



## **FERRING PARISH**

## **NEIGHBOURHOOD PLAN 2014 - 2029**

## **Strategic Environmental Assessment**



**Published by Ferring Parish Council under the EU Directive 2001/42 on Strategic Environmental Assessment and the Environmental Assessment of Plans & Programmes Regulations 2010.**

**April 2014**

## NON TECHNICAL SUMMARY

- The purpose of this draft report is to provide an assessment of any significant environmental effects resulting from the policies and proposals of the Neighbourhood Development Plan for Ferring Parish ("the Neighbourhood Plan") in accordance with EU Directive 2001/42 on strategic environmental assessment ("the SEA") and the Environmental Assessment of Plans & Programmes Regulations 2010 ("the EA Regulations").
- The Neighbourhood Plan will be submitted by the Parish Council under the Neighbourhood Planning (General) Regulations 2012 ("the NP Regulations").
- Strategic Environmental Assessment (SEA) involves the evaluation of the environmental impacts of a plan. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law under the EA Regulations.
- The Neighbourhood Plan contains a number of policies for the use and development of land in the parish of Ferring in the plan period from 2014 to 2029. These policies, together with the policies of the Arun and South Downs National Park development plans - that is the saved policies of the 2003 Arun Local Plan and their eventual replacement by the forthcoming Arun and National Park Local Plans - and the National Planning Policy Framework (NPPF), will be used by the local planning authorities in determining planning applications.
- The State of the Parish Report for the Neighbourhood Plan published by the Parish Council in December 2012 identified the key features of the local environment. These are:
  - two Sites of Nature Conservation Importance at Ferring Rife and at Highdown Hill
  - one Conservation Area centred on the southern end of Ferring Street and the area west of the church including Greystoke Manor
  - one Scheduled Ancient Monument (at Highdown Hill)
  - 25 listed buildings (comprising the Grade I Parish Church of St. Andrew with the remainder all Grade II)
- The location of the northern part of the parish within the National Park requires a sensitivity of the Neighbourhood Plan to meeting its strategic objectives. The landscape character of this part of the National Park has been assessed as having generally low to negligible capacity for development.
- The parish of Ferring is predominantly low density residential in character. Its flat topography results in long views to Highdown Hill and the National Park to the north. The beach is of biodiversity interest and its western and eastern boundaries are defined by important open landscape gaps separating the village from its neighbours.
- With the village there are clusters of listed buildings within and close by the designated Ferring Conservation Area and a number of other identified 'locally listed' buildings (on the Buildings & Structures of Character schedule held by the District Council and forming a Supplementary Planning Document of 2005). In addition, it has a small number of cherished public open spaces that have informal and formal recreational value and provide a visual break in the developed area.

- There are no specific environmental problems to which the Neighbourhood Plan is intended to directly respond though it must be mindful of the susceptibility of the village to flooding from the Ferring Rife and from surface water flooding during heavy rainfall events.
- The Neighbourhood Plan has been prepared with the assumption that the Arun and South Downs National Park development plans contain all the appropriate policies to protect the local environment, based on the saved policies of the 2003 Local Plan and on those of the new Local Plans. It does not therefore seek to repeat such policies, though does refine some to apply to a Ferring context.
- To assess the likely effects of the Neighbourhood Plan on the environment, the most relevant environmental sub-objectives used by the Arun District Council Sustainability Framework of 2013 have been selected.
- This report adopts an over-arching environmental objective – to enhance Arun’s environmental integrity – and sub-divides it into eleven more detailed objectives. The environmental sub-objectives considered to be of relevance to the Neighbourhood Plan are set out below, together with the measures identified for each objective.
- In each case, the measures have been refined following representations received on the proposed scope of the SEA and on the draft SEA to make them more relevant to Ferring.

| Neighbourhood Plan SEA Objective   | Neighbourhood Plan SEA Measures   |
|--|---|
| Historic Environment - protect, enhance and make accessible for enjoyment the historic environment   | <ul style="list-style-type: none"> <li>• no. of designated and non-designated heritage assets affected by Neighbourhood Plan policies</li> </ul>  |
| Designated Environmental Sites - maintain and enhance biodiversity, flora and fauna and protect, enhance and make accessible for enjoyment the countryside | <ul style="list-style-type: none"> <li>• no. of nationally or locally designated wildlife and geological sites (SSSI, SINIC) affected by Neighbourhood Plan policies</li> <li>• no. of nationally or locally designated landscapes (National Park, strategic gaps, public open spaces) affected by Neighbourhood Plan policies</li> </ul> |
| Flood Risk - reduce vulnerability to climate change  | <ul style="list-style-type: none"> <li>• Ha area of Neighbourhood Area at risk from flooding, as defined by the Environment Agency, as a result of Neighbourhood Plan policies</li> </ul>   |

