

Bramber Parish Council

Bramber Neighbourhood Plan

**Sustainability Appraisal Scoping Report incorporating
Strategic Environmental Assessment –**

Final Scoping Report

AND

Habitats Regulation Assessment –

Screening Opinion conclusion

August 2019

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1 INTRODUCTION

Sustainability Appraisal incorporating the Strategic Environmental Assessment

- 1.1 This report represents the Sustainability Appraisal Scoping Report which incorporates the Strategic Environmental Assessment (SEA) of the emerging Bramber Neighbourhood Plan. It is for consultation with the relevant statutory authorities and other interested stakeholders.
- 1.2 SEA is a requirement of the EC Directive 2001/42/EC on the assessment of the impacts of certain plans and programmes on the environment. It is implemented in England through the 'Environmental Assessment of Plans and Programmes Regulations 2004'.
- 1.3 The objective of the 'SEA Directive' is:

'To provide for a high level of protection to the environment and to contribute to the integration of environmental considerations into the preparation and adoption of the plans...with a view to promoting sustainable development' (Article 1, Appendix 1)
- 1.4 The requirement for an SEA emerges from Schedule 10, paragraph 8(2)(f) of the Localism Act which states that a draft Neighbourhood Development Order (or Plan) "meets the basic conditions if the making of the order does not breach, and is otherwise compatible with, EU obligations". In this case, the relevant EU obligations are represented by the SEA Directive.
- 1.5 This SEA is in accordance with Strategic Environmental Assessment (SEA) Regulations.
- 1.6 The report was subject to a five week consultation with relevant bodies from 26 June 2019 to 31 July 2019 and the Scoping Report has been amended to take account of feedback received.

Habitats Regulation Assessment

- 1.7 This report also represents a screening of the need for a Habitats Regulations Assessment (HRA) under Directive 92/43/EEC, also known as the Habitats Directive¹.
- 1.8 HRA is the a two-stage process to consider whether a proposed development plan or programme is likely to have significant effects on a European site designated for its nature conservation interest. First, plans or programmes must be screened to determine if they are likely to have a significant effect (and are not plans connected to the management of the European site(s) in question). If it cannot be demonstrated during at the screening stage that the plan or programme will not have significant effects of the European site(s), an 'Appropriate Assessment' (AA) must then be undertaken, which is a much more detailed study of the effects of the plan or programme. The two parts together form a full HRA.
- 1.9 In determining whether a proposed development plan or programme is likely to have significant effects, the local authority must incorporate the 'precautionary principle' into its decision. This means that if there is uncertainty as to whether the plan or programme would cause significant effects on a European site, the full AA would be required.
- 1.10 This report provides a screening opinion on the need for an HRA in respect of the Bramber Neighbourhood Plan.

¹ Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>.

Bramber Neighbourhood Plan

- 1.11 The Bramber Neighbourhood Plan area is shown in Figure 1.1 and is contiguous with the parish boundary.

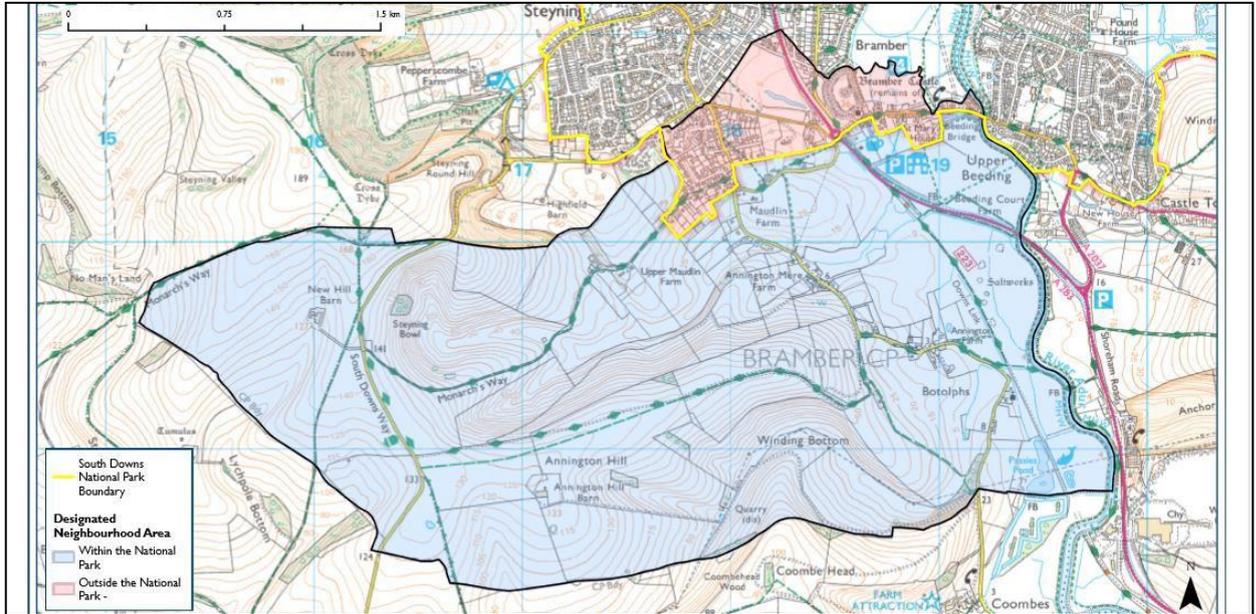


Figure 1.1: Bramber Neighbourhood Plan designated area

- 1.12 The Neighbourhood Plan has been produced by local residents, with the support of Bramber Parish Council although an independent Neighbourhood Plan Steering Group has driven the Plan forward. The Plan provides a vision for the development of the town and parish up to 2031:

“The rural parish of Bramber will have retained its own recognisable character, with the quality of the landscape spaces within and surrounding it continuing to define its identity.

Bramber’s role as a small village and place to visit will have evolved to continue to meet the needs of local residents, but without compromising the special character that makes The Street so unique, including the built heritage, the Conservation Area and listed buildings.

Community facilities (e.g. Bramber Castle, Bramber Brooks) will remain a focal points for the community and they will, where possible, be improved to become more attractive to both residents and visitors alike; the parish council will have expanded its role in the management of such facilities, along with their open spaces and natural assets.

The neighbourhood plan will have further enabled strong, positive and supportive working relationships that exist with neighbouring parishes, local schools, the Steyning Health Centre and local businesses. These will all continue to contribute to the vitality of the area, making a greater range of facilities available to the parish, and contributing to a shared sense of community pride in Bramber.

Bramber will continue to support local employment and businesses. Its sustainable tourism offer will have grown, making a positive contribution to the local economy and employment. This will be supported by a plan developed in partnership with the South Downs National

Park to protect the shared rural setting of Bramber and make improvements to connectivity, green infrastructure and heritage assets.

Accessibility to and connectivity between facilities, amenities, green space and recreational areas, both within Bramber and with neighbouring settlements, will have been improved. This will include maintaining and expanding, where necessary, the existing network of footpaths, bridleways, and cycle routes, thus encouraging more people to find more sustainable ways to access local facilities rather than using their cars, helping to cut down on congestion and pollution.

There will have been a modest growth in housing numbers across the parish through the provision of new homes, designed to meet local needs including elderly downsizers and those starting out on the housing ladder, including families. This will help to provide a balance of dwelling types to serve the community over the long term, enabling those connected with Bramber to live here if they wish while also encouraging new residents. New homes will have been provided in areas that do not detract from the character and setting of the parish and will, where possible, encourage sustainable living”.

1.13 To deliver the vision, the Plan sets out to meet nine objectives:

Objective 1: Protect the rural character of the parish, the qualities of its landscape setting and its biodiversity, managing the impacts of any future growth.

Objective 2: Carefully manage the siting of development to protect the individual identity and setting of Bramber.

Objective 3: Ensure that development is sustainable and sympathetic to the scale, landscape setting, topography and architectural and historic character of where it is sited in the parish.

Objective 4: Plan for some additional housing to meet predominantly local housing needs, bearing in mind changing demographics, to provide a more balanced housing mix, in particular for local affordability and elderly downsizers.

Objective 5: Address local transport issues, including car and parking issues, but predominantly promoting sustainable transport options by improving connectivity to facilities within and beyond the parish by integrating and, where possible, extending the existing network of paths to provide safe pedestrian, cycle and horse riding routes.

Objective 6: Promote opportunities for sustainable tourism, particularly where it enables increased public accessibility to and enjoyment of the national park for recreation and leisure.

Objective 7: Safeguard local green spaces that are valued by the community, improve their biodiversity and make integrate them with the footpath and bridleway network.

Objective 8: Support existing businesses operating in the parish and provide opportunities for new ones where this can be achieved sustainably.

Objective 9: Retain and, where possible, expand the range of facilities and amenities available for local residents.

1.14 The Neighbourhood Plan is considering whether to allocate one site for housing. This has yet to be decided. The site is shown in Figure 1.2, and is known as Clays Field. This is currently a privately owned field, with one public right of way crossing it, although the landowner allows access across the whole piece. The development site would comprise approximately 25% of the entire field. The developer proposes approximately 40 dwellings for the site, however there are concerns about the environmental and social impacts of this quantum of development, including due to the role the field plays in managing coalescence between the settlements of Bramber and Steyning.

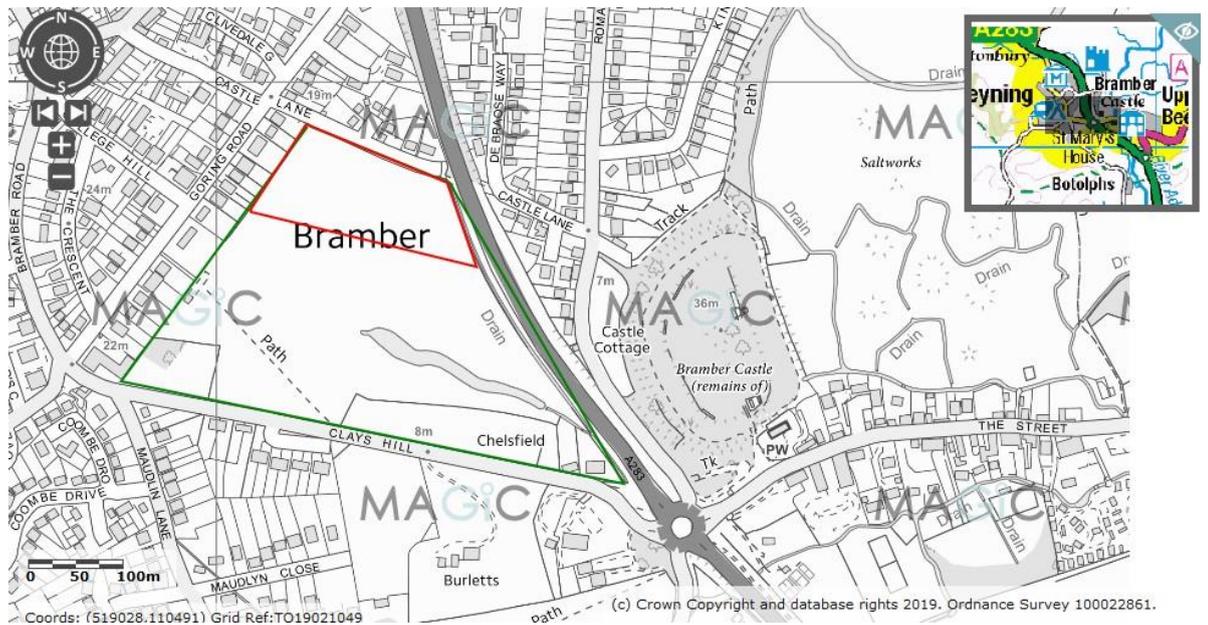


Figure 1.2: Potential site for allocation (perimeter of field shown in green and approximate perimeter of site shown in red) (Source: Magic Map)

Part One

Sustainability Appraisal Scoping Report incorporating Strategic Environmental Assessment

Scoping Report

2 SUSTAINABILITY APPRAISAL SCOPING REPORT INCORPORATING STRATEGIC ENVIRONMENTAL ASSESSMENT

The Scoping Report

- 2.1 This Scoping Report has been developed in accordance with government guidance for undertaking SEA in compliance with the SEA Directive.
- 2.2 According to the guidance, the complete process has five stages resulting in the Environmental Report, which should be implemented in turn. Each stage comprises a number of subsidiary tasks, some of which should be implemented alongside each other and lead to the development of a specific output. The Scoping Report is the first stage of the SEA of the Bramber Neighbourhood Plan associated with it. Stage A explains the process used in this Scoping Report and is presented below in Table 2.1. While the table may infer a sequential process, in practice, stages A1 to A4 inform each other, e.g. one has to have an understanding of the environmental issues (A3) to assess the relevant plans, programmes (A1) and requirements for baseline data collection (A2).
- 2.3 Consultation on the scope of the SEA is required under the SEA Directive and the Scoping Report guidance detailed above. It is a requirement that the Scoping Report is sent to three statutory Consultation Bodies with environmental responsibilities, as listed:
- The Environment Agency
 - Historic England
 - Natural England
- 2.4 The consultation duly undertaken with these bodies sought to:
- ensure the methodology for the proposed SEA/SA is comprehensive to support the Bramber Neighbourhood Plan;
 - provide an opinion on the suitability of the SEA/SA objectives;
 - advise on the key sustainability issues as far as they relate to SEA/SA; and
 - provide advice to ensure the baseline data is appropriate and sufficient.

Table 2.1: Work Requirements for the Scoping Report

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope			
Sub-Stage		Tasks	Key Outputs
A1	Identify links to other relevant plans, programmes and sustainability objectives	Defines how the plan is affected by outside factors and suggests ideas for how any constraints can be addressed	Assessment of requirements of SEA/ Collection and evaluation of key datasets
A2	Collect baseline/ environmental data	Provision of an evidence base for sustainability issues, effects prediction and monitoring	
A3	Identify sustainability issues/problems	Used to focus the SEA and streamline the subsequent phases, including baseline information analysis, setting of the SEA Framework, prediction of effects and monitoring	Assessment of requirements of SEA
A4	Developing the SEA framework	A process to enable the sustainability of plan to be appraised	SEA/SA framework consisting of Sustainability Objectives (Table 5.1) based upon National, Regional and Local issues.
A5	Consulting on the scope of the SEA	Carried out with statutory bodies and other relevant organisations with social, environmental or economic responsibilities to ensure the appraisal covers the key sustainability issues	Revisions to Sustainability framework

2.5 Consultation was duly undertaken on the draft Scoping Report over a five-week period from 25 June 2019 to 31 July 2019 and responses were forthcoming from Historic England, Natural England and the Environment Agency. These are summarised in Table 2 and copies of the responses are provided in Appendix A. Comments were also received from the South Downs National Park Authority and these are included in Table 2.2.

