

Bramber Neighbourhood Plan

**Pre-Submission (Regulation 14) Consultation Draft
Sustainability Statement**

August 2019

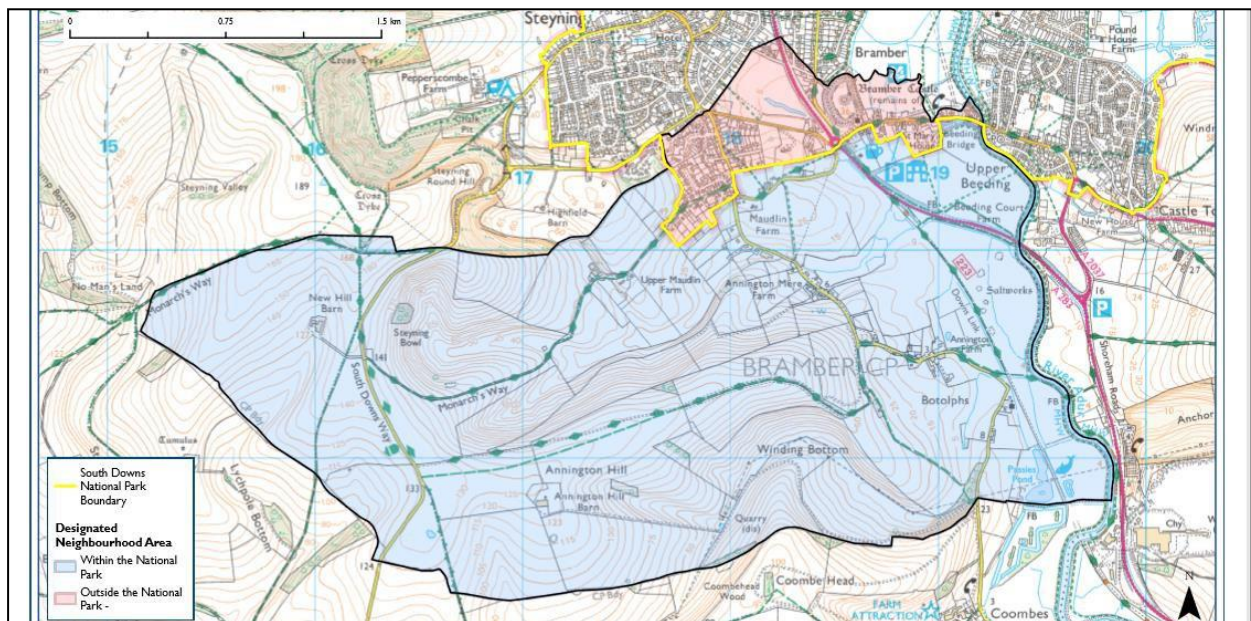
1. Introduction

- 1.1. This Sustainability Statement has been prepared to support the Bramber Neighbourhood Plan ('the Plan'). It demonstrates how the Plan contributes towards the achievement of sustainable development.
- 1.2. Sustainable development is about ensuring a better quality of life for everyone, now and for generations to come. It is about considering the long-term environmental, social and economic issues and impacts in an integrated and balanced way. The UK Government has set five guiding principles to achieve the sustainable development purpose. These principles form the basis for policy in the UK and are as follows:
 - Living within environmental limits
 - Ensuring a strong, healthy and just society
 - Building a strong, stable and sustainable economy
 - Promoting good governance
 - Using sound science responsibly
- 1.3. One of the means by which sustainable development can be achieved is through the land-use planning process. The Plan can help to achieve sustainable development as it aims to ensure that development meets the needs of people living and working in the Neighbourhood Area, while at the same time helping to ensure that adverse environmental impacts are minimised.

The Plan

- 1.4. The designated Neighbourhood Plan Area - contiguous with the parish boundary - is shown in Figure 1.1.

