

HDCB/Issue 8

**STATEMENT BY
HORSHAM DISTRICT AND
CRAWLEY BOROUGH COUNCILS**

ISSUE 8

**Sustainability Appraisal and Strategic Environmental
Assessment**

**HORSHAM DISTRICT AND CRAWLEY BOROUGH LOCAL
DEVELOPMENT FRAMEWORKS**

**WEST OF BEWBUSH JOINT AREA ACTION PLAN DEVELOPMENT
PLAN DOCUMENT**

JANUARY 2009



ISSUE 8: Sustainability Appraisal and Strategic Environmental Assessment

1. Introduction

- 1.1 This Statement relates to Issue 8 and the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA), of the West of Bewbush Joint Area Action Plan (JAAP), in terms of its processes, outcomes and specific wording issues.
- 1.2 A number of issues relating to the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) were raised in the original representations on the submission JAAP. Subsequently, the Inspector has identified main matters and questions for Examination in relation to this document.

2. Main Matters

- 2.1 With regard to the SA/SEA one key question has been raised in the Inspector's Issues for Examination. Fundamentally, the Inspector asks **'Whether it forms an adequate basis for the assessment of alternatives and the choice of the JAAP option'**. This section sets out the Councils' response in relation to this issue, together with a reply to a further question by the Inspector concerning a point of detail in the SA/SEA report.
- 2.2 In undertaking the SA/SEA of the Joint Area Action Plan, the Councils have adhered to the legislative requirements and government guidance that set the framework in which the process of SA/SEA is undertaken. The key documents referred to by the Councils are: CDNat12: "The Environmental Assessment of Plans and Programmes Regulations 2004", (usually referred to as the SEA regulations), PPS12 (CDNat6a), and the Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (CDNat11).
- 2.3 The legislation and guidance governing SA/SEA requires that the impacts of a plan, together with a range of alternatives are tested against a range of social, environmental and economic (i.e. sustainability) objectives. It is, however, recognised that it is unlikely for it to be appropriate for every alternative that is identified to be tested against the sustainability objectives and that only reasonable alternatives need to be considered. The Councils referred to both legislation and guidance when considering which alternatives could be considered to be reasonable. (CDNat12, Part 3 section 12(2)b, and CDNat11 paragraph 3.310 and Appendix 11),
- 2.4 When identifying possible JAAP options, it was recognised by both Councils that the results of the SA/SEA process would be more effective and informative in aiding the decision making process if solely the most realistic alternatives were tested as part of the SA/SEA process. The Councils used the guidance referred to in paragraph 2.3 above to help to determine which options could be considered 'reasonable' and therefore appropriate for

consideration as part of the SA/SEA process. The reasoning as to why certain options were selected or excluded from further consideration is set out in section 7.1 of CDHDCB18. It is, however, considered that it may be helpful to provide some further clarification on the option development process, and these are addressed in paragraphs 2.6-2.10.

- 2.5 It should be noted that the sustainability appraisal is integral to the preparation of a DPD, and that as a consequence planning and sustainability issues become closely intertwined, and cannot always be clearly separated. For example, planning issues (such as the requirements of the Core Strategy) will influence the options selected for assessment as part of the sustainability appraisal process, but equally sustainability considerations such as the impact of a proposed development on nature conservation or air pollution would influence a location selected for inclusion in a DPD.

Higher Level Plans and Policies

- 2.6 As set out in Chapter Seven of the SA/SEA one of the key reasons for eliminating options from further consideration are higher level plans or programmes that preclude approaches that would conflict with the requirements of the higher level plan. In the case of the JAAP, two key higher level plans are the Horsham District and Crawley Borough Core Strategies. Both these documents have been found sound at their respective Examinations, and are now adopted forming the policy framework for the two authorities. As a consequence the options identified for consideration as part of the SA/SEA of the JAAP must accord with the requirements of the Core Strategies. Three of the main constraints to the JAAP options that stem from the Core Strategies are:

- *The area of search* – both Core Strategies identify that development to the West of Crawley should be within the defined area of search.
- *The size of development* – the Core Strategies state that development in the West of Crawley area should be for around 2,500 homes. Options for a development of, for example, 200 or 10,000 homes would not therefore be a realistic alternative.
- *A neighbourhood development* – As set out in Chapter Seven of CDHDCB18, the Core Strategies state that development to be constructed on a neighbourhood basis, thus limiting options as to the ‘style’ of the development.

Strategic Level of the Option

- 2.7 As stated in Chapter Seven of the SA/SEA, options need to be appropriate to the level of the plan (i.e. the JAAP). Therefore, precise locational options such as the exact location of a school / community centre / sports pitch is more appropriate a masterplan level document. It was, however, felt that it would be appropriate to consider what types of facilities should be provided – e.g. a cemetery or sewage treatment facilities.

Baseline Data and Background Studies

- 2.8 A key part of the SA/SEA process was the collection and interpretation of baseline / background data in relation to the west of Crawley area of search. This helped to inform the identification of sustainability issues and the development of the different plan options.
- 2.9 As an example, environmental and landscape data was collected for the area of search. This information limited the options as to where development could be located due to physical constraints such as the River Mole floodplain, nature conservation designations and noise contours from Gatwick Airport. The possible development areas were then further limited as other background studies were completed. For example CDHDCB35 identified land within the area of search that was of a high landscape quality and therefore unsuited to development. As a result the location as to where development could be reasonably located was limited to the West of Bewbush or West of Ifield areas.

Consultation

- 2.10 The SA/SEA was undertaken in conjunction with the preparation of the JAAP, and stakeholders were given the opportunity to comment on the preliminary options set out in the Scoping Report, and the more detailed options set out in the draft final SA/SEA that was published alongside the Preferred Options documentation. Very few specific comments were made on the options set out in the SA/SEA, and the Councils therefore concluded that there were no major objections to the options put forward for consideration as part of the SA/SEA process. Amendments to the options were however made following the Preferred Options consultation in light of wider 'planning' responses, for example if new evidence was presented. These amendments were however made in light of the issues that have been set out in the preceding paragraphs.

The numbering of the options in Appendix B of the SA appears to be incorrect. If so, should it be corrected?

- 2.11 In addition to the more general issues raised by the Inspector, it was noted that Appendix B contains a number of formatting errors relating to the ordering of the different options that were tested during the sustainability appraisal process. These errors were purely typographical in nature and do not present any material problems to the Sustainability Appraisal process, with no sites being incorrectly appraised. These errors will be corrected prior to the publication of the adopted JAAP and associated documentation as appropriate.

3.0 Responses to the matters raised by original representations

- 3.1 As stated in paragraph 2.10, very few representations were made directly relating to the SA/SEA. Some of the representations received on the JAAP did however have implications for the SA/SEA; in particular those suggesting

alternative development sites to the West of Bewbush strategic location put forward for development by the Councils.

- 3.2 On the basis of the evidence set out in paragraphs 2.6 to 2.10, the Councils do not consider that the alternative sites put forward in the representations can be considered to be ‘reasonable’ alternatives, and were not therefore subjected to the sustainability appraisal process. The initial reasoning as to why the process was not undertaken was set out in part in the Alternative Sites and Sustainability Appraisals document that was discussed at the Pre-Hearing Meeting. This table has now been updated taking into account the evidence set out in this document together with any further SA/SEA documentation received by objectors. A map showing the locations of the sites assessed by the Councils as part of the Sustainability Appraisal process is now available on the Examination Statements page: www.westofcrawley.gov.uk/exam_statements.html. The location of the Alternative Development Sites can be viewed in CDHDCB21.

Table One: SA/SEA of Alternative Development Sites

Site	Extent of SA/SEA Assessment (by HDC/CBC) to date	Reasoning for the Council’s exclusion of all / part of the site from the SA/SEA process.
ADS1: West of Bewbush Alternative Boundary 1	The easternmost part of the site was assessed as part of the West of Bewbush option, but the westernmost portion of the site was not assessed.	The westernmost portion of the site suggested was not considered as it lies outside the area of search defined in the Core Strategies.
ADS2: West of Bewbush Alternative Boundary 2	The entire site was assessed as part of the SA/SEA of the West of Bewbush option, but the alternative of bringing forward development excluding the Kilnwood Historical Parkscape was not considered.	The alternative option was not considered as the Kilnwood land is needed to bring forward a neighbourhood of 2,500 homes. In addition, the baseline evidence does not show that the land was of sufficient historical importance to warrant excluding the land from consideration as part of the SA/SEA process.
ADS4: Renewable CHP Scheme	Land not assessed by HDC/CBC, but a sustainability appraisal has been submitted to the Inspector by KTI energy Ltd. The Councils do not consider the information in this document to be of a nature that could be incorporated into the SA/SEA. (See CDOth6)	The Council’s did not consider this site process as the precise land area for the development was not submitted to the Councils prior to submission. Furthermore, the site is not considered to be a ‘reasonable’ option as the land lies outside the area of search identified within the Core Strategies.
ADS5: Ifield Golf Course	The site was assessed as part of the wider ‘West of Ifield’ development area, (option b) and as part of option c. The land was not however considered as a discrete option.	The site was not considered to be a reasonable option, as development of the golf course alone would not be of a sufficient size to bring about the neighbourhood development of

		2,500 homes as is required by the Horsham and Crawley Core Strategies.
ADS6: Ifield Golf Course	As for ADS5 above.	As for ADS5 above
ADS7: Ifield Golf Course and surrounding land	The golf course and land immediately to the north as far as the floodplain were considered as part the west of Ifield option, but the alternative suggested, including land to the west and south of the golf course was not considered by the Councils.	The baseline data collected by the Council as part of the SA/SEA and wider planning processes resulted in the exclusion of some of the land suggested as an alternative as it was not found to be suitable in environmental or landscape terms. (see CDHDCB35). The land that remained was not considered to be a reasonable option, as it would not be of a sufficient size to bring about the neighbourhood development of 2,500 homes as is required by the Horsham and Crawley Core Strategies.
ADS8A: Land West of Ifield ¹	Some of the land suggested as an alternative site was assessed as part of the SA/SEA process. It includes land north of Rusper Road as far as the floodplain and eastward to the edge of the area of search.	The baseline data collected by the Council as part of the SA/SEA and wider planning processes resulted in the exclusion of some of the land suggested as it was not found to be suitable in environmental or landscape terms. Constraints included aircraft noise, flooding and historic / landscape sensitivities.
ADS8B: Ifield Golf Course ¹	As for ADS5 above.	As for ADS5 above
ADS9: Land adjoining Bonnets Lane, Ifield ²	No SA/SEA of the site has been undertaken	Site was not considered to be a 'reasonable' alternative as the land does meet the requirements for development identified in the Core Strategies and is subject to environmental constraints. It is of insufficient size to accommodate 2,500 homes and is subject to aircraft noise constraints.

¹ These sites have now been withdrawn, but are included in the table for completeness

² The developers have stated that they will not be undertaking an SA of this site, but the explanation here is included for completeness

4 Proposed changes to the SA/SEA and/or JAAP

4.1 The Councils considered that in order for the SA/SEA process to be effective, only the most appropriate options should be selected for consideration. In doing so, decision makers would be presented with a concise and relevant report to help guide their decisions when selecting options for inclusion in the JAAP.

- 4.2 As set out in this statement, the Councils have selected options based on their 'reasonableness' and consider that the other alternatives that have been suggested do not meet the necessary standards to be assessed as an alternative as part of an SA/SEA. The view of the Councils is therefore that there is no requirement for any of the suggested alternatives to be given further consideration as part of the SA/SEA process or be incorporated into the Councils' SA/SEA.
- 4.3 It is however felt that there may be some benefit in expanding the introductory paragraphs of Chapter Seven of the SA/SEA, thus improving the transparency of the SA/SEA process. It is suggested to the Inspector that a means of achieving this would be to incorporate the information set out in paragraphs 2.5 to 2.9 of this document into the relevant sections of the section 7.1 of the SA/SEA. In addition to this change it is also proposed that the map showing the location of the options considered by the Councils is incorporated into the final SA/SEA together in the contents of Table Two.
- 4.4 In addition to the changes suggested above and in paragraph 2.11, it is acknowledged that some additional (minor) modifications to the SA may be necessary as a consequence of changes made to the JAAP in light of the Inspector's Report. These changes will be made as necessary, prior to the adoption and publication of the Adopted JAAP and associated Sustainability Appraisal.

5 Conclusion

- 5.1 This statement sets out how Horsham and Crawley Councils identified options for consideration as part of the SA/SEA process. It sets out how the Councils selected 'reasonable' alternatives that for example accord with the requirements of higher level plans, and avoid environmental constraints. In taking this approach it is considered that the Councils were able to undertake transparent, detailed and sustainable focus on the reasonable options and thus undertake an effective Sustainability Appraisal and produce a report to assist decision makers (sustainability is not the sole consideration: CDNat11 p126) in selecting options for inclusion in the JAAP. The SA is therefore felt to form an adequate basis for the assessment of alternatives and the JAAP option selected.