Table 2.2: Responses from statutory bodies on the draft Scoping Report

Statutory body and response	How response has been dealt with
<p>Historic England: One area we note that does not appear to be covered at present is undesignated archaeological remains. The West Sussex Historic Environment Record (HER) is the main repository of data on the previously identified areas of archaeological remains in Bramber and should be noted as a source of data in the baseline. Using the Heritage Gateway website we can see that there are 87 records on the HER relating to Bramber Parish.</p>	<ul style="list-style-type: none"> - Reference made to the West Sussex HER in the Relevant Plans and Programmes section and within the Baseline Data. - Site assessment criteria amended to make reference to undesignated archaeological remains.
<p>Environment Agency: The Environment Agency is a statutory</p>	- No amendments required

<p>consultee for Strategic Environmental Assessments and provides advice to Local Planning Authorities on the scope and finding of the SEA. We have reviewed your Scoping Report and are pleased to see that issues within our remit have been included within our specific objectives, notably flood risk and water quality</p>	
<p>Natural England: It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.</p>	<p>- No amendments required</p>
<p>South Downs National Park Authority:</p> <ul style="list-style-type: none"> - Reference should be made the Partnership Management Plan (PMP). The PMP is an overarching strategy for the management of the South Downs National Park - Reference should also be made here to the South Downs Integrated Landscape Assessment (SDILCA) - Baseline data – reference should be made to the SDILCA within ‘Landscape’. More explicit reference should be made to climate change. - Sustainability Appraisal: <ul style="list-style-type: none"> • ENV2 – recommend this objective is more explicit in seeking a net gain in biodiversity in line with national and SDLP policy. • ENV3 – recommend this objective seeks to protect landscape <u>character</u>. 	<ul style="list-style-type: none"> - The PMP has been included in the Relevant Plans and Programmes section. - This report has been included in the Relevant Plans and Programmes section - Baseline data amended to reference the SDILCA relating to Bramber and surrounds. - Air and climate topic has been widened to incorporate climate change. - Objectives have been amended to reflect recommendations.

2.6 Each of the Neighbourhood Plan objectives is presented in Table 2.3 below and is assessed against the strategic objectives of the Emerging South Downs Local Plan and the Horsham District Planning Framework to establish whether there are any conflicts.

Table 2.3: Objectives of the Bramber Neighbourhood Plan compared to the strategic objectives of the Emerging South Downs Local Plan and the Horsham District Planning Framework

Neighbourhood Plan Objectives	Emerging South Downs Local Plan Objectives	Horsham District Planning Framework Objectives
<p>Protect the rural character of the parish, the qualities of its landscape setting and its biodiversity, managing the impacts of any future growth.</p>	<p>To conserve and enhance the landscapes of the National Park.</p> <p>To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape.</p> <p>To achieve a sustainable use of ecosystem services thus enhancing natural capital across the landscapes of the National Park and contributing to wealth and human health and wellbeing.</p> <p>To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.</p>	<p>Ensure that future development in the district is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and delivers living, working and balanced communities which contribute to community cohesion.</p> <p>To locate new development in sustainable locations that respect environmental capacity, and which have appropriate infrastructure, services and facilities in place, or where these can realistically be provided; and to encourage the appropriate re-use of brownfield sites in sustainable locations.</p> <p>To safeguard and enhance the environmental quality of the district, ensuring that development maximises opportunities for biodiversity and minimises the impact on environmental quality including air, soil, water quality and the risk of flooding.</p>
<p>Carefully manage the siting of development to protect the individual identity and setting of Bramber.</p>	<p>To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.</p>	<p>To safeguard and enhance the character and built heritage of the district's settlements and ensure that the distinct and separate character of settlements, are retained and, where possible, enhanced and amenity is protected.</p> <p>To recognise and promote the role of Horsham Town as the primary focus for the community and businesses in the district whilst preserving</p>

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Neighbourhood Plan Objectives	Emerging South Downs Local Plan Objectives	Horsham District Planning Framework Objectives
		<p>the unique ambiance that contributes to its attractiveness. The smaller market towns will be recognised as secondary hubs and encouraged to achieve their role in meeting local needs and acting as a focus for a range of activities, including employment, retail, leisure and recreation.</p> <p>Ensure that future development in the district is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and delivers living, working and balanced communities which contribute to community cohesion.</p>
<p>Ensure that development is sustainable and sympathetic to the scale, landscape setting, topography and architectural and historic character of where it is sited in the parish.</p>	<p>To conserve and enhance the cultural heritage of the National Park.</p> <p>To conserve and enhance the landscapes of the National Park.</p> <p>To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.</p>	<p>Ensure that future development in the district is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and delivers living, working and balanced communities which contribute to community cohesion.</p> <p>Identify and preserve the unique landscape character and the contribution that this makes to the setting of rural villages and towns and ensure that new development minimises the impact on the countryside.</p> <p>To safeguard and enhance the character and built heritage of the district's settlements and</p>

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Neighbourhood Plan Objectives	Emerging South Downs Local Plan Objectives	Horsham District Planning Framework Objectives
		ensure that the distinct and separate character of settlements, are retained and, where possible, enhanced and amenity is protected.
Plan for some additional housing to meet predominantly local housing needs, bearing in mind changing demographics, to provide a more balanced housing mix, in particular for local affordability and elderly downsizers.	<p>To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.</p> <p>To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.</p>	<p>Provide a range of housing developments across the district that: delivers the target number of new homes; respects the scale of existing places; and so far as is possible caters for the needs of all residents, including the delivery of a range of housing sizes and types including affordable housing.</p> <p>To protect and promote the economic viability and vitality of Horsham town, the smaller market towns and the rural centres and promote development which is appropriate within the existing hierarchy and diversity of settlements in the district.</p> <p>Ensure that future development in the district is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and delivers living, working and balanced communities which contribute to community cohesion.</p>
Address local transport issues, including car and parking issues, but predominantly promoting sustainable transport options by improving connectivity to facilities within and beyond the parish by integrating and, where possible, extending the existing network of paths to provide safe pedestrian, cycle and horse-riding routes.	To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.	To promote a living and working rural economy where employment opportunities exist which reduce the need for residents to travel, including reducing commuting distances, and facilitate and promote innovation in business including such as high-speed broadband.

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Neighbourhood Plan Objectives	Emerging South Downs Local Plan Objectives	Horsham District Planning Framework Objectives
		<p>To protect, enhance and, where appropriate, secure the provision of additional accessible community services, facilities, open spaces and infrastructure throughout the district in accordance with local and district needs.</p> <p>Ensure that new development minimises carbon emissions, adapts to the likely changes in the future climate and promotes the supply of renewable, low carbon and decentralised energy.</p>
<p>Promote opportunities for sustainable tourism, particularly where it enables increased public accessibility to and enjoyment of the national park for recreation and leisure.</p>	<p>To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.</p> <p>To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.</p>	<p>To promote a living and working rural economy where employment opportunities exist which reduce the need for residents to travel, including reducing commuting distances, and facilitate and promote innovation in business including such as high-speed broadband.</p> <p>Ensure that future development in the district is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and delivers living, working and balanced communities which contribute to community cohesion.</p>
<p>Safeguard local green spaces that are valued by the community, improve their biodiversity and make integrate them with the footpath and bridleway network.</p>	<p>To conserve and enhance the landscapes of the National Park.</p>	<p>To safeguard and enhance the environmental quality of the district, ensuring that development maximises opportunities for biodiversity and minimises the impact on</p>

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Neighbourhood Plan Objectives	Emerging South Downs Local Plan Objectives	Horsham District Planning Framework Objectives
	<p>To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape.</p>	<p>environmental quality including air, soil, water quality and the risk of flooding.</p> <p>Identify and preserve the unique landscape character and the contribution that this makes to the setting of rural villages and towns and ensure that new development minimises the impact on the countryside.</p>
<p>Support existing businesses operating in the parish and provide opportunities for new ones where this can be achieved sustainably.</p>	<p>To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.</p> <p>To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.</p> <p>To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.</p>	<p>Ensure that future development in the district is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and delivers living, working and balanced communities which contribute to community cohesion.</p> <p>To meet employment needs, create opportunities to foster economic growth and regeneration, and maintain high employment levels in the district which help reduce commuting distances.</p> <p>To promote a living and working rural economy where employment opportunities exist which reduce the need for residents to travel, including reducing commuting distances, and facilitate and promote innovation in business including such as high speed broadband.</p>
<p>Retain and, where possible, expand the range of facilities and amenities available for local residents.</p>	<p>To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.</p>	<p>To protect, enhance and, where appropriate, secure the provision of additional accessible community services, facilities, open spaces</p>

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Neighbourhood Plan Objectives	Emerging South Downs Local Plan Objectives	Horsham District Planning Framework Objectives
	<p>To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.</p> <p>To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.</p>	<p>and infrastructure throughout the district in accordance with local and district needs.</p> <p>To recognise and promote the role of Horsham Town as the primary focus for the community and businesses in the district whilst preserving the unique ambiance that contributes to its attractiveness. The smaller market towns will be recognised as secondary hubs, and encouraged to achieve their role in meeting local needs and acting as a focus for a range of activities, including employment, retail, leisure and recreation.</p>

2.7 The assessment in Figure 2.3 is also relevant information informing Stage A1 of the SA Scoping process.

Approach to engagement

2.8 It is recognised that the approach to engagement is vital to a successful plan. The community of Bramber parish – including its residents and businesses – must be able to properly input into the ongoing process of developing the vision and objectives, considering options and then establishing the preferred set of options that make up the draft Neighbourhood Plan.

2.9 Prior to Bramber developing its own Neighbourhood Plan, in the summer of 2014, the parish had commenced work on a Neighbourhood Plan in partnership with the neighbouring parishes of Steyning, Wiston and Ashurst. A Steering Group was formed in Sept/Oct 2014 comprising representatives from each of the parishes. Following this, six Focus Groups, involving over 70 volunteers, who were all local residents, were established to explore the various Plan themes. An extensive programme of engagement activities was undertaken, which ensured that the community had the opportunity to input into the emerging work at every stage. This included:

- Hundreds of hours of volunteer time dedicated to giving local residents increased control over future local land use, including 25 meetings of the Steering Group and numerous focus group meetings (e.g. Housing – 16 meetings).
- Public survey issued in January 2015, and 844 responses received. Responses provided a basis for a broad understanding the range of opinions and suggestions at the outset of the project.
- Vision statement produced January 2015.
- Youth survey issued by Steyning Grammar School pupils in July 2015. Of nearly 300 responses, 96 were received from young people in the SWAB parishes. This data was analysed & forwarded to the SWAB Team.
- Call for sites issued in spring 2015 and Local Green Spaces survey.
- A Stage One report produced in October 2015.
- An informal public consultation exercise held over two weekends in January 2016 on the proposed sites and local open spaces. Over 700 residents attended.
- From Spring 2016 the key focus of the work was primarily to prepare the content and policies for the ‘Pre-submission Document’ (the draft NP)

2.10 In October 2017, the parish councils took the decision to move forward separately on individual Neighbourhood Plans. This was as a result of the changing requirements and evolving legislation for neighbourhood planning, which resulted in the need for each individual parish to review and re-evaluate its role within the parish cluster. After careful consideration, Bramber took the decision to continue with a Neighbourhood Plan that would cover just the area of Bramber Parish. They applied to designate the area and this was formalised on February 15th 2018. A Steering Group was established comprising local councillors and residents, and Focus Groups were set up to explore individual themes.

2.11 The extensive engagement work undertaken by the original cluster of parishes was not lost and the Bramber Steering Group was able to review and retain the data and information of relevance to the parish. In addition, further engagement activity has been undertaken to inform the development of the emerging Neighbourhood Plan, including:

- The establishment of a Bramber Neighbourhood Plan website (<https://www.bramber.org.uk/neighbourhood-plan>) as a central hub for information.
- Using local newsletters, newspapers, fliers and posters to notify people of upcoming events.
- Delivering a launch drop in event to reinvigorate the process.
- Running engagement events, both as drop-in events and specific workshops.
- Developing a vision and objectives in partnership with the local community.
- Undertaking a new Local Call for Sites.
- Commissioning a Housing Needs Assessment for the parish.
- Regularly engaging with key stakeholders, including landowners.
- Producing a regular newsletter to inform people of activities and progress.
- Development of display material on each of the topic areas.
- Reporting back on the outcomes of key activities so that the community is able to understand the progress being made.

2.12 All policies and site allocations will be consulted on with the community and, subject to the assessments undertaken in the SEA, ultimately it is the community's views which will shape the decisions made on the final wording of policies and the sites that are allocated, demonstrating that reasonable alternatives have been taken into consideration. In doing so, it is vital that the community understands that the Neighbourhood Plan must comply with the Basic Conditions and therefore there are certain factors which need to be taken into consideration when given their views on policies and sites. The Neighbourhood Plan team is using consultant support to advise on the best approach which ensures that the community is fully informed when being asked to engage on a particular matter and shape its outcome.

3 RELEVANT PLANS, PROGRAMMES AND SUSTAINABILITY OBJECTIVES (STAGE A1)

3.1. This section provides a summary review of the policy context relevant for the Neighbourhood Plan. Starting at the international level and working down in scale this covers the key policies that the Neighbourhood Plan should adhere to or consider. While it is common sense to ensure the Plan and SEA/SA reviews these requirements, it is also a requirement of the SEA Directive which states that the Environmental Report should include:

“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes”

“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation”

[Annex 1(a) and (e) of the SEA Directive]

3.2. Within this context it is stated in the NPPF that work for Neighbourhood Planning is proportionate with the scale and ambitions of the plan. We have therefore considered a range of relevant policies and plans for this assessment considering international, national, regional (South east of England), and local (County and District) plans and policies.

International context

Key objectives	Key targets/indicators	Key implications for NP and SEA
EU Habitats and Conservation of Wild Birds Directives (92/43/EEC and 79/409/EEC)		
To conserve fauna and flora and natural habitats of EU importance by the establishment of a network of protected areas throughout the European Community. This was designed to maintain both the distribution and abundance of threatened species and habitats.	Identifies endangered habitats and species requiring protection and need for re-establishment of denuded biotopes. Protected areas should be created, maintained and managed.	Plans should take account relevant SPA and SAC sites. If negative impacts are anticipated appropriate assessments should be undertaken. Above protecting the integrity and interest of European sites, the NP should consider objectives to protect and if possible, enhance biodiversity.
EU Water Framework Directive (2000/60/EC)		
To expand the scope of water protection to all waters, surface waters and groundwater. <ul style="list-style-type: none"> Achieve ‘good status’ for all waters by 2015. Water management should be based on river basins and a ‘combined approach’ 	Prevent deterioration in the status of aquatic ecosystems, provide protection and improve ecological condition: <ul style="list-style-type: none"> achieve at least good status for all water bodies by 2015 (or later subject to specific criteria). 	Plan should consider any significant hydrological / hydrogeological factors and ensure integration with existing catchment management plans. Plan should consider including objectives to protect and enhance water resources, quality and ecological function.

