

Hassocks Neighbourhood Plan
Sustainability Appraisal (incorporating Strategic
Environmental Assessment)
Non-Technical Summary



June 2019

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1. INTRODUCTION

- 1.1. This Sustainability Appraisal (incorporating Strategic Environmental Assessment) Non-Technical Summary has been prepared in support of the Hassocks Neighbourhood Plan (HNP).
- 1.2. It provides a a non-technical summary of the information within the Sustainability Appraisal (SA) main report.

2. HASSOCKS NEIGHBOURHOOD PLAN

- 2.1. Mid Sussex District Council (MSDC) designated the whole of the Parish, including Keymer and Clayton, for the purposes of neighbourhood planning on the 16 July 2012.
- 2.2. Given part of the Parish lies within the SDNP, the South Downs National Park Authority (SDNPA) also designated the Parish in September 2012.
- 2.3. The HNP has been prepared by Hassocks Parish Council (HPC) in accordance with the Neighbourhood Planning (General) Regulations 2012.
- 2.4. The first Regulation 14 Pre-submission HNP and accompanying SA were submitted to MSDC in June 2016. Regulation 16 consultation followed between July-September 2016.
- 2.5. However, the Submission HNP (June 2016) was not progressed to Examination. In light of feedback from the ongoing examination of the Mid Sussex District Plan (MSDP), in particular with respect to the overall level of housing need, MSDC determined that the Submission HNP should not proceed to Examination. Progress of the HNP was paused, pending the final adoption of the MSDP, which occurred in March 2018.
- 2.6. Following this, and in light of a meeting with MSDC Officers, HPC resolved to progress a 'light touch' review of the HNP.¹
- 2.7. The Submission Plan has been prepared following extensive background work and publication of a second Regulation 14 Pre-submission HNP, which was the subject of public consultation in early 2019.
- 2.8. This HNP reflects the culmination of work by the NPWG since the Parish was designated for neighbourhood plan making in July 2012. It builds upon the evidence gathering, stakeholder engagement and plan preparation that took place in formulating the initial version of the HNP. It sets out the Vision, the Strategic Objectives and will guide and influence development in the Parish up to 2031.

¹ See minutes of NPWG meeting on 27 June 2018

3. SUSTAINABILITY APPRAISAL

- 3.1. A SA is a systematic process to promote sustainable development by assessing the extent to which a Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.²
- 3.2. It is a process to consider ways by which a Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse impacts that the Plan might otherwise have. By doing so, it can help ensure that the proposals in the Plan are the most appropriate, given reasonable alternatives. Sustainability Appraisals are an iterative process, informing the development of the Plan.
- 3.3. There is no legal requirement for a neighbourhood plan to have a sustainability appraisal as set out in section 19 of the Planning and Compulsory Purchase Act 2004. However, a Qualifying Body must demonstrate how its plan or order will contribute to achieving sustainable development. Government guidance advises a sustainability appraisal may be a useful approach for demonstrating how their draft plan or order meets this Basic Condition.³
- 3.4. A Strategic Environmental Assessment (SEA) involves the evaluation of the environmental impact of a Plan or programme. It is a requirement, as set out in the European Directive 2001/42/EC. It has been enacted into UK Law through the Environmental Assessment of Plans and Programmes Regulations 2004.
- 3.5. The NPPG advises a Neighbourhood Plan may require an environmental assessment if it is likely to have a significant effect on the environment. Where this is the case the draft neighbourhood plan may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004. Guidance advises this may be the case, for example, where a Neighbourhood Plan allocates sites for development.⁴
- 3.6. Having regard to the legislative obligations and Government guidance, HPC have resolved to undertake a Sustainability Appraisal that incorporates a Strategic Environmental Assessment. Where reference is made in this report to a Sustainability Appraisal, it includes the incorporation of a Strategic Environmental Assessment).

