

**Cowfold Neighbourhood Plan  
Regulation 14 Pre-submission  
Sustainability Appraisal (incorporating  
Strategic Environmental Assessment)**



**August 2019**

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## **Appendices**

Appendix 1 - Cowfold Neighbourhood Plan Housing Site Appraisal

Appendix 2 - Cowfold Neighbourhood Plan Policy & Aims Appraisal

## 1. INTRODUCTION

- 1.1. This Sustainability Appraisal (SA) report is in respect of the Regulation 14 Pre-submission Cowfold Neighbourhood Plan (CNP).
- 1.2. The Parish lies to the south of Horsham, with the village of Cowfold at the intersection of the A272 and the A281. It is predominantly rural in character.
- 1.3. The historic market town of Horsham lies 6.6 miles to the north. Gatwick airport lies 16 miles to the north east.
- 1.4. The Parish is bounded by the adjoining parishes of Nuthurst to the north west, Lower Beeding to the north, Shermanbury to the south, and West Grinstead to the west. It is also bound by Bolney parish to the east which lies within the Mid Sussex District.
- 1.5. The National Planning Policy Framework (NPPF) confirms:

*“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”<sup>1</sup>*
- 1.6. The CNP as been driven and prepared by Cowfold Parish Council (CPC), with input from local residents, community groups and other stakeholders. During this process there has been extensive public consultation and feedback forums.
- 1.7. The CNP is important for the future of the Parish. If positively supported at Referendum, it will become a key material consideration in guiding development in the Parish and determining planning applications up to 2031.
- 1.8. Neighbourhood Plans must be in general conformity with the adopted Development Plan Document (DPD) of the District. The Horsham District Planning Framework (HDPF) is the overarching planning document for Horsham district outside the South Downs National Park (SDNP).
- 1.9. The obligation to undertake a SA is set out in Section 39 of the Planning and Compulsory Purchase Act 2004. This requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. The process involves examining the likely effects of the Plan and considering how they contribute to social, environmental and economic well-being.
- 1.10. A Strategic Environmental Assessment (SEA) involves the evaluation of the environmental impacts of the plan or programme. The requirement for SEA is set out in the European Directive 2001/42/EC adopted in UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004.”

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<sup>1</sup> Paragraph 29, National Planning Policy Framework

- 1.11. The SEA process is very similar to the SA process, with more prescriptive guidance that needs to be followed in order to meet the SEA Directive’s requirements. Government guidance (in a Practical Guide to the Strategic Environmental Assessment Directive (ODPM 2005)) suggests incorporating the SEA process into the SA and consider economic and social effects alongside the environmental effects considered through the SEA. This approach has been followed. For simplification, this report is referred to as a SA, although it incorporates the SEA.
- 1.12. The purpose of this SA is to assess whether the CNP may have effects on a range of sustainability topics and consider alternatives and mitigation to reduce any negative impact. The SA has been carried out by independent consultants.
- 1.13. Much of the data used in the preparation of the SA comprises ‘baseline information’ which is contained and presented in a Scoping Report prepared in the early stages of this SA process. The Scoping Report collated baseline data on broad areas of economic, social and environmental issues. It analysed a range of environmental protection objectives established at International, European, national or local level which were relevant to the CNP. It considered the implications of other plans and documents and set out a series of Sustainability Objectives. The Scoping Report also set out the proposed methodology for undertaking the SA.
- 1.14. The Scoping Report and baseline data was the subject of public consultation with statutory bodies (Historic England, Natural England, the Environment Agency) in March 2018.
- 1.15. The document has been continually updated to ensure that any new plans or documents released whilst the SNP has been prepared, have been assessed.
- 1.16. This SA is structured as follows:

<b>Section 2</b> - details the SA (inc SEA) appraisal methodology
<b>Section 3</b> - summarises the baseline collection work, identification of the plans, policies and programmes that have an impact on the HNP, with updates on these in light of feedback on the Scoping Report. It also includes a summary of the challenges for the future of the Parish
<b>Section 4</b> - sets out the objectives and indicators (collectively known as the Sustainability Framework), which will be used to appraise the various policy options. The HNP objectives are tested against the Sustainability Objectives for compatibility
<b>Section 5</b> - contains the individual policy appraisals, testing realistic options against the Sustainability Framework
<b>Section 6</b> - sets out the next steps

- 1.17. The SA process has established a range of sustainability issues and options to be considered in formulating the proposals for the CNP. It has ensured consideration of a range of potential social, economic and environmental effects. This has enabled the most sustainable policy options to be identified for inclusion with the consultation draft CNP.
- 1.18. The Regulation 14 Pre-submission CNP, along with this accompanying SA will is available for public consultation from 19th August 2019 until 14th October 2019.
- 1.19. Comments on the CNP and SA, to be received no later than 5pm on 14th October 2019.
- 1.20. Comments should be sent by email or hard copies deposited at the Cowfold Village Hall at the address below:

<b>Email:</b>	<a href="mailto:cnp@cowfold-pc.gov.uk">cnp@cowfold-pc.gov.uk</a>
<b>Paper Responses:</b>	<b>Cowfold Village Hall Bolney Road Cowfold West Sussex RH13 8AA</b>

## 2. APPRAISAL METHODOLOGY

2.1. This SA has been prepared in accordance with the following Government guidance:

- Sustainability Appraisal guidance within the CLG Plan Making Manual; and
- SEA guidance from the ODPM “A Practical Guide to the Strategic Environmental Assessment directive” 2005.

2.2. Based on this guidance, a five stage approach has been undertaken in preparing this SA:

Stages in the SA process	
Stages	Tasks
<b>Stage A</b> - Setting the context and objectives, establishing the baseline and deciding on the scope.	Identify other relevant plans and programmes. Collect Baseline Information. Identify Problems. Develop objectives and the Sustainability Framework. Consult on the scope of the SA.
<b>Stage B</b> - Developing and refining alternatives and assessing effects.	Test the Plan objectives against SA objectives. Develop alternative options. Assess the effects of policy options against the SA objectives. Consider mitigation. Propose measures to monitor the effects.
<b>Stage C</b> - Preparing the Sustainability Appraisal.	Present the predicted effects of the Plan, including alternatives.
<b>Stage D</b> - Consult on the draft CNP and SA.	Give the public and consultation bodies opportunity to comment on the SA . Assess significant changes to the CNP.
<b>Stage E</b> - Monitoring the significant effects of implementing the plan or programme on the environment.	To monitor the effectiveness of the CNP.

Figure 1: Stages in the SA process

- 2.3. Stage A and the associated tasks have been undertaken as part of the preparation of the Scoping Report. This was published for formal consultation in March 2018. The feedback from this consultation and the consequential changes to the baseline data and sustainability framework are detailed below.
- 2.4. Stage B is the main focus of this Report. It involves measuring the likely significant social, economic and environmental effects of the strategy and policies contained within the Regulation 14 Pre-submission CNP consultation.
- 2.5. Section 4 of this Report sets out the Sustainability Framework and tests the objectives of the CNP against this framework. Section 5 sets out the policy appraisal. This highlights the different advantages and disadvantages of each option, showing the preferred policy is the most sustainable option, given reasonable alternatives. The following symbols and colours are used to record this:

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

**Figure 2:** Symbols in SA

- 2.6. This scoring system is comparable with the SA undertaken by HDC in connection with their production of the HDPF. The appraisal tables provide a summary explanation of the predictions of the effect the policy options will have on the objectives.
- 2.7. The results of Stage B are comprised in this Report, which collectively comprises Stage C.
- 2.8. In accordance with Stage D, this Report is to be the subject of public consultation alongside the Regulation 14 Pre-submission CNP. Stage E will not take place until the CNP is adopted and the effects monitored, as detailed in Section 6 of this Report.



### 3. BASELINE INFORMATION

- 3.1. As part of Stage A of this SA process, a review of other plans, programmes, policies, strategies and initiatives that may influence the content of the CNP was undertaken, together with the collation of extensive baseline data for the Parish.
- 3.2. The Baseline Data (as outlined in the Scoping Report) is presented below. Where this data has been updated either due to the availability of more recent baseline data or in response to consultation advice received in response to consultation on the Scoping Report this is also set out below under each topic.

#### General Parish Characteristics

- 3.3. The Parish lies to the south of Horsham, with the village of Cowfold at the intersection of the A272 and the A281. It is predominantly rural in character.
- 3.4. The historic market town of Horsham lies 6.6 miles to the north. Gatwick airport lies 16 miles to the north east.
- 3.5. The Parish is bounded by the adjoining parishes of Nuthurst to the north west, Lower Beeding to the north, Shermanbury to the south, and West Grinstead to the west. It is also bound by Bolney parish to the east which lies within the Mid Sussex District.

#### Social Characteristics - Population

- 3.6. The census data from 2011 shows that the total population for the Parish was 1904. A total of 49.4% (941) were male, whilst 50.5% (963) were female.
- 3.7. The age structure comprises:
  - 379 persons aged between 0-17;
  - 574 persons aged between 18-44;
  - 590 persons aged between 45-64; and
  - 361 persons aged 65 and over.
- 3.8. The Office for National Statistics, published 2016-based Subnational Population Projections, in May 2018. These are broken down to local authority and health authority level. This confirms, the populations of all regions in England are projected to grow by mid-2026; regions in the north of England are projected to grow at a slower rate than those in the south. The South East is expected to grow by 574,000 people (6.4%) over 10 years (mid 2016 - mid 2026).<sup>2</sup>
- 3.9. For Horsham, the 2016 based subnational population projection, mid-2016 to mid-2041 is 138,523. This is an increase of 7222. This equates to a 5.5% population increase on the 2011 population (131,301).

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<sup>2</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2016based>



## Social Characteristics - Housing

3.10. At the time of the last Census there were a total of 739 occupied dwellings (household with at least one usual resident) in the Parish. This comprised:

- Whole house or bungalow: Detached - 314;
- Whole house or bungalow: Semi-detached - 243;
- Whole house or bungalow: Terraced (including end-terrace) - 138;
- Flat, maisonette or apartment: Purpose-built block of flats or tenement - 51;
- Flat, maisonette or apartment: Part of a converted or shared house (including bed-sits) - 18;
- Flat, maisonette or apartment: In a commercial building - 4; and
- Caravan or other mobile or temporary structure - 3.

3.11. Of the occupied households (739), the ownership/tenure were as follows:

- 226 owned outright;
- 328 owned with a mortgage or loan;
- 1 shared ownership (part owned and part rented);
- 67 social rented;
- 5 rented from Council;
- 62 other;
- 98 private rented;
- 85 private landlord or letting agency;
- 13 other; and
- 19 living rent free.

3.12. The census indicated there were a total of 1,388 cars owned by residents within the Parish. Ownership per household was as follows:

- Houses with no cars - 41;
- Houses with 1 car - 258;
- Houses with 2 cars - 282;
- Houses with 3 cars - 108;
- Houses with 4+ cars - 50.

3.13. The ONS published Household Projections for England in May 2019.<sup>3</sup> For Horsham, household projections mid 2001-mid 2041 is 72,000. This is an increase of 17,077 increase. This equates to a 31% increase on the 2011 population (54,923).

## Social Characteristics - Human Health

3.14. The Office for National Statistics holds records for “general health” at a Parish level. For Cowfold this indicates:

- Very good health - 952;
- Good health - 651;

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<sup>3</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

- Fair health - 199;
- Bad health - 36; and
- Very bad health- 66.

