educational and leisure facilities, protect and enhance the quality and level of biodiversity and natural habitats, and conserve and enhance the quality of landscape and townscape character. The Cement works is unrelated to any settlement and located within the National Park. This means that matters relating to landscape, accessibility to facilities for the residents of the parish are considered significant and the Cement works may negatively impact on these issues.

## 9 POLICY APPROACHES AND OPTIONS FOR SITE ALLOCATIONS

- 9.1 A key element of the SA process is the appraisal of 'reasonable alternatives' for the Neighbourhood Plan. The SEA Regulations<sup>15</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'.
- 9.2 An important part of the SA process is the appraisal of different options for policy areas to help identify the most sustainable approaches to be taken forward in the Neighbourhood Plan. For some of the policy areas, a number of different potential approaches were developed and appraised against the sustainability framework to identify the preferred approaches. Although it is necessary to consider alternatives to a plan, only those that are feasible and realistic (i.e. are reasonable) should be included in any assessment.
- 9.3 This exercise has taken into account the format adopted in the Horsham District Planning Framework 2015 and Sustainability Appraisal Environmental Report 2015. There are no specific assessments made for Upper Beeding within the HDPF SA however reference is made to the impact of flooding, matters relating to landscape sensitivity and ground water supplies. The development strategy approaches provided within this SA have been based on those within the HDPF sustainability appraisal as being the most relevant to Upper Beeding. Reference has also been made to the South Downs National Park Authority Sustainability Appraisal of the Submission South Downs Local Plan 2018<sup>16</sup>.
- 9.4 No specific housing numbers have been allocated for the parish within the HDPF, however work carried out by AECOM on the Housing Needs Assessment has provided a housing need figure for the Neighbourhood Plan. A spatial analysis was carried out as part of the Vision Statement in 2015 (see Scoping Report) looking at the parish's wider setting and relationship to the landscape and adjacent settlements as a starting point for considering the issues that the Neighbourhood Plan should consider. This was followed by a more detailed examination of the two villages of Upper Beeding and Small Dole with consideration of the issues particular to each of them.

---

<sup>15</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>16</sup> <https://www.southdowns.gov.uk/wp-content/uploads/2016/11/SDNPA-Sustainability-Appraisal.pdf>

9.5 With regard to **Upper Beeding** – the Vision Statement noted the following issues to consider in the Neighbourhood Plan:

1. Any growth of Upper Beeding will be constrained by the sensitivity of the setting and other environmental constraints such as flooding and would need to be carefully planned and of a scale and design that would not harm the existing structure, character or definition of the village.
2. Plans for growth should consider community amenities and infrastructure as well as housing, and a review of local housing needs should look at affordability and providing a balanced mix of housing.
3. The green space in the centre of Upper Beeding is an important community asset which being landlocked has no space to expand. It acts as a community focus with the school, allotments and recreation facilities. These assets should be protected from development that would lead to a loss of open space or constrain their future uses for the community.
4. The village has a number of other open space assets, including landscape and green areas as part of the public realm within the housing areas. These also should be recognised and protected.
5. Improvements in connectivity, particularly for pedestrians and cyclists, both within the village and to other settlements and amenities should be considered as part of a green infrastructure plan.
6. Upper Beeding's village centre and commercial activities have a close relationship with Bramber's, even though they are not completely continuous, and consideration should be given to liaising with their Neighbourhood Plan to identify shared ambitions and common interests including employment and tourism.

9.6 For **Small Dole**, the Vision Statement noted the following:

1. Any growth of Small Dole will be constrained by the sensitivity of the setting and other environmental constraints such as flooding and would need to be carefully planned and of a scale and design that would not harm the existing structure, character or definition of the village.
2. Any plans for residential growth also needs to be considered in the context of the Henfield Neighbourhood Plan proposals for the village.
3. The character, role and facilities in the village centre, although modest, are an asset and part of the village's character. Consideration should be given to opportunities for adding to them, securing their viability and protecting them from being lost.
4. The longer term plans for the employment areas should be addressed through the Neighbourhood Plan with opportunities for improvements and diversification considered, and the importance and impacts of these employment uses to the local community, Upper Beeding and the wider area.
5. The longer term plans for the waste site should also be addressed through the Neighbourhood Plan with opportunities for environmental improvements and the creation of amenity landscape and spaces considered
6. The wider landscape setting offers opportunities for improving the local green infrastructure and improving linkages

7. There is a sense of separation between Small Dole and Upper Beeding, reinforced by each having a different centre, Small Dole being closer to Henfield and Upper Beeding to Steyning, it will therefore be important to establish common purpose and shared ambitions through the plan.

9.7 The Sustainability Appraisal will consider a number of approaches and options in order to guide the spatial strategy of the Neighbourhood Plan. The Parish Council also considered a number of general issues where options were not identified but where broad approaches for consideration and discussion have been included in this SA. These issues, where no alternative approaches have been proposed include:

*What approach should the Neighbourhood Plan adopt to best meet local housing need?*

This considers options for providing sites that are 100% affordable housing for local need such as rural exception sites. The Parish Council felt that the Neighbourhood Plan should present a mix of sites that included both market and affordable. These would be considered on a site by site basis.

*How best should the Neighbourhood Plan ensure a 'sufficient' supply of housing?*

This would consider whether the Neighbourhood Plan allocated a housing yield for specific sites within the policies or simply allocate sites in accordance with the preferred approach and exact housing numbers were to be determined at a later stage. The Parish Council felt that in order to ensure there is a sufficient supply of housing, an over-arching housing policy would include housing numbers (even if presented as a yield range or general number) and these policies would then be assessed against the sustainability objectives in the SA.

*Should the Neighbourhood Plan safeguard employment sites?*

As this issue would only relate to two sites, the Parish Council felt there weren't alternative options to consider against the sustainability objectives and therefore assess the draft policy as part of the SA.

*Should the Neighbourhood Plan prioritise derelict, redundant and brownfield land?*

The Parish Council felt that even if land is to be allocated for development outside of the existing settlement boundary that a priority should be given to sites with existing buildings where possible. Depending on whether there were sufficient brownfield sites that could accommodate the needs of the village, the Parish Council would continue with this priority and would only consider other options if required.

9.8 In respect of housing sites, the Parish Council presented a discussion of 3 'issues' for focus. Each Issue has been considered against a number of options set against the Sustainability

Objectives with each option ranked according to preference (1-3), with 1 being the most preferred option. The Issues and options are as follows:

**Issue A – How should development be located with the parish?**

Option A1: Spread development across the parish to include within settlements, adjacent to settlements and the countryside.

Option A2: Spread development within or adjacent existing settlements in the parish either evenly per settlement or proportionally according to the size of the settlement.

Option A3: Locate development within existing settlement boundaries only either evenly per settlement or proportionally according to the size of the settlement.

**Issue B - What approach should the Neighbourhood Development Plan adopt towards the number and size of development sites?**

Option B1: The Neighbourhood Development Plan's approach is to allocate a range of separate sites both large (over 10 units for residential) and small (10 units and under).

Option B2: The Neighbourhood Development Plan's approach is to allocate a range of separate smaller sites (10 units and under).

Option B3: The Neighbourhood Development Plan's approach is to allow all development to be delivered in one large strategic allocation (over 30 units).

**Issue C – How much new housing should be provided over the plan period?**

Option C1: The Neighbourhood Development Plan's approach should provide for up to 213 new dwellings in accordance with the results of the housing needs survey.

Option C2: The Neighbourhood Development Plan's approach should be to not allocate any sites for new housing.

9.9 The detailed appraisal of options for these issues is presented below.

**Issue A - Issue A – How should development be located with the parish?**

**Option A1: Spread development across the whole parish to include within settlements and adjacent to settlements.**

**Option A2: Spread development within or adjacent existing settlements in the parish either evenly per settlement or proportionally according to the size of the settlement.**

**Option A3: Locate development within existing settlements only either evenly per settlement or proportionally according to the size of the settlement.**

Sustainability Objective	Summary of the merit of each option	Rank of Preference		
		A1	A2	A3
<b>Objective 1: Housing</b>	Option A1 will effectively mean that some sites will be in locations considered remote and therefore not within sustainable locations but there is a possibility that these may be larger and able to accommodate much of the housing need for the parish. Option A2 would result in sites coming forward within the built up area as well as adjacent the settlement boundary and possibly within easy reach of bus routes and local facilities. For Option A3, this would focus on making better use of brownfield sites but in tight village settlements finding adequate sized sites within the urban area may prove difficult. Being able to consider sites within the boundary and adjacent (A2) may offer up opportunities that can accommodate a range of housing types and a larger scheme where benefits such as affordable housing can come forward. Therefore, both options A2 and A3 can offer homes in sustainable locations but with A2 enabling sites that can provide a range of benefits for the parish.	3	1	2
<b>Objective 2: Community Facilities</b>	Option A1 could offer the possibility of bringing forward new and/or enhanced facilities or secure the future of existing facilities through funding although, it is likely that sites outside of settlements and disconnected from them will lead to people needing cars for access. If new housing is built within the settlement or adjacent to it (Option A2) then residents are likely to be within walking distance of existing facilities. Sites adjacent to the settlements may have a greater opportunity to provide new open space or support the refurbishment of existing space. Option A3 may also offer these opportunities but there is a greater chance that sites will be too small to offer new facilities.	1	2	1
<b>Objective 3: Biodiversity</b>	Sites not connected to settlements (Option A1) will tend to have greater impact on landscape and local biodiversity and due to their isolated nature – will not easily link up to the settlement via green infrastructure. It is likely these sites will have a greater impact on areas of biodiversity value.	3	2	1

	Development of these sites may result in footpaths being diverted and habitats being fragmented. Sites within and abutting the settlement boundary (Option A2) may be able to provide green links to areas of nature but if they are medium tracts of green fields any development will have an impact on areas of biodiversity value. Sites that are within the settlement (Option A3) are likely to have less impact on biodiversity as it would be unusual to find tracts of greenfield/areas of high biodiversity value however - sites may be small in number and size and therefore be less able to create new or improved local green infrastructure.			
<b>Objective 4: Landscape</b>	Sites not connected to settlements will tend to have greater impact on the landscape (Option A1). Sites within and abutting the settlement boundary (Option A2) may have greater impact on the surrounding landscape however; some areas will be of higher landscape sensitivity than others and therefore would be selected on that basis. Sites that are within the settlement (Option A3) are likely to have less impact on the landscape of the National Park, the surrounding area or the open views from the surrounding countryside.	2	1	1
<b>Objective 5: Heritage</b>	Upper Beeding contains a significant number of listed buildings and contains two conservation areas. There are no Listed Buildings or Conservation Areas in Small Dole. Therefore, concentrating new development solely within the settlement (Option A3) could have the greatest impact on the historic environment and the setting of a number of significant buildings. Sites that are located outside of settlements (Option A1) may have minimal impact on the historic environment but may impact on archaeological assets and/or ancient monuments. Sites located adjacent the settlement boundary that are not abutting a building of significance within the settlement including listed buildings and the setting of the conservation area could have minimal impact on the historic environment (Option A2).	1	1	2
<b>Objective 6: Flooding</b>	Sites both within and outside the settlements can be subject to flooding. Conversely, those that are in countryside may be within areas of lower flood risk. Therefore, this issue is to be considered on a site by site basis and therefore is not ranked.	-	-	-
<b>Objective 7: Accessibility</b>	Many sites within the settlements will be accessed through narrow roads where parking is already difficult. Sites abutting the settlement may still require access via narrow lanes in order to get to the site from within the settlement but may be large enough that adequate parking can be provided as part of the development (Option A2). A site within the countryside (especially if it is of a scale, will allow for new roads to be built however it will result in an increase in traffic. It is also less likely to provide new routes for pedestrians due to the site being located	3	1	2

	away from the settlement (Option A1). Development within the settlement boundary where roads are narrow and there is limited space to improve this (Option A3) will impact on this objective. However, these sites will be in close proximity to public transport routes.			
<b>Objective 8 Businesses</b>	This issue can only be assessed on a site by site basis and therefore is not ranked.	-	-	-

### Summary

The above exercise shows that Options A2 and A3 are considered to be the most appropriate and sustainable spatial options to take forward in the Neighbourhood Plan. Option A2 is marginally the most sustainable. It scores well in relation to bringing forward new homes in sustainable locations; possibly creating new community space and/or allowing easy access to existing facilities. Care will need to be taken when choosing sites to ensure that landscape value and open space and biodiversity are not harmed as well as impacts on heritage assets. In addition, the impact of development on narrow roads and pedestrian access will need to be carefully considered.