- The comparison of objectives suggests that the Neighbourhood Plan has the potential to deliver strong positive environmental impacts, even though only very modest development is proposed. Provided designated environmental sites are avoided through the location of development, or through design

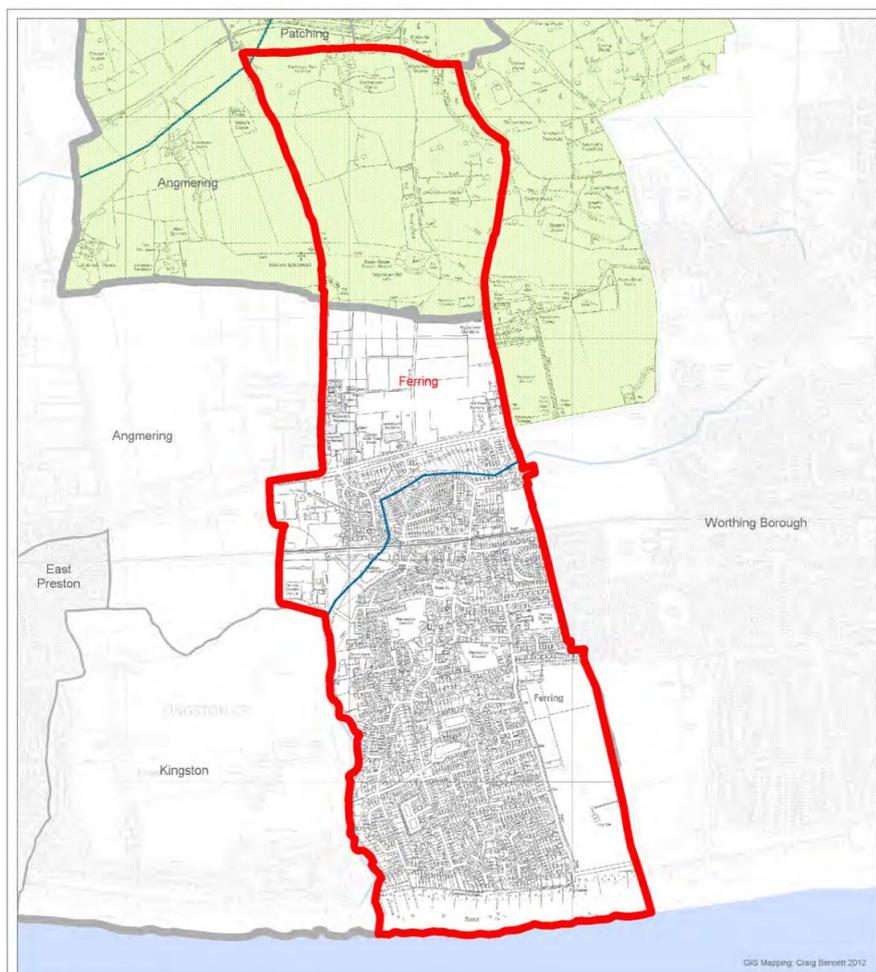
solutions that are sensitive to their setting, then there is unlikely to be any significant adverse environmental effects resulting from the Neighbourhood Plan's objectives.

- All the policies have sought to protect and enhance the surrounding natural assets of the village and its own heritage assets. The locational decisions have been driven by achieving a significant community benefit outcome, the like of which may simply not have been possible without a combination of the Neighbourhood Plan and the Orders. Where necessary, the policies have ensured that key development principles are secured at the outset, leaving the saved policies of the development plan to ensure subsequent planning applications will provide the detail to assess impact at a finer grain than possible in this assessment.

## 1. Introduction

1.1 The purpose of this draft report is to provide an assessment of any significant environmental effects resulting from the policies and proposals of the Neighbourhood Development Plan for Ferring Parish ("the Neighbourhood Plan") in accordance with EU Directive 2001/42 on strategic environmental assessment ("the SEA") and the Environmental Assessment of Plans & Programmes Regulations 2004 ("the EA Regulations").

1.2 The Neighbourhood Plan is being prepared by Ferring Parish Council ("the Parish Council") as the Qualifying Body under the NP Regulations. It covers the whole parish area and was designated as a Neighbourhood Area by Arun District Council ("the District Council") on 10 December 2012 and by the South Down National Park Authority ("the National Park") on 14 March 2013, given the parish falls within the administrative areas of both local planning authorities.



Ferring Designated Neighbourhood Area

1.3 The Neighbourhood Plan is being submitted by the Parish Council to the local planning authorities for independent examination under the Neighbourhood Planning (General) Regulations 2012 ("the NP Regulations"). This follows:

- Arun District Council, as the local planning authority, issuing its formal screening opinion requiring an SEA in December 2013;
- A scoping letter being consulted on with the statutory authorities for a five week period (under Regulation 12 of the EA Regulations);
- a first draft SEA being incorporated into the Pre Submission Neighbourhood Plan (as Section 6) for a six week consultation period in May/June 2013; and
- a second draft SEA accompanying the Revised Pre Submission Neighbourhood Plan for a six week consultation period in February/March 2014.

