

Petworth Neighbourhood Plan: Focused Changes

Sustainability Appraisal

Incorporating Strategic Environmental Assessment

February 2018

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Appendix 1: SA Objectives

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1.0 Introduction

- 1.1 The purpose of this Focused Changes Sustainability Appraisal document (“the Focused Changes SA document”) is to consider the Independent Examiner’s recommended changes to:
 - (a) Extend the settlement boundary to include the Grain Dryer site (Site PW18) and extend the boundary to the east to include the access drive to the south of the grain dryer building.
 - (b) Include the Land south of Rothermead site (Site PW19) as a housing allocation within the Petworth Neighbourhood Plan.
- 1.2 Recommended change (a) relates principally to Policy PP1 and recommended change (b) relates to both Policy H1 as this policy allocates the quantum and location of the housing sites, and new recommended Policy H8 which provide site specific policy detail.
- 1.3 Sustainability Appraisal (incorporating Strategic Environmental Assessment) is an iterative process that assesses the policies of the Petworth Neighbourhood Plan against an agreed set of Sustainability Appraisal Objectives (SA objectives). A copy of the SA objectives are included within **Appendix 1**.
- 1.4 Against the SA objectives, the principal aim of this Focused Changes exercise is to understand whether the recommended changes would have negative or positive environmental, social or economic impacts. This will show whether the Petworth Neighbourhood Plan continues to have a sustainable approach in light of the recommended changes.
- 1.5 If as a consequence of the recommended changes negative effects are identified then measures would need to be identified which would avoid, or mitigate the negative effect of the policy change(s).
- 1.6 A final Petworth Neighbourhood Plan Sustainability Appraisal will be published alongside the final ‘made’ Neighbourhood Plan in due course.

2.0 The Sustainability Framework and the Focused Changes

2.1 This section appraises the recommended policy changes and predicts the significance of the impact upon the Sustainability Objectives of the SA framework. The significance assessment applies the 'significant positive' to significant negative' impact range methodology set out within the Table below.

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

Policy PP1: Settlement Boundary

Focused Change Policy Refinement

2.2 Extend the settlement boundary on Figure 3 of the Petworth Neighbourhood Plan to include the whole of the Grain Dryer site (Site PW18) and extend the boundary to the east to include the access drive to the south of the grain dryer building. The purpose of this focused change is to ensure that the boundary of the Grain Dryer site and the vehicular access is not subdivided between being partly within and partly outside of the defined settlement boundary. The allocation of adjoining land south of Rothermead is assessed in the subsequent two sections.

Summary of the Options:

- 2.3 To include a policy that redefines the existing settlement boundary to include sites allocated within the Neighbourhood Plan and sets out that development outside the redefined settlement boundary will be resisted. Alternatively, reliance on the strategic policies within the Saved policies of the Chichester District Local Plan First Review, the emerging South Downs National Park Local Plan, the National Planning Policy Framework, and guidance within the Planning Practice Guidance.
- 2.4 The Focused Change is broadly the same as the Settlement Boundary option but with a minor amendment to ensure that all of the Grain Dryer site (PW18) is included within the Settlement Boundary.

Site Option Policy Alternatives	Sustainability Appraisal Objectives												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Settlement boundary	+	0	0	?	0	0	0	0	0	0	0	0	0
No policy	-	0	0	?	0	0	0	0	0	0	0	0	0
Focused Change: Inclusion of the Grain Dryer site (PW18) within the settlement boundary	+	0	0	?	0	0	0	0	0	0	0	0	0

Recommended Option:

- 2.5 To include an amended policy that redefines the settlement boundary within Figure 3 to include all of the Grain Dryer site and the access drive to the south of the grain dryer building.

Assessment Comment:

- 2.6 Both settlement boundary policy options scored more positively against the objectives for landscape and largely neutral across the remaining objectives. However, the Focused Change Option that ensures the Grain Dryer site is not subdivided by the defined settlement boundary is the preferred option as this helps achieve policy consistency for the site as a whole. The Focused Change applies the logical planning unit boundary for the Grain Dryer site. The change made is principally to address a cartographical drafting issue.