Key objectives	Key targets/indicators	Key implications for NP and SEA
<p>of emission limit values and quality standards.</p> <ul style="list-style-type: none"> Water management should include the closer involvement of community. 	<ul style="list-style-type: none"> meet the requirements of WFD protected areas promote sustainable use of water conserve habitats and species that depend directly on water progressively reduce or phase out pollutants that pose significant threats to the aquatic environment / groundwater help mitigate the impacts of floods and droughts. 	
EU Air Quality Directive (2008/50/EC)		
<p>Establishes limit values and alert thresholds for concentrations of key pollutants in ambient air including sulphur dioxide, nitrogen dioxide / oxides of nitrogen, particulates. Maintain ambient air quality in areas where it is good and improve it in others.</p>	<p>Sets limit values and alert thresholds for concentrations of sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead.</p>	<p>Plan should consider (where relevant) the levels of sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air. Plan should consider maintaining ambient air quality and including objectives with the aim of reducing air pollution and, where possible, enhancing air quality in respect of key pollutants.</p>

National and regional context

- 3.3. In this section we summarise the most relevant regional and local plans and policies making the assumption that these include the relevant international and national sustainability objectives.
- 3.4. The Planning system is undergoing a period of change following the introduction of the Localism Act 2011 and the National Planning Policy Framework (NPPF) in 2012 (most recently updated in February 2019).
- 3.5. This has heralded significant changes including to the planning system and provides a greater emphasis on localism. European Regulations still apply as does much of the legacy planning guidance – until it is revised for the NPPF.
- 3.6. The NPPF stresses the importance of sustainability underpinning plans and policies.

Key objectives	Key targets/indicators	Key implications for NP and SEA
National Planning Policy Framework (as amended February 2019)		
<p>Planning should drive and support sustainable economic development. It should:</p>	<p>Supports local and national targets with regard to biodiversity and geodiversity.</p>	<p>Plan should contribute to the objective of achieving sustainable</p>

Key objectives	Key targets/indicators	Key implications for NP and SEA
<ul style="list-style-type: none"> • secure high quality design and good standard of amenity • take account of the different roles of areas, recognising the intrinsic character and beauty of the countryside • support transition to a low carbon future in a changing climate, taking account of flood risk and encourage the reuse of existing resources and encouraging the use of renewable resources. • contribute to conserving and enhancing the natural environment and reducing pollution. • encourage the effective use of land by reusing land that has been previously developed. • conserve heritage assets in a manner appropriate to their significance. • focus significant development in locations which are, or can be made sustainable. <p>Paragraph 185: “...plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.’</p> <p>Paragraph 193: “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’</p>		<p>development (social, economic and environmental). SA Objectives should reflect the core planning principles and policies set out in the NPPF. The Plan should:</p> <ul style="list-style-type: none"> • contribute to minimising impacts and providing net gains in biodiversity where possible • contribute to the Government’s commitment to halt the overall decline in biodiversity – including by establishing coherent ecological networks that are more resilient to current and future pressures. <p>Plan should contribute to the conservation, and where appropriate, enhancement of the historic environment.</p> <p>The Plan should ensure that development does not have a detrimental impact on any heritage assets and should seek to ensure that development actively conserves the asset.</p>
1990 Town and Country Planning Act		
<p>Section 66: Requires special regard for the desirability of preserving listed buildings and their settings.</p> <p>Section 72: Special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.</p>		<p>The NP must ensure that the listed buildings and their settings are not affected by proposed development.</p> <p>The NP should consider policies to preserve and enhance the character of conservation areas.</p>
The Waste (England & Wales) Regulations 2011		

Key objectives	Key targets/indicators	Key implications for NP and SEA
<p>To encourage/ensure waste arises/is dealt with further up the waste hierarchy. Divert waste disposal away from landfill.</p>	<p>Target of 50% of household waste to be recycled.</p>	<p>Plan must have regard to the amended waste hierarchy. Policies and objectives should where possible encourage waste to be re-used, recycled or have value / energy recovery. If possible the Plan should discourage landfilling of waste.</p>
UK Climate Change Act 2008		
<p>The Act introduced a statutory target for reducing carbon emissions.</p>	<p>Target of reducing carbon emissions by 80 per cent below 1990 levels by 2050, with an interim target of 34% by 2020.</p>	<p>Planning can make a contribution to mitigating and adapting to climate change by influencing the location, scale and character of development. The plan should include policies / objectives that contribute towards achieving lower carbon emissions and greater resilience to the impacts of climate change.</p>
The Natural Environment White Paper (The Natural Choice) 2011		
<p>Mainstreaming the value of nature across society by:</p> <ul style="list-style-type: none"> • facilitating greater local action to protect and improve nature; • creating 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; • strengthening the connections between people and nature to the benefit of both; and • showing leadership in the European Union and internationally, to protect and enhance natural assets globally. 	<p>The process identifies the need to develop a set of key indicators to track progress</p>	<p>The Plan should consider how it can best contribute towards highlighting the value of nature and ensuring that it is protected.</p>

Key objectives	Key targets/indicators	Key implications for NP and SEA
Flood and Water Management Act 2010		
<p>Improve the management of flood risk for people, homes and businesses. To protect water supplies.</p>	<p>Local Authorities to prepare flood risk assessments, flood maps and plans. EA to prepare Local flood risk management strategies.</p>	<p>Plan should take account of flooding and water management issues and strategies and consider the inclusion of policies / objectives to reduce flood risks and other impacts on the water environment.</p>
Carbon Plan: Delivering our low carbon future 2011		
<p>Government-wide plan for action on climate change at domestic and international levels.</p>	<p>Includes a range of sector-based plans and targets for low carbon:</p> <ul style="list-style-type: none"> • building • transport • industry • electricity • agriculture, land use, forestry and waste 	<p>The Plan should include policies / objectives that contribute towards achieving lower carbon emissions.</p>
Mainstreaming sustainable development 2011		
<p>This refreshed vision builds upon the principles that underpinned the UK's 2005 SD strategy, recognising the needs of the economy, society and the natural environment, alongside the use of good governance and sound science.</p>	<p>Promises a new set of indicators from DEFRA that link initiatives and include wellbeing.</p>	<p>Plan should take account of climate change and promote sustainability through sustainable, low carbon and green economic growth.</p>
The Natural Environment White Paper (The Natural Choice) 2011		
<p>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. These outcomes will be delivered through action in four areas:</p> <ul style="list-style-type: none"> • a more integrated large-scale approach to conservation on land and at sea • putting people at the heart of biodiversity policy • reducing environmental pressures • improving knowledge 	<p>A series of priority actions have been identified to deliver the four identified actions.</p>	<p>The Plan should consider how it can best contribute towards protecting and enhancing ecological networks.</p>

Key objectives	Key targets/indicators	Key implications for NP and SEA
The South East Biodiversity Strategy (South East England Biodiversity Forum) 2009		
Provides a coherent vision to safeguard and enhance the regions biodiversity and wildlife. Embed a landscape scale approach to restoring whole ecosystems in the working practices and policies of all partners. Create the space needed for wildlife to respond to climate change. Enable all organisations in the East of England to support and improve biodiversity.	Provides a framework for the delivery of biodiversity targets through biodiversity opportunity areas and habitat and species targets.	The NP should consider objectives to protect and where possible, enhance biodiversity.
South East River Basin Management Plan		
Prepared under the Water Framework Directive, the plan is about the pressures facing the water environment in the Anglian River Basin District and the actions that will address them.	By 2015, 18% of surface waters (rivers, lakes, estuaries and coastal waters) are going to improve for at least one biological, chemical or physical element. By 2015, 23% of surface waters will be at good or better ecological status/ potential and 33% of groundwater bodies will be at good status. In combination 23% of all water bodies will be at good status by 2015. At least 47% of assessed surface waters will be at good or better biological status by 2015.	The NP needs to consider the impact of proposed development on water quality.

County/local context

- 3.7. West Sussex County Council prepares statutory land use plans for waste and minerals policy and non-statutory guidance on Landscape Character Assessment. While the Structure Plan for the period 2001-2016 no longer has formal status, the County Council state that it still provides ‘the strategic context for our view on land use and transport.’
- 3.8. In April 2014, West Sussex County Council and the South Downs National Park Authority adopted a Waste Local Plan which covers the period to 2031 and is the most up-to-date statement of the Authorities’ land-use planning policy for waste. A key element of the plan is the aspiration to become a zero-waste-to-landfill county and the vision for the Plan is to ensure that communities, the environment, economy and special character of West Sussex are protected.
- 3.9. Both Horsham District Council and the South Down National Park Authority have produced reports that relate to the wider area and these are noted here.

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
West Sussex Transport Plan 2011-2026		
<p>To improve quality of life for the people of West Sussex via four key strategies to maintain, manage and invest in transport:</p> <ul style="list-style-type: none"> • promoting economic growth • tackling climate change • providing access to services, employment & housing • improving safety, security & health 	<p>Indicators include: congestion, mode of travel to work and school, cycling trips, accessibility, road traffic accidents, road and footway maintenance, street lighting, highway structures, road flooding, air quality and transport emissions.</p>	<p>The Plan should consider policies / objectives which contribute to transport sustainability. This should go beyond reducing carbon emissions to include economic growth, safety, pollution, traffic reduction and access to services.</p>
West Sussex Waste Local Plan 2014		
<p>To facilitate a continuing decline in the reliance on disposal to land and the aspiration is that there will be 'zero waste to landfill' by 2031.</p>	<p>To only make provision for a declining amount of landfill over the plan period with 'zero waste to landfill' by 2026.</p>	<p>The Plan should consider how, within the context of a growing population in Bramber, waste generation can be minimised and it can be ensured that Bramber contributes towards the target of zero waste to landfill.</p>
West Sussex County Council - Building A Sustainable Future: A strategy for delivering the corporate priority 2012		
<p>This Strategy focuses on four key priority areas that address the main challenges facing West Sussex County Council. The four priorities for action are:</p> <ul style="list-style-type: none"> • reduce carbon emissions • adapt to a changing climate • use resources efficiently and effectively • make sustainability business as usual. 	<p>The Strategy contains information about why these areas are a challenge to the County and sets out actions and 'clear and challenging targets against each priority'.</p>	<p>Plan should consider including objectives / policies to support reductions in carbon emissions, and consider adaptation to a changing climate and the efficient use of resources.</p>
Sustainable Community Strategy for West Sussex 2008 -2020		
<p>Cross cutting strategy aiming to:</p> <ul style="list-style-type: none"> • relieve the pressures on the road network • explore opportunities for renewable energy • integrate water resource requirements in new development • reduce carbon footprint • improve waste management to reduce waste generation and increase recycling. • make best use of innovation and new technology to reduce harmful emissions • improve access for all to the natural and historic environment and a range of sporting, leisure, cultural and arts activities. 	<p>No specific targets.</p>	<p>The Plan should consider including policies/objectives that help meet the key objectives.</p>
Sussex Biodiversity Action Plan		

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
<p>Maintain and, where practicable, enhance the wildlife and habitats that provide the natural character and diversity of Sussex</p> <ul style="list-style-type: none"> • Identify priority habitats and species in Sussex • Set realistic and ambitious targets and timescales for priority habitats and species and to monitor progress towards them • Raise public awareness and encourage involvement in biodiversity action. 	<p>Sussex Biodiversity Record Centre inventory statistics for species and habitats e.g.:</p> <ul style="list-style-type: none"> • Rare Species Inventory • Biodiversity Action Plan Species Inventory • Pond Inventory. 	<p>Plan should consider including policies / objectives to: enhance (where possible) the wildlife and habitats that give rise to West Sussex's natural character and diversity.</p>
West Sussex Strategic Flood Risk Assessment (SFRA) 2010		
<p>The main objective of the SFRA is to provide flood information so that an evidence and risk based sequential approach can be made when making planning decisions in line with the NPPF. It also aims to:</p> <ul style="list-style-type: none"> • cover a wide spatial area and look at flood risk today and in the future • support sustainability appraisals of the local development frameworks • identify further investigations that may be required to assess specific development proposals. 	<p>The assessment investigates flood risk issues for specific sites and makes recommendations.</p>	<p>The Plan should take into account the SFRA's sequential testing guidance and should consider inclusion of objectives related to flood risk.</p>
West Sussex Historic Environment Record (last updated September 2018)		
<p>Identifies a summary of known historic assets – including archaeological records - in West Sussex, which can be used to assist in the analysis of the landscape.</p>	<p>The report sets out data that can then be used to understand assets locally.</p>	<p>The Plan should consider implications of policies on heritage assets and archaeological remains.</p>
Horsham Strategic Flood Risk Assessment		
<p>Identifies all areas of flood risk within the district as well as what the level of risk is.</p>	<p>Flood Zone</p>	<p>The Plan needs to ensure that new development avoids areas identified at risk of flooding and that the existing level of flood risk within and outside Bramber is not exacerbated and, where possible, reduced.</p>

South Downs Strategic Flood Risk Assessment		
Identifies all areas of flood risk within the district as well as what the level of risk is.	Flood Zone	The Plan needs to ensure that new development avoids areas identified at risk of flooding and that the existing level of flood risk within and outside Bramber is not exacerbated and, where possible, reduced.
A Strategy for the West Sussex Landscape -West Sussex County Council 2005		
1: ensure high quality new development which contributes to and reinforces landscape character 2: conserve and enhance historic landscape character 3: ensure the maintenance and renewal of the agricultural landscape	No targets	Plan should be consistent with supporting the objectives in the strategy.

