

Strategic Environmental Assessment for the Plaistow and Ifold Parish Neighbourhood Plan

Environmental Report to accompany the Submission
version of the Neighbourhood Plan

Plaistow & Ifold Parish Council

August 2018

Quality information

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Revision	Revision date	Details	Authorized	Name	Position
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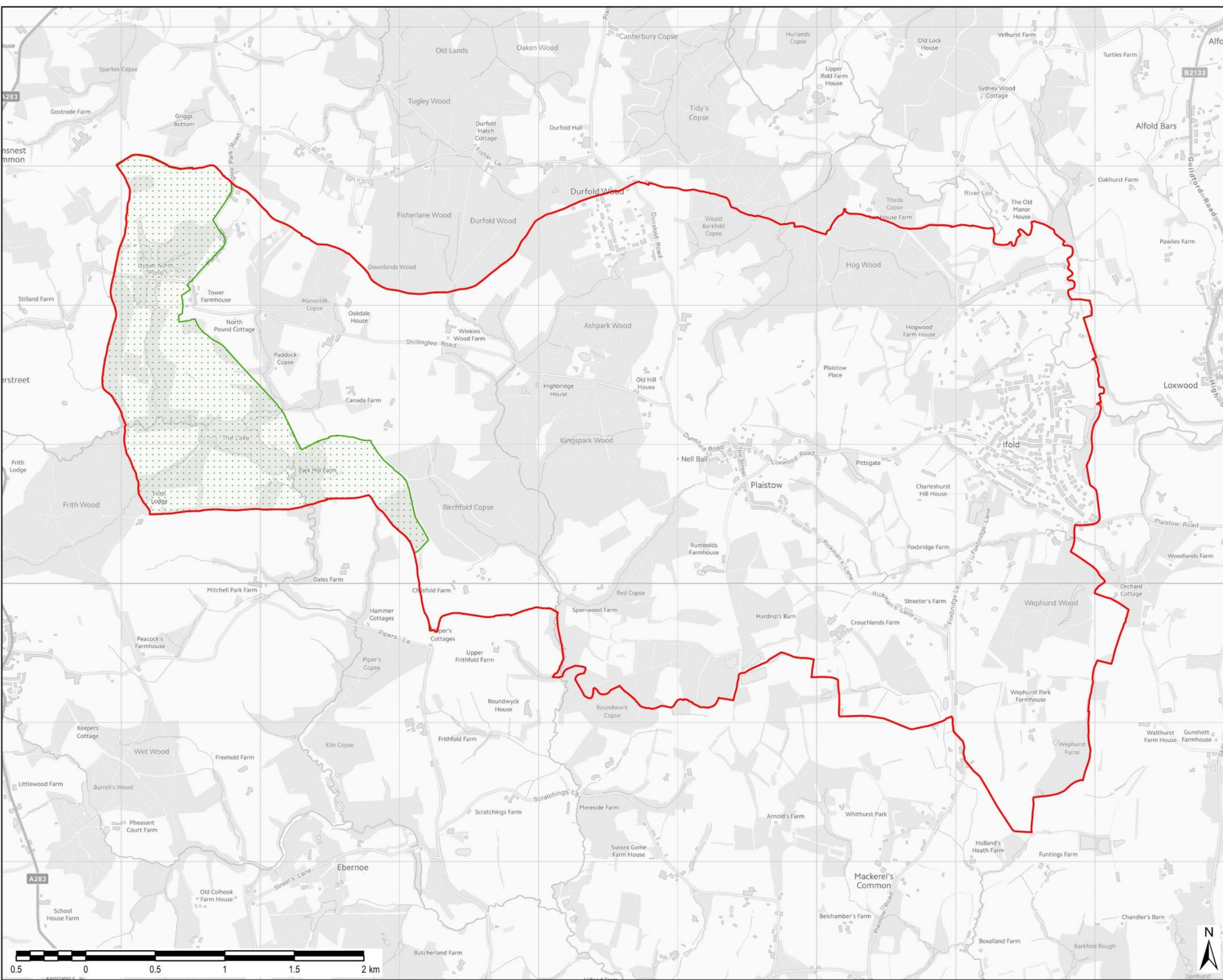
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File Name: I:\004 - Information Systems\6538603_Neighbourhood_Plan_LoB_Year02_Maps\Plaistow and Ifold Parish NE Steering Group\Figure 1.1 - Plaistow and Ifold Neighbourhood Plan Area.mxd



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LEGEND

- Plaistow and Ifold Parish Neighbourhood Plan Area
- Area of the Parish Covered by South Downs National Park

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Purpose of Issue **DRAFT**

Client
PLAISTOW AND IFOLD PARISH NEIGHBOURHOOD PLAN STEERING GROUP

Project Title
PLAISTOW AND IFOLD PARISH NEIGHBOURHOOD PLAN

Drawing Title
PLAISTOW AND IFOLD PARISH NEIGHBOURHOOD PLAN AREA

Drawn CN	Checked JW	Approved NCB	Date 15/05/2017
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Non-Technical Summary

What is strategic environmental assessment?

A strategic environmental assessment has been undertaken to inform the Plaistow and Ifold Parish Neighbourhood Plan. This process is required by the SEA Regulations.

SEA is used to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Plaistow and Ifold Neighbourhood Plan?

The Plaistow and Ifold Parish Neighbourhood Plan (PIPNP) presents a plan for the administrative area of Plaistow and Ifold Parish for the period to 2029. Prepared to be in conformity with the Chichester Local Plan: Key Policies 2014-2029, and the emerging South Downs National Park Authority (SDNPA) Local Plan, it sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, housing provision, the quality of life of residents, employment and the protection and enhancement of the environment.

The PIPNP was submitted to Chichester District Council in August 2018. As the Neighbourhood Plan area includes sections of two local authorities, it is the role of Chichester District Council to consult with the SDNPA at the draft submission stage of the Neighbourhood Plan.

Purpose of this Environmental Report

This Environmental Report, which accompanies the current consultation on the PIPNP, is the third document to be produced as part of the SEA process. The first document was the SEA Scoping Report (June 2017), which includes information about the Neighbourhood Plan area's environment and community. The second document was the Environmental Report accompanying Regulation 14 consultation on the draft plan (August 2017).

The purpose of this Environmental Report is to:

1. Identify, describe and evaluate the likely significant effects of the PIPNP and alternatives; and
2. Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the PIPNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the PIPNP has been assessed;
- The appraisal of alternative approaches for the PIPNP;
- The likely significant environmental effects of the PIPNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the PIPNP; and
- The next steps for the PIPNP and accompanying SEA process.

Assessment of alternative approaches for the PIPNP

The Neighbourhood Plan has been prepared in conjunction with the provisions of the Chichester Local Plan: Key Policies 2014-2029. Policy 5 of this document highlights that Plaistow & Ifold Parish should deliver in the region of ten dwellings in the plan period to 2029.

Taking this further, the emerging Site Allocation Development Plan Document (DPD), which is currently subject of examination in public, identifies that Plaistow & Ifold Parish should deliver the ten dwellings on the site 'Land North of Little Springfield Farm' (Policy PL1).

However the Parish Council, through the Neighbourhood Plan process, has been keen to consider alternative sites in the parish for meeting the Local Plan requirement.

Assessment of alternative options relating to the broad location of housing

A key aim of the Neighbourhood Plan is to ensure that housing delivered in the parish is appropriate for local needs. As such it was agreed that housing delivery in the parish should be undertaken through an allocation of one site of eleven dwellings. This is given the provisions of national policy which states that contributions to affordable housing should not be sought for developments of ten or fewer dwellings. Alongside, Policy 34 of the Local Plan states that a 30% affordable housing contribution on site will be sought as part of residential development where there is a net increase of dwellings of eleven or above.

In light of this, Plaistow & Ifold Parish Council considered where broadly in the parish such a development should go.

In light of these elements, the SEA process has considered four options, with a view to exploring the sustainability implications of delivering a site of c.11 dwellings in four alternative locations in the parish. Corresponding with the four settlements of the Neighbourhood Plan area, the options are as follows:

- **Option 1:** Deliver c.11 dwellings on one site within Ifold
- **Option 2:** Deliver c.11 dwellings on one site within Plaistow
- **Option 3:** Deliver c.11 dwellings on one site within Durfold Wood
- **Option 4:** Deliver c.11 dwellings on one site within Shillinglee

These four broad options were then appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). These were considered through the SEA Framework of objectives and assessment questions developed during scoping and the four options have been ranked in terms of their sustainability performance against the relevant SEA Theme.

The findings of the appraisal are presented in **Table 4.1** in the main body of the Environmental Report.

Following the consideration of where broadly new development should go in the Neighbourhood Plan area, and the outcomes of consultation events undertaken for the PIPNP, it was decided that Plaistow would be the appropriate location for an allocation in the Neighbourhood Plan. This is given there being significantly more services and facilities in the village than the other settlements considered, including the following:

- school;
- pre-school;
- shop;
- public house;
- village green;

- childrens' playground;
- village hall; and
- church.

Assessment of alternative options for a housing site allocation in Plaistow

Following the choice of Plaistow as the appropriate location for new housing, the SEA process has considered the three sites which were proposed in Plaistow as potential locations for allocation through the Neighbourhood Plan. The three sites are as follows:

- Land Opposite the Green, Plaistow (0.8ha)
- Land Adjacent to Todhurst, Plaistow (0.8ha)
- Land Adjacent to the Dairy and Edmund's Hill, Plaistow (0.8ha)

To support the consideration of the suitability of these sites, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the three sites and potential effects that may arise. **Tables 4.2 to 4.4** in the Environmental Report present the findings of the appraisals. The appraisal of these sites accompanied a broader site assessment which had been undertaken for the Neighbourhood Plan in summer 2016.

Choice of site to take forward for the purposes of the Neighbourhood Plan

Following the consideration of the findings of the site assessments undertaken for the Neighbourhood Plan, consultation events and an ongoing consideration of viability and achievability, it was determined that the preferred approach for the Neighbourhood Plan is to allocate the Land opposite the Green site in Plaistow for eleven dwellings.

In relation to the Land adjacent to Todhurst site, this was not taken forward as the landowner stated it was unviable. Alongside, it was recognised that parking and traffic issues in the adjacent Nell Ball housing area would be exacerbated by additional housing. The water resources utility, Southern Water, also informed that they require unrestricted access to the pumping station for a 9m vehicle, which would incur further restrictions.

With regard to the Land adjacent to the Dairy site, it was established that the impact of providing an access to this site would result in potential harm to significant trees present on site and the hedge adjacent to the road verge. Alternative access points were also considered, but due to land ownership issues which were not able to be resolved, and issues relating to its deliverability and achievability, it was decided to discontinue the consideration of the site for the purposes of the Neighbourhood Plan.

The latest version of the Chichester Site Allocation Development Plan Document allocates an alternative site for ten dwellings at the Land to the North of Little Springfield Farm in Ifold. To provide context on the potential decision to allocate the Land opposite the Green site for housing through the PIPNP instead of the Land to the North of Little Springfield Farm site, the SEA process has undertaken a comparative assessment of the two approaches.

The SEA process has therefore considered the following two options:

- **Option 1:** Deliver ten homes on the Land to the North of Little Springfield Farm site in Ifold
- **Option 2:** Deliver eleven homes on the Land opposite the Green site in Plaistow

Table 4.5 in the Environmental Report presents appraisal findings in relation to these two options.

Assessment of the current version of the PIPNP

The current Submission version of the PIPNP presents 17 planning policies for guiding development in the Neighbourhood Plan area.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the PIPNP. The Environmental Report has presented the findings of the assessment under the following sustainability themes:

- Biodiversity and geodiversity
- Climatic factors (including flood risk)
- Landscape and historic environment
- Land, soil and water resources
- Population and community
- Health and wellbeing
- Transportation

The appraisal has concluded that the current version of the PIPNP is likely to lead to significant positive effects in relation to the 'population and community' and 'health and wellbeing' sustainability objectives. These benefits largely relate to the carefully targeted spatial approach proposed by the draft plan, the focus on improving the quality of life of residents in the Neighbourhood Plan area and the Neighbourhood Plan's impetus on protecting and enhancing open space and the quality of the public realm.

In addition, the Neighbourhood Plan has a strong focus on protecting and enhancing landscape and villagescape character and the setting of the historic environment, leading to significant positive effects in relation to the 'landscape and historic environment' theme.

The current version of the PIPNP will initiate a number of beneficial approaches regarding the 'biodiversity', 'transportation', 'land, soil and water resources' and 'climatic factors' sustainability themes. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

Next steps

This Environmental Report accompanies the PIPNP for submission to the Local Planning Authority, Chichester District Council, for Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Chichester Local Plan.

If Independent Examination is favourable, the PIPNP will be subject to a referendum, organised by Chichester District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the PIPNP will become part of the Development Plan for Plaistow & Ifold Parish.

1. Introduction

1.1 Background

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Plaistow and Ifold Parish Neighbourhood Plan (PIPNP).

The PIPNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011. The Neighbourhood Plan area, which includes the parish area of Plaistow and Ifold (Figure 1.1), is being prepared in the context of the Chichester Local Plan: Key Policies 2014-2019, and the emerging South Downs National Park Authority (SDNPA) Local Plan.

The PIPNP was submitted to Chichester District Council in August 2018. As the Neighbourhood Plan area is within the boundaries of two local authorities, it is the role of Chichester District Council to consult with the SDNPA at the draft submission stage of the neighbourhood plan as part of the consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

Key information relating to the PIPNP is presented in Table 1.1.

Table 1.1: Key facts relating to the Plaistow and Ifold Neighbourhood Plan

Name of Qualifying Body	Plaistow and Ifold Parish Council
Title of Plan	Plaistow and Ifold Parish Neighbourhood Plan (PIPNP)
Subject	Neighbourhood planning
Purpose	<p>The PIPNP is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Chichester Local Plan: Key Policies 2014-2029, and the emerging South Downs National Park Authority (SDNPA) Local Plan.</p> <p>The PIPNP will be used to guide and shape development within the Plaistow and Ifold Parish Neighbourhood Plan area.</p>
Timescale	To 2029
Area covered by the plan	The Neighbourhood Plan area covers the parish of Plaistow and Ifold in Chichester District in West Sussex. The Neighbourhood Plan area is within the boundaries of two local authorities, with the western part of the Neighbourhood Plan area covered by the South Downs National Park Authority, and the majority covered by the area administered by Chichester District Council, see (Figure 1.1)
Summary of content	The PIPNP will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	<p>Beverley Weddell, Parish Clerk</p> <p>Plaistow & Ifold Parish Council</p> <p>Email address: clerk@plaistowandifold.org.uk</p>

1.2 SEA explained

The PIPNP has been screened in as requiring an SEA.

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the PIPNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.

The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive¹.

The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

In line with the SEA Regulations this Environmental Report must essentially answer four questions:

- What is the scope of the SEA?
- What has plan-making/SEA involved up to this point?
 - 'Reasonable alternatives' must have been appraised for the plan.
- What are the appraisal findings at this stage?
 - i.e. in relation to the draft plan.
- What happens next?

These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SEA questions.

¹ Directive 2001/42/EC

1.3 Structure of this Environmental Report

This document is the Environmental Report for the PIPNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.

Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory² requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ³
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What is the sustainability 'context'?	<ul style="list-style-type: none"> The relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
	<ul style="list-style-type: none"> The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What are the key issues & objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Submission version of the plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Submission version of the plan
What happens next?	<ul style="list-style-type: none"> The next steps for plan making/SEA process.

² Environmental Assessment of Plans and Programmes Regulations 2004

³ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the PIPNP

2.1 Local Plan context for the PIPNP

The Plaistow and Ifold Parish Neighbourhood Plan is being prepared in the context of the adopted Chichester Local Plan and the emerging South Downs Local Plan.

Chichester Local Plan: Key Policies 2014-2029

The Chichester Local Plan: Key Policies 2014-2029 was adopted in 2015 and provides a broad policy framework and a long term strategy to manage development, protect the environment, deliver infrastructure and promote sustainable communities within Chichester District, excluding the area of the district which lies within the South Downs National park.

Plaistow/Ifold together is designated as a Service Village in the Local Plan by Policy 2 of the document. Service villages are defined as:

"Villages that either provide a reasonable range of basic facilities (e.g. primary school, convenience store and post office) to meet the everyday needs of local residents, or villages that provide fewer of these facilities but that have reasonable access to them in nearby settlements."

Outside of Chichester city and the 'Settlement Hubs' of East Wittering/Bracklesham, Selsey, Southbourne and Tangmere, the Service Villages will be the focus for new development and facilities in the district. In this context the Local Plan sets out that the following will be appropriate in the Service Villages:

- Small scale housing developments;
- Local community facilities, including village shops, that meet identified needs within the village, neighbouring villages and surrounding smaller communities, and will help make the settlement more self-sufficient; and
- Small scale employment, tourism or leisure proposals.

In terms of housing numbers, Policy 5 of the Local Plan suggests that ten dwellings should be delivered in Plaistow & Ifold Parish in the period 2014 to 2029. It also highlights that suitable sites should be identified through the Neighbourhood Plan.

Emerging Site Allocation Development Plan Document Chichester Local Plan (2014-2029)

The CDC are at an advanced stage of preparing a further development plan document - The Site Allocation Preferred Approach Development Plan Document (DPD). Consultation on the proposed main and minor modifications was undertaken in March 2018. The DPD is intended to deliver the housing numbers and employment as set out in the adopted Local Plan. The DPD identifies that Plaistow & Ifold Parish should deliver about 10 units to meet the identified housing requirement on the following site: Land to the North of Little Springfield Farm.

However, following discussions between the Parish Council and CDC, the Neighbourhood Plan is seeking to allocate an alternative site. This has been discussed in more detail in **Section 4.3** of this Environmental Report.