**Issue B - What approach should the Neighbourhood Development Plan adopt towards the number and size of development sites?**

**Option B1: The Neighbourhood Development Plan’s approach is to allocate a range of separate sites both large (over 10 units for residential) and small (10 units and under).**

**Option B2: The Neighbourhood Development Plan’s approach is to allocate a range of separate smaller sites (10 units and under).**

**Option B3: The Neighbourhood Development Plan’s approach is to allow all development to be delivered in one large strategic allocation (over 30 units)**

Sustainability Objective	Summary of the merit of each option	Rank of Preference		
		B1	B2	B3
<b>Objective 1: Housing</b>	All three options will allow housing development to come forward although including a number of small sites (Option B2) may mean that some do not provide for a range of affordable housing or different sized houses. Smaller sites by their nature may fall predominantly within the settlement and thus be within sustainable locations. A mix of medium sized and smaller sites (Option B1) will mean the NP remains flexible and bring forward sites suitable for within the built up area boundary and abutting it. In a location such as Upper Beeding where some of the parish falls within a National Park – there are few options for larger sites (Option B3) but bringing forward large sites does mean some of the benefits for the parish can be delivered. However, this option does limit opportunities to redevelop or regenerate sites across the parish and there are no other options if the one site doesn’t deliver.	1	2	3
<b>Objective 2: Community Facilities</b>	Smaller development sites (Option B2) may not have the opportunity to bring forward new open space/ recreation facilities or community facilities or enable funding to spent on improving existing. With bringing forward larger sites, this is a possibility. Contributions can be sought from medium - large schemes that include an element of market housing (Options B1 and B3). A larger strategic allocation will enable funding and provision of new open space however this may not be within an accessible location (Option B3).	1	3	2
<b>Objective 3: Biodiversity</b>	Smaller sites may easily and readily fall within the settlement. These will have minimal impact on areas of biodiversity (Option B2). Larger sites that are allocated on green fields will have a greater impact on biodiversity (Option B3). Option B2 which provides for a range of sites will enable those with less impact on areas of biodiversity value to be selected together with	1	1	2

	including some larger sites that could create new areas of ecological value. This option allows for greater flexibility.			
<b>Objective 4: Landscape</b>	Smaller sites, usually within the settlement will have minimal impact on areas of landscape value (Option B2). Larger sites that are allocated on green fields will have a greater impact on landscape depending on the location. Any large site located within the National Park will have a significant impact on the landscape. The approach of either a range of small sites and/or a range of separate sites of both large and small will provide the best option as it creates flexibility to select those with the least impact and/or create new areas of landscape value.	1	1	2
<b>Objective 5: Heritage</b>	This matter is dealt with on a scheme by scheme basis depending on the location of the sites in relation to conservation areas and listed buildings and other heritage assets. However, smaller sites within settlements may have a greater impact on heritage assets such as conservation areas.	-	-	-
<b>Objective 6: Flooding</b>	This matter will be dealt with on a site by site basis and flood areas will impact on sites whether small or large.	-	-	-
<b>Objective 7: Accessibility</b>	Smaller sites will generate less volume of traffic and bring less cars into the settlement however, smaller sites may not be able to provide much off street parking to accommodate all residents and visitors (Option B2). A range of small and medium sites will allow some to be developed that are away from the existing narrow roads and be able to accommodate cars on site (Option B1). This would be the same for a one large development site. This would possible be located away from the narrow roads and will accommodate parking on site however, it will generate a large amount of traffic and be located away from public transport. It will offer less in terms of pedestrian access and links to the villages (Option B3).	1	2	2
<b>Objective 8 Businesses</b>	Some of the options have the potential to bring forward opportunities for commercial/tourism/workshop type facilities and/or bring in new customers to support existing shops. This will be considered on a site by site basis.	-	-	-

## Summary

Following consideration Option B1 was considered to be appropriate to take forward into the Neighbourhood Plan. This option will allow a range of sites to come forward. Through supporting a range of sites to come forward, it offers a flexible approach for the Neighbourhood Plan to consider and including several larger sites within the mix will mean that improvements for pedestrians and off-street parking, the provision of green space/links to the countryside and a wide range of housing types can be delivered.

## Issue C - How much new housing should be provided over the plan period?

**Option C1: The Neighbourhood Development Plan's approach should provide for up to 213 new dwellings in accordance with the results of the housing needs survey.**

**Option C2: The Neighbourhood Development Plan's approach should be to not allocate any sites for new housing but depend on windfall developments.**

Sustainability Objective	Summary of the merit of each option	Rank of Preference	
		C1	C2
<b>Objective 1: Housing</b>	Option C1 will ensure that the Neighbourhood Plan seeks to address an identified housing need and is clear that it has a role in securing a range of types of housing provision to meet the needs of local people. There is no guarantee secured through Option C2 which provides no structure to the plan and leaves it open to scrutiny and challenge.	1	2
<b>Objective 2: Community Facilities</b>	By allocating sites for development (Option C1), there may be pressure on existing facilities but at the same time higher demand could result in the retention of such as patronage and use increases. In addition, new housing could be the catalyst for investment in existing or new facilities. Option C2 will have no impact as it retains the status quo and this may be supported by some who are concerned that new housing brings with it pressure on services such as schools.	2	1
<b>Objective 3: Biodiversity</b>	Sites that are allocated on green fields may have a greater impact on biodiversity. On paper Option C1 has the greatest impact on this approach as it seeks to allocate over 200 houses however any impacts will be assessed on a site by site basis and leaving the parish open for any site to come forward will mean any early mitigation has not been assessed and planned. Nevertheless, as this issue is site specific, it has not been scored.	-	-
<b>Objective 4: Landscape</b>	As above. This is a site specific matter and has not been scored.	-	-
<b>Objective 5: Heritage</b>	This matter is dealt with on a scheme by scheme basis depending on the location of the sites in relation to conservation areas and listed buildings and other heritage assets. Any housing development has the potential for negative impacts on this objective but by allocating sites, these impacts can be assessed and mitigated. As above, this has not been scored.	-	-

<b>Objective 6: Flooding</b>	This matter will be dealt with on a site by site basis.	-	-
<b>Objective 7: Accessibility</b>	Whilst new housing may have an impact on parking and the use of narrow roads, it is likely that most of this will be accommodated on site. New housing will enable the improvement of pedestrian links. Most housing developments have the potential for negative impacts on this objective but the extent of the impact will depend on where the housing is located and mitigation measures provided. However, as above, if a site is assessed and considered acceptable to be allocated then accessibility issues will be taken into account as well as any cumulative impact of a number of sites being allocated.	1	2
<b>Objective 8 Businesses</b>	This is site specific and has not been scored.	1	2

### Summary

It is important to note that whilst some of these objectives have not been scored against because they relate to site specific issues, Option C1 – the allocation of sites to achieve the housing need would be considered the most sustainable as all impacts from a development would be considered in advance before allocation. Therefore, this option would be preferable rather than not allocating sites and leaving this to windfall development coming forward over the plan period. This option would not be in accordance with the NPPF and development plans for the parish.

## The housing site allocations - options

- 9.10 A number of sites have been put forward through the call for sites exercise (undertaken August/September 2014 by the Parish Council but with regular interest taken on board by the Parish Council if new sites came forward) and other sites that have been identified by the community. In total 19 sites were submitted to the Parish Council during the call for sites exercise. Members of the Neighbourhood Plan steering group appraised each of the sites taking into account site constraints and other matters. These assessments are available from the Parish Council and from the following <http://upperbeeding-pc.gov.uk/neighbourhood-plan/>. The Parish Council instructed AECOM consultants in 2017 to carry out a full site assessment. The results of this work have been fed into the Neighbourhood Plan and the SA. Copies of the AECOM Site Assessment report 2018 can be found on the parish council's website. This work provided a robust and independent assessment of sites. Not all of the 19 sites were put forward to AECOM and a summary of the reasons for this decision is attached as an appendix to the Neighbourhood Plan.
- 9.11 A list of sites that have been considered through the SA are as follows, however not all of the sites have been appraised.

Site Number	Site address
1	Strip of land Smugglers Lane, Upper Beeding
2	Land east of Pound Lane, Upper Beeding
3	Little Paddocks, Upper Beeding
4	2 Dacre Villas, Upper Beeding
5	Newbrook Industrial Estate, Pound Lane
6	Land at Greenfields Henfield Road
7	Land on Shoreham Road, near to High Trees
8	Field next to the Rising Sun pub.
9	Shoreham Rd behind trees between Toll Cottage and bungalows.
10	Shoreham Cement Works
11	Southern end of Oxcroft Farm, Small Dole.
12	The Bostal between Blesswell Farm and 12 Castletown
13	College Rd
14	Beeding Court Farm
15	Henfield Rd Castletown
16	Valerie Manor Henfield Rd
17	Church Farm, Upper Beeding
18	Riverside Caravan park, Upper Beeding
19	Land west of Henfield Road, Small Dole

9.12 As well as assessing the sites against the sustainability objectives, they were also given a score as shown below. This relates to the level of positive or negative impact any development would have on the sustainability objectives.

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

9.13 The results of the site assessments are attached as **Appendix D**.

9.14 This has taken into account the advice presented within the AECOM Site Assessment report that three sites to the north of Upper Beeding village (strip of land at Smugglers Lane, land east of Pound Lane and Little Paddocks) would, if they were combined into a comprehensive scheme, bring forward a number of benefits for the settlement and wider parish. As all three sites were assessed through the SA process as having a positive impact on a number of sustainability objectives, it has been decided that they should form one site and be included within the Neighbourhood Plan. This combined site is named Land east of Pound Lane. The other sites to be taken forward include land at Greenfield, Oxcroft Farm and Riverside caravan park.

9.15 Further work will be needed to address the specific constraints for each site. The shortlist is based on the impacts of new development on the sustainability objectives (SO). The Steering Group will need to consider deliverability and the extent of housing yield for each site before moving forward with draft policies for the preferred housing sites.

### **Flood Risk Sequential Approach**

9.16 A Sequential Test has been prepared to assess the flood risk of all sites within the parish that have been considered for potential development in the Neighbourhood Plan and this should be read in conjunction with the SA/SEA.

9.17 Neighbourhood Plans are a planning policy tool to enable town and parishes to plan how their communities will change and develop in the future. In addition to the strategic sites

identified in the Horsham District Planning Framework (which were subject to a separate strategic flood risk assessment), the Neighbourhood Plan seeks to allocate a level of additional homes for Upper Beeding.

- 9.18 A sequential approach is used to steer new development to areas at the lowest risk of flooding. As the sites allocated in the Neighbourhood Plan were not assessed under the District Sequential Test, the report submitted with the UBNP addresses this.
- 9.19 The Sequential Test draws upon information gathered and detailed within the District Council's Strategic Flood Risk Assessment (SFRA) as well as the site assessment work carried out by AECOM. The tests follow the steps outlined in the National Planning Policy Framework and accompanying technical guidance and follows examples of best practice as highlighted by the Environment Agency.
- 9.20 The National Planning Policy Framework 2018 (paragraphs 157 and 158) requires Plans such as the District Plan and Neighbourhood Plans to '*apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding*'.
- 9.21 The NPPF states that 'If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed'.<sup>17</sup>.
- 9.22 When assessed against the considerations in the SEA/SA, Land east of Pound Lane, Greenfield, Oxcroft Farm and Riverside Caravan Park outweigh the other sites assessed and have therefore been allocated in the NP. It needs to be recognised that the SEA/SA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based only on these factors in order to select an option. Factors such as public opinion, deliverability, wider benefit to the

---

17

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

community and conformity with national policy have also been taken into account when selecting options for the plan. To this end, these sites have been allocated although a section of the sites are in FZ3, as such needs to pass the exception test.