Key objectives	Key targets/indicators	Key implications for Neighbourhood Plan and Sustainability Appraisal
<p>4: conserve and enhance semi-natural habitats including securing the future of woodlands, hedgerows and trees as distinctive landscape features</p> <p>5: promote and celebrate the value and variety of the West Sussex landscape.</p>		
Horsham District Landscape Capacity Assessment, 2014		
<p>To identify where development may be carried out without an unacceptable impact on landscape character in general and on the setting of outstanding assets within Mid Sussex.</p>	<p>5-point scale to assess landscape sensitivity and landscape value</p>	<p>Plan should be consistent and take into account assessment of landscape capacity</p>
Sussex Historic Landscape Characterisation –West Sussex County Council and others, 2010		
<p>To identify areas or units of land based on their key historic landscape attributes.</p>		<p>The Plan should ensure that areas of historic landscape character are preserved and enhanced.</p>
Using Less, Living Better -West Sussex Environment and Climate Change Board, 2012		
<p>Helping to reduce emissions by at least 50% by 2025.</p>	<p>None</p>	<p>The Plan should seek to reflect, where possible, the actions proposed and the outcomes that are envisaged.</p>
Horsham District Biodiversity Action Plan, 2003		
<p>To recognise the value of biodiversity and landscape within the District and set out how these assets can be protected and enhanced.</p>	<p>Assesses protected species and valued landscapes</p>	<p>The Plan should ensure that it does not have an unacceptable impact on protected species or valued landscapes.</p>
South Downs Partnership Management Plan, 2020-25		
<p>An overarching strategy for the management of the South Downs National Park.</p>	<p>The Plan sets out 10 management objectives within the headings of 'Enhance', 'Experience' and 'Thrive'. Against each objective is listed the relevant programme that will enable delivery.</p>	<p>The Plan should ensure that it contributes to the overarching objectives of the Partnership Management Plan.</p>
South Downs Integrated Landscape Assessment, 2005 (updated 2011)		
<p>A comprehensive, fully integrated assessment of all aspects of the landscape character of the South Downs, so that greater understanding of this nationally important landscape and its needs and opportunities can lead to improved management and enjoyment</p>	<p>The Plan sets out, for each landscape area, the management and development considerations to take into account.</p>	<p>Landscape areas of relevance to the Bramber Neighbourhood Plan are:</p> <ul style="list-style-type: none"> • Adur Floodplain • Adur Valley Sides • Arun to Adur Open Downs • Arun to Adur Scarp Footslopes <p>The Plan should consider the implications of its policies on the management and development matters for these areas.</p>

District policy context

- 3.10. Bramber is within the Horsham district and the South Downs National Park Authority for planning purposes. The Horsham District Planning Framework (HDPF, 2015) sets strategic policies for land including housing and employment targets, land and location. The South Downs National Park Authority (SDNPA) has recently published its first Local Plan, which replaces all existing planning policies.
- 3.11. The weight given to policies from the plans above will depend upon the degree to which they conform to the National Planning Policy Framework (NPPF) which in the event of any conflict will take precedence.
- 3.12. It should be noted that, at the present time, there are other parishes in close proximity to Bramber that are in the process of preparing neighbourhood plans. As such, there are plans which could potentially have a residual effect on Bramber parish.

4 BASELINE DATA AND KEY SUSTAINABILITY ISSUES (STAGES A2 & A3)

- 4.1. The SEA Regulations require that certain environmental topics are included within the environmental baseline collected to inform the SEA. The topics required by the SEA Regulations are shown in Table 4.1.
- 4.2. The SEA Scoping Report summarises the current state of the environment and also identifies key trends and pressures for the future. The information is categorised under topics, although it must be recognised that many of the topics are interlinked.

Table 4.1: Topics and their relevance to the Bramber Neighbourhood Plan

Topic	Relevance to the Bramber NP
Nature conservation	Potential for new site allocations to impact on the habitats of species within areas of nature conservation value
Landscape	Potential for new site allocations to impact on the landscape
Water	Risk of flooding impacts on where people live and can impact on the economic prosperity of an area. The way in which water is drained off of land, including road and other hard surfaces, can be important to the level of flood risk experienced in an area.
Soils	Potential for site allocations and development to impact on best agricultural soils or important geological sites.
Heritage	Historic environment features can be vulnerable to damage and other impacts from neglect, decay or development pressures.
Air and Climate	Potential for new site allocations to create pollution through additional congestion.
Human characteristics	Potential for the plan to impact on human health, particularly positively through improvements to walking, cycling routes, etc
Roads and transport	Development could impact on congestion on the road network and create pedestrian safety problems, particularly at key junctions in Bramber village centre and wider parish
Infrastructure	Development could have an impact on the infrastructure necessary to keep society running smoothly
Economic characteristics	Development could impact on the ability of communities to function effectively (in their interaction with services) and on the economic prosperity of an area.

- 4.3. The information was compiled from a wide range of information sources. Firstly information came from the draft Neighbourhood Plan and associated work conducted to support it. As part

of the widespread consultation work to support the plan this has included feedback from a range of consultees. There are also a number of key reports relevant to the environment of the area and some of their key findings have been summarised here – they are referenced through the text, as are various data sources used to provide maps and statistics. This section presents topics relevant to the Neighbourhood Plan and while it seeks to be comprehensive only the key issues are included to keep the document manageable.

Nature conservation and biodiversity

- 4.4. The most important conservation designation is the South Downs National Park area, with biodiversity underpinning strategic policy within the national park area. The designated national park area is shown in Figure 4.1.
- 4.5. In addition, there are a number of Biodiversity Action Plan (BAP) Priority Areas across the parish. The two most dominant of these is good quality semi-improved grassland woodland and coastal floodplain and grazing marsh although no individual BAP Priority Area is particularly extensive. This is shown in Figure 4.2.

Figure 4.1: South Downs National Park Area

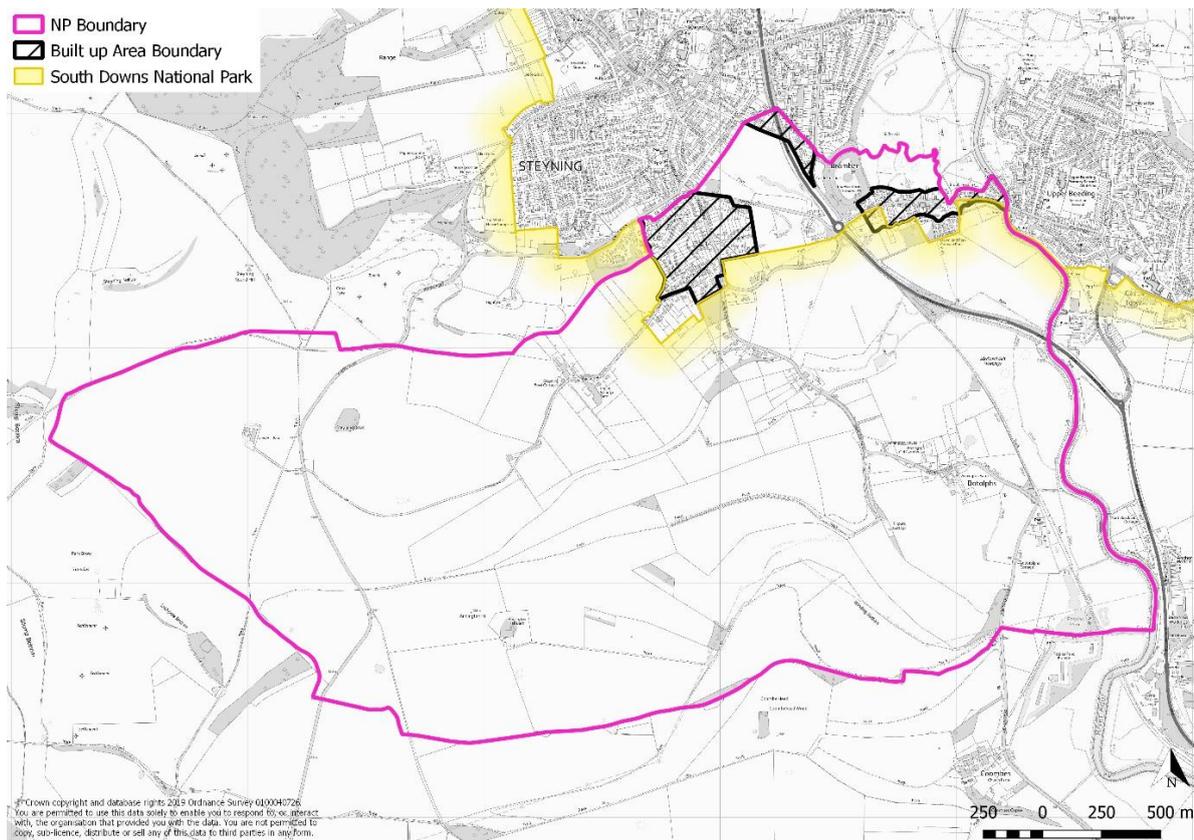
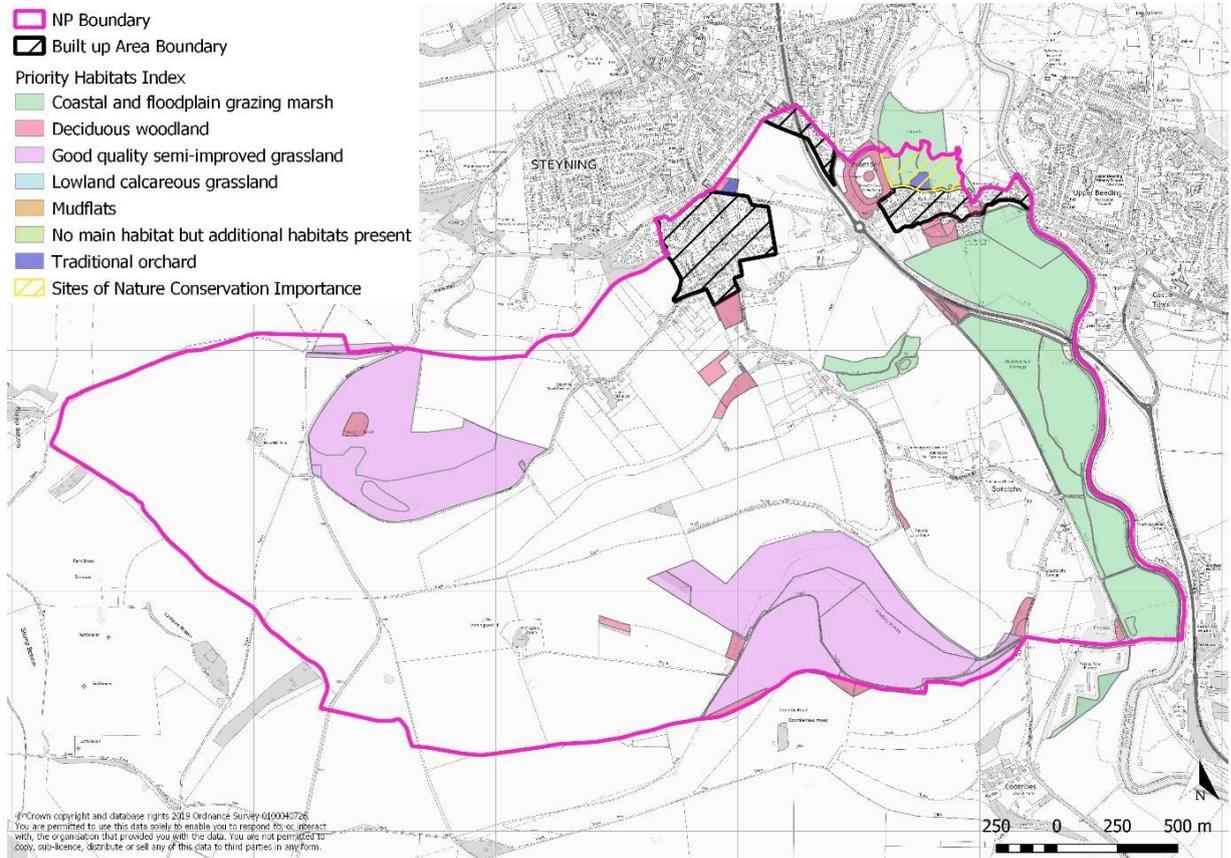


Figure 4.2: Bramber Parish Priority Habitat Areas



Species

4.6. The Sussex Biodiversity Record Centre was commissioned to produce an ecological data search for land at Bramber parish. Figure 4.3 provides a summary of the results.

Figure 4.3: Summary findings of the ecological data search for Bramber (source: Sussex Biodiversity Record Centre)

Summary of results		
Sites and habitats		
Statutory sites	1 National Park	
Non-statutory sites	2 LWS / 1 LGS	
Section 41 habitats	6 habitats	
Ancient and/or ghyll woodland	Present	
Protected and designated species		
International designations	42 species	669 records
National designations	151 species	4,774 records
Other designations	278 species	6,860 records
Total	300 species	7,534 records
Invasive non-native	21 species	95 records

4.7. Information from the Sussex Biodiversity Record Centre shows sightings of 88 distinct BAP species since 2006:

Group	Common Name	Number
Birds	Dunnock	353
Birds	Song Thrush	307
Birds	Starling	279
Birds	Skylark	274
Birds	Herring Gull	251
Birds	Yellowhammer	244
Birds	House Sparrow	224
Birds	Linnet	222
Birds	Reed Bunting	219
Birds	Corn Bunting	198
Birds	Bullfinch	114
Birds	Lapwing	99
Birds	Yellow Wagtail	67
Birds	Grey Partridge	64
Birds	Cuckoo	49
Birds	Marsh Tit	47
Birds	Spotted Flycatcher	39
Birds	Lesser Redpoll	24
Birds	Turtle Dove	17

Birds	Tree Sparrow	13
Birds	Ring Ouzel	12
Birds	Grasshopper Warbler	12
Birds	Bewick's Swan	11
Birds	Lesser Spotted Woodpecker	11
Birds	Tree Pipit	6
Birds	Curlew	6
Birds	Bittern	5
Birds	Hawfinch	1
Higher Plants - Flowering Plants	Shepherd's-needle	3
Higher Plants - Flowering Plants	Red Star-thistle	2
Invertebrates - Beetles	Stag Beetle	31
Invertebrates - Butterflies	Wall	85
Invertebrates - Butterflies	Small Heath	32
Invertebrates - Butterflies	Brown Hairstreak	10
Invertebrates - Butterflies	Small Blue	4
Invertebrates - Butterflies	Small Heath	2
Invertebrates - Butterflies	Dingy Skipper	2
Invertebrates - Moths	Cinnabar	9
Invertebrates - Moths	Dusky Thorn	8
Invertebrates - Moths	Small Emerald	8
Invertebrates - Moths	Mullein Wave	8
Invertebrates - Moths	Rustic	7
Invertebrates - Moths	Pretty Chalk Carpet	7
Invertebrates - Moths	White Ermine	7
Invertebrates - Moths	Buff Ermine	7
Invertebrates - Moths	Hedge Rustic	7
Invertebrates - Moths	Ear Moth	6
Invertebrates - Moths	Garden Tiger	6
Invertebrates - Moths	Dot Moth	6
Invertebrates - Moths	Feathered Gothic	6
Invertebrates - Moths	Green-brindled Crescent	5
Invertebrates - Moths	Deep-brown Dart	5
Invertebrates - Moths	Mottled Rustic	5
Invertebrates - Moths	Small Square-spot	5
Invertebrates - Moths	Blood-vein	5
Invertebrates - Moths	Barred Tooth-striped	5
Invertebrates - Moths	Dusky Brocade	4
Invertebrates - Moths	Ghost Moth	4
Invertebrates - Moths	Shoulder-striped Wainscot	4
Invertebrates - Moths	Lackey	4
Invertebrates - Moths	Powdered Quaker	4
Invertebrates - Moths	Large Wainscot	4
Invertebrates - Moths	Sprawler	3

Invertebrates - Moths	Sallow	3
Invertebrates - Moths	Small Phoenix	3
Invertebrates - Moths	Centre-barred Sallow	2
Invertebrates - Moths	Rosy Rustic	2
Invertebrates - Moths	Brindled Beauty	2
Invertebrates - Moths	Dark Brocade	2
Invertebrates - Moths	Large Nutmeg	1
Invertebrates - Moths	September Thorn	1
Invertebrates - Moths	Galium Carpet	1
Invertebrates - Moths	Spinach	1
Invertebrates - Moths	Rosy Minor	1
Invertebrates - Moths	Chalk Carpet	1
Invertebrates - Moths	Oak Hook-tip	1
Invertebrates - Moths	Grass Rivulet	1
Invertebrates - Moths	Knot Grass	0
Invertebrates - Moths	Beaded Chestnut	0
Mammals - Terrestrial (bats)	Common Pipistrelle	6
Mammals - Terrestrial (bats)	Soprano Pipstrelle (55 kHz)	3
Mammals - Terrestrial (bats)	Noctule Bat	2
Mammals - Terrestrial (bats)	Long-eared sp.	1
Mammals - Terrestrial (bats)	Bat sp.	1
Mammals - Terrestrial (excl. bats)	West European Hedgehog	19
Mammals - Terrestrial (excl. bats)	Brown Hare	6
Mammals - Terrestrial (excl. bats)	Polecat	2
Mammals - Terrestrial (excl. bats)	Feral Ferret	1
Reptiles	Slow-worm	17
Reptiles	Grass Snake	17

Source: Sussex Biodiversity Record Centre

- 4.8. In total there are over 21,000 individual records of all species in Bramber over the period since 2006.