Figure 1.1: Bramber Neighbourhood Area



The Plan has been developed by members of the Plan Steering Group following an extensive programme of engagement with the local community. The Plan's vision for development of the area up to 2031 is as follows:

“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”.

1.5. To deliver the vision, the Plan sets out 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.

Policy context

- 1.6. The Plan has been prepared having regard to national policy and to be in general conformity with the strategic policies of the local development plans. At the national level, the National Planning Policy Framework (NPPF) establishes the scope and purpose of neighbourhood plans. At the local level, the development plan comprises the Horsham District Planning Framework (HDPF) and the South Downs Local Plan (SDLP).

Strategic Environmental Assessment and Habitats Regulations Assessment

- 1.7. Horsham District Council (HDC) is the lead authority for Bramber's Neighbourhood Plan. It has issued a 'standard' screening for all neighbourhood plans within the district. This states that if a neighbourhood plan is allocating sites for development then it could have a significant environmental impact, therefore a Strategic Environmental Assessment (SEA) is required. The Bramber Neighbourhood Plan does not allocate sites and it has been confirmed by HDC that an SEA is not required. A Scoping Report has been developed and consulted on, however, to determine the sustainability criteria against which the Neighbourhood Plan should be assessed, to ensure that it contributes to the achievement of sustainable development. This has provided the context for this Sustainability Statement.
- 1.8. Separately, a screening opinion in respect of Habitats Regulations Assessment (HRA) determined that an HRA is not required. This was subject to consultation with relevant stakeholders including Natural England, who concurred with the conclusion that there would be no likely significant effect on European sites.

2. Sustainability Assessment

2.1 In order to demonstrate that the Plan contributes to the achievement of sustainable development, a Sustainability Framework has been developed to assess the social, economic and environmental effects of the Plan through the identification of objectives and indicators.

2.2 The sustainability objectives and indicators have emerged through the following considerations:

- Through the review of relevant Plans and Programmes (Section 3 of the Scoping Report)
- Issues identified in the Baseline section (Section 4 of the Scoping Report)
- To help address sustainability issues known locally
- To help address the ‘weaknesses’ outlined in the SWOT analysis (Section 5 of the Scoping Report)

2.3 The Sustainability Framework is shown in Table 6.1:

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.

Sustainability theme	Objectives	Criteria
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.
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.

Sustainability theme	Objectives	Criteria
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.
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.

2.1 The qualitative scoring system used to assess the likely effects is shown below:

++	The policy is likely to contribute significantly towards the sustainability objective
+	The policy is likely to contribute positively towards the sustainability objective, although not significantly
0	The policy is considered to have no significant positive or negative effect
-	The policy is likely to detract from the achievement of the sustainability objective, although not significantly
--	The policy is likely to detract significantly from the achievement of the sustainability objective
?	The policy has an uncertain relationship to the sustainability objective. Alternatively, insufficient information may be available to enable an assessment to be made.

2.2 Table 2.1 shows the assessment of each policy against the sustainability framework, with commentary, including potential alternatives that have been considered, and provides a commentary.

2.3 Table 2.1 shows that all of the policies in the Plan will either have no significant effect (positive or negative), a positive effect or a significant positive effect.

Table 2.1: Assessment of policies in the Bramber Neighbourhood Plan against Sustainability Appraisal Objectives

