

Clapham Neighbourhood Development Plan 2015 -2035



Strategic Environmental Assessment

May 2015

Strategic Environmental Assessment

1. Introduction

1.1 The purpose of this report is to provide an assessment of any significant environmental effects resulting from the policies and proposals of the Submission Neighbourhood Development Plan for Clapham ("the Neighbourhood Development Plan") in accordance with EU Directive 2001/42 on strategic environmental assessment (SEA).

1.2 The Neighbourhood Development Plan has been published for pre-submission consultation by Clapham Parish Council under the Neighbourhood Planning Regulations 2012, and as required by the South Downs National Park Authority, as the local planning authority.

1.3 The LPA determined that the Parish should be required to undertake a Strategic Environmental Assessment.

1.4 The SEA report of the Submission Neighbourhood Development Plan provides an assessment of the policy contents and seeks to do so in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts.

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 as the "Environmental Assessment of Plans or Programmes Regulations 2004" as follows:

- 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 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 aligned with the similar process of Sustainability Appraisal (SA) in the UK. During the preparation of the Neighbourhood Development Plan, the Government confirmed that an SA is not required of a Neighbourhood Development 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 Development Plan in a very 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 process began with the identification in the published 'State of the Parish' report of all the environmental assets in the Parish. This report was consulted upon with the local planning authority (LPA) as per the Directive. The LPA determined that the Parish should be required to undertake a Strategic Environmental Assessment on the following grounds:

- To ensure that sustainability is at the heart of the Clapham Neighbourhood Development Plan, that all reasonable alternatives are assessed, and that the most sustainable options are delivered in light of the sensitive landscape setting and heritage assets of the parish;
- As a precautionary measure, to ensure that the requirements of the SEA Directive are met, which is a key component of meeting the basic conditions against which a neighbourhood plan is examined; and
- To ensure the Plan has regard to National Planning Policy Framework and National Planning Practice Guidance.

It states that the following considerations apply:

- *the degree to which the plan or programme influences other plans and programmes including those in a hierarchy.* The proposal for housing in Clapham is inconsistent with the emerging housing requirement set out in the South Downs Local Plan. Although this is in draft and has not yet been approved by Members there is no current

intention to set a housing requirement for Clapham. It is also not the intention to identify the village in the Spatial Strategy or give it a Settlement Policy Boundary. The allocation of 30 homes in the CNDP will influence the desired outcome of the South Downs Local Plan and could result in cumulative impacts that were not envisaged in the development of the same. SDNPA's understanding of the present position is that this risk exists for Clapham NDP, particularly given a proposed allocation of 50 homes in neighbouring Findon in the emerging South Downs Local Plan.

- *the cumulative nature of the effects.* Referred to above; given the close proximity of an emerging requirement for 50 new homes in Findon in the South Downs Local Plan, an additional 30 homes being proposed in Clapham has the potential to have a detrimental impact on the special qualities of the National Park.
- the effects on areas or landscapes which have a recognised national, Community or international protection status. There is heightened sensitivity because of the recognised national landscape designation of the SDNP.

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

This section now assesses the potential environmental impacts of the housing allocation policy of the submission version of the Neighbourhood Development Plan. It responds to each of the SEA requirements in turn, beginning with a short description of the Neighbourhood Development Plan, identifying the key environmental features of the Parish and then assessing the impact of the strategic objectives and policies of the Neighbourhood Development Plan on those features, using a number of SEA objectives and measures.

3.1 The Neighbourhood Development Plan contains a number of policies for the use and development of land in the parish of Clapham in the plan period from 2015 to 2035. These policies, together with the policies of the Arun development plan - that is the saved policies of the 2003 Local Plan and those that will eventually replace them in the emerging South Downs National Park Local Plan - and the National Planning Policy Framework (NPPF), will be used by the local planning authority in determining planning applications should the Neighbourhood Development Plan be adopted in due course.

3.2 The Vision of the Neighbourhood Development Plan is:

In 2035 Clapham Parish will continue to be an attractive place to live. It will maintain its intrinsic rural character whilst allowing for sustainable development to ensure the health/survival of the school, shop/café, church and other such services.