1.4 The responses received on the scope and content of the first and second draft SEAs, as well as the Neighbourhood Plan itself, have been taken into account in the preparation of this final SEA report. In general, these responses have required two types of amendment to the SEA report: greater depth of commentary to accompany the assessment of each policy; and a clearer assessment of any alternative policy options, where relevant. Although care has been taken to ensure the report is proportionate to the task of assessing this particular Neighbourhood Plan, and to acknowledge the lack of meaningful data reported at this small scale to aid assessment, the report does seek to address these responses effectively.

1.5 The Neighbourhood Plan remains amongst the first to be prepared in England and only the second to make specific provision for Community Right to Build Orders ("the Orders") under the NP Regulations to implement key policies within the Neighbourhood Plan. It is also amongst the first Neighbourhood Plans to be subject to an SEA alone, and not Sustainability Appraisal, as the Government has made clear that such plans are not subject to appraisal. In which case, it is accepted that the process of preparing the Neighbourhood Plan, the Orders and the SEA has been a new challenge for the Parish Council and for the local planning authorities.

1.6 A clear distinction is made between statutory land use policies and non-statutory proposals and it is now only the former that have been assessed in the SEA. The latter remain in the document for completeness, as they are important to local people, but they do not form part of the Neighbourhood Plan to be formally examined. A list of evidence base documents is attached to this report as Annex A.

1.7 That said, there have been no material changes made to the land use policy content of the Neighbourhood Plan as the representations received during the consultation period were generally supportive.

## 2. Background to Strategic Environmental Assessment

2.1 Strategic Environmental Assessment (SEA) involves the evaluation of the environmental impacts of a plan. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law under the EA Regulations and requires the following matters to be addressed:

- An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- The environmental characteristics of areas likely to be significantly affected
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC
- The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation
- The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors
- The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan
- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
- A description of measures envisaged concerning monitoring in accordance with Article 10

2.2 Since 2004, the requirement for SEA of relevant plans and programmes has been incorporated into the similar process of Sustainability Appraisal (SA) in the UK. During the preparation of the Neighbourhood Plan, the Government confirmed that an SA is not required of a Neighbourhood Plan but that SEA may still be necessary in circumstances where policies may have a significant environmental effect.

2.3 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan in a relatively small parish area. It focuses only on the requirements of SEA and does not extend to cover the wider sustainability attributes of a Sustainability Appraisal.

2.4 The report responds to each of the SEA requirements in turn, beginning with a short description of the Neighbourhood Plan, identifying the key environmental features of the parish and then assessing the impact of the strategic objectives and policies of the Neighbourhood Plan on those features, using a number of SEA objectives and measures.

### **3. An outline of the contents, main objectives of the Neighbourhood Plan and relationship with other relevant plans or programmes**

3.1 The Neighbourhood Plan contains a number of policies for the use and development of land in the parish of Ferring in the plan period from 2014 to 2029. These policies, together with the policies of the Arun and South Downs National Park development plans - that is the saved policies of the 2003 Arun Local Plan and their eventual replacement by the forthcoming Arun and National Park Local Plans - and the National Planning Policy Framework (NPPF), will be used by the local planning authorities in determining planning applications.

3.2 The Vision of the Neighbourhood Plan (set out in its section 3) is:

*"By 2029, the parish of Ferring will have become a more balanced community than it was in 2013, with young families living happily alongside the early retirees, all enjoying the peace and beauty that its older residents have valued for many years.*

*Conserving that relaxed and attractive environment will have been achieved through the limited release of land for development, which has allowed for some new housing to meet the needs and demands of the local community but also has maintained the distinctive character of the village's buildings, lanes, streets and spaces and sea front.*

*New development will have enabled the community to create a cherished, multi-purpose community centre and improve other facilities around the village. This development has not impacted on its most sensitive South Downs landscapes nor on the character of the village and its cherished open spaces and historic buildings and areas, which have continued to have strong protection."*

3.3 In pursuit of this Vision, the Neighbourhood Plan contains four strategic objectives, each with specific indicators against which the successful implementation of the Plan will be measured:

1. To secure the long term future of community facilities that help make village special:
  - a. A new multi-purpose community centre
  - b. Two vibrant village centres
  - c. Open spaces within the village for informal recreation

2. To plan and deliver a range of housing mix and types in locations with good access to services and facilities by foot and bus as well as car
  - a. new homes built on previously used land
  - b. the majority of houses of a type and tenure suited to meet local demand
3. To offer greater protection to the village's surrounding countryside, coastline, heritage assets and special character:
  - a. No development outside the existing built up area boundary
4. To plan for climate change and work in harmony with the environment to conserve natural resources
  - a. Fewer properties significantly affected by surface water flooding

3.4 The Neighbourhood Plan sets out a range of housing, community asset and environmental policies and proposes to make three Orders. These policies are each assessed in section 6 of the SEA below. It has been prepared in anticipation of the replacement of the 2003 Local Plan with a new Arun Local Plan and the first South Downs National Park Local Plan. In respect of the former, it has been informed by the Submission Arun Local Plan published by the District Council in May 2013 and its evidence base, including the Arun District Council Sustainability Framework(ADCSF).