- 9.23 It is assumed that Part 1 of the exception test would be passed for the portions of the sites which are outside Flood zone 1 because of the wider sustainability benefits to the community that outweigh flood risk and in order to fully demonstrate those sustainability aspects, a Sustainability Assessment has been undertaken of all the sites. Where sites are wholly or partly located in areas where there are other sources of flooding, a site-specific flood risk assessment will be required at planning application stage. For the individual site applications, a sequential approach to development within the site, Part 2 of the exception test and the use of Sustainable Drainage Systems<sup>18</sup> will be necessary to avoid and mitigate any impact. Part 2 of the exception test requires the development to be safe, and this will need to be demonstrated in a site specific Flood Risk Assessment.
- 9.24 The Sequential Test completed for the UBNP is a separate document and should be read in conjunction with this SA. It concludes the following with regard to the sites within the NP:

Site Ref.	Location	Allocated in the Plan	Flood risk zone (FZ)	Passes the Sequential test	Passes the exception test
Sites 1, 2 and 3 below are known as Land to the east of Pound Lane within the UBNP					
Site 1	Strip of Land, Smugglers Lane	<b>Yes</b> (sites 1,2 &3 to be combined)	The eastern boundary of the site is located within FZ 3	<b>No</b>	<b>Yes</b> (Part 1 met and Part 2 to be met through mitigation proposals)
Site 2	Land east of Pound Lane	<b>Yes</b> (sites 1,2 &3 to be combined)	The eastern boundary of the site is located within FZ 3	<b>No</b>	<b>Yes</b> (Part 1 met and Part 2 to be met through mitigation proposals)
Site 3	Little Paddocks	<b>Yes</b> (sites 1,2 &3 to be combined)	The north and east parts of the site are located within FZ 3	<b>No</b>	<b>Yes</b> (Part 1 met and Part 2 to be met through mitigation proposals)
Site 4	Land at Greenfields, Henfield Road	<b>Yes</b>	The southern part of the site is located within FZ 3	<b>No</b>	<b>Yes</b> (Part 1 met and Part 2 to be met through mitigation proposals)
Site 5	Oxcroft Farm, Small Dole	<b>Yes</b>	Flood zone 1	<b>Yes</b>	n/a
Site 6	Valerie Manor (within SDNP)	<b>Yes</b>	The southwest corner of the site is located within FZ 3	<b>No</b>	<b>Yes</b> (Part 1 met and Part 2 to be met through mitigation proposals)
Site 7	Riverside Caravan Park	<b>Yes</b>	Flood zone 3	<b>No</b>	<b>Yes</b> (Part 1 met and Part 2 to be met through mitigation proposals)

<sup>18</sup> <https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/dealing-with-flooding/flood-risk-management/sustainable-drainage-systems/>

9.25 The next section of the SA will assess all of the NP policies against the SO including housing allocation policies.

## 10 APPRAISING THE NEIGHBOURHOOD PLAN POLICIES

10.1 A wide range of policy areas have been included within the Submission Neighbourhood Plan. These will be appraised as to whether they have a positive or negative impact on the future of the parish, using the Sustainability Framework to undertake the evaluation.

10.2 In the absence of the Neighbourhood Plan, it is considered there will be fewer opportunities to address the issues and challenges facing Upper Beeding. Without the Plan, opportunities for the following issues may be comprised:

- Greater involvement of local people in local/community planning,
- Be able to protect and retain community facilities,
- Opportunities to allocate sites that are supported by the local community,
- Opportunities to protect, improve and/or enhance green spaces and open spaces,
- Opportunities to seek good design and layout within new developments
- Opportunities to address the issues of flood risk and access.

10.3 All policies have been appraised in order to assess their impact against the 8 sustainability objectives. These are set out below. This exercise ensures that the policies within the Neighbourhood Plan are the most sustainable, given all the reasonable alternatives. The appraisal process has been undertaken using the methodology outlined in section 3. A summary of the appraisal is given in each case. As before, the same colours and symbols have been used. This relates to the level of positive or negative impact any development would have on the sustainability objectives.

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

10.4 Whilst it is predicted that many of the policies will have an overall positive or neutral/unknown impact, it is inevitable that some of the options appraised will present negative sustainability impacts. This will be mostly in cases where the sustainability objectives are not compatible

with one another. Where negative impacts are predicted to arise, mitigation has been suggested.

10.5 The policies contained in the Submission Neighbourhood Plan are:

Policy 1 Spatial Plan for the Parish

Policy 2 Housing Allocations

Policy 3 Land east of Pound Lane, Upper Beeding

Policy 4 Land at southern end of Oxcroft Farm, Small Dole

Policy 5 Land at Greenfields, Henfield Road, Upper Beeding

Policy 6 Riverside Caravan Park, Upper Beeding

Policy 7 Land at Valerie Manor, Henfield Road, Upper Beeding

Policy 8 Design Standards for New Development

Policy 9 Community Facilities

Policy 10 Employment Sites and Supporting Businesses

Policy 11 Local Green Spaces

10.6 In most cases the policies have been assessed against a 'do nothing' option in order to assess which one can achieve the vision and objectives. Otherwise known as 'business as usual' – this being what would happen to the parish if a Neighbourhood Plan were not to be prepared (e.g. by relying on national and local planning policies).

10.7 Tables Aa to Ak as attached in **Appendix E** set out all of the policies as now included in the Submission UBNP and a number of reasonable alternatives (options) for each. The text for each policy may be different to those within the Regulation 14 version of the UBNP as the policies have been amended to take on board changes and comments recommended following the consultation at Regulation 14 stage. This is because the SA forms part of the iterative process of developing the Neighbourhood Plan. The final policy wording now needs to be re-assessed against the SA objectives. A copy of the Regulation 14 version of the SA is available from the Parish Council. Table B (**Appendix F**) summarises all of the policies.

## **11 APPRAISAL OF ALTERNATIVE AND THE CUMULATIVE EFFECTS OF THE PLAN**

- 11.1 The purpose of this report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Development Plan in accordance with EU Directive 2001/42 on strategic environmental assessment (“the SEA”) and the Environmental Assessment of Plans & Programmes Regulations 2004 (“the EA Regulations”). This report is a revised report and contains more consistent assessment of all sites and the cumulative effects of the NDP.
- 11.2 The Sustainability Appraisal (SA) seeks to address the wider sustainability objectives when applying the sequential test in line with national guidance with the aim to achieving sustainable development as per the National Planning Policy Framework.
- 11.3 The report seeks to undertake this wider assessment in a way that is proportionate to the task and that recognises the limitations of the available data and means of measuring direct and cumulative effects. In doing so, the SA/SEA must be proportionate and “does not need to be done in any more detail ... than is considered to be appropriate for the content and level of detail in the Neighbourhood Plan” (National Planning Practice Guidance ID:11-031<sup>19</sup>).
- 11.4 Throughout the development of the NP a number of modifications have been made to the plan policies to reflect changes made. However, modifications to the SEA only need to be considered where appropriate and proportionate to the level of change being made to the Neighbourhood Plan...and a change is likely to be significant if it substantially alters the draft plan and or is likely to give rise to significant environmental effects (ID: 11-42). This SA/SEA Report is considered to demonstrate that the NP, when taken as a whole, will achieve a significant contribution to sustainable development.
- 11.5 The main sustainability issues in the neighbourhood area to which the Neighbourhood Plan responds are managing the effect of recent and future scale of housing development whilst ensuring the delivery of community infrastructure in the right parts of the village to serve current and future needs.
- 11.6 Outlining the different approaches that could have been included in the plan as well as different site options is an important part of the SA process. Analysing reasonable alternatives demonstrates that the most sustainable options for the plan have been identified.

---

<sup>19</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

This part of the appraisal process considers different spatial strategies for the plan, it then goes on to examine the effects on the sustainability of the area if a plan is not “made”. This is the main alternative in terms of policy options for the plan. Finally, the main sites that have been excluded from the Plan have been appraised. Appraising these potential sites is, therefore, a reasonable alternative to those in the draft plan.

#### **a) Alternative options – spatial strategy**

- 11.7 The spatial strategy proposed for the plan has fewer negative effects as it seeks to balance the need for housing to meet local needs against the significant environmental constraints that exist in the plan area. As outlined in section 9 there could be negative effects from the spatial strategy on the heritage and flooding objectives. Delivery of fewer houses would also have a negative effect on the support and provision of community facilities as well as economic development. This is mainly due to most of the sites being partly in flood zone 3. However, these potential negative effects are likely to be mitigated by appropriate policies in the plan and higher level plans.

#### **b) Alternative policy approach**

- 11.8 The main reasonable alternative for the policies in the plan is the “do nothing scenario”; that is the effect of the sustainability of the area if the Neighbourhood Plan is not in place. Considering the effects of sustainability without the plan is also a requirement of the SEA Directive.
- 11.9 Without the Neighbourhood Plan proposals for housing development in the parish would not be guided by the local community to ensure that a mix of housing can be achieved. Other environmental assets, such as ecology and landscape are also afforded greater protection from the Neighbourhood Plan. Tables Aa to Ak as attached in **Appendix E** set out all of the policies within the Submission UBNP and a number of reasonable alternatives (options) for each.

#### **c) Alternative sites**

- 11.10 All sites submitted through the call for sites exercise were originally assessed against the sustainability objectives. All sites were also assessed by AECOM.
- 11.11 The results of the site assessments are attached as **Appendix D**.

#### **d) Cumulative effects**

- 11.12 Cumulatively the plan is likely to make a positive contribution to housing, economic development and community. However, there are also likely to be some cumulative negative effects particularly relating to flooding due to increased surface water run off combined with the existing flood zones.
- 11.13 A further potential impact from this spatial and site allocation approach is a cumulative effect on heritage assets and a potential effect on the landscape. However, given the scale of the development proposed in the plan and policies to address these impacts, overall this effect is unlikely to be a significant.
- 11.14 Although the overall impacts on the environment are largely mixed as a minimum, there will be no worsening of existing issues connected with the environment and for a significant number (i.e. it is neutral in some aspects) will result in positive impacts to the environment from the adoption and implementation of all the policies contained within the plan.
- 11.15 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 NP will positively contribute towards delivering the social, economic and environmental objectives set out in the SA framework.

## 12 MITIGATING AND MONITORING

- 12.1 The SA has identified potential negative and positive effects arising from the plan. Changes to policies have been made as a result of the responses received at the Regulation 14 stage. The final policies are now assessed in this SA. **Appendix F** lists the policies in one table.
- 12.2 In addition to these specific changes there are some general issues that have been identified through the appraisal process. The plan is generally positive in terms of socio-economic issues and certain environmental issues. Due to the significant presence of Flood Zone 2 and 3 in the parish, the Plan needs to sufficiently address this. Although national policy and higher level plans deal with this, the plan would be strengthened by some additional text on this local issue. This could refer to the presence of this flood zone and the need for mitigation measures such as incorporating sustainable urban drainage systems and/or design features within proposed new dwellings.
- 12.3 The sustainability effect of the Neighbourhood Plan should be monitored for both its positive and negative impacts. The most significant effects to be monitored will be in terms of the provision of housing units constructed, impact on heritage and landscape and incidence of flooding.
- 12.4 Some monitoring measures are collected by Horsham District Council in its Authority Monitoring Report as well as the South Downs National Park Authority. In other cases, the Parish Council will endeavour to collect data to report on the progress of the plan.