Why were the other Option(s) rejected?

- 2.7 The 'No policy' option was rejected as it provided less policy protection against inappropriate development outside the settlement boundary. This could potentially harm the objective of conserving and enhancing the landscape. The Submission Draft Settlement Boundary option was rejected as it was identified that the option, as drafted, inadvertently subdivided Grain Dryer site which could result in confusion and a lack of clarity.

Policy H1: Allocate land for at least 150 net additional new homes

Policy Refinement

- 2.8 In the title replace "approximately" with "at least" and in Table 5.1 add a further row "H8 – Land south of Rothermead – 10 dwellings" and change the total at the bottom of the table to "163 dwellings".
- 2.9 The title change is not considered to have significantly changed the policy approach or policy outcome as the overarching spatial strategy within the Neighbourhood Plan has always been to deliver at least 150 new homes over the period up to 2033. The wording change is not going to materially increase the level of new housing delivered at Petworth over the period up to 2033. Indeed the Neighbourhood Plan, the emerging South Downs National Park Local Plan and the National Planning Policy Framework all contain strong policy protections against development outside of defined settlement boundaries within National Parks. However, the option to allocate additional land for development is considered to have potential implications and has therefore been subjected to appraisal against the SA Objectives.

Summary of the Options:

- 2.10 Informed by the Site Assessment process, to ensure delivery of at least 150 new dwellings, three alternative sites options were developed – each of which comprising sufficient housing land potential capacity to deliver at least 150 new dwellings. These options being:

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

Option 2: Sites PW18, PW19, PW21 and PW26.

Option 3: Sites PW01, PW03 and PW05.

2.11 Informed by the illustrative masterplan process the land associated with Option 1 was amended to include a small western portion of Site PW30 and a de minimis portion of Site PW32. This Option is referred to as Refined Option 1: Sites PW23, PW24, PW25 and PW31.

2.12 In response to the Examiner's review of the Submission Neighbourhood Plan against the Basic Conditions prescribed by legislation, it was recommended that in addition to the Refined Option 1 sites, Site PW19 – land south of Rothermead should also be allocated for residential development comprising approximately 10 dwellings. Collectively this further option of housing allocations is referred to as Focused Changes Option: Sites PW23, PW24, PW25, PW31 and PW19. A plan showing the Focused Changes Option Sites is included as **Appendix 2**.

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

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

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

Recommended Option:

- 2.14 The recommended option is the Focused Change Option, which principally comprises Sites PW19, PW23, PW24, PW25 and PW31, but also includes a small western portion of Site PW30 and what is considered to be a de minimis portion of Site PW32

Assessment Comment:

Options

- 2.15 The five-policy options and the individual whole sites within the options performed relatively positively with no significant negative impacts identified.
- 2.16 All options result in a negative outcome associated with having an impact on landscape character (Objective 1), principally due to the unavoidable requirement to deliver housing on greenfield sites. Option 1, Refined Option 1 and the Focused Changes Option are considered the more preferable options against this objective as delivery of a new access road to the Primary School via the southern sites would enable development on a longstanding previously developed land site within the existing settlement boundary (PW25).
- 2.17 Although the Refined Option 1 includes a small element of additional greenfield land to Option 1 and therefore a greater potential landscape impact, the overall assessment outcome of these two options is the same against Objective 1. The reason being that drawing on the principles set out in the design and landscape led illustrative masterplan will help ensure that landscape impacts associated with development will be mitigated or reduced, particularly over the medium to long term.
- 2.18 Similarly, as confirmed within the Petworth landscape assessment, the potential negative landscape impacts associated within Option 2 and 3 could be appropriately mitigated by measures put in place at the planning application stage. These measures would reduce and / or mitigate negative impacts, particularly over the medium to longer term.
- 2.19 The Focused Changes Option comprises the greatest proportion of greenfield land and therefore greatest potential negative landscape impact of all the options. However, like the other greenfield sites negative landscape impacts associated within any housing development on Site PW19 could be appropriately mitigated by measures put in place at the planning application stage. These measures would reduce and / or mitigate negative impacts, particularly over the medium to longer term. Furthermore, like Refined Option 1 a landscape buffer along the southern edge of Petworth has the potential to soften the transition from countryside to urban form.
- 2.20 All options were considered to have a neutral outcome against Objectives 2 and 3, which seek to prepare Petworth for the effects of climate change and seek to address climate change. Whilst residential development could result in increased emissions of greenhouse gases, policies are