3.5 The District Council published the 'Publication Version of the Local Plan (Regulation 19) but it excludes a number of key policies and, although approved for use as a material planning consideration, the final document will not be adopted prior to the examination of the Neighbourhood Plan and its contents have not informed its preparation. However, the content of the new policies are broadly in line with those of the May 2013 policies.

3.6 For the National Park, an 'Options Consultation' document was published in February 2014. This document sets out a vision and objectives for the Park and consults on options for policy development for the plan to cover a 15 or 20 year period from its adoption (likely to be in 2017). The options contain no specific policies or proposals that will result in change in that part of the parish in the Park.

3.7 The Neighbourhood Plan is obliged to be in general conformity with the strategic policies of the development plan and to contribute to the achievement of sustainable development. It must also reflect national planning guidance (of the NPPF), especially relating to the importance of conserving the landscape and scenic beauty of the National Park (para. 115). More locally, there are no other significant plans or programmes, of which the Neighbourhood Plan has had to take account, given the scale and location of its proposals.

#### **4.The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the Neighbourhood Plan**

4.1 The State of the Parish Report for the Neighbourhood Plan published by the Parish Council in December 2012 identified the key features of the local environment. These are:

- two Sites of Nature Conservation Importance at Ferring Rife and at Highdown Hill
- one Conservation Area centred on the southern end of Ferring Street and the area west of the church including Greystoke Manor
- one Scheduled Ancient Monument (at Highdown Hill)
- 25 listed buildings (comprising the Grade I Parish Church of St. Andrew with the remainder all Grade II)

4.2 The quality and status of the local natural and built environment is therefore of importance to future planning decisions in the parish and these environmental designations form the baseline data for the assessment. Further information is available in the State of the Parish report and in the evidence base of the Neighbourhood Plan.

4.3 Should the Neighbourhood Plan not be adopted then decisions on future planning applications will be made using the policy provisions of the Arun and South Downs National Park development plans and the NPPF. Given the limitation on the Neighbourhood Plan to make only local and not strategic planning policy for the parish, the current state of these environmental features will not be affected by a failure to adopt or to implement the Neighbourhood Plan.

#### **5. The environmental characteristics of areas likely to be significantly affected**

5.1 The designated environmental features of the parish are identified in the Neighbourhood Plan and are described in the State of the Parish report. The location of the northern part of the parish within the National Park requires a sensitivity of the Neighbourhood Plan to meeting its strategic objectives. The landscape character of this part of the National Park has been assessed as having generally low to negligible capacity for development.

5.2 The parish of Ferring is predominantly low density residential in character. Its flat topography results in long views to Highdown Hill and the National Park to the north. The beach is of biodiversity interest and its western and eastern boundaries are defined by important open landscape gaps separating the village from its neighbours.

5.3 With the village there are clusters of listed buildings within and close by the designated Ferring Conservation Area and a number of other identified 'locally listed' buildings (on the Buildings & Structures of Character schedule held by the District Council and forming a Supplementary Planning Document of 2005). In

addition, it has a small number of cherished public open spaces that have informal and formal recreational value and provide a visual break in the developed area.

## **6. Any existing environmental problems that are relevant to the Neighbourhood Plan**

6.1 There are no specific environmental problems to which the Neighbourhood Plan is intended to directly respond though it must be mindful of the susceptibility of the village to flooding from the Ferring Rife and from surface water flooding during heavy rainfall events.

6.2 Rather, the primary purpose of the Neighbourhood Plan is to bring forward bespoke land use planning based solutions to longstanding housing, community asset and retail problems. These solutions may each have a beneficial, indirect environmental impact but this is not what is driving them. Importantly too, the Neighbourhood Plan seeks to protect the special, open landscape character that defines the village from its neighbours and from the National Park. It aims to do so by minimising the environmental impact of the allocations by selecting suitable sites, when considered along other social and economic policy objectives.

## **7. The environmental protection objectives that are relevant to the Neighbourhood Plan and the way those objectives and any environmental considerations have been taken into account during its preparation**

7.1 The Neighbourhood Plan has been prepared with the assumption that the Arun and South Downs National Park development plans will contain all the appropriate policies to protect the local environment, based on the saved policies of the 2003 Local Plan and on those of the new Local Plans. It does not therefore seek to repeat such policies, though it does refine some to apply to a Ferring context.