# **APPENDIX A**

## **Horsham District Council checklist**

## SEA requirements and where they are addressed in SA Report

Requirements	Where covered in the report
An outline of the contents, main objectives of the plan or programme, and relationships with other relevant plans and programmes.	Chapters 2 & 3, scoping report and Pre-Submission SA
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapters 4 & 5, scoping report and Pre-Submission SA
The environmental characteristics of areas likely to be significantly affected.	Chapters 5 & 6
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 7
The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapters 7 & 8
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. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative.	Chapters 7 & 8
The measures envisaged to prevent, reduce and as fully as possible off-set any significant adverse effects on the environment of implementing the plan or programme.	Chapters 9 & 10
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.	Chapters 10 & 11
A description of measures envisaged concerning monitoring in accordance with Article 10.	Chapter 12

# **APPENDIX B**

## **Responses to Scoping Report**

## Responses to Scoping Report<sup>20</sup>

Consultee	Date of response <sup>21</sup>	Summary of Comments	Response and paragraph of amendments
<b>Environment Agency</b>	Letter dated 15th Sept 2016	<p>We have identified the following environmental constraints in the designated area of the Neighbourhood Plan, relevant to our remit:</p> <ul style="list-style-type: none"> <li>• Land within Flood Zones 3 and 2, associated with the flood risks from the River Adur and Woods Mill Stream. The ecological value of these watercourses and their adjacent land is also an environmental consideration.</li> <li>• Source Protection Zone 1, 2 and 3. These are designated to protect individual groundwater sources for public water supply. Of most significance is the Southern Water abstraction near Castle Town.</li> <li>• Historic and authorised landfill sites, including the Horton and Small Dole sites in the north of the parish.</li> </ul> <p>We are pleased to see that an objective is included that relates to biodiversity. The sites referred to in the SHLAA surrounding Upper Beeding are located within or near areas valuable for the water environment. We recommend considering the inclusion of an indicator under the biodiversity objective that asks whether the policies in the Neighbourhood Plan will secure the enhancement of biodiversity at these sites. This should help to guide policies to ensure opportunities to improve the environment of Upper Beeding are taken up by developers. We also recommend an objective is included to protect and enhance the wider water environment. Indicators should relate to flood risk and water quality.</p>	Thank you for your comments. We have included these in the baseline table in section 5. We have included an objective on flooding. A new indicator has been included under objective 6.
<b>Natural England</b>	Letter sent as email 22 <sup>nd</sup> August 2016	<p>Natural England notes that the SEA Scoping Report states that the Horsham District Planning Framework (HDPF) is the only other plan that carries significant importance in terms of policy making for the Upper Beeding Neighbourhood Plan (UBNP). Whilst the UBNP must conform to the policies in the HDPF, we advise that other plans are relevant and should be considered. In particular, the South Downs National Park Management Plan (and the emerging Local Plan), but also any green infrastructure strategies, biodiversity plans or river basin management plans for the area.</p> <p>Natural England understands that Upper Beeding Parish Council considers that some issues are so fundamental that the UBNP would never suggest any</p>	Thank you for your comments. We have included a list of all key documents in paragraph 4.5 and updated the baseline information in section 5 to include references to other documents. We have also included objectives that relate to flood risk. We have also updated objective 3 to include access to nature.

<sup>20</sup> Some further work has been undertaken on the baseline and other information within this SA/SEA over and above that referenced here and within the updated Scoping report because of the gaps in timescales.

<sup>21</sup> The date of responses span over 2016/2016 as there were 2 periods of consultation

		<p>policies that would be detrimental, e.g. to flood risk, and so there are no objectives on these issues proposed for the SA/SEA. We welcome this commitment to producing a sustainable plan. However, we recommend including objectives on the full range of environmental issues that are relevant to the parish, as this provides an audit trail to show why some proposals, e.g. those in flood zone 3, have been rejected at an early stage of plan making.</p> <p>We suggest that the scope of Objective 2 is broadened to include access to nature (be that to linear routes or open space) as well as community facilities. If the scope is broadened, an additional question could be: 'Will the UBNP avoid impacts on, and where possible improve, the quality and extent of existing recreational assets, such as natural open spaces and formal and informal footpaths?'</p>	
<b>West Sussex CC</b>	1 <sup>st</sup> July 2016 email	The County Council does not have sufficient resources available to respond in detail to Neighbourhood Plan consultations (including SA/SEAs) unless there are potentially significant impacts on its services that we are not already aware of, or conflicts are identified with its emerging or adopted policies. When consulted we consider whether or not we will submit a response and if a response is needed, whether this be in the form of a formal County Council response to a consultation or general planning policy advice and development management guidance.	Thank you and noted.
<b>AECOM on behalf of the SDNPA</b>	Report dated 10 <sup>th</sup> August 2015	<p>The context review presented in the NP SA/SEA scoping letter highlights that 'Given the requirement for the UBNP to contain only land use planning policies, the HDPF is the only other plan that carries significant importance in terms of its policy making'. Whilst it is recognised that the context review should be proportionate for the purposes of the SA/SEA of this Neighbourhood Plan, it is considered that the breadth of the review should be widened beyond that of the Horsham District Planning Framework to consider a number of further documents.</p> <p>Whilst the environmental baseline data provided in the scoping letter is comprehensive, little data is provided on socio-economic elements, including population, quality of life, health or transport. In light of the stated intention to undertake a SA/SEA (rather than a SEA), the exclusion of socioeconomic baseline data is therefore a significant omission.</p> <p>In this context the SA Framework presented in the scoping letter does not directly link the context review, baseline data and key issues identified earlier in scoping with the proposed SA objectives and decision making questions.</p>	Thank you for your comments. We have included a list of all key documents in paragraph 4.5 and updated the baseline information in section 5. We have also included some socio-economic information in the Portrait of the Parish section. Through providing this information plus the SWOT tables in Appendix B, we consider this provides a clear link between the context review, the baseline information and the SA framework. We also consider there is a clear link between this information and the sustainability objectives which have been added to in light of yours and

		<p>Instead it states that it has selected those objectives of the SA/SEA accompanying the Horsham District Planning Framework that are considered the most relevant and informative for the purpose of the Neighbourhood Plan. There is further potential for the link between the context review, baseline data, key issues and the proposed SA Framework to be discussed through the scoping letter.</p> <p>Objectives 1 and 2 where there is no clear evidence base to justify their inclusion. Therefore, there is further opportunity for the scoping letter to more clearly signpost how socioeconomic elements have been justified through the scoping process, and the reasoning why certain socio-economic elements have not been explicitly considered. This could be effectively communicated in a table the listed the SEA Directive topics and a reason for their inclusion / exclusion.</p> <p>More problematic is the link between the SA/SEA Objectives and the evidence base. The objectives and criteria appear to be quite generic and don't reflect spatial /demographic issues in the area. For example, Objective 1A 'improve the availability of decent, affordable housing' is so generic it could apply anywhere. The framework needs to set out clearly how it reflects local / community issues. This should be done to avoid accusations that the framework is not fit for purpose.</p> <p>Whilst elements related to the Special Qualities and Purposes and Duty are in part addressed through the SA Framework, there is further potential for these elements to be considered through the initial stages of scoping.</p>	<p>other consultee comments. Taking the baseline information and feedback from the Focus Groups, the objectives have been amended.</p>
<p><b>Horsham District Council</b><sup>22</sup></p>	<p>22<sup>nd</sup> July 2015 email</p>	<p>Please find our comments and observations set out below:</p> <p>1. Appendix A: Baseline Data: The Environmental Assessment of Plans and Programmes Regulations (2004) suggest that SA should describe the 'baseline environment' in your neighbourhood in terms of:</p> <ol style="list-style-type: none"> <li>a. Nature conservation</li> <li>b. Landscape</li> <li>c. Heritage</li> <li>d. <i>Air and climate</i></li> <li>e. Water</li> <li>f. <i>Soil</i></li> <li>g. <i>Human population</i></li> <li>h. <i>Human health;</i></li> </ol>	<p>Thank you for your comments. We agree that some further work on the baseline information can be added to the Scoping Report and these are included in the new chapter 3 – Parish profile. We have included as much of the baseline information as possible however, sustainability appraisals are to be commensurate to the level at which a Neighbourhood Plan operates. This is set out in</p>

<sup>22</sup> Horsham DC also provided comments and feedback on the SEA/SA as part of the health check comments in April 2018.

		<p>i. <i>And material assets (transport, water, infrastructure)</i></p> <p>We therefore recommend that the information in the Appendix is expanded to cover the elements which have not been addressed (namely those presented in <i>Italics</i>).</p> <p>2. In addition we recommend that information is provided to cover the baseline context for each of the identified SA objectives (namely Housing/Community/Biodiversity/Landscape/ Heritage) as this will assist in monitoring the effects of the policy in line with Schedule 2 (Regulation 12(3)) of the Environmental Assessment of Plans and Programmes Regulations (2004). Further details are provided below:</p> <ul style="list-style-type: none"> <li>a. Housing: It would be useful to provide information on the type/size and tenure of housing with the NP area, for example from the information available through a Housing Needs Survey</li> <li>b. Community: We recommend listing the types of facilities available in the NP area in order to test the effectiveness of Objective 2</li> <li>c. Biodiversity: <i>sufficient information provided</i></li> <li>d. Landscape: <i>sufficient information provided</i></li> <li>e. Heritage: <i>Sufficient information provided</i></li> </ul>	<p>paragraph 30 of the PPG which states:</p> <p><i>The strategic environmental assessment should only focus on what is needed to assess the likely significant effects of the Neighbourhood Plan proposal. It should focus on the environmental impacts which are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Neighbourhood Plan.</i></p> <p>Thank you also for your comments on the information to be provided in the baseline context for each of the SA objectives. Please note that the objectives have now changed. We have added further information in the table within Section 5.</p>
--	--	--	--

# **APPENDIX C**

## **Relevant Plans & Programmes**

<b>Title</b>	<b>Date</b>
<b>International</b>	
European Landscape Convention	2004
European Strategy on Sustainable Development	2001 and 2009 Update
EU Seventh Environmental Action Plan to 2020	2013
European Communities Directive on the Conservation of Wild Birds. Directive 2009/147/EC (this is the codified version of Directive 79/409/EEC as amended)	2009
EC Council Directive on the Conservation of Habitats and of Wild Fauna and Flora 92/43/EEC	1992
The Landfill Directive (1999/31/EC)	1999
EU COM (2002) 581 final: Proposal for a Directive concerning the quality of bathing water	2002
EU Water Framework Directive (2000/60/EC)	2000
EU Air Quality Directive - Ambient Air Quality and Cleaner Air for Europe 2008/50/EC	2008
<b>National</b>	
National 'Planning Practice Guidance' (PPG)	2012
National Planning Policy Framework	2012 & 2018
Department of Health 'White Paper - Healthy Lives, Healthy People'	2010
The Conservation of Habitats and Species Regulations 2010 (Chapter 8 covers Land Use Plans)	2010
Town and Country Planning Act 1990	1990
Planning and Compulsory Purchase Acts 2004 and 2008	2004 & 2008
DEFRA Sustainable Development Strategy 'Foundations of our Future'	2002
DfT 'Towards a Sustainable Transport System: Supporting economic Growth in a Low Carbon Economy'	2007
Planning (Listed Buildings and Conservation Areas) Act	1990
White Paper Heritage Protection for the 21st Century	2007
DCMS 'The Historic Environment: A Force for Our Future'	2001
DEFRA 'Future Water: The Government's Water Strategy for England	2008
ODPM 'The Planning response to Climate Change: advice on better practice'	2004
DEFRA 'Climate Change Act'	2008
The Air Quality (England) Regulations 2000 and 2002 Amendment	2000 & 2002
DEFRA 'Air Quality Strategy for England, Scotland, Wales and NI'	2011
DfT 'Delivering a Sustainable Transport System'	2008
Wildlife and Countryside Act 1981 (as amended)	1981
Biodiversity: UK Action Plan	
DEFRA Securing the future: delivering UK sustainable development strategy	2005
UK Climate Change Programme	2006
Countryside and Rights of Way Act (CROW)	2000
Making space for water Taking forward a new Government strategy for flood and coastal erosion risk management in England	2005