proposed within the Neighbourhood Plan, which seek to deliver sustainable design measures (Policy ESD8). The measures proposed include the construction of low carbon developments.

- 2.21 Similarly, all options were considered to have uncertain outcomes against the extent to which development would conserve and enhance biodiversity (Objective 4). No site within any of the options have any international, national or local biodiversity designations. Although greenfield land will be developed, the majority of the greenfield land is actively managed agricultural land and is therefore likely to have limited existing biodiversity potential. Furthermore, the greenfield sites within each option would deliver large areas of landscaping, informal open space and new green corridors all of which have the potential to provide positive biodiversity benefits. Residential gardens also have the potential to create greater biodiversity opportunities in comparison to actively managed agricultural land.
- 2.22 Option 3 was considered to have potentially greater potential negative outcomes associated with impact on the character and setting of the Petworth Conservation Area (Objective 5). Under Option 3, all sites abutted the Conservation Area boundary, whereas only one site within Option 1, Refined Option 1, Focused Changes option; and Option 2 abut the Conservation Area.
- 2.23 All options were considered to have a neutral outcome against Objective 6, which seeks to improve the health and well-being of the population and reduce inequality in health and well-being as no site would increase or decrease health, well-being or community facilities within Petworth.
- 2.24 Against improving accessibility to educational services (Objective 7) and improving the efficiency and safety of the transport network (Objective 8), it was considered that Option 1, Refined Option 1 and Focused Changes Option scored positive to significant positive outcomes. The principal reason being that under these options a new access road to the Primary School can be delivered (via a comprehensive development on Sites PW23 and PW31 (Option 1) or via Sites PW23, PW31 and a small portion of PW30 and PW32 (Refined Option 1 and Focused Changes Option)). This new access road will help address local highway capacity issues associated with the schools existing access arrangement (namely capacity of the Dawtrey Road / Station Road roundabout during school drop-off and pick-up periods). A new car park and drop-off area would also be provided that would potentially have the benefit of helping to improve pedestrian and cycle safety.
- 2.25 Option 2 was considered to achieve a positive outcome against Objective 7 and 8 as all of the sites are within an acceptable and easy walking and cycling distance to key community facilities and services.
- 2.26 Option 3 was considered to achieve a negative outcome against Objective 7 and 8 as although the sites are within an acceptable walking distance to key community facilities and services the route involves in places, very narrow footpaths. As a result it was considered that this might encourage the use of private vehicle trips to and from the town centre.
- 2.27 All options were considered to have a positive outcome against Objective 9, as all options would contribute to the delivery of good quality, affordable homes which are suitable to current and future

Petworth resident needs. Likewise, as all options would potentially provide the same level of new affordable homes (approximately between 60 and 65 affordable homes (40% of 150 and 163 dwellings)) and will therefore broadly achieve the same positive outcomes against Objective 11 which seeks to reduce levels of deprivation within Petworth.

- 2.28 All options were considered to have neutral outcome against Objective 10 and 13 as none of the housing site options would provide new employment land or tourist sector related development.
- 2.29 All options comprise land that is wholly Flood Risk Zone 1 so therefore were considered to achieve the same positive outcome against Objective 12, which seeks to minimise flood risk for new and existing development. All greenfield sites within the Options would achieve greenfield run off rates through the delivery of sustainable urban drainage systems.