7.2 Crucially, the National Park, two Strategic Gaps and a number of designated nature sites and heritage assets cumulatively impose considerable environmental constraint on development. These existing legal and policy provisions carry great local community support and it has therefore been the role of the Neighbourhood Plan to work with the grain of these constraints.

7.3 The Neighbourhood Plan has been especially mindful of resolving its housing, community asset and retail challenges without requiring incursions into the surrounding landscape or undermining the significance of the heritage assets of the village. Neither outcome would be supported by the local community.

## 8. The likely significant effects on the environment

8.1 To assess the likely effects of the Neighbourhood Plan on the environment, the most relevant environmental sub-objectives used by the ADCSF (of 2013) have been selected.

8.2 This report adopts an over-arching environmental objective – to enhance Arun's environmental integrity – and sub-divides it into eleven more detailed objectives. The environmental sub-objectives considered to be of relevance to the Neighbourhood Plan are set out below, together with the measures identified for each objective. In each case, the measures have been refined following representations received on the proposed scope of the SEA and on the draft SEA to make them more relevant to Ferring.

| Neighbourhood Plan SEA Objective   | Neighbourhood Plan SEA Measures   |
|--|---|
| Historic Environment - protect, enhance and make accessible for enjoyment the historic environment   | <ul style="list-style-type: none"> <li>no. of designated and non-designated heritage assets affected by Neighbourhood Plan policies</li> </ul>  |
| Designated Environmental Sites - maintain and enhance biodiversity, flora and fauna and protect, enhance and make accessible for enjoyment the countryside | <ul style="list-style-type: none"> <li>no. of nationally or locally designated wildlife and geological sites (SSSI, SINCS) affected by Neighbourhood Plan policies</li> <li>no. of nationally or locally designated landscapes (National Park, strategic gaps, public open spaces) affected by Neighbourhood Plan policies</li> </ul> |
| Flood Risk - reduce vulnerability to climate change  | <ul style="list-style-type: none"> <li>Ha area of Neighbourhood Area at risk from flooding, as defined by the Environment Agency, as a result of Neighbourhood Plan policies</li> </ul>   |

8.3 The assessment of the strategic objectives and policies of the Neighbourhood Plan against the baseline data in section 4 is made using the following notation: + positive; 0 neutral; and - negative.

8.4 In most cases, it is acknowledged the data is not collected or reported at a parish scale to enable an accurate assessment. In addition, the scale of development proposed in the Neighbourhood Plan is too small in comparison with the scale of existing development in the town, making the identification of cause-and-effect relationships between inputs and outputs very uncertain.

8.5 However, the assessment does seek to identify the relative attributes of the policies of the Neighbourhood Plan to inform the reader.

## Assessing the impact of the Neighbourhood Plan Strategic Objectives

8.6 The four strategic objectives of the Neighbourhood Plan are outlined in para 3.3 above. They cover a range of economic, social and environmental issues in support of realising the Vision. Each of these objectives is assessed against the SEA objectives below.

| Neighbourhood Plan<br>SEA Objective | Neighbourhood Plan Strategic Objectives |                       |                         |                     |
|-------------------------------------|---|-----------------------|-------------------------|---------------------|
|                                     | 1<br>Community<br>Facilities            | 2<br>Housing<br>Needs | 3<br>Environ.<br>Assets | 4<br>Flood<br>Risks |
| Historic Environment                | 0                                       | 0                     | +                       | 0                   |
| Designated Environmental<br>Sites   | 0                                       | +                     | +                       | +                   |
| Flood Risk                          | 0                                       | +                     | +                       | +                   |

8.7 The comparison of objectives suggests that the Neighbourhood Plan has the potential to deliver strong positive environmental impacts, even though only very modest development is proposed. Provided designated environmental sites are avoided through the location of development, or through design solutions that are sensitive to their setting, then there is unlikely to be any significant adverse environmental effects resulting from the Neighbourhood Plan's objectives.

## Assessing the impact of the Neighbourhood Plan policies

8.8 The Neighbourhood Plan contains the following policies, which may have an environmental impact on the key environmental features identified in para 4.1 above. The assessment has compared the proposed policy with either a reasonable alternative or, in the absence of such an alternative, with the Neighbourhood Plan not having a policy.

### **Policy 1 - A Spatial Plan for the Parish**

8.9 The policy directs development to within the built up area boundary of Ferring village only. In doing so, it maintains the rationale and value of the adopted policy device, saved in Policy GEN2 of the 2003 Local Plan, to avoid development affecting designated environmental sites outside the boundary – primarily the National Park – and encourage the identification of land that may have had a previous use, both positive impacts. It will also avoid land in flood zones 2 and 3 altogether. The policy assumes that any negative impacts on the historic environment or on the value of public open spaces within the village will be avoided by the use of other development plan policies in the consideration of planning applications.