Safeguarding our soils: A Strategy for England Defra	2009
The Flood and Water Management Act 2010 HMSO	2010
Department for Transport Guidance on Accessibility Planning in Local Transport Plans	2004
Department for Transport Delivering a Sustainable Transport System	2008
Department for Transport Active Travel Strategy	2010
DEFRA Noise Policy Statement for England	2010
Energy Act	2008
DECC UK Renewable Energy Strategy	2009
CLG & DfT 'Manual for Streets 1 & 2'	2007
Environmental Protection Act	1990
Ministry of State for Environment and Agri-Environment 'Nottingham Declaration on Climate Change'	2000
Conservation (Natural Habitats &c) Regulations	2010
Natural Environment and Rural Communities Act	2006
DEFRA Natural Environment White Paper Defra	2011
Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Working Together for Clean Air	2011
CLG 'Code for Sustainable Homes': Setting the Sustainability Standards for New Homes and accompanying Technical Guidance - November 2010	2008 & 2010
Census Data	2001.
Environment Agency mapping	
<b>Sub regional/District</b>	
Horsham Core Strategy	2007
The Horsham District Planning Framework	2015
South Downs National Park Local Plan – Preferred Options	2015
South Downs Local Plan – Submission	2018
Partnership Management Plan: Shaping the Future of your South Downs National Park 2014-2019 (SNDP)	
West Sussex Minerals Local Plan	2009
NHS Horsham District Health Profile	2014.
River Adur Catchment and Flood Management Plan	2009
NWS Horsham Strategic Housing Market Assessment Update	2012
WSCC Transport Plan 2011- 2016 - February	2011.
Gatwick Sub Region Outline Water Cycle Study	2011
WSCC Indices of Deprivation 2010 Results and Analysis Report	2011
WSCC Landscape Strategy & Vision - September.	2010
NWS Employment Land Review Part 2. Final Report.	2010
South East Water, Water Resources Management Plan, 2010-2035.	
Northern West Sussex (NWS) Economic Appraisal Part 1. Employment Land	2009
Sussex Biodiversity Partnership: Sussex Biodiversity Action Plan	
Crawley, Horsham & Mid Sussex Employment Land Review Final Report -	2006
South East River Basin Management Plan	2009
Southern Water, Water Resources Plan	2009.
HDC Affordable housing needs model update	2014

Horsham District Council - Settlement Sustainability Review	2014
Habitats Regulations Assessment of the Horsham District Planning Framework	2014
HDC Landscape Capacity Assessment Report	2014
HDC Green Infrastructure Strategy	2014
HDC Strategic Flood Risk Assessment	2007, 2010 and 2014
HDC The Sport Open Space and Recreation study	2014
Horsham Transport and Development Study	2014
Housing Need in Horsham District	2015
HDC Strategic Housing Land Availability Assessment Review	2014
SDNPA Water Cycle Study and Strategic Flood Risk Assessment	2015
SDNPA Transport Study – Phase 1 Report	2013
SDNPA Low Carbon and Renewable Energy Study	2012
SDNPA Access Network and Accessible Natural Greenspace Study	2013
SDNPA National Park Partnership Management Plan 2014-2019	2013
SDNPA Water Cycle Study and Strategic Flood Risk Assessment	2015
SDNPA South Downs Integrated Landscape Character Assessment	2011
Neighbouring Neighbourhood Plans	
<b>Upper Beeding</b>	
UBNP Environmental & Countryside Focus Team document	2016
UBNP Community and Infrastructure focus group report	2015
UBNP Local Green Space 2016	2016
UBNP Housing and Development Focus Group report 2015	2015
UBNP Community Evidence report 2015	2015
AECOM Housing Needs Assessment	2017
AECOM Site Assessment	2018

# **APPENDIX D**

## **Assessed Sites**

Submitted Sites	Sustainability Objectives								Notes
	1	2	3	4	5	6	7	8	
1	++	-	-	?	??	-	-	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment (Site ref SA 055):</b> The majority of this site was identified within the Reserve Housing Sites Preferred Options document and is therefore deemed suitable for residential development. Whilst the far eastern edge of site is affected by flood risk, a small amount of residential development may be suitable on the western part of the site to facilitate easy access and allow for open space / recreation on the eastern part. The site is therefore assessed as deliverable in 1 to 5 years.</p> <p><b>AECOM Site Assessment report.</b> The site is adjacent to the built up area of Upper Beeding and the site is a logical location for redevelopment. Any development will need to take into account Flood Zone 3 to the east of the site where it is suggested that public open space should be provided. Any development would also have to be sympathetic to the character and setting of the listed building to the west of the site. Any development would also need to be designed to ensure that views from the South Downs National Park are considered.</p> <p><b>SA appraisal:</b> This is a greenfield site which has been assessed as suitable for housing within the SHLAA and SHELAA 2016. It scores as having a greater positive impact on SO1 as it adjacent the built up area boundary and is of a size capable of accommodating a range of housing types including affordable. The site has a neutral impact on community facilities (SO2) as it is within a sustainable distance to some local facilities but not all as set out in the AECOM report. It has scored as having a neutral impact on SO3 as whilst it is greenfield and therefore may have a detrimental impact on biodiversity, it also offers opportunities to create new areas of ecological value. It has a slight negative impact on SO4 due to its countryside location. Being outside the settlement boundary it will have an impact on the landscape character. It will have a negative impact on heritage (SO5) due to the listed building on the corner. Whilst the far eastern edge is affected by flood risk (SO6), this has been assessed as having a neutral impact as the area can be reserved for open space. This has been scored as having a neutral impact on SO7 because outline plans show that the development could provide adequate parking space within the site however there remains a concern about access into the site and the impact on the country green lane (Smugglers Lane).</p>
2	++	-	-	?	??	-	-	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment (Site ref: SA483):</b> The eastern portion of the site is at risk of flooding and there is a Grade II Listed Building adjoining the site to the south. Development in this location would result in the overdevelopment of a countryside location and could impact the setting of the Listed Building. An outline application for 23 units DC/14/1745 was refused in 2015 due to the countryside location and proximity to the Listed Building. The site is considered not currently available.</p> <p><b>AECOM Site Assessment report.</b> The site is adjacent to Site 1 and it is considered that the site is suitable for allocation if it is brought forward alongside Site 1. Any development would need to take into account Flood Zone 3 to the east of the site. There is the potential to secure this area of the site as public open space connecting to the space proposed in Site 1. Any development would also have to be sympathetic to the character and setting of the listed building to the south of the site. Any development would also need to be designed to ensure that views from the South Downs National Park are considered. It is noted that the site was given the status 'Not Currently Developable' in the SHELAA. This assessment disagrees with the conclusions of the SHELAA as it is considered that any unacceptable impacts could be mitigated. There is also an opportunity to provide public open space in association with Sites 1 and 3 as the site sits between them.</p> <p><b>SA Appraisal:</b> This is a greenfield site which has been assessed as suitable for housing within the SHLAA and SHELAA 2016. It scores as having a greater positive impact on SO1 as it of a size capable of</p>

									accommodating a range of housing types including affordable. The site has a neutral impact on community facilities (SO2) as it is within a sustainable distance to some local facilities but not all as set out in the AECOM report. It has scored as having a neutral impact on SO3 as whilst it is greenfield and therefore may have a detrimental impact on biodiversity, it also offers opportunities to create new areas of ecological value. It has a slight negative impact on SO4 due to its countryside location. Being outside the settlement boundary it will have an impact on the landscape character. It will have a negative impact on heritage (SO5) due to the listed building on the corner. Whilst the far eastern edge is affected by flood risk (SO6), this has been assessed as having a neutral impact as the area can be reserved for open space. This has been scored as having a neutral impact on SO7 because outline plans show that the development could provide adequate parking space within the site.
3	++	-	-	??	-	-	-	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment (Site ref SA488 but includes part of SA053):</b> The site overlaps with SA053 which is considered unsuitable for development due to the open nature of the site, impact on the SDNP and proximity of flood plain. An outline application for 35 houses on the site (DC/14/1744) was refused in October 2015. A small element of development may be suitable in the longer term provided it does not have a negative impact on the SDNP.</p> <p><b>AECOM Site Assessment report.</b> The site is adjacent to Site 2 and it is considered that the site is suitable for allocation if it is brought forward alongside Sites 1 and 2. Any development would need to take into account Flood Zone 3 to the north and east of the site. There is the potential to secure this area of the site as public open space connecting to the space proposed in Site 1. Any redevelopment would also need to be designed to ensure that views from the South Downs National Park are considered and that there will be no adverse effects on the River Adur Water Meadows and Wyckham Wood Site of Nature Conservation Importance.</p> <p><b>SA Appraisal:</b> This is a greenfield site which has been assessed as generally unsuitable for housing within the SHLAA and SHELAA 2016. It scores as having a greater positive impact on SO1 as it is of a size capable of accommodating a range of housing types including affordable. The site has a neutral impact on community facilities (SO2) as it is within a sustainable distance to some local facilities but not all as set out in the AECOM report. It has scored as having a neutral impact on SO3 as whilst it is greenfield and therefore may have a detrimental impact on biodiversity, it also offers opportunities to create new areas of ecological value. It has a greater negative impact on SO4 due to its countryside location. Being outside the settlement boundary it will have an impact on the landscape character and when considered against sites 1, 2 and 3 it is the one furthest away from the settlement boundary and closer to the wider countryside and National Park. It will have a neutral impact on heritage assets (SO5). Whilst the far eastern edge is affected by flood risk (SO6), this has been assessed as having a neutral impact as the area can be reserved for open space. This has been scored as having a neutral impact on SO7 plans show that the development could provide adequate parking space within the site.</p>
4									This is a small site with the possibility of only accommodating 2 houses. It is also located within the SDNP and is unlikely to be supported by the SDNPA as a site for new housing.
5									Planning permission has already been granted for residential development on this site. Therefore, it is no longer a site that can be allocated for new development.
6	+	++	-	?	-	?	++	??	<b>Horsham DC SHLAA 2014/SHELAA 2016 comment: (Site ref: SA155)</b> There is no entry for the site in the SHELAA however feedback from a meeting with HDC is - this site is currently occupied and in use as an

									<p>employment site and therefore there is an objection in principle to the loss of this site to residential. Having said that however the site could be allocated for housing provided the Neighbourhood Plan could demonstrate that an additional employment site could be provided elsewhere.</p> <p><b>AECOM Site Assessment report.</b> The site is adjacent to the Upper Beeding built up area and is brownfield land. The redevelopment of the site for housing would have a positive impact on the townscape character of this part of the village. The site is will located with regard to amenities and services, however, part of the site is within Flood Zone 3 and would not be suitable for residential development. Any development will also need to take into account its impact on views from the South Downs National Park which is to the south of the site.</p> <p><b>SA Appraisal:</b> This site has an established business use. It is scored as a slight positive for SO1 as it is of a size that would enable a number of houses to come forward but it is not suitable for a wide range of different types and tenures. The site is well located in terms of access to local community facilities and therefore scores as having a slight positive impact on SO2. It has a neutral impact on biodiversity being a brownfield site but at the same time it offers limited opportunities to create new area of biodiversity value. It has a slight negative impact on SO4 as whilst it is outside the National Park, the boundary skirts around the site and any new development may have an impact on the landscape value of the NP. The site is located close to a conservation area and would need to take this into account but it is not abutting and therefore the impact is neutral. Part of the site is within flood zone 3 and therefore there is a slight negative. Access has a greater positive but the loss of employment scores as a greater negative (SO8)  </p>
7	++	-	-	??	-	-	-	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment:</b> Site within SDNP and comments from the SDNPA are as above as the PC has agreed with the summary of comments provided by the SDNPA.</p> <p><b>SA Appraisal:</b> This site is some way outside of the settlement boundary and within the SDNPA. It scores as having a positive impact on SO1 if it can accommodate a range of housing needs. However, it is a greenfield site and any housing development would have a visual impact on the surrounding landscape. It is also some distance away from the village centre of UB. It scores as having a slight negative impact on SO2 and SO3 as it is a greenfield site and not close to local community facilities. It scores as having a greater impact on SO4 due to the isolated position within the national park. This will have an impact on protecting the landscape. Site is located within the SDNP and is unlikely to be supported by the SDNPA as a site for new housing. It was not assessed by AECOM.</p>
8	++	-	?	??	-	??	?	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment:</b> Site not within SHLAA however comments from SDNPA state that the site is detached from the main settlement. Further consideration needs to be given to the potential landscape impacts of a possible Rural Exception development. The site is in the flood zone and there is a public right of way crossing the site.</p> <p><b>SA Appraisal:</b> The site is of a size that will enable some housing development to be delivered. However, it has a greater negative impact on SO6 which relates to preventing flooding within the parish. The site scores slightly negative on SO3 as it is a greenfield site and may result in the loss of biodiversity. It has a slight negative impact on SO7 due to the effect on the public footpath. It is within the National park and therefore scores as having a greater negative impact on landscape (SO4). Site is located within the SDNP and is unlikely to be supported by the SDNPA as a site for new housing. It was not assessed by AECOM.</p>
9	++	?	?	??	-	??	-	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment:</b> Site within SDNPA and the authority states it is detached from the main settlement and is in the flood zone.</p> <p><b>SA Appraisal:</b> This site is a greenfield site and any housing development would have a visual impact on the surrounding landscape. It is also some distance away from the village centre of UB. It is scored as having a positive impact on SO1 as it is capable of delivering a number of houses however it is within the SDNP and</p>