### Social Characteristics - Deprivation

- 3.15. The indices of multiple deprivation (IMD) is a composite indicator used to compare deprivation. It is made up of a number of factors including: employment, income, health, education/training, barriers to housing, crime and living environment. There are then standalone measures for deprivation affecting children and deprivation affecting older people.
- 3.16. The IMD can be expressed as a comparison to the rest of England and also as a comparison to the rest of Horsham District. IMD's are sub-divided into Lower Super Output Areas (LSOA's) and based on a range of indicators which reveal if an LSOA suffers from 'multiple' deprivation issues. LSOA's are areas of population size and do not always relate to exact Parish sizes, villages or geographies. LSOA's have an average population of some 1,500 residents, although they are not uniform in size.
- 3.17. If an area has low overall deprivation, this does not suggest that it has no deprivation issues, but that broadly there is not a multiple range of deprivation issues. An area which has low overall deprivation also may still have small pockets of deprivation. It is important to note that it is not a measure of wealth but solely a measure of deprivation. An area which has low deprivation will not necessarily be a wealthy area, and an area of higher deprivation will not necessarily be a poorer area.
- 3.18. The South East of England contains the second lowest number of the most deprived LSOA's, and highest number of the least deprived LSOA's. West Sussex is one of the least deprived higher level authorities, ranking 130th out of 152 upper tier authorities. Horsham District is one of the least deprived lower tier authorities in England, ranking 295th least deprived local authority out of 326. Within Horsham District there are 81 LSOAs, none which fall within the most deprived 30%. Conversely it contains 50 LSOA's in the least deprived 20%. Of this, 29 LSOA's are in the least deprived 10%.
- 3.19. There are 32,844 LSOA's in England, with 1 being the most deprived and 32,844 being the least deprived. The IMD data for the Parish, relative to the district and England, is shown below on Figure 3.

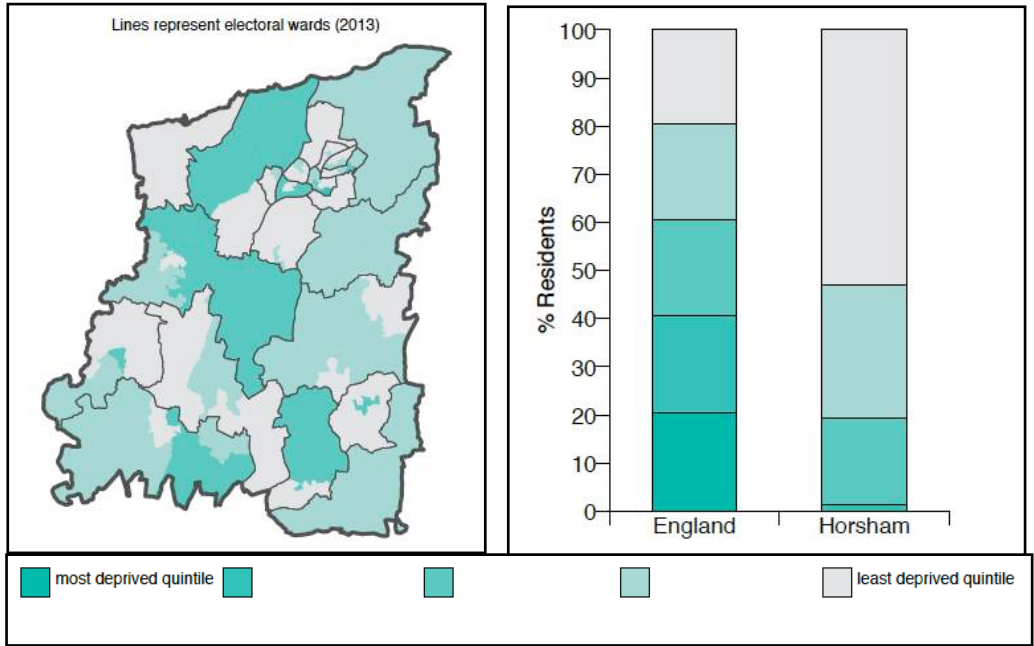


Figure 3: IMD data

3.20. There are 2 LSOA which cover Cowfold Parish. The extent of the LSOA's covering Cowfold Parish is illustrated in Figure 4.

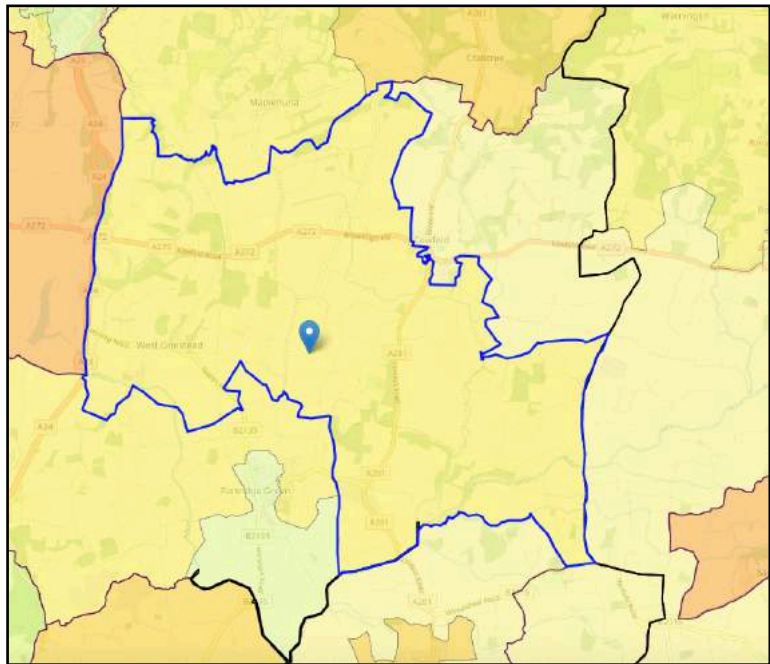


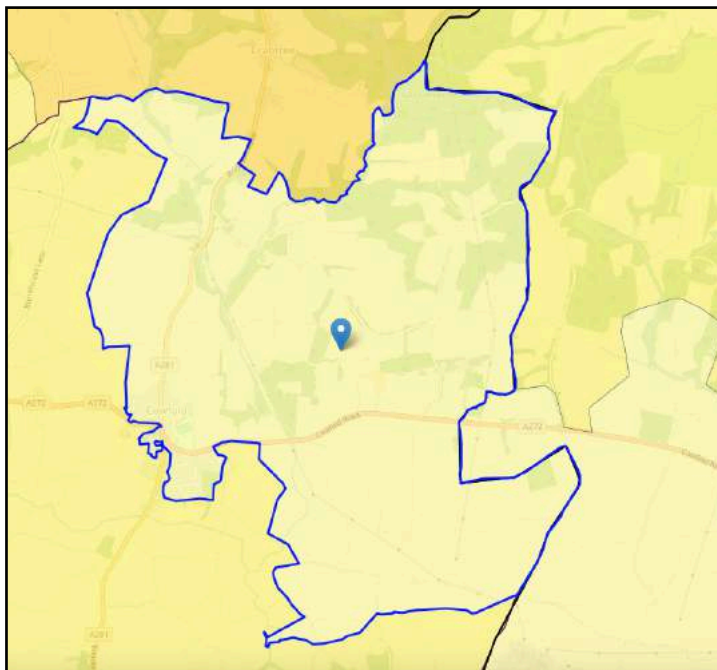
Figure 4: LSOA's covering Cowfold Parish

3.21. The assessment of deprivation for an LSOA is comprised of individual rankings, which are weighted and combined to produce the overall result.

3.22. The LSOA which covers the eastern part of the Parish is illustrated in Figure 5. The northern and eastern boundary of the LSOA is co-terminus with the Parish boundary.

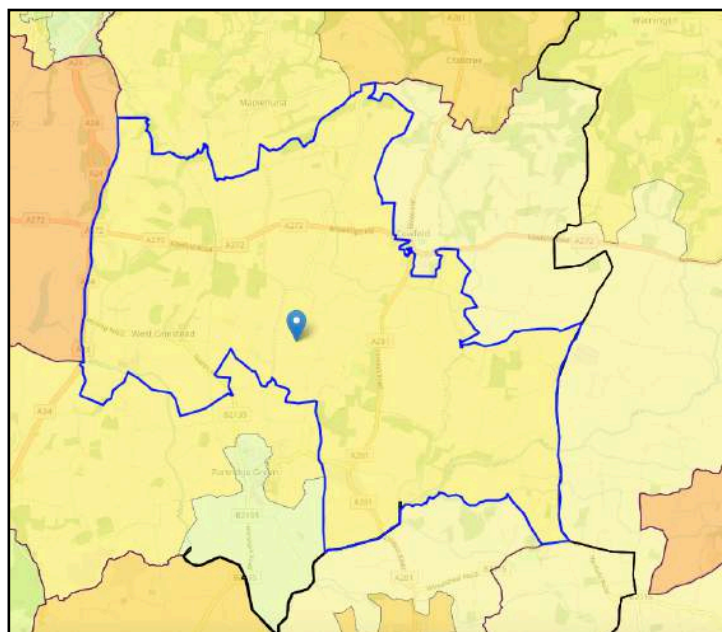
3.23. This LSOA covering the eastern part of the Parish has the following rankings:

- Income- 22,879 (least 40% deprived)
- Employment- 29,099 (least deprived 20%)
- Education & Training- 24,552 (least deprived 30%)
- Health- 25,652 (least deprived 30%)
- Crime- 27,291 (least deprived 20%)
- Barriers Housing/Services- 20,536 (least deprived 40%)
- Living Environment- 4,992 (most deprived 20%)
- Income Deprivation Affecting Children Index- 25,808 (least deprived 30%)
- Income Deprivation Affecting People Index- 15,600 (most deprived 50%)



**Figure 5:** LSOA covering eastern part of Cowfold Parish

3.24. The LSOA which covers the remaining part of the Parish is illustrated in Figure 6. This LSOA extend beyond the Parish boundary and includes parts of West Grinstead parish in the west and Shermanbury parish to the south.



**Figure 6:** LSOA covering western part of Cowfold Parish

3.25. This LSOA covering the western part of the Parish has the following rankings:

- Income- 29,974 (least deprived 10%)

- Employment- 31,045 (least deprived 10%)
- Education- 23,700 (least deprived 30%)
- Health- 32,147 (least deprived 10%)
- Crime- 25,603 (least deprived: 30%)
- Barriers to Housing and Services Domain- 2,067 (most deprived: 10%)
- Living Environment - 2,922 (most deprived: 10%)
- Income Deprivation Affecting Children Index- 27,775 (least deprived: 20%)
- Income Deprivation Affecting People Index- 30,665 (least deprived: 10%)

- 3.26. The majority of the rankings for the LSOA covering the eastern part of the Parish are within the least deprived. Living Environment and Income Deprivation Affecting People are the exception to this. The LSOA shows relatively higher deprivation with regards to the “Living Environment” (most deprived 20%). This can relate to the quality of dwellings, lack of central heating, air quality and traffic accidents. Rural parishes often rank poorly on this measure due to relatively high levels of traffic accidents on rural roads and an older stock of housing. Overall the IMD shows that the eastern LSSO has relatively low levels of deprivation and generally performs favourably compared to the rest of England.
- 3.27. The majority of the rankings for the LSOA covering the eastern part of the Parish are within the least deprived. Barriers to Housing and Services and Living Environment are the exception to this. The relatively high deprivation (most deprived 10%) that relates to “Barriers to Housing and Services”, is not unusual for rural Parishes. It is an issue that many other rural parts of Horsham District experience. The Barriers to Housing & Services is ranked with reference to matters such as distances to a post office, primary school, shop & GP. It also includes housing affordability. Rural parishes by their nature will generally be located some distance from key services, and in the south east have higher house prices. It is therefore unsurprising that the Parish ranks poorly against this indicator.
- 3.28. The LSOA also shows relatively higher deprivation with regards to the “Living Environment” (most deprived 10%). This can relate to the quality of dwellings, lack of central heating, air quality and traffic accidents. Rural parishes often rank poorly on this measure due to relatively high levels of traffic accidents on rural roads and an older stock of housing.
- 3.29. Overall the IMD shows that the LSOA covering the western part has relatively low levels of deprivation and generally performs favourably compared to the rest of England. However, it is clear that affordability and accessibility are two key issues.