The Parish will be connected to the wider South Downs National Park and its neighbours through a network of footpaths and cycleways. The local shop/café will flourish within the Parish (or very nearby), providing an important part of daily community life. Local businesses and those working from home will benefit from an enhanced broadband Internet service, with the ability to expand to local small start-up business premises.

3.3 The vision statement is underpinned by a clear set of strategic objectives that seek to make a positive contribution to sustainable growth within Clapham Parish, economically, environmentally and socially.

These strategic objectives should:

- Provide new residential development which complements the current character and cultural heritage of the village, and which is also sustainable in terms of the infrastructure of the village in general;
- Maintain an attractive mixture of green spaces and residential properties;
- Contain appropriate infrastructure, including health, transport and community facilities, to meet the needs of all in the community;
- Ensure new development does not increase flood risk to existing properties or land within the boundary of the parish or its immediate neighbours;
- Provide new housing which supports a variety of solutions to identified needs;
- Provide for a range of living, working and leisure needs;
- Maximise usage of green spaces in the area, ensuring they are well maintained and provide net gains in wildlife habitats

3.4 The Neighbourhood Development Plan sets out a range of housing, retail, traffic and community asset policies. Each of these policies is assessed in section 6 of the SEA below.

4. Key environmental aspects and the effect of not publishing a Neighbourhood Development Plan

4.1 The State of the Parish Report published in February 2015 identified the key features of the local environment. These are:

- The Parish lies within the South Downs National Park
- The Parish is a Biodiversity Opportunity Area according to the Sussex Biodiversity Partnership - stated aim to seek opportunities to make positive changes for biodiversity
- More than 30% of the Parish is designated ancient woodland
- Clapham Wood is a Site of Nature Conservation Importance
- The Parish has 14 listed buildings and one Conservation Area

Detailed environmental features

“The attraction of the village of Clapham is principally based on its geographical location at the foot of the South Downs and the attractive woodlands which surround it. Within the built-up area of the village and adjacent to it are green open spaces which provide a range of habitats and which link the village with the surrounding countryside ensuring that all residents are able to access Natural Greenspace” (Natural England 2010).

Although Clapham Common and much of Clapham Village is architecturally unprepossessing, it is still relatively quiet and unspoilt, mainly due to the fact that both parts of the village are accessed via culs-de-sac and thus there is no through traffic.

History

The first element of the name Clapham probably means 'hill', and the second may indicate early Saxon settlement. Clapham village consists of a single street climbing eastwards out of the valley and levelling out, with a drop to the south and a slight drop to the east of the settlement. The church and Clapham Farm are on rising ground a little to the north, but were probably once linked with the village; there are disturbances in the ground in that area, and the surviving network of paths might indicate former streets. There are several timber-framed buildings in the village, some of the 17th century, and some mid-19th-century flint and brick cottages built for the Norfolk estate. Council houses were built in Clapham in the 1920s and 1930s.

In the east part of the parish the settlement of Holt, called a vill in 1415, lay to the north of the modern Holt Farm. In the 13th century Holt had 21 proprietors, but land-holding was gradually consolidated in succeeding centuries, and after 1816 virtually the whole area was part of the Michelgrove estate. Holt Farmhouse is converted from three brick cottages dated 1851. Further north lie two timber-framed houses, one of which is 17th-century or earlier.

The parish is crossed at its southern end by the Chichester-Brighton road, the A27, which is of great antiquity. Another east-west road further north, however, was more important in the Middle Ages and later. Crossing the northern tongue of the main part of the parish from the east it proceeded to Michelgrove, turning south to climb Patching hill, and then west along the crest. During the 18th century the part between Michelgrove and the Findon boundary was under the control of the Shelleys, who from time to time closed it to the public, on one occasion levying a toll of one penny. In the early 19th century R.W.Walker of Michelgrove, attempting to set up a coach service from Littlehampton to London in opposition to the commercial one via Arundel, made a private turnpike road along the dry valley called Long Furlong to take advantage of the Worthing turnpike road. The castellated toll-house near the boundary between Clapham and Findon, which still survives, may have been built contemporaneously, or may have been converted from an existing lodge. The scheme was a failure, however, and in 1823 the Long Furlong road was incorporated in the public turnpike road between Findon and Littlehampton, Walker's right to the tolls on his section of the road being protected. At the same time the Michelgrove-Findon road was closed as a public carriage road. The Long Furlong road was dis-turnpiked in 1878.