Landscape

4.9. Bramber is a predominantly rural parish. The Landscape Character Assessment published by Horsham District Council² lists the following landscape types within the parish:

- The village itself occupies a causeway and gravel river terrace, slightly elevated above the Adur Valley floodplain.
- The village surroundings are characterised by a wider landscape context of a gap in a chalk escarpment created by the River Adur.

4.10. The South Downs Integrated Landscape Assessment contains information on the following character areas that are relevant to Bramber parish:

- Adur Floodplain
- Adur Valley Sides
- Arun to Adur Open Downs
- Arun to Adur Scarp Footslopes

Specific sensitivities on the scarp footslopes include Bramber Castle, a major landmark on the Adur floodplain. Development considerations specific to the footslopes include minimising the use of excessive lighting, signage and 'suburban' features on the edge of Steyning.

Air and climate change

4.11. There are no air quality management areas (AQMAs) in or close to the parish of Bramber.

4.12. Part of the built up area is within the flood zone of the River Adur, risk of flooding to properties could increase with climate change.

Water

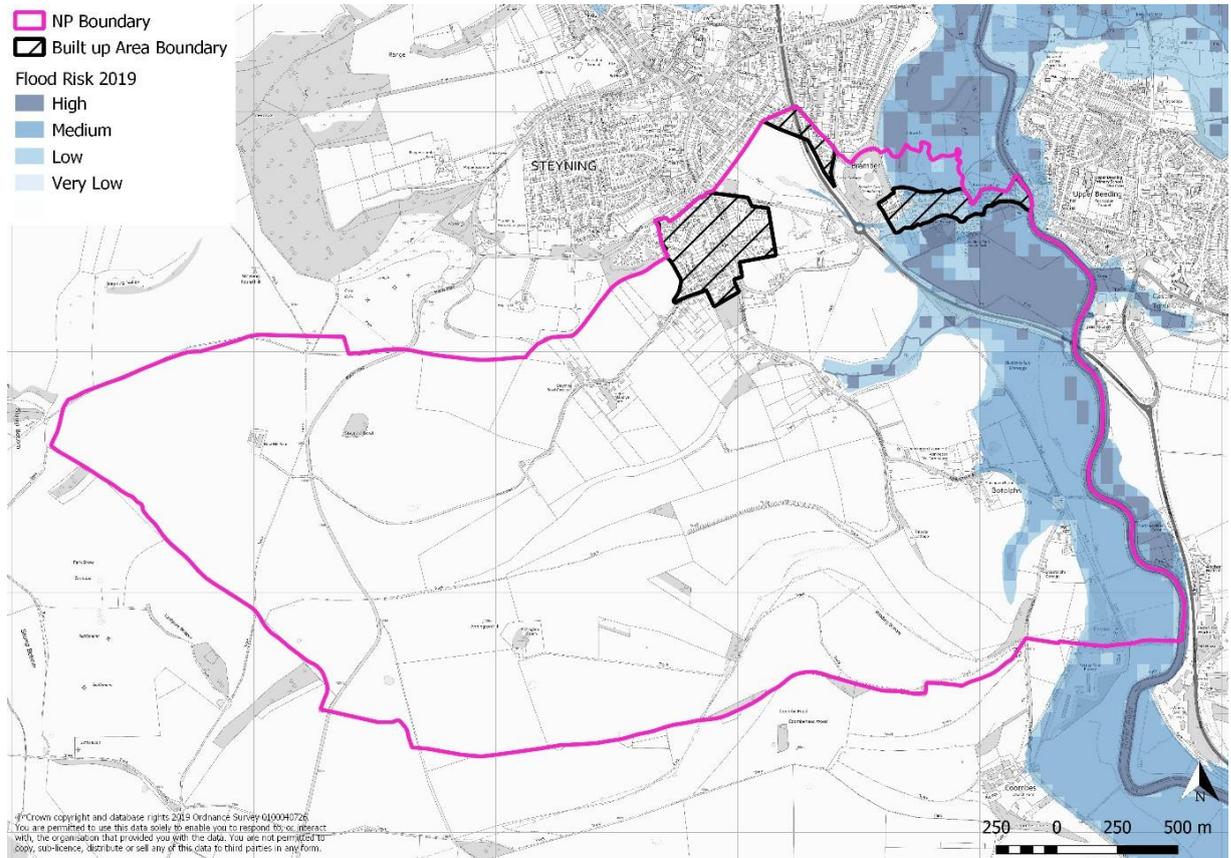
4.13. A large part of the built-up areas of the parish is within the flood catchment of the River Adur. There have been few reported incidences of flooding and the Environment Agency has named the area between Steyning and Upper Beeding in its River Adur Catchment Flood Management Plan³. Those areas covered by the built-up area boundary surrounding Bramber Castle falls into a medium flood risk area.

4.14. This is shown in Figure 4.4 below.

² https://www.horsham.gov.uk/data/assets/pdf_file/0020/31349/Landscape-Character-Assessment-2003.pdf

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293867/Adur_Catchment_Flood_Management_Plan.pdf

Figure 4.4: High flood risk areas



Soil and Geology

- 4.15. The National Soils Map (NSRI 2001⁴) suggests that the two soil types that are present in the parish is lime-rich loamy and clayey soils with impeded drainage dominating the north east of the parish and the areas immediately adjacent to the River Adur, and more freely draining loamy soils throughout the rest of the parish.
- 4.16. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. Published by Natural England⁵, the ALC provides a classification in 5 grades using a number of criteria including climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, micro-relief, flood risk) and soil (depth, structure, texture, chemicals, stoniness). The scales ranges from 1 (high quality) to 5 – poorest.
- 4.17. The NPPF (paragraph 171) states that relevant planning authorities allocate land with the least environmental or amenity value, where consistent with other policies in the Framework. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer

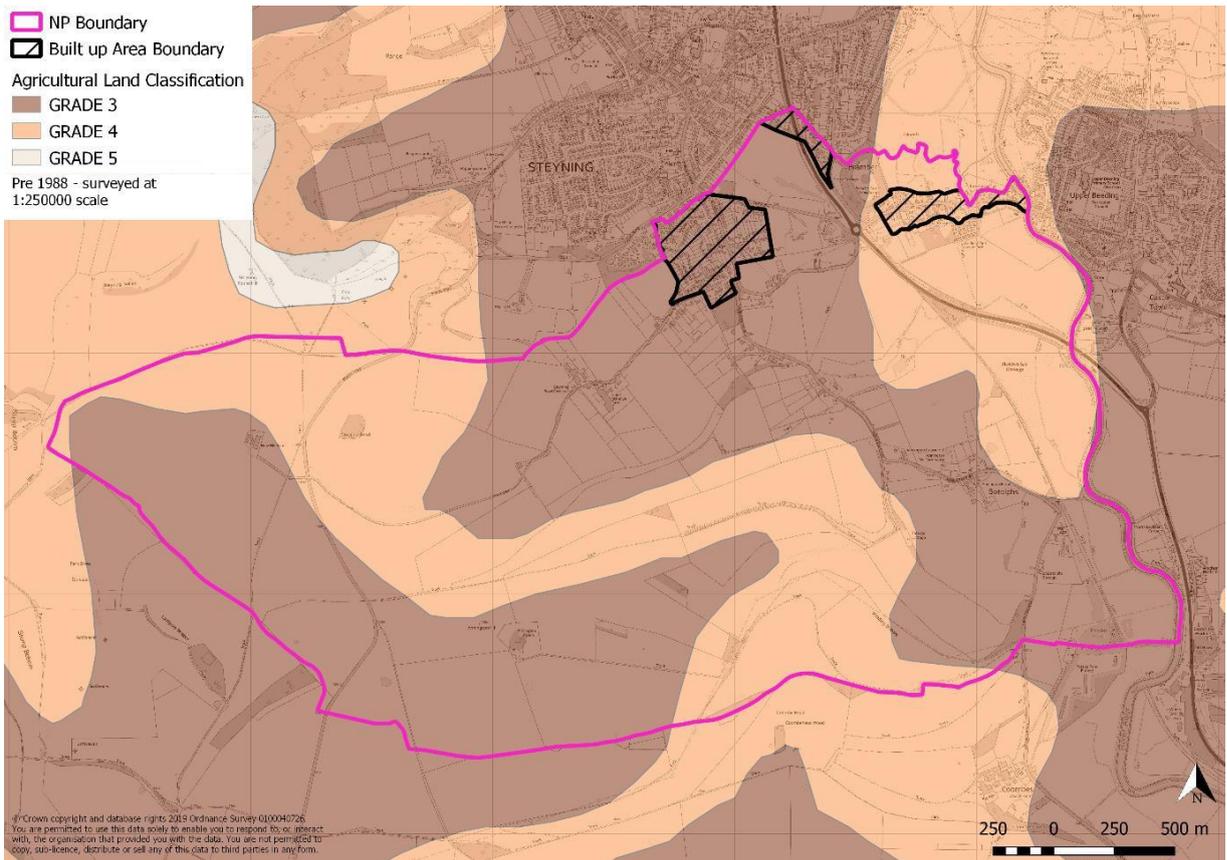
⁴ National Soil Resources Institute (2001). National Soil Map. Cranfield University.

⁵ <http://publications.naturalengland.org.uk/file/4424325>

quality land should be preferred to those of a higher quality. The ALC for Bramber Parish is shown in Figure 4.5 below.

- 4.18. This shows that the majority of agricultural land in the parish is Grade 3 (good to moderate), with some areas Grade 4 (poor).

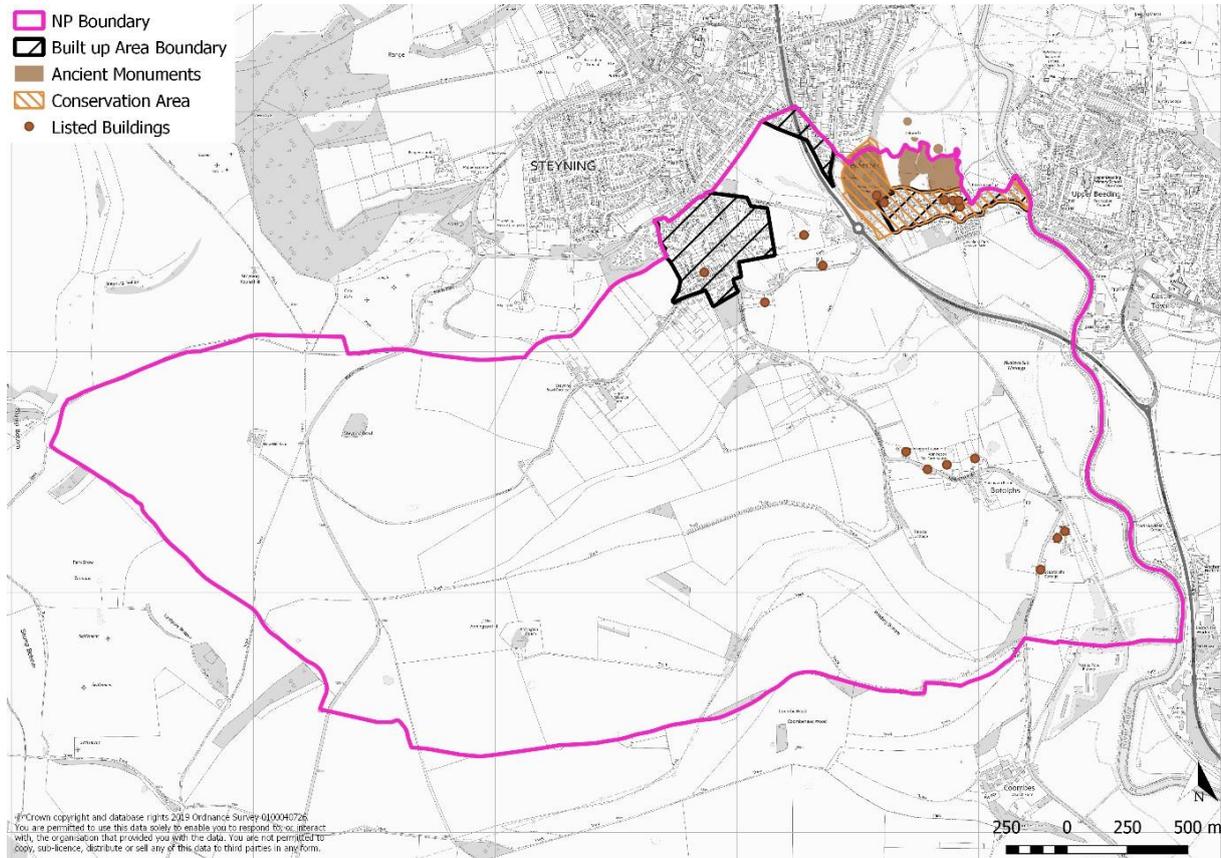
Figure 4.5: Map of agricultural land classification



Heritage

- 4.19. There are two Scheduled Ancient Monuments (SAM) in the parish – Bramber Castle Ruins and the adjacent Salt Workings. This are also Grade I listed buildings.
- 4.20. The parish includes 17 listed buildings, of which 4 are grade I and 13 are grade II. Of this total, 11 are in or near the Bramber settlement area, with the remainder being outside the settlement. This is shown in Figure 4.6.