#### Environmental Characteristics - Biodiversity, Flora and Fauna

- 3.30. The Parish supports a wide variety of plant and animal life and habitats, including woodland, hedgerows, grassland, as well as waterbodies and associated environments. Buildings within the Parish are also capable of providing a habitat to a wide variety of wildlife.
- 3.31. There are no Sites of Special Scientific Interest (SSI) within the Parish. There are a number of ancient woodlands in the Parish, primarily focussed in the north east of the Parish.

- 3.32. In response to the Scoping Report, Natural England (NE) advised their records show that the Parish of Cowfold includes priority habitats (deciduous woodland) and irreplaceable habitats (ancient woodland). NE advised this information needs to be added to the text and a map included.

### Environmental Characteristics - Landscape, Soil and Geology

- 3.33. The District Council commissioned a Landscape Character Assessment, published in October 2003. This identified 32 separate landscape characters across the district.
- 3.34. The Parish falls within the landscape character areas J3 Cowfold and Shermanbury Farmlands. This character area comprises gently undulating areas of low ridges and valleys which lie over the Weald Clay and the southern edge of the Tunbridge Wells Sands. The Assessment notes it has both small scale intricate field patterns of pasture and some larger scale arable fields. It confirms scattered woodlands, hedgerows and shaws create enclosure and restrict views and notes there are some more open areas where hedgerows have been lost.
- 3.35. The Assessment confirms the keys issues for the area include: loss of hedgerows and shaws; decline in traditional land management; and localised expansion of horse paddocks.
- 3.36. Overall, the Assessment confirms the landscape condition is declining. It also notes the sensitivity to change overall is moderate reflecting the moderate to high inter visibility of the area and moderate intrinsic landscape qualities. It confirms key sensitives are: large scale farm buildings; suburbanisation on main routes; and the introduction of telecommunication masts on the low ridges.
- 3.37. More recently, the District Council have commissioned a Landscape Capacity Assessment. The final report of this was published in April 2014. This is not a Landscape Character Assessment, but rather a Landscape Capacity Assessment. As noted in paragraph 1.6 of the final report, the key objectives are to provide an assessment of the landscape capacity of the land around existing Category 1 and Category 2 settlements, <sup>4</sup> to accommodate housing and employment development, and identify areas where new development could best be accommodated without unacceptable adverse landscape and visual impacts.
- 3.38. Paragraph 1.7 of the report sought to emphasise that the scope of the study was to assess landscape capacity only and that the overall suitability of the site for development would depend on a range of other considerations, noted as including access, infrastructure, constraints, other environmental considerations including flood risk, ecology, heritage and archaeology, and air quality.
- 3.39. The Assessment details all the countryside around the settlement of Cowfold was included within the capacity assessment. Five distinctive landscape study areas have been identified, these comprise CF1, CF2, CF3 , CF4 and CF5, which are illustrated in Figure 7.

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<sup>4</sup> As defined in the Horsham Local Development Framework Core Strategy



3.40. Landscape Study Area CF1. The Assessment confirms the area comprises a very gently undulating landform with regular and irregular field patterns bound by copses and hedgerows. It notes there is a mixed settlement edge which is harsh and abrupt in places with the presence of modern development, and is softened by trees in other parts. The Assessment confirms the landscape is in moderate condition due to intrusion of some large modern farm buildings. The visual sensitivity is identified as moderate as any housing development would be likely to be relatively well screened by existing copses and hedgerows. The overall landscape capacity is identified as moderate as the area retains an attractive rural character, with some landscape features and qualities sensitive to housing development. The Assessment notes it would be very important to protect important attractive views and maintain an attractive green approach into the village along the A272. Furthermore, it confirms there could be opportunities to secure enhancement of parts of the existing settlement edge through new development.

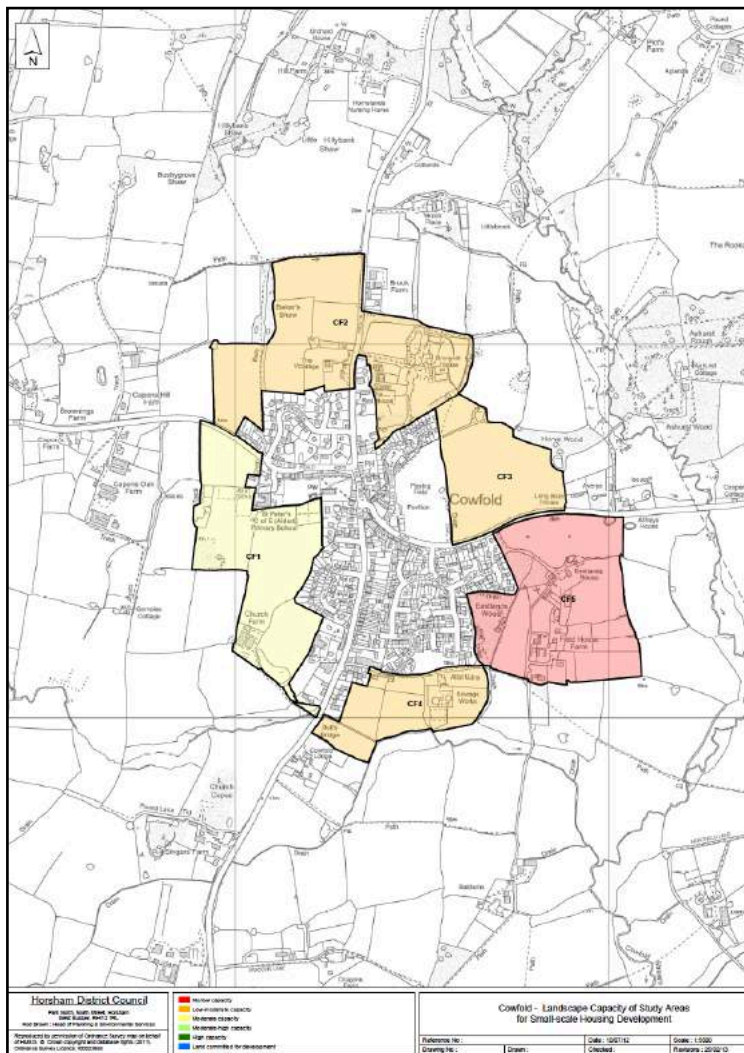


Figure 7: Cowfold Landscape Capacity

3.41. Landscape Study Area CF2. The Assessment confirms the area comprises ridge landform with gentle to moderate slopes to the south on the village side with steeper slopes to the north. It includes irregular small scale field patterns. The visual sensitivity is identified as moderate-high as the ridgeline and the slopes to the north are very visually sensitive due to the prominence of the elevated landform and attractive views northwards from them over the High Weald. The overall landscape capacity is identified as low-moderate. The Assessment confirms development would need to be restricted close to the existing settlement edge and considerable care would be needed to avoid unacceptable impacts resulting from development on the skyline or damage to the Brookhill approach into the village.



- 3.42. Landscape Study Area CF3. The Assessment confirms the area comprises flat to gently undulating landform. It includes medium-large scale field patterns bounded by shaws, copses and hedgerows. It notes a green corridor approach into the village. The Assessment confirms the landscape is in moderate condition due to partial erosion of field pattern. It notes despite the presence of shaws and woodland, the large field in the south of the area is extensively viewed from the A272. As a result, it confirms even small scale development would likely to be quite visually prominent. The landscape is identified as having as having low-moderate landscape capacity. The Assessment outlines it would be very important to maintain a broad green corridor along the A272 and restrict the extent of any development to the east with a woodland buffer to avoid the impression of sprawl into the wider countryside beyond the current built up area boundary south of the A272.
- 3.43. Landscape Study Area CF4. The Assessment confirms the area area comprises very gently sloping valley side which falls southwards towards a stream. It includes small scale, irregular field pattern. It has a predominantly strong rural character despite the presence of sewage works and allotments in one field. The Assessments confirms the dense network of hedgerows and hedgerow trees would be likely to reduce the visibility of any development from the wider landscape. The Assessment confirms given the strong overall rural character of the area and moderate visual sensitivity the area is assessed as low - moderate landscape capacity for small scale housing development. It outlines if access was necessary along the narrow country lane in the north of the area this could have an unacceptable adverse impacts on hedgerows and the rural character of the lane.
- 3.44. Landscape Study Area CF5. The Assessment confirms the area comprises gently undulating landform with medium scale, irregular field pattern. Existing village edge mostly softened by woodland and hedgerows. It is predominantly very open and exposed to views. The Assessment confirms there is moderate landscape character sensitivity with some landscape features and qualities sensitive to development. The Assessment confirms the high visual sensitivity of the area results in a no/low landscape capacity for small scale housing development. Furthermore it notes any development could easily be perceived as an incursion into open countryside unrelated to the current settlement boundaries.
- 3.45. The northern eastern part of the Parish lies within the High Weald AONB. The key characteristics of the High Weald AONB are:
- Dispersed historic settlements of farmsteads and hamlets, and late medieval villages founded on trade and non-agricultural rural industries;
  - Ancient routeways (now roads, tracks and paths) in the form of ridge-top roads and a dense system of radiating droveways. Ancient routeways are often narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks;
  - The great extent of ancient woods, gills, and shaws in small holdings, the value of which is inextricably linked to long-term management;

- Small, irregularly shaped and productive fields often bounded by (and forming a mosaic with) hedgerows and small woodlands, and typically used for livestock grazing; small holdings; and a non-dominant agriculture; within which can be found distinctive zones of heaths and inned river valleys.

3.46. In response to the Scoping Report, Natural England advised part of the Parish (to the north-east) includes a designated landscape, the High Weald Area of Outstanding Natural Beauty and should be added to the text and a map included. NE also advised an indicator in relation to impact on the AONB should be included. This information has been included in the SA and the extent of the High Weald AONB, in due course, will be illustrated on the Proposals Map.

#### Environmental Characteristics - Heritage

3.47. The Parish includes a Conservation Area which covers the central part of Cowfold. The extent of the Conservation Area is illustrated in Figure 8.

3.48. There are a total of 63 Listed Buildings within the Parish, 1 of which is Grade I (Parish Church of St. Peter).

3.49. An Historic Environment Report (HER) for the Parish has been sourced from West Sussex County. The Report sets out the historic assets of the Parish and includes details of monuments, Iron Age pottery, Roman coins, post medieval pottery and prehistoric weapons which have been identified through surveys and digs.

3.50. Historic England did not provide a response to the Scoping Report.

#### Environmental Characteristics - Air Quality and Climate Change

3.51. Two Air Quality Management Area (AQMAs) have been declared within Horsham District, in the centres of Cowfold and Storrington, Both have been designated for their exceedences of the annual mean objective for nitrogen dioxide.

3.52. The extent of the AQMA in Cowfold is illustrated in Figure 9.

3.53. A draft Air Quality Action Plan (AQAP) has been prepared for Cowfold and was submitted to Defra in 2013. This identifies a range of possible measures aimed at improving air quality within Cowfold. The draft AQAP was prepared by HDC in conjunction with West Sussex County Council.

3.54. The draft AQAP confirmed it will be subject to public consultation with feedback from the consultation process informing the final Action Plan.

3.55. As set out in the draft report, it is envisaged the AQAP will set out what will be implemented to reduce nitrogen dioxide pollution in Cowfold. Furthermore the final AQAP will “describe the rationale behind the measures including the costs and benefits and provide a timetable for implementation. The effectiveness of measures and progress with implementation will be the subject of annual review as part of the Local Air Quality Management review and assessment process.”

3.56. The draft AQAP set out the air quality improvements required in Cowfold. This comprised a required nitrogen dioxide concentration reduction and a required NOx emission reduction.

3.57. The draft AQAP also identified the overriding principle of the AQAP. This comprised:

- Cowfold specific measures to manage local traffic and to promote alternative transport options;
- District wide measures to reduce traffic emissions and mitigate the impacts of development on air quality.

3.58. The draft AQAP confirms the Cowfold specific draft Action Plan measures have been incorporated into two main project areas, a traffic management feasibility study and the promotion of alternative transport options.

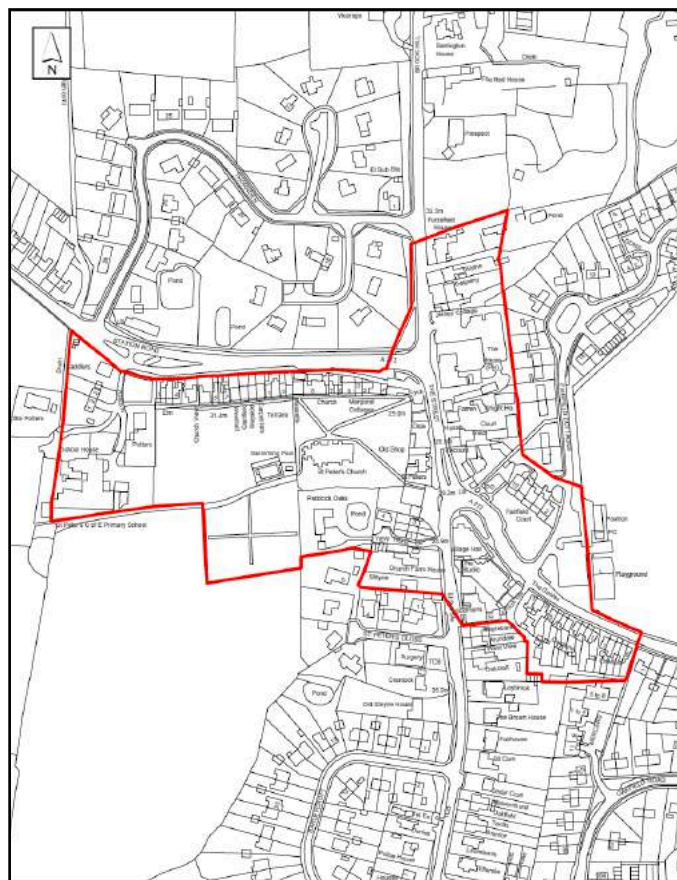


Figure 8: Cowfold Conservation

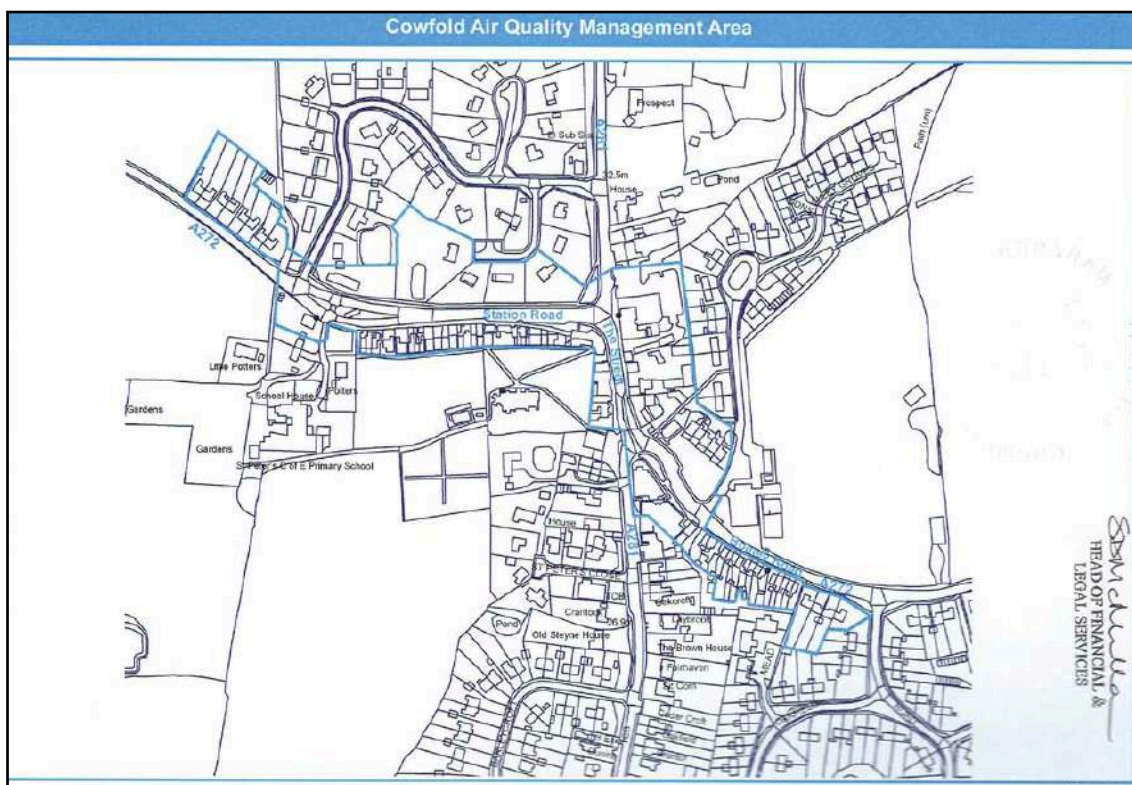
3.59. The draft AQAP acknowledges that Horsham has areas of poor air quality coupled with a demand for new development. It was therefore considered appropriate to include district wide action plan measures to reduce traffic emissions on the local road network and to mitigate the impacts of development on air quality. The Report confirms, two key measures in this respect:

- The development of a local Air Quality Planning Policy Guidance document; and
- The adoption of a District Emission Reduction Strategy.

3.60. In response to this, the adopted HDPF includes Strategic Policy 24: Environmental Protection which confirms development will be expected to “contribute to the implementation of local Air Quality Action Plans and do not conflict with its objectives.”

3.61. The 2016 Annual Status Report for Horsham District Council (July 2016) confirms the monitoring data results for nitrogen dioxide. On the basis of these results the boundary of the Cowfold AQMA remain unchanged.

- 3.62. The Report details the key actions completed in 2015. It also notes the achievement of congestion improvement measures in both Storrington and Cowfold has been challenging as “there are no easy solutions.” In light of this, the Report confirms HDC continues to work with West Sussex County Council to explore traffic management measures to reduce congestion and improve air quality.
- 3.63. The Report identifies the Council’s priorities for Cowfold. This is identified as progressing further evaluation of traffic management/congestion improvements. It notes “the plans are to reconvene the Action Plan Steering Group in Cowfold with the aim of progressing the identified measures and communicating with local residents and the wider public.” The Report also confirms following the completion of actions, the Action Plan will be updated. To date no further updates have been published.
- 3.64. The climate of the Parish is generally warm temperate. Temperatures vary from an average low of 3.2 degrees Centigrade in January to an average high of 16.6 degrees, in July. Rainfall is relatively consistent throughout the year. Precipitation is the lowest in February, with an average of 39mm, with most precipitation falling in November, averaging 68mm.



**Figure 9:** Cowfold Air Quality Management Area

**Environmental Characteristics - Water and Flooding**

- 3.65. The Parish lies within the Adur and Ouse Catchment Management Area. There are no main rivers in the Parish. The Cowfold stream flows from the west of the Parish south to Shermanbury Place where it joins the River Adur.



3.66. HDC's Level 1 Strategic Flood Risk Assessment (SFRA) outlines that the majority of the Parish lies within Flood Zone 1. A small proportion of the south western part of the Parish lies within Flood Zone 2 and Flood Zone 3a/3b, the extent of which is identified in Figure 10.

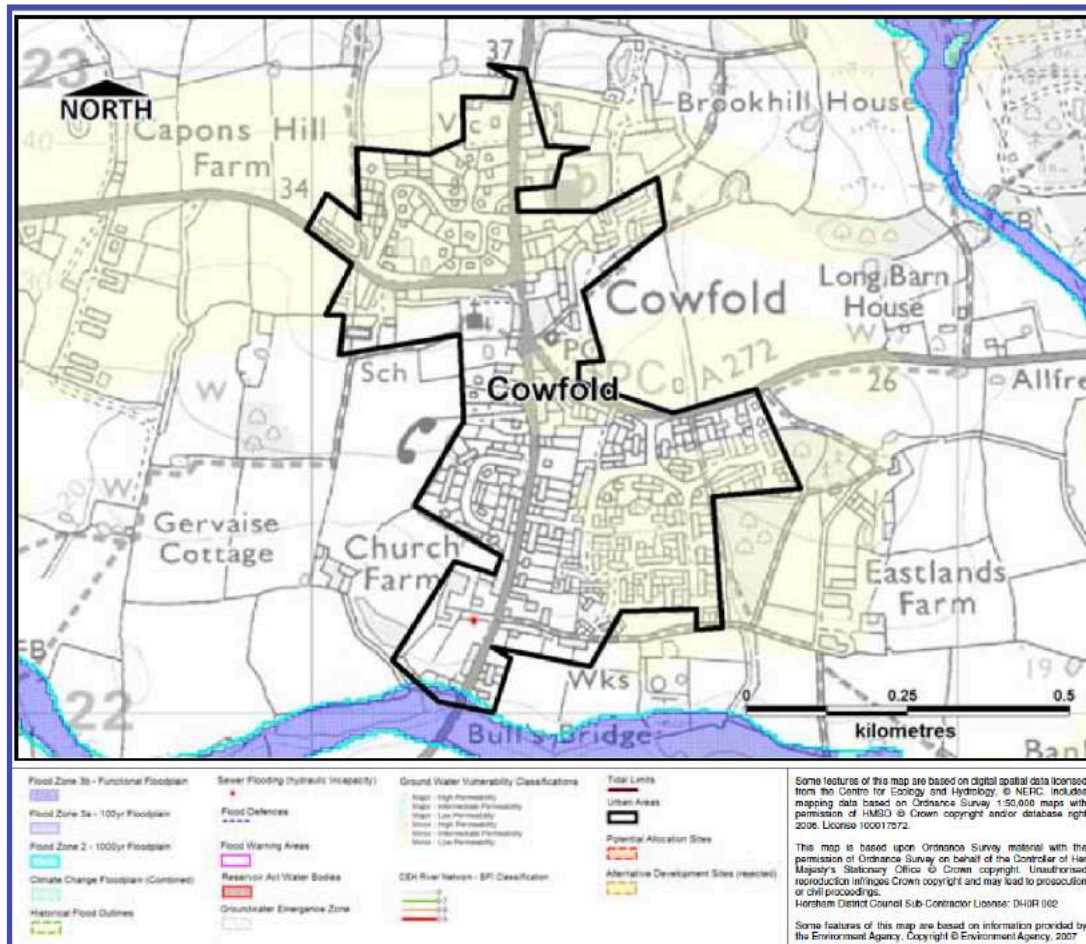


Figure 10: Strategic Flood Risk Assessment: Extent of Flood Zones

3.67. In response to the Scoping Report, the Environment Agency, advised of support for the inclusion of objective 2 – Ecological and objective 4 – water and flooding and associated indicators.

3.68. In addition, the Environment Agency advised that the Scoping Report takes account of relevant policies, plans and strategies including the local Strategic Flood Risk Assessment, flood risk strategies and the South East River Basin Management Plan.

### Economic Characteristics - Employment

3.69. The 2011 Census reveals that the number of residents of working age (16-74) was 1,371. Of this figure 1085 (79%) were economically active, and 286 (21%) were economically inactive.

3.70. Of those that were economically active, 1,011 were in employment. The split in roles is as follows:

- 189 - employed part time;
- 584 - employed full time;
- 238 - self employed;

- 39 - unemployed; and
- 35 - full time student.

3.71. Of those that were economically inactive (286). The split in roles is as follows:

- 142 - Retired;
- 38 - Student (including full-time students);
- 53 - Looking after home or family;
- 19 - Long-term sick or disabled;
- 34 - Other;
- 10 - Unemployed: Age 16 to 25;
- 14 - Unemployed: Age 50 to 74;
- 2 - Unemployed: Never worked; and
- 17 - Long-term unemployed.

3.72. Of those who were aged 16 to 74 in employment (1,038) indicated the industry in which they worked as follows:

- Agriculture, forestry and fishing- 18;
- Mining and quarrying - 1;
- Manufacturing - 97;
- Electricity, gas, steam and air conditioning supply - 1;
- Water supply; sewerage, waste management and remediation activities - 8;
- Construction - 96;
- Wholesale and retail trade; repair of motor vehicles and motor cycles - 139;
- Transport and storage - 78; and
- Accommodation and food service activities - 48
- Information and communication - 44;
- Financial and insurance activities - 41;
- Real estate activities- 19;
- Professional, scientific and technical activities - 75;
- Administrative and support service activities - 56;
- Public administration and defence; compulsory social security - 48
- Education - 87;
- Human health and social work activities- 11; and
- Other - 71.

3.73. Of those who were aged 16 to 74 in employment (1,038) indicated their occupation as follows:

- Managers, directors and senior officials - 167;
- Professional occupation- 191;
- Associate professional and technical occupations- 157;
- Administrative and secretarial occupations- 103;
- Skilled trades occupations - 146;
- Caring, leisure and other service occupations - 101;
- Sales and customer service occupations - 58;
- Process plant and machine operatives - 44; and
- Elementary occupations - 71.

3.74. All usual residents aged 16 and over indicated their qualifications were as follows:

- No qualifications - 268;
- Level 1 qualification- 206;
- Level 2 qualification - 278;
- Apprenticeship- 53;
- Level 3 qualification - 198;
- Level 4 qualification - 504;
- Other qualification - 63;
- Schoolchildren and full time-time students: Age 16 to 17 - 38;
- Schoolchildren and full time-time students: Age 18 and over - 31;
- Full-time students: Age 18 to 74: Economically active: In employment - 16;
- Full-time students: Age 18 to 74: Economically active: Unemployed - 3; and
- Full-time students: Age 18 to 74: Economically inactive - 12.

3.75. There are a number of businesses operating in the Parish. These include a public house, cafe, vehicle repair/garage, 2 car sales, beauty salon, hairdresser, barber, restaurant, retail units, IT business and retail outlet. There is also a small family run trading estate at Oakendene Industrial Estate.

3.76. Elsewhere, economically active residents either commute out of the Parish, work from home, have a land use based profession within the immediate locality, or work from other individual business premises.

#### **Economic Characteristics - Material Assets**

3.77. Whilst the Parish is rural, it nonetheless benefits from a range of material assets. These include a sports pavilion, playing fields, primary school, surgery, restaurants, public houses, vehicle repairs retail units, car sales and small businesses.

3.78. There is an extensive Public Rights of Way (PRoW) network which runs throughout the Parish.

3.79. In addition to this, the Parish benefits from sports and leisure clubs and societies. These include bridge club, bell ringers, community choir, women's institute, history society, horticultural society, Royal British Legion and social committee.

#### **Updated Review of Other Plans, Programmes, Policies, Strategies and Initiatives that may Influence the Content of the Cowfold Neighbourhood Plan**

3.80. In response to the consultation on the Scoping Report additional documents have needed to be added to the list of Background Documents that have influenced the content of the CNP.

3.81. Since consultation on the Scoping Report in March 2018, the revised NPPF was published in July 2018 and more recently in February 2019. It replaces the first NPPF published in March 2012.



- 3.82. It sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.
- 3.83. To support the Government's objective of significantly boosting the supply of homes, the NPPF states strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.

#### Challenges Facing Cowfold Parish

- 3.84. The baseline information and plans, programmes, policies, strategies, guidance and initiatives help to determine the sustainability issues and challenges facing the Parish.
- 3.85. Whilst the Parish generally offers a high quality of life, they will need to manage a number of issues over its lifetime in order to ensure the area continues to be successful and the negative impacts of development are properly mitigated. These challenges include:

1. Protect and maintain the village atmosphere and sense of community.
2. Protect the rural character of the Parish.
3. Integrate housing within the village.
4. Meet current and future housing need.
5. Air quality in Cowfold.
6. Traffic Congestion and highway safety.

#### 4. SUSTAINABILITY FRAMEWORK - OBJECTIVES AND INDICATORS

- 4.1. This SA seeks to test the contribution the CNP will make towards achieving sustainable development, through the identification of a number of objectives and indicators, known as the Sustainability Framework. These are used to judge the sustainability impacts of the policies within the CNP.
- 4.2. The objectives are based on the three strands of sustainability; i.e. social, economic and environmental. The indicators are chosen to quantify and measure the achievement of each objective.
- 4.3. The Sustainability Framework has emerged through careful appraisal of relevant International, National, Regional, District and Local Plans and Programmes, the collection of baseline data, local knowledge of sustainability challenges faced in the Parish and a SWOT analysis.
- 4.4. The Sustainability Framework was the subject of consultation at the Scoping Report stage. The sustainability objectives and their corresponding indicators are set out below. Colour coding of the objectives is provided to indicate which relate to environmental; social or economic.

<b>Environmental Objective</b>
<b>Social Objective</b>
<b>Economic Objective</b>

<b>Environmental - Objective 1 - Countryside: To conserve and enhance the rural character of the Parish</b>
<ul style="list-style-type: none"> <li>• Number of new residential dwellings approved within the Parish beyond the defined settlement boundaries and areas allocated for development;</li> <li>• Quantum of new employment floor space approved within the Parish beyond defined settlement boundaries and areas allocated for development.</li> <li>• Number of new residential dwellings approved within the High Weald Area of Outstanding Natural Beauty.</li> </ul>

<b>Environmental - Objective 2 - Ecology: To protect and enhance the biodiversity of the Parish</b>
<ul style="list-style-type: none"> <li>• Extent of the Ancient and Semi-Natural Woodland within the Parish;</li> <li>• Extent of the Priory Habitat;</li> <li>• Condition and extent of hedgerows;</li> <li>• Sussex Wildlife Trust records.</li> </ul>

**Environmental - Objective 3 - Heritage Assets: To protect and enhance the heritage assets of the Parish**

- Number and condition of Listed Buildings;
- Number of heritage assets and their setting protected as part of development.

**Environmental - Objective 4 - Water & Flooding: To ensure development does not take place in areas at risk of flooding or where it may cause flooding elsewhere**

- Number of properties at risk of flooding within the Parish;
- Number of applications approved within the Parish, contrary to the advice of the Environment Agency on flood risk grounds.

**Social - Objective 5 - Air Quality: To improve air quality in the AQMA**

- Number Number of applications approved within the AQMA which result in additional trips;
- Number of applications approved which result in additional trips through the AQMA.

**Social - Objective 6 - Transport: To improve highway safety**

- Police accident data;
- Number of highway safety schemes delivered within the Parish.

**Social - Objective 7 - Housing: To enable those with identified local housing needs to have the opportunity to live in an affordable home**

- Number of new home completions;
- Number of affordable dwelling completions;
- Number registered on the Council's housing waiting list wishing to live in the Parish.

**Social - Objective 8 - Crime: To ensure residents live in a safe environment**

- Overall crime rates;
- Number of domestic burglaries.

**Social - Objective 9 - Sustainable Transport Patterns: To increase the opportunities for residents and visitors to travel by sustainable and non-car modes of transport**

- Number of new sustainable and public transport facilities provided in the Parish, such as bus shelters, cycle lanes, pedestrian crossings, etc;
- Bus service provision;
- Number of households within a 10 minute walk of (approximately 800m) a bus stop with a frequency of more than 1 per hour during the working day.

**Social - Objective 10 - Community Infrastructure: To maintain and enhance the community infrastructure within the Parish**

- Quantum of new community infrastructure facilities approved in the Parish;
- Quantum of Section 106/ Community Infrastructure Levy (CIL) monies secured to contribute to community infrastructure provision in the Parish;
- Number of households within a 10 minute walk (approximately 800m) of public recreational space.

**Economic - Objective 11- Economy: To maintain and enhance employment opportunity and provision within the Parish**

- Levels of unemployment within the Parish;
- Total amount of employment floor space created in the Parish;
- Amount of employment floor space lost to other uses in the Parish.

**Economic - Objective 12 - Wealth: To ensure high and stable levels of employment and address disparities in employment opportunities in the Parish so residents can benefit from economic growth**

- Indices of Multiple Deprivation;
- Percentage of residents who are unemployed;
- Percentage of residents who are economically active.

- 4.5. The consultation draft CNP sets out a number of strategic objectives. These are important as they state what the Plan is aiming to achieve through its overall strategy and accompanying policies.
- 4.6. The strategic policies have been chosen in order to help solve or mitigate as many of the issues and challenges for the Parish as possible through the planning system.
- 4.7. The following reflect the Strategic Objectives of the CNP.

<b>Strategic objectives of the Cowfold Neighbourhood Plan</b>
<b>To conserve and enhance the rural character of the Parish</b>
<b>Conserve and enhance the historic environment</b>
<b>To reduce the impact of traffic, volume and speed, including to improve air quality</b>
<b>To ensure all sections of the community have access to key local services</b>
<b>To provide the opportunity for appropriately sized, affordable and sustainable housing</b>
<b>To encourage economic development and job creation</b>

These have been assessed for compatibility with the 13 Sustainability Objectives, as detailed below:

		CNP Strategic Objectives					
		1	2	3	4	5	6
Sustainability Objectives	1	✓	✓	✓	X	X	X
	2	✓	✓	✓	0	X	X
	3	✓	✓	0	0	X	X
	4	✓	✓	0	0	0	0
	5	✓	✓	✓	0	X	X
	6	✓	✓	✓	0	0	0
	7	X	X	0	0	✓	✓
	8	0	0	0	0	0	0
	9	0	0	✓	✓	0	0
	10	X	X	0	✓	0	0
	11	X	X	X	✓	0	✓
	12	X	X	X	✓	0	✓

KEY	
✓	Compatible
X	Incompatible
0	No link/ Neutral

*Figure 11: Assessment of CNP Strategic Objectives and SA objectives*

- 4.8. The table demonstrates that most of the HNP Strategic Objectives and the Sustainability Objectives are compatible or have a neutral impact. This indicates that the HNP is being prepared positively with the aim of solving some of the sustainability issues identified and that the Sustainability Objectives are appropriate to measure the extent to which it does.
- 4.9. A comparative assessment has been undertaken of the policies to test their mutual compatibility. This is shown in the table below. This confirms that most policies are either compatible or have a neutral impact. In recommending the preferred policy option, weight is placed on the Sustainability Objectives most closely linked with the specific policy being appraised.

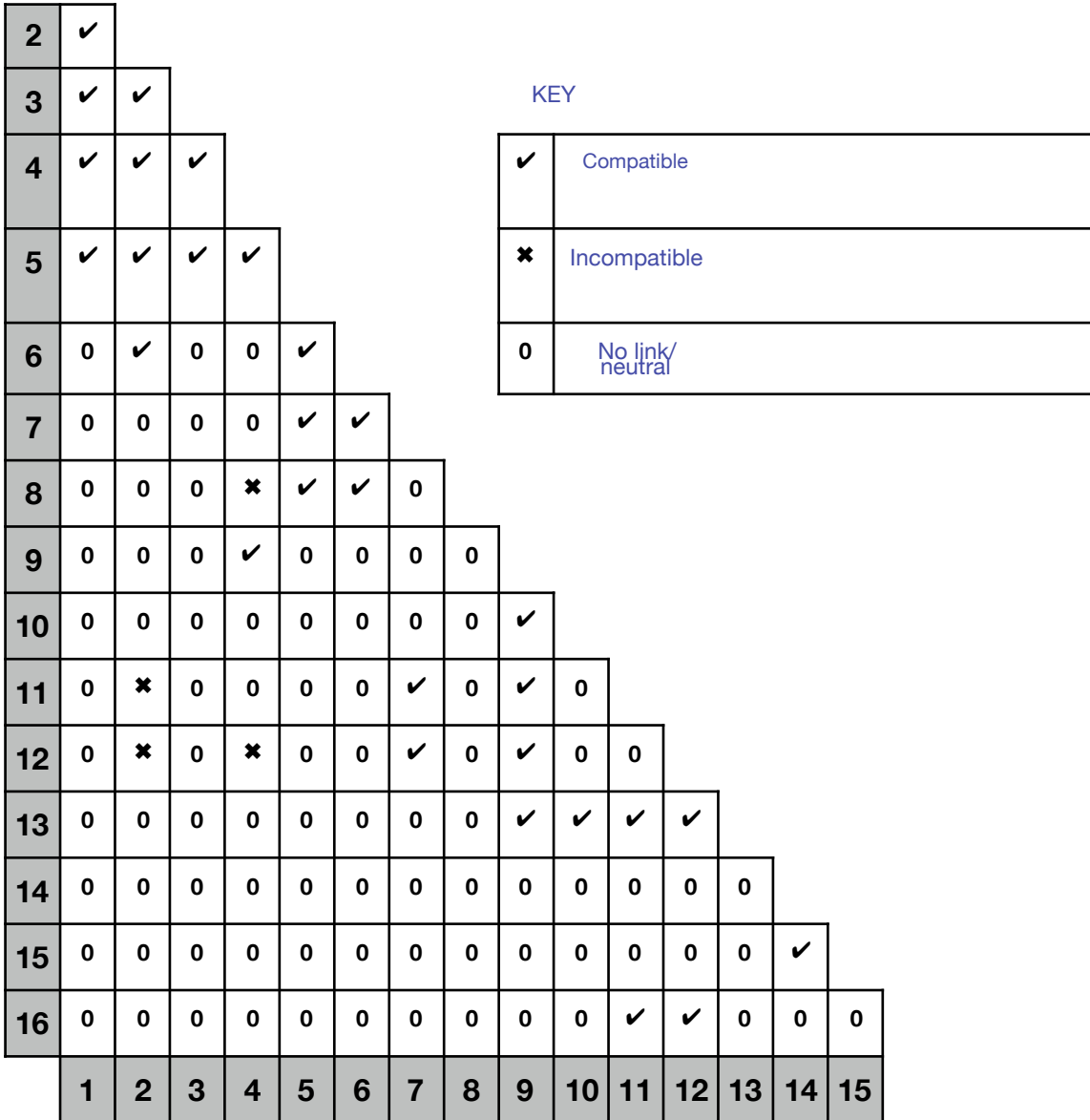


Figure 12: Policy Appraisal



## **5. APPRAISAL OF THE COWFOLD POLICY OPTIONS AGAINST THE SUSTAINABILITY FRAMEWORK**

- 5.1. In preparing the CNP a range of policy areas have been considered and a range of options for each policy have been identified. These have been prepared based on the review of other relevant plans, programmes, policies, strategies and initiatives, the extensive baseline data for the Parish, and the overarching strategic objectives of the CNP. This is reflective of Stage 3 of the SA process.
- 5.2. All policy options have been appraised, to assess the impact on the 12 Sustainability Objectives set out in the Sustainability Framework. These appraisals are set out in the tables attached at Appendix 2.
- 5.3. The overall appraisal ensures that the policies and aims selected and taken forward in the Pre-submission CNP are the most sustainable, given reasonable alternatives. Whilst a number of the individual policies may have a negative impact, particularly on a specific small number of objectives, overall the policies and aims in the CNP, taken as a whole will have a significant positive impact on the sustainability of the Parish.
- 5.4. Furthermore, the negative impacts have been positively mitigated, as far as reasonably possible, such as by the location of new housing development on sites that are most sustainably located relative to the siting of services and facilities, and on impact on the countryside and setting of the settlements.
- 5.5. The policies seek the inclusion of a number of mitigation measures to minimise the negative effects of development as far as possible. The negative effects which have been identified are limited to the immediate environment and have been mitigated as far as possible. It is not considered that the cumulative in combination effects will be significant.
- 5.6. With respect to housing allocations, the SA has sought to test a range of options which could facilitate the delivery of new housing in the Parish.
- 5.7. In addition, all potential housing sites were tested through the SA Framework (see Appendix 1). The Assessment has highlighted that all sites will positively contribute to the delivery of housing. The majority would be likely to include some provision of affordable housing. Sites that are close to existing services and facilities score more favourably against the objectives which seek to enhance non-car modes of travel.
- 5.8. The Assessment shows the majority of potential housing sites would have some negative impact on Environmental Objectives. The extent of this varies dependent on the location of the site. In order to seek to facilitate the delivery of housing need in the Parish, it is considered inevitable there will be some harm, particularly against Environmental Objectives. Mitigation measures to minimise this have been duly considered and are set out in individual Housing Sites Assessments (Appendix 1).

- 5.9. Having assessed reasonable alternative sites, the Parish Council elected to allocate land at Brook Hill and Potters. The Assessment has demonstrated these will overall, and on balance, positively meet the Sustainability Objectives of the Plan. It is considered the proposed allocations presents the most sustainable option for the Parish as the sites with the least environmental effects have been allocated.
- 5.10. Set out below is a table which summarises the predicted effects of the CNP, by reference to the objectives set out in the Sustainability Framework.

*Figure 13: Predicted Effects of the Cowfold Neighbourhood Plan*

SA Objective	Explanation
<p><b>Objective 1 - Countryside:</b> To conserve and enhance the rural character of the Parish</p>	<p>Policy 2 seeks to conserve and enhance green infrastructure, Policy 3 seeks to designate Local Green Space for special protection, Policy 5 seeks to ensure the protection of open space, whilst Aim 4 seeks to minimise light pollution.</p> <p>Whilst the Plan promotes housing development, Policy 10 seeks to focus unidentified 'windfall' housing within the defined built-up area of Cowfold, and the two housing sites allocated for residential development are located contiguous with the built-up area boundary, and are subject to a number of criteria which seek to ensure the effect of the development on the rural character of their surroundings is mitigated.</p> <p>It is considered that the Neighbourhood Plan, as a whole, will positively contribute to the conservation and enhancement of the rural character of the Parish.</p>
<p><b>Objective 2 - Ecology:</b> To protect and enhance the biodiversity of the Parish</p>	<p>Policy 2 seeks to conserve and enhance green infrastructure of the Parish, Policy 3 seeks to designate Local Green Space for special protection, and Policy 5 seeks to ensure the protection of open space.</p> <p>Areas allocated for housing development have been selected having regard to a number of factors, including the potential impact of the development on existing habitats and biodiversity.</p> <p>The two areas allocated for residential development are supported by policies which seek to ensure that existing landscape features, which contribute to biodiversity are protected, and enhanced, where possible.</p> <p>It is considered the Plan, overall will positively contribute to the protection and enhancement of the biodiversity of the Parish.</p>
<p><b>Objective 3 - Heritage Assets:</b> To protect and enhance the heritage assets of the Parish</p>	<p>Aim 5 sets out support for the protection of heritage assets and their setting, and Policy 4 sets out support for the preservation or enhancement of the character and appearance of the Conservation Area and its setting.</p> <p>Areas allocated for housing development have been selected having regard to, amongst others, the potential effect on designated heritage assets and their setting.</p> <p>It is considered that the Cowfold Neighbourhood Plan will positively contribute to the protection and enhancement of heritage assets within the Parish.</p>

SA Objective	Explanation
<p><b>Objective 4 - Water and Flooding:</b> To ensure development does not take place in areas at risk of flooding or where it may cause flooding elsewhere</p>	<p>Aim 2 supports development proposals that, amongst other things, deliver rain/domestic water harvesting and recycling systems; whilst Policy 1 seeks for development proposals to reduce the risk of flooding either onsite or to adjacent areas, ensure that proposals are located in areas at the lowest risk of flooding, and incorporate sustainable drainage techniques.</p> <p>Areas allocated for housing development have been selected having regard to amongst other things, their setting in relation to designated flood risk zones, to ensure that they were at lowest risk of flooding in relation to alternative options.</p> <p>It is considered that the Cowfold Neighbourhood Plan will positively contribute to ensuring development does not take place in areas at risk of flooding or where development may cause flooding elsewhere.</p>
<p><b>Objective 5 - Air Quality:</b> To improve air quality in the AQMA</p>	<p>Aim 1 supports development proposals that do not have an adverse effect on air quality and support proposals that provide traffic calming and/or gating measures which have the aim of reducing queuing traffic within the AQMA.</p> <p>Aim 12 seeks to improve traffic management in the Parish including, reduction in HGVs routing through the Parish. Other policies seek to encourage non-car modes of travel including through the improvement and upgrade of the pedestrian and cycling environment as set out in Aim 13, Aim 14 and Aim 15.</p> <p>The selection of housing sites has in part had regard to their proximity to local services and facilities with the intent of seeking to promote non-car modes of travel to access services and facilities within the Parish from these developments.</p> <p>Areas allocated for housing development are located outside of the Cowfold AQMA, and the allocations seek for the provision of traffic calming measures, where appropriate.</p> <p>Additional residential development may, in itself, generate traffic passing through the AQMA. However, it is considered that with the imposition of criteria, and other policies seeking to improve the air quality of the AQMA, that the Cowfold Neighbourhood Plan will overall have a neutral or net positive effect on improving air quality in the AQMA.</p>
<p><b>Objective 6 - Transport:</b> To improve highway safety</p>	<p>Aim 12 supports measures to improve traffic management in the Parish including a reduction in the HGVs routing through the Parish, Aim 13 seeks to support developments which would improve road safety, Aim 14 seeks to support proposals that would encourage sustainable transport options that facilitate a reduction in motorised vehicle usage, Aim 15 seeks to support improvements that upgrade and enhance the pedestrian and cycling environment, and Aim 16 supports the designation of quiet lanes.</p> <p>Areas allocated for housing development have been selected having regard to, amongst other things, their proximity to services and facilities within the Parish and non-car modes of transport network. These seek to foster access to services and facilities by means other than the private car.</p> <p>Having regard to these measures, it is considered that overall, the Cowfold Neighbourhood Plan will positively contribute to improving highway safety.</p>

SA Objective	Explanation
<p><b>Objective 7 - Housing:</b> To enable those with identified local housing needs to have the opportunity to live in an affordable home</p>	<p>The Plan seeks to facilitate the delivery of residential development that will meet the needs of the Plan area, in conformity with the strategic policies of the HDPF. It seeks to meet this need via the allocation of two housing sites, with additional housing development supported, subject to certain criteria, through windfall development.</p> <p>Policy 13 supports the delivery of a mix of dwelling types and sizes to meet the needs of the area, Aim 10 supports the delivery of affordable housing to meet the needs of those with a local connection with Cowfold, and Policy 11 seeks to support the retention and/or increase of the existing housing stock for retired residents in line with population and demographic changes.</p> <p>The Plan seeks to meet housing needs whilst seeking to avoid, minimise, or mitigate the potential harmful effects of such development.</p> <p>It is considered that the Cowfold Neighbourhood Plan will positively contribute to enabling those with identified local housing needs to have an opportunity to live in an affordable home within the Parish.</p>
<p><b>Objective 8 - Crime:</b> To ensure residents live in a safe environment</p>	<p>Aim 3 supports proposals that enhance the public realm, and open space of the local community, Policy 6 supports the retention of community services and facilities, whilst Policy 7 seeks to enhance youth facilities. Policy 9 seeks to ensure that residential development achieves a high quality of layout and character.</p> <p>On this basis, and in so far as the Cowfold Neighbourhood Plan is able, it is considered it will positively contribute to ensuring the residents of the community can live in a safe environment.</p>
<p><b>Objective 9 - Sustainable Transport Patterns:</b> To increase the opportunities for residents and visitors to travel by sustainable and non-car modes of transport</p>	<p>Aim 14 supports proposals that provide sustainable transport options and facilitate a net reduction in motorised vehicle usage, Aim 15 supports improvements and upgrades to the pedestrian and cycling environment, and Aim 16 supports the identification of quiet lanes. These will all positively contribute to providing opportunities to travel by non-car modes of transport.</p> <p>Areas allocated for housing development in the Parish have been selected having regard to, amongst other things, their proximity to community services and facilities, thereby promoting the opportunity for future residents to access services by non-car modes of transport.</p> <p>Overall, the Neighbourhood Plan has sought to promote opportunities for travel by non-car modes of transport, acknowledging that the provision of a number of public transport services lies outside the control of the Neighbourhood Plan.</p> <p>It is considered overall, the Neighbourhood Plan will positively contribute to opportunities for sustainable, non-car modes of transport.</p>

SA Objective	Explanation
<p><b>Objective 10 - Community Infrastructure:</b> To maintain and enhance the community infrastructure within the Parish</p>	<p>Policy 2 supports the retention of green infrastructure for retention of Local Green Space, Policy 5 seeks to preserve and enhance open space, Policy 6 seeks to retain community services and facilities, Aim 6 supports retention and expansion of medical facilities, Aim 7 supports ensuring there is adequate capacity at local primary schools and secondary schools, Policy 7 supports provision of youth facilities and Policy 8 seeks to ensure the protection of existing allotments.</p> <p>These measures individually and collectively, seek to ensure that services and facilities within the community are retained and protected.</p> <p>Areas allocated for housing development are subject to criteria to ensure that additional facilities, directly and proportionately related to those developments that contribute to community infrastructure are also retained and/or brought forward in conjunction with those schemes.</p> <p>It is considered the Cowfold Neighbourhood Plan will positively contribute to maintaining and enhancing community infrastructure.</p>
<p><b>Objective 11 - Economy:</b> To maintain and enhance employment opportunity and provision within the Parish</p>	<p>Policy 14 seeks to facilitate the enhancement of small scale businesses, set out criteria for the support of business development more generally, and seek to resist the loss of any land currently in business or employment use. Policy 15 supports superfast broadband networks to serve the Parish, including to facilitate working from home.</p> <p>It is considered that the Neighbourhood Plan will positively contribute to maintaining and enhancing employment opportunity and provision within the Parish.</p>
<p><b>Objective 12 - Wealth:</b> To ensure high and stable levels of employment and address disparities in employment opportunities in the Parish so residents can benefit from economic growth</p>	<p>Policy 14 seeks to facilitate the enhancement of small scale businesses, set out criteria for the support of business development more generally, and seek to resist the loss of any land currently in business or employment use. Policy 15 supports superfast broadband networks to serve the Parish, including to facilitate working from home.</p> <p>It is considered that the Neighbourhood Plan will positively contribute to maintaining and enhancing employment opportunity and provision within the Parish.</p>

5.11. Overall, it is considered that the Cowfold Neighbourhood Plan will have positive effects on environmental, social and economic indicators, and will promote sustainable development. It is not considered the Neighbourhood Plan will have significant detrimental effects, including secondary or indirect effects, cumulative effects, or synergistic effects.

## 6. NEXT STEPS

- 6.1. This SA will be consulted on alongside the consultation Regulation 14 Pre-Submission CNP for a minimum period of six weeks.
- 6.2. This SA process is an iterative process. Further options and feedback arising from the consultation process will be considered and addressed through the SA process during the next stage of its production.
- 6.3. The information within this SA has been taken into account in preparing the Regulation 14, Pre-submission CNP. This SA and any subsequent changes will be taken into account in all subsequent stages of drafting the CNP.
- 6.4. Once adopted, the effects of implementing the CNP are to be monitored to assess any impacts, including unforeseen adverse impacts. This will need to allow for remedial action to take place. On this basis, each sustainability objective is accompanied by a range of practical indicators. These are to be used to assess the achievement of the policies against the 12 sustainability objectives.

**APPENDIX 1**  
**(Cowfold Neighbourhood Plan Housing Site**  
**Appraisal)**



Sites	Objective 1: Conserve/ Enhance Rural Character	Objective 2: Protect/ Enhance Biodiversity	Objective 3: Protect/ Enhance Heritage Assets	Objective 4: Flooding	Objective 5: Air Quality	Objective 6: Transport & Highway Safety	Objective 7: Housing Need & Affordable Housing	Objective 8: Crime	Objective 9: Improve Non-Car Modes of Transport	Objective 10: Maintain/ Enhance Community Infrastructure	Objective 11: Maintain/ Enhance Economic Base	Objective 12: Stable Employment/ Address Disparities
CNP01	✘	✘	0	0	✘	0	✓✓	0	✓	?✓	0	0
CNP02	✘✘	✘	0	0	✘	0	✓✓	0	✓	?✓	0	0
CNP03	✘	✘	✘	0	✘	0	✓✓	0	✓	✓	0	0
CNP04	✘✘	✘	0	0	✘✘	0	✓✓	0	✘	?✓	0	0
CNP05	✘	✘	0	✘	?✘	0	✓	0	✓	0	0	0
CNP06	✘✘	?✘	✘	0	✘	✘	✓✓	0	✓	?✓	0	0
CNP07	✘	✘	0	0	?✘	✘	✓	0	✓	?✓	0	0
CNP08	✘	✘	?✘	0	✘	0	✓✓	0	✓	?✓	0	0
CNP09	✘	?✘	0	0	?✘	✘	✓	0	✓	?✓	0	0
✓✓	significant positive impact on the sustainability objectives.											
✓	positive impact on the sustainability objective.											
?✓	possible positive or slight positive impact on the sustainability objectives.											
0	No impact or neutral impact of sustainability objectives.											
?✘	possible negative or slight negative impact on the sustainability objectives.											
✘	negative impact on the sustainability objective.											
✘✘	significant negative impact on the sustainability objectives.											







CNP04 - Dragons Lane												
Site	Objective 1: Conserve/ Enhance Rural Character	Objective 2: Protect/ Enhance Biodiversity	Objective 3: Protect/ Enhance Heritage Assets	Objective 4: Flooding	Objective 5: Air Quality	Objective 6: Transport & Highway Safety	Objective 7: Housing Need & Affordable Housing	Objective 8: Crime	Objective 9: Improve Non-Car Modes of Transport	Objective 10: Maintain/ Enhance Community Infrastructure	Objective 11: Maintain/ Enhance Economic Base	Objective 12: Stable Employment/ Address Disparities
CNP04	XX	X	0	0	XX	0	✓✓	0	X	?✓	0	0

The site currently comprises agricultural grassland. The site bound on all sides by trees and hedging. A residential dwelling and farm buildings lie to the south.

There are no biodiversity designations on the site. The site is designated as Woodland Priority Habitat Network with Low Spatial Priority. The south eastern boundary of the site abuts woodland which is is designated as Priority Habitat.

There are no Listed Buildings within close proximity of the site. The Cowfold Conservation area lies within 500m of the northern site boundary.

The site falls within Primarily Flood Zone 1. Part of the northern boundary lies within Flood Zone 2.

The site is within 1km of the Cowfold Air Quality Management Area.

The site could be accessed off the A281.

The site offers reasonable access to the services and facilities in Cowfold.

Mitigation measures in conjunction with development could include the retention of mature trees and hedges. Sustainable drainage techniques could be provided on site to ensure surface water is managed effectively.

The Neighbourhood Plan Working Group consider due to to the constraints of the site, it is therefore estimated that 6.7 hectares of the 7 hectares of the site would be available for development at a low density and could therefore deliver 50-70 residential units. Part of the site is proposed as a wildlife area which would be available for educational use.

✓✓	significant positive impact on the sustainability objectives.
✓	positive impact on the sustainability objective.
?✓	possible positive or slight positive impact on the sustainability objectives.
0	No impact or neutral impact of sustainability objectives.
?X	possible negative or slight negative impact on the sustainability objectives.
X	negative impact on the sustainability objective.
XX	significant negative impact on the sustainability objectives.

CNP05 - Cowfold Lodge												
Site	Objective 1: Conserve/ Enhance Rural Character	Objective 2: Protect/ Enhance Biodiversity	Objective 3: Protect/ Enhance Heritage Assets	Objective 4: Flooding	Objective 5: Air Quality	Objective 6: Transport & Highway Safety	Objective 7: Housing Need & Affordable Housing	Objective 8: Crime	Objective 9: Improve Non-Car Modes of Transport	Objective 10: Maintain/ Enhance Community Infrastructure	Objective 11: Maintain/ Enhance Economic Base	Objective 12: Stable Employment/ Address Disparities
CNP05	✘	✘	0	✘	?✘	0	✓	0	✓	0	0	0

The site currently comprises agricultural grassland. The site is bound on all sides by trees/hedging. Bridge Garage abuts the site to the north.

There are no biodiversity designations on the site. Part of the southern area of the site is designated as Woodland Priority Habitat Network with Low Spatial Priority.

Two Listed Buildings lie within 80m to the north west. The Cowfold Conservation area lies within 500m of the northern site boundary.

The site falls within Flood Zone 2.

The site is within 500m of the Cowfold Air Quality Management Area.

The site could be accessed off the A281.

The site is in reasonable proximity to the services and facilities in Cowfold.

Mitigation measures in conjunction with development could include the retention of mature trees and hedges. Sustainable drainage techniques could be provided on site to ensure surface water is managed effectively. To mitigate the removal of existing hedgerow to facilitate visibility splays additional planting and landscaping could be provided

The Neighbourhood Plan Working Group consider 0.48 hectares would be available for development at a low density and could therefore deliver 9 residential units.

✓✓	significant positive impact on the sustainability objectives.
✓	positive impact on the sustainability objective.
?✓	possible positive or slight positive impact on the sustainability objectives.
0	No impact or neutral impact of sustainability objectives.
?✘	possible negative or slight negative impact on the sustainability objectives.
✘	negative impact on the sustainability objective.
✘✘	significant negative impact on the sustainability objectives.





CNP07 - Eastlands Lane												
Site	Objective 1: Conserve/ Enhance Rural Character	Objective 2: Protect/ Enhance Biodiversity	Objective 3: Protect/ Enhance Heritage Assets	Objective 4: Flooding	Objective 5: Air Quality	Objective 6: Transport & Highway Safety	Objective 7: A Housing Need & Affordable Housing	Objective 8: Crime	Objective 9: Improve Non-Car Modes of Transport	Objective 10: Maintain/ Enhance Community Infrastructure	Objective 11: Maintain/ Enhance Economic Base	Objective 12: Stable Employment/ Address Disparities
CNP07	✘	✘	0	0	?✘	✘	✓	0	✓	?✓	0	0

The site currently comprises agricultural land with some existing buildings in site. The site is bound on all sides but trees/hedging. Residential dwellings lie to the west and north. An existing sewerage works lies to the east.

There are no biodiversity designations on the site. The south eastern part of the site is designated as Woodland Priority Habitat Network Low Spatial Priority.

There are no Listed Buildings within close proximity of the site. The Cowfold Conservation area lies within 500m of the northern site boundary.

The site falls within Flood Zone 1.

The site is within 500m of the Cowfold Air Quality Management Area.

The site could be accessed off Eastlands Lane.

The site is in reasonable proximity to the services and facilities in Cowfold.

Mitigation measures in conjunction with development could include the retention of mature trees and hedges. Sustainable drainage techniques could be provided on site to ensure surface water is managed effectively. To mitigate the removal of existing hedgerow to facilitate visibility splays additional planting and landscaping could be provided.

The Neighbourhood Plan Working Group consider 0.6 hectares would be available for development at a low density and could therefore deliver 9 residential units. Scheme proponents have indicated some 2 hectares of land could be gifted to the community together with improved pedestrian access to the village centre.

✓✓	significant positive impact on the sustainability objectives.
✓	positive impact on the sustainability objective.
?✓	possible positive or slight positive impact on the sustainability objectives.
0	No impact or neutral impact of sustainability objectives.
?✘	possible negative or slight negative impact on the sustainability objectives.
✘	negative impact on the sustainability objective.
✘✘	significant negative impact on the sustainability objectives.





## **APPENDIX 2**

**(Cowfold Neighbourhood Plan Policy & Aim  
Appraisal)**

## Cowfold Neighbourhood Plan - Policies and Aims Appraisal

Policy/Aim	Objective 1: Conserve/ Enhance Rural Character	Objective 2: Protect/ Enhance Biodiversity	Objective 3: Protect/ Enhance Heritage Assets	Objective 4: Flooding	Objective 5: Air Quality	Objective 6: Transport & Highway Safety	Objective 7: Affordable Housing	Objective 8: Crime	Objective 9: Improve Non-Car Modes of Transport	Objective 10: Maintain/ Enhance Community Infrastructure	Objective 11: Maintain/ Enhance Economic Base	Objective 12: Stable Employment/ Address Disparities	
Aim 1 - Air Quality Management	0	✓	0	0	✓✓	✓	0	0	?✓	0	0	0	
Aim 2 - Sustainable Development	0	0	0	?✓	✓✓	0	0	0	✓	0	0	0	
Aim 3 - Village Amenities	✓	0	?✓	0	0	0	0	?✓	✓	✓✓	0	0	
Aim 4 - Light Pollution	✓✓	?✓	0	0	0	✓	0	0	✓	0	0	0	
Policy 1 - Groundwater & Surface Water Flood Risk	✓	✓	0	✓✓	0	0	0	0	0	0	0	0	
Policy 2 - Green Infrastructure	✓	✓	0	✓	0	0	?✗	0	✓	✓	0	0	
Policy 3 - Protection of Local Green Spaces	✓✓	✓✓	?✓	0	0	0	0	0	0	✓	0	0	
Aim 5 - Heritage Assets	✓✓	?✓	✓✓	0	0	0	0	0	0	0	0	0	
Policy 4 - Conservation Area	✓✓	0	✓✓	0	0	0	?✗	0	0	?✗	?✗	?✗	
Policy 5 - Open Space	0	✓✓	0	0	0	0	?✗	0	0	✓✓	0	0	
Policy 6 - Community Services and Facilities	0	0	0	0	0	0	0	0	?✓	✓✓	?✓	?✓	
Aim 6 - Medical Facilities	0	0	0	0	0	0	0	0	0	✓✓	?✓	?✓	
Aim 7 - School Provision	0	0	0	0	0	0	✗	0	0	✓✓	0	0	
Policy 7 - Young People	0	0	0	0	0	0	0	0	0	✓✓	0	0	
Aim 8 - Vehicle Charging	0	?✓	0	0	✓✓	0	0	0	0	✓✓	0	0	
Policy 8 - Potters Allotments	?✗	0	?✗	0	0	0	0	0	0	✓✓	0	0	
Aim 9 - Community Infrastructure Levy	0	0	0	0	✓✓	✓✓	0	0	✓✓	✓	0	0	
Housing Need	✗	✗	?✗	0	0	0	✓✓	0	0	0	?✓	?✓	
Policy 9 - Residential Development Principles	✓✓	0	✓	0	0	0	✓	✓	0	0	0	0	
Policy 10 - Windfall Housing	✓	?✓	0	0	?✓	0	✓✓	0	?✓	0	0	0	
Policy 13 - Housing Mix	0	0	0	0	0	0	✓✓	0	0	0	0	0	
Aim 10 - Affordable Housing	0	0	0	0	0	0	✓✓	0	0	0	0	0	
Aim 11 - Retirement Accommodation	?✗	0	0	0	0	0	✓✓	0	0	0	0	0	
Policy 14 - Employment	✓	0	✓	0	0	✓	✓	0	0	0	✓	✓	
Policy 15 - Communications	✓	0	✓	0	?✓	0	0	0	0	0	✓	✓	
Aim 12 - Traffic Management	?✗	0	?✗	0	?✓	✓✓	0	0	✓	0	0	0	
Aim 13 - Road Safety	?✗	0	?✗	0	?✓	✓✓	0	0	✓	0	0	0	
Aim 14 - Sustainable Transport	0	0	0	0	✓	✓	0	0	✓✓	✓	0	0	
Aim 15 - Pedestrian and Cycling Environment	?✗	0	?✗	0	✓	✓✓	0	0	✓✓	✓	0	0	
Policy 16 - Car Parking Provision	?✓	0	0	0	?✓	✓	0	0	0	0	0	0	
Aim 16 - Quiet Lanes	✓	0	0	0	✓	✓✓	0	0	✓✓	0	?✗	?✗	
✓✓	significant positive impact on the sustainability objectives.							?✗	possible negative or slight negative impact on the sustainability ob				
✓	positive impact on the sustainability objective.							✗	negative impact on the sustainability objective.				
?✓	possible positive or slight positive impact on the sustainability objectives.							✗✗	significant negative impact on the sustainability objectives.				
0	No impact or neutral impact of sustainability objectives.												









































Housing Need	Objective 1: Conserve/ Enhance Rural Character	Objective 2: Protect/ Enhance Biodiversity	Objective 3: Protect/ Enhance Heritage Assets	Objective 4: Flooding	Objective 5: Air Quality	Objective 6: Transport & Highway Safety	Objective 7: Affordable Housing	Objective 8: Crime	Objective 9: Improve Non-Car Modes of Transport	Objective 10: Maintain/ Enhance Community Infrastructure	Objective 11: Maintain/ Enhance Economic Base	Objective 12: Stable Employment/ Address Disparities
A	?x	?x	?x	0	0	0	✓	0	0	0	0	0
B	?x	?x	?x	0	0	0	✓	0	0	0	0	0
C	x	x	?x	0	0	0	✓✓	0	0	0	?✓	?✓
D	xx	xx	?x	0	0	0	✓✓	0	0	0	?✓	?✓

**Option A:** To identify the housing need for the Parish at 29 dwellings based on a proportionate share of the HDPF policy requirement of “at least 1,500” dwellings with adjustment for Cowfold’s place in the District’s “Settlement Hierarchy”.

**Option B:** To identify the housing need for the Parish at 40-44 dwellings based on a proportionate share of the HDPF policy requirement of “at least 1,500” dwellings.

**Option C:** To identify the housing need for the Parish at circa 70 dwellings based on a fair share of the SHMA Appraisal of need in the District, and demographic projections, with adjustment for Cowfold’s place in the District’s “Settlement Hierarchy”.

**Option D:** To identify the housing need for the Parish at 137 based on demographic household formation projections.

**Appraisal:** All Options would facilitate the delivery of new housing within the Parish. This would be likely to have a negative impact on those objectives which seek to conserve and protect the rural character of the Parish, biodiversity, and potentially heritage assets. The extent is likely to correlate to the overall quantum of housing envisaged under each Option; the negative impact increasing commensurately with the number of houses.

Conversely, the impact of the number of new homes would be likely to have an increasing positive effect on social objectives. Option A and B would be most limited, whilst Options C and D would be most likely to score positively against the objective to secure housing.

Options C and D could also have a positive effect on economic objectives through increased house building.

In considering the overall effect on the objectives of the sustainability framework, it is considered that Option C is most favourable. It would secure positives in delivering new housing, whilst limiting the impact on environmental objectives.

Appraisal of the individual effects of candidate housing sites on the objectives is considered separately.

**Preferred Policy Option: C**





