South Downs Local Plan

The South Downs National Park Authority (SDNPA) was established on 1 April 2011 and is the statutory Local Planning Authority (LPA) for the National Park area. National Park Authorities are independent authorities operating within the local government framework. They have two statutory purposes:

Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and

Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.

If there is a conflict between the two, conservation takes precedence.⁴

In addition, SDNPA has a **duty** under Section 62 of the Environment Act 1995 to work in partnership with other organisations to foster the socio-economic well-being of local communities within the National Park, in support of the above purposes. Section 62 also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these Purposes. Where there is an irreconcilable conflict between the statutory Purposes, the Sandford⁵ Principle is statutorily required to be applied and the first Purpose of the National Park will be given priority.

The South Downs Local Plan is currently being prepared by the South Downs National Park Authority and is due to undertake examination in autumn 2018. The latest version of the South Downs Local Plan does not include allocations or housing numbers for the part of the Neighbourhood Plan area within the National Park.

2.2 Vision for the PIPNP

The vision for the Plaistow and Ifold Neighbourhood Plan, which was developed during earlier stages of plan development, is as follows:

“

We care about where we live. We want to protect our sense of community, the safety and rural tranquillity that we value. It's why we live here and why we choose to raise our families here, amongst generations of friends and familiar faces.

Our four unique settlements will grow naturally; sympathetically blending new with old; respecting the character, natural boundaries and vistas in this special part of West Sussex; protecting our environment and quality of life for those living and working here today and for the generations to come; and with recognition of the importance of this Parish in contributing to the setting of the South Downs National Park.

Vision for the Plaistow and Ifold Neighbourhood
Plan

”

To support the Neighbourhood Plan's vision, the PIPNP sets out a number of Neighbourhood Plan policies. The latest iteration of these policies has been appraised in **Chapter 5** of this Environmental Report.

⁴ Defra (2010) English National Parks and the Broads UK Government Vision and Circular 2010

⁵ The Sandford Principle – a statement first made by Lord Sandford in his committees report on possible changes to the management and legislation governing National Parks and now in the Environment Act 1995 which states that: 'if it appears that there is a conflict between those two Purposes, any relevant Authority shall attach greater weight to the first [Purpose]'.

3. The Scope of the SEA

3.1 SEA Scoping Report

The SEA Regulations require that: "*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*". In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁶ These authorities were consulted on the scope of the PIPNP SEA in June 2017.

The purpose of scoping was to outline the 'scope' of the SEA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability issues for the Neighbourhood Plan; and
- An 'SEA Framework' of objectives against which the Neighbourhood Plan can be assessed.

Baseline information (including the context review and baseline data) is presented in **Appendix A**.

Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1**. In addition to the statutory consultation bodies, comments from Chichester District Council and the South Downs National Park Authority have also been included within **Table 3.1**.

⁶ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because '*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme*.'

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
<p>Natural England</p>	
<p>Alison Giacomelli, Lead Adviser – Sustainable Development</p>	
<p>No further recommendations made. The scoping report has covered all the areas that are within Natural England’s statutory remit (designated nature conservation sites, protected landscapes, species and soils), and picked up all the issues that we would like to see covered.</p>	<p>Comment noted</p>
<p>Historic England</p>	
<p>Martin Small, Principal Adviser – Historic Environment Planning</p>	
<p><u>General Comments</u></p>	
<p>The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of interest. In addition, general guidance on Sustainability Appraisal and the historic environment is set out in Historic England’s publication “Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment”</p>	<p>The Historic England website along with the recommended guidance document have been considered</p>
<p><u>Structure of the Landscape and Historic Environment Chapter</u></p>	
<p>We suggest treating landscape and the historic environment as separate matters. Both are substantial matters in their own right, worthy of separate consideration as they are subject to different issues. Taking the two together could lead to the masking of effects on one or the other.</p>	<p>Although located within the same chapter of the SEA Scoping Report, the landscape and historic environment considerations have been discussed in separate sections within this chapter.</p>
<p><u>Policy Considerations</u></p>	
<p>Given that part of the Plan area lies within the South Downs National Park, particularly if this section is to continue to refer to landscape as well as the historic environment, then paragraph 115 of the National Planning Policy Framework should also be cited:</p> <p><i>“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.”</i></p> <p>Although not “policy” as such, it might also be worth citing the National Planning Practice Guidance’s advice that Neighbourhood Plans should include enough information, where relevant, <i>“about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale”</i> and <i>“about local non-designated heritage assets including sites of archaeological interest to guide decisions”</i>.</p>	<p>Paragraph 115 of the NPPF has been cited the ‘context review’ section of the Landscape and Historical Environment chapter, along with the National Planning Practice Guidance’s advice on Neighbourhood Plans, as recommended by Historic England.</p>

Consultation response

How the response was considered and addressed

We would expect the Scoping Report to set out the indicators or measures by which the policies and proposals of the Plan can be assessed against the objectives and sub-objectives. Appendix 4 of the Historic England advice on Strategic Environmental Assessments and the Historic Environment contains a range of possible indicators for assessing and monitoring the performance of the policies and proposals of the Plan against a historic environment objective. Not all of these will be relevant, but we suggest that the following be considered:

- the number and percentage of different heritage assets at risk;
- the percentage of planning applications where archaeological investigations were required prior to approval; and
- the percentage of planning applications where archaeological mitigation strategies were developed and implemented.

Indicators for each objective and assessment question were not included as it is not possible to specifically measure at this assessment stage the extent to which the baseline is likely to change.

Additional Inclusions and/or Amendments to the Baseline Information

Comment noted.

Has there been a characterisation of the Plan area as a whole? Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. We therefore suggest a characterisation study as a precursor to neighbourhood plans as such a study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

We welcome the reference to buildings of historic and local importance and the examples given, but is there an actual list of locally important buildings? If not, then this should also be identified as a gap in the baseline. We also welcome the reference to the Chichester Historic Environment Record but would also welcome a reference to the West Sussex Historic Landscape Character Assessment.

A list of locally important buildings has been included within the summary of the current baseline for the Landscape and Historic Environment chapter. Details about the West Sussex Historic Landscape Character Assessment have also been included. The addition has been included as an assessment question within the following SEA objective: 'Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets'.
Comment noted and addressed.

We welcome the proposed sustainability objective in sub-section 5.4 of the Report and the proposed Assessment Questions, although we would welcome an additional sub-objective "*Conserve and enhance archaeological remains, both scheduled and non-scheduled, including historic landscapes*".

Consultation response

How the response was considered and addressed

Additional Inclusions and/or Amendments to the Baseline Information

Has there been any or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation or insensitive street works? According to the National Heritage List for England (<http://list.historicengland.org.uk/results.aspx?index=26>) Shillinglee Court is Grade II* listed and within the parish. We consider that it would be helpful to explain in more detail what the special interest of the Conservation Area (the reason for its designation) is in paragraph 5.3.1. We do not consider the number or location of listed buildings or the designation of the Conservation Area to be sustainability "issues" as such, but part of the baseline. The potential effects of new development on those heritage assets are, however, as recognised in the Scoping Report, a potential issue.

Information from the Village Design Statement regarding the Grade II* listed Shillinglee Court has been included in the summary of baseline conditions, along with additional detail about the special interest of the Plaistow Conservation Area. Furthermore, a summary of any losses of character have also been included.

Additional Inclusions and/or Amendments to the Baseline Information

The condition of heritage assets may also be an issue. As noted in the Scoping Report, the Historic England Heritage at Risk Register does not include Grade II listed buildings outside London. However, we believe that the South Downs National Park Authority has undertaken a survey of the grade II listed buildings in the Park – are any of the grade II listed buildings in that part of the Plan area within the National Park identified as being at risk? As no survey has apparently been undertaken of the condition of the Grade II listed buildings in that part of the Plan area outside the Park, this is rightly identified as a gap in the baseline.

This has been included within the 'summary of baseline conditions' section of the Landscape and Historic Environment chapter. Details from the 2012/13 Buildings at Risk Survey for the South Downs National Park have also been included.

Environment Agency

Marguerite Oxley, Sustainable Places Principal Officer

General Comments:

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/lit_6524_7da381.pdf

Advice has been considered.

Flood Risk

Your Neighbourhood Plan should conform to national and local policies on flood risk:

- National Planning Policy Framework – para.100

'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.'

- Chichester Local Plan: Key Policies 2014-2019: Key Policies Pre-Submission - Draft Policy 42

'... Flood and erosion risk will be taken into account at all stages in the planning process to avoid inappropriate development in areas at current or future risk, and to direct development away from areas of highest risk... "

Paragraph 100 of the NPPF has been included within the 'context review' section of the Climate Change chapter. Reference is also made to the Chichester Local Plan: Key Policies 2014-2019 Draft Policy 42

Consultation response

How the response was considered and addressed

We are pleased to see that all development proposed through your Neighbourhood Plan has been directed to areas of lowest risk of flooding. This is consistent with the aims of national planning policy and the emerging policies in the Chichester District Local Plan. If you are aware that any of the sites have previously suffered flooding or are at risk of other sources of flood risk such as surface water or groundwater flooding we recommend you seek the advice of West Sussex County Council and Chichester District Council.

Comments noted.

In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk. This should be informed by the Environment Agency's flood risk of flooding: map for planning and Chichester District Council's Strategic Flood Risk Assessment (SFRA). We recommend you contact Chichester District Council to discuss this requirement further.

Policies within the draft Neighbourhood Plan have been assessed against their ability to address flood risk issues, and are further discussed in Section 5.5 of this Environmental Report.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken. It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward. Please contact us for further advice if any sites include areas of Flood Zone 3, which is defined as having a high probability of flooding, as we may have concerns with your Plan.

Wastewater Treatment

Comments noted

Chichester City, Fishbourne, Donnington and Apuldram Neighbourhood Plan areas fall within the drainage catchment of the Apuldram Wastewater Treatment Works. There are concerns regarding the impact of the storm overflow from the treatment works on the water quality in Chichester Harbour. We would recommend that you check with Chichester District Council that any allocation is included within their headroom assessment. You may also wish to consider how you may manage development locally once the agreed headroom has been used up.

Water Management

The comment has been addressed within the 'context review' section of the 'Land, Soils and Water Resources' chapter.

In February 2011, the Government signalled its belief that more locally focussed decision making and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive. Chichester District Council lies within the South East River Basin Management Plan area. This area is subdivided into catchments. The relevant catchment for your District is the Arun and Western Streams catchment. A Catchment Partnership has been established for each of these to direct and coordinate relevant activities and projects within the catchment through the production of a Catchment Management Plan. The Catchment Partnerships are supported by a broad range of organisations and individuals representing a whole host of interests.

The following websites provides information that should be of use in developing your Neighbourhood Plan:

<https://www.gov.uk/government/publications/south-east-river-basin-management-plan>

<http://www.arunwesternstreams.org.uk>

Consultation response	How the response was considered and addressed
<p><u>Infrastructure Delivery</u></p> <p>We would recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account when looking to fund local infrastructure.</p>	<p>Comment noted</p>
<p>Chichester District Council Valerie Dobson, Principal Planning Officer</p>	
<p><u>General Comments:</u></p> <p>The issues and the baseline data are well identified and the SEA objectives are clear and concise. There are, however, a large number of assessment questions and we question whether all of these will be useful in distinguishing between viable options for the Neighbourhood Plan. There are 58 assessment questions in the scoping report and this is considered to be high. The SEA should be proportionate; it is not clear whether all of the questions are to be used for all of the options. This is above the number used in the Local Plan review Sustainability Appraisal which includes economic issues not included in an SEA.</p>	<p>Whilst there a large number of assessment questions presented, these provide an overall guide for the assessment proposed. Each option and proposal has not been considered one-by-one against each of the questions; instead the questions have been considered as a whole to provide an indication of likely significant effects.</p>
<p><u>Local Authority and Local Plan</u></p> <p>The accurate name of the Chichester Local Plan is the Chichester Local Plan: Key Policies 2014-2019: Key Policies 2014-2029 (CLPKP). We suggest that all references are amended accordingly.</p> <p>CDC is the lead planning authority for the neighbourhood plan. We suggest the text is amended to reflect this as the draft submission neighbourhood plan is not submitted to the South Downs National Park Authority (SDNPA). Rather it is the role of Chichester District Council to consult with the SDNPA at the draft submission stage of the neighbourhood plan as part of the consultation under regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). It may be helpful to have an entry to show that the designated area is covered by two different planning authorities. Where the 'Area covered by the plan' is included, the text could be adjusted to make this clear.</p> <p>The SEA determination has been made by CDC as the appropriate authority, rather than CDC and SDNPA. This section may benefit from highlighting where the SEA determination letter set out the areas of environmental concern.</p> <p>Paragraph 10.1 - first and second paragraphs after bullet 5. – This should also make reference to the Parish Council as it is the Parish Council rather than the Neighbourhood Plan Group who will formally agree the version of the Plan for consultation as part of regulation 14 and, following any changes as a result of the consultation, also formally agree the draft submission Plan for CDC.</p>	<p>The name of the local plan has been updated, accordingly.</p> <p>Text has been amended within the non-technical summary and Section 1 of this Environmental Report, in respect of this fact.</p> <p>Table 1.1 in this Environmental Report states that the Neighbourhood Plan area is covered by two different planning authorities.</p> <p>Comment addressed in Section 6, Paragraph1 of this Environmental Report.</p>

Consultation response

How the response was considered and addressed

Comments on Wording

Paragraph 5.4 - under the first heading of 'SEA Objective' should the text read 'Protect, conserve and enhance...' rather than 'Protect, maintain and enhance...?'

Paragraph 6.3.2 - second paragraph there is a bracket missing after the word 'replacement'.

Paragraph 8.4 - under the first heading of 'SEA Objective' should the text read 'Improve the health and wellbeing of residents...?'

The SEA Objective has been amended, in Table 3.2 of this environmental report

Comment noted and addressed within Appendix A (section A.5) of this environmental report

Comment noted and addressed in Table 3.2 of this environmental report.

South Downs National Park Authority

Amy Tyler-Jones – Planning Policy Officer

Air Quality

The section on air quality does not reference air quality impacts on biodiversity. In light of the High Court ruling on the Lewes Joint Core Strategy and subsequent implications for measuring the impact of traffic movements on European designated nature sites, consideration should be given to the potential impact of traffic movements on nearby designated sites including Ebernoe Common and the Mens which are sensitive to air pollution.

Response to this comment was received from Plaistow & Ifold Parish Council, stating that the Parish is only allocating 10 dwellings within the area. Air quality has been scoped out of the SEA, due to the absence of any significant impacts.

Biodiversity

Reference is made to Ebernoe Common Special Area of Conservation (SAC). However, the Mens SAC is also less than 7km away and therefore the effects of development will need to be considered in relation to the conservation features and overall integrity of both of these sites under the Habitats Directive. Both of these sites have been protected for their importance for bats. This means has implications for the supporting habitats and commuting / foraging routes of bats which may extend into the neighbourhood area and will need to be protected.

Details about the Mens SAC have been added to the summary of baseline conditions section within the 'Biodiversity' chapter.

Both the Ebernoe Common SAC and the Mens SAC have also been considered within the 'key sustainability issues' for Biodiversity.

Landscape and Historic Environment

The South Downs National Park gained International Dark Sky Reserve status in 2016. Development within the setting of the National Park must have due regard to the special qualities of the National Park. It would be good to see the protection of dark night skies within the landscape objective of the sustainability framework.

Response to this comment was received from the Plaistow & Ifold Parish Council, mentioning that the proposed development site is not within the boundary of the South Downs National Park. Plaistow & Ifold Parish Council has also stated the following "we will amend the Draft Plan Policy EH5 - Artificial Lighting Emissions accordingly and add under conformity references: the SDNPA Scoping Response and that the SDNP gained International Dark Sky Reserve status in 2016.

3.2 Key Sustainability Issues

Drawing on the review of the sustainability context and baseline, the SEA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SEA. These issues are as follows, presented by eight environmental themes. In the absence of any significant or tangible issues, one of these environmental themes have been scoped out for the purposes of the SEA process.

3.2.1 Air Quality

- Air quality in the PIPNP is good, with no significant issues identified.
- There are no Air Quality Management Areas within the Neighbourhood Plan area.
- The biogas plant located at Crouchland Farm, Rickmans Lane, and Plaistow is likely to have some contribution to air pollutants in the Neighbourhood Plan area.
- Housing and employment growth may impact on traffic and congestion in the PIPNP area, which has the potential to increase emissions and reduce air quality. However, given the low existing baseline for air pollutants, this potential impact is unlikely to be significant.

As no significant air quality issues have been identified in the Neighbourhood Plan area, **air quality has been scoped out for the purposes of the SEA process.**

3.2.2 Biodiversity

- The Ebernoe Common SAC and The Mens SAC are European Protected Sites located to the south of the Neighbourhood Plan area.
- Two SSSIs are located within or partially within the PIPNP area.
- The majority of the Neighbourhood Plan area lies within an IRZ for one or more SSSI, with areas around Plaistow and Ifold villages lying within an IRZ for 'Residential development of 100 units or more'. This denotes that development sites of over 100 houses or more in size may have the potential to have impacts on SSSIs present locally.
- Biodiversity Action Plan Habitats are present throughout the Neighbourhood Plan area, supporting a range of species.

3.2.3 Climate Change

- An increase in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions.
- Chichester District Council has a higher per capita emissions total than both the South East and England as a whole since 2005.
- Several residential properties and areas of the local road network are within Flood Risk 3.
- The potential effects of climate change on the PIPNP are varied. As such there is a need to improve the resilience of the Neighbourhood Plan area by supporting and encouraging adaptation strategies.

3.2.4 Landscape and Historic Environment

- The western part of the Neighbourhood Plan area lies within the South Downs National Park.
- There are 72 Grade II listed buildings within the Neighbourhood Plan area.
- The Plaistow Conservation Area lies within the Neighbourhood Plan area. It was extended in May 2013, after the Neighbourhood Plan area was designated.

- Whilst there is a greater concentration of listed buildings in Plaistow than Ifold, Ifold also has significant historic environment interest. For example there are buildings of historic and local importance in Ifold that are not listed; some of these date from the 1800s, including Butlers formerly Alpine Cottage, Hogwood House, Ifold Cottage, Keepers Cottage, Trelayne and The Lodge.
- New development has the potential to lead to beneficial and adverse effects on the historic environment, including through affecting the setting of cultural heritage assets and landscape/townscape quality.
- New development could lead to pressures on non-designated sites and villagescapes, including from the loss of key built and natural features.
- Improvement in access to and enhancement of, historic environment assets and enhancements to local distinctiveness through high quality development has potential for positive benefits for tourism.

3.2.5 Land, Soil and Water Resources

- The main watercourse in the Neighbourhood Plan area is the Wey and Arun Canal.
- The whole of the Neighbourhood Plan area is located within a Nitrate Vulnerable Zone for surface water.
- It is uncertain whether agricultural land in the Neighbourhood Plan area comprises land classified as the 'best and most versatile'.
- A major pollution event was recorded in the Neighbourhood Plan area in 2016 (emanating from the unlawful expansion of an AD Unit into an industrial biogas plant at Crouchland Farm).
- Water quality has the potential to be affected by pollution incidents in the area, the presence of non-native species and future physical modifications to waterbodies.

3.2.6 Population and Community

- Recent population increases within the Neighbourhood Plan area are lower than the average rate at which the district, regional and national population have grown.
- The proportion of residents within the 16-24 age range in the parish is significantly lower than district, regional and national comparators. Similarly the population within the 24-44 age range is significantly lower than the district, regional and national average.
- A higher proportion of residents within the Neighbourhood Plan area are employed in high skilled occupations, such as managers, directors and senior officials.

3.2.7 Health and Wellbeing

- The majority of residents within the Neighbourhood Plan area consider themselves to have 'very good health' or 'good health'.
- Residents within the Neighbourhood Plan area have relatively low levels of disability when compared with the regional, local and national averages.
- A growing population has the potential to increase pressures on healthcare services, and is therefore a significant influence on future health and wellbeing in the Neighbourhood Plan area.

3.2.8 Transportation

- There is no railway station within the Neighbourhood Plan area; the nearest stations are at Haslemere and Billingshurst.

- There are two Compass Travel bus services running in the area, with connections to nearby towns, however they are very infrequent, and do not run every day.
- There is a need for continued enhancement to public transport networks in the Neighbourhood Plan area.
- After driving, the most second most popular method of travelling to work in Plaistow and Ifold is to work from home. There is the potential for the number of people working from home to significantly increase due to modern working patterns such as agile and flexible working.

3.3 SEA Framework

The issues were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework for the PIPNP is presented below, excluding the environmental themes which have been scoped out.

Table 3.2: SEA Framework for the Plaistow and Ifold Neighbourhood Plan

SEA Objective	Assessment questions
Biodiversity and Geodiversity	
Protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the statuses of the European protected sites within the vicinity of the Neighbourhood Plan area boundary, including: The Ebernoe Common SAC and The Mens SAC? • Support the status of the nationally designated sites within and/or in the vicinity of the Neighbourhood Plan area boundary, including: The Shillinglee Lake SSSI and the Chiddingfold Forest SSSI? • Support the status of the locally designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary? • Protect and enhance semi-natural habitats? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climatic factors	
Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks?

SEA Objective	Assessment questions
Landscape and Historic Environment	
Protect, conserve and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest? • Conserve and enhance the Plaistow Conservation Areas? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment? • "Conserve and enhance archaeological remains, both scheduled and non-scheduled, including historic landscapes".
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of the South Downs National Park? • Support the integrity of the local landscape character? • Conserve and enhance landscape and townscape features?
Land, Soil and Water Resources	
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of previously developed land? • Direct development on greenfield sites to land not classified as the best and most versatile?
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the amount of waste produced? • Support the minimisation, reuse and recycling of waste? • Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? • Encourage recycling of materials and minimise consumption of resources during construction?
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support improvements to water quality? • Minimise water consumption?
Population and Community	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the development of a range of high quality, accessible community facilities? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Support the provision of land for allotments and cemeteries?
Reduce deprivation and promote a more inclusive and self-contained community.	

SEA Objective	Assessment questions
<p>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
<p>Health and Wellbeing</p>	
<p>Improve the health and wellbeing of residents within the Neighbourhood Plan area.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Align to the key priority areas outlined in the Joint Strategic Needs Assessment? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Reduce noise pollution? • Promote the use of healthier modes of travel? • Improve access to the countryside for recreational use, including the South Downs National Park.
<p>Transportation</p>	
<p>Promote sustainable transport use and reduce the need to travel.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure enhancements? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents from the road network? • Facilitate enhancements in pedestrian and cycle networks?

4. What has plan making / SEA involved to this point?

4.1 Introduction

In accordance with the SEA Regulations the Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the PIPNP has been informed by an assessment of alternative locations for non-strategic scale development in the Neighbourhood Plan area.

4.2 Overview of plan making / SEA work undertaken since 2014

Plan-making for the PIPNP has been underway since 2014. Initial work incorporated a number of informal and formal consultation exercises carried out by Plaistow & Ifold Parish Council, including on the scope of the Neighbourhood Plan.

A significant number of consultation events have since been carried out for the Neighbourhood Plan. This has included a range of exhibitions, public meetings and questions and answer sessions as well as workshops.

The following sections discuss the evolution of the PIPNP in association with the SEA process.

4.3 Assessment of reasonable alternatives for the Neighbourhood Plan

4.3.1 Introduction

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the PIPNP. The SEA Regulations⁷ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.

The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for proposed development. Specifically, this chapter explains how the PIPNP's development strategy has been shaped through considering alternative approaches for the location of new housing allocations in the Neighbourhood Plan area.

4.3.2 Local Plan context

As discussed in **Section 2.1**, the Neighbourhood Plan has been prepared in conjunction with the provisions of the Chichester Local Plan: Key Policies 2014-2029.

Plaistow / Ifold together is designated as a Service Village in the Local Plan by Policy 2 of the Local Plan. Service villages are defined as:

⁷ Environmental Assessment of Plans and Programmes Regulations 2004

"Villages that either provide a reasonable range of basic facilities (e.g. primary school, convenience store and post office) to meet the everyday needs of local residents, or villages that provide fewer of these facilities but that have reasonable access to them in nearby settlements."

The Local Plan sets out that the following will be appropriate in the Service Villages:

- Small scale housing developments;
- Local community facilities, including village shops, that meet identified needs within the village, neighbouring villages and surrounding smaller communities, and will help make the settlement more self-sufficient; and
- Small scale employment, tourism or leisure proposals.

Policy 5 of the Local Plan highlights that Plaistow & Ifold Parish should deliver in the region of ten dwellings in the plan period to 2029.

Taking this further, the emerging Site Allocation Development Plan Document (DPD), which will be the subject of examination in public in September 2017, identifies that Plaistow & Ifold Parish should deliver the 10 dwellings on the site 'Land North of Little Springfield Farm' (Policy PL1).

4.3.3 Reasonable alternatives for broad spatial strategies

The Parish Council, through the Neighbourhood Plan process, has been keen to consider alternative sites in the parish for meeting the Local Plan requirement.

A key aim of the Neighbourhood Plan is to ensure that housing delivered in the parish is of a type and tenure which is appropriate for local needs. As such it was agreed that housing delivery in the parish should be undertaken through an allocation of one site of 11 dwellings. This is given the provisions of the small sites affordable housing contributions policy, which was introduced by the UK Government in November 2014 to help boost housing delivery and incentivise brownfield development. This introduced a national threshold of ten units or fewer (and a maximum combined gross floor space of no more than 1,000 square metres) beneath which affordable housing contributions should not be sought. Alongside, Policy 34 of the Local Plan states that a 30% affordable housing contribution on site will be sought as part of residential development where there is a net increase of dwellings of 11 or above.

In light of this, Plaistow & Ifold Parish Council considered where broadly in the parish such a development should go.

In light of these elements, the SEA process has considered four options, with a view to exploring the sustainability implications of delivering a site of c.11 dwellings in four alternative locations. Corresponding with the four settlements of the Neighbourhood Plan area, the options are as follows:

- **Option 1:** Deliver c.11 dwellings on one site within Ifold
- **Option 2:** Deliver c.11 dwellings on one site within Plaistow
- **Option 3:** Deliver c.11 dwellings on one site within Durfold Wood
- **Option 4:** Deliver c.11 dwellings on one site within Shillinglee

The following table presents appraisal findings in relation to the four options introduced above. These are organised by the seven SEA themes.

The SEA team appraised these four broad options as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). These were considered through the SEA Framework of objectives and assessment questions developed during scoping and the four options have been ranked in terms of their sustainability performance against the relevant SEA Theme.

For each SEA Theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '4' the least favourable ranking.

The findings of the appraisal are presented in Table 4.1 below.

Table 4.1: Appraisal findings: reasonable alternatives

- Option 1:** Deliver c.11 dwellings on one site within Ifold
- Option 2:** Deliver c.11 dwellings on one site within Plaistow
- Option 3:** Deliver c.11 dwellings on one site within Durfold Wood
- Option 4:** Deliver c.11 dwellings on one site within Shillinglee

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
Biodiversity and geodiversity	<p>In terms of key biodiversity habitats, all of the four settlements have Biodiversity Action Plan (BAP) Priority Habitat and areas of ancient woodland located within or adjacent to the settlement.</p> <p>In this context: Adjacent to Durfold Wood are significant areas of deciduous woodland BAP Priority Habitat and areas of ancient woodland. Plaistow has some areas of deciduous woodland BAP Priority Habitat present to the south west of the village and east of the village, and smaller areas of ancient woodland. Ifold has a large number of areas scattered within and adjacent to the settlement, with a number of areas of ancient woodland. Shillinglee has significant areas of woodpasture and parkland BAP Priority Habitat, deciduous woodland BAP Priority Habitat and areas of ancient woodland located adjacent to the settlement. As such Shillinglee and Durfold Wood are most constrained by these designations, with Ifold also heavily constrained. Plaistow also is constrained in some parts of the village.</p> <p>In relation to potential impacts on SSSIs in the vicinities of the four settlements, both Plaistow and Shillinglee are within an Impact Risk Zone for the Chiddingfold Forest SSSI. However, given it is for residential development of 100 units or more, development at the scale proposed by the Neighbourhood Plan is not likely to have significant effects on the SSSI. Ifold is not within an SSSI Impact Risk Zone for residential development, with the exception of the area to the north west of the settlement, which is within an Impact Risk Zone for the SSSI for residential development of 100 units or more. Given its close proximity to the Chiddingfold Forest SSSI, part of Durfold Wood is within residential development of 10 units or more. As such development taken forward in the vicinity of the settlement through the Neighbourhood Plan would have significant potential to lead to impacts on the SSSI without avoidance and mitigation measures.</p>	1	2	4	3

- Option 1:** Deliver c.11 dwellings on one site within Ifold
- Option 2:** Deliver c.11 dwellings on one site within Plaistow
- Option 3:** Deliver c.11 dwellings on one site within Durfold Wood
- Option 4:** Deliver c.11 dwellings on one site within Shillinglee

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
Climate change	<p>In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions in the Neighbourhood Plan area. The extent to which the four options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element.</p> <p>Through directing new development to Durfold Wood and Shillinglee, which have few services and facilities, Option 3 and 4 would do the most of the options to lead to increased car dependency and a more limited use of sustainable modes of transport. In this context Options 3 and 4 have the most potential to lead to increases in greenhouse gas emissions from transport.</p> <p>In a similar context, focussing development in Ifold, which does not have a shop, church, school or pub, is likely to lead to an increase in the need to travel for services and facilities. As such, locating development in Plaistow, which has a shop, school, pre-school, village green, village hall, playing field and public house has the most potential of the options to limit emissions from transport.</p> <p>Whilst all options have the potential to lead to development in areas of elevated levels of flood risk, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. For example, the NPPF does not permit development within flood risk areas or where the effect would be to increase flood risk elsewhere without appropriate mitigation measures. Likewise, adherence to the recommendations and guidance presented in the Strategic Flood Risk Assessment (SFRA) undertaken for the wider district will help limit effects.</p>	2	1	3	3

- Option 1:** Deliver c.11 dwellings on one site within Ifold
- Option 2:** Deliver c.11 dwellings on one site within Plaistow
- Option 3:** Deliver c.11 dwellings on one site within Durfold Wood
- Option 4:** Deliver c.11 dwellings on one site within Shillinglee

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
Landscape and historic environment	<p>Plaistow has a rich historic environment, with numerous listed buildings present and a conservation area which covers much of the village. Shillinglee, given its association with the Arundel Estate and Shillinglee House also has a number of listed buildings present. Both Ifold and Durfold Wood are less sensitive in relation to the historic environment, with few heritage designations. In this context, Option 2 and 4, through directing development to the more sensitive areas of the Neighbourhood Plan area, have the most potential to lead to impacts on historic environment assets and their settings.</p> <p>In relation to the South Downs National Park, only development at Shillinglee is likely to impact on the setting of this nationally designated landscape. This is given the location of the hamlet adjacent to the National Park's boundaries.</p>	1	3	1	4
Land, soil and water resources	<p>In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken within the Neighbourhood Plan area. Based on the 1:250,000 series of ALC maps produced by Natural England and utilised for strategic purposes, the land in the Neighbourhood Plan area is non-agricultural or Grade 3 good to moderate. However there is no detailed information available as to whether the Grade 3 areas are 3a or 3b. As such it is not possible to differentiate between the options in this regard.</p> <p>In relation to water supply, the NPPF states that local plans should plan positively to ensure the provision of infrastructure for water supply, including an assessment of its quality and capacity. In the context of the current assessment, it is anticipated that the Water Resources Management Plans prepared by water supply companies will be expected to address long-term water supply issues associated with growth in the Neighbourhood Plan area.</p>	?	?	?	?

- Option 1:** Deliver c.11 dwellings on one site within Ifold
- Option 2:** Deliver c.11 dwellings on one site within Plaistow
- Option 3:** Deliver c.11 dwellings on one site within Durfold Wood
- Option 4:** Deliver c.11 dwellings on one site within Shillinglee

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
Population and community	<p>Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. Of the four settlements considered through the options, Plaistow has by far the broadest range of services and facilities in the Neighbourhood Plan area. These include a school, pre-school, shop, village green, childrens' playground, village hall, church, football field and public house. In contrast, services and facilities in Ifold are largely limited to a village hall, and Shillinglee and Durfold Wood have no significant amenities.</p> <p>In this context Option 2, through focusing housing in the settlement with the broadest range of amenities, will do more to promote the location of new housing in accessible locations. This will help limit the need for residents to travel for day-to-day services and facilities, supporting their quality of life.</p> <p>In terms of housing numbers, all of the options will meet the Local Plan requirement for the parish, and will, given the size of the proposed allocation of eleven dwellings, facilitate the provision of 30% affordable housing with the allocation.</p>	2	1	3	3
Health and Wellbeing	<p>Directing development to Plaistow rather than Ifold, Durfold Wood or Shillinglee will enhance accessibility through directing housing to the settlement with the broadest range of services and facilities. This will have benefits for the health and wellbeing of residents. Locating more housing in closer proximity to the facilities available will also support quality of life and wellbeing through promoting walking and cycling and active lifestyles.</p>	2	1	3	3
Transportation	<p>Option 2, through focusing housing in Plaistow, which is the settlement with the broadest range of services and facilities in the Neighbourhood Plan area, including a school, pre-school, shop, village green, childrens' playground, village hall, church, football field and public house, will help reduce the need to travel for certain amenities, and support sustainable modes of travel, including walking and cycling.</p> <p>Option 1, 2 and 4, through focusing housing in the settlements with a limited range of services and amenities, will do less to promote the location of new housing in accessible locations. This will increase the need for residents to travel for day-to-day services and facilities.</p>	2	1	3	3

4.3.4 Reasonable alternatives for sites in Plaistow

Following the consideration of where broadly new development should go in the Neighbourhood Plan area, and the outcomes of consultation events undertaken for the PIPNP, it was decided that Plaistow would be the appropriate location for an allocation in the Neighbourhood Plan. This is due to there being significantly more services and facilities in the village than the other settlements considered, including the following:

- school;
- pre-school;
- shop;
- public house;
- village green;
- childrens' playground;
- village hall; and
- church.

Three potential sites for allocation came forward in Plaistow through the call for sites with local landowners, developers and agents and with reference to CDC's SHLAA process.

The three sites were as follows:

- Land Opposite the Green, Plaistow (0.8ha)
- Land Adjacent to Todhurst, Plaistow (0.8ha)
- Land Adjacent to the Dairy and Edmund's Hill, Plaistow (0.8ha)

To support the consideration of the suitability of these sites, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the three sites and potential effects that may arise. In this context the sites have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping (**Section 3.3**) and the baseline information.

The tables below present a summary of this appraisal, and provide an indication of each site's sustainability performance in relation to the seven SEA themes.

It should be noted that the assessment of these sites through the SEA process accompanies a broader site assessment previously undertaken for the Neighbourhood Plan⁸. Undertaken in summer 2016, the site assessment considered a broader range of sites in Plaistow, Ifold and Durfold Wood. The Site Options and Assessment Report can be accessed at:

<https://plaistowandifoldparishnp.files.wordpress.com/2016/09/aecom-plaistow-and-ifold-site-assessment-final-report-150816.pdf>

⁸ AECOM (August 2016) Site Options and Assessment Report

Table 4.2: Site: Land Opposite the Green, Plaistow

SEA theme	Land Opposite the Green, Plaistow
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Site size: 0.8ha

Biodiversity and Geodiversity The site is within an Impact Risk Zone for the Chiddingfold Forest SSSI for residential development of 100 dwellings or more. Given the size of the proposed allocation (11 dwellings) the proposed allocation is therefore unlikely to have significant effects on the status of the SSSI.