Assessment of Neighbourhood Plan policy options										
Policy B1 – Location of development										
Policy Options:										
Option A: To have an NP policy that broadly directs where the bulk of development will be located.										
Option B: To have no NP policy, covered by HDPF Policies 3, 4 and 27.										
Option C: To allocate sites for development within the neighbourhood plan.										
Policy options	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape	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
A	+	+	+	+	+	0	0	0	0	+
B	-	-	-	+	0	0	0	0	0	0
C	-	-	-	+						
Preferred Policy Option:				A						
Summary and conclusion:										
<p>Option A reinforces the existing Built Up Area Boundary, which will ensure that development continues to be directed to the most appropriate parts of the parish, i.e. those areas where potential negative impacts on factors including landscape, character and biodiversity, are least. This also minimises the risk of coalescence with neighbouring settlements.</p> <p>This option enables greater use of sustainable transport methods, by focussing development in already built up areas, which could in turn lessen the impact of car transport reliance, which has been raised as a concern locally.</p> <p>Option A is felt to be more sustainable than Option B as it specifically reinforces the existing boundaries and also encourages development away from greenfield and towards brownfield where possible.</p> <p>Option C would have enabled a contribution toward the local housing need (and wider strategic need), however only two sites emerged through the Local Call for Sites, and both were assessed as not suitable for development. Detail on the housing need and potential sites can be found in the Housing Report incorporating site assessment.</p> <p>A summary of the site assessments is provided below, including a commentary about how it impacts on the Sustainability Framework.</p>										

Clays Field										Summary of appraisal
Sustainability Objectives										
1	2	3	4	5	6	7	8	9	10	
-	-	-	++	0	0	0	+	0	-	<p>The site could deliver dwellings that would address locally defined needs of Bramber parish. It would also enable the safeguarding of the remainder of the site, which would be gifted to the community.</p> <p>However, the site assessment undertaken for the Neighbourhood Plan finds that the site is located outside (although adjacent to) the Built Up Area Boundary. Castle Lane can be dated at least to medieval times, when it would have been a thoroughfare for Castle related ‘movement’. The lane is distinct from neighbouring roads in its character and any works – which might include widening it, adding kerbs, streetlights and defined pedestrian routes – would significantly change the nature of the lane and the opportunity to look at it and imagine its historical beginnings.</p> <p>The landscape capacity for this site has been judged as low by HDC in their most recent Landscape Capacity Report. The site (particularly to the north) being visible from the South Downs and the field taken as a whole provides a vital inter-settlement gap between Bramber and Steyning. This distinction serves to provide each settlement with its own character and identity. The field has historically played this role, when taken together with Bramber Castle, and any filling in with development could be seen to change the rural, open perception of this area of the parish.</p> <p>The field has a history of, and continues to be, well-used and valued by the local community. It provides a valuable asset that contributes to the health and well-being derived from access to open space and green infrastructure, as expressed in paragraphs 96 to 101 of the NPPF: “Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of</p>

Clays Field										Summary of appraisal
Sustainability Objectives										
1	2	3	4	5	6	7	8	9	10	
										<p>communities". Access to high quality open space is considered to be important to the health and well-being of the community especially if a similar sized accessible open space is not readily available close by.</p> <p>The HDC SHELAA assessment of the site (December 2018) concluded that the site is 'Not Currently Developable' and the assessment concurs with this.</p>
Land south of Kingsmead Close										
--	-	--	+	0	0	0	0	0	-	

Clays Field										Summary of appraisal
Sustainability Objectives										
1	2	3	4	5	6	7	8	9	10	
										<p>The Built Up Area Boundary has been marked to exclude this site, for the value of the reasons given above. The site is clearly visible from the South Downs.</p> <p>The SDNP has carefully considered where housing can most sustainably be delivered and there is no requirement for Bramber to bring forward housing. This site is one that could make a small contribution to the housing requirement of Bramber parish as a whole. However, when the policies laid down in the South Downs Local Plan are considered its viability is questionable. Given the reasons for refusal of previous applications for fewer, albeit larger dwellings, and the fact that the new SDNP policies, if anything, strengthen support for them and the fact that there is no allocation for Bramber it is recommended this site is not included in the plan.</p> <p>Taking into account the information set out above, the site is considered not suitable for development.</p>

Assessment of Neighbourhood Plan policy options

Policy B2 – Character of development

Policy Options:

Option A: To have an NP policy that identifies the distinct character areas within the parish to ensure that development is sympathetic to them.