Another north-south road, described as a public carriage-road in 1812, led through the hamlet of Holt towards Findon. Within the parish two tracks connected Clapham and Holt, one, a footpath to this day, leading east from the village street and the other, mentioned in 1415, leading from Clapham church along the south side of the modern Clapham Woods.

Thirteen inhabitants were enumerated in Clapham in 1086. Twenty inhabitants were taxed in 1296, and 31 in 1378. In 1524 19 inhabitants were assessed for subsidy. Forty-nine adult male inhabitants, excluding some of Michelgrove, were recorded in 1642. In 1676 there were 110 adults in the parish, and in 1724 21 families. The population was 197 in 1801, and thereafter rose, fluctuating around 250 for most of the 19th century and reaching a peak of 320 in 1961, despite the loss of the two detached parts [Michelgrove and Lee Farm] to other parishes. In 1971 the population was 264.

Cricket may have been played at Clapham in the late 18th century. An institute and reading room for Clapham and Patching was built in the village street by Mrs Joad of Dulaney House, Patching, c. 1882, but burnt down in 1973. A new building, in Patching, was opened c. 1975.

[from British History Online - corrected]

The Church of St Mary the Virgin was built in the 12th century, replacing an earlier Norman building. There are continuous records of the Rectors of Clapham from 1257, when William de Radenore was appointed; the parishes of Clapham and Patching were combined in 1875, and then joined with that of Findon in 1982. Although Clapham appears in the Domesday Book, the church itself is not mentioned; the earliest document which names the Church of the Blessed Virgin Mary at Clapham is dated 1405.

The church is small, with a plain exterior. It has a low-pitched roof on the tower; it used to have a spire, but this was removed in 1790. The church has undergone many changes over the centuries; you can just see the last remains of the older, Norman church in the walled-in window on the North side of the nave. The only remaining 12th-century structure is the South wall of the tower. The outside walls are 13th-century.

[From Clapham and Patching website, claphamandpatching.arun.gov.uk]

There are many prehistoric flint mines in the parish, as well as a number of Bronze Age barrows. In 2006 BBC's 'Time Team' did an archaeological dig on Blackpatch Hill, at the northernmost point of the parish, in order to investigate some of these and to try to identify two supposed Stone Age settlements which had originally been found by a young man called John Pull in 1922. Unfortunately the ground had been bulldozed and ploughed in more recent years, and no conclusive evidence of settlement could be found. (See http://www.wessexarch.co.uk/files/59465_Blackpatch%20Arundel.pdf)

In 1731 Sir John Shelley of Michelgrove granted a licence to Thomas Colebrook, a local brickmaker, to enclose one acre on Clapham Common and dig clay for making bricks and tiles, mainly for the purpose of supplying the Estate. This was the start of the Clapham Brick and Tile Works, which continued until 1978. In 1920 the Brick and Tile Works occupied some 8 acres of land bounded by the road on the South side.

A full history of Clapham, including the Brick and Tile Works, can be found in 'Bricks and Water - 100 Years of Social History in Clapham and Patching Villages'.



Map of the Village 1911

Habitats

The Sussex Biodiversity Partnership describes Clapham as a Biodiversity Opportunity Area lying on chalk, silt and sand along the southern edge. It supports diverse plant, bird and animal species including some whose population and range has rapidly declined in recent years (see Evidence Base - Sussex Biodiversity Centre - Desktop Biodiversity Report).

Within the built-up area of the village, despite development and in-filling, green spaces have been retained for community use. These support a range of habitats for wildlife and, most importantly, connect them and the countryside providing foraging lines for bats, shelter for small mammals and amphibians; they are also a great food source for insects and birds. In terms of the local human population all residents are readily able to access 'Natural Greenspace'.

Ancient Woodland

More than 30% of the Parish is designated ancient woodland (see Evidence Base). Clapham Wood is a Site of Nature Conservation Interest recorded by the Sussex Biodiversity Partnership as 'extensive ancient, semi-natural woodland with a rich ground flora including Sanical, Wild Strawberry and Early Purple Orchid. Tuberous Comfrey is also recorded from the site; it is a rare species in the county'.