4. SCOPING REPORT

- 4.1. Government guidance advises the Scoping Report must identify the scope and level of detail of the information to be included in the environmental report. It should set out the context, objectives and approach of the assessment; establish the baseline; and identify relevant environmental issues and objectives. A key aim of the scoping procedure is to help ensure the

² Paragraph: 001 Reference ID: 11-001-20140306

³ Paragraph: 026 Reference ID: 11-026-20140306

⁴ National Planning Policy Guidance: Paragraph: 073 Reference ID: 41-073-20140306

strategic environmental assessment is proportionate and relevant to the neighbourhood plan being assessed.⁵

4.2. In light of Government Guidance, the Scoping Report sets out the:

- ▶ Background to the meaning of sustainable development;
- ▶ Vision and objectives of the HNP;
- ▶ Sustainability Appraisal methodology

In addition, it set out

- ▶ Relevant policies, Plans, programmes and environmental protection objectives;
- ▶ Evidence baseline information;
- ▶ Issues, problems and trends; and
- ▶ Proposed sustainability objectives and indicators (known as the Sustainability Framework)

4.3. The Scoping Report confirmed the Sustainability Appraisal will consider the effects of the HNP against reasonable alternatives, using a series of objectives and indicators.

4.4. The Sustainability Appraisal will identify objectives that cover the 3 limbs of sustainability, i.e. Environmental, Social and Economic. These will be capable of being measured against a set of indicators. Collectively, the sustainability objectives and the indicators are known as the Sustainability Framework. These will be used to ensure that the policy options selected in the HNP contribute to the overarching aim of sustainable development.

4.5. It is proposed that the performance of the policy options are measured against the objectives as follows:

✓✓	Significant positive impact on the sustainability objective
✓	Positive impact on the sustainability objective
?✓	Possible positive or slight positive impact on the sustainability objective
0	No impact or neutral impact on the sustainability objective
?✗	Possible negative or slight negative impact on the sustainability objective
✗	Negative impact on the sustainability objective
✗✗	Significant negative impact on the sustainability objective

⁵Paragraph: 034 Reference ID: 11-034-20150209

- 4.6. The Sustainability Objectives have been informed by the appraisal of the identification of other relevant policies, Plans, programmes and environmental protection objectives, the collection of baseline information, and the identification of sustainability issues and problems. The latter have, in part, been established from the results of the initial evidence gathering and stakeholder engagement and with regard to the Sustainability Framework of the Mid Sussex District Plan.
- 4.7. Based on this, the sustainability objectives and indicators (the Sustainability Framework) of the HNP are as follows:

Theme	Objective
Environmental	Objective 1 - Countryside And Landscape Character
Environmental	Objective 2 - Ecology
Environmental	Objective 3 - Heritage Assets
Environmental	Objective 4 - Water & Flooding
Environmental	Objective 5 - Climate Change
Environmental	Objective 6 - Transport
Social	Objective 7 - Housing
Social	Objective 8 - Crime
Social	Objective 9 - Sustainable Transport Patterns
Social	Objective 10 - community Infrastructure
Economic	Objective 11 - Economy
Economic	Objective 12 - Wealth
Economic	Objective 13 - Retail

- 4.8. The Scoping Report and baseline data was subject to public consultation with statutory bodies (English Heritage, Natural England, the Environment Agency) in August 2018 for a five week period.
- 4.9. In response to the consultation, the Environment Agency were supportive of the inclusion of Objective 2:Ecology, Objective 4:Water and flooding, Objective 5:Climate Change and associated indicators.
- 4.10. In response to the Scoping Report, Natural England recommended:
- HPC assess local biodiversity data to establish trends in biodiversity across the Parish. In addition, Natural England recommend in order to highlight the importance of biodiversity,

the opportunity to protect biodiversity is included as part of the opportunity to enhance biodiversity.

- HPC evaluate the likely impacts of development on biodiversity and update the threats list accordingly.
- Further exploration of the landscape challenges imposed by development could be referenced.
- Opportunities listed include opportunities to educate residents of the importance of the designated and non-designated landscape features to be included.
- Opportunities to conserve Best and Most Versatile agricultural land are identified.
- Challenges associated with connecting people to nature should also be explored. Access and green infrastructure should be included as a key issue and can be linked to recreation, health and quality of life.
- Challenges associated with supporting wildlife and residents in the face of climate change be explored. Opportunities to create high quality green infrastructure within the Parish should be explored to contribute to tackling the impacts of climate change on residents and biodiversity.