8.10 The only reasonable alternative spatial policy would have been to propose an amendment of the existing built up area boundary to allow for an extension of the village either into a Strategic Gap east or west of the village or north beyond the A259 Littlehampton Road into the open countryside setting of the National Park. Much of the Strategic Gap area west of the village is also subject to flooding from the Ferring Rife.

8.11 The District Council (in its Strategic Housing Land Availability Assessment of 2013) assessed two sites (Refs 85 'Land off Sea Lane' and 110 'Land East of Green Park') in the Strategic Gap between Ferring and Worthing. The first it assessed as being unsuitable for development due to the impact of development leading to the coalescence of settlements. The second site was identified as being outside the built up area boundary but potentially suitable in the longer term. No other land has been promoted for development. The assumption is framing the alternative is therefore that of a scheme of 50 homes located either in the Strategic Gap east of the village or on land north of the A259 Littlehampton Road but not in the South Downs National Park.

8.12 Although it is highly unlikely such spatial alternatives would be in conformity with either the development plan or the NPPF, they are assessed here. Both alternative sites compare poorly to the proposed policy. Crucially, both are outside the established built up area boundary. Given how tight the Strategic Gap now is between the village and Worthing, any development of this scale east of the village will have a negative impact on the remaining open landscape character. Development on the open land north of the Littlehampton Road will have a negative impact on the significant setting of the nationally-important heritage asset of Highdown Hill, the character of which depends on the relatively unbroken views above the slope north of the village.

| Neighbourhood Plan<br>SEA Objective | Policy | Alternative |
|-------------------------------------|--------|-------------|
| Historic Environment                | 0      | -           |
| Designated<br>Environmental Sites   | +      | -           |
| Flood Risk                          | 0      | 0           |

### **Policy 2 – Land at Rear of Henty Arms PH, Ferring Lane**

8.13 This policy proposes a housing development that accords with the spatial principles of Policy 1. The site is inside the built up area boundary and has no effect on any designated nature or heritage asset. It lies within Flood Zone 1 and is not subject to groundwater flooding.

8.14 The policy requires the Henty Arms allotment site to be re-provided in a larger and better form than the current site, leading to an overall environmental benefit. The site does not impact on any heritage assets nor will affect the adjoining public house, which is a building of character.

8.15 There are only two other sites in the built up area boundary of Ferring that have either been made available for housing development or have been identified as suitable for such development. Both are provided for in the Neighbourhood Plan (as policies 3 and 4). There are therefore no alternative sites with which to compare this site. A no policy option would be neutral for the most part, given development plan policy, but would miss the opportunity of delivering better allotment provision in the village. It would also require other land to be found close to the village centre for the provision of new homes to suit older households and only land provided for in Policy 3 meets that test.

| Neighbourhood Plan<br>SEA Objective | Policy | No Policy |
|-------------------------------------|--------|-----------|
| Historic Environment                | 0      | 0         |
| Designated<br>Environmental Sites   | 0      | 0         |
| Flood Risk                          | 0      | 0         |

### **Policy 3 – Ferring Village Hall**

8.16 The village hall site will use previously-developed land in the village centre but outside the Conservation Area and its setting. The site is inside the built up area boundary and has no effect on any designated nature asset. It lies within Flood Zone 1 and is not subject to groundwater flooding. However, the policy will result in the loss of a cherished local community asset but which has no special architectural merit. The redevelopment scheme will provide an opportunity to sustain the appearance of the village centre and of the setting to two listed buildings opposite the site on Ferring Street. In making a Community Right to Build Order for the scheme it is assumed the Order, or a planning application, must demonstrate the scheme design realises that opportunity or, at the very least, does not undermine the significance of the setting of the listed buildings, hence the neutral assessment.

8.17 A no policy option would also be neutral, given development plan policy, but again would miss the opportunity of delivering a better community asset provision in the village. It too would require alternative homes provision suited to older households elsewhere in the nearby area and the land provided for in Policy 2 meets that test.

| Neighbourhood Plan<br>SEA Objective | Policy | No Policy |
|-------------------------------------|--------|-----------|
| Historic Environment                | 0      | 0         |
| Designated<br>Environmental Sites   | 0      | 0         |
| Flood Risk                          | 0      | 0         |

#### **Policy 4 – Land at Ferringham Lane**

8.18 The policy identifies this existing industrial site is suited to housing development in the later part of the plan period if it becomes available. The site is inside the built up area boundary and has no effect on any designated nature asset. It lies within Flood Zone 1 and is not subject to groundwater flooding. Its redevelopment provides an opportunity to make a positive contribution to the setting of the Conservation Area and two listed buildings (Home Farm Cottage and Home Farm House/Lodge) and would remove possible ground contamination from the past industrial uses of the site. A future planning application must demonstrate the scheme design realises that opportunity or, at the very least, does not undermine the significance of the setting of the Conservation Area or the listed buildings.