Tree Preservation Orders

The Parish has six Tree Preservation Orders in place, one of which covers the whole of Clapham Woods (see Evidence Base).

Character and Heritage

The Parish contains just 130 households. The majority of these are in Clapham Village, a few on the Long Furlong and north of the Long Furlong at Long Furlong Farm, and the remainder in nearby Clapham Common. In addition there are four households east of the village in Holt Lane.

The village has a mixture of building styles – there are about 30 attractive houses over 100 years old, as well as more recent houses. Council houses were built in both Clapham and Clapham Common in the 1920s and 1930s. Additional houses (mainly bungalows or small houses, including the small developments of Clapham Close, Woodland Close and more recently Church Close) were mostly built in the second half of the 20th century.

The Ordnance Survey map for 1911 (see Evidence Base) shows a small settlement on either side of the road which leads to the church and Clapham Farm. The school and the Rectory are marked, as is the farm, but only a few dwellings are shown. In the majority of cases the buildings shown were built in the 16th and 17th centuries and most are Listed Grade II, being mainly thatched, timber-framed buildings with brick and flint infilling. The 18th and 19th centuries saw small additions to the village notably the Old Toll House, which has two round turrets and a castellated parapet, and three pairs of estate cottages built by the Duke of Norfolk's estate between 1846 and 1848, and each bearing a ducal coronet.

The Parish today is mainly spread along the single road which would be identifiable to a resident of 1911 (see photo montage in Evidence Base). The small development of around 24 properties at Clapham Common and the houses built at the entrance to the village are typical 1930's Council Houses with spacious plots but no parking spaces or garages.

The properties built at Clapham Close, Woodland Close and more recently Church Close were mostly built in the second half of the 20th century and reflect the designs of the time. They are mostly red brick chalet bungalows with garages and parking spaces and average sized plots. Very few of the design features prevalent in the older part of the village, such as flint, have been included in these newer properties.

Listed Buildings

The Parish has 14 listed buildings, of which the Parish Church of St Mary the Virgin has a Grade I listing. The church, built in the 12th Century, replaced an earlier Norman building. (see Evidence Base).

Scheduled Ancient Monuments

The Parish does not have any Scheduled Ancient Monuments but there is a Prehistoric flint mine and part of a barrow cemetery at Blackpatch on the border with Patching Parish. (see Evidence Base).

Conservation Areas

The Parish has one Conservation Area centred on the main village and largely following the lines of the 1911 settlement (see Evidence Base). The proposed housing site lies 357metres south of the nearest point to the Conservation Area and is further shielded from view by Wyatt's Copse woodland area.

Buildings or Structures of Character

The Parish has one building listed in the ADC Supplementary Planning Document (Sept 2005) as a Building or Structure of Character (see Evidence Base). The Neighbourhood Development Plan proposes adding thirteen additional buildings to the list.

Flooding and Drainage

The village, whilst not experiencing the major flooding issues of some of its neighbours, does suffer from flooding largely caused by run-off from fields. In Clapham Common the run-off is attributed to the large amounts of hard surfaced areas at the Travis Perkins and WSCC sites (see Evidence Base for full details).

Contaminated Land

The site of the old Clapham Common Brick and Tile Company brickworks is now occupied by a branch of the Travis Perkins builders merchants company and at its western end and by a West Sussex County Council Highways Depot at its eastern end. Part of the land to the north, known as Wyatt's Copse, is registered as a former landfill site; in 1965 a license was granted to excavate clay and other materials, following which the pit was filled with waste materials. Regular gas monitoring of the site is undertaken by Arun DC who consider that there is no risk to health from the site. None of the land is registered as contaminated.

4.2 As the foregoing demonstrates, the quality and status of the local natural and built environment is of considerable importance to future planning decisions in the Parish, and the environmental designations identified above form the baseline data for the assessment.

4.3 Should the Neighbourhood Development Plan not be adopted, then decisions on future planning applications will be made using the policy provisions of the Arun (saved policies) and South Downs National Park development plans (due to be adopted in 2017) and the NPPF. Given the limitation on the Neighbourhood Development 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 Development Plan. However, the CNDP emphasis is on delivering proposals that have strongly positive social and economic outcomes within the environmental limits imposed by the development 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 Development Plan and above. The location of the parish within the National Park requires that the Neighbourhood Development Plan is sensitive to the Park's strategic objectives.

5.2 Within the village there are 14 Listed Buildings, mostly located within the Conservation Area. The chosen development sites will have no impact upon the setting of the Conservation Area or on any Listed Building. Indeed, the removal of the poorly designed industrial buildings can only have a positive effect on the village setting.

5.3 There are extensive areas of ancient woodland which complement the visual value of the natural landscape. None of this woodland will be affected by the proposals.

6 Any existing environmental problems that are relevant to the Neighbourhood Development Plan

| Neighbourhood Plan SEA Objective | Neighbourhood Plan SEA Measures |
|----------------------------------|---|
| Local Distinctiveness | <ul style="list-style-type: none"> incursions of developments into surrounding landscapes development locations and design conserving the setting of Clapham |
| Historic Environment | <ul style="list-style-type: none"> number of heritage assets affected by the Neighbourhood Development Plan policies |
| Designated Environmental Sites | <ul style="list-style-type: none"> number of internationally and nationally important wildlife and geological sites (SSSI, SINC and RAMSAR) affected by the Neighbourhood Development Plan policies number of nationally or locally designated landscapes (National Park, strategic gaps, public open spaces) affected by Neighbourhood Development Plan policies |
| Flood risk | <ul style="list-style-type: none"> Hectares of Neighbourhood Area at risk from flooding, as defined by the Environment Agency, as a result of Neighbourhood Development Plan policies |

6.1 There are no specific environmental problems to which the Neighbourhood Development Plan policies are intended to respond directly, though it must be mindful of the susceptibility of Clapham Common to surface water run off from the concrete aprons at the industrial sites, and the downstream impact of surface water run-off from here and elsewhere in the Parish, on the neighbouring parish of Angmering. The land designated for housing and business start-up developments has an industrial past and while it is not designated as contaminated land, it is very likely to contain some contamination.

6.2 The primary purpose of the Neighbourhood Development Plan is to ensure the vitality and sustainability of the parish whilst being in accordance with the new Local Plan and the NPPF. It aims to do so by seeking to protect the special, open landscape character that defines the village and by minimising the environmental impact of the allocations by selecting suitable sites, when considered along with other social and economic policy objectives. It has selected the housing numbers and type of business units to minimise the impact on the existing village, whilst recognising the critical part the modest number of additional households, together with the employees in the light industrial site, can play in ensuring the survival of existing village facilities, such as the school, shop/café and church.

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

7.1 The Neighbourhood Development Plan has been prepared with the assumption that the South Downs National Park development plan will contain all the appropriate policies to protect the local environment, based on the saved policies of the ADC 2003 Local Plan and on those of the new Local Plan. It does not therefore seek to repeat such policies.

8 The likely significant effects on the environment

8.1 To assess the likely effects of the Neighbourhood Development Plan on the environment, the relevant environmental objectives used in the Arun Sustainability Appraisal of May 2013 have been adopted as the SDNP do not have any published objectives.

8.2 The environmental sub-objectives considered to be of importance to the Neighbourhood Development Plan have been 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 Clapham.

Table A - Environmental sub-objectives

8.3 The assessment of the strategic objectives and policies of the Neighbourhood Development 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 that the data is not collected or reported at a parish scale to enable an accurate assessment. However, the assessment does seek to identify the relative attributes of the policies of the Neighbourhood Development plan.

9 Assessing the impact of the Neighbourhood Development Plan Strategic Objectives

9.1 The strategic objectives of the Neighbourhood Development Plan are outlined in paragraph 3.3 above. Each of these objectives is assessed against the SEA objectives below.

| Neighbourhood Plan SEA Objective | Neighbourhood Plan Strategic Objectives | | | |
|----------------------------------|---|--------------------|---------------------------|------------------|
| | 1 Community Facilities | 2 Housing Needs | 3 Environmental Assets | 4 Flood Risks |
| Historic Environment | 0 | 0 | + | 0 |
| Designated Environmental Sites | 0 | + | + | + |
| Flood Risk | 0 | + | + | + |
| Local Distinctiveness | 0 | + | + | + |
| Social | 0 | + | + | + |
| Economic | + | + | 0 | + |

Table B - Neighbourhood Development Plan Strategic Objectives impact

9.2 The comparison of objectives suggests that the Neighbourhood Development Plan has the potential to deliver strong positive environmental impact, even though only modest housing and business start-up developments are proposed. Designated sites have been avoided through the location of the proposed developments, and therefore there are unlikely to be any significant adverse environmental effects resulting from the implementation of the Neighbourhood Development Plan.