Figure 4.6: Listed buildings and Conservation Area in Bramber



- 4.21. A portion of the built-up area of Bramber immediately surrounding Bramber Castle, The Street and Bramber Bridge is subject to conservation area status.
- 4.22. The Conservation Area provides a number of excellent examples of local architectural heritage across several centuries which have been well preserved. It contains all the SAM's in the parish. Bramber Castle and its ruins dominates the area.
- 4.23. Bramber is unusual in that today it is of similar scale to the town in its heyday of the late 11th to 13th centuries. The single street on made-up ground, the castle, and the church all date back to the origins of Bramber soon after the Norman Conquest. But this apparent continuity masks centuries of late-medieval and post-medieval decline, so that there are few pre-c.1800 buildings today.
- 4.24. A significant cluster of listed buildings are located in or close to the area comprising The Street and Bramber Bridge. This is close to the Castle and represents the most sensitive heritage location within the town.
- 4.25. In addition to the listed buildings, there are a number of unlisted buildings and structures dotted throughout the town that make a positive contribution towards the built heritage of Bramber. These are identified in the Conservation Area Character Appraisal. This includes a particularly significant concentration of such buildings along The Street including The Tollgate.
- 4.26. The heritage of Bramber is considered to be a significant issue.

Social and economic indicators

- 4.27. The 2011 Census recorded that the population of Bramber parish was 785 persons, living in 338 households. Since 2001, the population has grown by 28 persons, or 4%. Comparatively, the Horsham district population grew by 8%. Over the same period, the number of households grew by 6% in Bramber compared to the 10% increase in the Horsham district. This number will reflect the number of new houses built over the decade and also possibly the sub-division of existing properties into multiple households.
- 4.28. There has been a broad trend in the increase in population and number of households across the wider district, but the rate of increase appears to be marginally lower in Bramber.
- 4.29. Another barrier for access to housing is house prices – both in relative and absolute terms. In May 2019, the average price of a terraced house in the BN44 postcode area (covering Bramber) was
- 4.30. £316,418⁶. Based on a 95% mortgage, a given household would require an income of £99,000⁷, to be able to buy such a property.
- 4.31. Figure 4.7 shows the general health of the population. This shows that Bramber has health outcomes slightly above that of the Horsham district and the national average.

Figure 4.7: General health, 2011

	Bramber parish	Horsham district	England
Very good health	53%	51%	47%
Good health	34%	35%	34%
Fair health	9%	11%	13%
Bad health	2%	3%	4%
Very bad health	1%	1%	1%

Source: 2011 Census

Roads and transport

- 4.32. There are multiple road routes which provide access to Bramber from all surrounding areas. The majority of these roads are two-lane routes (i.e. one lane in each direction) and single track country lanes and are therefore inappropriate for carrying significant volumes of traffic.
- 4.33. The roads in the area reflect its agricultural characteristics and are often very small and therefore inappropriate for carrying anything other than a very low level of local traffic.
- 4.34. Bramber is not served by a train station. There are multiple bus services but these are limited in the service that they provide, particularly to the major service centres including Brighton.

Infrastructure

- 4.35. Bramber has the following community infrastructure assets focused in Bramber town:

⁶ Source: www.home.co.uk

⁷ Source <https://www.which.co.uk/money/mortgages-and-property/mortgages/types-of-mortgage/95-mortgages-a8vny5c1dccv>

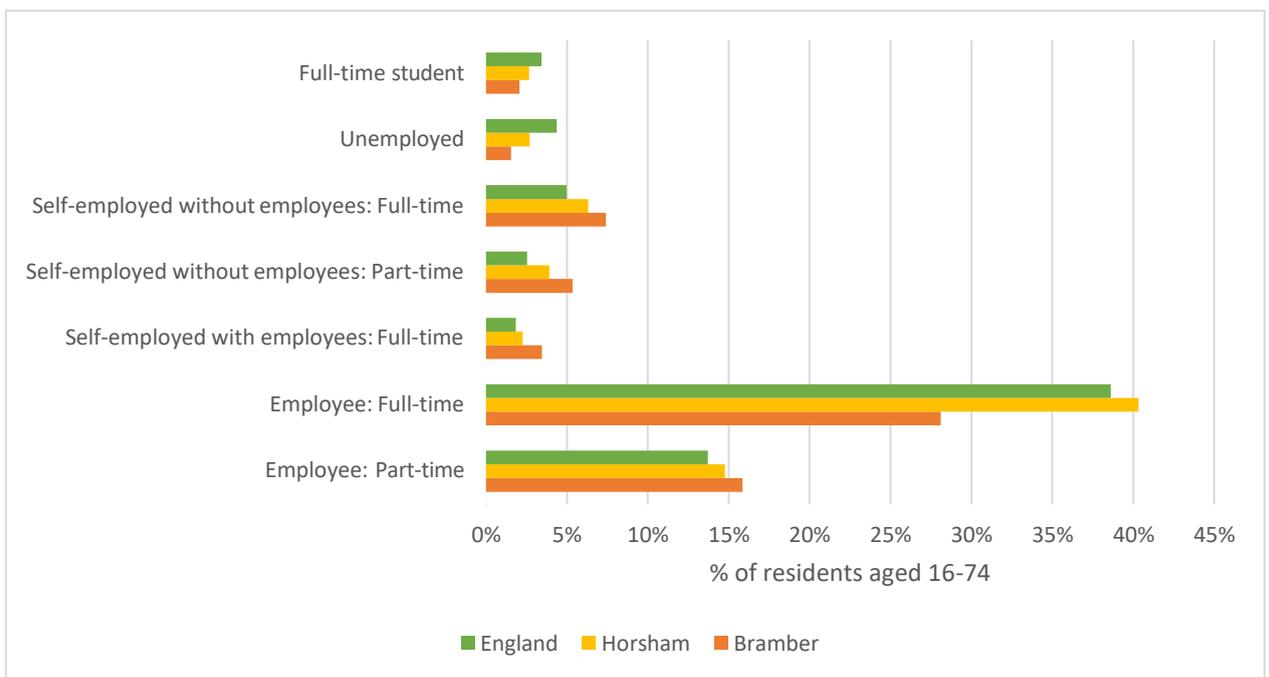
- Two churches
- Bramber Castle ruins and grounds
- Hotel
- Pub/Hotel
- Chinese and Indian restaurants
- St. Mary's House-Mediaeval house open to the public (hosts concerts throughout the year)

Economic characteristics

4.36. Bramber's levels of economic activity are below the district and regional figures, with lower proportions of full time employed persons in the parish. It does have slightly higher levels of self-employed people without employees, suggesting a significant number of people working for themselves.

4.37. This is shown in Figure 4.8.

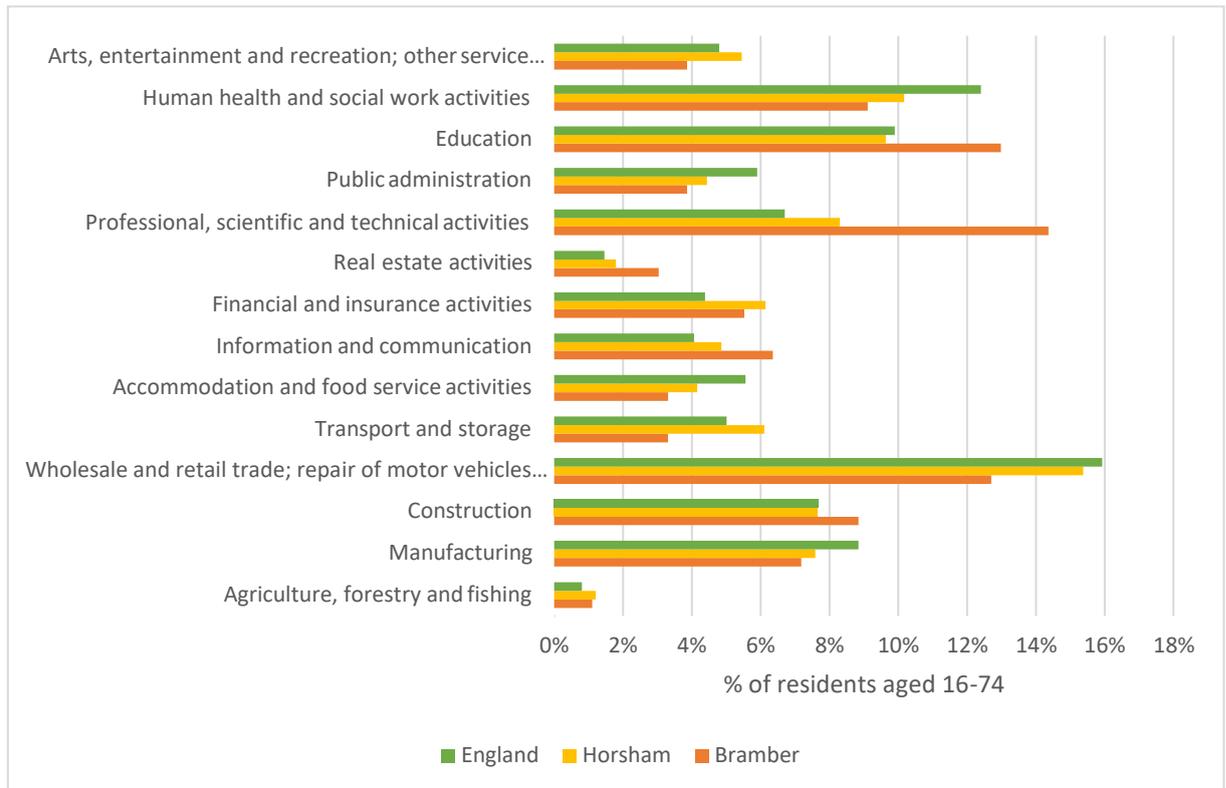
Figure 4.8: Economic activity, 2011



Source: 2011 Census

4.38. In terms of the occupations that residents of the parish hold, Bramber is comparatively strongly represented in the education sector and technical, scientific operations. The other sectors that are well represented are retail and IT services. This is shown in Figure 4.9. Note that in many cases, occupations are undertaken outside the boundary of the parish.

Figure 4.9: Type of industry, 2011



Source: 2011 Census

4.39. Figure 4.10 shows Bramber is a well-educated parish, with a lower proportion of those over 16 with no qualification than the district and national average. Additionally, the proportion that have been educated to Level 4 or above, i.e. degree level, is very high, at 42%.

Figure 4.10: Qualifications of residents aged 16 and over



Source: 2011 Census

5 KEY SUSTAINABILITY ISSUES

SWOT analysis

5.1 Figure 5.1 has been informed by the issues identified in the Neighbourhood Plan engagement events and consultation, and the baseline information collected in Section 3.

Figure 5.1: SWOT analysis of issues facing Bramber parish

Strengths	Weaknesses
<ul style="list-style-type: none"> • High quality historic character of town centre with numerous protected assets (Bramber Castle, church, historic houses, St Mary's House and Gardens and conservation area) • Attractive landscape setting, with much of the parish located within the South Downs National Park • Vibrant High Street for a small village, with modest facilities including two hotels, public house, and restaurants • Range of public rights of way • Strong network of green spaces – including gardens, Bramber Brooks, Bramber Castle both within the village itself and connecting to the South Downs • Attractive views into the village and from the village to the South Downs • Visitor destination • Strong levels of volunteer community support • Fairly well connected on the road network, within easy reach of the A24 and A27 	<ul style="list-style-type: none"> • Housing is expensive (Entry level homes now 22 times local incomes) which limits opportunities for those on more modest budgets to move to the parish. As are result, the population locally is an aging one • Lack of smaller (in terms of numbers of bedrooms) homes for both downsizing and as starter homes/ homes for small families) • Very few developable areas emerging from the Call for Sites • Concerns about air and noise pollution from nearby roads • Parking is generally on-street due to the historic nature of the village, which causes congestion • Some of the footpaths are fairly narrow making it difficult for those wishing to walk within particularly the village – for instance the bridge connecting Bramber to Upper Beeding • Nearest railway station is Shoreham-by-Sea (7 miles away) • Bus service is limited, in particular to Worthing and Brighton • Poor broadband and mobile services in parts of the parish • The bypass cuts through the parish – this fast road creates a bit of a barrier in the

	parish and is difficult for pedestrians to cross safely.
<p style="text-align: center;">Opportunities</p> <ul style="list-style-type: none"> • To support employment opportunities in the village and wider parish • To enhance and extend the visitor offer – both within the village (historic assets) and beyond (natural environment, national park) • To enhance local meeting facilities, such as at the Church • To assess the infrastructure from a whole village and wider parish perspective and ensure it is fit for purpose – in particular for non-car modes of transport • To support locally distinctive design that is inclusive and built to high quality and environmental standards • To provide additional homes tailored to the identified local need in Bramber • To protect areas of green space valued by the local community 	<p style="text-align: center;">Threats</p> <ul style="list-style-type: none"> • Close proximity to neighbouring villages – notably Steyning and Upper Beeding – and the need to retain and protect Bramber’s individual identity • Horsham planning policy to date (HPPF) classifies Bramber along with Upper Beeding within the settlement hierarchy, potentially downgrading its individual identify • Loss of valued green spaces to development • Population profile is skewed towards retired and elderly • Sensitive settings, iconic views and edges/ entrances to the town are threatened • Dominance of road transport causing problems of parking, volume and speed causing safety issues for pedestrians, cyclists and users of mobility scooters • Emerging Horsham planning framework will be subject to uplift in housing numbers and potential knock-on effect on Bramber • Limited scope for development sites in the parish

Key issues

5.2 There are a number of sustainability issues and challenges facing the parish. While Bramber parish offers a high quality environment to residents and local businesses, the Neighbourhood Plan will need to manage and seek to resolve a series of issues over its lifetime if the parish is to continue to be successful while respecting its outstanding landscape setting.

5.3 In the absence of a Neighbourhood Plan (and as a consequence a lack of vision and strategy for Bramber), there will be fewer opportunities to address the issues and challenges facing the parish, as well as contributing to a reduction in the potential benefit to the community.