8.19 There are no other sites that have been identified in the built up area offering this potential, other than those provided for in policies 2 and 3. The no policy option would result in the continuation of an industrial use that does not enhance the setting of the Conservation Area and that may have land contamination.

| Neighbourhood Plan<br>SEA Objective | Policy | No Policy |
|-------------------------------------|--------|-----------|
| Historic Environment                | +      | -         |
| Designated<br>Environmental Sites   | 0      | 0         |
| Flood Risk                          | 0      | 0         |

#### **Policy 5 – Sustainable Drainage Systems**

8.20 The policy proposes a prioritisation of measures within development proposals to reduce the risk of surface water flooding in the village. As such, it will have a positive effect on managing local flood risk. No policy may result in less attention being paid to these important flood risk management measures in the consideration of future planning applications.

| Neighbourhood Plan<br>SEA Objective | Policy | No Policy |
|-------------------------------------|--------|-----------|
| Historic Environment                | 0      | 0         |
| Designated<br>Environmental Sites   | 0      | 0         |
| Flood Risk                          | +      | -         |

### Policy 6 – Land North of Littlehampton Road

8.21 The policy seeks to manage development proposals in an especially sensitive landscape area between the built up area of the village and the National Park and Highdown Hill. This area contains sporadic residential, commercial, horticulture and equestrian development but provides an essentially unbroken setting to the Park and Hill. As such, the policy is intended to result in a positive environmental impact or at the very least a neutral impact on the designated nature and heritage assets of new development.

8.22 Without such a policy, then development management will rely on the generic policies of the development plan, which do not in themselves weigh the balance of economic and environmental policies in the way proposed in this policy. This may be to the detriment of seeking to protect the setting of these nationally important designated environmental assets.

| Neighbourhood Plan<br>SEA Objective | Policy | No Policy |
|-------------------------------------|--------|-----------|
| Historic Environment                | +      | -         |
| Designated<br>Environmental Sites   | +      | -         |
| Flood Risk                          | 0      | 0         |

### Policy 7 – Local Green Spaces

8.23 The policy proposes the designation of three Local Green Spaces in accordance with the criteria set out in the NPPF. Each of the proposed spaces is an important open space and recreational asset and contributes to the setting of listed buildings and the Ferring Conservation Area. No policy in this respect will have a neutral impact as the development plan contains policies for the protection of urban open spaces.

| Neighbourhood Plan<br>SEA Objective | Policy | No Policy |
|-------------------------------------|--------|-----------|
| Historic Environment                | +      | 0         |
| Designated<br>Environmental Sites   | +      | 0         |
| Flood Risk                          | 0      | 0         |

### Policy 8 – Village Centres

8.24 The policy seeks to retain the vitality and viability of the two small retail centres in the village. Each centre contains a number of buildings or structures of character and the proposed Ferring Village Centre coincides with the Ferring Conservation Area. As such, the policy will have a positive impact on the historic environment by encouraging investment in local retail and services businesses and their premises.

8.25 Not having a policy will have a neutral impact overall but it is possible that the generic development plan policies may not be as effective at managing development proposals in the village centres. Arguably, there is an alternative policy that would be more permissive and encourage greater flexibility in the use of village centre buildings. There is a danger in such a policy of harming the local heritage character of the centres and this has not been selected on that basis.

| Neighbourhood Plan<br>SEA Objective | Policy | No Policy | Alternative<br>Policy |
|-------------------------------------|--------|-----------|-----------------------|
| Historic Environment                | +      | 0         | -                     |
| Designated<br>Environmental Sites   | 0      | 0         | 0                     |
| Flood Risk                          | 0      | 0         | 0                     |

### Policy 9 – Ferring Community Centre

8.26 The policy is a centrepiece and driver of the Neighbourhood Plan. It proposes the redevelopment of existing community assets that adjoin the Ferring Conservation Area boundary on the one side and the proposed The Glebelands Local Green Space on the other. The site is inside the built up area boundary of the village and lies within Flood Zone 1.

8.27 The design and form of the existing building do not make a positive contribution to either of these assets as they are not characteristic of the predominant vernacular of the Conservation Area and are stark in their appearance from the Glebelands. Though the purpose of the policy is to provide a significant improvement in community infrastructure, a new building will also have an environmental benefit in replacing the building with a design that contributes more to the character of the local area.