Option B: To have no NP policy, rather to rely on the broader character policy content contained in the HDPF and SDLP, for instance HDPF policies 32 and 33.

Policy Options	1/Env – Natural	2/Env – Biodiversity	3/Env – Landscape	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
A	0	0	+	0	0	+	0	0	0	0
B	0	0	+	0	0	+	0	0	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
<p>In a parish such as Bramber, it is important that development is deigned in a way that is in-keeping with the local character. Whilst the policies at the HDC/SDNPA provide a broad context for local character, Option A enables Bramber to set this out at a local level, with greater detail of the different character areas that exist in the parish. This in turn will lead to the improved achievement of sustainability.</p>										

Assessment of Neighbourhood Plan policy options										
Policy B3 – Design of development										
Policy Options:										
Option A: To have an NP policy that identifies the key considerations in designing quality development in Bramber.										
Option B: To have no NP policy, rather to rely on the broader character policy content contained in the HDPF and SDLP.										
Policy Options	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
A	0	0	+	+	0	+	+	+	0	+
B	0	0	+	0	0	+	+	0	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
<p>Whilst the HDPF and SDLP include policies about design, Option A enables greater detail, locally specific to Bramber, to be applied. For instance, the inclusion of this policy will support the delivery of better connected walking and cycling routes in Bramber as well as enabling greater access to open space for residents. This will lead to higher quality design and greater community cohesion. There are no anticipated negative sustainability impacts expected to result from this policy. Having a local policy emphasises that good design is key in achieving social, environmental and economic aims.</p>										

Assessment of Neighbourhood Plan policy options										
Policy B4 – Energy efficiency										
Policy Options:										
Option A: To have an NP policy that identifies the key considerations in designing development that maximises energy efficiency.										
Option B: To have no NP policy, rather to rely on the broader policy content contained in the HDPF and SDLP.										
Policy Options	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape	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
A	+	0	0	0	0	+	+	+	0	0
B	+	0	0	0	0	0	0	0	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
Including a specific policy on energy efficiency actively encourages developments to maximise energy efficiency through a range of actions in respect of zero carbon technologies. It also encourages development to minimise waste through the development of more energy efficient buildings, e.g. incorporating grey water systems. The policy also makes reference to the potential to retrofit historic buildings, which is particularly relevant in Bramber.										

Assessment of Neighbourhood Plan policy options										
Policy B5 – Protecting flora and fauna										
Policy Options:										
Option A: To have an NP policy that identifies key natural features within the parish, to conserve and enhance them.										
Option B: To have no NP policy, rather to rely on the broader policy content contained in the HDPF and SDLP.										
Policy Options	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape	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
A	+	+	+	0	0	0	+	0	0	0
B	+	+	+	0	0	0	0	0	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
The inclusion of a policy enables the distinctive features of Bramber parish in particular to be detailed, according to the value, in order to ensure that development not only preserve these natural assets, but also seeks to contribute to net gain in biodiversity. Natural features also contribute positively to the mental health and well-being of the local community. The policy, by way of being more locally distinctive than the detail included in the strategic policies of the HDPF/SDLP, enables greater contribution to the delivery of sustainable development.										

Assessment of Neighbourhood Plan policy options										
Policy B6 – Green Infrastructure										
Policy Options:										
Option A: To have an NP policy that identifies key natural features within the parish, to conserve and enhance them.										
Option B: To have no NP policy, rather to rely on the broader policy content contained in the HDPF and SDLP.										
Policy Options	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape	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
A	+	+	+	0	0	0	0	0	0	0
B	+	+	+	0	0	0	0	0	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
The NPPF encourages plans to set out the green infrastructure that contributes positively to biodiversity and geodiversity. The policy has mapped out the assets within Bramber parish, to encourage their retention and improved connectivity.										