10 Assessing the impact of the Neighbourhood Development Plan policies

10.1 The Neighbourhood Development 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 each proposed policy with the Neighbourhood Development Plan not having a policy.

Policy HD5 - Housing Site Allocation

10.2 The policy allocates land for a maximum of 30 homes.

The objectives of the housing policy section of the NP are:

- Small scale limited housing development will be supported where the development has demonstrated that it meets a local need and is provided in a suitable and sustainable location.
- Ensure that new housing development includes a range of house types, including affordable housing which is integrated and inclusive within the overall development.
- Ensure that all new development is designed to maintain the character of its surroundings.
- Maintain the open countryside setting and preserve the existing rural character and setting.
- Ensure that agricultural land is protected from development.

10.3 The Parish does not have a housing allocation specified by the LPA and initially did not set out to provide new homes other than to allow for windfall sites. However, the Housing Needs Study carried out as part of a Parish-wide survey identified a local requirement for homes, specifically 12 adults who need but cannot obtain a home in Clapham, and 15 young people who may need a home in the future. It also identified 24 people who may wish to move to more manageable housing in the future.

10.4 In light of the identified housing need the Parish looked to sites within the parish boundary to try to provide a site for homes for residents. Two brownfield sites, currently in employment use, are planned to cease trading within the life of the Plan and were therefore considered as appropriate locations for housing. Neither sites owner can be compelled to sell the land for housing and either or indeed both may decide to keep the land in employment use. Should this happen, or should SDNP determine that the land may not be used for housing, then the current use would remain.

10.5 The brownfield sites identified, which are adjacent, are currently in use as a builder's merchants (shown as A in the aerial view at 13) and a WSCC highways maintenance depot (shown as B) respectively.

Site A is owned by Travis Perkins. It is approximately 2.42 hectares in area, and is a concrete apron with a number of storage buildings and small office buildings, as well as outdoor storage areas. Site B is owned by WSCC and is approximately 1.4 hectares in area. It consists of a large concrete apron with a range of storage buildings and small office buildings.

Local knowledge reports that the large area of concrete (some 4ha in total) contributes significantly to local flooding as the water runs off the apron and onto surrounding land and properties. Both sites stand on the site of the former brickworks of the Clapham Brick and Tile Company, and although the land is not registered as contaminated, there is the possibility of contamination.

The sites are bounded to the north by residential and business premises at the western end, and by Wyatt's Copse, part of which is designated Ancient Woodland, with the remainder being a registered former landfill site further east. In 1965 a licence was granted to excavate clay and other materials, following which the pit was filled with waste materials. Regular gas monitoring of the site is undertaken by Arun DC, who consider that there is no risk to health from the site.

To the south the access road off the A280 passes a number of residential properties. It is used daily by large lorries either delivering to one or other of the sites or transporting materials away. This causes significant issues with access and also with air quality as lorries are often queuing with their engines running. At times, when lorries are unable to enter Brickworks Lane, they obstruct the flow of traffic on the A280 causing potential road safety issues and block entry into Clapham Common (see Evidence Base for images). Whilst the existing access onto the A280 is not ideal, the current problems will not be exacerbated by any significant increase in traffic generated by the housing/business start-up developments, and would be likely to reduce considerably the number of large lorries entering Clapham Common. There are opportunities to create alternative access and any developer should be encouraged to explore these.

Either site would be suitable for a modest housing development of not more than 30 houses (c 23% of the current community size), and the other for conversion to small business and retail units particularly intended for start-ups, for which a demand has been identified. While site B would in some respects be more suitable for housing, being better screened from the surrounding area by woodland and the trees along its boundary, and the use of Site A for the light industrial units would minimise the distance that commercial vehicles had to travel through the settlement a straw poll of local residents indicated a clear preference for site A being used for housing, and site B for the small business/retail units.

A Development Brief will be commissioned by the CNDP team detailing the key design and environmental requirements for delivery of the development to ensure that the setting of the heritage assets is not harmed and is indeed improved. This work will be undertaken once the outcome of the Referendum is known.

The Sussex Biodiversity Record Centre does not record any designations for the site.

The SHLAA prepared by SDNP does not identify any land within the Parish as suitable for housing.

| Neighbourhood Plan SEA Objective | Proposed Policy | No Policy |
|----------------------------------|-----------------|-----------|
| Historic Environment | + | - |
| Designated Environmental Sites | 0 | - |
| Flood risk | + | - |
| Local Distinctiveness | + | 0 |
| Social | + | 0 |
| Economic | + | 0 |

Table C - Housing Site Allocation Policy Impact Assessment

10.6 The impacts of this policy are positive and reusing brownfield and potentially derelict land will enhance the local distinctiveness of Clapham and involve the remediation of any land contamination. The removal of the large area of concrete apron is likely to have a positive effect on flood risk.

10.7 The option of not having a policy would likely have a negative impact as all new development would be piecemeal with less control over design and cumulative drainage issues. Not delivering homes for local people would be unlikely to secure a successful referendum vote.

10.8 Alternative sites were considered but would not secure a positive future for these brownfield sites.

Policy GA1 Connection to sustainable transport , local networks and green infrastructure

10.9 The policy proposes a series of initiatives aimed at addressing the environmental impacts of traffic. It seeks to promote walking and cycling as alternatives to the private car for journeys in and around the village and to improve connectivity to key village assets such as the church and school.

| Neighbourhood Plan SEA Objective | Proposed Policy | No Policy |
|----------------------------------|-----------------|-----------|
| Historic Environment | 0 | - |
| Designated Environmental Sites | + | - |
| Flood risk | 0 | 0 |
| Local Distinctiveness | 0 | 0 |
| Social | + | 0 |
| Economic | 0 | 0 |

Table D - Transport Policy Impact Assessment

Policy CFW4 Designation of local green spaces

10.10 The policy proposes the designation of three Local Green Spaces, reflecting their value to local people in terms of recreation and special landscape character. Their designation will protect the spaces from development for the plan period and beyond. Leaving them unallocated could lead to their loss to development.

| Neighbourhood Plan SEA Objective | Proposed Policy | No Policy |
|----------------------------------|-----------------|-----------|
| Historic Environment | + | - |
| Designated Environmental Sites | + | - |
| Flood risk | 0 | 0 |
| Local Distinctiveness | + | 0 |
| Social | + | 0 |
| Economic | 0 | - |

Table E - Green Space Policy Impact Assessment

Policy CFW3 Protection of assets of community value

10.11 This policy proposes the designation by the local planning authority of Assets of Community Value under the Localism Act 2011. The policy has a positive impact in respect of two assets already designated heritage assets and on the Conservation Area by providing a contingency for the future closure of their operations. This may prevent them falling into disrepair or undergoing a deleterious change of use.

The option of not having a policy will reduce the opportunity for the local community to have a contingency plan and so is assessed as a negative impact.

| Neighbourhood Plan SEA Objective | Proposed Policy | No Policy |
|----------------------------------|-----------------|-----------|
| Historic Environment | + | 0 |
| Designated Environmental Sites | + | 0 |
| Flood risk | + | 0 |
| Local Distinctiveness | 0 | - |
| Social | + | - |
| Economic | + | - |

Table F - Assets of Community Value Policy Impact Assessment

Policy BT3 Support for new commercial uses

10.12 The policy supports the development of new business premises on a brownfield site which avoids any negative environmental impact. Opportunities to improve surface water run-off will also improve flood risk.

10.13 Allowing the site to continue as a heavy industrial site cannot be prevented and any environmental impact is already present. The policy would mitigate the environmental and visual impact of the current use by creating smaller units, removing storage of potentially contaminating materials, reducing the use of large vehicles, and potentially creating open areas to break up the concrete apron. In addition, it would offer social and economic benefits by providing at least as much local employment as before, thus contributing to the vitality and viability of the village as well as generating valuable additional support for local facilities such as the shop/café.

| Neighbourhood Plan SEA Objective | Proposed Policy | No Policy |
|----------------------------------|-----------------|-----------|
| Historic Environment | + | 0 |
| Designated Environmental Sites | + | 0 |
| Flood risk | + | 0 |
| Local Distinctiveness | + | 0 |
| Social | + | 0 |
| Economic | + | 0 |

Table G - Commercial Use Policy Impact Assessment

11 Assessment Conclusion

The policy options chosen in the Neighbourhood Development Plan have been assessed as those where genuine, plausible options were available and that achieved an appropriate balance between avoiding a significant environmental impact and meeting the strategic objectives of the Plan.

The Neighbourhood Development Plan is seeking to avoid any incursions by new development into the landscape and setting of Clapham and to improve two unattractive brownfield sites.

12 The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the Neighbourhood Development Plan

12.1 The assessment indicates that every policy has either a positive or neutral environmental impact.

13 An outline of the reasons for selecting the alternatives dealt with

13.1 With all the policies, where there were reasonable alternatives to compare, the conclusion reached was that the preferred options now proposed in the Neighbourhood Development Plan were those that would avoid any significant environmental impact when considered alongside its strategic objectives.

14 A description of measures envisaged concerning monitoring

14.1 The Neighbourhood Development Plan proposes that the progress in its implementation will be assessed using the measures identified for each of its strategic objectives. They will be reported in the SDNP Annual Monitoring Reports.

Planning applications will be assessed against a development brief which will set out the key design and environmental requirements of any development.

15 Aerial view of proposed housing and industrial sites



16 Appraisal of all policies

For completeness all the policies of the Plan have been assessed whether or not they involve any proposed new land uses.

| Policy Title | Social | Economic | Environmental |
|---|---------------|-----------------|----------------------|
| GA1 Connection to sustainable transport , local networks and green infrastructure | 0 | 0 | + |
| GA2 Footpath and cycle path network | + | 0 | + |
| GA3 Safe walk to school routes | + | 0 | + |
| BT1 Support for business | 0 | + | 0 |
| BT2 Retention of employment land | 0 | + | 0 |
| BT3 Support for new commercial uses | 0 | + | 0 |
| BT4 The Village Shop/Café | + | + | 0 |
| BT5 Improving signage | 0 | 0 | 0 |
| BT6 Recreational and tourism activities | + | + | 0 |
| BT7 Rural Buildings | 0 | + | + |
| BT8 Communications infrastructure. | + | + | 0 |
| BT9 Sustainable Commercial Buildings | 0 | + | + |
| BT10 Agricultural/Horticultural/Horsicultural employment | 0 | + | + |
| CFW1 Support Independent Living | + | 0 | 0 |
| CFW2 Recreation facilities | + | 0 | 0 |
| CFW3 Protection of assets of community value | + | + | 0 |
| CFW4 Designation of local green spaces | + | 0 | + |
| HD1 Grade 1, 2 and 3a Agricultural Land | 0 | + | + |
| HD2 Quality of Design | 0 | 0 | + |
| HD3 Housing mix | + | 0 | 0 |
| HD4 Housing Density | 0 | 0 | + |
| HD5 Housing site allocation | + | 0 | 0 |
| HD6 Windfall sites | 0 | 0 | 0 |
| HD7 Outdoor space | + | 0 | + |
| HD8 Attention to detail | 0 | 0 | 0 |
| HD9 Local Connection | + | 0 | 0 |
| HD10 Car parking | + | 0 | 0 |

17 Other Evidence

Detailed supporting documents and evidence can be found on our web site at clapham.arun.gov.uk/Evidence

1. Listed Buildings Map
2. Clapham Conservation Area
3. Ancient Woodland Inventory for West Sussex
4. Ancient Woodland Map
5. Public Rights of Way Map
6. Open Access area map for Clapham Woods
7. Flooding Report
8. Desktop Biodiversity Report for Clapham
9. Flint and Brick Walls Maps
10. Bird Observations
11. Landfill Monitoring Maps
12. Photo montage of Industrial site traffic issues
13. Photo montage of Clapham past and present.