Individual Sites

- 2.30 Site PW25 was considered to achieve a significant positive against Objective 1 as this was the only previously developed site within the existing urban area of Petworth. The assessment of Site PW18 has been amended from a positive outcome to a neutral / unknown outcome following a post submission update to the Site Assessment of this site. Although this site contains existing built development (the grain dryer building), the building is associated with agricultural use and therefore not technically classed as previously developed land. However, whilst not previously developed land in the strict planning definition, the site is located within the existing defined urban area of Petworth and the buildings on the site are considered locally to detract from the landscape quality. In view of this, any redevelopment of the site could have a neutral or positive outcome through the removal of poor quality built form. As any positive outcome would be subject to the development proposed and design matters, only an uncertain outcome can be concluded.
- 2.31 All other sites PW23, PW24, PW31, PW19, PW21, PW26, PW01, PW03, PW04 and PW05 were all considered to have a negative outcome against Objective 1 as they are all wholly greenfield sites or are predominantly greenfield sites and are devoid or predominantly devoid of any built development. However, although these sites have the potential to have a negative landscape outcomes, it was considered that all sites could incorporate design, layout and landscape measures to either reduce and / or mitigate negative impacts, particularly over the medium to long term.
- 2.32 All site were considered to achieve neutral outcomes against Objective 2, 3, 6, 10 and 13. Whilst residential development could result in increased emissions of greenhouse gases, policies are proposed within the Neighbourhood Plan, which seek to deliver sustainable design measures (Policy ESD8). The measures proposed include the construction of low carbon developments. No site was considered to increase or decrease health, well-being or community facilities within Petworth. Similarly, no site would include new employment land or tourist sector related development.

- 2.33 All sites were considered to have an uncertain outcome against Objective 4, which seeks to conserve and enhance biodiversity within Petworth. None of the sites have any international, national or local biodiversity designations. Any small pockets of biodiversity value identified on sites as part of the development management process, such as the Old School Pond within Site PW25, could be conserved through design and layout measures as part of any redevelopment proposal. The southern sites are currently in intensive agricultural use and therefore have limited biodiversity value. Landscape led development proposals along with residential gardens has the potential in achieve net biodiversity gains on the southern sites. Similarly there is potential to increase biodiversity value on site PW19 through landscape measures and residential gardens.
- 2.34 Sites PW23, PW25, PW31, PW18, PW19, PW21 and PW01 were considered to have a neutral outcome against Objective 5 which seeks to conserve and enhance the historic environment as development on these sites would not enhance or harm known heritage assets. Sites PW24, PW26, PW03, PW04 and PW05 were considered to have a negative outcome as these sites about the Petworth Conservation Area. Development on these sites could have a negative impact on the setting and character of the Conservation Area. Although design could potentially help to reduce and / or mitigate any impact.
- 2.35 All sites were considered to achieve an uncertain outcome against Objective 6, which seeks to improve the health and well-being of the population and reduce inequalities in health and well-being. The reason being that no site would increase or decrease health, well-being or community facility provision within Petworth.
- 2.36 Sites PW23, PW31, PW24, PW25, PW18, PW19, PW21, and PW26 are considered to achieve positive outcomes against Objectives 7 and 8 which seek to improve accessibility to community facilities and improve the efficiency and safety of transport networks. All of these sites are within an acceptable and safe walking and cycling distance from key community facilities and services. Sites PW01, PW03, PW04 and PW05 were considered to achieve a negative outcome as although the sites are within an acceptable walking distance to key community facilities and services the route involves in places very narrow footpaths. As a result, it was considered that this might encourage the use of private vehicle trips to and from the town centre.
- 2.37 All sites were considered to achieve a positive outcome against Objectives 9, 11 and 12. All sites would help deliver new housing to meet the needs of existing and new residents. New housing would also comprise affordable housing, which will help reduce deprivation levels within Petworth. All sites are wholly Flood Risk Zone 1.