Assessment of Neighbourhood Plan policy options										
Policy B7 – Protection and maintenance of Local Green Spaces										
Policy Options:										
Option A: To have an NP policy that identifies Clays Field as a Local Green Space. Option B: To not include Clays Field as a Local Green Space										
Policy Options	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape	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
A	+	+	+	0	0	0	+	+	0	0
B	-	-	-	0	0	0	0	0	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
<p>The policy seeks to safeguard Clays Field, valued Local Green Space that meets the requirements of the NPPF. This space would not otherwise be protected. It provides a recreational asset in the parish and has important historical considerations, including its role as part of the setting of Bramber Castle and a natural buffer between the two settlements of Bramber and Steyning. This includes a pond and mature trees and as such provides both a habitat and important wildlife corridor/stepping stone within the green infrastructure network. Whilst the site is beyond the BUAB, the need for housing across the district could add additional pressure for development here. This would negatively impact on each of the reasons provided to justify designating the space.</p>										

Assessment of Neighbourhood Plan policy options										
Policy B8 – Protecting the River Adur Corridor										
Policy Options:										
Option A: To include a policy that sets out additional local detail on how the River Corridor might contribute to recreational activities, without compromising its ecological value.										
Option B: To not include a policy, instead relying on HDPF 25 and SD17.										
Policy Options	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape	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
A	+	+	+	0	0	0	+	+	0	+
B	+	+	0	0	0	0	0	0	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
The River Adur Corridor has been identified as an under-utilised asset in the parish. The policy seeks to ensure that the green infrastructure associated with the Adur River Corridor is maintained and enhanced, for benefit of people – including residents and visitors - and wildlife, while improving access in a way that is compatible with protecting the river environment, for instance that will enable residents to walk, cycle or horse ride.										

Assessment of Neighbourhood Plan policy options										
Policy B9 – Protection of locally significant views										
Policy Options:										
Option A: To include a policy that sets out local view that are worthy of protection. Option B: To not include a policy, instead relying on HDPF 25 and SD6.										
Policy Options	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
A	+	0	+	0	0	0	0	0	+	0
B	+	0	0	0	0	0	0	0	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
Option A enables the community to identify a series of views that area particularly valued locally. This offers additional local detail to that included in the strategic planning documents, and contributes to preserving the character and landscape setting of the parish. The topography of the surrounding area means that there are some significant long distance views which define Bramber and which make it so popular with tourists and residents alike. Not including a policy could potentially lead to development that detrimentally impacts such views.										

Assessment of Neighbourhood Plan policy options										
Policy B10 – Encouraging sustainable movement										
Policy Options:										
Option A: To include a policy that sets out the key sustainable movement routes in the parish, to encourage non-car mode of transport, particularly for shorter journeys.										
Option B: To not include a policy, instead relying on HDPF 40 and SD49.										
Policy Options	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
A	+	0	0	0	0	0	+	0	+	+
B	+	0	0	0	0	0	+	0	0	+
Preferred Policy Option:				A						
Summary and conclusion:										
The inclusion of a policy enables the main routes at a very local level to be mapped and to ensure there is a safe environment for pedestrians and cyclists as well as motorists. The policy also makes reference to improvements to the PROW network that could enhance opportunities for safer and more sustainable modes of transport.										

Assessment of Neighbourhood Plan policy options										
Policy B11 – Public car parking										
Policy Options:										
Option A: To include a policy which safeguards against the loss of publicly accessible car parking in Bramber, and to alleviate against existing problems.										
Option B: To not include a policy, instead relying on HDPF 40 and SD49.										
Policy Options	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape	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
A	-	-	-	0	+	0	0	0	+	+
B	0	0	0	0	0	0	0	0	0	+
Preferred Policy Option:				A						
Summary and conclusion:										
<p>Bramber’s rural nature inevitably means that there is a greater reliance on car transport. Whilst policy B10 seeks to encourage greater non-car movements, the historic character of the parish, particularly around The Street and the Castle area, has resulted in a general lack of off-street parking, which is required for both residents and tourists to the area.</p> <p>This policy seeks to minimise the congestion causes by those vehicles in the parish, by safeguarding existing public car parking. In addition, by encouraging additional visitor parking at locations that have been identified in partnership with the SDNPA.</p> <p>The policy also seeks to enhance cycle provision and electric charging points at public parking areas.</p>										