4.11. No feedback was received from Historic England.

5. PRE-SUBMISSION SUSTAINABILITY APPRAISAL OF THE HASSOCKS NEIGHBOURHOOD PLAN

5.1. The Pre-submission SA set out:

- An appraisal of the SA(inc SEA) methodology;
- A summary of the baseline information, identification of the plans, policies and programmes that have an impact on the HNP (with updates) and a summary of the challenges for the future of the Parish;
- The Sustainability Framework - Objectives and indicators;
- An appraisal of policy options; and
- Next steps.

5.2. With respect to the Sustainability Framework this has emerged through careful appraisal of relevant International, National, Regional, District and Local Plans and Programmes, the collection of baseline data, local knowledge of sustainability challenges faced in the Parish and a SWOT analysis.

5.3. In light of comments received from Natural England, the indicators with respect to: Objective 1- Countryside and Landscape Character; Objective 2 - Ecology; Objective 4 - Water and Flooding; Objective 5-Climate Change have been updated (where appropriate).

- 5.4. The Environment Agency supports the inclusions of Objective 2- Ecology, Objective 4-Water and Flooding and Objective 5 - Climate Change.
- 5.5. The Pre-submission SA assessed the Strategic Objectives of the HNP for compatibility with the 13 Sustainability Objectives. This confirmed the HNP Strategic Objectives and the Sustainability Objectives are compatible or have a neutral impact. This exercised indicated that the HNP is being prepared positively with the aim of solving some of the sustainability issues identified and that the Sustainability Objectives are appropriate to measure the extent to which it achieves this.
- 5.6. In addition, a comparative assessment has been undertaken of the policies to test their mutual compatibility. This exercise has confirmed that most policies are either compatible or have a neutral impact. Where policies are not compatible, this is where the allocation of land for development is set against those that are focused on conserving and enhancing the environment. In such situations, the SA identifies the most suitable option, having regard to all of the Sustainability Objectives. In recommending the preferred policy option, weight is placed on the Sustainability Objectives most closely linked with the specific policy being appraised.
- 5.7. In order to meet the Strategic Objectives of the HNP and address some of the challenges facing the Parish, a range of policy areas and aims were selected for inclusion within the HNP. These were appraised as part of the Pre-submission SA to determine whether they have a positive or negative impact, using the Sustainability Framework.
- 5.8. A range of policy areas and aims have been considered and a range of options for each policy have been identified
- 5.9. All policy options and aims have been appraised, to assess the impact on the 13 Sustainability Objectives set out in the Sustainability Framework.
- 5.10. The overall appraisal ensures that the policies and aims selected and taken forward in the HNP are the most sustainable, given reasonable alternatives.
- 5.11. As part of the policy appraisal, the overall growth strategy options of the HNP were tested against the sustainability objectives. The appraisal details three options which were considered by HPC for the overall growth of the Parish. These were:
- **Option A:** To have a strategy that does not support further housing growth beyond existing completions and commitments - to reflect the table on page 36 of the MSDP;
 - **Option B:** To have a strategy that supports for small-scale growth/windfall within and adjoining the built up area boundary subject to HNP criteria and in line with MSDP DP6: Settlement Hierarchy; and
 - **Option C:** To have a strategy which allocates sites beyond existing completions and commitments in excess of the minimum 882 dwellings required by the MSDP.
- 5.12. Option B is considered most favourable. It would enable small-scale growth/windfall within and adjoining the existing built up area boundary of Hassocks, subject to criteria identified in the HNP and MSDP Policy 6. This would facilitate the positive delivery of additional housing within the Parish which would have a positive effect on the social and economic objectives. It would also ensure

adverse impact on environmental objectives would be minimised and mitigated. This option thus provides the most balanced positive option against the range of objectives.

- 5.13. The Pre-submission SA was consulted on alongside the Pre-submission HNP for a 6 week period from 07 January 2019 - 18 February 2019.