8.28 A new facility will be designed to achieve a standard that addresses these environmental impacts, as well as the greater issue of delivering long term sustainable community facilities. Not having this policy will have a neutral environmental impact. There were no alternative sites considered for a new community facility as the current Glebelands facilities were an important part of the combined proposals. They are well located at the centre of the village.

| Neighbourhood Plan<br>SEA Objective | Policy | No Policy |
|-------------------------------------|--------|-----------|
| Historic Environment                | +      | 0         |
| Designated<br>Environmental Sites   | +      | 0         |
| Flood Risk                          | 0      | 0         |

### Policy 10 – Allotments

8.29 The policy requires the re-provision of the existing Henty Arms allotments prior to the redevelopment of the site as proposed in Policy 2. The policy will therefore have a positive social impact in enabling the delivery of a larger allotment with better facilities to meet local demand over the plan period. Not having a policy will increase the risk that alternative provision will not be identified and the other provisions of the Neighbourhood Plan may be hindered. In both cases, however, there is no environmental effect.

| Neighbourhood Plan<br>SEA Objective | Policy | No Policy |
|-------------------------------------|--------|-----------|
| Historic Environment                | 0      | 0         |
| Designated<br>Environmental Sites   | 0      | 0         |
| Flood Risk                          | 0      | 0         |

## **9. An outline of the reasons for selecting the alternatives dealt with**

9.1 The policy options chosen in the Neighbourhood Plan have been assessed as those that achieved an appropriate balance between avoiding any significant environmental impact and meeting the strategic objectives of the Neighbourhood Plan, compared to the alternatives.

9.2 All the policies have sought to protect and enhance the surrounding natural assets of the village and its own heritage assets. The locational decisions have been driven by achieving a significant community benefit outcome, the like of which may simply not have been possible without a combination of the Neighbourhood Plan and the Orders.

9.3 Where necessary, the policies have ensured that key development principles are secured at the outset, leaving the saved policies of the development plan to ensure subsequent planning applications will provide the detail to assess impact at a finer grain than possible in this assessment. The emerging replacement Local Plan will replace and update those saved policies once adopted.

9.4 In more general terms, the Neighbourhood Plan supports at most 50 homes over the plan period, in addition to windfall schemes. This number of homes represents a very small addition to the existing housing stock to the extent that no material impacts on transport, air quality or water quality for example can be measured or compared.

9.5 The assessment indicates there are no significant environmental effects of the Plan. Those minor environmental effects of the Neighbourhood Plan will be addressed as identified above.

## **10. A description of measures envisaged concerning monitoring**

10.1 The Neighbourhood Plan proposes that the progress in its implementation will be assessed using the measures identified for each of its strategic objectives. These may be reported in the Arun and South Downs National Park monitoring reports in due course and the Parish Council will seek to agree suitable arrangements with the two planning authorities. Similarly, its progress in respect of its SEA objectives may be assessed and reported in the same way.

## Annex A – Evidence Base

The list below contains all those documents collected and reviewed in the process of preparing this report. All are available to view via the Ferring Parish Council website's neighbourhood plan pages.

- Community Profile for Ferring Parish (2012)
- Ferring Community Event Notes (2012)
- Ferring NP Housing Group Report (2012)
- Ferring NP Environment Group Report (2012)
- Ferring NP Drainage Group Report (2012)
- Ferring NP Heritage Asset Review (2013)
- Ferring SHLAA (2012)
- Ferring NDP Community Survey (2012)
- Ferring Parish Plan (2005)
- Arun Note on 5 Year Housing Supply (2012)
- Arun Locally Generated Housing Needs Survey (2010)
- Arun Affordable Housing Options Viability Study Update (2010)
- Arun Employment & Economic Land Assessment (2010)
- Arun District Shopping Centre Survey (2006)
- Arun Settlement Sustainability Study (2007)
- Arun Infrastructure & Funding Study (2009)
- Arun District Strategic Transport Study (2006)
- Arun Strategic Flood Risk Assessment (2008)
- Arun Landscape Study (2006)
- Arun PPG17 Assessment (2009)
- Arun Green Infrastructure Study (2012)
- Arun Local Plan (2003)
- Arun Proposed Submission Local Plan (2013)
- Arun Intended Full Sustainability Appraisal (2013)
- Arun Habitats Regulations Assessment (2013)
- Arun Habitat Survey (2008)
- Economic Impact of Tourism in Arun (2008)
- Arun District Council Sustainability Framework (2013)
- Arun Core Strategy Habitats Assessment (2010)
- Arun Economic Strategy (2009)
- South Downs National Park Local Plan: Options Consultation (2014)
- South Downs National Park Housing Requirements (2011)
- South Downs Landscape Character Assessment (2011)
- West Sussex Strategic Housing Market Assessment: Arun (May 2009)
- West Sussex Local Transport Plan 2011-26
- A Revision of the Ancient Woodland Inventory for West Sussex (2010)