Assessment of Neighbourhood Plan policy options										
Policy B12 – Residential car parking										
Policy Options:										
Option A: To include a policy which requires the provision of the minimum number of off-road parking spaces for new dwellings.										
Option B: To not include a policy, instead relying on HDPF 41 and SD22.										
Policy Options	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape	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
A	-	0	0	0	0	0	0	0	0	+
B	0	0	0	0	0	0	0	0	0	+
Preferred Policy Option:				A						
Summary and conclusion:										
<p>Because of the rural nature of Bramber, car ownership is well above average compared with the district and the south east. Historically, the style of buildings in Bramber have not lent themselves to off-road parking, which has increased traffic congestion as well as impacting negatively on the character of the area.</p> <p>By ensuring that the minimum numbers of car parking spaces are required, off-road, for new dwellings, the policy will address a social need and contribute towards improving the local streetscape setting of Bramber.</p> <p>Option A is assessed as more suitable than Option B as it is more locally specific.</p>										

Assessment of Neighbourhood Plan policy options										
Policy B13 – Community facilities at St Nicholas Church										
Policy Options:										
Option A: To include a policy which supports the upgrading of the church to provide additional community space										
Option B: To not include a policy, instead relying on generic strategic policies.										
Policy Options	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
A	0	0	0	0	0	0	0	+	0	0
B	0	0	0	0	0	0	0	+	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
Whilst the strategic policies contained in the HDPF and SDLP encourage the retention of community assets and the expansion or development of new ones, this policy seeks to add additional local detail. The policy includes specific clauses to mitigate negative impacts on transport generation and on the heritage asset itself.										

Assessment of Neighbourhood Plan policy options										
Policy B14 – Support the creation of an education centre at St Mary’s House and Gardens										
Policy Options:										
Option A: To include a policy which supports the creation of an education centre at St Mary’s House and Garden										
Option B: To not include a policy, instead relying on generic strategic policies.										
Policy Options	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
A	0	0	0	0	0	0	0	+	0	0
B	0	0	0	0	0	0	0	+	0	0
Preferred Policy Option:				A						
Summary and conclusion:										
Whilst the strategic policies contained in the HDPF and SDLP encourage the retention of community assets and the expansion or development of new ones, this policy seeks to add additional local detail. The policy includes specific clauses to mitigate negative impacts on transport generation and on the heritage asset itself.										

Assessment of Neighbourhood Plan policy options										
Policy B15 – Commercial premises and land										
Policy Options:										
Option A: To have an NP policy that seeks to protect against the loss of commercial premises or land which provides employment.										
Option B: To have no NP policy, instead relying on HDPF Policy 7/ SD34.										
Option C: To have an NP policy that seeks to allocate additional employment land.										
Policy Options	1/Env – Natural environment	2/Env – Biodiversity	3/Env – Landscape	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
A	0	0	0	0	+	0	0	0	0	+
B	0	0	0	0	+	0	0	0	0	0
C	-	-	-	0	+	0	0	0	0	+
Preferred Policy Option:				A						
Summary and conclusion:										
<p>Given Bramber’s proximity to larger employment bases nearby, including Worthing, Brighton and Horsham, it is important that existing local employment opportunities are particularly safeguard against loss or relocation. This is particularly the case in light of the new housing planned across the district, where local employment opportunities will help to reduce out-commuting and the negative environmental and social impacts associated with this. Option A provides positive economic sustainability by safeguarding existing sites, thus potentially creating fewer car movements to alternative sites outside the parish, as well as offering additional services locally, depending on the nature of the commercial activity.</p> <p>With Option B, whilst the HDPF/SDLP include broad employment policies, the HDPF specifically refers to neighbourhood plans to provide further detail at the parish level.</p> <p>Option C would support additional growth of employment land. No suitable sites, however, were submitted to the neighbourhood plan that would have enabled this option, therefore the NP could not allocate specific employment sites. This could be an area re-explored as part of an early review of the neighbourhood plan, to determine if new opportunities have arisen. This option would have positive impacts on the local economy, however allocating new sites for employment could be detrimental to the environment and landscape setting, depending on where those sites might be.</p> <p>There are no negative sustainability impacts predicted as a result of this policy.</p>										

3. Cumulative effects of Neighbourhood Plan policies

- 3.1. As well as assessing policies individually, it is important to explore the potential cumulative negative effects of policies taken collectively. A summary of the likely impacts of the policies is provided in Figure 3.1. The key areas where policies are likely to have negative cumulative implications are as follows:
- 3.2. **Increased traffic** - Any development will inevitably result in an increase in car traffic. Concentrating housing development within the existing Build Up Area Boundary, however, will ensure that development is located close to the existing public rights of way (Policy B10), which will enable residents to have easier access to local services and facilities by foot or cycle. This is further encouraged by the push for additional cycling facilities and electric charging points.. Policy B15 seeks to retain existing employment land, which will provide opportunities for residents to work locally, thus negating the need to travel longer distances beyond the boundary, potentially adding to traffic concerns. Whilst there is scope to seek additional employment sites, there were no suitable sites for this. This could however be revisited when the Neighbourhood Plan is reviewed.
- 3.3. **Impact on the countryside, landscape character and biodiversity** - There is a potential effect on the landscape with the proposals for additional visitor parking, and this will need to be undertaken in consultation with the SDNPA. The Plan is mindful of the need to protect the environment and Policies B5 to B9 set out a range of policies to safeguard local green infrastructure, views and key landscape features with a view to contributing to the character and biodiversity of the parish.

Figure 3.1: Cumulative impact of Neighbourhood Plan policies

Policy	Sustainability Objectives									
	1	2	3	4	5	6	7	8	9	10
B1	+	+	+	+	+					+
B2			++			++				
B3			++	+		++	+	+		+
B4	++					+	++	+		
B5	++	++	++				++			
B6	++	++	++							
B7	++	++	++				++	+		
B8	++	++	++				+	+		+
B9	++		++						+	
B10	++						++		+	++
B11	-	-	-		+				+	++
B12	-									++
B13								++		
B14								++		
B15					++					++

3.4. A Habitat Regulations Screen Assessment has been carried and Natural England responded:

“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”*

3.5. It is acknowledged that there are a number of uncertainties when considering the effects of the policies over the time scale of the Plan. The sustainability effect of the Neighbourhood Plan should therefore be monitored on a regular basis, against the Sustainability Framework, for both its positive and negative impacts.

4. Conclusion

- 4.1. This report, read in conjunction with the Scoping Report, presents an assessment of the contribution to sustainability made by the Bramber Neighbourhood Plan.
- 4.2. The Scoping Report was updated following consultation with statutory bodies and provides up-to-date baseline information about the parish and a detail of relevant plans and programmes and the implications of these for Bramber. This has enabled the development of a Sustainability Framework against which to examine the plan and its policies, including alternative options.
- 4.3. For some of the policies that could have a negative impact on the environment, there are other aspects that contribute positively to social or economic objectives. Moreover, other policies in the Neighbourhood Plan and District Plan should mitigate these negative environmental impacts.
- 4.4. Overall the most sustainable policy options have been chosen for inclusion in the Neighbourhood Plan when considered against reasonable alternatives.
- 4.5. None of the policies are likely to have any significant adverse effects, giving confidence that the Neighbourhood Plan will contribute to sustainable development.