No BAP Priority Habitats are present on or adjacent to the site.

The site comprises grassland and is maintained as mown, periodically used for grazing livestockgrazed. As such it does not comprise habitats for protected species. Site boundaries comprise hedgerows and some mature trees which provide a role for ecological networks. These should be retained where possible through new development proposals.

Climatic factors (including flood risk) In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding; the site located entirely within Flood Zone 1. The site is also not within an area at risk of surface water flooding.⁹

The site is located in good proximity to the services and facilities in Plaistow, including the shop, school, preschool and public house, which are all within easy walking distance. However given the lack of frequent public transport services serving the village, It is considered that development on this site is likely to result in increases in car use, with an associated increase in overall GhG emissions.

Landscape and historic environment The site is currently well screened and relatively enclosed, and would sit within the existing context of the village, with appropriate design and layout. As such it is likely that development of the site is not likely to lead to significant effects on landscape character in the area.

The Historic England/West Sussex CC Historic Landscape Characterisation lists the area of the site as early post-Medieval (i.e. AD 1500-1599) regular piecemeal enclosure (i.e. the enclosure of former heath, common, greens or open fields, either by Act of Parliament or by the actions of private landowners). The Kirdford Tithe Award (1847) lists the area as Kiln Field (arable).

The site is located just outside of the Plaistow Conservation Area, which borders the site to the north and west. Two listed buildings are located to the west of the site, across Rickman’s Lane, Stone House and Golden Cross. Given its more immediate proximity to and visibility from the site, development at this location is more likely to affect the setting of Stone House. As such development has the potential to affect the setting of the conservation area and listed building

⁹ <https://flood-warning-information.service.gov.uk/long-term-flood-risk>

SEA theme	Land Opposite the Green, Plaistow	
Land, soil and water resources	<p>It is not possible to confirm if the site will lead to a loss of Best and Most Versatile Agricultural Land as recent agricultural land classification on the site has not been undertaken. As such it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such).</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>	
Population and community	<p>The site is located with good proximity to local facilities, being located with good access to services and facilities in Plaistow, including the shop, school, pre-school, village green, village hall, playing field and public house. This will support the quality of life of residents.</p> <p>The site will deliver 11 dwellings, meeting local housing needs, which will incorporate at least 30% affordable housing.</p>	
Health and wellbeing	<p>Supporting the health and wellbeing of residents, the site is located with good proximity to local facilities in Plaistow, including the shop, school, pre-school, and public house. With these amenities accessible on foot, an allocation of housing at this location will support healthier and more active lifestyles. Health and wellbeing will be supported by the site's proximity to the village green, village hall and playing field.</p>	
Transportation	<p>Access from the road network to the site is relatively straightforward, with no significant issues.</p> <p>The site, like other locations in the Neighbourhood Plan area, is not accessible by frequent public transport links. Whilst the site is in good access to village facilities, an allocation at this site will lead to an increase in car use, due to the distance from other key services, facilities and frequent public transport links.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.3: Site: Land adjacent to Todhurst

SEA theme	Land adjacent to Todhurst
<p>Site size: 0.8ha</p>	
<p>Biodiversity and Geodiversity</p>	<p>The site is within an Impact Risk Zone for the Chiddingfold Forest SSSI for residential development of 100 dwellings or more. Given the size of the proposed allocation (11 dwellings) the proposed allocation is therefore unlikely to have significant effects on the status of the SSSI.</p> <p>The site comprises an area of deciduous woodland BAP Priority Habitat, with protected species likely to be present. As such development at the site has the potential to have significant impacts on habitats, species and ecological connections at this location.</p>
<p>Climatic factors (including flood risk)</p>	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding; the site located entirely within Flood Zone 1. Small areas of the site are at medium risk of surface water flooding.¹⁰</p> <p>The site is located in good proximity to the services and facilities in Plaistow, including the shop, school, preschool and public house, which are all within easy walking distance. However given the lack of frequent public transport services serving the village, It is considered that development on this site is likely to result in increases in car use, with an associated increase in overall GhG emissions.</p>
<p>Landscape and historic environment</p>	<p>Development of the site would lead to impacts on views from surrounding properties, however this will be mitigated by the provision of green space adjoining properties on Ashfield and Nell Ball/Back Lane. The loss of existing woodland on the site would lead to changes in villagescape character. The proposed development area of the site is not adjacent to listed buildings, although the wider site (incorporating the proposed areas of green space) is located close to three listed structures at Todhurst and listed buildings on Back Lane. The site also adjoins the Plaistow Conservation Area.</p>
<p>Land, soil and water resources</p>	<p>It is not possible to confirm if the site will lead to a loss of Best and Most Versatile Agricultural Land as recent agricultural land classification on the site has not been undertaken. As such it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such).</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>
<p>Population and community</p>	<p>The site is located with good proximity to local facilities, being located with good access to services and facilities in Plaistow, including the shop, school, pre-school, village green, village hall, playing field and public house. This will support the quality of life of residents.</p> <p>The site will deliver 11 dwellings, meeting local housing needs, which will incorporate at least 30% affordable housing.</p>

¹⁰ <https://flood-warning-information.service.gov.uk/long-term-flood-risk>

SEA theme	Land adjacent to Todhurst	
Health and wellbeing	Supporting the health and wellbeing of residents, the site is located with good proximity to local facilities in Plaistow, including the shop, school, pre-school, and public house. With these amenities accessible on foot, an allocation of housing at this location will support healthier and more active lifestyles. Health and wellbeing will be supported by the site's proximity to the village green, village hall and playing field.	
Transportation	Access to the site would be through the Nell Ball housing area. This has the potential to add to existing issues at the location relating to car access. The site, like other locations in the Neighbourhood Plan area, is not accessible by frequent public transport links. Whilst the site is in good access to village facilities, an allocation at this site will lead to an increase in car use, due to the distance from other key services, facilities and frequent public transport links.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.4: Site: Land adjacent to the Dairy¹¹

SEA theme	Land adjacent to the Dairy
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Site size: 0.8ha

Biodiversity and Geodiversity	<p>The site is within an Impact Risk Zone for the Chiddingfold Forest SSSI for residential development of 100 dwellings or more. Given the size of the proposed allocation (11 dwellings) the proposed allocation is therefore unlikely to have significant effects on the status of the SSSI.</p> <p>No BAP Priority Habitats are present on or adjacent to the site.</p> <p>The site comprises a number of areas of mature hedging and some significant mature trees. A number of these are located in the likely access point for development at the site.</p>
Climatic factors (including flood risk)	<p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding; the site located entirely within Flood Zone 1. The site is also not within an area at risk of surface water flooding.¹²</p> <p>The site is located in good proximity to the services and facilities in Plaistow, including the shop, school, preschool and public house, which are all within easy walking distance. However given the lack of frequent public transport services serving the village, It is considered that development on this site is likely to result in increases in car use, with an associated increase in overall GhG emissions.</p>
Landscape and historic environment	<p>A small section of the site and access to the site is located within the Plaistow Conservation Area, which borders the site to the north and west. Two listed buildings are located to the north of the site, Stone House and Golden Cross Cottages. Given its more immediate proximity to and visibility from the site, development at this location is more likely to affect the setting of the Golden Cross Cottages. As such development has the potential to affect the setting of the conservation area and listed building. The mature oak trees on sites are important elements of the villagescape.</p>
Land, soil and water resources	<p>It is not possible to confirm if the site will lead to a loss of Best and Most Versatile Agricultural Land as recent agricultural land classification on the site has not been undertaken. As such it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such).</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>
Population and community	<p>The site is located with good proximity to local facilities, being located with good access to services and facilities in Plaistow, including the shop, school, pre-school, village green, village hall, playing field and public house. This will support the quality of life of residents.</p> <p>The site will deliver 11 dwellings, meeting local housing needs, which will incorporate at least 30% affordable housing.</p>

¹¹ During the development of the Neighbourhood Plan, two iterations of the Dairy Site were considered. The assessment included in this Environmental Report considers the second iteration of the site, which incorporates enlarged boundaries encompassing an additional area of land. The Site Options and Assessment Report considered the early iteration of the site in early 2016.

¹² <https://flood-warning-information.service.gov.uk/long-term-flood-risk>

SEA theme	Land adjacent to the Dairy	
Health and wellbeing	Supporting the health and wellbeing of residents, the site is located with good proximity to local facilities in Plaistow, including the shop, school, pre-school, and public house. With these amenities accessible on foot, an allocation of housing at this location will support healthier and more active lifestyles. Health and wellbeing will be supported by the site's proximity to the village green, village hall and playing field.	
Transportation	Access from the road network to the site is relatively straightforward, with no significant issues. The site, like other locations in the Neighbourhood Plan area, is not accessible by frequent public transport links. Whilst the site is in good access to village facilities, an allocation at this site will lead to an increase in car use, due to the distance from other key services, facilities and frequent public transport links.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

4.3.5 Choice of site to take forward for the purposes of the Neighbourhood Plan

Following the consideration of the findings of the site assessments undertaken for the Neighbourhood Plan, consultation events and an ongoing consideration of viability and achievability, it was determined that the preferred approach for the Neighbourhood Plan is to allocate the Land opposite the Green site in Plaistow for eleven dwellings.

In relation to the Land adjacent to Todhurst site, this was not taken forward as the landowner stated it was unviable. Alongside, it was recognised that parking and traffic issues in the adjacent Nell Ball housing area would be exacerbated by additional housing. The water resources utility, Southern Water, also informed that they require unrestricted access to the pumping station for a 9m vehicle, which would incur further restrictions.

With regard to the Land adjacent to the Dairy site, it was established that the impact of providing an access to this site would result in potential harm to significant trees present on site and the hedge adjacent to the road verge. Alternative access points were also considered, but due to land ownership issues which were not able to be resolved, and issues relating to its deliverability and achievability, it was decided to discontinue the consideration of the site for the purposes of the Neighbourhood Plan.

As highlighted above, the latest version of the Chichester Site Allocation Development Plan Document allocates an alternative site for ten dwellings at the Land to the North of Little Springfield Farm in Ifold. To provide context on the potential decision to allocate the Land opposite the Green site for housing through the PIPNP instead of the Land to the North of Little Springfield Farm site, the SEA process has undertaken a comparative assessment of the two approaches.

The SEA process has therefore considered the following two options:

- **Option 1:** Deliver ten homes on the Land to the North of Little Springfield Farm site in Ifold
- **Option 2:** Deliver eleven homes on the Land opposite the Green site in Plaistow

Table 4.5 below presents appraisal findings in relation to the two options. These are organised by the seven SEA themes. These options have been appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). These were considered through the SEA Framework of objectives and assessment questions developed during scoping and the two options have been ranked in terms of their sustainability performance against the relevant SEA Theme.

For each SEA Theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the least favourable ranking.

Table 4.5: Appraisal findings: reasonable alternatives

Option 1: Deliver ten homes on the Land to the North of Little Springfield Farm site in Ifold

Option 2: Deliver eleven homes on the Land opposite the Green site in Plaistow

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Biodiversity and geodiversity	<p>The Land opposite to the Green site is within an Impact Risk Zone for the Chiddingfold Forest SSSI for residential development of 100 dwellings or more. It is also within an Impact Risk Zone for "All planning applications (except householder) outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures." Given the location of the site within the village, and the size of the proposed allocation (11 dwellings) the proposed allocation is therefore unlikely to have significant effects on the status of the SSSI.</p> <p>The Land to the North of Little Springfield site in Ifold is within an Impact Risk Zone for the Chiddingfold Forest SSSI relating to "All planning applications (except householder) outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures." Given the site is outside of the existing settlement boundary of Ifold, development at this location may have potential impacts on the SSSI without appropriate mitigation and avoidance measures.</p> <p>No BAP Priority Habitats are present on or immediately adjacent to the two sites being considered.</p> <p>Both sites' boundaries comprise hedgerows and some mature trees which provide a role for ecological networks.</p>	2	1
Climate change	<p>In relation to adapting to the effects of climate change, the Land opposite to the Green site is not located within identified flood risk zones for fluvial flooding; the site located entirely within Flood Zone 1. The site is also not within an area at risk of surface water flooding. The southern boundary of the Land to the North of Little Springfield site is at 'medium' risk of fluvial flooding and is also at risk of surface water flooding. However this comprises a small part of the site and is not a significant constraint to development.</p> <p>The Land opposite to the Green site is located in good proximity to the services and facilities in Plaistow, including the shop, school, preschool and public house, which are all within easy walking distance. The Land to the North of Little Springfield site is located in Ifold, which does not have a shop, church, school or pub. As such, locating development in Plaistow through Option 2, through limiting the need to travel for services and facilities has more potential than Option 1 to limit emissions from transport.</p>	2	1

Option 1: Deliver ten homes on the Land to the North of Little Springfield Farm site in Ifold

Option 2: Deliver eleven homes on the Land opposite the Green site in Plaistow

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Landscape and historic environment	<p>Both sites are currently well screened and relatively enclosed, and would sit within the existing context of the two settlements, with appropriate design and layout. As such both options are unlikely to lead to significant effects on wider landscape character in the area.</p> <p>The Land opposite to the Green site is located just outside of the Plaistow Conservation Area, which borders the site to the north and west. Two listed buildings are located to the west of the site, across Rickman's Lane, Stone House and Golden Cross. Given its more immediate proximity to and visibility from the site, development at this location is more likely to affect the setting of Stone House. As such development has the potential to affect the setting of the conservation area and listed buildings.</p> <p>In contrast, the Land to the North of Little Springfield site is not within the setting of listed buildings, and no conservation areas are present locally. Overall therefore, Option 1 is less likely to have significant impacts on the historic environment.</p>	1	2
Land, soil and water resources	<p>It is not possible to confirm if development at the sites will lead to a loss of Best and Most Versatile Agricultural Land as recent agricultural land classification on the two sites has not been undertaken. Pre-1988 classification suggests that land at the two sites is classified as Grade 3 land. As such it is not possible to differentiate between Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) and Grade 3b land (which is land not classified as such).</p> <p>The sites are not located in a Groundwater Source Protection Zone.</p>	?	?
Population and community	<p>Plaistow has by far the broadest range of services and facilities in the Neighbourhood Plan area. These include a school, pre-school, shop, village green, childrens' playground, village hall, church, football field and public house. In contrast, services and facilities in Ifold are largely limited to a village hall. In this context Option 2, through focusing housing in the settlement with the broader range of amenities, will do more to promote the location of new housing in accessible locations. This will help limit the need for residents to travel for day-to-day services and facilities, supporting their quality of life.</p> <p>The sites will deliver 10 and 11 dwellings respectively, which will incorporate at least 30% affordable housing. Both options will therefore meet help local housing needs.</p>	2	1
Health and Wellbeing	<p>Option 2 will direct housing to Plaistow rather than Ifold. This will enhance accessibility through directing housing to the settlement with the broadest range of services and facilities, as well as enabling access to Plaistow's village green, village hall and playing field. This will have benefits for the health and wellbeing of residents.</p> <p>Locating more housing in closer proximity to the facilities available in the parish through Option 2 will also do more to the support quality of life and wellbeing through promoting walking and cycling and active lifestyles.</p>	2	1

Option 1: Deliver ten homes on the Land to the North of Little Springfield Farm site in Ifold

Option 2: Deliver eleven homes on the Land opposite the Green site in Plaistow

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Transportation	<p>Both sites, like other locations in the Neighbourhood Plan area, are not accessible by frequent public transport links, and are overall likely to lead to an increase in car use, due to the distance from other key services, facilities and frequent public transport links.</p> <p>However, Option 2, through focusing housing in Plaistow, which is the settlement with the broadest range of services and facilities in the Neighbourhood Plan area, including a school, pre-school, shop, village green, childrens' playground, village hall, church, football field and public house, will help reduce the need to travel for certain amenities, and support sustainable modes of travel, including walking and cycling. Option 1, through focusing housing in Ifold, which is a settlement with a more limited range of services and amenities, will do less to promote the location of new housing in accessible locations. This will increase the need for residents to travel for day-to-day services and facilities.</p>	2	1

4.4 Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

To support the implementation of the vision for the Neighbourhood Plan discussed in Section 2.2, the current Submission version of the PIPNP puts forward 17 policies to guide development in the Neighbourhood Plan area. One of these policies, Policy H1, allocates the Land opposite the Green site in Plaistow for eleven dwellings.

The policies, which were developed following extensive community consultation and evidence gathering, and refined following Regulation 14 consultation, are as follows:

Table 4.6: Plaistow and Ifold Parish Neighbourhood Plan policies

Environmental and Heritage

EH1	Protection of Heritage Assets
EH2	Protection of Natural Environment
EH3	Protection of Trees, Woodlands and Natural Vegetation
EH4	Local Green Spaces
EH5	Artificial Lighting Emissions (External Lighting on Buildings)
EH6	Street Lighting

Community Infrastructure

CI1	Reducing and Avoiding Flood Risk
CI2	Connecting to Technology Networks

Housing

H1	Allocated Site (Land opposite The Green, Plaistow)
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H2	Housing Development within the Ifold Settlement Boundary
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H3	Affordable Housing
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H4	Housing Density and Design Principles
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Economy and Employment

EE1	Live/Work Facilities
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EE2	Supporting the Local Economy
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EE3	Retail Shop Premises
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EE4	Brownfield Site
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Transport

T1	Ensuring Highway Safety
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5. What are the appraisal findings at this current stage?