									outside a settlement boundary and the site is liable to flooding. Therefore, it scores as having a negative impact on SO4 and SO6. It has a slight negative impact on SO2 because of the proximity and links to existing community facilities and SO3 as it is a greenfield site and therefore may have an impact on the existing biodiversity value. The Site is located within the SDNP and is unlikely to be supported by the SDNPA as a site for new housing.
10									<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment:</b> This site is within the SDNPA. The SDNPA SHLAA states that due to the size and complexity of the site, it is beyond the scope of a high level assessment through the SHLAA to determine the suitability of this site for residential development at this stage. More detailed assessment will take place prior to the preferred options version of the Local Plan.</p> <p><b>SA Appraisal:</b> This a significant and strategic brownfield site within the SDNP. The SDNPA are the lead local authority for bringing forward a deliverable policy for the site. The size and complexity of the site is beyond the scope of a high level assessment through the SA.</p>
11	++	++	-	-	-	-	-	+	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment:</b> Not within the SHLAA. Comments from HDC include the appeal in respect of the Wates site in close proximity to this site has been withdrawn. The Henfield NP addresses the housing needs and issues within that parish area and therefore this site which lies within Upper Beeding NP area should assess this site and how it could address the housing needs within the UB NP area.</p> <p><b>AECOM Site Assessment report.</b> The site is adjacent to the Small Dole built up area on the west side of Henfield Road and is part brownfield part greenfield. The site is well screened from Henfield Road by existing vegetation and buildings. Existing vegetation also screens the site to the south but new vegetation would be required to screen the site to the west. Any development would need to take into account its impact on views from the South Downs National Park and ensure that the Horton Clay SSSI is not adversely affected.</p> <p><b>SA Appraisal:</b> This site is a greenfield site in Small Dole. It scores as having a positive impact on SO1. It has a slight negative impact on SO3 as it's a greenfield site and therefore may have an impact on biodiversity. It has scored as having a positive impact on SO2 as it is close to the centre of Small Dole. In all other aspects it has a neutral impact. The site promoter has confirmed that the development would not impact on the existing business. This has been scored as having a slight positive (SO8).</p>
12									This is a small site with the possibility of only accommodating 3 houses. It is also located within the SDNP and is unlikely to be supported by the SDNPA as a site for new housing.
13	++	?	?	??	-	-	?	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment:</b> The site is within the SDNPA. The NPA commented as follows - this site is likely to have significant detrimental impact on the landscape. Development at this site would intrude into the open rolling downland landscape of Windmill Hill and a new access road would have a further urbanising effect on the rural boundary between Upper Beeding and the surrounding countryside. The site is also visible from a public right of way and would be harmful to the enjoyment of the open downland landscape.</p> <p><b>SA Appraisal:</b> This site has been scored as having a positive impact on SO1 as it is of a size capable of delivering housing. However, its scores as having a slight negative impact on SO2 and 3 as it is not located close to the village centre and is a greenfield site – it will have an impact on biodiversity. It scores as having a greater negative impact on SO4 due to the impact on landscape and the SDNPA location. It also scores as having a slight negative impact on access. The site is located within the SDNP and is unlikely to be supported by the SDNPA as a site for new housing.</p>

14	++	?	?	??	-	-	-	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment:</b> the site is within SDNPA. Not supported by SDNP. This site is detached from the main settlement and does not relate well to the existing settlement pattern. The site is in an exposed position and is highly visible from the surrounding downland including from the South Downs Way.</p> <p><b>SA Appraisal:</b> Despite a refused application, the site scores as having a positive impact on SO1 as it is of a size capable of bringing forward new housing. However, it is within the SDNP and is in a location unrelated to the existing settlement. It scores as having slight negative impact on SO2 as it is remote from community facilities. It scores as having a greater negative impact on SO3 due to the impact of any development on the landscape and NP. It also scores as having a negative impact on SO3. Site is located within the SDNP and is unlikely to be supported by the SDNPA as a site for new housing.</p>
15	++	?	?	??	-	-	?	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment:</b> Within SDNPA – comments received state - we have concerns over development at this site; What scale of development is being considered? We are concerned about the impact of development on the well-established hedgerow and trees. Hedgerows should be used rather than fencing for boundaries. There is currently limited street lighting and the introduction of further lighting should be kept to the minimum necessary. Access to the site needs to be identified.</p> <p><b>SA Appraisal:</b> The site scores as having a positive impact on SO1 as it is of a size capable of bringing forward new housing. However, it is within the SDNP and is in a location unrelated to the existing settlement. It scores as having slight negative impact on SO2 as it is remote from community facilities. It scores as having a greater negative impact on SO3 due to the impact of any development on the landscape and NP. It also scores as having a negative impact on SO3. Site is located within the SDNP and is unlikely to be supported by the SDNPA as a site for new housing. Site is located within the SDNP and is unlikely to be supported by the SDNPA as a site for new housing.</p>
16									<p><b>SA Appraisal:</b> This site is not being promoted for market housing and therefore cannot be assessed using the same criteria as the above and below sites. It will be assessed as a standalone policy in the next section.</p>
17	++	?	??	-	??	-	?	-	<p><b>Horsham DC SHLAA 2014/SHELAA 2016 comment: (Site ref: SA629)</b> This is within the SHELAA. This site is located outside but abutting the BUAB of Upper Beeding meaning the principle of development may be acceptable if allocated through the Upper Beeding Neighbourhood Development Plan. The site is however located within the River Adur SNCI and would have an urbanising effect on the setting of St Peters Church which is located to the south east. Because of these constraints, the site is assessed as not currently developable however the site should be considered through the emerging UB NDP. In addition, further comments from HDC also states that this site is located outside the floodplain and is unlikely to be a significant issue. Any development would need to be sensitively designed. It is noted that the site is designated as an SNCI and would therefore need to be subject to ecological surveys to identify whether the features of this designation are on the site and that impacts are mitigated.</p> <p><b>AECOM Site Assessment report.</b> The site is adjacent to the Upper Beeding built up and is located within the River Adur Water Meadows and Wyckham Woods Site of Nature Conservation Importance and would therefore result in the direct loss of this site. Further information should be prepared detailing the site's contribution to the designation and the impact redevelopment will have on the designation. The site is adjacent to a listed building and any development will need to be sensitive to its character and setting (although it is noted that the building is well screened by existing vegetation and buildings). Further information is required regarding the access to the site as it would currently be taken from the end of Church</p>

									<p>Farm Walk. Church Farm Walk is a narrow winding road and it is unclear whether it could accommodate large vehicles that would be required during construction (low loaders/HGV) and operation (refuse vehicles)</p> <p><b>SA Appraisal:</b> This site scores as having a greater positive impact on SO1 as it is capable of delivering a number of houses. It has a slight negative impact on SO2 as it is not located within easy reach of local community facilities. It has a greater negative impact on SO3 and 5 because of the location within a SNCI. It also adjacent to a listed building (SO5). Access issue have been raised within the AECOM report and therefore it has a negative impact on SO7.</p>
18	++	++	-	-	?	??	-	-	<p><b>AECOM Site Assessment report.</b> The site is within the Upper Beeding built up area and is brownfield land. Its allocation will therefore not have an impact on the countryside. The wider site is located within a residential caravan park and the redevelopment as part of this allocation would be in keeping with this existing use. The site is located within Flood Zone 3 but it is understood that it is protected by flood defences. Further information should be prepared in the form of a Flood Risk Assessment to demonstrate that residential development can be accommodated on the site. Consultation with the Environment Agency regarding the allocation is also recommended.</p> <p><b>SA Appraisal.</b> The site scores as having a positive impact on SO1 as it is of a size capable of bringing forward new housing. It is well located to a number of community facilities (SO2). The site has a slight negative impact on SO5 because part of it is located within a conservation area. It has a greater negative impact on SO 6 because of the location within flood zone 3.</p>
19	++	??	?	??	-	-	?	-	<p><b>AECOM Site Assessment report.</b> The site is located to the west of Henfield Road and does not relate well to the built up areas of Upper Beeding or Small Dole. The site therefore does not comply with policy 4 of the HDPF. The southern part of the site is located within the South Downs National Park and development would result in the loss of greenfield land from the National Park. The site is also very open in nature, as such, any development would significantly change the character of the site in views from the surrounding area.</p> <p><b>SA Appraisal.</b> The site scores as having a negative impact on SO1 as it is of a size that is capable of delivering a number of houses. It has a negative impact on SO1 and 2 as it is not located near community facilities and any development could have an impact on biodiversity. The southern part of the site is within the SDNP and therefore it has a negative impact on SO4.</p>

# **APPENDIX E**

## **Assessed policies**

**Table Aa Policy 1: Spatial Plan for the Parish**

<p>Final policy in Submission NP</p> <p><b>The Neighbourhood Plan defines settlement boundaries for Upper Beeding and Small Dole, as shown on the Policies Map.</b></p> <p><b>Sustainable development proposals within these boundaries will be supported where they accord with the policies within the Neighbourhood Plan, the Horsham District Framework 2015 and the South Downs Local Plan.</b></p> <p><b>Conversely, development outside of the settlement boundaries will be required to conform to national and local planning policies in respect of protecting the countryside unless they are addressed by a site specific policy within this Neighbourhood Plan.</b></p> <p><b>Proposals will be resisted if they adversely affect the special qualities of the South Downs National Park, areas of valued open space, heritage assets, Local Green Space as identified in the Neighbourhood Plan and areas of biodiversity value.</b></p>								
Policy 1 Options	Obj 1 Housing	Obj 2 Community Facilities	Obj 3 Biodiversity	Obj 4 Landscape	Obj 5 Heritage Assets	Obj 6 Flooding	Obj 7 Accessibility	Obj 8 Business
A	++	++	++	++	++	-	+	+
B	?	?	?	?	?	?	?	?
C	??	-	?	?	?	?	-	-
<p>Option A – To have a policy that sets out when and where development will be acceptable, taking into account areas of landscape value, open space and other important parish assets. (final policy).</p> <p>Option B – To have a spatial policy that provides no guidance on whether development is acceptable within/adjacent or some distance from settlement boundaries</p> <p>Option C – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p><b>Appraisal:</b> Option A scores has having a greater positive impact on a number of the objectives. It provides certainty that housing can be brought forward and delivered and it refers to possible impacts on landscape, the National Park, biodiversity, heritage and open space. The policy doesn't directly refer to flooding and so has a neutral impact. Option B provides little certainty to bringing forward housing and is therefore scored as having a slight negative impact on SO1. Whilst this option doesn't rule out housing, it doesn't set the policy parameters of where housing would be acceptable. This option also provides little guidance on the impacts of development on a range of issues such as biodiversity and landscape etc. Option C is a 'do nothing' policy which means that it leaves decision making to the existing Development Plans and national planning guidance. However, the strategic policies within the Development Plans do not specifically refer to a range of housing sites within Upper Beeding as the policies are too high level. In addition, national planning policies are not specific to the parish. Therefore, whilst these policy documents would provide some guidance for the spatial planning of Upper Beeding, they are too general and high level to make a real impact on the parish. This option scores as having a greater negative impact on SO1 but has a slight negative impact on a number of the other objectives as these issues are set out within Development Plans and national policy but not in a detailed way and/or focussed on Upper Beeding.</p> <p><b>Preferred option A.</b></p>								