Why were the other Option(s) rejected?

- 2.38 Option 2 and 3 were rejected as Option 1, Refined Option 1, and Focused Changes Option were considered, as referred above, to achieve a more positive outcome against the Sustainability Appraisal objectives, particularly against objectives 7 and 8, which seek to improve accessibility to community services and to improve the efficiency and safety of transport networks.

2.39 Although Refined Option 1 includes a small element of additional greenfield land to Option 1 and the Focused Changes Option includes an even greater element of additional greenfield land to Option 1 and Refined Option 1, the overall assessment considered that the options achieved broadly the same landscape outcomes. Overall, Option 1 was rejected, as it did not full align with the principles set out within the illustrative masterplan. The Refined Option 1 was rejected as the addition of Site PW19 within the Focused Changes Option helps to add additional policy flexibility to ensure the Neighbourhood Plan can deliver least 150 new dwellings over the period to 2033.

2.40 Option 2 and 3 was also rejected through public consultation feedback.

Policy H8: Land South of Rothermead

Summary of the Options

2.41 The Focused Change Policy H8 option allocates the site for residential use in accordance with Policy H1, but sets out site-specific landscape and access policy detail. The alternative ‘No Policy’ option does not provide and site specific policy detail.

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

Recommended Option:

2.42 The recommended option is to include a policy allocating the site for residential use in accordance with Policy H1 and provide site-specific landscape and access policy detail.

Assessment Comment:

2.43 The outcomes for both policy alternatives are broadly similar. However, the policy achieves a more positive outcome against objective 1 which seeks to conserve and enhance landscape character and objective 4 which seeks to conserve and enhance biodiversity within Petworth. The appraisal of the recommended option indicates that site-specific landscape strategy policy delivery will help to ensure that negative landscape impacts are mitigated, avoided or reduced. Clearly defining the extent of the site will assist in providing the community with certainty of the developable area.

Why were the other Option(s) rejected?

2.44 The ‘No Policy’ option was rejected, as the recommended option will ensure locally important site-specific landscape and access requirements are achieved.

3.0 Assessment Conclusion

- 3.1 The conclusion of the assessment of the Focused Changes is that they will have no significant negative environmental effects and will promote sustainable development
- 3.2 In coming to the Focused Change recommendations that Examiner required the use of planning judgement to strike the right balance between the technical suitability with respect of meeting the Basic Conditions prescribed by legislation and community acceptability of the Neighbourhood Plan.
- 3.3 Whilst the Focused Change recommendations alongside the Petworth Neighbourhood Plan policies taken as a whole, can in some instances lead to policies that may not be the most sustainable of all the potential choices made, they are nonetheless (individually and collectively) sufficiently sustainable so that they will lead to no significant negative environmental effects. This is the most important test required by the EU Directive on SEA and the 2004 Regulations.
- 3.4 The overall conclusion remains that the Petworth Neighbourhood Plan should deliver positive effects for local residents and businesses as Petworth meets its development needs in the period up to 2033. Reasonable alternative Focused Change policy options have been assessed to compare and contrast the options chosen, but in no case does the alternative perform better, and in most cases as well, against the chosen policy and there is therefore no case for policy changes as a result.
- 3.5 SEA guidance requires measures to prevent, reduce or offset significant adverse effects of implementing the plan. Where practical this Further Changes 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 Further Changes policies will positively contribute towards delivering the social, economic and environmental objectives set out in the SA framework.
- 3.6 Where any potential and negative effects were identified, it was concluded that the policies in the Petworth Neighbourhood Plan, the Saved Policies of the Chichester Local Plan 1999; the emerging policies of the South Downs National Park Local Plan; or the National Planning Policy Framework adequately alleviated or mitigated the impacts, particularly over the medium to longer term.

SA objectives

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

Focused Changes Option Sites Plan