5.1 Introduction

The aim of this chapter is to present appraisal findings and recommendations in relation to the current Submission version of the PIPNP. This chapter is structured as follows:

Sections 5.3 to 5.9 present an appraisal of the Submission version of the PIPNP under the seven SEA theme headings; and

Section 5.10 subsequently discusses overall conclusions at this current stage and recommendations for the next stage of plan-making.

5.2 Approach to the appraisal

The appraisal is structured under the seven themes considered through the SEA.

For each theme, the 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

5.3 Biodiversity and Geodiversity

Key sites of biodiversity importance for the Neighbourhood Plan area include the nationally designated Chiddingfold Forest SSSI and Shillinglee Lake SSSI. Given the proposed size of allocation taken forward by the Neighbourhood Plan, and its location at the Land opposite the Green site, the Neighbourhood Plan will not lead to adverse effects on the integrity of these biodiversity designations. Similarly, the allocation will not lead to the loss of BAP Priority Habitats or have significant impacts on habitats which support protected species. The policy for the allocation (Policy H1) also allows for the retention of existing mature trees and hedges and makes provision for suitable native species landscaping to replace any landscaping that may be lost. This will help limit potential impacts on biodiversity from the development of the site for housing, and support enhancements.

More broadly, a variety of policies put forward in the Neighbourhood Plan have either a direct or indirect impact upon biodiversity. Policy EH2 (Protection of Natural Environment) seeks to ensure that new development that does not conserve or enhance biodiversity within designated nature conservation areas, or which results in the loss or deterioration of irreplaceable habitats such as ancient woodland and key trees and hedgerows, is precluded. This is supported by Policy EH3 (Protection of Trees, Woodlands and Natural Vegetation), which seeks to ensure that the loss of trees of good arboricultural, significant landscape or amenity value, either individually or as a group is resisted. Specifically in Ifold, this will be further supported by Policy H2 (Housing Development within the Ifold Settlement Boundary), which seeks to ensure that new development in Ifold does not result in the loss of valuable trees, hedges or other natural features.

In relation to other policies which will support biodiversity, the allocation of nine Local Green Spaces across the parish through Policy EH4 (Local Green Spaces) will also support ecological networks in the Neighbourhood Plan area. The two policies which seek to manage street lighting and other artificial

lighting (Policy EH5, Artificial Lighting Emissions (External Lighting on Buildings), and Policy EH6, Street Lighting), will also help reduce impacts on nocturnal and crepuscular species from light pollution.

In light of the policies discussed above, the PIPNP will help prevent fragmentation, loss and deterioration of habitats and ecological connections in the Neighbourhood Plan area, and support biodiversity enhancements. As such, the policies offer a proactive approach to protecting and enhancing habitats and species and ecological networks in the Neighbourhood Plan area.

5.4 Climatic factors (including flood risk)

In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area.

The allocated housing site is located in good proximity to the services and facilities in Plaistow, including the shop, school, pre-school, village green, village hall, playing field and public house, which are all within easy walking distance. This will support climate change mitigation through limiting the need for residents to travel by the private car for these amenities. Furthermore, the Neighbourhood Plan also supports home working through Policy EE1 (Live/Work Facilities) and promotes enhanced telecommunications infrastructure improvements through Policy CI2 (Connection to Technology Networks). This will help to minimise the need for people to travel.

While it is considered that the policies of the PIPNP will help limit the need to travel and promote modal shift, it is recognised that the introduction of eleven new homes may result in an increase in vehicle trips and therefore increase in greenhouse gas emissions. However, likely effects have been minimised through the selection of an identified site that is within the settlement of the Neighbourhood Plan area most accessible to services and facilities, Plaistow.

The PIPNP's focus on the protection and enhancement of woodland and hedgerows and green spaces will promote climate change mitigation through supporting carbon sequestration, and climate change adaptation by helping to limit the effects of extreme weather events and regulating surface water run-off (Policies EH2-4 and Policies H1 and H2). The policies supporting biodiversity in the Neighbourhood Plan area (**Section 5.3**) will further help to increase the resilience of ecological networks to the effects of climate change through making provision for improvements to habitats and enhancing such networks.

In relation to flood risk in the Neighbourhood Plan area, the addressing of issues linked to fluvial and surface water flooding are likely to be supported by the provisions of the NPPF. Likewise, the flood risk, SuDs and surface water flooding policies proposed by the Chichester Local Plan would further help limit adverse effects in this regard. However the PIPNP seeks to implement additional provisions relating to flood risk in the Neighbourhood Plan area. This includes through seeking to minimise the risk of surface water run-off and limiting impacts on adjoining sites to new development, and ensuring that adequate surface water and foul water capacity is provided alongside new development.

5.5 Landscape and Historic Environment

The proposed site allocation for the PIPNP at the Land opposite The Green is in a location of some sensitivity for the historic environment. As such negative effects on the historic environment have the potential to take place from a site allocation at this location with inappropriate design and layout. This is recognised by the policy for the allocation (Policy H1), which sets out a range of provisions for protecting and enhancing the quality of the villagescape at this location and the setting of the historic environment. This includes through: seeking to respond positively to the character of the area and initiating design which reflects the village vernacular, protects the setting of the Plaistow Conservation Area and three listed buildings located nearby; retains key landscape features such as trees and hedgerows; and initiates new planting.

No development proposals are taken forward through the PIPNP within the part of the Neighbourhood Plan area within the South Downs National Park.

Within Ifold, Policy H2 (Housing Development within the Ifold Settlement Boundary) has a strong focus on protecting and enhancing the public realm and supporting the local distinctiveness of the settlement. This includes through: seeking to prevent the over-development of the site in relation to the existing characteristics of neighbouring sites in respect of built form, massing and building line; limiting impacts on designated and non-designated heritage assets; precluding the loss of valuable trees, hedges or other natural features that form part of the character of the settlement; and facilitating appropriate densities.

Policy H4 (Housing Density and Design Principles) seeks to ensure that new residential development in the Neighbourhood Plan area is of a density which is *'in keeping with existing densities in the surrounding area and utilises design and materials which are in keeping with the character of the area and local distinctiveness, having regard to the scale, massing, bulk, appearance and site layout of development in the surrounding area'*. Policy EE1 (Live/Work Facilities) and Policy EE2 (Supporting the Local Economy) will also support local distinctiveness through seeking to limit impacts from new live/work facilities and employment provision in the Neighbourhood Plan area on local character. Specifically directed to the historic environment, Policy EH1 (Protection of Heritage Assets) also seeks to protect and enhance the integrity of the setting of heritage assets in the Neighbourhood Plan area.

A number of the policies (including H1, H2 and H4) seek to ensure that new development areas conform to the relevant Village Design Statement, when prepared. In this context the Village Design Statement will provide a robust basis for the protection and enhancement of the landscape and villagescape quality and the historic environment in the vicinity of the Neighbourhood Plan area's settlements. This includes through setting out features which local people regard as important and suggesting ways in which these can be maintained and enhanced through a series of development guidelines.

Overall, the policies outlined above provide an appropriate basis for the conservation and enhancement of landscape and villagescape character in the Neighbourhood Plan area and the conservation of historic environment assets and their settings.

5.6 Land, Soil and Water Resources

Policy EE4 (Brownfield Site) promotes the reuse of the redundant and previously developed land available at Little Springfield Farm for light industrial, retail and residential land. This will support the efficient use of land. The proposed residential site allocation for eleven dwellings at Land opposite the Green in Plaistow will however take place on undeveloped land. Recent land classification has not been undertaken in this area; as such it is not possible to confirm between whether the land comprises Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) or Grade 3b land (which is land not classified as such). The site allocation is not located within a Groundwater Source Protection Zone.

A number of the policies seek to protect trees, woodland and hedgerows, aim to protect designated sites, areas of landscape sensitivity and promote green space and open space (**Section 5.3** and **5.5**). While these policies do not specifically relate to land, soil and water resources, the policies will help promote and protect these resources, including through the promotion of high quality green networks in the Neighbourhood Plan area and the protection and enhancement of key landscape features.

5.7 Population and Community

As taken forward through Policy H1 (Land opposite The Green, Plaistow), the current version of the PIPNP allocates one site for housing, with a provision totalling in eleven dwellings. As this is anticipated to exceed the requirements of the Chichester Local Plan (ten dwellings), it is assumed that this growth quantum will meet the objectively assessed housing needs arising locally. The location of the shortlisted site is also considered to be sustainable due to the wider range of services available in Plaistow when compared to other settlements in the Neighbourhood Plan area, notably: a shop,

school, pre-school, village green, village hall, playing field and public house. This will support accessibility and help reduce the need to travel for key services and facilities.

A key aim of the Neighbourhood Plan is to ensure that housing delivered in the Parish is of a type and tenure which is appropriate for local needs. As such, Policy H3 (Affordable Housing) states that the development should contain a mixture of housing types and sizes to suit the demographics of the parish. Additionally, Policy H4 (Housing Density and Design Principles) and Policy EH5 (Lighting Emissions) highlight how the design and materials used within the development should maintain the distinctiveness of the area, important for preserving the setting of the Plaistow Conservation Area and the nearby listed buildings. This will support the satisfaction of residents with their neighbourhood as a place to live.

The Neighbourhood Plan area has a highly skilled workforce, with a higher proportion of residents employed in managerial, directorial and senior official occupations. Maintaining and enhancing the economic vitality of the Neighbourhood Plan is recognised through a range of policies aimed at supporting continued growth. For example, Policy EE2 (Supporting the Local Economy) states that development proposals which would result in the loss of employment-generating uses or business premises will be resisted. Additionally, Policy EE1 (Live/Work Facilities) supports the use of dwellings as live/work units in order to encourage local businesses. Furthermore, Policy EE4 (Brownfield Site) states that mixed-use development will be encouraged on Land at Little Springfield Farm to include light industrial, retail and residential units. All of these policies directly align with the vision of the Neighbourhood Plan by protecting the quality of life of those living and working within the Neighbourhood Plan area, and allowing the settlements to evolve in an appropriate manner.

With regards to the community vitality of the Neighbourhood Plan area, Policy CI2 (Connecting to Technology Networks) aims to ensure that all new development (both residential and business) provides high speed broadband in order to keep the Neighbourhood Plan area connected to the digital environment. This directly links to Policy EE1 (Live/Work Facilities) outlined above, and helps to provide a platform for residents to pursue both social and economic opportunities. Overall, there are a number of policies within the Neighbourhood Plan which recognise the importance of promoting sustainable growth and supporting community vitality.

5.8 Health and Wellbeing

The most recent Joint Strategic Needs Assessment (JSNA)¹³ for West Sussex was written to describe the current and future health, social care and wellbeing needs of the local population, and raises important challenges for discussion. The overarching themes of the JSNA focus on the importance of starting well, preventing inequalities, promoting good mental and physical health, and ensuring a good quality of life for the 'whole person' through recognising that there are many factors which directly and indirectly link to health and wellbeing. As such, the policies contained within the Neighbourhood Plan will bring a range of benefits for the health and wellbeing of residents living in the Neighbourhood Plan area, in addition to addressing some of the challenges identified within the JSNA.

Supporting health and wellbeing, there is a strong focus on delivering suitable housing for the different age groups and housing needs represented in the Neighbourhood Plan area. For example, Policy H1 (Land opposite The Green, Plaistow) identifies the need for new residential development to include small one, two and three bedroom units, with some accommodation suitable for older residents. Additionally, Policy CI2 (Connecting to Technology Networks) aims to ensure that all new development (both residential and business) provides high speed broadband in order to keep the Neighbourhood Plan area connected to the digital environment, This will help to support social networks. Furthermore, Policy T1 (Ensuring Highway Safety) outlines the requirement for new development to provide safe and appropriate access, along with appropriate levels of off-street parking. This is particularly important from a health wellbeing perspective, in terms of enabling local residents to safely access local services and amenities, and supporting road safety.

¹³ West Sussex County Council (2014) Joint Strategic Needs Assessment [online] available to access via:
<http://jsna.westsussex.gov.uk/reports/joint-strategic-needs-assessment-report/>

There is now robust evidence that access to the natural environment improves people's health and wellbeing through encouraging healthy outdoor recreation and relaxation. In this context, a number of policies within the Neighbourhood Plan aim to protect and enhance the accessibility to open spaces. For example, Policy EH4 (Local Green Spaces) aims to designate nine areas as local green spaces, and protect them against any future development. Additionally, Policy EH1 (Protection of Heritage Assets), Policy EH2 (Protection of the Natural Environment) and Policy EH3 (Protection of Trees, Woodlands and Natural Vegetation) also aim to safeguard and enhance the features which indirectly contribute to the quality of life of the local residents in the parish.

Overall, the policies' focus on the health and wellbeing of residents supports the vision of the Neighbourhood Plan, which is to protect the sense of community, the safety, and the rural tranquillity of the parish, along with safeguarding and enhancing the factors which directly and indirectly help to achieve a high quality of life for the community.

5.9 Transportation

The proposed site allocation at the Land opposite The Green, Plaistow (Policy H1) is located in good proximity to the services and facilities in Plaistow, including the a shop, school, pre-school, village green, village hall, playing field and public house, which are all within easy walking distance. Recognising that the Neighbourhood Plan area is poorly served by public transport networks, this will support accessibility and help reduce the need to travel to some key services and facilities.

Policy T1 (Ensuring Highway Safety) emphasises a requirement for new development to provide appropriate levels of off-street parking along with sufficient road widths to accept emergency and delivery vehicles. This is further supported through Policy H4 (Housing Density and Design Principles), which outlines the importance of providing satisfactory road access so that it does not result in increased danger and inconvenience to other highway users, including pedestrians and cyclists.

Overall, the policies within the Neighbourhood Plan relating to the transportation environmental theme are tailored towards the particular needs of the parish, with a requirement for new development to provide suitable and safe road access along with an appropriate amount of parking space for privately owned vehicles. Due to the rural setting of the Neighbourhood Plan area, and the scope of the Neighbourhood Plan, there are limited opportunities to significantly enhance the public transport network and reduce the reliance of privately owned vehicles. Due to the relatively limited scale of growth proposed through the Neighbourhood Plan though, it is unlikely that there will be a significant impact on the wider road network in the parish.

5.10 Conclusions at this current stage

5.10.1 Potential significant effects

The appraisal has concluded that the current version of the PIPNP is likely to lead to **significant positive effects** in relation to the 'population and community' and 'health and wellbeing' sustainability objectives. These benefits largely relate to the carefully targeted spatial approach proposed by the draft plan, the focus on improving the quality of life of residents in the Neighbourhood Plan area and the Neighbourhood Plan's impetus on protecting and enhancing open space and the quality of the public realm.

In addition, the Neighbourhood Plan has a strong focus on protecting and enhancing landscape and villagescape character and the setting of the historic environment, leading to **significant positive effects** in relation to the 'landscape and historic environment' theme.

The current version of the PIPNP will initiate a number of beneficial approaches regarding the 'biodiversity', 'transportation', 'land, soil and water resources' and 'climatic factors' sustainability themes. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

6. What are the next steps?

This Environmental Report accompanies the PIPNP for submission to the Local Planning Authority, Chichester District Council, for Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Chichester Local Plan.

If Independent Examination is favourable, the PIPNP will be subject to a referendum, organised by Chichester District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the PIPNP will become part of the Development Plan for Plaistow & Ifold Parish.

Appendix A Context review and baseline

A.1 Air Quality

Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan'.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

In terms of the local context, Chichester District Council is required to monitor air quality across the county under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO₂), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area. As such the Chichester District AQAP; Towards Better Air Quality, An Air Quality Action Plan for Chichester District 2015-2020¹⁴ was created for the three AQMAs within Chichester District. All three of the AQMAs were designated for exceeding annual mean Nitrogen Dioxide (NO₂). The AQAP sets out actions to positively impact the local air quality, including measuring, model and reporting on air quality, to encourage low emission technology and encourage and foster behavioural change/modal shift.

Summary of current baseline

No AQMAs are located within the PIPNP area, and only three have been designated within Chichester District, as follows:

- Stockbridge roundabout at the junction with the A27 and A286;
- Orchard Street, Chichester; and
- St Pancras, Chichester.

These three areas are all located within Chichester city centre, and are c.25 – 30km from the PIPNP. These are all designated due to exceedances in annual NO₂, which is attributable to road traffic and congestion in the area. The 2016 Chichester District Council Air Quality Annual Status Report states that air quality with regard to NO₂ in Chichester District is improving or staying the same in all monitored locations, which meant it was not necessary to declare any further AQMAs, however the status of the pre-existing AQMAs could not be updated as levels were still above the air quality objective.

In terms of key installations present locally with the potential to affect air quality, the biogas plant located at Crouchland Farm, Rickmans Lane, Plaistow is likely to have some contribution to air pollutants in the Neighbourhood Plan area, both from the installation itself and traffic movements.

Overall however, air quality within the Neighbourhood Plan area itself is generally very good.

¹⁴ Chichester District Council Air quality review and assessment – Air Quality Action Plan for Chichester District 2015-2020

Summary of future baseline

Whilst no significant air quality issues currently exist within the PIPNP area, new employment and or housing provision within the Neighbourhood Plan has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO₂.

Areas of particular sensitivity to increased traffic flows are likely to be the village centres and the routes with largest congestion issues. However these effects may be offset in part by factors such as measures implemented through the Chichester District Council Local Plan and the West Sussex Local Transport Plan, which may alter traffic flows and encourage public transport use.

It should be noted though that the existing baseline for air pollutants is very low in Plaistow and Ifold Parish, and significant air quality issues are unlikely to arise with moderate increases in traffic flows.

A.2 Biodiversity

Context Review

At the European level, the EU Biodiversity Strategy¹⁵ was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

Key messages from the National Planning Policy Framework (NPPF) include:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities').
- Plan positively for 'green infrastructure' as part of planning for 'ecological networks'.
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

The Natural Environment White Paper (NEWP)¹⁶ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;

¹⁵ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf> last accessed [15/05/17]

¹⁶ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed [15/05/17]

- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to *'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'*¹⁷.

Policy 49: Biodiversity of the Adopted Chichester Local Plan: Key Policies 2014-2019 states that planning permission will be granted for development where it can be demonstrated that all the following criteria have been met:

1. The biodiversity value of the site is safeguarded;
2. Demonstrate harm to habitats or species which are protected or which are of importance to biodiversity is avoided or mitigated;
3. The proposal has incorporated features that enhance biodiversity as part of good design and sustainable development;
4. The proposal protects, manages and enhances the District's network of ecology, biodiversity and geological sites, including the international, national and local designated sites (statutory and non-statutory), priority habitats, wildlife corridors and stepping stones that connect them;
5. Any individual or cumulative adverse impacts on sites are avoided; and
6. The benefits of development outweigh any adverse impact on the biodiversity on the site. Exceptions will only be made where no reasonable alternatives are available; and planning conditions and/or planning obligations may be imposed to mitigate or compensate for the harmful effects of the development.

This policy has a close focus on preventing disturbance of birds in Special Protection Areas.

¹⁷ DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>> last accessed [03/04/17]

- LEGEND**
- Plaistow and Ifold Parish Neighbourhood Plan Area
 - Special Area of Conservation (SAC)
 - Site of Special Scientific Interest (SSSI)

Biodiversity Action Plan Priority Habitats

- Deciduous Woodland
- Good Quality Semi-improved Grassland
- Lowland Fens
- Lowland Meadows
- Traditional Orchard

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Purpose of Issue **DRAFT**

Client **PLAISTOW AND IFOLD PARISH NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title **PLAISTOW AND IFOLD PARISH NEIGHBOURHOOD PLAN**

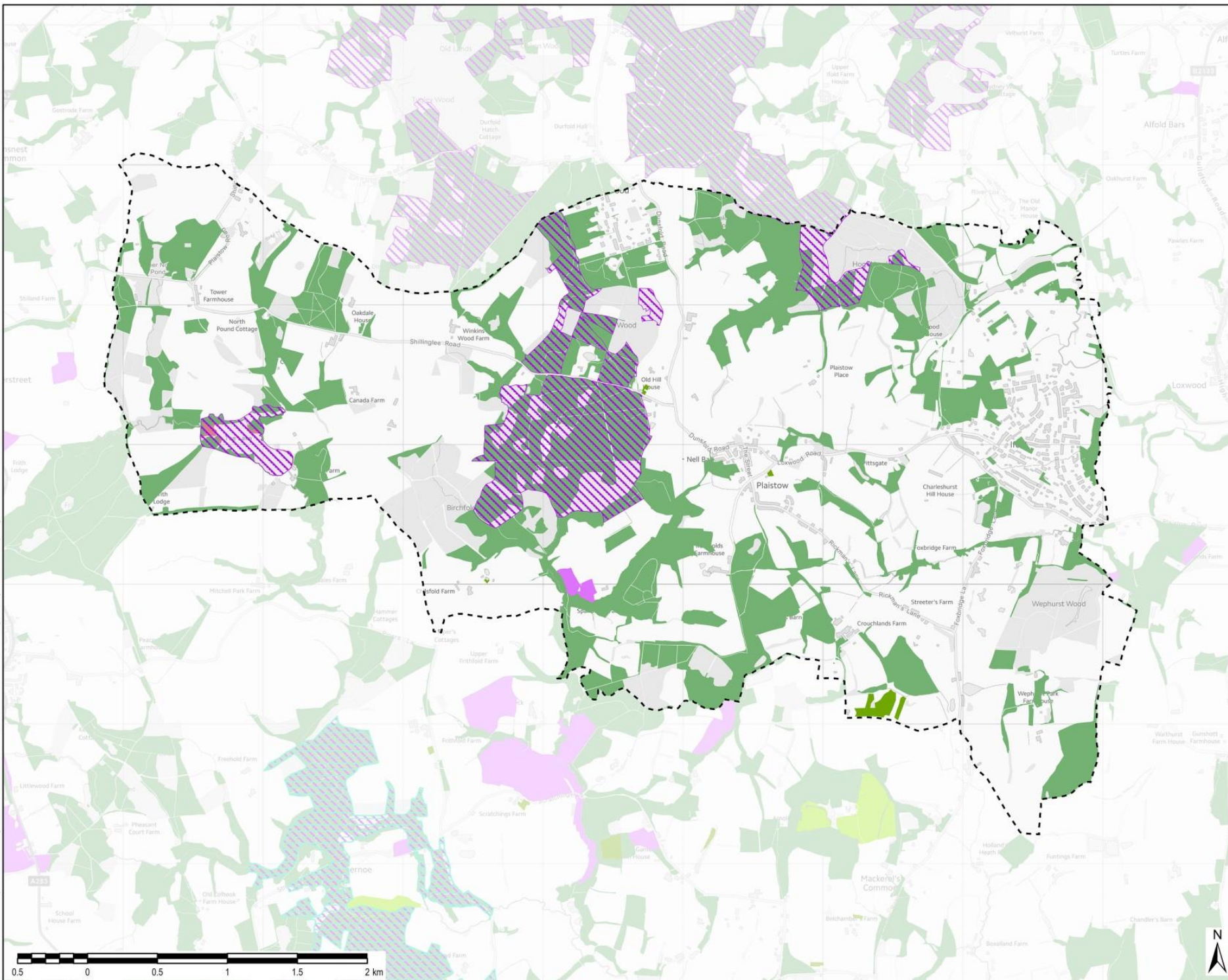
Drawing Title **BIODIVERSITY DESIGNATIONS AND HABITATS**

Drawn CN	Checked JW	Approved NCB	Date 15/05/2017
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Summary of current baseline

European Designated Sites (Ramsar Sites/SPA/SAC)

The Ebernoe Common Special Area of Conservation (SAC) lies less than 1km south of the Neighbourhood Plan area and about 3km south west of Plaistow village. The SAC is 235ha, which consists entirely of woodland, the majority of which is broadleaved deciduous. The area was designated primarily for the presence of Annex I habitat; '9120 *Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion)*'. There are also two Annex II species which were a primary reason for the selection of the site; these are 1308 *Barbastelle* and 1323 *Bechstein's bat*. Additionally, The Mens SAC is approximately 7km to the south of the Neighbourhood Plan area, and is 204ha. Similar to The Ebernoe Common SAC, The Mens consists entirely of broad-leaved deciduous woodland and was designated primarily for the presence of Annex I habitat; '9120 *Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion)*'. The Annex II listed *Barbastelle* bat is also recognised as a qualifying feature. Although these European protected sites are outside of the Neighbourhood Plan area, habitats and commuting/foraging routes for the bats may extend into the Neighbourhood Plan area.

Furthermore, the Neighbourhood Plan area contains nationally designated sites and a variety of BAP Priority habitats and species, as discussed below.

Nationally Designated Sites (SSSIs/NNRs)

Shillinglee Lake SSSI

Shillinglee Lake SSSI is located within the north western corner of the Neighbourhood Plan area, within the South Downs National Park boundary. The SSSI is 17ha and was designated in 1985 under Section 28 of the Wildlife and Countryside Act 1981. The area is characterised by The Lake which covers the majority of the SSSI. The SSSI was notified for the important flora which the lake supports, four species of which are nationally uncommon. The citation states¹⁸:

'Stands of marginal fen vegetation fringe the lake and include reed canary grass Phalaris arundinacea, reed-mace Typha latifolia, bulrush Schoenoplectus lacustris, branched bur-reed Sparganium erectum, water mint Mentha aquatica and marsh woundwort Stachys palustris. This marginal fen grades into variable woodland in which pedunculate oak Quercus robur, ash Fraxinus excelsior, hazel Corylus avellana, downy birch Betula pubescens, alder Alnus glutinosa and white willow Salix alba are all present. The ground flora of these woods varies from one with the typical fen plants noted above to a drier type in which bramble Rubus fruticosus and bracken Pteridium aquilinum are dominant.

Four nationally rare plants occur in the lake making the site nationally significant for its flora. The rarest of the four is the cut grass Leersia oryzoides which is confined to ten UK sites – two of them in West Sussex. The mudwort Limosella aquatica has its only Sussex location here whilst needle spike rush Eleocharis acicularis and 6 stamened water-wort Elatine hexandra also occur. The latter three plants are found on muds exposed during periods of drought or on other occasions when the water level of the lake is low.'

The latest condition assessment of Shillinglee Lake SSSI was undertaken in 2012, with all of the area classified as unfavourable – recovering.

Chiddingfold Forest SSSI

Chiddingfold Forest covers an area of 543.9ha, in the majority covering an area north of the PIPNP, some of which lies within the Surrey Hills Area of Outstanding Natural Beauty. The SSSI was notified in 1991 under Section 28 of the Wildlife and Countryside Act 1981. The site lies within the Low Weald Natural Area. The Chiddingfold SSSI consists of a number of areas of woodland which together form a

¹⁸ Natural England (no date): Shillinglee Lake SSSI [online] available to access via:
<<https://necmsi.esdm.co.uk/PDFsForWeb/Citation/1000734.pdf>> last accessed [05/05/17]

large continuous network. It consists of a mixture of woodland types ranging from ancient oak woodland to coniferous plantation, including many semi-natural types of woodland. The woodland habitats support habitats for a rich variety of insects and invertebrates, as well as breeding birds. The citation for Chiddingfold Forest SSSI states¹⁹:

'The forest lies mainly on the Weald Clay which gives rise to neutral to slightly acidic soils, but there are parts, particularly in the gills, which are more basic (lime rich) with local outcrops of Paludina Limestone. Some of the higher parts are more acidic; these tend to have more silty or sandy soils, and heathland species occur on rides in these areas. The site is linked to other woodland areas and forms part of a much larger, but discontinuous, area of forest.'

'The importance of the site principally rests on the variety of woodland types present which provide a complex mosaic of habitats. The oldest semi-natural broadleaf areas are dominated by sessile oak Quercus petraea and hornbeam Carpinus betulus, with hazel Corylus avellana forming the bulk of the shrub layer with occasional holly Ilex aquifolium, and hawthorn Crataegus monogyna. Silver birch Betula pendula is found in dryer areas. The herb layer is composed of such species as bluebell Hyacinthoides non-scriptus, enchanter's nightshade Circaea lutetiana and honeysuckle Lonicera periclymenum.'

The SSSI is split into 21 units, four of which lie within the PIPNP, a condition assessment was last undertaken for these sites in 2009 the results were as follows;

- Unit 01: broadleaved, mixed and yew woodland – lowland. This site is 98.7ha, and was classified as unfavourable – recovering.
- Unit 02: broadleaved, mixed and yew woodland – lowland. This site is 19.5ha, and was classified as unfavourable – recovering.
- Unit 03: broadleaved, mixed and yew woodland – lowland. This site is 12.9ha, and was classified as unfavourable – recovering.
- Unit 13: broadleaved, mixed and yew woodland – lowland. This site is 17.9ha, and was classified as unfavourable – recovering.

Overall five of the 21 units across the SSSI were favourable, with the rest classified as unfavourable – recovering.

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs.

The majority of the Neighbourhood Plan area lies within an IRZ for one or more SSSI, with areas around Plaistow village and the settlement of Ifold, lying within an IRZ for 'Residential development of 100 units or more'.

Biodiversity Action Plan habitats

The Biodiversity Action Plan (BAP) habitats²⁰ located within the Neighbourhood Plan include:

- Good Quality Semi – Improved Grassland (non-priority) – Sparwood Farm
- Lowland Fen – Small areas surrounding The Lake within the South Downs National Park.
- Ancient and semi-natural woodland – A variety of areas at locations such as:
 - Wephurst

¹⁹ Natural England (no date): Chiddingfold Forest SSSI [online] available to access via: <<https://necmsi.esdm.co.uk/PDFsForWeb/Citation/1005561.pdf>> last accessed [05/05/17]

²⁰ MAGIC (2017): 'Interactive Mapping Tool' [online] available to access via: <<http://www.magic.gov.uk/MagicMap.aspx>> last accessed [05/05/17]

- Roundwych Copse
- Sparwood Hangar
- Limekiln Wood
- Hardnips Copse
- Hog Copse
- Barn Wood
- East of Ifold next to the River Lox
- Little Headfoldswood Copse
- Copse Corner, Ifold
- Ancient Woodland found in the centre of Ifold to the rear of houses in The Ride, Chalk Road and The Close.
- Ancient replanted woodland – at a variety of locations such as:
 - Ashpark Wood
 - Kingspark Wood
 - Birchfield Copse
 - Hog Wood
 - Manorhill Copse
 - Wephurst Wood
- Deciduous woodland – Covers large areas of the PIPNP area, including Kingspark Wood
- Traditional Orchards – found in three areas:
 - Lanelands at the south of the PIPNP area;
 - A small area in the centre of Plaistow; and
 - A small area further north of Plaistow, east of Ashpark Wood.
- Woodpasture and Parkland – a large area to the north–west of the parish, with almost the same boundary as the National Park.

Figure 3.1 shows the designated biodiversity sites located within the Neighbourhood Plan area.

Summary of future baseline

Habitats and species have the potential to come under increasing pressures from housing and infrastructure development in the Neighbourhood Plan area, including nationally and locally designated sites. This includes a loss of habitats and impacts on biodiversity networks. This may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.

Benefits for biodiversity have the potential to arise from the increasing integration of biodiversity considerations within decision making, including sub-regional green infrastructure work being undertaken by Natural England, Chichester District Council, West Sussex County Council, the South Downs National Park Authority and other organisations.

A.3 Climatic Factors

Context Review

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report to achieve the following:

- *'Based on the latest understanding of current, and future, climate risks and opportunities, vulnerability and adaptation, what should the priorities be for the next UK National Adaptation Programme?'*²¹

The evidence report contains six priority risk areas requiring additional action in the next five years, see below:

1. Flooding and coastal change risks to communities, businesses and infrastructure;
2. Risks to health, well-being and productivity from high temperatures;
3. Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
4. Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
5. Risks to domestic and international food production and trade; and
6. New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

The UK Climate Change Act²² was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

- 2050 Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
- Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page²³.

Key messages from the National Planning Policy Framework (NPPF) include:

²¹ GOV.UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from: <<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>> last accessed [27/01/17]

²² GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [21/02/17]

²³ Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/>> last accessed [21/02/17]

- Support the transition to a low carbon future in a changing climate as a 'core planning principle'.
- There is a key role for planning in securing radical reductions in greenhouse gas (GHG) emissions, including in terms of meeting the targets set out in the Climate Change Act 2008²⁴. Specifically, planning policy should support the move to a low carbon future through:
 - Planning for new development in locations and ways which reduce GHG emissions;
 - Actively supporting energy efficiency improvements to existing buildings;
 - Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
 - Positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
 - Encouraging those transport solutions that support reductions in GHG emissions and reduce congestion.
- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act²⁵ highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS)²⁶

Further guidance is provided in the document 'Planning for SuDS'.²⁷ This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

A Strategic Flood Risk Assessment (SFRA)²⁸ was undertaken in 2008 for Chichester District Council. This SFRA creates a framework for the consideration of flood risk when making planning decisions, and was developed as part of the Local Development Framework. Flood risk across the District is discussed alongside information regarding flood defences and flood warning. Flooding is also considered in the future, aiming to predict likely impacts of climate change on flooding in the district.

²⁴ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.

²⁵ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

²⁶ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDS.

²⁷ CIRIA (2010) 'Planning for SuDS – making it happen' [online] available to access via <http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx> last accessed [04/04/17]

²⁸ Chichester District County Council (2008) Strategic Flood Risk Assessment [online] available to access via <<http://www.chichester.gov.uk/studies#flood>> last accessed [08/05/17]

Policy 42 Flood Risk and Water Management, of the Adopted Chichester Local Plan: Key Policies 2014-2019 states that:

'Flood and erosion risk will be taken into account at all stages in the planning process to avoid inappropriate development in areas at current or future risk, and to direct development away from areas of highest risk.'

The policy also discusses the future risks of flooding with regard to climate change, with the importance of avoiding inappropriate development in areas which are likely to be at risk of flooding as a result of climate change.

Chichester District Council's Surface Water & Foul Drainage Supplementary Planning Document (SPD) was adopted in September 2016. It seeks to guide developers, consultants and decisions makers and help them ensure that the necessary surface water and foul drainage infrastructure can be provided to accompany new development in the district. The SPD is a material consideration for CDC when assessing planning applications or appeals for any net new dwelling(s) and will be reviewed and updated periodically as necessary.

Summary of current baseline

Contribution to Climate Change

In relation to GhG emissions, source data from the Department of Energy and Climate Change suggests that Chichester District has had consistently higher per capita emissions total than that of both the South East of England and England as a whole since 2005 (see Table 4.1). Chichester District has seen a 13.8% reduction in the percentage of total emissions per capita between 2005 and 2012, lower than the reductions for the South East (15.9%) and England (16.7%).

Potential effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team²⁹. UKCP09 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the South East of England by 2050 for a medium emissions scenario³⁰ are likely to be as follows:

- The central estimate of increase in winter mean temperature is 2.2°C and an increase in summer mean temperature of 2.8°C; and
- The central estimate of change in winter mean precipitation is 16% and summer mean precipitation is -19%.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area. These include:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;

²⁹ The data was released on 18th June 2009: See: <<http://ukclimateprojections.metoffice.gov.uk/>> last accessed [04/02/17]

³⁰ UK Climate Projections (2009) South East 2050s Medium Emissions Scenario [online] available at: <<http://ukclimateprojections.metoffice.gov.uk/23907?emission=medium>> last accessed [28/03/17]

- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Flood Risk

Figure 4.1 displays the fluvial flood risk areas in the Neighbourhood Plan area. In this context there are several areas which are in Flood Zone 3. These areas include those surrounding The Lake, with some properties to the south lying within the high risk flood zone. The area to the north-east of Ifold also has areas which lie within Flood Zone 3, particularly surrounding the Wey and Arun Canal. Some roads in the parish, including Plaistow Road, are also located within Flood Zone 3 with a high risk of flooding.

The main areas which are in Flood Zone 3 are those surrounding waterbodies, such as Loxwoodhills Pond, Ifold, the Wey and Arun Canal, along with several unnamed watercourses. These areas of Flood Zone 3 cover several roads, including include Foxbridge Lane, Loxwood Road, large areas of Plaistow road and Shillinglee Road.

Summary of future baseline

Climate change has the potential to increase the occurrence of extreme weather events in the PIPNP area. This is likely to increase risks associated with climate change (including fluvial, coastal and drainage related flooding) with an increased need for resilience and adaptation. Additional future development has the potential to exacerbate flood risks.

A Critical Drainage Area (CDA) is a discrete geographic area where multiple and interlinked sources of flood risk causes flooding in one or more Local Flood Risk Zones (LFRZ) during severe weather, impacting people, property and/or local infrastructure. Chichester District Council may wish to designate their own CDAs (in the absence of any designations from the Environment Agency)³¹ within the Neighbourhood Plan area within the future, for reasons such as surface water capacity issues.

In terms of climate change mitigation, GhG emissions generated in the Neighbourhood Plan area may decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, an increase in the built footprint of the PIPNP area has the potential to contribute to increases in absolute levels of GhG emissions.

A.4 Landscape and Historic Environment

Context Review

The National Planning Practice Guidance's advice states that Neighbourhood Plans should include enough information, where relevant, *"about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale"* and *"about local non-designated heritage assets including sites of archaeological interest to guide decisions"*. Paragraph 115 of the NPPF states that a *"great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest*

³¹ GOV.UK (2017): 'Flood Risk Assessment in Flood Zone 1 and Critical Drainage Areas', [online] available to view via: <https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas> last accessed [06/04/17]

status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads." Additional key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.
- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- Develop 'robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics'.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt 'proactive strategies' to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Government's Statement on the Historic Environment for England³² sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

Policy 47: Heritage and Design of the Adopted Chichester Local Plan: Key Policies 2014-2019 states that planning permission for new developments will be granted where it can be demonstrated that the following criteria have been met, with supporting guidance followed;

- The proposal conserves and enhances the special interest and settings of designated and non-designated heritage assets including:
 - Monuments, sites and areas of archaeological potential or importance;
 - Listed buildings including buildings or structures forming part of the curtilage of the listed building; - Buildings of local importance, including locally listed and positive buildings;
 - Historic buildings or structures/features of local distinctiveness and character;
 - Conservation Areas; and
 - Historic Parks or Gardens, both registered or of local importance and historic landscapes.
- Development respects distinctive local character and sensitively contributes to creating places of a high architectural and built quality;
- Development respects existing designed or natural landscapes; and
- The individual identity of settlements is maintained, and the integrity of predominantly open and undeveloped character of the area, including the openness of the views in and around the South Downs National Park is not undermined.

The South Downs National Park Authority has produced the Partnership Management Plan (PMP), Shaping the Future of your South Downs National Park 2014– 2019³³. The PMP provides a framework

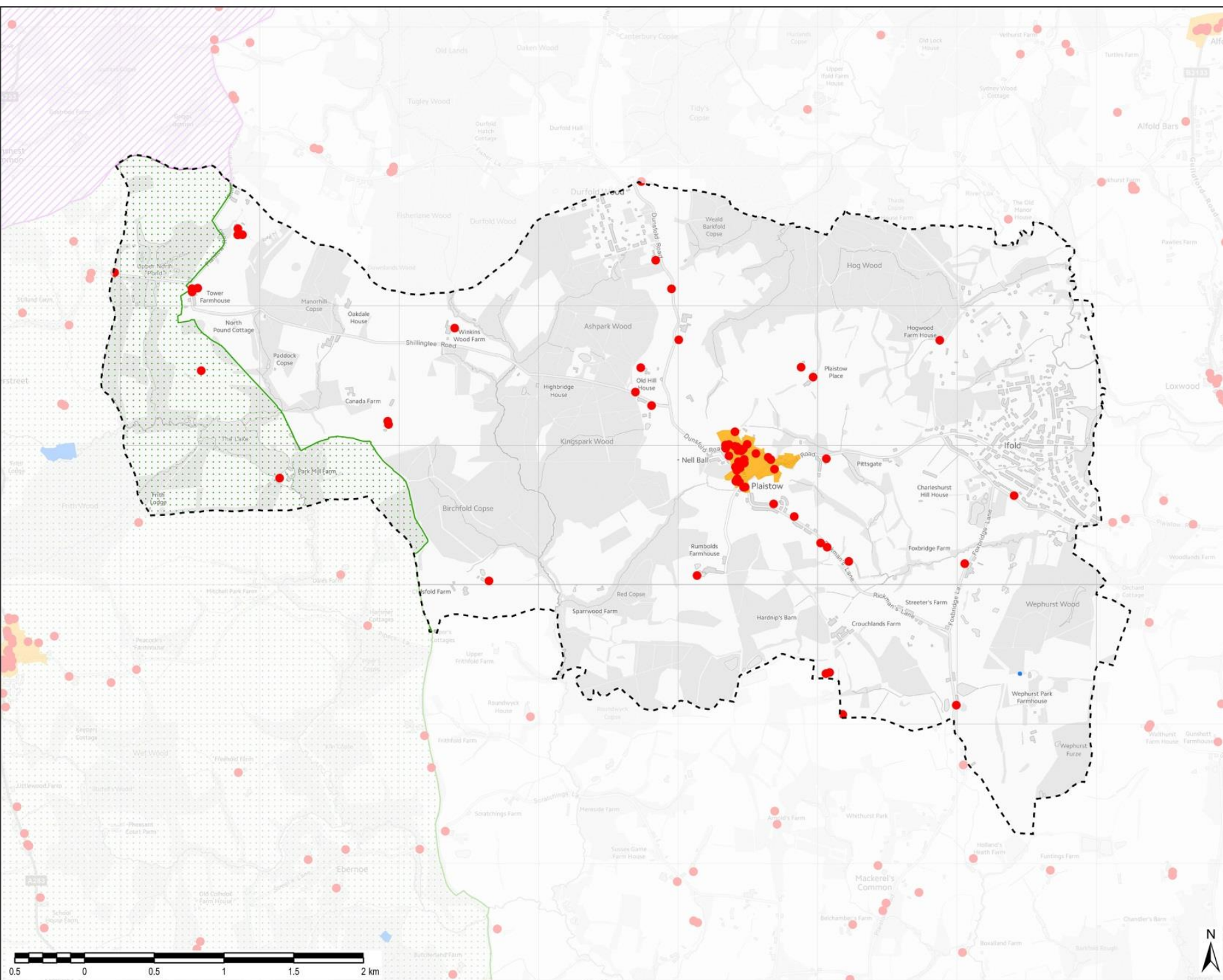
³² HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: <http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx> last accessed [30/03/17]

³³ South Downs National Park Authority (2017) Partnership Management Plan, Shaping the future of your South Downs National Park 2014 -2019. [online] available at: <<https://www.southdowns.gov.uk/national-park-authority/our-work/key-documents/partnership-management-plan/>> last accessed [09/05/17]

for the emerging National Park-wide local plan which is estimated for submission and adoption in 2018. The PMP will consider impacts on the National Park's special qualities from outside its boundary as well as from inside. This could be through water flows or use, species migration, traffic, economic activity or views to and from the area. The key aims/outcomes of the National Park PMP are as follows;

- A thriving living landscape „
 - Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change. „
 - Outcome 2: There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures. „
 - Outcome 3: A well-managed and better connected network of habitats and increased population and distribution of priority species now exist in the National Park. „
 - Outcome 4: The condition and status of cultural heritage assets and their settings is significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and sense of place.
- People connected with places
 - Outcome 5: Outstanding visitor experiences are underpinned by a high quality access and sustainable transport network providing benefits such as improved health and wellbeing.
 - Outcome 6: There is widespread understanding of the special qualities of the National Park and the benefits it provides.
 - Outcome 7: The range and diversity of traditional culture and skills has been protected and there is an increase in contemporary arts and crafts that are inspired by the special qualities of the National Park.
 - Outcome 8: More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.
- Towards a sustainable future
 - Outcome 9: Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.
 - Outcome 10: A diverse and sustainable economy has developed which provides a range of business and employment opportunities, many of which are positively linked with the special qualities of the National Park.
 - Outcome 11: Local people have access to skilled employment and training opportunities.

File Name: I:\5014 - Information Systems\60538603_Neighbourhood_Plan_Lo6_Ve02_Maps\PlaiStow and Ifold Parish NP Steering Group\Figures 5-1 - Historic Environment and Landscape Designations.mxd



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LEGEND

- PlaiStow and Ifold Neighbourhood Plan Area
- Listed building
- Record of Scheduled Monument
- Conservation Area
- Surrey Hills Area of Outstanding Natural Beauty
- South Downs National Park

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Purpose of Issue: **DRAFT**

Client: **PLAISTOW AND IFOLD PARISH NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title: **PLAISTOW AND IFOLD PARISH NEIGHBOURHOOD PLAN**

Drawing Title: **HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS**

Drawn CN	Checked JW	Approved NCB	Date 15/05/2017
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Summary of current baseline

Landscape

The western part of the Neighbourhood Plan area including The Lake lies within the South Downs National Park. The South Downs National Park was designated in 2010 and covers an area of 1,600km². The following seven Special Qualities were agreed by the South Downs National Park Authority in 2011:

- Diverse, inspirational landscapes and breath-taking views;
- A rich variety of wildlife and habitats including rare and internationally important species;
- Tranquil and unspoilt places;
- An environment shaped by centuries of farming and embracing new enterprise;
- Great opportunities for recreational activities and learning experiences;
- Well-conserved historical features and a rich cultural heritage;
- Distinctive towns and villages, and communities with real pride in their area.

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The Neighbourhood Plan area is located within NCA 121: Low Weald. The Low Weald NCA is a broad, low lying clay valley, which is predominantly agricultural, supporting in the majority pastoral farming due to the heavy clay soils. The NCA also supports many densely wooded areas with a high proportion of ancient woodland; it is also rated among the most important for richness of bat species, bullfinch and woodpecker as well as rare plants and lichens.

A Landscape Character Assessment was undertaken for West Sussex, with 42 unique areas identified. The PIPNP lies within LW2 North Western Low Weald³⁴. The area is characterised as;

'A scenic, undulating pastoral landscape of mixed geology, extending from the Arun Valley in the east and Petworth and Northchapel in the west and represents the western extent of the Low Weald. It comprises a gentle, rolling, enclosed rural landscape, with a sense of unity conferred by strong patterns of woodland, streams and rolling pasture interspersed with more open arable fields. Natural colours and textures of mature semi-natural woodland and pasture predominate. Many pastures contain field oak trees and are enclosed by sometimes dense networks of hedgerows, hedgerow trees, shaws, and frequent small and medium sized woodlands. Overall, the area has a remote and tranquil character.'

In the Chichester District Landscape Capacity Study Extension for Chichester District Council, Plaistow and Ifold are within Zone 17³⁵. The Landscape Capacity Study states;

'The village of Plaistow is located in Zone 17 on relatively high ground within the locality. The land to the south and east falls towards watercourses. The settlement is surrounded by pastoral fields contained by woodland to the north, west and south. A minor valley feature and watercourse runs through the area to the east of the settlement. The landscape then rises to form minor ridges to the east of the valley.'

³⁴West Sussex County Council (No Date) Landscape Character Assessment of West Sussex. [online] available at <<https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/>> last accessed [09/05/17]

³⁵ Chichester District Council (2011) Chichester District Landscape Capacity Study Extension. [online] available to access via: <<http://www.chichester.gov.uk/CHttpHandler.ashx?id=15651>> last accessed [09/05/17]

On lower ground, Ifold (Zone 17) is separated from Plaistow to the west by the minor ridges along the settlements western edge. Ifold is on gently sloping land which falls towards the Wey and Arun Canal to the east, which in turns leads to the wider Arun Valley to the east.'

Historic Environment

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains no Grade I listed buildings, however there are 72 Grade II and one Grade II* listed buildings within the Neighbourhood Plan area.

The Grade II* listed building within the Neighbourhood Plan area is 'Shillinglee Court Shillinglee House'. Listed in November 1998, the north wing of the building (now Shillinglee Court) was built in 1735 for Edward Turnour, with the south wing (now numbers 1, 2, and 3 Shillinglee House) was added in the 1780s for Edward Turnour Garth, the 1st Earl of Winterton³⁶. The 2016 draft of the Village Design Statement for the Plaistow and IFOLD Parish states the following:

"Shillinglee was originally a Manor of the Arundel Estates, belonging to the Duke of Norfolk's family. They used this and the surrounding areas of the ancient Chiddingfold Forest as a hunting lodge. Until the mid-1970's, the Shillinglee Estate was owned for 300 years by the Turnour family. In the mid-1970's the majority of the estate, which consisted of several dairy farms and both Kingspark and Ashpark forestry, was sold off. The main house now consists of three apartments".

The Parish has not undertaken a survey of Grade II listed buildings in the part of the Plan area outside of the South Downs National Park. The Parish Council is not aware of any Grade II listed buildings as being under threat. All Grade II listed buildings are occupied and well-maintained, but it has been noted that Crouchland Farm House (Grade II) is next to the unapproved Crouchland Biogas Limited industrial biogas plant. There are three Grade II listed buildings within the National Park boundary. The South Downs National Park Buildings at Risk Survey (2012/13)³⁷ stated that only 1.52% of Grade II buildings were at risk, with 4.69% recorded as being in a vulnerable condition. The survey does not list the condition of individual buildings.

There is one scheduled monument within the Neighbourhood Plan area, the Site of the Wephurst Glass House, which is located on Wisborough Green Road in Plaistow. The monument was scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance.

There are no nationally registered battlefields or registered historic parks and gardens within the Neighbourhood Plan area.

Conservation areas are designated because of their special architectural and historic interest³⁸. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England³⁹. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area, and can be developed into a management plan. The Plaistow Conservation area covers much of the east of Plaistow village.

³⁶ Historic England (2017): 'Shillinglee Court Shillinglee House', [online] available to access via: <<https://historicengland.org.uk/listing/the-list/list-entry/1226667>> last accessed [17/08/17]

³⁷ South Downs National Park Authority (2012): 'Buildings at Risk Survey', [online] available to access via: <https://www.southdowns.gov.uk/wp-content/uploads/2015/09/SDNP_BAR_2012-Report.pdf> last accessed [17/08/17]

³⁸ Historic England (2017): 'Conservation Areas', [online] available to access via: <<https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>> last accessed [27/03/17]

³⁹ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to download from: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [27/03/17]

A Character Appraisal and Management Proposal⁴⁰ was created in 2013 for the Plaistow Conservation Area (which was also extended in 2013). The Character Appraisal summarised a number of significant features of the Plaistow Conservation Area, which include;

- Small tranquil village located in countryside with an attractive setting of undulating woodland and fields;
- Triangular street layout encompasses areas of open green space used as a village common and a children's playground;
- The village pond forms a focal point in the middle of the village;
- Informal low density layout of houses and small cottages, many with visible gardens;
- Areas of woodland within the village reinforce its rural character;
- The junction of Loxwood Road, The Street, Dunsfold Road and the private lane which leads northwards towards Plaistow Place is the centre of the village;
- The three most important buildings in Plaistow, Holy Trinity Church, The Sun Public House, and the village Primary School, are all located close to this junction;
- Holy Trinity Church is unlisted and dates to the 1860s - it is notable for its sandstone elevations, clock tower, and tall lancet windows; and
- The Primary School was built in 1869 and retains a well detailed front elevation to Loxwood Road, although there have been sizeable additions to the rear.

The only loss of character we are aware of within the Conservation Area is the introduction of concrete kerbing around the recreation ground and The Green. Outside of the Conservation Area, it is noted that the loss of trees in Ancient Woodland (Hardnip's Copse) next to the Crouchland Biogas Limited industrial biogas plant and the removal of ancient hedgerow at Crouchland Farm.

The Management Proposals identified measures to maximise the positive features and minimise negative features within the conservation area, such as poorly detailed modern extensions, speeding traffic, issues with the conservation area boundary, and visible overhead cables. This will be done through a review of the boundary, with the view to extend the boundary to cover a range of extra buildings. Methods of improving pedestrian safety and reducing traffic speeds in Plaistow will be sought, whilst keeping the special character of the conservation area. Another recommended action is that the Chichester District Council will ensure that all new development within or bordering the conservation area is carefully designed so sympathetic to its surroundings.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. The 2016 Heritage at Risk Register for South East England⁴¹ only highlights Grade I and Grade II* listed buildings which are at risk outside of London, unless they are Grade II listed places of worship. This means that no information is available regarding the level of risk facing the majority of listed buildings in the Neighbourhood Plan area. The scheduled monument in the Neighbourhood Plan area is not listed and therefore not been evaluated.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities. For example, open spaces and

⁴⁰ Chichester District Council (2013) Plaistow Conservation Area Character Appraisal and Management Proposals [online] available to access via <<http://www.chichester.gov.uk/CHttpHandler.ashx?id=16939&p=0>> last accessed [09/05/17]

⁴¹ Historic England (2016): 'Heritage at Risk 2016 Register – South East', [online] available to download via: <<https://www.historicengland.org.uk/images-books/publications/har-2016-registers/>> last accessed [15/05/17]

key distinctive buildings in the area are likely to be of value for local people. Alongside, there are buildings of historic and local importance in Ifold that are not listed; some of these date from the 1800s, including Butlers formerly Alpine Cottage, Hogwood House, Ifold Cottage, Keepers Cottage, Trelayne and The Lodge, all of which are listed in Appendix 2 'Historic Buildings of Positive Merit' within the August 2017 draft Neighbourhood Plan

The Chichester District Historic Environment Record (HER) is a publicly available resource used for the purposes of planning, conservation, research, education and general interest. The HER database provides an index of archaeological sites, monuments, landscapes, listed buildings and other information regarding the historic environment. 24 records within the parish are on the West Sussex HER database, incorporating a wide range of features, including the Wey and Arun Canal, parks, glass furnaces, quarries, brickworks, lime kilns and others.