**Table Ab Policy 2: Housing Allocations**

<p><b>Final policy in Submission NP</b></p> <p>The following sites (as identified on the Policies Map) are allocated for the provision of around 109 new homes over the Plan period:</p> <ul style="list-style-type: none"> <li>• Land east of Pound Lane, Upper Beeding (around 70 houses)</li> <li>• Land at southern end of Oxcroft Farm, Small Dole (around 20 houses)</li> <li>• Land at Greenfields, Henfield Road, Upper Beeding (around 10 houses)</li> <li>• Riverside caravan park, Upper Beeding – (around 9 sheltered houses)</li> </ul> <p>The exact and final numbers of housing to be accommodated on each site will be confirmed once technical studies and surveys as set out in each individual site policy, are completed and approved by the relevant authorities.</p>								
Policy 2 Options	Obj 1 Housing	Obj 2 Community Facilities	Obj 3 Biodiversity	Obj 4 Landscape	Obj 5 Heritage Assets	Obj 6 Flooding	Obj 7 Accessibility	Obj 8 Business
	+	-	-	-	-	-	-	
<p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a slight positive impact on SO1 rather than a greater one as the provision of 109 dwellings does not achieve the housing need number as evidenced in the AECOM Housing Need Study report. There is a neutral impact on the other objectives as these aren't referenced in the policy.</p> <p><b>Recommend: To agree this is a policy that supports the sustainable objectives.</b></p>								

**Table Ac Policy 3: Land east of Pound Lane, Upper Beeding**

Final policy in Submission NP								
<p>The Upper Beeding Neighbourhood Plan supports a comprehensive development of the site known as Land east of Pound Lane as shown on the Policies Map for around 70 dwellings subject to the consideration of a landscape-led masterplan. Any proposal must be delivered in accordance with the following principles:</p> <ol style="list-style-type: none"> <li>Any proposal must include a landscape-led masterplan of which, there should be consideration of the following criteria:               <ol style="list-style-type: none"> <li>A thorough understanding of the historic evolution of the site is demonstrated as well as considering all the elements which contribute to the character of the site. These should inform design and layout of the site;</li> <li>Regard should be given to visibility and key views, especially from SDNP which should inform the earliest stages of design and layout;</li> <li>Regard should be given to the Adur Floodplain landscape character; and,</li> <li>Where appropriate existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition from urban to rural and help to minimise the visual impact of the expansion of Upper Beeding village with regards to the National Park.</li> </ol> </li> <li>Any proposal will deliver a proportion of retirement/sheltered housing for older people aged 55 and over to meet local need. The layout and location of this housing will be outlined in the masterplan and should be of an appropriate scale and massing in keeping with the character of the surroundings.</li> <li>Any proposal will deliver affordable homes in accordance with identified need and the policies in the development plan.</li> <li>Any development proposal should avoid harm to the setting of the Listed Building: Pound House Cottage. The design and layout of any proposal should also seek to preserve the special interests of the listed building.</li> <li>A comprehensive transport assessment must be submitted with the application. Any reasonable mitigation to make the development proposal acceptable in planning terms must be implemented in full.</li> <li>Primary access will be delivered off Pound Lane.</li> <li>A secondary access off Smugglers Lane is supported providing it is necessary and will not prejudice the comprehensive development of the site in its entirety. There should be consideration of the following detail:               <ol style="list-style-type: none"> <li>Access from Smugglers Lane should avoid harm to the setting of the Listed building and seek to preserve the special interest of the listed building.</li> <li>Regard should be given to the rural character of Smugglers Lane and development should not prejudice Smugglers Lane as public right of way.</li> </ol> </li> <li>Enhanced pedestrian and new cycle links from the site to Upper Beeding village centre are to be provided to improve connectivity from the site to the wider village.</li> <li>A full ecological and biodiversity survey of the site is submitted as part of the application. Any reasonable mitigation proposed by the surveys must be implemented in full.</li> <li>A flood risk assessment will be required to support a planning application. Any layout should follow the sequential approach to ensure the most vulnerable uses are placed in the lowest flood risk zone.</li> <li>An area to the north and east of the site, currently lying within the Flood Zone 3, will be laid out as open space and allocated as such. Support is given to the provision of Sustainable Drainage (SuDs) and the opportunity to create and enhance habitats and biodiversity.</li> <li>All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park.</li> </ol>								
Policy 3 Options	Obj 1 Housing	Obj 2 Community Facilities	Obj 3 Biodiversity	Obj 4 Landscape	Obj 5 Heritage Assets	Obj 6 Flooding	Obj 7 Accessibility	Obj 8 Business
	++	-	++	++	++	++	++	-
<p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a greater positive impact on most of the objectives although it has a neutral impact on SO2 and SO8.</p> <p><b>Recommend: To agree this is a policy that supports the sustainable objectives.</b></p>								

**Table Ad Policy 4: Land at southern end, Oxcroft Farm, Small Dole**

<p><b>Final policy in Submission NP</b></p> <p>The Neighbourhood Plan supports the development of the site as shown on the Policies Map for around 20 houses. Any development will need to address the following:</p> <ol style="list-style-type: none"> <li>1. The site is to deliver affordable homes in accordance with identified need.</li> <li>2. Access is to be from the Henfield Road (A3207).</li> <li>3. A full ecological and biodiversity written survey of the site is required to be submitted as part of a formal planning application.</li> <li>4. A strong 'landscape buffer' shall be provided to provide a robust, defensible boundary to the development, with consideration for views of the National Park and Horton Clay SSSI. Where possible existing boundaries will be retained and enhanced with native species. A landscaping scheme is required to be submitted with a planning application.</li> <li>5. The development shall be designed so not to unacceptably harm the amenity and privacy of occupiers of properties along Henfield Road.</li> <li>6. The pond within the site to be retained and incorporated within the scheme.</li> <li>7. Improvements to the pedestrian access connecting the site to existing bus stops are to be included as part of the overall development.</li> <li>8. Matters relating to land contamination should be considered as part of any planning application.</li> </ol>								
<b>Policy 4 Options</b>	<b>Obj 1 Housing</b>	<b>Obj 2 Community Facilities</b>	<b>Obj 3 Biodiversity</b>	<b>Obj 4 Landscape</b>	<b>Obj 5 Heritage Assets</b>	<b>Obj 6 Flooding</b>	<b>Obj 7 Accessibility</b>	<b>Obj 8 Business</b>
	++	-	++	++	-	-	++	-
<p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a greater positive impact on most of the objectives although it has a neutral impact on SO2 and SO5. Further details have been included within the supporting text regarding the existing business on the site.</p> <p><b>Recommend: To agree this is a policy that supports the sustainable objectives.</b></p>								

**Table Ae Policy 5: Land at Greenfields, Henfield Road, Upper Beeding**

<b>Final policy in Submission NP</b>								
<p>The Neighbourhood Plan supports the development of the site as shown on the Policies Map for around 10 houses. Proposed development will need to address the following:</p> <ol style="list-style-type: none"> <li>1. The site is to deliver affordable homes in accordance with identified need.</li> <li>2. Visibility and views from the National Park should inform the earliest stages of design of any development.</li> <li>3. Before development can commence, it needs to be demonstrated that alternative employment premises within the parish have been secured for the existing business.</li> <li>4. A land contamination study of the site is required to be submitted with an application.</li> <li>5. A landscaping scheme is to be submitted with the planning application. Any development should address the landscape impacts on the South Downs National Park. An appropriate landscape buffer and transition with the National Park boundary should be provided.</li> <li>6. The development shall be designed so not to unacceptably harm the amenity and privacy of occupiers of neighbouring properties.</li> <li>7. A full ecological and biodiversity survey and written report of the site may be required to be submitted with a planning application.</li> <li>8. A Flood Risk Assessment may be required with any application. No residential buildings are to be located within the areas of Flood Zones 2 and 3.</li> <li>9. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park Local Plan.</li> </ol>								
<b>Policy 5 Options</b>	<b>Obj 1 Housing</b>	<b>Obj 2 Community Facilities</b>	<b>Obj 3 Biodiversity</b>	<b>Obj 4 Landscape</b>	<b>Obj 5 Heritage Assets</b>	<b>Obj 6 Flooding</b>	<b>Obj 7 Accessibility</b>	<b>Obj 8 Business</b>
	++	-	++	++	++	++	++	++
<p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a greater positive impact on most of the objectives although it has a neutral impact on SO2. Whilst the development of the site does result in the loss of an employment site, this matter is addressed within the policy therefore it scores as having a positive impact on SO8.</p> <p><b>Recommend: To agree this is a policy that supports the sustainable objectives.</b></p>								

**Table Af Policy 6: Riverside Caravan Park, Upper Beeding**

<b>Final policy in Submission NP</b>								
<p>The Neighbourhood Plan supports the development of the site as shown on the Policies Map for 9 retirement housing units for residents over the age of 55. Any development should take account of the following:</p> <ol style="list-style-type: none"> <li>1. The FRA submitted with any planning application must be agreed by the EA.</li> <li>2. The finished floor levels of the development are to be set at no lower than 5.3 metres above Ordnance Datum (AOD).</li> <li>3. The development will need to include a flood evacuation plan to be agreed with Horsham District Council emergency planners.</li> <li>4. The development will need to incorporate flood mitigation measures such as barriers on ground floor doors, windows and access points. The means of a safe access to and from the site must be included within any proposal.</li> <li>5. The development must preserve or enhance the High Street Conservation Area and nearby listed buildings. Any building on this site should respond to and respect the scale and proportions of the historic dwellings visible from the key view point of the bridge when looking north and into the conservation area.</li> <li>6. There must be no detrimental impact on the public footpaths within or close to the site including during the construction phase.</li> <li>7. A landscaping scheme is to be submitted with the planning application. Any development will need to take into account the landscape impacts on the South Downs National Park.</li> <li>8. Any proposal must respect the amenities and privacy of adjoining dwellings/properties.</li> <li>9. Access to the site is to be agreed by West Sussex County Council Highway department. The impacts of the increase in traffic using Riverside would need to be demonstrated as part of any planning application. It is likely that improvements to Riverside will be needed. These are to be agreed with the County Council before an application is submitted.</li> <li>10. Design and layout of the development shall ensure the ecological and landscape value of the River Adur Water Meadows and Wyckham Wood Local Wildlife Site is not detrimentally harmed.</li> <li>11. A full ecological and biodiversity survey and written report of the site will be required to be submitted with a planning application.</li> <li>12. Any excavations arising from such a development and/or the construction of the development must not compromise the structural integrity of the flood defences along the River Adur.</li> <li>13. A drainage strategy detailing the proposed means of foul and surface water disposal must be submitted with a planning application.</li> </ol>								
<b>Policy 6 Options</b>	<b>Obj 1 Housing</b>	<b>Obj 2 Community Facilities</b>	<b>Obj 3 Biodiversity</b>	<b>Obj 4 Landscape</b>	<b>Obj 5 Heritage Assets</b>	<b>Obj 6 Flooding</b>	<b>Obj 7 Accessibility</b>	<b>Obj 8 Business</b>
	++	-	++	++	++	++	++	-
<p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed against the sustainability objectives. However, the policy as written is now assessed against the objectives. The policy scores as having a greater positive impact on most of the objectives although it has a neutral impact on SO2 and SO8. Whilst the site is an existing caravan park business, it is understood that part of this will remain.</p> <p><b>Recommend: To agree this is a policy that supports the sustainable objectives.</b></p>								

**Table Ag Policy 7: Further Care Home Provision at Valerie Manor, Henfield Road, Upper Beeding**

Final policy in Submission NP								
<p>The Neighbourhood Plan supports the development of the site as shown on the Policies Map for further care home provision to allow for up to 30 extra bedrooms. The new development should take account of the following:</p> <ol style="list-style-type: none"> <li>1. There is no adverse impact on the special architectural or historic character and appearance of the listed building known as Valerie Manor or its setting. The development must preserve or enhance the Hyde Street Conservation Area.</li> <li>2. The development does not adversely affect the landscape character of the South Downs National Park or have a detrimental visual impact on the National Park.</li> <li>3. A landscaping scheme is to be submitted with the planning application. The landscaping and green Infrastructure proposals for the site will need to provide a positive new edge of settlement at this location.</li> <li>4. There is no loss in car parking space and new spaces are provided in accordance with West Sussex County Council car parking standards.</li> <li>5. A statement is submitted with any application outlining the archaeological safeguards to be put in place to ensure the investigation and recording of ancient archaeological remains occurs before development begins.</li> <li>6. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park.</li> <li>7. A full ecological and biodiversity survey of the site is required and a written report to be submitted with a planning application.</li> <li>8. A Flood Risk Assessment report should be submitted with any application.</li> </ol>								
Policy 7 Options	Obj 1 Housing	Obj 2 Community Facilities	Obj 3 Biodiversity	Obj 4 Landscape	Obj 5 Heritage Assets	Obj 6 Flooding	Obj 7 Accessibility	Obj 8 Business
A	++	-	++	++	++	+	-	++
B	??	-	-	-	-	-	-	-
<p>Option A – To have a policy that sets out an appropriate location for the provision of care home facilities within the parish (final policy).                      Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p><b>Appraisal:</b> Option A scores as having a greater positive impact on SO1 as it brings forward a type of housing that is in need within the parish. It scores as having a slight positive impact on SO6 as whilst flooding is referenced, the outcome of a FRA is unknown. It scores as having a greater positive impact on SO8 as the site is an existing business that is highly regarded and the policy will enable this to expand and deliver a local need. This option has a neutral impact on accessibility which although the site is within walking distance of the village centre, this may not be possible for all residents. However, there are limited means to improve this situation through the implementation of the policy. Option B scores as having a negative impact on SO1 as it does not secure a particular site to cater for this identified need. Through depending on Development Plan policies and national planning guidance it is unlikely this type of development will come forward in the right location.</p> <p><b>Preferred option A.</b></p>								

**Table Ah Policy 8: Design Standards for New Development**

<b>Final policy in Submission NP</b>								
<p>The scale, density, massing, height, landscape design, layout and materials of all development proposals, including alterations to existing buildings, will be required to reflect the architectural and historic character and scale of the surrounding buildings. Within the South Downs National Park or its setting, proposals must adopt a landscape led approach and conserve its landscape character and natural beauty. In the areas adjoining the South Downs National Park, proposals must avoid any significant detrimental effect on its landscape and natural beauty.</p> <p>Development proposals will be expected to be in accordance with the Parish Design Statement 2017 and the following provisions:  <b>Style:</b> To specifically encourage individuality in appearance whilst retaining the general characteristics of local vernacular.  <b>Height:</b> Development should respect the rural setting and generally low rise characteristics of the Parish.  <b>Building materials:</b> Should reinforce the character and distinctiveness of the district’s environment through the use of traditional materials and techniques. Where brick is to be used, encourage the use of colours that compare with the older buildings in the village. To encourage the use of vertical tile hanging, again of appropriate colour. To specify pitched roofs, possibly of varying angles. That flint is used to provide some visual impact on an individual building or development.  <b>Visual impact:</b> Consideration should be given as to how any new development will fit into the wider landscape and whether it will impact on views from the National Park.  <b>Protection of Tree/Hedges –</b> Development will need to take into account the impact on existing trees/ hedges/ TPOs on the site or within the vicinity.  <b>Parking -</b> Off street parking should be considered for any development as well as space for cycle parking.  <b>Sense of Place -</b> Contribute to a sense of place both in the buildings and spaces between them – taking into account the density of the development around.  <b>Impact on neighbours -</b> Ensure that new development is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land.</p> <p><b>Drainage -</b> All new developments must clearly demonstrate the adoption of measures to minimise surface and roof water run-off.  <b>Sustainability -</b> Ensure buildings and spaces are orientated to gain maximum benefit from sunlight and can maximise natural daylight.</p>								
<b>Policy 8 Options</b>	<b>Obj 1 Housing</b>	<b>Obj 2 Community Facilities</b>	<b>Obj 3 Biodiversity</b>	<b>Obj 4 Landscape</b>	<b>Obj 5 Heritage Assets</b>	<b>Obj 6 Flooding</b>	<b>Obj 7 Accessibility</b>	<b>Obj 8 Business</b>
<b>A</b>	-	-	++	++	++	++	-	-
<b>B</b>	-	-	+	+	+	+	-	-
<p>Option A – To have a policy that sets out when development will be permitted in terms of design principles (final policy).          Option B –To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p><b>Appraisal:</b> Both options would seek to ensure that design is given due consideration. However, option A scores as having a greater positive impact on a number of objectives including biodiversity, landscape and flooding and heritage. Option B would not provide local context or local character and although it will have a positive impact on objectives 3, 4, 5 and 6. However, the extent of this is less than options A because of the more general nature of national and District wide policies compared to the local focus of Neighbourhood Plan policies.</p> <p><b>Preferred option A.</b></p>								

**Table Ai Policy 9: Community Facilities**

<b>Final policy in Submission NP</b>								
<p>The existing community facilities within Upper Beeding Parish are important resources for the local community and should be retained. These are shown on the Policies Map. Support will be given to allocating new facilities or improving existing ones. Proposals involving the loss of community facilities, for which there continues to be an established need, will be resisted unless adequate alternative provision is made available in a location supported by the local community within an appropriate and agreed timescale. In particular, the Parish Council is keen to support the following:</p> <ul style="list-style-type: none"> <li>• The Old School Building, Upper Beeding - retain and maintain as an educational facility only.</li> <li>• A properly equipped Sports Pavilion be erected on the playing field.</li> <li>• Public Toilets for the Memorial Playing Fields.</li> <li>• Creation of a community-owned, dedicated youth space.</li> </ul>								
<b>Policy 9 Options</b>	<b>Obj 1 Housing</b>	<b>Obj 2 Community Facilities</b>	<b>Obj 3 Biodiversity</b>	<b>Obj 4 Landscape</b>	<b>Obj 5 Heritage Assets</b>	<b>Obj 6 Flooding</b>	<b>Obj 7 Accessibility</b>	<b>Obj 8 Business</b>
<b>A</b>	-	++	-	-	-	-	-	-
<b>B</b>	-	-	-	-	-	-	-	-
<p>Option A – To have a policy that sets out when development will be permitted in terms of design principles (final policy).                      Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p><b>Appraisal:</b> Option A has a greater positive impact on SO2. It is unlikely that policies within the Development Plan and national policy will focus on the importance of community facilities within Upper Beeding parish.</p> <p><b>Preferred option A</b></p>								

**Table Aj Policy 10 Employment Sites and Supporting Businesses**

<p><b>Final policy in Submission NP</b></p> <p>Proposals that result in the loss of an existing employment site will only be permitted where it is demonstrated that its continued use is no longer viable; unless the site relates to a site specific policy within the Neighbourhood Plan. Proposals to expand an existing employment or business use will be supported, provided there is minimal impact on flood risk, local amenity, traffic, noise and surrounding landscape and other special qualities of the National Park. Existing business parks/industrial areas will be protected from change of use or redevelopment. These are shown on the Policies Map and include:</p> <ul style="list-style-type: none"> <li>• Mackleys Business Park, Small Dole</li> <li>• Golding Barn Industrial Estate, Small Dole</li> <li>• Newbrook Works, Pound Lane, Upper Beeding</li> <li>• The Courtyard, Shoreham Road, Upper Beeding</li> <li>• Beeding Court Business Park</li> </ul> <p>Support will be given to the diversification of the use of farm buildings for communities and rural businesses provided the scheme complies with all policies in the Neighbourhood Plan and other statutory planning documents. Measures to promote the tourism and the retail offer of both villages will be supported.</p>								
Policy 10 Options	Obj 1 Housing	Obj 2 Community Facilities	Obj 3 Biodiversity	Obj 4 Landscape	Obj 5 Heritage Assets	Obj 6 Flooding	Obj 7 Accessibility	Obj 8 Business
A	-	-	-	+	+	+	+	++
B	-	-	-	-	-	-	-	+
<p>Option A – To have a policy that focuses on supporting businesses and employment sites (final policy).          Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p><b>Appraisal:</b> Both policies score the same SO8 – they both have a positive impact on the objective. However, Option A has a greater impact as the policy as written specifically relates to Upper Beeding and references existing employment areas. It is unlikely that policies within the Development Plan and national policy will focus on the importance of employment and business within Upper Beeding parish.</p> <p><b>Preferred option A</b></p>								

**Table Ak Policy 11 Local Green Spaces**

<p><b>Final policy in Submission NP</b></p> <p>The following sites are designated as Local Green Space and are shown on the Policies Map:</p> <ul style="list-style-type: none"> <li>Hyde Street Green, BN44 3TT</li> <li>Pepperscombe Lane, BN44 3HS</li> <li>Part of Priory Fields Green, BN44 3HU</li> <li>St Peter’s Green &amp; floodplain, BN44 3HX</li> <li>Saltings Field, BN44 3JH</li> <li>Small Dole Playground, BN5 9XE</li> </ul> <p>No new development shall take place on the areas designated as Local Green Space other than in very special circumstances such as:</p> <p>(i) Works needed to maintain an existing structure on the Local Green Space; or</p> <p>ii) Works needed for statutory utility infrastructure purpose; or</p> <p>(ii) Where the proposed development will be for the benefit to the community and will not detrimentally impact on the particular local significance of the space.</p>								
Policy 11 Options	Obj 1 Housing	Obj 2 Community Facilities	Obj 3 Biodiversity	Obj 4 Landscape	Obj 5 Heritage Assets	Obj 6 Flooding	Obj 7 Accessibility	Obj 8 Business
A	-	++	++	+	-	-	-	-
B	-	?	?	?	+	+	+	+
<p>Option A - To have a policy that sets out the sites to be allocated as local green spaces (final policy).</p> <p>Option B – To not have a policy and rely on the National Planning Policy Framework regarding advice on Local Green Spaces.</p> <p><b>Appraisal:</b> Option A is the culmination of extensive background research undertaken by the steering group. This policy has been assessed as having a greater positive impact on a number of objectives. The spaces have been assessed as being appropriate to include in the policy as judged against the criteria in the NPPF. Option B has been assessed as having a slight negative impact on objectives 2, 3 and 4. Whilst there could be an opportunity to include allocations for local green spaces within any review of the Horsham District Planning Framework, this is not guaranteed and it is unlikely a District wide document would include such allocations for each parish. Therefore – without specific allocations within NPs, there are no opportunities to protect these areas as green spaces of value to the local community.</p> <p><b>Preferred option A</b></p>								

# **APPENDIX F**

## **Table of all policies assessed**

**Table B – Assessment of all sites as amended**

POLICY NUMBERS	Obj 1 Housing	Obj 2 Community Facilities	Obj 3 Biodiversity	Obj 4 Landscape	Obj 5 Heritage Assets	Obj 6 Flooding	Obj 7 Accessibility	Obj 8 Business
Policy 1	++	++	++	++	++	-	+	+
Policy 2	+	-	-	-	-	-	-	-
Policy 3	++	-	++	++	++	++	++	-
Policy 4	++	-	++	++	-	-	++	-
Policy 5	++	-	++	++	++	++	++	++
Policy 6	++	-	++	++	++	++	++	-
Policy 7	++	-	++	++	++	+	-	++
Policy 8	-	-	++	++	++	++	-	-
Policy 9	-	++	-	-	-	-	-	-
Policy 10	-	-	-	+	+	+	+	++
Policy 11	-	++	++	+	-	-	-	-