Figure 5.2: Challenges and impacts of not having a neighbourhood plan

Challenges facing Bramber Parish	Effect of not having a neighbourhood plan
Problem of traffic speed, volume and weight and lack of pedestrian/cyclist safety, notably along the bypass and where pavements are narrow	Residents lives will be further blighted and safety will be worsened by traffic movements
Scale of housing growth	The SDNPA Local Plan does not allocate housing in Bramber. There are no strategic sites allocated for Bramber by HDC. Not having a plan could result in unmet housing need, although there is scope to delegate housing allocations to the district.
Lack of affordable housing for parish residents	No suitable sites for housing for local people would be delivered
Supporting an ageing population	Potential issues of care/support/transport and a lack of local homes suitable for the needs of older people
Inadequate and potentially reducing public transport options	Increased dependence on the private car and increasing isolation for those unable to afford a car, especially in more rural locations
Support and flexibility for local businesses	The needs of businesses to grow and change may be restricted by a lack of policies addressing locally specific issues
Congestion caused by on-street parking	This may be exacerbated without policies to encourage off-street parking provision.
Improvement of tourism offer	Tourism provision is ad hoc and does not make the most of the potential linked to the town centre
Infrastructure improvements such as roads, crossings, parking, community facilities	Funding for infrastructure requirements may not arise and provision of community facilities may not keep up with growing demand
Coalescence with neighbouring settlements	Potential encroachment to nearby settlements if development is unplanned
Loss of agricultural land to development	Could result in unnecessary loss of agricultural land due to unplanned development coming forward through speculative applications
Poor access to services and facilities	Lack of community facilities and hence increased dependence on the private car to access services further afield and inability to do so for those unable to afford a car.
Need to maintain and enhance the high quality natural environment, wildlife networks and biodiversity of the parish	Could result in unnecessary impacts on biodiversity due to unplanned development coming forward through speculative applications
Need to protect and enhance the historic buildings and environment of the parish	Could result in unnecessary impacts on heritage assets due to unplanned development coming forward through speculative applications

6 SUSTAINABILITY APPRAISAL FRAMEWORK (STAGE A4)

6.1 In order to undertake the Sustainability Appraisal process for the Neighbourhood Plan, it is necessary to identify sustainability objectives and indicators to enable an assessment to be made of the emerging options and allow for recommendations and mitigation measures to be proposed. The sustainability objectives have emerged through the following considerations:

- through the review of documents listed in Section 3
- as identified in the baseline section (Section 4)
- to help address sustainability issues known locally
- to help address the ‘weaknesses’ and mitigate the ‘threats’ outlined in the SWOT analysis (Section 5)

6.2 The proposed sustainability objectives and indicators (Sustainability Framework) for the Sustainability Appraisal of the Neighbourhood Plan are as shown in Table 6.1 below:

Table 6.1: Sustainability objectives and criteria for the Bramber Neighbourhood Plan

Sustainability theme	Objectives	Criteria
1/Env	To preserve and enhance the natural beauty of Bramber in terms of its geology, landform, soils, biodiversity, water systems and climate, tranquillity	<ul style="list-style-type: none"> - Change in area of Local Wildlife Sites within the parish - Change in area of ancient/ veteran trees (data from Sussex Biodiversity Record Centre) - Change in area of priority habitats within the parish (data from Sussex Biodiversity Record Centre) - Change in area /grade of agricultural land classification (ALC) land lost. - Number of developments in ‘highly vulnerable’ or ‘more vulnerable’ flood risk areas.
2/Env	To protect, enhance and provide net gain in the biodiversity of the parish, its wildlife habitats and species	<ul style="list-style-type: none"> - Area of habitats within the parish (data from Sussex Biodiversity Record Centre) - Condition of ancient/veteran trees - Number of trees with TPOs. - Length of hedgerows in parish. - Variety of BAP species recorded. - Additional green spaces/ecological networks provided.
3/Env	To protect the landscape character of Bramber through use of land with a low landscape impact and by focusing development on previously developed land	<ul style="list-style-type: none"> - Loss of/impact on views of value. - Number of planning applications granted in areas with low landscape capacity. - Development on previously developed land. - Loss of views of value, including the conservation area and views from and to the South Downs surrounding Bramber.

Sustainability theme	Objectives	Criteria
		-
4/Soc	To ensure that housing addresses the needs of the existing community of Bramber before addressing wider needs	<ul style="list-style-type: none"> - Mix of housing built by dwelling size. - Number of people with a local connection on the Housing Register that are newly housed. - Number of affordable homes completed.
5/Econ	To maximise the potential of existing employment/employers and support the need for new employment opportunities.	<ul style="list-style-type: none"> - Number of existing businesses retained. - Number of new businesses in the parish. - Number of local start-ups. - Number of new jobs likely to be created. - Number of businesses and dwellings (for home workers) with access to ultrafast broadband.
6/Env	To protect the identity and local distinctiveness of Bramber by conserving and enhancing the historic environment, heritage assets and their settings	<ul style="list-style-type: none"> - Number of listed buildings in built-up area. - Number of applications for listed building consent. - Number of developments within or adjacent to a Conservation Area. - Number of developments within or adjacent to a Conservation Area. - Number of trees with TPOs.
7/Soc	To ensure that the community has a high quality and healthy lifestyle.	<ul style="list-style-type: none"> - Census figures on long term illness and general health. - Number/area of green spaces within walking distance of homes. - Usage of formal green spaces within the parish. - Number of formal recreation facilities within walking distance of homes. - Number of homes experiencing unacceptable levels of noise. - Air quality readings locally.
8/Soc	To ensure the provision / adequate access to services and facilities that provide for the needs of the community, including health facilities, convenience shops, schools, broadband, leisure facilities.	<ul style="list-style-type: none"> - Number of community facilities within the parish, distinguished by target user age. - Distance the population of the parish live from key services. - Availability of regular public transport. - Number of shops in the village. - Speed of broadband services.
9/Econ	To protect, manage, enhance and expand the sustainable visitor experience in Bramber.	<ul style="list-style-type: none"> - Number of visitor facilities serving the village and wider parish. - Number of day visitors. - Number of staying visitors.

Sustainability theme	Objectives	Criteria
10/Soc	To improve safe and sustainable movement around the parish and to the town centre by a range of modes	<ul style="list-style-type: none"> - Levels of traffic using the A283, using Bramber Bridge and at other key junctions in the parish. - Number and distance of new footpaths/cyclepaths. - Speed data from police. - Accident data from police. - Number of safe crossing points serving the town centre. - Number of public parking spaces.

7 ASSESSMENT OF SUSTAINABILITY OF PLAN POLICIES AND SITE OPTIONS

- 7.1 The sustainability appraisal objectives shown in Table 6.1 will be used to assess the sustainability of the plan policy options and of the site options.
- 7.2 The decision to include sites or not has yet to be confirmed. In respect of any sites contained in the Plan, this appraisal will be undertaken on all of the sites submitted and the information presented to the community as part of the ongoing engagement process in order to understand which sites are the most sustainable and are best able to deliver against the objectives of the Neighbourhood Plan.
- 7.3 In order to ensure a comprehensive approach, possible sites for development were gleaned from two sources:
- The HDC Strategic Housing Land Availability Assessment (SHLAA) process
 - The South Downs National Park Strategic Housing Land Availability Assessment (SHLAA) process
 - A separate Local Call for Sites process undertaken by the Neighbourhood Plan
- 7.4 Sites will be reviewed to establish whether there are any sites that are clearly unavailable and/or unsuitable and/or undeliverable. The remaining sites will then be subject to the sustainability assessment, the policies of the Horsham District Planning Framework (Nov 2015), rural exception sites and small sites (<6 units).
- 7.5 For each sustainability objective, the assessment will consider the merits of each site against set criteria. In the summary, an overall judgement will be made on the following scale:
- The site is appropriate for development
 - The site has minor constraints (that can be overcome)
 - The site has significant constraints
 - The site is unsuitable for development
- 7.6 Where necessary, a commentary will also be provided for each judgement.
- 7.7 For each sustainability objective, the assessment will give a score in respect of the relevant criterion. The score will be made on the following scale:
- Strongly positive
 - Slightly positive
 - Neutral
 - Slightly negative
 - Strongly negative

- 7.8 A commentary will also be provided for each criterion on each site in order to provide more context to the 'five-point' assessment.
- 7.9 The same assessment will be used to address the plan policies against alternatives.
- 7.10 Table 7.1 below relates the sustainability objectives back to the key concerns and valued aspects of the parish that were raised by the community. These were identified by the community through the engagement process on the neighbourhood plan and informed the SWOT analysis in Section 5.

Table 7.1: Comparison of sustainability objectives with valued aspects and concerns raised by the community of Bramber

	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape character	4/Soc – Housing need	5/Econ - Employment	6/Env - Heritage	7/Soc - Health	8/Soc – Community facilities	9/Econ – Visitor economy	10/Soc – Transport & Movement
VALUED ASPECTS										
Countryside and landscape	√	√	√							
Heritage of village						√				
Range of community facilities							√	√		
Shops and services in village centre					√		√	√	√	
Visitor offer								√		
Access to nearby larger village/ towns					√			√		√
Right of way network										√
CONCERNS										
Traffic speed/volume										√
Public transport										√
Cycling/walking opportunities							√			√
Vulnerability of services					√			√		
Lack of affordable housing				√						
Housing mix not suitable for local needs				√						
Loss of rural character	√	√	√							
Local employment opportunities					√				√	
Broadband speed					√			√		

8 NEXT STEPS

- 8.1 This Scoping Report has been subject to consultation for a 5-week period and has been amended to address the comments received. This will inform the development of the Sustainability Report, to be published alongside the Neighbourhood Plan.
- 8.2 As the Neighbourhood Plan is developed, the strategy, policies and site options will be tested against these sustainability objectives, to identify appropriate policies for inclusion in the Plan. All realistic policy options will be appraised against the Sustainability Framework set out in Section 5 of this report, in order to ensure that the policies chosen for the Bramber Neighbourhood Plan are the most sustainable, given all realistic alternatives.

Part Two

Habitats Regulation Assessment

Screening request for consultation

9 INTRODUCTION TO HRA SCREENING REQUEST

- 9.1 Section two of this report represents a screening of the need for a Habitats Regulations Assessment (HRA) under Directive 92/43/EEC, also known as the Habitats Directive⁸.
- 9.2 HRA is the a two-stage process to consider whether a proposed development plan or programme is likely to have significant effects on a European site designated for its nature conservation interest. First, plans or programmes must be screened to determine if they are likely to have a significant effect (and are not plans connected to the management of the European site(s) in question). If it cannot be demonstrated during at the screening stage that the plan or programme will not have significant effects of the European site(s), an 'Appropriate Assessment' (AA) must then be undertaken, which is a much more detailed study of the effects of the plan or programme. The two parts together form a full HRA.
- 9.3 In determining whether a proposed development plan or programme is likely to have significant effects, the local authority must incorporate the 'precautionary principle' into its decision. This means that if there is uncertainty as to whether the plan or programme would cause significant effects on a European site, the full AA would be required.
- 9.4 This report provides a screening opinion on the need for an HRA in respect of the Bramber Neighbourhood Plan.
- 9.5 The development of the Plan has involved a Local Call for Sites. This resulted in two sites being submitted within the Neighbourhood Area and taken forward for more detailed assessment. Site 1 is located in Horsham District, Site 2 is in the South Downs National Park. Site 2 has been assessed as unsuitable for development.
- 9.6 Site 1 may or may not be allocated in the Bramber Neighbourhood Plan. This has yet to be determined.**
- 9.7 Site 1, located in Horsham District, is shown in Figure 9.1, and is known as Clays Field. This is currently a privately owned field, with one public right of way crossing it, although the landowner allows access across the whole piece. The development site would comprise approximately 25% of the entire field. The developer proposes approximately 40 dwellings for the site, however there are concerns about the environmental and social impacts of this quantum of development, including due to the role the field plays in managing coalescence between the settlements of Bramber and Steyning.

⁸ Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>.

10 BACKGROUND TO HABITATS REGULATIONS ASSESSMENT IN HORSHAM DISTRICT

Higher level development plans

- 10.1 The potential site for inclusion in the Bramber Plan is located within Horsham District.
- 10.2 Neighbourhood Development Plans do not exist in isolation, and instead sit within the wider national and district level framework for planning. The National Planning Policy Framework (NPPF) sets the broad social, environmental and economic policies in which development can take place. It has a presumption in favour of sustainable development, although paragraph 119 makes it clear this does not apply where development requiring appropriate assessment is being considered, planned or determined.
- 10.3 Within Horsham District, the strategic policies against which planning proposals are considered are contained in the Horsham District Planning Framework (HDPF). The HDPF has been subject to Habitats Regulation Assessment Screening and Appropriate Assessment.
- 10.4 Neighbourhood Development Plans prepared in Horsham District to date have been written to be in conformity with strategic policies identified in the HDPF. In terms of assessing whether Neighbourhood Plans will have any adverse impacts on an international site the starting point for this screening assessment has been the Habitat Regulation Assessment (April 2015) undertaken for the HDPF, and this report should be read in conjunction with that document. This assessment considers the impact of the HDPF requirement for at least 1,500 homes to be identified and delivered through Neighbourhood Development Plans.

Horsham District Council Habitats Regulations Assessment, April 2015

- 10.5 The Habitats Regulation Assessment of the HDPF identified international sites which could be impacted by development of the quantum identified in the HDPF. These sites are described in Table 10.1 including their reason for designation.

Table 10.1: International sites

Name of site	Approx. distance from Horsham DC boundary	Reason for designation
Arun Valley SPA/Ramsar	Inside HDC boundary (but within South Downs National Park)	Internationally important wintering population of Bewick swan. Additionally the SPA qualifies as over winter the area regularly supports 27,241 individual waterfowl (5 year peak mean for 1992/93 to 1996/97).
Arun Valley SAC	Inside HDC boundary (but within South	Ramshorn snail (<i>Anisus vorticulus</i>) for which this is considered to be one of the best areas in the United Kingdom.

	Downs National Park)	
The Mens SAC	2km straight line. 3.5km by road.	Extensive area of mature beech woodland rich in lichens, bryophytes, fungi and saproxylic invertebrates. One of the largest tracts of Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range. Also supports Barbastelle bats.

10.6 The location of these sites compared to Bramber village are:

- Arun Valley SPA – 16.8km
- Arun Valley SAC – 14.9km
- The Mens SAC – 20.4km

There are no other European sites within a 15km radius of the village centre.

10.7 As part of the screening of the HDPF, it was considered whether other international sites within 20km of the HDC boundary could be affected by development in the District. Taking into account the reasons for the designation of these sites, it was concluded that development of land within Horsham District was too distant to have any impact on their integrity and they were screened out of any further assessment. The sites that will be developed through neighbourhood planning will take place within the boundary of Horsham District. As a consequence these development locations will remain too distant to impact on the integrity other international sites (particularly as the quantum of development was considered through the HRA process), and these sites can remain screened out for further Appropriate Assessment of NDPs.