Figure 5.1 shows the designated landscapes and historic sites located within the Neighbourhood Plan area.

Summary of future baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of cultural heritage assets; for example through inappropriate design and layout. It should be noted, however, that existing historic environment designations and, in the west of the parish the South Downs National Park offer a degree of protection to cultural heritage assets and their settings. Additionally the Character Appraisal and Management Plan for the Plaistow Conservation Area offers additional protection in terms of outlining suggested priorities for management and decision making for areas within these two conservation areas.

New development has the potential to lead to small, but incremental changes in landscape and villagescape character and quality in and around the Neighbourhood Plan area; for instance through the loss of landscape features and visible impact. However, new development need not be harmful to the significance of a heritage asset, and in the context of the PIPNP area there is opportunity for new development to enhance the historic setting of the key features and areas and better reveal assets' cultural heritage significance.

A.5 Land, Soil and Water Resources

Context Review

The EU's Soil Thematic Strategy⁴² presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

⁴² European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> last accessed [15/05/17]

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England⁴³, which sets out a vision for soil use in England, and the Water White Paper⁴⁴, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England⁴⁵ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

In February 2011, the Government signalled its belief that more locally focussed decision making and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive. Chichester District Council lies within the South East River Basin Management Plan area⁴⁶. This area is subdivided into catchments, with the Arun and Western Streams catchment covering the Chichester District. A Catchment Partnership has been established for each of these to direct and coordinate relevant activities and projects within the catchment through the production of a Catchment Management Plan⁴⁷. The Catchment Partnerships are supported by a broad range of organisations and individuals representing a whole host of interests.

Policy 53 District Canals of the Adopted Chichester Local Plan: Key Policies 2014-2019 states;

'Appropriate development that assists the provision of through navigation or enhancement of the Chichester Ship Canal and the Wey and Arun Canal will be supported where it meets environmental, ecological and transport considerations.'

Summary of current baseline

Land Quality

The Neighbourhood Plan area does not have a history of heavy industrial land use. However several significant and one major industrial pollution incidents have been recorded by the Environment Agency

⁴³ Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from:

<<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [30/01/17]

⁴⁴ Defra (2011) Water for life (The Water White Paper) [online] available at <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [30/01/17]

⁴⁵ Defra (2011) Government Review of Waste Policy in England [online] available at:

<<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed [30/01/17]

⁴⁶ GOV.UK (2009): South East River Basin District River Basin Management Plan: 2009', [online] available to download via: <<https://www.gov.uk/government/publications/south-east-river-basin-management-plan>> last accessed [17/08/17]

⁴⁷ Arun and Western Streams Catchment Partnership (no date): Catchment Management Plan', [online] available to view via: <<http://www.arunwesternstreams.org.uk/>> last accessed [17/08/17]

under the EC Integrated Pollution Prevention and Control Directive (IPCC)⁴⁸. These incidents all occurred from the industrial biogas plant located at Crouchland Farm, in the south of the Neighbourhood Plan area. The major pollution event occurred in 2016 and was concerned with specific waste materials polluting water. This event was categorised as major due to the potential for persistent and extensive effects on the quality of the environment, there may be major damage to the ecosystem, agriculture and/or commerce, and it may have a serious impact upon man.

Quality of Agricultural Land

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality.

In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken within the Neighbourhood Plan area. Based on the 1:250,000 series of ALC maps produced by Natural England⁴⁹ and utilised for strategic purposes, the land in the Neighbourhood Plan area is non-agricultural or Grade 3 good to moderate. However there is no detailed information available as to whether the Grade 3 areas are 3a or 3b.

Watercourses

The largest watercourse within the Neighbourhood Plan area is the Wey and Arun Canal, which is located in the northeast of the parish, adjacent to Ifold. There a range of lakes and ponds within the Neighbourhood Plan area. These include Loxwoodhills Pond and the Upper and Lower North Ponds. The Neighbourhood Plan area contains a large network of small streams, which are visible in Figures 4.1 and 4.2.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. There are no SPZs covering the Neighbourhood Plan area.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs), and as such, they are recognised as being at risk from agricultural nitrate pollution. Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. NVZs for 2017-2020 started on January 1st 2017⁵⁰, including new areas of NVZs and excluding areas that have been de-designated. The Neighbourhood plan area lies within NVZ 523 for surface water, as well as proposed 2017 NVZ area S532 (also for surface water).

Summary of future baseline

Due to increasing legislative and regulatory requirements, there are increasing pressures to improve recycling and composting rates.

In terms of water quality, the requirements of the Water Framework Directive (and its replacement) are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality has the potential to be affected by pollution incidents in the area, the presence of non-native species and future physical modifications to waterbodies.

⁴⁸ Environment Agency Interactive Map: 'Pollution Incidents' [online] accessible via: <<http://apps.environment-agency.gov.uk/wiby/default.aspx>> last accessed [20/03/17]

⁴⁹ Natural England (2011): 'Agricultural Land Classification map London and the South East (ALC007)', [online] available to download via: <<http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>> last accessed [30/03/17]

⁵⁰ GOV.UK (2017): 'Nutrient Management: Nitrate Vulnerable Zones' [online] available to access via: <<https://www.gov.uk/guidance/nutrient-management-nitrate-vulnerable-zones>> last accessed [17/03/17]

A.6 Population and Community

Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change⁵¹ warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

There are a range of policies within the Adopted Chichester Local Plan: Key Policies 2014-2019 relating to the Population and Community SA theme, including as follows;

⁵¹ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [03/02/17]

- Policy 3: The Economy and Employment Provision;
- Policy 4: Housing Provision;
- Policy 33: New Residential Development;
- Policy 34: Affordable Housing;
- Policy 38: Local and Community Facilities;
- Policy 52: Green Infrastructure; and
- Policy 54: Open Space, Sport and Recreation.

Summary of current baseline

Population

According to the most recent census data available, the population in 2011 in Plaistow and Ifold Parish was 1,898, which was an increase of 2.3% from 2001. In comparison the population of Chichester District has seen an increase of 6.5% in the same time period. The population increase in the PIPNP area was significantly lower than the 7.9% increase seen in the South East and England.

Age Structure

Within the Neighbourhood Plan area, 30.7% of residents are aged 60+. This is similar to the average in Chichester District (31.9%), but is higher than the national average of 22.3%. The level of the population within the 24-44 age range is significantly lower than the regional average of 26.5% and the national average of 27.5%. The proportion of residents within the 16-24 age range in the parish (6.6%) is significantly lower than locally (10.0%), regionally (11.2%) and nationally (11.9%).

Household Deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Based on the most recently available census data, 40.2% of households within the Parish are deprived in some way. This is significantly lower than the average for Chichester District (51.4%), the South East (52.3%) and England (57.5%). The households deprived in 1, 2, 3, and 4 dimensions are also lower in each category than the district, South East and England equivalents.

Index of Multiple Deprivation

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).

- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 1. 'Geographical Barriers': relating to the physical proximity of local services
 2. 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 3. 'Indoors Living Environment' measures the quality of housing.
 4. 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales (see **Table 7.4**).

There are two LSOAs that are either fully or partially in the Neighbourhood Plan area: Analysis of the data presented in Table 7.4 below reveals the following inferences:

General Trends

LSOA E01031502 Chichester 001A: Covers a small portion of the Neighbourhood Plan area, including several residential properties in the village of Ifold. In this area there are very low levels of deprivation with a very low risk of crime, and high levels of education skills and training, there are also high incomes in the area along with high levels of employment. However there are significant barriers to housing and services, particularly with regard to geography and the lack of services in the immediate area.

LSOA E01031503 Chichester 001B: Covers the vast majority of the Neighbourhood Plan area except for a small area to the east of Ifold. In this LSOA there are very low levels of deprivation, with high levels of income and employment, as well as low levels of children living in income deprived families. There are also high levels of deprivation where access to services is considered.

Similarities between the LSOAs

Both LSOAs performed well, in Chichester 001A 14 of the 16 factors considered were in the top 30% least deprived deciles, with the other two- barriers to housing and services, and the geographical barriers sub-domain performing poorly, both within the top 20% most deprived. With Chichester 001B, 13 of the 16 factors performed in the top 30% least deprived deciles.

Contrasts between the LSOAs

The two LSOAs were very similar across all factors, except for the Indoors sub-domain, where the housing was of poorer quality in Chichester 001B when compared with Chichester 001A. Whilst poorer than Chichester 001A, the quality of housing in Chichester 001B was still within the top 50% least deprived deciles.

Housing Tenure

The majority of houses in the Neighbourhood Plan area (88.6%) own their own home outright or with a mortgage (Figure 7.1), this is significantly higher than the averages for Chichester District (67.1%), the South East (67.6%) and England (63.3%). The levels of social and private rented properties in Plaistow and Ifold (4.9% and 4.4% respectively) are much lower than the averages for Chichester District (14.9% for both social rented and private rented) as well as regionally and nationally.

Education

With regards to the most recently available census data (Figure 7.2), 11.9% of residents within the Neighbourhood Plan area have no qualifications, a percentage which is significantly lower than the averages for Chichester District (19.5%), the South East (19.1%) and England (22.5%). This is reflected in the data for those residents within the Neighbourhood Plan area with level 4 qualifications (41.2%), when compared with Chichester District (32.4%), the South East (30.0%) and the national average (27.4%).

Employment

In the Neighbourhood Plan area there is a significantly higher proportion of residents (aged 16 to 74) employed as managers, directors and senior officials (21.1%) when compared with the local, regional and national averages (14.2%, 12.3% and 10.9% respectively), this may be a reflection of the educational trends previously discussed. There are far fewer residents employed as process plant/machine operatives, in sales and customer service occupations and in caring, leisure and other services, when compared to Chichester District, South East and national averages.

Summary of future baseline

The population of the Neighbourhood Plan area is likely to age. This has the potential to have implications for the delivering of community facilities, including health services.

Levels of deprivation in the Neighbourhood Plan area are likely to remain low, with only geographical barriers preventing access to services being a concern. The suitability of housing for local requirements depends in part on the successful implementation of policies outlined in the Adopted Chichester Local Plan: Key Policies 2014-2019 and the PIPNP.

A.7 Health and Wellbeing

Context Review

Key messages from the NPPF include:

- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities'
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

- Set out the strategic policies to deliver the provision of health facilities.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives⁵² ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The West Sussex Joint Strategic Needs Assessment (2014)⁵³ was written to describe the current and future health, social care and wellbeing needs of the local population. The overarching themes of the JSNA are listed below;

- The importance of starting well;
- Prevention and resilience in relation to individuals, families and communities; and
- Co-morbidity/clustering of conditions and behaviours.

The West Sussex JSNA is currently under review, with updates to be made in the near future.

Health and Well-being is one of the key visions of the Adopted Chichester Local Strategy, with the following objectives;

- Encourage healthy and active lifestyles for all;
- A culturally enriched and empowered community;
- The needs of an older population;
- Accessible health and wellbeing services; and
- Health Protection.

Summary of current baseline

Health Indicators and Deprivation

As shown in Figure 8.1 there are high levels of 'very good health' within the PIPNP area, 54.6%, compared with 47.6% in Chichester, 49.0% in the South East and 47.2% average for England. Fewer residents in the PIPNP reported having 'bad health' or 'very bad health' - 2.6% compared with 4.3% in Chichester District, 4.4% in the South East and 5.4% average nationally. The lower than average levels of 'bad health' and 'very bad health', align with the disability data presented in Table 8.1, with fewer residents in the PIPNP area reporting themselves to be limited by disability when compared with the local, regional and national averages.

⁵² The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <http://www.apho.org.uk/resource/item.aspx?RID=106106> last accessed [27/01/17]

⁵³ West Sussex County Council (2014) Joint Strategic Needs Assessment [online] available to access via: <http://jsna.westsussex.gov.uk/reports/joint-strategic-needs-assessment-report/> last accessed [11/05/17]

Summary of future baseline

The health and well-being levels within the Neighbourhood Plan area are good, with higher numbers of residents having 'very good health' when compared with other local, regional and national averages. A growing population within the Neighbourhood Plan area might face future pressures on health services in the area.

Ongoing cuts to community services have the potential to lead to effects on health and wellbeing over the long term.

Obesity is seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

A.8 Transportation

Context Review

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008.

The main objective of the West Sussex Transport Plan 2011-2026⁵⁴ is to improve the quality of life for the people of West Sussex by helping to provide:

- A high quality transport network that promotes a competitive and prosperous economy in all parts of the County
- A resilient transport network that complements the built and natural environment whilst reducing carbon emissions over time
- Access to services, employment and housing
- A transport network that feels, and is, safer and healthier to use.

Policy 39; Transport, Accessibility and Parking of the Adopted Chichester Local Plan: Key Policies 2014-2019 lists a range of conditions that development must meet to be granted planning permission. These are as follows;

- All development provides for the access and transport demands they create, through provision of necessary improvements to transport networks, services and facilities, either directly by the developer or indirectly in the form of financial contributions;
- Development is located and designed to minimise additional traffic generation and movement, and should not create or add to problems of safety, congestion, air pollution, or other damage to the environment;
- The proposal has safe and adequate means of access and internal circulation/turning arrangements for all modes of transport relevant to the proposal;

⁵⁴ West Sussex County Council (2011) West Sussex Transport Plan 2011-2016 [online] available via: https://www.westsussex.gov.uk/media/3042/west_sussex_transport_plan_2011-2026_low_res.pdf last accessed [11/05/17]

- The proposal encourages development that can be accessed by sustainable modes of transport, in part, through the creation of links between new development and existing pedestrian, cycle and public transport networks;
- The proposal provides for safe, easy and direct movement for those with mobility difficulties;
- The proposal does not create residual cumulative impacts which are severe; and
- Proposals provide for high quality linkage direct from the development to the broadband network.

Summary of current baseline

Rail Network

There are no railway stations within the Neighbourhood Plan area. The nearest stations are at Haslemere and Billingshurst.

Haslemere railway station is 6km to the west of Neighbourhood Plan area; however it is 11 km from Plaistow village and 12.5km from Ifold settlement. Billingshurst station is approximately 7km south of the Neighbourhood Plan area, but is 8.5km from Ifold and 10km from Plaistow.

Haslemere railway station is located on the London to Portsmouth railway line, with four trains per hour to London Waterloo, two of which are fast services. Stations preceding from the London direction are Godalming, Witley and Guildford, and following stations in the Portsmouth direction are Liphook and Petersfield.

Billingshurst railway station is operated by Southern and lies on the Arun Valley Line. There are generally two trains per hour to London Victoria and two trains per hour to Bognor Regis. Preceding stations are Horsham and Christs Hospital, and the following station is Pulborough.

Bus Network

Bus services in the Neighbourhood Plan area are run by Compass Travel. Bus 66 travels from Loxwood to Horsham, stopping at Plaistow, Wisborough Green and Billingshurst. The bus runs one route on Mondays and Thursdays only. Bus 69 runs one journey every Tuesday and Thursday from Alfold to Worthing, stopping at Loxwood, Wisborough Green Billingshurst and Pulborough. Both routes stop at Ifold Stores and Plaistow Church.

However, this service is not scheduled, and is dependent on demand. As such there are a number of taxi services which provide 'on-demand' services in the Neighbourhood Plan area.

Road Network and Congestion

The road network comprises a network of minor roads and country lanes, sometimes with narrow passing places. There are no A or B roads within the Neighbourhood Plan area.

Cycle and Footpath Network

Many roads within the Neighbourhood Plan area are narrow country lanes; these often do not have pavements and can be unsuitable for pedestrian use.

There are a range of footpaths in the area, with the Sussex Border Path running along the northern boundary of the PIPNP area. There are also footpaths joining Plaistow with Ifold, as well as paths leading south to Kirdford and routes west into the South Downs National Park.

Availability of Cars and Vans

With regard to access to vehicles within the Neighbourhood Plan area the proportion of households with no access to a car (3.5%) is significantly lower than the average for Chichester District (15.6%), the South East (18.6%) and England (25.8%). A significantly higher number of households have access to two or more cars (73.4%) when compared with Chichester District (42.3%), the South East (39.7%) and

England (32.1%). The high level of cars in the PIPNP per household is likely to be due to the rural nature of the area and poor public transport links.

Travel to Work

Based on the most recent census data, the most popular method of traveling to work in the PIPNP is via driving a car or van (42.8%), higher than the averages for Chichester District (39.7%) and the average for England (36.9%). After driving, the most second most popular method of travelling to work in the PIPNP area is to work from home, with the value of 10.7%, higher than the averages for Chichester District (6.2%), the South East (4.5%) and the national average of 6.9%. Only 0.3% of residents within the Neighbourhood Plan area travel to work via bus or coach.

Summary of future baseline

New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, particularly considering the narrow lanes which run through the area.

Public transport use has the potential to remain low compared with private car use; this likely to be due to the infrequent nature of the services provided within the area. There is potential to increase sustainable transport use and active travel such as cycling.

There is the potential for the number of people working from home in Plaistow and Ifold to significantly increase due to modern working patterns such as agile and flexible working.

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