6. REPRESENTATIONS MADE IN RESPONSE TO THE REGULATION 14 PRE-SUBMISSION SA

- 6.1. In response to consultation on the Pre-submission HNP and accompanying SA, circa 63 responses were received.
- 6.2. A total of 4 representations were received in respect of the SA from:
- Natural England;
 - Historic England; and
 - Landowner/agents X2.

Natural England

- 6.3. Natural England (NE) commented on the SA Scoping Report and noted their previous comments on 'Stage A3 – Identify Sustainability Issues and Problems', have been acknowledged, but were unclear how the comments will be implemented into the HNP.
- 6.4. In addition, NE advised they were pleased the majority of comments on 'Stage A4 - Developing the sustainability appraisal framework' had been incorporated into the objectives.

Historic England

- 6.5. Historic England advised it was considered the potential impact to the Parish's Heritage Assets is not noted in the Sustainability Appraisal which appears to have been prepared without reference to the County Historic Environment Record. Consider this problematic and suggests an incomplete and unreliable assessment.
- 6.6. In response to comments received, it was confirmed the SA includes Objective 3: Heritage. The strategy, policies and aims of the HNP have been assessed against this objective.

Landowner/Agent

- 6.7. Two comments were received from landowners/agents:
- Evison & Company; and
 - Lewis & Co Planning.
- 6.8. Representations from Evison & Company and Lewis & Co advised they considered, amongst other things that the SA failed to consider reasonable alternatives to the allocated sites.

- 6.9. They comment that Land at London Road, Hassocks is adjacent to land allocated for housing. They consider both sites have the same environmental characteristics. Therefore had the land been assessed according to the same criteria as those used for this adjacent site, it appears likely that it too would have been assessed favourably. They assert that a failure to undertake this assessment is a fundamental flaw in the NP's site selection procedure.
- 6.10. In response to these comments it is noted that at the time of preparing the Regulation 14 Pre-Submission HNP (January 2019), the higher tier MSDP had been adopted, and amongst other things, planning permission had been granted for residential development on land to the west of London Road, initially for 97 dwellings via a planning appeal and subsequently for an increase to 129 dwellings under an application approved by Mid Sussex District Council in July 2018.
- 6.11. The SA undertook an appraisal of reasonable alternatives of the overall housing strategy of the HNP. It concluded that a strategy that supports further small scale growth beyond existing completions and commitments, comprising windfall development within and adjoining the built-up area boundary subject to criterion in line with Policy MSDP 6: Settlement Hierarchy, scored most favourably against the SA objectives. The SA complied with the statutory requirements of considering reasonable alternatives for the housing strategy of the Plan.
- 6.12. The chosen strategy would facilitate delivery of an overall housing number in the parish over the plan period, that is beyond the minimum requirement set out within the District Plan (882 dwellings over the Plan period).
- 6.13. In acknowledging the housing requirements set out in the District Plan, and that this quantum of development would be facilitated through a mix of existing planning permissions, and a strategic allocation, the SA concluded that the most appropriate strategy for the HNP, did not include the need to make further housing land allocations within the Neighbourhood Plan. The SA considered the delivery of additional further development through "windfall" would be most favourable when assessed against the objectives.
- 6.14. The sites allocated for housing development within the HNP either benefit from planning permission or are allocated for development within a higher tier document (i.e. Policy 15, 16 and 17 of the Regulation 14 HNP January 2019). The SA assessed the merit of policies which support these developments in line with the vision and objectives of the HNP, against the reasonable alternative of not having such policies. This approach reflects the SA procedural requirements.

7. SUBMISSION SUSTAINABILITY APPRAISAL OF THE HASSOCKS NEIGHBOURHOOD PLAN

- 7.1. As a result of the overall feedback received in response to the Regulation 14 Pre-submission consultation, a number of minor amendments were made to the HNP to strengthen and clarify policies and to ensure alignment with adopted District Plan policies although no substantive changes have been made to the Policies or Aims. Consequential minor amendments were also made to the SA.
- 7.2. The Submission HNP and accompanying documents including the SA were finalised during May-June 2019.