10.8 As both the Arun Valley and the Mens SPA had the potential to be adversely impacted by the HDPF, it was subject to an Appropriate Assessment. This suggested changes to the HDPF after which it was concluded that the HDPF (alone or in combination with other plans) will not have an adverse impact on the European sites. The impacts and mitigation proposed are summarised in Table 10.2

Table 10.2: Measures to avoid adverse impacts on the integrity of European sites

Site potentially affected	Impact	Effect	Mitigation in the HPDF
Arun Valley SPA/SAC/Ramsar	Increased water demand from new housing.	Low river flows/ groundwater levels and consequent water availability issues in wetland sites.	HDPF Policy 38 requires that water quality and availability is maintained

	Increased water demand from new housing.	Water quality deterioration in wetland sites, especially eutrophication through high phosphorus levels.	HDPF Policies 24, 35 and 38 require that there is no pollution of watercourses, groundwater accords with the WFD and necessary upgrades to sewage works are provided before development can take place.
	Increased housing development causing faster run-off and higher flood peaks.	Heightened downstream flood risk in wetland sites, damaging vegetation through prolonged deep flooding in winter, while summer floods threaten invertebrates and make essential site management difficult or impossible.	HDPF Policies 35 and 38 require that technically feasible solutions to reduce flood risk is incorporated into development and design measures ensure that water vulnerability is addressed.
The Mens SAC	Housing development.	Disrupted flight paths and feeding areas for bat populations present within sites.	HDPF Policies 24 and 25 – require development to preserve the integrity of the natural environment and countryside features which support the bat population.

- 10.9 Although it was concluded that the HDPF would not have any impact on international sites, it was highlighted that as the location of some of the homes was not yet known as these would come forward through NDPs and that there was therefore some potential for sites identified in NDPs to have additional impacts on the European sites that could not be identified as part of the higher level assessment. In particular, it was noted that the parishes of Pulborough, West Chiltington, Thakeham, Storrington and Sullington, are located in close proximity to the Arun Valley SAC/SPA/Ramsar site and/or water courses which flow into the site and these are likely to require especially close examination if any significant proposal was to arise through the Neighbourhood Plan process.
- 10.10 Air quality has the potential to impact on the integrity of international sites, but it is very difficult to pinpoint the impact of a specific development on an international site. This is because air pollutants have a range of sources, few of which originate in defined projects identified in local plans. The cumulative impact of air pollutants from transport, domestic and industrial development together with transnational sources is however impacting sites such as the Mens SAC, where nitrogen deposition is causing a problem. The issue was however screened out of the HDPF HRA as there were no proposals that could clearly have a significant adverse impact.

Nevertheless there is the potential that proposals in NDPs could have specific impacts, and this issue has therefore been revisited.

11 APPROACH TO SCREENING TO BRAMBER NEIGHBOURHOOD PLAN

11.1 In screening the emerging Bramber Neighbourhood Plan the following issues have been considered:

- a. Do any of the proposed policies increase quantum of development beyond 1,500 homes? If this is the case, then additional impacts to sites not assessed in the Appropriate Assessment of the HDPF?
- b. Will the development locations on the plan have any direct or indirect impacts on the Arun Valley SAC/SPA/RAMSAR or the Mens SAC (including air quality) that cannot be avoided by the application of the policies in the HDPF?
- c. Are there any additional policies within the plan which could impact alter the mitigation measures set out in the Council's HDPF?
- d. Do any of the above apply in combination with other plans or programmes?

Assessment of the Bramber Neighbourhood Plan

- a. ***Do any of the proposed policies increase quantum of development beyond 1,500 homes? If this is the case, then additional impacts to sites not assessed in the Appropriate Assessment of the HDPF?***

11.2 As part of the Bramber Neighbourhood Plan, a Housing Needs Assessment was prepared which projected an unconstrained figure of **approximately 60 new dwellings in the parish** over the course of the Neighbourhood Plan. The AECOM approach to determining Housing Need approach has been endorsed by Horsham District Council.

11.3 Only two sites emerged from the Local Call for sites. **It is not yet decided whether any allocations will be put forward in the Plan**, however the potential overall quantum of development is within that assessed in the HRA of the HDPF and no additional impacts will arise in this respect.

- b. ***Will the development locations on the plan have any direct or indirect impacts on the Arun Valley SAC/SPA/RAMSAR or the Mens SAC (including air quality) that cannot be avoided by the application of the policies in the HDPF?***

11.4 The potential sites for identified do not directly adjoin the Arun Valley or the Mens woodland.

11.5 If the Plan is made, and does include a site allocation, the proposals for the potential development site identified in Bramber NDP will be considered in the context of the policies in the HDPF, which avoid any adverse impact on the site. In addition, paragraph 9.13 of the HDPF reflects the decision to declare the whole District as an emission reduction area which means all developments in Horsham District must make reasonable endeavour to minimise air quality emissions and this is also reflected in Policy 24. This will prevent any impacts to air quality which could potentially be attributed to development.

c. Are there any additional policies within the plan which could impact the mitigation measures set out in the Council's HDPF?

- 11.6 The Bramber Plan does not propose any policies which conflict with the requirements incorporated in the HDPF policies as set out in Table 10.2 or Policy 24 (Environmental Protection) which addresses air quality issues.

d. Do any of the above apply in combination with other plans or programmes?

- 11.7 Question a. considers the total level of development in combination of all neighbourhood development plans. District wide impacts have been considered through the HRA of the HDPF, and this process will continue as other authorities undertake any necessary Appropriate Assessments of their own plans and programmes.

12 SCREENING OUTCOME

- 12.1 The screening assessment which has been undertaken concludes that **no likely significant effects in respect of the European sites within 20km of Horsham district** will occur as a result of the implementation of the Bramber Neighbourhood Plan **with or without a site allocation**.
- 12.2 Natural England was consulted on this assessment and concurred that there would be no likely significant effect on the European sites named in the report.
- 12.3 As such, the Neighbourhood Plan does not require a full HRA to be undertaken.

APPENDIX A – Responses received to SEA Scoping

Natural England

Date: 31 July 2019
Our ref: 289020
Your ref: Bramber SEA and HRA Screening



Cllr Roger Potter (Chair)
Bramber Neighbourhood Plan Group
Bramber Parish Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY
bramberplan@gmail.com

T 0300 060 3900

Dear Cllr Potter,

SEA and HRA Screening of Bramber's Neighbourhood Development Plan

Thank you for your consultation on the above dated 26th June 2019 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Strategic Environmental Assessment Screening

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Habitats Regulations Assessment Screening

Natural England welcomes the consideration given to the Habitats Regulations. We agree with the conclusion of the report of no likely significant effect upon the named European designated sites:

- [Arun Valley](#) Special Protection Area (SPA) – 16.8km
- [Arun Valley](#) Special Area of Conservation (SAC) – 14.9km
- [The Mens](#) Special Area of Conservation (SAC) – 20.4km

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

We refer you to the advice in the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Victoria Kirkham
Consultations Team

Historic England

From: **Lloyd Sweet, Robert** <Robert.LloydSweet@historicengland.org.uk>
Date: Fri, Jul 26, 2019 at 6:28 PM
Subject: FW: Bramber Neighbourhood Plan
To: [REDACTED]

Dear [REDACTED]

Thank you for consulting Historic England on the scoping report for the Bramber Neighbourhood Plan. We're really pleased to see how the scoping report already engages with the historic environment, identifying patterns in the distribution of heritage assets, such as the focus of listed buildings at the Street and the survival of the extent of the medieval town, overlain by later, 18th century buildings.

One area we note that does not appear to be covered at present is undesignated archaeological remains. The West Sussex Historic Environment Record is the main repository of data on the previously identified areas of archaeological remains in Bramber and should be noted as a source of data in the baseline. Using the Heritage Gateway website we can see that there are 87 records on the HER relating to Bramber Parish. These include such diverse features as from records of excavations, Second World War practice trenches and barbed wire, medieval hearths associated with salt workings to individual Roman coins and the medieval town itself. The NPPF sets out an approach that prioritises the conservation of archaeological remains, with great weight to be given to remains of national importance even where these are not already scheduled monuments.

It may also be helpful to identify that the West Sussex HER contains the historic landscape characterisation database for the county, which provides a baseline of the origins of present landscape character as character areas that offer a fine level of detail. This can also be used to identify patterns in the plan area's historic landscape character or to identify areas that were once common but now rare or that are likely to be most at risk from development pressures in the periphery of the town.

When plans involve site selection, Strategic Environmental Assessment or Sustainability Appraisals are an important means of demonstrating how environmental impacts have been considered. We recommend that the assessment of impact on heritage assets is described quite clearly, including discussion of how exactly they would be affected (either directly or indirectly) and how choices for or against allocation, or the inclusion of requirements to secure protection of assets or to avoid or minimise harm have been taken into account. This needs to make clear that great weight has been given to the need to conserve designated heritage assets in particular, including the positive contribution to their significance made by their settings. Unfortunately, failing to clearly demonstrate how this consideration has been adequately given is a point of failure for some neighbourhood plans. To support you in doing this we thoroughly recommend reading our advice notes on sites allocation affecting heritage in local plans (which is also relevant to neighbourhood planning) and our advice on considering the impact of proposals on the settings of heritage assets, both of which can be downloaded at <https://historicengland.org.uk/advice/planning/planning-system/>.

Further advice on considering the historic environment in Neighbourhood Planning is available from Historic England at: <https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/>

And you are always welcome to contact me if you have queries about both understanding potential impacts of policies on heritage assets or to consider potential opportunities to harness the value of heritage to achieve other objectives through your neighbourhood plan.

Yours sincerely

Robert Lloyd-Sweet

Rob Lloyd-Sweet | Historic Places Adviser | South East England | Historic England

Cannon Bridge House | 25 Dowgate Hill | London | EC4R 2YA

Environment Agency

----- Forwarded message -----

From: **Hyland, Hannah** <hannah.hyland@environment-agency.gov.uk>

Date: Tue, Jul 30, 2019 at 9:17 AM

Subject: RE: BRAMBER NEIGHBOURHOOD PLAN

To: [REDACTED]

Dear [REDACTED]

Thank you for the consultation on the SEA Scoping Report for the Bramber Neighbourhood Plan.

The Environment Agency is a statutory consultee for Strategic Environmental Assessments and provides advice to Local Planning Authorities on the scope and finding of the SEA. We have reviewed your Scoping Report and are pleased to see that issues within our remit have been included within our specific objectives, notably flood risk and water quality.

Please also find attached a Neighbourhood Plan Checklist we have produced for Neighbourhood Plan groups in Horsham District Council area which you may find useful in progressing the SEA and Neighbourhood Plan itself.

Kind regards,

Hannah

South Downs National Park Authority

----- Forwarded message -----

From: **Amy Tyler-Jones** <Amy.Tyler-Jones@southdowns.gov.uk>

Date: Tue, Jul 30, 2019 at 11:17 AM

Subject: SDNPA comments on SEA/SA scoping report and HRA screening assessment

To: [REDACTED]

Hello [REDACTED]

Please see below for our comments on the SEA scoping report and HRA screening assessment. Any queries, please do get in touch.

Bramber SEA scoping report

Section 3

In addition to the South Downs Local Plan (SDLP), reference should be made the Partnership Management Plan (PMP). The PMP is an overarching strategy for the management of the South Downs National Park. The first phase of the PMP covered the period 2014-2019, outcomes and priority programmes have been identified for the second phase of the PMP.

This section also refers to a number of county level evidence-base documents. Reference should also be made here to the South Downs Integrated Landscape Assessment.

Section 4 – Baseline Data

Landscape – reference should also be made the SDILCA here. The parish includes the following character areas:

- Adur Floodplain
- Adur Valley Sides
- Arun to Adur Open Downs
- Arun to Adur Scarp Footslopes

Specific sensitivities on the scarp footslopes include Bramber Castle, a major landmark on the Adur floodplain. Development considerations specific to the footslopes include minimising the use of excessive lighting, signage and 'suburban' features on the edge of Steyning.

The baseline data section doesn't consider climate change. Part of the built up area is within the flood zone of the River Adur, risk of flooding to properties could increase with climate change.

Section 6 Sustainability Appraisal Framework

ENV2 – recommend this objective is more explicit in seeking a net gain in biodiversity in line with national and SDLP policy.

ENV3 – recommend this objective seeks to protect landscape character.

HRA Screening Assessment

A HRA Screening Assessment of the Bramber NDP has been undertaken. This assesses whether there are likely to be any potential significant effects on internationally important wildlife sites Natura 2000 (also known as European sites) and therefore whether further HRA work is required. The SDNPA makes the following comments on the HRA screening assessment:

The Mens Special Area of Conservation is designated for its woodland habitat and because it is home to barbastelle bats. Development within 7km of the SAC has potential to affect barbastelle flightlines and foraging areas. The settlement of Bramber is located approximately 20km from the designated site, therefore this impact can be screened out.

The Arun Valley Special Protection Area (SPA) and Ramsar site is designated for its wintering population of Bewick's swan. It is widely accepted that Bewick's swans feed on suitable farmland up to 5km from the designated site. As such, suitable fields within 5km of the SPA could constitute important supporting habitat if they support a large enough percentage of the SPA population on a regular basis. The settlement of Bramber is located approximately 15 kms from the designated site, therefore this impact can be screened out.

Other potential impact pathways in relation to the Arun Valley SPA and Special Area of Conservation (SAC) are: - Hydrology (water quantity (abstraction) and water quality (siltation and wastewater treatment) recreational pressure from increased visitors and air quality impacts from increased traffic movements. In terms of water quantity (abstraction): the Appropriate Assessment for the Southern Water Water Resource Management Plan considered future public water supply abstraction impacts on the Arun Valley SAC/SPA/Ramsar site. It concluded that no adverse effects on integrity of the SAC/SPA/Ramsar site would arise. With regards to wastewater treatment, provided new development can be accommodated within the existing consent headroom for the relevant wastewater treatment works, it is considered that the existing initiatives being implemented to ensure compliance of relevant Wastewater Treatment Works discharges and improve diffuse pollution will ensure that there will not be a likely significant effect on the Arun Valley SAC/SPA/Ramsar site.

Recreational pressure is not identified as a specific issue in the Site Improvement Plan for the Arun Valley SAC/SPA/Ramsar. In terms of air quality, the scale of development proposed at Bramber is such that there are not likely to be significant effects alone. However, air quality is a potential issue when considered in combination with other plans and projects. Given the strategic nature of in-combination traffic and air quality effects, this issue is by definition, one that cannot be fully explored and resolved by an individual neighbourhood plan. The National Park Authority has undertaken assessment work on air quality as part of HRA of the Pre-Submission Local Plan, which has

considered these in-combination effects. This impact has therefore been screened out as it has been assessed and addressed through the HRA of Local Plan, which was formally published in September 2017.

The SDNPA, therefore agrees with the HRA screening assessment that HRA is not required.

Best wishes

Amy

Amy Tyler-Jones
Senior Planning Policy Officer
South Downs National Park Authority

Tel: 01730 819272

Please note my working days are Monday - Wednesday

South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH