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# Sustainability Appraisal of the further Main Modifications to the Arun Local Plan (2011-2031)

## Non-Technical Summary

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**Client:** Arun District Council

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# Non-Technical Summary

## Introduction

- 1.1 This Non-Technical Summary relates to the Sustainability Appraisal Report which has been prepared by LUC on behalf of Arun District Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the further Main Modifications to the Arun Local Plan 2011-2031<sup>1</sup>.
- 1.2 It presents an assessment of the changes outlined in the Table of further Main Modifications (November 2017) and the Modified Arun Local Plan January 2018 Consultation (December 2017) produced by Arun District Council which have arisen since the resumption of the examination of the Local Plan in July 2017, as well as an assessment of all other policies and site options presented in the Local Plan. It includes a summary of all of the information required by the Strategic Environmental Assessment (SEA) Directive<sup>2</sup>, transposed into law in the UK by the SEA Regulations<sup>3</sup> (Statutory Instrument 2004, No 1633) (see **Table 1**).

## The Arun Local Plan

- 1.3 The Arun Local Plan 2011-2031 (Publication Version, October 2014) was submitted on 30<sup>th</sup> January 2015 for independent examination to the Secretary of State for Communities and Local Government. The Local Plan sets out a vision for the future of Arun up to 2031. It sets the planning framework for the district, details planning policy and identifies the amount of development proposed and where it should be located. It will be used in the consideration of planning applications. The Plan covers the Arun Local Planning Authority area which is the Arun District Council administrative area excluding land within the South Downs National Park Authority boundary.
- 1.4 In January 2016, during the early stages of the Examination in Public hearing sessions, a session on Objectively Assessed Need took place. The purpose of the session was to provide an opportunity for the Inspector to lead discussion and hear views on the Council's re-advertised OAN for market and affordable housing. In light of the revised OAN published by GL Hearn on behalf of the Council in March 2015 (which concluded more houses per annum would be required than in the submitted Local Plan), the Inspector decided on the 2<sup>nd</sup> February 2016 to suspend the Examination, pending completion of supplementary work by the Council. Arun District Council commissioned a number of technical reports to support the proposed modifications to the Local Plan (available at <http://www.arun.gov.uk/local-plan-examination>):
  - **Littlehampton Economic Growth Area (LEGA) Delivery Study** – prepared in response to the Inspector's comments where he was unable to find the proposed allocation sound on the basis of an outstanding objection from the Environment Agency. The report was prepared in close consultation with the EA and resulted in the site being removed from the functional flood plain (Flood Zone 3b).
  - **Employment Land Needs Study** – reviewed the higher housing delivery scenarios as well as future employment space requirements based on different scenarios. An 'Employment

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<sup>1</sup> These modifications are post the 'Main Modifications to the Arun Local Plan 2011-2031' which was published for consultation in April 2017.

<sup>2</sup> SEA Directive 2001/42/EC

<sup>3</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

Review Study' was also undertaken to analyse recent employment studies and local market evidence.

- **Habitats Regulation Assessment** – prepared in response to the revised OAN for housing. Assessed the range of scenarios and options for housing provision and the likely significant effects on internationally important nature conservation sites. The HRA is being updated in parallel with the SA to take account of the further Main Modifications to the Arun Local Plan. The Appropriate Assessment Addendum (December 2017) concludes that the further Main Modifications are not predicted to significantly alter the profile or scale of the effects of the Local Plan over and above those predicted at the Proposed Modifications consultation stage.
- **Transport Assessment Study and Level Crossing Feasibility Assessment** – assessed the impact of the five development scenarios on the highway network. The study also includes a feasibility assessment of the level crossing options at Ford and Yapton.
- **Landscape Capacity Study** – assessed each site's sensitivity and value and determined the development capacity (in landscape terms).
- **Infrastructure Delivery Plan** – assessed the infrastructure implications associated with developing each site.
- **Affordable Housing and Viability Study** – assessed the potential in terms of development viability for sites to contribute towards meeting affordable housing needs. The study also undertook a viability assessment of the Local Plan as a whole and tested the viability of both strategic sites and sites included in the Housing and Employment Land Availability Assessment Database.
- **Open Space, Indoor Sport and Leisure Facilities Strategy/Playing Pitch & Outdoor Sports Strategy** – sets out the open space, indoor and outdoor sports infrastructure requirements for the District.
- **Strategic Flood Risk Assessment** – replaces the Level 1 and Level 2 SFRA originally published in February 2008 and provides appropriate supporting evidence on the long term management of flood risk.
- **Strategic Surface Water Management Study** – assessed the impacts of the strategic housing development sites on surface and groundwater in the Lidsey, Aldingbourne and Pagham Rife catchment areas.
- **Housing and Employment Land Availability Assessment** – prepared to update and review the existing HELAA which was based on 2009 data. The HELAA is a technical and theoretical assessment of sites which could potentially contribute towards the future supply of housing and employment land within the Local Planning Authority Area (LPAA).
- **Retail Capacity Study** – prepared as an update to the Arun Retail Study 2013.
- **Housing Needs Update** – prepared by GL Hearn as an update to the housing needs evidence and considered whether there are any implications for the OAN arising from the 2014 based Sub-National Population Projections (issued by the Office for National Statistics [ONS] in May 2016) and associated Household Projections (published by Department for Communities and Local Government [DCLG] in July 2016).

1.5 These studies have informed the assessment process for the sustainability appraisal, which was also commissioned to be updated. An SA of the first set of Main Modifications to the Arun Local Plan 2011-2031 was published in April 2017 for consultation alongside the plan. As stated above, this NTS presents an assessment of the changes outlined in the Table of further Main Modifications (November 2017) and the Modified Arun Local Plan January 2018 Consultation (December 2017), as well as an appraisal of the unchanged policy and site options presented in the Local Plan.

## Context for the Arun Local Plan Modifications and the Sustainability Appraisal Process

- 1.6 Arun District Council (ADC) commissioned LUC in June 2016 to undertake a review of the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) of the modifications to the Arun Local Plan. The Arun Local Plan and its associated 2014 Sustainability Appraisal Report were submitted to the Government for examination in January 2015. The Local Plan was based on a housing requirement figure of 580 dwellings per annum (dpa). The annualised housing requirement of 580dpa was challenged during the examination, prompting further work to establish a revised Objectively Assessed Need for housing.
- 1.7 In March 2015, an updated OAN report published by [GL Hearn](#) considered the objectively assessed housing need to be 758dpa, an increase of 178dpa compared with the 580dpa housing target within the publication version Local Plan.
- 1.8 In July 2015, the Inspector's preliminary examination findings in relation to Sustainability Appraisal suggested that a new, clear and simplified SA report would provide a more adequate approach. The Inspector also commented that the audit-trail of decision making was not clear (i.e. the reasons for selecting reasonable alternatives, preferred alternatives, and discounting alternatives). Following correspondence between the Inspector, the Council and the additional hearing session on the revised OAN held in January 2016, the Inspector agreed to formally suspend the Examination in February 2016<sup>4</sup> to enable the Council to carry out the programme of work required to review the most appropriate spatial strategy to meet the updated OAN (which the Inspector recommended should be 845dpa, an increase of 265dpa compared to the original 580dpa in the submitted Local Plan). The Inspector also suggested that suspension of the Examination in Public process for 15 months presented an opportunity for a new SA to be prepared which will provide a transparent comparative analysis of the reasonable alternatives for meeting the requirements of a higher objectively assessed need.
- 1.9 Following receipt of the Inspectors' conclusions, an update to the growth and distribution scenarios was reported to the Local Plan sub-committee on 1<sup>st</sup> March 2016 which identified a range of growth scenarios (650dpa, 758dpa, 845dpa, and 1,000dpa) and the distribution of growth to be tested<sup>5</sup>.
- 1.10 In September 2016, the Council published an [Updated Housing Needs Evidence Report](#), prepared by GL Hearn, which identified a revised OAN of 919dpa based on 2014-based population and household projections (the 845dpa identified by the Inspector was based on 2012-based population and household projections).
- 1.11 Taking into account the most up-to-date OAN for the plan period and the Inspector's findings in relation to the previous SA, an updated SA Report was prepared in April 2017 incorporating a revised and simplified SA Framework which has been used to assess the sites and policies to ensure consistency between the different aspects of the Local Plan.
- 1.12 Consultation on the Main Modifications to the Arun Local Plan and its associated SA Report was undertaken from 10<sup>th</sup> April 2017 to 30<sup>th</sup> May 2017. Following the consultation period, the main modifications together with representations received and all other supporting documentation produced by ADC was submitted to the appointed Planning Inspector in order to enable the Examination in Public of the Arun Local Plan to resume.
- 1.13 During the course of the resumed Examination, further Main Modifications have emerged either as suggested by ADC, the Planning Inspector or other parties. ADC has assessed and collated these to address the soundness of the Arun Local Plan so that the Inspector can consider these when forming conclusions about the Arun Local Plan.
- 1.14 In November/December 2017, ADC finalised the Table of further Main Modifications and the Modified Arun Local Plan January 2018 Consultation. This SA Report appraises these further main

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<sup>4</sup> IDED18-OAN-Conclusions

<sup>5</sup> Arun District Council, 2016. *Local Plan Sub-Committee Minutes 30/06/2016* [pdf]. Available at: <http://www1.arun.gov.uk/PublicViewer/Tempfiles/5f63e86c24d8409.pdf> [Accessed 14 July 2016]

modifications contained in this document as well as presenting an assessment of the unchanged policies and site options that were appraised for the previous iteration of the Local Plan.

## Sustainability Appraisal and Strategic Environmental Assessment

### Introduction

- 1.15 Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.16 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive<sup>6</sup>, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>7</sup>. The purpose of SEA, as defined in Article 1 of the SEA Directive is “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development”.
- 1.17 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance<sup>8</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. The SA/SEA of the Arun Local Plan was prepared in line with this integrated approach and throughout the SA report and this Non-Technical Summary the abbreviation ‘SA’ should therefore be taken to refer to ‘SA incorporating the requirements of SEA’.
- 1.18 **Table 1** signposts how the requirements of the SEA Regulations have been met within the SA report. Note that although the SA Report relates mostly to the further Main Modifications to the Arun Local Plan, some appraisal of site options considered at earlier stages has been necessary to meet the SEA Regulations requirements, and the audit trail of decision making at earlier stages has also been included in the SA Report.

**Table 1 Requirements of the SEA Regulations and where these have been addressed in this SA Report**

SEA Regulations’ Requirements	Covered in the SA Report?
<b>Environmental Report</b>	
Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of: (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2).	
1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Chapter 3 and Appendix 1.
2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3.

<sup>6</sup> SEA Directive 2001/42/EC

<sup>7</sup> Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/>

SEA Regulations' Requirements	Covered in the SA Report?
3) The environmental characteristics of areas likely to be significantly affected.	Chapter 3.
4) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.	Chapter 3.
5) The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapter 3 and Appendix 1.
6) The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as: (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).	Chapter 4-7 and Appendices 4-10.
7) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapter 4-7 and Appendices 4-10.
8) 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.	Chapter 2 and Appendix 12.
9) A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Chapter 9.
10) A non-technical summary of the information provided under paragraphs 1 to 9.	This separate non-technical summary document has been prepared to accompany the SA Report.
The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of: (a) current knowledge and methods of assessment; (b) the contents and level of detail in the plan or programme; (c) the stage of the plan or programme in the decision-making process; and (d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. (Regulation 12 (3))	Addressed throughout this SA report.
<b>Consultation</b>	
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies. (Regulation 12(5))	Consultation on the SA Scoping Report was undertaken in July 2016. Consultation on the SA Report of the Main Modifications to the Arun Local Plan was

SEA Regulations' Requirements	Covered in the SA Report?
	undertaken from 10/04/17 to 30/05/17.
<p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall:</p> <p>(a) send a copy of those documents to each consultation body;</p> <p>(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees");</p> <p>(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.</p> <p>The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>	<p>Consultation is being undertaken in relation to the further Main Modifications to the Arun Local Plan from January/February 2018 for a six week period. The current consultation document is accompanied by the SA Report.</p>
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:</p> <p>(a) notify the Secretary of State of its opinion and of the reasons for it; and</p> <p>(b) supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.</p> <p>(Regulation 14 (1))</p>	N/A
<b>Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)</b>	
<p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <p>(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.</p> <p>(Regulation 16(1))</p>	To be addressed after the Local Plan is adopted.
<p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <p>(a) the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State,</p> <p>that the plan or programme has been adopted, and a statement containing the following particulars:</p> <p>(a) how environmental considerations have been integrated into the plan or programme;</p> <p>(b) how the environmental report has been taken into account;</p> <p>(c) how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into</p>	To be addressed after the Local Plan is adopted.

SEA Regulations' Requirements	Covered in the SA Report?
account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	
<b>Monitoring</b>	
The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))	To be addressed after the Local Plan is adopted.

## Summary of changes since the previous SA

- 1.19 **Table 2** overleaf presents an overview of the changes to SA scores since the SA of the Main Modifications to the Arun Local Plan. The majority of further Main Modifications do not have an effect on the SA scores, however, where they do have an effect, it is generally to remove uncertainty associated with the effects and to assign positive scores to previously negative or negligible scores.

**Table 2 Further Main Modifications changes to SA scores**

Main Modification Reference	Chapter	Policy / Paragraph Number	Proposed Modification (deleted text shown as <del>struck through</del> and additional text shown <u>underlined.</u> )	SA Objective	Main Mods SA Score	Further Main Mods SA Score	Explanation of score change
MM 1	2	2.1	Add wording re: additional DPD's. " <u>...prepared by local communities. The Development Plan may include a Non-Strategic Sites Development Plan Document (DPD) and Employment Allocations DPD depending on monitoring and will include a Gypsy and Traveller and Travelling Showpeople Sites Allocation DPD. Other local documents, including Supplementary Planning Documents and design guidance, will also supplement the Local Plan. These are set out in the Council's Local Development Scheme (LDS). The Plan sets out...</u> "				No change to SA scores as a result of the further Main Modification.
MM 2	4	Table 4.1 Strategic Objectives box , objective 5	Add additional wording in the middle of the Objective to read: ' "To protect and enhance Arun's outstanding landscape, countryside, coastline, historic, built and archaeological environment, <u>as well as the setting of the South Downs National Park</u> , thereby reinforcing local character and identity;"  NB: There are consequential changes where the objective is quoted in other parts of the document.	Assessed in the further Main Modifications SA, however, the strategic objectives were not assessed in the Main Modifications SA - see Table 1.3.			
MM 3	6	SD SP1	Delete paragraph two and three (including sub parts a and b) to read as follows:  "When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland).  <del>Planning applications that help to achieve the central aim of this Local Plan, which is to increase employment density and which accord with the policies in this Local Plan and/or adopted Neighbourhood Development Plans will be approved, unless material considerations indicate otherwise.</del>  <del>"Where there are no relevant policies in this Local Plan (and where relevant, with policies in Neighbourhood Development Plans) development proposed will be approved without delay unless material considerations indicate otherwise — taking into account whether:</del>  <del>a. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</del>  <del>b. Specific policies in that Framework indicate that development should be restricted.</del>  This presumption will not be applicable where development requires an Appropriate Assessment or where consideration of the need for one is being				No change to SA scores as a result of the further Main Modification.

Main Modification Reference	Chapter	Policy / Paragraph Number	Proposed Modification (deleted text shown as <del>struck through</del> and additional text shown <u>underlined</u> .)	SA Objective	Main Mods SA Score	Further Main Mods SA Score	Explanation of score change
			undertaken."				
MM 4	6	SD SP1a	<p>Amend Policy SD SP1a to read:</p> <p>"To maintain the District's unique character as a coastal location set against the South Downs whilst ensuring that the needs of the community are met through sustainable growth and the provision of suitable services, the spatial strategy for Arun District to 2031 is to;</p> <p>a. promote and enable development which supports the main coastal towns of Bognor Regis and Littlehampton role as the main service, employment, retail and social centres <u>including;</u></p> <p>i. enabling development that supports Bognor Regis as a holiday centre and University Campus location, and</p> <p>ii. enabling development that supports Littlehampton as a civic centre with a harbour town set at the mouth of the river Arun with an expanding leisure, recreation and marine based economy.</p> <p>b. enable development that recognises the <u>sustainable and</u> historic character of the town of Arundel with its historic buildings set at the foot of the South Downs.</p> <p>c. provide for growth of the sustainable villages whilst maintaining their setting within the open countryside.</p> <p>d. <del>provide for the economy by identifying existing sites of important employment use and allocate land to meet the future needs of both the district and supports the economic development of the coastal market area.</del> <u>Provide for the economic needs of the community by allocating circa 75 hectares of employment land to meet the needs and aspirations for the District to support the regeneration of Bognor Regis and Littlehampton, support job creation, provide for the needs of modern business, increase the attractiveness of the District as a business location and support the economic development of the coastal market area.</u></p> <p>e. provide for the housing needs of the community by delivering 20,000 homes of an appropriate scale and tenure as well as meeting the needs of the Gypsy and Travellers and Travelling Showpeople.</p> <p>f. provide for development in the countryside area which reflects its character and role as the coastal plain, with green wedges separating urban areas, high quality agricultural land and environmental assets.</p> <p>g. encourage the effective use of previously developed land in accordance with the strategy, provided that it is not of high environmental value.</p> <p>h. support development which protects, conserves and enhances built heritage.</p> <p>i. monitor the delivery of the strategy and associated infrastructure with partners organisations, developers and landowners.</p> <p><u>j. Ensure that development, particularly in the undeveloped areas of the District, takes account of the coastal topography to mitigate and adapt to climate change, especially in high risk flood areas.</u></p>	7. Biodiversity and Geodiversity	+/-	+?	See text added at criterion (k)
				8. Water	-	+?	See text added at criterion (j)
				9. Flooding	+/-	+?	See text added at criterion (j)
				11. Soil	+/-	+?	See text added at criterion (k)

Main Modification Reference	Chapter	Policy / Paragraph Number	Proposed Modification (deleted text shown as <del>struck through</del> and additional text shown <u>underlined</u> .)	SA Objective	Main Mods SA Score	Further Main Mods SA Score	Explanation of score change
			k. Retain and enhance natural environment resources, including biodiversity.				
MM 5	7	7.2.7, 7.2.8 and SD SP2	<p>Insert a new (second) bullet point to paragraph 7.2.7: "<u>all strategic allocations as identified by the Local Plan</u>;"</p> <p>Amend paragraph 7.2.8 to read: ..."The boundaries, whilst fixed as part of this plan, may be altered as part of other, separate, planning policy documents such as a site specific allocation document or a Neighbourhood Development Plan—<del>providing these do not reduce the coverage of a Built-Up Area Boundary</del>. The boundaries may also need to be reviewed if the Council is unable to find contingencies to meet any shortfall in its 5 year Housing Land Supply.."</p> <p>Delete the first paragraph of SD SP2 and replace with: "<u>Built-Up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built-Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.</u>"</p> <p>Delete second paragraph "<del>The boundaries can be altered....</del>"</p>	No change to SA scores as a result of the further Main Modification.			
MM 6	7	C SP1	<p>First paragraph should be amended to read as: "<u>Outside the Built-Up Area Boundaries (as identified on the Policies Maps) land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will not be permitted in the countryside unless it is...</u>"</p> <p>Delete 'Permission will not be given....etc.'</p> <p>Amend criterion b to read: for <del>quiet</del>, informal recreation; or</p>	No change to SA scores as a result of the further Main Modification.			
MM 7	7	GI SP1	<p>Add the following sentence to the end of the second paragraph: "<u>... a joined up Green Infrastructure Network. <del>The Green Infrastructure Network must be protected from light pollution to ensure that areas defined by their tranquillity are protected from the negative effects of light in development.</del></u>"</p> <p>Delete final paragraph <del>Gaps between settlements should also be considered as important Green Infrastructure assets and should be protected from inappropriate development, and enhanced to ensure that they provide high quality environment and multi-functional benefits for the District.</del></p>	No change to SA scores as a result of the further Main Modification.			
MM 8	7	SD SP3	<p>Delete criterion e.</p> <p>Add additional criterion '<u>If a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.</u>'</p>	No change to SA scores as a result of the further Main Modification.			
MM 9	7	LAN DM2	"Delete first two paragraphs and replace to read as:	No change to SA scores as a result of the further Main Modification.			

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			" <del>Development will not be permitted within the area identified on the Policies Map which would adversely affect the views of the town of Arundel, its castle, cathedral and its special setting. Any development, including the proposed A27 Arundel bypass, will be of a high design standard that reflects the quality of the landscape and the setting of Arundel. No development will be permitted, particularly within the area shown on the Policies Map, which would adversely affect the rural views outwards from the town and in particular from the following locations:</del>				
MM 10	8	EMP SP1	<p>Amend the first paragraph of Policy EMP SP1 to read "The Council, with partners, will promote the sustainable growth of the District's economy to meet the varying needs of different economic sectors and to support regeneration within the two main towns. <del>Sufficient employment sites will be identified, and premises will be safeguarded in order to meet the needs of the economy to support job creation, the needs of modern business and the attractiveness of the District as a business location.</del> The Plan allocates <u>circa 75 hectares of employment land in order to provide sufficient flexibility to meet the future needs and aspirations for the District to support the regeneration of Bognor Regis and Littlehampton, support job creation, provide for the needs of modern business, increase the attractiveness of the District as a business location, and support the economic development of the coastal market area.</u> This will comprise: .....</p> <p>Amend criterion 'a' to read: "Promoting regeneration of the Districts <u>main</u> town centres as the focus for retail, office and leisure development, especially in the Bognor Regis and Littlehampton Economic Growth Areas <u>in accordance with the sequential test;</u>"</p> <p>Insert an additional criterion to read: "<u>k. The integration of other uses and forms of development where it facilitates the delivery of economic objectives and fosters growth and innovation</u> " "<u>l. The provision of appropriately scaled enabling development where such uses compliment, and are compatible with, employment/commercial uses.</u></p>	No change to SA scores as a result of the further Main Modification.			
MM 11	8	EMP SP2	<p>Amend the first sentence of the second paragraph so that it reads: "Knowledge and cultural based employment <del>including as well as</del> retail, leisure and office developments will be directed to the Economic Growth Areas to promote their vitality, viability and regeneration."</p> <p>Insert the following at the start of the first paragraph under the 'Littlehampton Economic Growth Area' sub-heading: "<u>The LEGA includes the Harbour (east and west bank), Town Centre, industrial estates, part of the beach front, surrounding housing and a strategic housing allocation at west bank.</u>"</p>	No change to SA scores as a result of the further Main Modification.			

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			Insert the following text after the fifth bullet point: "Development in the wider Economic Growth Area will be encouraged which increases the vitality of the town centre. The redevelopment of the town centre site owned by the District Council (St. Martins Car park), along with improvements to the public realm will be a key priority. Developments which support the towns retail, leisure and tourism functions will be supported."				
MM 12	8	EMP SP3	Insert additional wording after point e and before table:  "Development of site 7 at Angmering will need to be designed as part of the Strategic Housing Allocation (SD9). Due to the close proximity to the South Downs National Park, proposals for the employment allocation will need to demonstrate that the proposal: - Is located in an easily accessible part of the site, in close proximity to the A280; - Is developed in such a way so that it will not have a detrimental impact upon the setting of the South Downs National Park; - ensures that flood risk is satisfactorily mitigated; and - integrates Smarter Choices transport measures." In Table 8.1 amend the size of Employment of site 7 'West of A280 - North of Water Lane' from 8.3ha to 3.0ha Amend the total to read 74.5	No change to SA scores as a result of the further Main Modification.			
MM 13	8	EMP DM1	Amend paragraph under section 4 to read: "The Council will seek to direct office development to the town centres. Enterprise Bognor Regis will also be considered as a suitable location for office development –subject to the enterprise bognor Regis and retail policies in this plan in accordance with Policy EMP DM2."  Amend criterion a (section 6) to read: "That it is appropriate sized <del>a modest</del> extension of an existing employment site, or no acceptable alternative can be identified within existing permitted or allocated sites, or within or through redevelopment of existing commercial premises, and which can be delivered in a reasonable timeframe;" Delete criterion f (section 6): f. That it is not in a protected area including Gaps Between Settlements (SD SP3);	No change to SA scores as a result of the further Main Modification.			
MM 14	8	EMP DM2	Insert an additional criterion after criteria g to read: "Development proposals incorporating retail, leisure or office development should demonstrate that the proposal satisfies the sequential test and impact test in accordance with national planning policy."  Insert the following at the end of the policy: "Redevelopment of site 2 - Rowan Park, should not take place until the existing use has been successfully relocated"	No change to SA scores as a result of the further Main Modification.			
MM 15	9	9.1.4 and RET SP1	Insert the following text after first sentence of paragraph 9.1.4:	No change to SA scores as a result of the further Main Modification.			

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			<p><del>"Town centres are those defined in the NPPF as the primary shopping area and areas predominantly occupied by main town centre uses."</del></p> <p>Amend title of policy RET SP1 to read: Hierarchy of Town Centres</p>				
MM 16	9	9.2.1 and RET DM1	<p>Insert the following text at the end of the paragraph:  <u>"In considering individual proposals for changes of use from A1 retail in town centres under section 2 of policy RET DM1 the Council will take account of the location of the premises in relation to the primary and secondary frontages identified in the Plan"</u></p> <p>Amend RET DM1 as follows,;            Sections 1, 2 and 3 replace phrase 'retail development' with '<u>Town Centre uses</u>'</p> <p>Add a new second paragraph to the end of section 3 to read:  <u>"Impact assessment for growth of office, leisure and retail development outside of town centres will be required from a threshold of 1,000sqm for Town Centres, Large Service Centres and the Six Villages larger centres and 200 sqm for village and suburban local centres."</u></p> <p>Section 3: Replace the first paragraph with:  <u>'Town centre uses should be accommodated in town centres. Proposals for Town Centre uses outside the centres defined on the Policies Map will only be permitted if.. etc'.</u></p>	No change to SA scores as a result of the further Main Modification.			
MM 17	10	10.1.1	<p>Add the following text to the end of paragraph 10.1.1 to read:</p> <p><u>"Tourism is an important cultural and economic driver for the economy and general wellbeing of Arun. Harnessed well it can provide additional facilities for local residents, a source of employment and a driver to enhance the sense of place in the coastal and inland areas of Arun. Visitor related development can play an important role in rural diversification. The quality of Arun's natural environment draws many visitors. It is necessary to balance the provision of visitor facilities against the need to safeguard the landscape, character and environment of Arun, including the setting of the South Downs National Park and green infrastructure sites, both alongside the coast and inland."</u></p>	No change to SA scores as a result of the further Main Modification.			
MM 18	10	TOU SP1	<p>Amend the policy to read:</p> <p>1.Sustainable tourism development will be encouraged where it protects alongside promoting the main tourism assets of;</p> <p>a the waterfronts – the coast, rivers and estuaries,            b the complimentary visitor uses of the fertile coastal plain in conjunction with agriculture, and            c the backdrop and access for visitors to the South Downs National Park with the historic town of Arundel as it's focal point, that make the District attractive to visitors.</p>	No change to SA scores as a result of the further Main Modification.			

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			<p>2 Proposals for visitor related development will be determined by Arun's capacity to absorb such growth; for Arun this means tourism growth which:</p> <ul style="list-style-type: none"> <li>a Encourages long-term visitor interest / activity;</li> <li>b Ensures a viable visitor economy;</li> <li>c Provides benefit to local people;</li> <li>d Extends the visitor season; and</li> <li>e Protects and enhances the natural and built environment of Arun.</li> </ul>				
MM 19	10	TOU DM1	<p>Amend part 'a' of the policy to read:</p> <p>1. Visitor attractions, facilities and accommodation <del>scale, priority location and Change of Use</del>  <u>"Proposals for development, including expansion, which are likely to attract visitors (such as leisure or cultural facilities) will be supported provided that they:</u></p> <ul style="list-style-type: none"> <li><u>a. are in accessible locations;</u></li> <li><u>b. are accompanied by workable and realistic travel plans;</u></li> <li><u>c. address visitor management issues; and</u></li> <li><u>d. achieve good design.</u></li> </ul> <p><del>All proposals for development, including expansion, which are likely to attract visitors (such as leisure or cultural facilities) will demonstrate that they are in accessible locations and will be accompanied by workable and realistic travel plans, address visitor management issues and achieve good design.</del></p> <p>Larger scale proposals will generally be directed towards the Economic Growth Areas of Littlehampton and Bognor Regis. Smaller scale development, <del>scalable according to relative impact,</del> may be suitable in other areas of the District including Arundel.</p> <p>Excepting Permitted Development Rights or Local / Neighbourhood Development Orders, existing visitor attractions, facilities and accommodation (except <del>Camping and Caravan Sites holiday caravan sites</del>), <del>will only be granted planning permission for a change of use that continues a visitor offer unless: it is demonstrated that the use is no longer required and is unlikely to be reused or redeveloped for visitor purposes. This will include a clear demonstration of marketing, viability appraisal and the suitability of the site to accommodate the alternative use – using a methodology agreed by the District Council. The Council will require evidence that the site has not been made deliberately unviable, that marketing has been actively conducted for a reasonable period of time and that alternative visitor uses have been fully explored.</del> <u>will not be granted planning permission for a change of use that leads to the loss of a visitor offer unless it is demonstrated that the use is no longer required and the site is unlikely to be reused or redeveloped for visitor purposes. To demonstrate these requirements, the Council will require:</u></p> <ul style="list-style-type: none"> <li><u>e. that alternative visitor uses have been fully explored;</u></li> <li><u>f. an appraisal indicating that the use is no longer viable;</u></li> <li><u>g. evidence that the site has not been made deliberately unviable; and</u></li> </ul>	No change to SA scores as a result of the further Main Modification.			

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			<p>h. <del>evidence of the suitability of the site to accommodate the alternative use.</del></p> <p>Replace references to 'holiday caravan sites' with 'Camping and Caravan Sites'</p> <p>Delete the first paragraph of part 2 of the policy: <del>Visitor related development can play an important role in rural diversification. The quality of Arun's natural environment draws many visitors. It is necessary to balance the provision of visitor facilities against the need to safeguard the landscape, character and environment of Arun, including the setting of the South Downs National Park and green infrastructure sites, both alongside the coast and inland.</del></p>				
MM 20	11	HOR DM1	<p>In the final paragraph amend the text as follows:</p> <p>"... will be considered on a case by case basis <u>against Policy C SP1. To reduce the impact on the sector, Applicants/Landowners ....</u>"</p>		No change to SA scores as a result of the further Main Modification.		
MM 21	11	EQU DM1	<p>Delete criteria g and h:</p> <p><del>g. The applicant has submitted an options appraisal, to demonstrate that the site and location is a better option for the proposed development than the alternatives; and</del></p> <p><del>h. The Council will impose conditions and/or use planning obligation agreements to ensure should the equestrian use cease, the land must be left capable of being restored to a productive green environment."</del></p>		No change to SA scores as a result of the further Main Modification.		
MM 22	12	12.1.5 and 12.1.6	<p>Replace paragraph 12.1.5 with the following text:</p> <p><u>"The final policy target takes account of the objectively assessed housing need (OAN), some housing for other authorities to meet the Duty to Cooperate with a 20% buffer. Planning Practice Guidance promotes the approach that if there is an under-supply it should be dealt with in the first five years but as this is not possible with the strategy in this Local Plan, the housing supply is spread across the plan period to match the planned delivery of sites. There are targets for each five year period in policy H SP1 but these deliver the whole plan target of at least 20,000 homes by 2031."</u></p> <p>Amend the last bullet point of paragraph 12.1.6 to read:</p> <p><u>Non-Strategic Sites – The majority of sites will accommodate sites of less than 300 dwellings to and be allocated through Neighbourhood Plans or a Non-Strategic Site Allocations DPD.</u></p>		No change to SA scores as a result of the further Main Modification.		
MM 23	12	Table 12.1	<p>Amend the row related to 'Non-Strategic Sites' to include a reference to 'at least', so that it reads:</p> <p>Non-Strategic Sites At least 1,250</p>		No change to SA scores as a result of the further Main Modification.		
MM 24	12	12.1.8	<p>Delete paragraph 12.1.8 and replace with:</p> <p><u>The Council will commence the production of a Non-Strategic Site Allocations DPD immediately after the adoption of the Local Plan for those areas of the District which will not be covered by up-to-date Neighbourhood Plans. The Non-Strategic Site Allocations DPD will allocate sufficient sites to meet any identified shortfall, in accordance with the Local Plan housing trajectory.</u></p>		No change to SA scores as a result of the further Main Modification.		

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MM 25	12	H SP1	Amend Policy H SP1 as follows: Change the title to 'The Housing Requirement'. Amend first paragraph to state 'Within the plan period 2011-2031 <u>at least</u> 20,000 new homes will be accommodated in the District. Delivery will be phased over the plan period as follows.' Amend the years within the table to reflect the periods that HLS figures are collected e.g. 2011/12 to 2015/16, 2016/17 to 2020/21 etc to 2032. Move the table from 12.1.11 and insert it into the policy box. Delete the last paragraph of the policy and replace with the following: <u>'Additional non-strategic allocations will be made across the District through emerging Neighbourhood Plans or reviews of made Neighbourhood Plans. On adoption of the Local Plan the Council will assess progress on Neighbourhood Plans and immediately commence the production of a Non-Strategic Site Allocations DPD for those areas of the District which will not be covered by up-to-date Neighbourhood Plans'.</u>	No change to SA scores as a result of the further Main Modification.			
MM 26	12	12.1.12	<u>New paragraph 12.1.12</u> <u>"The Council will monitor housing delivery against the housing trajectory for the District using the indicators specified in the Monitoring Framework set out in the Local Plan. If the Authority Monitoring Report (AMR) demonstrates that annual housing delivery is less than 75% of the annualised requirement or the projected completion rate (whichever is the lower) in three consecutive years (based on the trajectory set out in picture 12.1 of this Plan and in Appendix A to the Housing Implementation Strategy), the Council will undertake a partial review of this Plan. In undertaking this review, the Council will ensure that sufficient infrastructure capacity is available and that the potential allocation of additional housing sites will not prejudice delivery of the infrastructure required by this Plan."</u>	No change to SA scores as a result of the further Main Modification.			
MM 27	12	H SP2	Amend criteria c. to read: 'c. <u>protects, conserves or enhances</u> the natural environment, landscapes and biodiversity," Amend criteria k to read: k. address the off-site capacity requirements, that relate to that particular allocation, identified in the Arun Transport Assessment (2016 and update 2017 and subsequent relevant assessments) and the local highway network,  Amend criteria p. to read: "p. <u>include consider inclusion of</u> an area of the sites for Self-Build and Custom Build, and'  Delete the last paragraph as follows: <del>The Council requires well-designed development employing a modern approach to principles of the Garden City movement. Development proposals shall be consistent with all other Local Plan policies."</del>	No change to SA scores as a result of the further Main Modification.			
MM 28	12	12.1.15	Amend the first sentence to read:	7. Biodiversity and Geodiversity	--?/+	+	Added text includes recognition of proximity to Pagham Harbour SPA and potential

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			<p>"The Pagham North site consists of a number of parcels of land which will be <del>developed in conjunction</del> <u>planned comprehensively</u> with each other to ensure that a suitable development is provided."</p> <p>Add the following text to the end of the paragraph:  <u>The Pagham South allocation is in close proximity to Pagham Harbour, which is an important and sensitive natural site within the wider Bognor Regis area. Development from this allocation should reduce any impacts of recreational disturbance that may arise.</u></p>				impacts
MM 29	12	H SP2a (SD1 and 2)	<p>Insert table with reference number, location and number of units</p> <p>Pagham (SD1 Pagham South and SD2 Pagham North) Located to the west of the urban area of Bognor Regis, the Pagham South and Pagham North Strategic Allocations will collectively provide at least 1,200 dwellings over the plan period. Both sites consist a of number parcels of land, it is imperative that individual areas are aligned with neighbouring parcels of land. The sites lie in close proximity and are within the drainage catchment of the internationally designated Pagham Harbour site which has drainage and waste water implications. Development proposals will need to meet the following key design and infrastructure requirements;</p> <p><del>a. take account of the proximity of Pagham Harbour SPA/Ramsar including with new accessible green spaces which shall be incorporated into or adjacent to the development to mitigate impacts, ensure no detrimental impact to Pagham Harbour SPA through compliance with ENV DM2 (Pagham Harbour) and its supporting text,</del></p> <p>b. be designed to take into account nearby heritage assets, including Church Barton House and its setting,</p> <p>c. provide a new one-form (expandable to two-form) entry primary school and nursery places</p> <p>d. provide a care home facility,</p> <p>e. provide a Community Hub to meet identified local need on-site which includes;</p> <p>i. shops and complimentary uses,</p> <p>ii. <u>a</u> community building (<u>Tier 7</u> library, D1/sui generis floorspace),</p> <p>iii. provision of land for a scout hut, and</p> <p>iv. land for an Ambulance Community Response Post facility and contributions towards new healthcare facilities at West of Bersted (SD3),</p> <p>Alternatively, where appropriate proposals may make a contribution towards new facilities or the improvement or expansion of the relevant existing facilities, subject to agreement with the Council.</p>	7. Biodiversity and Geodiversity	--?/+	+	Added text includes recognition of proximity to Pagham Harbour SPA and potential impacts

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			<p>f. provision of public open space including children's play areas, landscaping, drainage and earthworks, <del>and</del></p> <p>g. contribute to the provision of an enhanced local cycle network by making on site provision and appropriate off site financial contribution <u>and</u></p> <p><u>h. where possible, provide linkages and accessible pedestrian and cycle routes to Bognor Regis town centre in order to enhance the sustainability of the site and to support town centre regeneration initiatives.</u></p>				
MM 30	12	H SP2a (SD3)	<p><b>West of Bersted (SD3 West of Bersted)</b></p> <p>Located to the north of Bognor Regis this largest allocation will provide at least 2,500 dwellings over the plan period. Development proposals will need to meet the following key design and infrastructure requirements:</p> <p>a. provide a new three-form entry primary school and nursery places,</p> <p>b. provide a new 3G pitch facility to serve the west of the District,</p> <p>c. incorporate two new sports pitches and facilities,</p> <p>d. provide a Community Hub to meet identified local need on-site which includes:</p> <p>i. shops</p> <p>ii. provision for new healthcare facilities to serve West of Bersted (SD3) and Pagham South and North (SD 1 &amp; 2)</p> <p>iii. <del>provision</del> <u>of a new Tier 7 library facility</u> ,</p> <p>e. provide a road/pedestrian/cycle link between the A259 and Chalcraft Lane including facilitating the cycle route to Pagham and enhancing the A259 cycle route,</p> <p>f. improvements to the A259 between Bersted and Drayton</p> <p>g. <del>take account of the proximity of Pagham Harbour SPA/Ramsar</del> <u>ensure no detrimental impact to Pagham Harbour SPA, through compliance with ENV DM2 (Pagham Harbour) and its supporting text</u></p> <p>h. incorporate planned new employment provision; <u>and</u></p> <p><u>i. where possible, provide linkages and accessible pedestrian and cycle routes to Bognor Regis town centre in order to enhance the sustainability of the site and to support town centre regeneration initiatives.</u></p>	6. Transport	++	++/-	See text added at criteria (e) and (f) which support road development
				7. Biodiversity and Geodiversity	--?/+	+	See criterion (g)
				10. Air	+	++/-	See text added at criteria (e) and (f) which support road development
MM 31	12	H SP2b (SD4)	<p>Littlehampton – West Bank (SD4)</p> <p>Amend as follows:</p> <p>f. provide a Community Hub to meet identified local need on-site which includes</p> <p>i. shops,</p> <p>ii. a new <u>Tier 7</u> library facility, and</p> <p>iii. new healthcare facilities,</p> <p>h. <u>provide open space at the western end of the allocation (north of Ferry Road and south of A259)</u></p>	No change to SA scores as a result of the further Main Modification.			

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			q. enable where possible the reduction of flood risk to the existing communities <u>on the West Bank</u> , and				
MM 32	12	H SP2c (SD5)	Barnham/Eastergate/Westergate (SD5) Amend criteria a as follows:  a. conserve the unique character and the separation of the three villages <u>of Barnham Eastergate and Westergate</u> . Eastergate and Barnham should be protected from a continuous urban form / coalescence along the north and south aspects of the B2233,	No change to SA scores as a result of the further Main Modification.			
MM 33	12	H SP2c (SD6)	Fontwell (SD6) Delete criterion 'b':  <del>b. contributions towards new healthcare facilities which will be incorporated at BEW(SD5).</del>	2. Health and Wellbeing	++/-	+/-	Deletion of criterion (b)
MM 34	12	H SP2c (SD7)	Yapton (SD7) Amend criteria a and b as follows:  a. provide a one-form entry primary school and nursery places <u>either on-site, or by making a contribution towards new facilities or the improvement or expansion of the relevant existing facilities,</u>  b. a new <u>Tier 7</u> library facility <u>to meet identified local need either on-site, or by making a contribution towards new facilities or the improvement or expansion of the relevant existing facility,</u>	15. Economy, Employment and Education	++	+	Amendment of text in criteria (a) and (b) reduces the contribution towards this SA objective
MM 35	12	H SP2c (SD8)	Ford (SD8) Amend criteria b and c, as follows:  c. provide a Community hub to meet identified local need which includes: i. new retail, commercial and community facilities, ii. a new <u>Tier 7</u> library facility, and iii. <del>provision</del> <u>of new healthcare facilities for Ford (SD8), Yapton (SD7) and Climping (SD10),</u> <u>Alternatively, where appropriate, proposals may make a contribution towards new facilities or the improvement or expansion of the relevant existing facilities, subject to agreement with the Council.</u>  Include two new criteria: h. <u>reflect the historic alignment of the canal; and</u> i. <u>maintain visual separation between Ford and Yapton, and between Climping and Ford</u>	No change to SA scores as a result of the further Main Modification.			
MM 36	12	H SP2c (SD9)	Angmering North (SD9) Amend the criteria to read:  a. explore opportunities to provide library access <del>in a community building</del> <u>to meet identified local need firstly by the improvement or expansion of the relevant existing facilities or on-site or by making a contribution towards new facilities.</u> b. extend the existing local village health facilities in the locality,	13. Landscape	+/-	+	See criterion (e)
				15. Economy, Employment and Education	+/-	++	See criteria (a) and (f)

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			<p>c. accommodation for nursery places <u>linked to the primary school provision, and</u></p> <p>d. primary school provision (1 FE expandable to 2FE to serve Angmering North SD9 and Angmering South and East SD11) <u>either on-site, or by making a contribution towards new facilities or the improvement or expansion of the relevant existing facilities.</u></p> <p>e. <u>be supported by a detailed Landscape Appraisal which has regard to the special qualities of the South Downs National Park, and must include landscape mitigation measures which address harmful impacts identified within the Appraisal</u></p> <p>f. <u>Incorporate planned new employment provision in conjunction with EMP SP3</u></p> <p>g. <u>be supported by a detailed Landscape Appraisal which has regard to the special qualities of the South Downs National Park, and must include landscape mitigation measures which address harmful impacts identified within the Appraisal.</u></p>				
MM 37	12	H SP2c (SD10)	<p>Climping (SD10)</p> <p>Amend criterion a:</p> <p><del>a. provide a new one form (expandable to two form) entry primary school and nursery places contributions to the existing primary school</del></p>	2. Health and Wellbeing	++/-	+/-	See criterion (c iii), no longer being provided on site
			<p>Amend criterion c to read:</p> <p>c. provide a Community hub to meet identified local need which includes:</p> <p>i. new retail, commercial and community facilities,</p> <p>ii. a new <u>Tier 7</u> library facility, and</p> <p>iii. contributions towards new healthcare facilities which will be provided in Ford (SD8).</p> <p>d. <del>and,</del> provide a controlled crossing on the A259.</p>				
MM 38	12	H DM1	<p>Add additional paragraph to Policy H DM1 that reads; <u>"Over the Plan period a proportion of the housing provided should be of a type that meet the needs, as identified in the most recent SHMA, of older people. Such housing could be provided as part of the general mix of one and two bedroomed homes but should be designed to meet the needs of older people."</u></p>	No change to SA scores as a result of the further Main Modification.			
MM 39	12	AH SP2	<p>Insert additional text into Policy AH SP2 at the end of the second paragraph;</p> <p><u>"The provision of affordable housing on a site at less than 30%, or on an alternative site or by way of a commuted sum will only normally be allowed in very exceptional circumstances if supported by robust evidence including, where appropriate, viability evidence."</u></p> <p>Amend the third paragraph of the policy to read: The Council will negotiate the affordable housing tenure mix on development sites from an initial <del>default</del> position of 75% rent and 25% intermediate <del>market</del> housing.</p> <p>Amend the last sentence of the fourth paragraph to read:</p>	No change to SA scores as a result of the further Main Modification.			

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			The affordable dwelling mix should comprise of the following range of homes <u>unless evidence indicates otherwise.</u>				
MM 40	12	H SP3	Add additional text at the beginning of the policy that states; " <u>This policy would only apply when the housing need cannot be met on allocated housing sites or in the built up area boundary</u> " Amend criteria h. to read: "Persons with <del>full time</del> <u>primary employment...</u> "	No change to SA scores as a result of the further Main Modification.			
MM 41	12	H SP4	Amend the first paragraph of the policy to read: "Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where <u>the proposals contribute to the creation of sustainable, inclusive and mixed communities and meet the following criteria</u> <del>they:</del> "  Delete criteria b.	No change to SA scores as a result of the further Main Modification.			
MM 42	12	H SP5	Insert the following at the beginning of HSP 5 as a first paragraph:  <u>Within the plan period 2011-2031 provision shall be made for at least 5 private pitches and 9 public pitches for gypsies and travellers and 7 plots for travelling showpeople in the District. Provision for at least 5 private pitches will be made on unallocated sites permitted in accordance with the criteria in 3 below:</u>  Amend the text in the policy so that references to Travellers and travelling Showpeople is consistent throughout the policy. This affects the following sections of the policy: 1. Planning permission will not normally be granted for development involving the loss of lawful accommodation for <u>Gypsy and Travellers</u> or Travelling Showpeople unless alternative provision is made to make good any loss. 2. Planning applications for <u>Gypsy and Traveller and Travelling Showpeople</u> sites to remove personal conditions, or to make temporary planning permissions permanent will normally be granted subject to the proposal complying with the criteria in 3 below. 3. Planning applications for <u>Gypsy and Traveller and Travelling Showpeople</u> sites shall: 4. A site for at least <del>14</del> <u>4</u> pitches for public <u>Gypsy and Traveller</u> provision will be identified. <del>and at least 10 public pitches will be allocated by 2017.</del> Arun District Council will produce a Gypsy and Traveller and Travelling Showpeople Site Allocations document (DPD) to identify land for permanent pitches to meet the need identified to 2027. 5. Where there is a lack of affordable land to meet local <u>Gypsy and Traveller</u> needs, the Council will consider allocating and releasing sites solely for affordable <u>Gypsy and Traveller</u> sites as part of the rural exceptions site policy approach. Such sites shall only be used for affordable <u>Gypsy and Traveller</u> sites in perpetuity. Mixed use shall not be permitted on rural exception sites.				

Main Modification Reference	Chapter	Policy / Paragraph Number	Proposed Modification (deleted text shown as <del>struck through</del> and additional text shown <u>underlined</u> .)	SA Objective	Main Mods SA Score	Further Main Mods SA Score	Explanation of score change	
MM 43	12	H DM3	<p>Amend the title of the policy to "Rural workers" and replace all references to "agricultural, forestry and horticultural to rural workers", as well as</p> <ul style="list-style-type: none"> <li>- deletion of criteria g under section 1</li> <li>- insertion of '<u>conversion or a</u>' under section 2</li> <li>- amend criteria within section 2 to say <u>conversion to or new dwellings</u></li> <li>- the deletion of bullet d from section 3; and</li> </ul> <p>Break the Policy in two to separate policies. Section 4 is used to form a new policy and renumbered.</p>	11. Soil	+/-	-	Change reflects separation of policy into two	
MM 44	12	H DM4	Take section 4 from H DM3 and name as H DM4 (new policy)	1. Communities	0	0	Assessment of new policy	
				2. Health and Wellbeing	+/-	-		
				3. Housing	++	++		
				4. Social Infrastructure	-	-		
				5. Regeneration	0	0		
				6. Transport	-	+/-		
				7. Biodiversity and Geodiversity	-?	+		
				8. Water	+/-	-		
				9. Flooding	+/-	-		
				10. Air	-	-		
				11. Soil	+/-	+/-		
				12. Historic Environment	+	+		
				13. Landscape	+	+		
				14. Waste and Resources	+	+		
				15. Economy, Employment and Education	++	0		
MM 45	13	D DM2	Delete the following from D DM2: "...will provide guidance, <del>but development will be encouraged to make the most efficient use of land</del> "	No change to SA scores as a result of the further Main Modification.				
MM 46	13	D DM3	Delete Policy D DM3 and supporting text.	Policy deleted.				
MM 47	14	OSR DM1	Delete existing policy and replace with:					
			<p><u>1. Protection of open space, outdoor and indoor sport, community, arts and cultural facilities.</u></p> <p><u>Existing open space, outdoor and indoor sport, community, arts and cultural facilities should not be built on or redeveloped for other uses unless:</u></p> <p><u>a. a robust and up-to-date assessment has been undertaken which has clearly shown the facilities to be surplus to requirements; or</u></p> <p><u>b. the loss resulting from the proposed development would be replaced by equivalent or better provision of open space, outdoor and indoor sport, community arts and cultural facilities, which will be assessed in terms of quantity and quality and suitability of location; or</u></p> <p><u>c. the development is for alternative open space, sports, community, arts or cultural provision, the needs for which clearly outweigh the loss.</u></p>	5. Regeneration	?	+	Amended policy protects and provides new community facilities which support vibrancy of town centres	

Main Modification Reference	Chapter	Policy / Paragraph Number	Proposed Modification (deleted text shown as <del>struck through</del> and additional text shown <u>underlined</u> .)	SA Objective	Main Mods SA Score	Further Main Mods SA Score	Explanation of score change
			<p><u>2. Open space, sport and recreation in new developments</u></p> <p><u>Housing and, where viable, commercial development will be required to contribute towards:</u></p> <p><u>a. Open space provision in accordance with guidance set out in the current Open Space Study. In some parts of the District open space provision is identified as being sufficient in terms of quantity. Therefore, provision of new open space is not deemed necessary but what is needed is to seek contributions for quality improvements and/or new offsite provision in order to address any future demand. For larger scale developments, the quantity standards should be used to help determine the requirements for open space provision as part of that development.</u></p> <p><u>b. Playing pitch provision in accordance with guidance set out in the Playing Pitch Strategy. This will include improvements to existing provision to increase playing capacity and providing hubs of new pitches.</u></p> <p><u>c. Indoor sport and leisure facilities through financial contributions in accordance with guidance set out in the Indoor Sport and Leisure Facilities Strategy which identifies a need for a new leisure centre in the West of the District.</u></p> <p><u>d. Strategic projects identified in the Leisure and Cultural Strategy.</u></p> <p><u>3. Local Green Space and Neighbourhood Plans</u>  <u>Local Green Space is not identified in this Local Plan but will be designated in Neighbourhood Plans in circumstances where the criteria in paragraphs 76 and 77 of the National Planning Policy Framework are met.</u></p> <p><u>4. Quality expectations</u></p> <p><u>Developments with respect to all of the above shall have regard to the 'Secured by Design' guidance documents and shall also be consistent with all other Local Plan policies.</u></p>				
MM 48	16	HER SP1	<p>Amend the first paragraph to read:  The Local Planning Authority will grant planning permission or relevant consent for development proposals that conserve or enhance the historic environment of the District, <u>based on the following approach specifically:</u></p> <p>delete criteria a-d and replace with:</p>		No change to SA scores as a result of the further Main Modification.		

Main Modification Reference	Chapter	Policy / Paragraph Number	Proposed Modification (deleted text shown as <del>struck through</del> and additional text shown <u>underlined</u> .)	SA Objective	Main Mods SA Score	Further Main Mods SA Score	Explanation of score change
			<p><del>"- Designated heritage assets including listed buildings, structures and their settings; and Conservation Areas will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance.</del></p> <p><del>- Non-designated heritage assets, including locally listed heritage assets (Buildings or Structures of Character and Areas of Character), and their settings will also need to be conserved and enhanced in a manner appropriate to their significance and contribution to the historic environment."</del></p> <p>Final paragraph should be amended "... not be permitted..." delete rest of sentence. Replace with <u>unless it can be demonstrated that the loss or harm achieves substantial public benefits.</u></p> <p>Final paragraph should be amended to read: Development proposals involving the demolition of Listed Buildings or substantial harm to a Conservation Area will not be permitted <del>other than in exceptional circumstances where repair or re-use are not practicable options and where replacement buildings and uses of exceptional quality are proposed</del> <u>unless it can be demonstrated that the loss or harm achieves substantial public benefits.</u></p>				
MM 49	16	HER DM1	<p>Amend last paragraph to read: "The Local Planning Authority will only approve a proposal for enabling development where there is no other alternative option available and the benefits of such as scheme outweigh any dis-benefits that arise. <u>In determining any application the Local Planning Authority will take into account whether:</u></p> <p><u>it will materially harm the significance of the heritage asset or its setting;</u> <u>it will avoid detrimental fragmentation of management of the heritage asset;</u> <u>it will secure the long term future of the heritage asset and, where applicable, its continued use for a purpose sympathetic to its conservation;</u> <u>it is necessary to resolve problems arising from the inherent needs of the heritage asset, rather than the circumstances of the present owner, or the purchase price paid;</u> <u>there is a source of funding that might support the heritage asset without the need for enabling development; and</u> <u>the level of development is the minimum necessary to secure the future conservation of the heritage asset and of a design and type that minimises harm to other public interests."</u></p>				No change to SA scores as a result of the further Main Modification.
MM 50	16	HER DM2	HER DM2 refer to ' <u>Locally Listed Buildings</u> ' in the 3rd paragraph.				No change to SA scores as a result of the further Main Modification.

Main Modification Reference	Chapter	Policy / Paragraph Number	Proposed Modification (deleted text shown as <del>struck through</del> and additional text shown <u>underlined</u> .)	SA Objective	Main Mods SA Score	Further Main Mods SA Score	Explanation of score change
			Add an additional sentence to the end of the 3rd paragraph: <u>'There may be circumstances where the public benefit from the proposed development outweighs any proposed harm. In such circumstances, the proposal will need to be justified as appropriate.'</u>				
MM 51	16	HER DM4	Rename the policy and references within it to <u>'Areas of Character'</u>		No change to SA scores as a result of the further Main Modification.		
MM 52	17	ENV DM1	Insert the following between the first two sentences of the first paragraph: <u>"...(either individually or in combination with other developments), will not normally be permitted. Consideration will be given to the exact designated features present on the site, their scarcity/rarity and recognition of the protection offered by their existing status. Exception will only be made for those with the highest value where the following can be demonstrated..."</u>		No change to SA scores as a result of the further Main Modification.		
MM 53	17	17.1.19	Insert the following at the end of paragraph 17.1.19 <u>"...summer breeding and wintering ground for wildfowl. As such, to ensure no detrimental impacts through the loss of supporting habitat, development within close proximity to the boundary of Buffer Zone A for Pagham Harbour SPA, will need to prove the site is not used regularly by birds. To do this information on the cropping regime, frequency of planting favoured by Brent Geese, sources of disturbance, openness of the site and at least one seasons wintering surveys will need to be provided. Where results show frequent use, an additional winter bird survey should be carried out and mitigation design aspects incorporated, to enable informed judgments to be made."</u>		No change to SA scores as a result of the further Main Modification.		
MM 54	17	ENV DM2	Criteria b - ii. to read as follows: <del>"create easily accessible new green spaces for recreation within or adjacent to the development site, or to make developer contributions towards the provision of such green spaces to serve the area. These shall be capable of accommodating the predicted increases in demand for local walking, including dog walking. Good pedestrian links shall be provided between housing areas and new and existing green space in order to discourage car use.."</del>  Amend criterion c to read <u>"c. Large scale developments Major developments ( As defined in the GPDO 1995 as amended) taking place outside Zone B and close to its boundary will be considered on a case by case basis to determine any potential effects on Pagham Harbour, and the need for any avoidance or mitigation measures."</u>		No change to SA scores as a result of the further Main Modification.		
MM 55	18	18.2.8	Insert the following at the end of paragraph 18.2.8: <u>"Southern Water has an interim solution to ensure that recent approvals/existing commitments in this catchment can be delivered through connections to the existing plant, until it reaches the existing flow permit level. In the long term it is currently expected that development at BEW (SD5) will be connected through a new pipe to the treatment plant at Ford."</u>  Insert a new paragraph 18.2.9:		No change to SA scores as a result of the further Main Modification.		

Main Modification Reference	Chapter	Policy / Paragraph Number	Proposed Modification (deleted text shown as <del>struck through</del> and additional text shown <u>underlined</u> .)	SA Objective	Main Mods SA Score	Further Main Mods SA Score	Explanation of score change
			" <del>Since the majority of the allocated housing in the Plan will connect to the Ford wastewater treatment works, development in the allocated site (SD8) will have to be carefully designed. The layout of the allocation will need to reflect the outcomes of an odour assessment, so as not to impact on residential amenity, leisure or recreational activities of residents or visitors to the District. In addition, it should not prejudice the operation of or the expansion of the treatment plant, as required to accommodate future growth in the District.</del> "				
MM 56	18	W DM2	Amend criteria c. to state " <u>The sustainability benefits to the wider community are clearly identified.</u> <del>The scheme identifies adaptation and mitigation measures.</del> "		No change to SA scores as a result of the further Main Modification.		
MM 57	18	W DM3	Insert new criteria following 'e' " <u>be maintained in perpetuity, supported through a Maintenance and Management Plan/Regime, including its financing, agreed with the Local Planning Authority.</u> "		No change to SA scores as a result of the further Main Modification.		
MM 58	20	WM DM1	Delete the 3rd paragraph of the policy as follows: <del>All major residential development will be required to contribute towards the provision of recycling and general waste bins through planning conditions.</del>		No change to SA scores as a result of the further Main Modification.		
MM 59	22	22.0.9 and INF SP1	Add the additional text to paragraph 22.0.9 to read: <u>To secure a mechanism for contributions towards infrastructure the Community Infrastructure Levy (assuming it is retained), will be introduced as soon as possible after the adoption of this Local Plan. The levy will be needed to seek contributions for small sites which are essential to meet the housing needs in the medium term so it is essential that CIL is introduced no later than mid-way through the second housing delivery phase as shown on table 12.1 and policy H SP1.</u>  Rewrite the 4th bullet point of INF SP1 to read: <u>Where a contribution towards other district wide infrastructure improvements or provision is needed and viable this will be achieved through the Community Infrastructure Levy (assuming it is retained) Charging Schedule and Regulation 123 Infrastructure List which will be introduced as soon as possible after the adoption of this Local Plan. Until such time as a Charging Schedule is adopted contributions will be achieved through planning obligations (where they meet the statutory tests).</u>		No change to SA scores as a result of the further Main Modification.		
MM 60	22	22.0.17	Insert a new sub-section under 'Drainage and flood mitigation' and 'Transport' to cover wastewater as below: <b><u>Wastewater</u></b>  <u>The water industry's investment planning is scheduled on a 5 yearly basis and from 2018 there will be a flat rate applied per new dwelling, by utility providers. This timing allows for repeated opportunities throughout the lifetime of the Plan to review the requirements at Ford wastewater treatment plant.</u>		No change to SA scores as a result of the further Main Modification.		

Main Modification Reference	Chapter	Policy / Paragraph Number	Proposed Modification (deleted text shown as <del>struck through</del> and additional text shown <u>underlined</u> .)	SA Objective	Main Mods SA Score	Further Main Mods SA Score	Explanation of score change
			<del>Funding of the expected connection from the BEW allocation to the Ford treatment works would be anticipated to be funded jointly by Southern Water and the developers, on the basis of the developers overall contribution to the 2300 homes allocated to the site in the Plan period."</del>				
MM 61	22	INF SP2	Amend the first paragraph to read:	6. Transport	+	+/-	Changes to criterion (a iii) now includes all forms of travel, not only sustainable modes
			<del>A minimum of one 6 form entry Secondary School with expansion land for a 4 form entry expansion adjacent shall be provided on a site of at least 10 hectares to serve the new growth in Arun District. The broad location of search for a site is indicated on the policies map. The secondary school will be situated in Ford.</del>	10. Air	+	+/-	Changes to criterion (a iii) now includes all forms of travel, not only sustainable modes
			Amend criterion a. iii to read: Made accessible by <u>all forms of transport, including sustainable modes</u> <del>road and on foot to new and existing pedestrian and cycle routes to enable links</del> with the strategic sites.				
MM 62	-	Policy Map 3	Delete the university eastward expansion from Policies Map 3.	No change to SA scores as a result of the further Main Modification.			
MM 63	-	Policy Map 4	Amend the policies map to reflect the change is the size of the Angmering Employment Allocation (site 7)	No change to SA scores as a result of the further Main Modification.			

1.20 During the process of reviewing the scores in relation to policies affected by the further Main Modifications, SA scores for some other policies were subsequently revised as a consequence of this review process to achieve consistency. These changes are summarised in Error! Not a valid bookmark self-reference.. Also, the Vision and strategic objectives have been appraised in this version of the SA and their scores are summarised in Error! Not a valid bookmark self-reference..

**Table 3 Minor revisions to SA scores to ensure consistency**

Policy / Paragraph Number	SA Objective	Main Mods SA Score	Further Main Mods SA Score
Vision for the District	1. Communities	Unscored in Main Mods SA	+
	2. Health and Wellbeing		+
	3. Housing		+
	4. Social Infrastructure		+
	5. Regeneration		+
	6. Transport		+
	7. Biodiversity and Geodiversity		+
	8. Water		+
	9. Flooding		+
	10. Air		+
	11. Soil		+
	12. Historic Environment		+
	13. Landscape		+
	14. Waste and Resources		+
	15. Economy, Employment and Education		+
Strategic Objectives	1. Communities	Unscored in Main Mods SA	++
	2. Health and Wellbeing		+
	3. Housing		++
	4. Social Infrastructure		+
	5. Regeneration		++
	6. Transport		++
	7. Biodiversity and Geodiversity		+
	8. Water		+?
	9. Flooding		+?
	10. Air		+
	11. Soil		+?
	12. Historic Environment		++
	13. Landscape		++
	14. Waste and Resources		+
	15. Economy, Employment and Education		++
GI SP1	7. Biodiversity and Geodiversity	++	+
	11. Soil	+	++
SD SP3	12. Historic Environment	++	+
EMP SP2	3. Housing	0	+
RET SP1	3. Housing	0	+
RET DM1	9. Flooding	+	0
	12. Historic Environment	+	+/-?
	13. Landscape	0	+
	15. Economy, Employment and Education	++/-	++
TOU SP1	4. Social Infrastructure	+?/-?	++
	6. Transport	?	+
	10. Air	?	+
TOU DM1	9. Flooding	0	+
H SP2b (SD4)	5. Regeneration	+	++
	6. Transport	++	++/-
	10. Air	+	++/-
	14. Waste and Resources	+	+/-

Policy / Paragraph Number	SA Objective	Main Mods SA Score	Further Main Mods SA Score
H SP2c (SD5)	6. Transport	++	++/-
	10. Air	+	++/-
H SP2c (SD6)	4. Social Infrastructure	+	0
	5. Regeneration	+	0
	6. Transport	++	+
	15. Economy, Employment and Education	+/-	-
H SP2c (SD7)	2. Health and Wellbeing	++/-	+/-
	6. Transport	++	+/-
	10. Air	+	+/-
H SP2c (SD8)	6. Transport	++	+/-
	10. Air	+	+/-
H SP2c (SD9)	5. Regeneration	+	0
	6. Transport	++	+
H SP2c (SD10)	6. Transport	++	+/-
	10. Air	+	+/-
H SP2c (SD11)	15. Economy, Employment and Education	+/-	+
H DM3	1. Communities	0	+
	12. Historic Environment	+	+/-
	13. Landscape	+	+/-
H SP4	13. Landscape	0	+
OSR DM1	7. Biodiversity and Geodiversity	++	+
W SP1	10. Air	0	+

1.21 The previous SA considered two reasonable alternative site options for the allocation of strategic employment sites: RA1 – Enterprise Bognor Regis and Angmering, and RA2 – Enterprise Bognor Regis only. As the plan has progressed, both sites are allocated in the Arun Local Plan as strategic employment sites and therefore an individual assessment of the strategic employment site at Angmering was undertaken in December 2017. **Table 4** outlines the SA scores for the strategic employment site at Angmering.

**Table 4 SA findings for the strategic employment site at Angmering**

<b>SA Objectives</b>	<b>Angmering</b>
1. Achieve successful and inclusive communities.	+
2. Improve the health and wellbeing of the population and reduce inequalities in health	++/-
3. Ensure the delivery of high quality, sustainably constructed, and affordable homes	0
4. Ensure that Arun provides excellent social infrastructure	+?
5. Improve the vibrancy of Arun's town centres	0
6. Ensure efficient and sustainable movement within and beyond Arun	++?
7. Preserve, restore or enhance Arun's biodiversity and geodiversity	0?
8. Maintain and improve water quality, and maximise water efficiency measures	--?
9. Reduce flood risk	0
10. Reduce air pollution	-?
11. Avoid the loss of Best and Most Versatile agricultural land, reduce soil degradation/ contamination, and improve efficiency in land use	--
12. Protect and enhance the historic environment	-?
13. Maintain and enhance Arun's landscape character and quality	--?
14. Reduce the global, social and environmental impact of waste generation and consumption of resources by using sustainably produced and local products	-
15. Ensure a diverse and thriving economic base to support Arun's growth	++

- 1.22 A re-assessment of the strategic residential site at Angmering North was also undertaken excluding the strategic employment site, however, the SA scores were unaffected by this change. An assessment of Angmering South and East was also undertaken in December 2017 (see Error! Not a valid bookmark self-reference.).

**Table 5 SA findings for the residential site at Angmering South and East**

	<b>Angmering South and East</b>
<b>SA Objectives</b>	250 Units
1. Achieve successful and inclusive communities.	+
2. Improve the health and wellbeing of the population and reduce inequalities in health	++/--?
3. Ensure the delivery of high quality, sustainably constructed, and affordable homes	+
4. Ensure that Arun provides excellent social infrastructure	+?
5. Improve the vibrancy of Arun's town centres	0
6. Ensure efficient and sustainable movement within and beyond Arun	++?
7. Preserve, restore or enhance Arun's biodiversity and geodiversity	0?
8. Maintain and improve water quality, and maximise water efficiency measures	--?
9. Reduce flood risk	0
10. Reduce air pollution	--?
11. Avoid the loss of Best and Most Versatile agricultural land, reduce soil degradation/ contamination, and improve efficiency in land use	--
12. Protect and enhance the historic environment	-?
13. Maintain and enhance Arun's landscape character and quality	--?
14. Reduce the global, social and environmental impact of waste generation and consumption of resources by using sustainably produced and local products	-
15. Ensure a diverse and thriving economic base to support Arun's growth	++/--

### Stage A: Scoping

- 1.23 The scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:
- Plans, programmes and environmental protection objectives of relevance to the Local Plan were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
  - Baseline information was collected on environmental, social and economic issues.
  - Key sustainability issues for the District were identified.
  - A Sustainability Appraisal Framework was presented, comprising the SA objectives against which sites and subsequently policies would be appraised.
  - An assessment of the compatibility of the strategic objectives in the Local Plan and the SA objectives in the SA Framework was presented.

- 1.24 The SA process for the Arun Local Plan began in 2005 with the production of a Scoping Report for the former 'Core Strategy' Issues and Options. Unfortunately, the resultant SA Framework was fairly generic in its application. Since 2005, two significant factors arose: firstly the South East Plan increased Arun's housing requirement, and secondly plans to develop an Eco-Town at Ford were proposed in response to the Government's Eco-Town Programme. In 2008, a Scoping Report for the Core Strategy was undertaken by EDAW and AECOM superseding the work undertaken in 2005.
- 1.25 The SA Scoping Report for the Local Plan was published in November 2008 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and English Heritage (now Historic England)) and other interested parties. An updated version of the Scoping Report dated March 2009 was then published.
- 1.26 As a detailed SA of the emerging Arun Local Plan was already undertaken and due to the tight timeframe for completing the revised SA within the suspended Examination period, it was considered appropriate to set out the scope of this SA work for the Local Plan in the form of a 'Scoping Statement'. The [Scoping Statement](#) was produced by LUC in June 2016 and sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) for comment. The consultation responses<sup>9</sup>, which were generally supportive of the changes made, are presented in **Appendix 11** of the full SA Report.
- 1.27 **Table 6** presents the updated version of the SA Framework for the further Main Modifications to the Arun Local Plan, increasing the total number of SA headline objectives from seven to 15. All of the topics specifically required by the SEA Regulations are clearly addressed by the headline SA objectives. They have been re-ordered to ensure that the headline objectives provide a clear and focused appraisal of each policy or proposal in the Arun Local Plan. The review of the SA objectives has sought to avoid duplication and any single SA objective covering too many issues (as this would result in mixed effects being identified for that SA objective, which makes comparison between scores for different options difficult). The SA headline objectives have been organised into three distinct groups covering social, environmental and economic issues. The number of sub-objectives has reduced from 51 to 40, but the topics covered by the sub-objectives are still all addressed within the revised headline and sub-objectives.
- 1.28 The wording of some of the objectives has been revised since the Scoping Statement to take into account the suggestions of the statutory consultees.

**Table 6 SA Framework for the Arun Local Plan**

Headline SA Objective	Sub-objectives	SEA Topics covered by SA Objective
<b>Social</b>		
1. Achieve successful and inclusive communities.	<p>Will the option, policy or site assist in reducing poverty and social exclusion in Arun?</p> <p>Will the option, policy or site assist in reducing actual levels of crime and reducing the fear of crime?</p> <p>Will the option, policy or site create more balanced communities where communities feel empowered?</p>	<p>Population</p> <p>Human health</p>
2. Improve the health and wellbeing of the population and reduce inequalities in health.	<p>Will the option, policy or site improve access to doctor's surgeries and health care facilities?</p> <p>Will the option, policy or site encourage healthy lifestyle and provide opportunities for sport and recreation?</p> <p>Will the option, policy or site avoid impacts on the quality and extent of existing recreational assets such as formal or informal footpaths?</p> <p>Will the option, policy or site reduce noise</p>	<p>Population</p> <p>Human health</p>

<sup>9</sup> Consultation responses were received from Natural England and Historic England only.

Headline SA Objective	Sub-objectives	SEA Topics covered by SA Objective
	pollution?	
3. Ensure the delivery of high quality, sustainably constructed, and affordable homes.	<p>Will the option, policy or site contribute to meeting Arun's unmet housing requirements?</p> <p>Will the option, policy or site increase the supply of affordable homes?</p> <p>Will the option, policy or site encourage a mixed use and range of housing tenure?</p> <p>Will the option, policy or site provide high quality and sustainably constructed homes?</p>	<p>Population</p> <p>Human health</p>
4. Ensure that Arun provides excellent social infrastructure.	<p>Will the option, policy or site provide good access to community services and facilities (e.g. education, health services, shopping, leisure, green spaces, and culture) decreasing the need to travel?</p>	<p>Population</p> <p>Human health</p>
5. Improve the vibrancy of Arun's town centres.	<p>Will the option, policy or site contribute to regeneration objectives of Bognor Regis and Littlehampton?</p> <p>Will the option, policy or site promote development in key sectors (e.g. retail)?</p> <p>Will the option, policy or site provide, protect or enhance locations for cultural and leisure activities?</p>	<p>Population</p> <p>Human health</p>
6. Ensure efficient and sustainable movement within and beyond Arun.	<p>Will the option, policy or site promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?</p>	<p>Human Health</p> <p>Air</p> <p>Climatic factors</p>
<b>Environmental</b>		
7. Preserve, restore or enhance Arun's biodiversity and geodiversity.	<p>Will the option, policy or site help to preserve, restore, or enhance biodiversity assets, and species diversity?</p> <p>Will the option, policy or site ensure that current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced?</p> <p>Will the option, policy or site preserve, restore or enhance locally, nationally or internationally designated nature conservation and geological sites?</p>	<p>Biodiversity</p> <p>Flora</p> <p>Fauna</p>
8. Maintain and improve water quality, and maximise water efficiency measures.	<p>Will the option, policy or site improve the water quality of the district's rivers, coastline, and inland water?</p> <p>Will the option, policy or site maximise water efficiency measures including enabling recycled water to be used?</p> <p>Will the option, policy or site improve beach quality?</p> <p>Will the option, policy or site improve the coastal protection standard of the area?</p>	<p>Water</p> <p>Climatic factors</p>
9. Reduce flood risk.	<p>Will the option, policy or site reduce the risk of flooding from tidal, fluvial, and surface water sources?</p> <p>Will the option, policy or site reduce the risk of inappropriate development in the flood plain?</p>	<p>Water</p> <p>Soil</p> <p>Climatic factors</p> <p>Human health</p>
10. Reduce air pollution.	<p>Will the option, policy or site improve air quality?</p>	<p>Air</p> <p>Climatic factors</p> <p>Human health</p>

Headline SA Objective	Sub-objectives	SEA Topics covered by SA Objective
11. Avoid the loss of Best and Most Versatile agricultural land, reduce soil degradation/contamination, and improve efficiency in land use.	<p>Will the option, policy or site ensure land is remediated where appropriate?</p> <p>Will the option, policy or site avoid the loss of Best &amp; Most Versatile agricultural land to development?</p> <p>Will the option, policy or site improve efficiency in land use through the re-use of previously developed land and existing buildings?</p>	<p>Soil</p> <p>Climatic factors</p>
12. Protect and enhance the historic environment.	<p>Will the option, policy or site protect, enhance and restore Arun's designated heritage assets and their setting?</p> <p>Will the option, policy or site preserve archaeological features?</p>	<p>Cultural heritage, including architectural and archaeological heritage</p>
13. Maintain and enhance Arun's landscape character and quality.	<p>Will the option, policy or site protect, enhance, and restore the distinctive character of Arun's settlements, built environment and, landscapes?</p>	<p>Landscape</p>
14. Reduce the global, social and environmental impact of waste generation and consumption of resources by using sustainably produced and local products.	<p>Will the option, policy or site promote sustainable waste management practices through a range of waste management facilities?</p> <p>Will the option, policy or site minimise waste disposal?</p> <p>Will the option, policy or site promote the adoption of sustainable design and the use of locally and sustainably sourced, and recycled materials in construction and renovation?</p> <p>Will the option, policy or site reduce carbon emissions from energy?</p>	<p>Soil</p> <p>Climatic factors</p> <p>Material assets</p>
<b>Economic</b>		
15. Ensure a diverse and thriving economic base to support Arun's growth.	<p>Will the option, policy or site promote accessible employment opportunities?</p> <p>Will the option, policy or site attract inward investment and encourage business start-ups and SMEs?</p> <p>Will the option, policy or site strengthen the visitor economy in Arun?</p> <p>Will the option, policy or site reduce inequalities in income levels?</p> <p>Will the option, policy or site improve educational achievement and the skill base of the people of Arun?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p>

### SA Stage B: Developing and refining options and assessing effects

- 1.29 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. Planning Practice Guidance<sup>10</sup> states that the alternatives must be realistic and deliverable. It also needs to be recognised that the SEA and SA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select an option. Factors such as public opinion,

<sup>10</sup> Ministry of Housing, Communities and Local Government (2015) Planning Practice Guidance on Strategic Environmental Assessment and Sustainability Appraisal

deliverability and conformity with national policy will also be taken into account by plan-makers when selecting options for their plan.

- 1.30 The types of options (alternatives) considered during the preparation of the Local Plan including the further Main Modifications are listed below, and a discussion of how each type of option was identified and has been appraised is then provided.
- Strategic residential options.
  - Development scenarios and options.
  - Cross-boundary options.
  - Employment site options.
  - Policy options.

*Identification and appraisal of strategic residential sites*

- 1.31 The assessment of the strategic residential site allocations comprised five distinct components – a reassessment of the 12 sites included in the 2014 SA, an assessment of the 12 strategic sites initially proposed for consideration by ADC in July 2016, an assessment of two additional sites proposed by promoters in September 2016, an assessment of the ten strategic sites finally selected for consideration by ADC in November 2016, and a reassessment of Angmering North and an assessment of Angmering South and East in December 2017.
- 1.32 A reassessment of the 12 sites included in the 2014 SA was undertaken to ensure that a robust and consistent assessment of all residential site options has been undertaken. The SA confirmed that sites at Arundel, Rustington, Ferring West and Walberton were correctly discounted in 2014 and did not constitute reasonable alternatives.
- 1.33 At the time of LUC’s commission in June 2016, 13 strategic site allocations<sup>11</sup> were brought forward for further consideration for potential inclusion in the Main Modifications to the Local Plan. These 13 strategic sites correspond with the sites proposed in the Published Local Plan (October 2014). However, an initial study of these 13 sites identified that some of their boundaries included significant environmental constraints (e.g. the site boundary for the potential site at Pagham South included the Pagham Harbour SPA/Ramsar in addition to parts of the floodplain). LUC conveyed this information to the Council and in July 2016, the 13 strategic sites were subject to a sieving exercise by Council officers to identify any that were considered not to be reasonable and so would not proceed as strategic site options. Sites with valid planning consent or that were currently under construction were discounted from the assessment process on the basis that they already formed part of the deliverable supply. The site boundaries were revised following consultation on the Housing & Economic Land Availability Assessment (HELAA) (May/June 2016) and also to omit significant environment constraints. Due to completions in the northern and southern parts of the Angmering South and East site, the site boundary was revised which resulted in a reduction in site capacity of fewer than 300 units which the Council considers is not of a strategic size and therefore could not deliver strategic development. This site was therefore not assessed as a strategic site in the previous iterations of the SA.
- 1.34 In July 2016, the revised 12 strategic site options were subject to an initial assessment with the SA findings presented to Arun District Council to help inform decision making. These sites constitute reasonable alternatives to the preferred site options. The Council discounted two further sites namely North Middleton and Ferring East. Based on the initial findings of the Landscape Study, the Ferring East site was discounted as a preferred option as it was classified as being of substantial value/sensitivity and of low capacity due to the significant and detrimental effect on the character of the landscape and on the separation between settlements. The North Middleton site was discounted as a preferred option owing to the significant impacts on flooding, particularly as a result of climate change.
- 1.35 In September 2016, two additional sites, Bognor Regis Golf Club and Baird’s Family Land West of Littlehampton, were identified by promoters for inclusion in the Main Modifications to the Local Plan and have been considered as reasonable alternatives. The SA findings for these sites

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<sup>11</sup> Littlehampton; West Bersted; Barham/Eastergate/Westergate (BEW); Angmering North; Angmering South and East; Ford; Pagham North; Pagham South; Fontwell; Ferring East; Yapton; Climping; North Middleton.

identified multiple constraints to development, and as a result they were discounted as preferred site options.

- 1.36 From September to November 2016, an assessment of the remaining 10 reasonable strategic site options for inclusion in the Main Modifications to the Arun Local Plan was undertaken and updated regularly as the finalised versions of the technical supporting studies became available.
- 1.37 The strategic residential sites proposed in the further Main Modifications are the same as those contained in the Main Modifications to the Arun Local Plan (April 2017) with the following exceptions.
- 1.38 In December 2017, an assessment of the site at Angmering South and East was undertaken, as although it is no longer a strategic sized housing allocation, it is allocated in the plan to deliver 250 units and is retained in policy H SP2c. A re-appraisal of Angmering North was also undertaken at this time to exclude the strategic employment site. The Council took into account the findings of the SA as well as other relevant factors when deciding which site options should be included as preferred allocations in the further Main Modifications to the Arun Local Plan, and which options to reject. Detailed information about the reasons for selecting and rejecting site options is set out in **Appendix 12**.
- 1.39 **Table 7** provides a summary of the progression of sites since the beginning of the process in 2009.

**Table 7 Summary of the progression of residential and employment strategic sites**

Site	Progression through SA process
Arundel	Assessed in 2014 SA. Discounted as it is no longer a strategic site.
Angmering North	Assessed in 2014 SA, 2016 SA and reassessed in December 2017 following the exclusion of the strategic employment site. Selected as a preferred option.
Angmering South and East	Assessed in 2014 SA and initial 2016 SA. It is no longer a strategic sized housing site however it is allocated in the plan to deliver 250 units and was assessed in December 2017.
Angmering (employment)	Site not assessed in 2014 SA. Assessed in 2016 SA and reassessed in December 2017 following the revision of the site boundary. Selected as a preferred option.
Baird's Family Land West of LEGA	Highlighted as an option in September 2016. Assessed in 2016 SA but discounted due to multiple constraints.
Barnham/Eastergate/Westergate (BEW)	Assessed in 2014 SA and 2016 SA. Selected as a preferred option.
Enterprise Bognor Regis (employment)	Site not assessed in 2014 SA. Assessed in 2016 SA and selected as a preferred option.
Bognor Regis Golf Club	Highlighted as an option in September 2016. Assessed in 2016 SA but discounted due to flooding.
Climping	Assessed in 2014 SA and 2016 SA. Selected as a preferred option.
Courtwick, North Littlehampton	Assessed in 2009 Options for Growth. Not considered further as it progressed significantly through the planning process.
Ferring East	Assessed in 2014 SA and initial 2016 SA but not considered further as it would erode the settlement gap between Ferring and Goring.
Ford	Assessed in 2014 SA and 2016 SA. Selected as a preferred option.
Fontwell	Assessed in 2014 SA and 2016 SA. Selected as a preferred option.
Findon	Assessed in 2009 Options for Growth. Not considered further as it is within the South Downs National Park Authority jurisdiction.
Littlehampton	Assessed in 2014 SA and 2016 SA. Selected as a preferred option.
North Middleton	Assessed in 2014 SA and initial 2016 SA but not considered further due to multiple constraints.
North of Rustington	Assessed in 2014 SA but not considered further as part of the site has already progressed through the planning process and there are several

Site	Progression through SA process
	major constraints to developing the remainder of the site.
Pagham North	Assessed in 2014 SA and 2016 SA. Selected as a preferred option.
Pagham South	Assessed in 2014 SA and 2016 SA. Selected as a preferred option.
Toddington Nurseries, North Littlehampton	Assessed in 2009 Options for Growth. Not considered further as it progressed significantly through the planning process.
Walberton	Assessed in 2014 SA but not considered further due to landscape constraints.
West Bersted	Assessed in 2014 SA and 2016 SA. Selected as a preferred option.
West Felpham	Assessed in 2009 Options for Growth but not considered further as it is not a strategic site.
Yapton	Assessed in 2014 SA and 2016 SA. Selected as a preferred option.

**Caveat:**

The strategic sites were assessed in a policy vacuum. Sites were assessed based on the principle of developing the site but without the Local Plan policy framework and therefore potential mitigation measures taken into account.

The policies of the Local Plan were assessed separately to the sites. The assessment of the policies however, has taken into account the findings of the SA of strategic sites where relevant (i.e. for those policies which include site allocations).

*Growth scenarios and distribution options*

- 1.40 The process of appraising the site options against growth and distribution scenarios has evolved since the beginning of the SA process of the further Main Modifications as more robust and reliable information has emerged.
- 1.41 In order to identify the number of new homes to plan for over the next 20 years, four scenarios were originally identified by the Council and reported to the Local Plan sub-committee on 1<sup>st</sup> March 2016 to test options for the provision of housing:
- Scenario One – 650dpa (equating to 13,000 homes over the plan period) to allow a full assessment of the medium level contained in previous evidence;
  - Scenario Two: 758dpa (equating to 15,160 homes over the plan period) which was the OAN figure that was identified in the Objectively Assessed for Housing (Arun District Council, March 2015);
  - Scenario Three: 845dpa (equating to 16,900 homes over the plan period) being the amount included in the Planning Inspector’s conclusions in February 2016; and,
  - Scenario Four: 1,000dpa (equating to 20,000 homes over the plan period) being a theoretical figure the Council set to test whether it is sustainable to achieve a higher level of housing growth which would provide for a genuine opportunity to consider unmet need within the housing market area.
- 1.42 Arun District Council developed five distribution scenarios under the four housing growth scenarios (650dpa, 758dpa, 845dpa, and 1,000dpa) which encompassed a variety of locations across the District:
- Scenario One – Reflecting the submitted strategy;
  - Scenario Two – Reflecting the submitted strategy with the addition of village extensions;
  - Scenario Three Option One – Focusing on large strategic sites;
  - Scenario Three Option Two – Dispersed strategy with smaller sites but smaller scale extensions to most settlements;
  - Scenario Four – Every site (except North Middleton).

- 1.43 **Table 8** defines the level of residential development that could be accommodated on each potential new development allocation under each Scenario/Option combination proposed in June 2016. The capacity figures for each site were either provided by promoters at that time, through the HELAA process, or identified in Visioning Briefs and Masterplans.

**Table 8 June 2016 - Residential Quanta for Scenario & Option Site Combinations**

Site Option	Scenario				
	1	2	3.1	3.2	4
Angmering North	-	700	-	700	700
Angmering South and East	650	650	650	650	650
Barnham / Eastergate / Westergate (BEW)	2,000	2,000	3,000	2,000	3,000
Climping	-	500	-	500	500
Ferring East	336	336	-	336	336
Fontwell	400	400	400	400	400
Ford	900	900	2,000	900	2,000
Littlehampton	1,000	1,000	1,000	-	1,000
North Middleton	-	-	-	500	-
Pagham North	-	300	-	300	300
Pagham South	-	-	-	600	600
West of Bersted	-	-	2,500	1,000	2,500
Yapton	-	500	-	500	500
<b>TOTAL</b>	<b>5,286</b>	<b>7,286</b>	<b>9,550</b>	<b>8,386</b>	<b>12,486</b>

- 1.44 Following the revision of strategic site options and site boundaries in July 2016, there were changes to scenario capacities for several sites. A detailed description of the reasons for the revision of the site boundaries is provided in **Appendix 12** of the SA Report. The capacity changes are detailed below:

- Pagham South – from 600 to 300 (low capacity) and 400 (high capacity).
- Pagham North – from 300 to 600 (low capacity) and 800 (high capacity).
- Yapton – from 500 to 300 (low capacity) and 400 (high capacity).
- Littlehampton – from 1,000 to 1,000 (low capacity) and 1,100 (high capacity).
- Angmering North – from 700 to 500 (low capacity) and 800 (high capacity).
- Ferring East – from 336 to 350 (both capacities).
- Climping – from 500 to 300 (low capacity) and 500 (high capacity).

- 1.45 **Table 9** summarises the capacity figures used to appraise the strategic residential sites. As discussed above, the sites of North Middleton and Ferring East were discounted by the Council following the initial SA in July 2016.

**Table 9 Capacity figures for the initial and final assessments**

Strategic Site	Site Capacity	
	High	Low
Angmering North	800	500
Barnham/Eastergate/Westergate (BEW)	3,000	2,000
Climping	500	300

Strategic Site	Site Capacity	
<i>Ferring East (initial assessment only)</i>	350	350
Fontwell	400	400
Ford	2,000	900
Littlehampton	1,100	1,000
<i>North Middleton (initial assessment only)</i>	500	500
Pagham North	800	600
Pagham South	400	300
West of Bersted	2,500	1,000
Yapton	400	300

1.46 In September 2016, the Council published an [Updated Housing Needs Evidence Report](#), prepared by GL Hearn, which identified a revised OAN of 919dpa based on 2014-based population and household projections (the 845dpa identified by the Inspector was based on 2012-based population and household projections) resulting in an increase in the assessed housing need to 18,380 homes for the plan period. In light of the revised OAN, it was no longer necessary to test a range of potential 'quantum' options as the original four growth scenarios (650dpa, 758dpa, 845dpa, 1,000dpa) were superseded by a revised and more accurate growth scenario of 919dpa. This further uplift in OAN also meant that all 10 preferred sites at their maximum capacities would be required to meet the higher OAN, with the exception of the following four sites whose capacity figures were revised as further information became available on the level of housing the sites would be able to accommodate:

- Barnham/Eastergate/Westergate (BEW) – from 3,000 (high capacity) to 2,300.
- Ford – from 2,000 (high capacity) to 1,500.
- West Bank Littlehampton – from 1,100 (high capacity) to 1,000.
- Climping – from 500 units to 300 units.

1.47 As discussed above, the SA of the 10 strategic residential sites for the Main Modifications to the Arun Local Plan and the further Main Modifications to the Arun Local Plan used the capacity scenarios as outlined in **Table 9**. The revised capacity figures for Climping (300 units) and West Bank Littlehampton (1,000 units) were already assessed under these capacity scenarios. The revised capacity figures for BEW (2,300 units) and Ford (1,500 units) were not appraised as they are closely aligned with the capacities assessed (BEW [2,000 low capacity] and Ford [2,000 high capacity]) and therefore, the assessment scores would be unaffected.

1.48 **Table 10** summarises the final housing trajectory figures (January 2017) which will be required to meet the revised OAN.

**Table 10 Final housing trajectory figures**

Site Reference	Strategic Site	Site Capacity
<b>Greater Bognor Regis Urban Area</b>		
SD1	Pagham South	400
SD2	Pagham North	800
SD3	West of Bersted	2,500
<b>Greater Littlehampton Urban Area</b>		
SD4	Littlehampton - West Bank	1,000

Site Reference	Strategic Site	Site Capacity
<b>Inland Arun</b>		
SD5	Barnham/ Eastergate/ Westergate (BEW)	2,300
SD6	Fontwell	400
SD7	Yapton	400
SD8	Ford	1,500
SD9	Angmering North	800
SD10	Climping	300
SD11	Angmering South and East	250 <sup>12</sup>
<b>Total</b>		<b>10,650</b>

1.49 As highlighted above, 919 dwellings per annum equates to 18,380 for the 20 year plan period. For the remaining 15 years of the plan and taking into account the 3,047 completions from 2011-2016, a further 15,333 homes are required in order to meet the revised OAN. It is anticipated that this figure will be met by allocating strategic sites which will deliver 10,650 homes, 5,127 homes from existing commitments/'Made' Neighbourhood Plan allocations/deliverable HELAA sites, etc., and at least 1,250 homes from small sites in the DPDs/Neighbourhood Plans, resulting in a surplus of 1,694 homes which can contribute to neighbouring authorities' unmet housing need.

1.50 Further information is presented in **Chapter 4** of the SA Report.

#### *Cross boundary options*

1.51 A critical aspect of this work will be whether unmet housing needs arising from elsewhere in the Chichester & Bognor Regis Housing Market Area (HMA) and the Coastal Urban Area HMA can be met in Arun District. Arun District Council undertook detailed discussions with neighbouring planning authorities in October 2016 under the Duty to Cooperate.

1.52 High level assumptions have been made about the connectivity of the strategic sites to neighbouring local authorities. These assumptions are based on proximity to the destination local authority, proximity to 'A' roads or railway stations. Further information on which strategic locations are considered most likely to serve the different neighbouring authorities' unmet need is presented in **Chapter 4** of the SA Report.

#### *Identification and appraisal of employment site options*

1.53 Two strategic employment sites at Angmering and Enterprise Bognor Regis were also subject to SA<sup>13</sup>. The Enterprise Bognor Regis site comprises of four component areas between Bersted, Bognor Regis and Felpham: (1) Salt Box, (2) Rowan Park, (3) Oldland's Farm and, (4) LEC Airfield with adjoining land. The site at Angmering is located west of A280 and north of Water Lane.

1.54 There is also 3.5ha of employment land within LEGA at Courtwick (1.5ha) and North Littlehampton (2ha), however, as planning permission has been secured for these sites they were not subject to assessment however, the cumulative effects of these sites with the policies and site allocations of the further Main Modifications to the Arun Local Plan is considered in Chapter 7.

1.55 Following the 2017 Examination, the boundary of the site at Angmering was revised and the site size reduced from 8.3ha to 3.0ha. A reassessment of the site was undertaken in December 2017.

1.56 The SA findings are summarised in **Chapter 5** of the SA Report and the detailed SA matrices can be found in **Appendix 9**.

<sup>12</sup> The calculations in the Housing Trajectory and Supply spreadsheet include the 250 homes proposed at Angmering South and East. Although it is no longer a strategic site, it has been included in the calculation of strategic sites as it will have a specific policy relating to its development.

<sup>13</sup> There is also 3.5ha of employment land proposed in the Littlehampton Economic Growth Area, however, as this is primarily a housing development site, it will not be subject to a separate assessment.

### Identification and appraisal of policy options

- 1.57 The policies included in the submitted Local Plan were subject to SA by Arun District Council at that time, with the findings described in the 2014 SA Report.
- 1.58 The policies included in the Main Modifications to the Arun Local Plan (April 2017) were subject to SA. For completeness and consistency, the policies which were not subject to proposed Main Modifications were also appraised using the revised SA Framework.
- 1.59 In light of the comments received during the Examination process, a number of policies have been affected and were revised by Arun District Council as part of the preparation of the further Main Modifications to the Arun Local Plan. These policies were subject to SA in December 2017.
- 1.60 Since all of the modified and unmodified policies have been appraised and as the plan has progressed significantly through the Local Plan process, it was determined that there were no other reasonable alternative policies which could be assessed.
- 1.61 The SA findings are summarised in **Chapter 6** of the SA Report and the detailed SA matrices can be found in **Appendix 10**.

### SA Stage C: Preparing the Sustainability Appraisal report

- 1.62 The full SA report describes the process that has been undertaken to date in carrying out the SA of the further Main Modifications to the Arun Local Plan. It sets out the findings of the appraisal of reasonable alternatives, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the plan as it is drafted in full. It also describes the reasons for selecting or rejecting certain options during the preparation of the Local Plan. All of this information is summarised in this Non-Technical Summary.

### SA Stage D: Consultation on the Arun Local Plan and SA Report

- 1.63 Arun District Council is inviting comments on the further Main Modifications to the Arun Local Plan 2011-2031 and the full SA Report which this Non-Technical Summary relates to. These documents will be published on the Council's website for consultation from January/February 2018 for a six week period.

### SA Stage E: Monitoring implementation of the Local Plan

- 1.64 Recommendations for monitoring the social, environmental and economic effects of implementing the further Main Modifications of the Local Plan are presented in **Chapter 9** of the SA report and are summarised further ahead in this document.

## Appraisal methodology

- 1.65 The reasonable policy and site options for the further Main Modifications to the Arun Local Plan have been appraised against the SA objectives in the SA framework (see **Table 6** earlier in this section), with scores being attributed to each option or policy to indicate its likely sustainability effects on each objective as follows:

**Figure 1 Key to symbols and colour coding used in the SA of the Arun Local Plan**

++	The option or policy is likely to have a <b>significant positive</b> effect on the SA objective(s).
++/-	The option or policy is likely to have a mixture of <b>significant positive</b> and <b>minor negative</b> effects on the SA objective(s).
+	The option or policy is likely to have a <b>minor positive</b> effect on the SA objective(s).
0	The option or policy is likely to have a <b>negligible</b> or no effect on the SA objective(s).

-	The option or policy is likely to have a <b>minor negative</b> effect on the SA objective(s).
--/+	The option or policy is likely to have a mixture of <b>significant negative</b> and <b>minor positive</b> effects on the SA objective(s).
--	The option or policy is likely to have a <b>significant negative</b> effect on the SA objective(s).
?	It is <b>uncertain</b> what effect the option or policy will have on the SA objective(s), due to a lack of data.
+/- or ++/--	The option or policy is likely to have an equal mixture of <b>both minor or both significant positive and negative</b> effects on the SA objective(s).

- 1.66 Where a potential positive or negative effect is uncertain, a question mark is added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 1.67 The likely effects of the options need to be determined and their significance assessed, and this inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or emerging option on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.
- 1.68 Sites were assessed based on the principle of developing the site but without the Local Plan policy framework and therefore potential mitigation measures taken into account. This approach is taken to ensure the scoring process adequately reflects the individual components of the plan, within the context of the developing policy framework where changes continue to be made to policies during the assessment process. At the end of the SA process, the recommendations and conclusions draw together the assessment findings within the context of the Local Plan policy framework.
- 1.69 The policies of the Local Plan were assessed separately to the sites. However, the assessment of the policies which relate to site allocations has taken into account the findings of the SA of strategic sites where relevant.

### Assumptions applied during the SA

- 1.70 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency and transparency in the appraisal of the strategic residential sites, detailed assumptions to help differentiate between minor and significant effects were developed and applied, as presented in **Appendix 3** of the full SA Report. The assumptions used for the reappraisal of the 2014 site options relied primarily on the use of Geographical Information Systems (GIS) data, while the assumptions used for the subsequent assessment of site options also incorporated information derived from the supporting technical studies prepared to inform the further Main Modifications to the Arun Local Plan. The assumptions used to appraise the strategic employment sites are presented in **Appendix 8** of the full SA Report.

### Difficulties encountered

- 1.71 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process and these are outlined below.
- 1.72 The lack of detail as to the likely layout within sites is reflected in the relatively high level nature of the SA and also necessitated use of assumptions relating to each SA objective, as described above.
- 1.73 The preparation of the supporting technical studies in parallel with the Sustainability Appraisal, the amendments to site boundaries in June 2016, and the addition of new sites resulted in several revisions and iterations of this report and site assessments. It was deemed appropriate to conduct

an initial assessment of the sites in July 2016 using the information present at the time. The subsequent assessments incorporated the findings of the finalised versions of the technical studies.

## Policy Context

### Review of Plans, Programmes and Environmental Protection Objectives

- 1.74 The Arun Local Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and regional levels.
- 1.75 During the Scoping stage of the SA, a review was undertaken of the other plans, policies and programmes that are relevant to the Local Plan. This review has been revised and updated since it was originally presented in the SA Scoping Report in 2009, in light of comments received during the Scoping Statement consultation and the 2014 SA consultation, and to make the review more concise, ensuring that it reviews an appropriate range of up-to-date plans, policies and programmes in an appropriate level of detail. The updated review can be seen in full in **Appendix 1** of the SA Report and the key findings are summarised below.
- 1.76 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Arun Local Plan. These processes should both be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 1.77 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however the international directives have been included in **Appendix 1** of the full SA Report for completeness.
- 1.78 The most significant development in terms of the policy context for the Arun Local Plan has been the publication of the National Planning Policy Framework (NPPF) which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that:
- "Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."*
- 1.79 The NPPF also requires Local Plans to be 'aspirational but realistic'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 1.80 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
  - the provision of retail, leisure and other commercial development;
  - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.81 In addition, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

1.82 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Arun which provide further context for the emerging Local Plan. These plans and programmes relate to issues such as housing, transport, renewable energy and green infrastructure, and have also been reviewed in **Appendix 1** of the full SA Report.

### Baseline Information

1.83 In line with the requirements of the SEA Regulations, consideration has been given to the current state of the environment in Arun District. Detailed baseline information for the District is presented in **Chapter 3** of the full SA Report. As well as environmental issues, the baseline information includes a description of social and economic issues in the District.

1.84 Arun District is one of seven districts within West Sussex and is bordered by Chichester District to the west, and Worthing Borough and Adur District to the east. The northern part of Arun District is within the planning jurisdiction of the South Downs National Park Authority. The District covers an area of 12,090 hectares (46 square miles) and has an estimated resident population of 149,518 people<sup>14</sup>. The majority of Arun District occupies the coastal plain between Pagham Harbour in the west and Goring to the east. The District's settlement hierarchy is dominated by the coastal towns of Bognor Regis and Littlehampton. Bognor Regis and Littlehampton have merged with their neighbouring settlements to form larger built-up areas. In the west of the District, the Bognor Regis urban area includes the villages of Pagham, Aldwick, Bersted, Felpham and Middleton-on-Sea. East of the River Arun, Littlehampton, Rustington, East Preston and Kingston form a second built-up area. The settlement pattern inland comprises a series of villages and hamlets.

1.85 The population projections for Arun predict that the population will increase to 157,000 in 2016 and to 191,000 by 2039<sup>15</sup>. Migration is the key driver of population change in Arun District, and in particular internal migration (i.e. moves from one part of the Country to another). The data also shows a negative natural change (i.e. there are more deaths than births) which is consistent with

<sup>14</sup> 2011 Census population figure for Arun District.

<sup>15</sup> ONS, 2015. *Subnational Population Projections for Local Authorities in England*. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections> [Accessed 22 June 2016]

an older age structure in the population. In 2011, the mean age of Arun's population was 45.5 years which is older than the national average of 39.3 years<sup>16</sup>. The median age of residents in the District was 47 in 2011 compared with the national median age of 39<sup>17</sup>.

- 1.86 Arun's population is mainly concentrated in two urban centres: Littlehampton which has a population of 27,795 representing 18.6% of the total population of Arun; and Bognor Regis, which has a population of 24,064 representing 16.1% of the total population of Arun<sup>18</sup>. The remaining population of 97,659 live in rural villages of varying sizes and make up 65.3% of the total population of Arun (the villages with the highest population are Rustington East and West [13,297 people] and Aldwick East and West [9,685]).
- 1.87 The Overall Index of Multiple Deprivation (IMD) indicates that Arun District generally has a relatively low level of deprivation, however there are concentrations of deprivation in the wards of River and Ham in Littlehampton, and Bersted which fall in the top 10% most deprived nationally. Analysis of the 20% most deprived areas in the District identify an additional five neighbourhoods which are principally located around Bognor Regis in the wards of Marine, Pevensy, and Hotham, and in the River ward of Littlehampton. Arun is generally performing well under the Health Deprivation and Disability domain of the English Indices of Deprivation 2015, however, there are ten wards ranked within the 20% most deprived, three of which are within the 10% most deprived nationally - Ham and River in Littlehampton, and Bersted. According to the English Indices of Deprivation 2015, Arun is performing relatively poorly in the Education, Skills and Training domain with 50 out of 94 neighbourhoods within the 40% most deprived of educational attainment, 11 of which are within the 10% most deprived in the country. The most affected areas are concentrated in the wards of Littlehampton (Ham), Bognor Regis (Pevensy, Hotham, Marine, and Orchard), Bersted, and Rustington East.
- 1.88 There are 87,200 people (55.5% of the population) of working age in Arun District which is below both the south-east and national averages of 62.0% and 63.1% respectively. The latest labour market statistics<sup>19</sup> show that between July 2016 – June 2017, 76.7% of Arun's residents aged 16-74 were economically active which is below both the regional average of 81.0% and the national average of 78.0%. Of this, 3.6% were unemployed which is above both the regional (3.5%) and national average (4.6%). The District's largest employment industries are: wholesale and retail trade/repair of motor vehicles and motorcycles (20%), human health and social work activities (15.6%), accommodation and food service activities (11.1%), and administrative and support service activities (10%).
- 1.89 Bognor Regis represents the largest retail centre of the district. The mix of retail uses is orientated towards comparison (non-food) and service uses although the absence of modern floorspace, including an anchor store and higher quality fashion/clothing retailers remains an underlying weakness of the retail offer<sup>20</sup>. An equally important weakness is the limited range and choice of leisure and entertainment facilities. Although Littlehampton is the second largest centre in the district, it is significantly smaller than Bognor Regis but serves an important role for the east of the district.
- 1.90 Transport links are dominated by east-west routes, particularly the A27 and A259, linking Arun with Worthing and Brighton to the east, and Chichester and Portsmouth to the west. Arun District has significantly stronger outflows of commuters (approximately 27,394) compared to inflows (approximately 8,973). Of the seven local authorities within West Sussex, Arun has the highest number of people commuting out of the District to work. Chichester District is the most popular destination area for Arun District out-commuters (approximately 10,651) while Worthing is the most popular destination for in-commuters (approximately 3,179).

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<sup>16</sup> ONS, 2011. *2011 Census: Age Structure, 2011(QS104EW)* [online]. Available at: <http://neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=6275005&c=arun&d=13&e=62&g=6473105&i=1x1003x1032x1004&m=0&r=1&s=1467373771748&enc=1&dsFamilyId=2474> [Accessed 22 June 2016]

<sup>17</sup> Ibid.

<sup>18</sup> Arun District Council, 2016. *Ward Profiles* [pdf]. Available at: <http://www.arun.gov.uk/ward-profiles#new> [Accessed 22 June 2016]

<sup>19</sup> Nomis, 2017. *Labour Market Profile – Arun* [online]. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157340/report.aspx?town=arun#tabquals> [Accessed 12 December 2017].

<sup>20</sup> Arun District Council, 2013. *Arun District Retail Study 2013* [pdf]. Available at: <http://www.arun.gov.uk/download.cfm?doc=docm93jjjm4n4676.pdf&ver=4366> [Accessed 8 July 2016].

- 1.91 Arun District contains many areas of high ecological value including sites of international and national importance which provide important habitats for wildlife. The District contains one site of international importance, Pagham Harbour, which has been designated as a Special Protection Area (SPA), a Ramsar site, and a Marine Conservation Zone (MCZ). The Arun Valley SAC/SPA/Ramsar site is located just north of the South Downs escarpment (within Horsham District). Although the Arun Valley SAC/SPA/Ramsar site is not within Arun District’s jurisdiction, Natural England identified Functionally Connected Land (FCL) (i.e. land surrounding Arun Valley SAC/SPA/Ramsar which has a function in supporting the ecological integrity of the site) which is located within the District.
- 1.92 Arun District is within the Arun and Western Streams Catchment which covers an area of approximately 14,000 square kilometres. The majority of areas within Flood Zones 2 and 3 are present along the banks of the River Arun and its tributary the Black Ditch, and the West Sussex Rifes. The main source of fluvial flooding is associated with these watercourses. Most of the flood zones cover rural areas although areas of Littlehampton and Arundel are included in flood zones 2 and 3, where a significant number of properties and businesses are at risk of flooding<sup>21</sup>. There are a number of Source Protection Zones within the District to ensure that rivers and aquifers are protected from pollution and are principally located within the South Downs National Park. According to the Arun Strategic Surface Water Management Study (2016) and the Infrastructure Delivery Plan (2016), Southern Water has indicated that there is little spare capacity in the foul water network and pumping mains to the Waste Water Treatment Works (WWTW) at Ford, Pagham and Lidsey.
- 1.93 Arun District has a large resource of high quality agricultural land (grade 1 and 2) surrounding Westergate, Barnham, Yapton, Ford and Angmering. Land along the coastline is categorised as grade 7 (urban) whilst large swathes of land within the National Park are categorised as grade 6 (non-agricultural).
- 1.94 There are many heritage designations within Arun District (including within the South Downs National Park). There are 977 Listed Buildings (24 Grade I, 925 Grade II, and 28 Grade II\*), 36 Conservation Areas, and 42 Scheduled Monuments. Excluding the designations within the National Park, there are 737 Listed Buildings, 29 Conservation Areas, and eight Scheduled Monuments within the District.
- 1.95 Arun District stretches east and west of the valley and estuary of the River Arun across the West Sussex coastal plain and undulating dip slope hills of the South Downs National Park. There are no Areas of Outstanding Natural Beauty, Country Parks, or Green Belt in the District.

### Key Sustainability Issues and their Likely Evolution without the Local Plan

- 1.96 The baseline information contributed to the identification of a set of key sustainability issues for Arun District, which in turn helped to develop a locally appropriate SA Framework. **Table 11** below sets out the key sustainability issues for the District and, in line with the requirements of the SEA Regulations, consideration is also given to the likely evolution of the environment in the District if the new Local Plan were not to be adopted.

**Table 11 Key sustainability issues for the Arun Local Plan and likely evolution without the Plan**

Key sustainability issue	Likely evolution of the issue without implementation of the Local Plan
<b>Population</b>	
Migration, and in particular internal migration, is the key driver of population change in Arun.	The migration profile reflects a relatively weak economic performance in the District. The Local Plan can facilitate the provision of local jobs and encourage more working households to move to or stay in the area. In the absence of the new Local Plan, ongoing high levels of migration will continue to increase.
The age structure of the population currently shows a higher than average level of	The average age of the population at the end of the plan period will be an ageing population, if the new Local Plan does not encourage younger people to remain in the District, or encourage young families to migrate into the

<sup>21</sup> Arun District Council, 2016. *Strategic Flood Risk Assessment Technical Report* [pdf]. Available at: <http://www.arun.gov.uk/download.cfm?doc=docm93jjim4n9414.pdf&ver=9270> [Accessed 22 September 2016].

Key sustainability issue	Likely evolution of the issue without implementation of the Local Plan
retired people and a lower than average level of people under the age of 45.	District. The NPPF requires that local authorities plan for housing for a variety of different types of people including older people and those with young families. This is to be achieved through the Local Plan and the provision of facilities such as appropriate housing which will not only cater for older people but also families with younger children will help to encourage the development of a more balanced population in Arun in terms of age. Without the implementation of the new Local Plan this issue would therefore be less well addressed.
<b>Housing</b>	
There is a need for housing that meets the needs of the local population.	Development of housing would happen but it would be less controlled, and would not deliver the desired outcome to meet the needs of the local community. The NPPF requires that an appropriate evidence base should be drawn upon to identify the local need for housing and where this housing should be located. This will be achieved through the Local Plan which seeks an appropriate mix of housing and is informed by the Housing and Economic Land Assessment. Without the implementation of the new Local Plan this issue would therefore be less well addressed.
<b>Social inclusion and deprivation</b>	
While the overall level of deprivation is low in the District, there are pockets of high deprivation in communities such as Littlehampton and Bersted.	The new Local Plan can help to tackle some of the causes of crime, by reducing the gaps in local community service provision which may help to ensure that there is adequate provision of services to address anti-social behaviour and health issues. The planning system can have a significant impact on the quality of life of experienced by communities, particularly in relation to culture, recreation and crime. Paragraph 69 of the NPPF states that planning policies and decisions should aim to promote " <i>safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion</i> ". Without the implementation of the new Local Plan this issue would therefore be less well addressed.
<b>Health</b>	
Health inequalities exist between the most and least deprived communities in the District.	<p>The planning system has relatively limited influence on public health and the Local Plan is therefore likely to have relatively little effect. However, the NPPF states that, "<i>local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and wellbeing</i>" (paragraph 171).</p> <p>Although the NPPF seeks to improve health and wellbeing, Local Plan policies relating to health and wellbeing in Arun can help to reduce the gaps in provision of facilities for healthcare facilities and infrastructure for sport and recreation and the walking and cycling network. This would help to ensure that there are adequate facilities to encourage individuals to have a more active and healthier lifestyle. Without the implementation of the new Local Plan this issue would therefore be less well addressed.</p>
<b>Education, skills and training</b>	
Educational attainment in the area is low.	There are no policies in the Arun Local Plan 2003 that relate directly to the low educational attainment in the area. Levels of GCSE attainment are significantly worse than the England average; therefore without the implementation of the new Local Plan this issue would therefore be less well addressed.
<b>Culture, leisure and recreation</b>	
Leisure facilities in the District are poor and in need of investment. Closure of existing facilities could result in a substantial decline in physical activity in the District.	<p>The NPPF requires that Local Plans and planning decisions should promote high quality public space and policy should protect existing open space. As such this issue is addressed to some extent but the new Local Plan offers opportunities for up to date and locally specific policies.</p> <p>The NPPF does require that a sequential test be applied in the absence of an up-to-date Local Plan. This should help to mitigate the loss of town centre uses, however specific policies which protect these should allow for planned and more sustainable growth of Littlehampton and Bognor Regis town centres. Without the implementation of the new Local Plan this issue would therefore be less well addressed.</p>

Key sustainability issue	Likely evolution of the issue without implementation of the Local Plan
<b>Economy</b>	
There is a need to attract higher knowledge based industries to the District.	At present Arun shows a lower level of employment focussed in the higher knowledge service sector of the economy than the national average. Although the Arun Local Plan 2003 does not place an emphasis on the higher knowledge sector over other business uses, provision has been made for a significant amount of floorspace to be designated for business, industry and warehousing (Policy GEN6, Amount of New Commercial Development); however the Plan is out of date. Without the implementation of the new Local Plan this issue would therefore be less well addressed.
There is a need to stimulate the local economy, increasing economic growth and average earnings while addressing skills shortages within the District.	The Arun Local Plan 2003 supports development for new education facilities; however this approach did not result in a noticeable improvement in local skill levels or employment opportunities and as such a continued skill shortage is likely if a new relevant policy is not adopted.
There is a need to ensure the continuing regeneration of Littlehampton and Bognor Regis.	The NPPF does require that a sequential test be applied in the absence of an up-to-date Local Plan. This should help to mitigate the loss of town centre uses, however specific policies which protect these uses should allow for planned and more sustainable growth of Littlehampton and Bognor Regis town centres. Without the implementation of the new Local Plan this issue would therefore be less well addressed.
<b>Retail and tourism</b>	
The main shopping centres of Arun are struggling to compete with neighbouring centres, particularly in terms of leisure and entertainment, with considerable levels of expenditure outflow to Chichester and Worthing.	The importance of retail and tourism for the local economy will continue. The Arun Local Plan 2003 provides support for development which involves commercial allocation, the extension, intensification or refurbishment of established tourist attractions with consideration of the local character and allows for retail development outside the principal shopping areas. As such the maintenance of an important local tourist sector is addressed through the current plan but a new Local Plan provides an opportunity for up to date policies to address this issue more effectively.
<b>Transport</b>	
Significant out-commuting of workers particularly to Chichester District. Accessibility and sustainable transport links need to be improved within the rural areas of the District.	In the absence of the new Local Plan, ongoing high levels of out-commuting will continue and will lead to increased congestion on the strategic and local road networks in the District.  The Local Plan provides an opportunity to help to maintain and improve existing public transport, cycle and pedestrian networks, particularly in rural areas; locate future development in locations which take maximum advantage of these networks and ensure that future developments are planned and designed in a manner which supports use of these modes.
<b>Biodiversity</b>	
Arun District contains many areas of high ecological value including sites of international and national importance. These are under threat from urban pressures, including disturbance and damage from recreational use.	The NPPF (paragraph 7) states that the planning system has a key environmental role including, <i>"contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity..."</i>  Therefore, even without the new Local Plan this issue is being addressed to some extent by national planning policy as well as legislative protection outside of the planning system. However, given the current pressures for growth and development within the district, an up-to-date Local Plan can help to conserve and enhance biodiversity by directing development away from sensitive locations and managing new development so that its design minimises effects on the natural environment.
<b>Water</b>	
Arun District is affected to varying degrees by all sources of flooding, although the major sources are fluvial, tidal and groundwater. Significant numbers of properties and businesses are at risk of flooding within the district.	The NPPF supports development which is not within areas of high flood risk and does not increase flood risk elsewhere. A sequential and exception test is to be applied when approaching the location of development through the Local Plan in relation to areas of flood risk. Development would be less controlled in relation to flood risk therefore, if the Local Plan was not adopted and given that there are areas of high flood risk in the District, this could potentially lead to development being located within these areas, increasing flood risk in other areas.
There is little spare capacity in	Continued development means that there is a risk of further flooding and

Key sustainability issue	Likely evolution of the issue without implementation of the Local Plan
the foul water network and pumping mains to the WWTWs at Ford, Paghams and Lidsey.	potential contamination of watercourses. The Local Plan provides an opportunity to have a specific policy in relation to the Lidsey Wastewater Treatment Works Catchment Area which can directly link to the Arun Strategic Surface Water Management Plan (SSWMP) to ensure robust delivery of the actions identified within the SSWMP.
<b>Soil</b>	
Housing completions on previously developed land (brownfield) is decreasing resulting in development on greenfield sites and increased pressure on Arun's best and most versatile agricultural land.	The NPPF encourages the protection of high quality agricultural land and the reuse of previously developed land which may help to ensure some reuse of local brownfield sites. However, it is expected that allocating sites which are brownfield where possible through the Local Plan would result in the increased use of these sites.
<b>Historic Environment</b>	
There are areas of historic importance in Arun that should be preserved and enhanced. These are continuously facing pressures for change.	Continued development pressure means that the risk of harm to heritage assets would be likely to continue and may be exacerbated without a planned local approach to development. International and national protection is afforded by various strategies and policies as well as the NPPF. Paragraph 17 of NPPF states that the planning system should " <i>conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations</i> ".  Whilst these policies make provision for the protection of the historic environment in the absence of a Local Plan, implementation of locally specific policies through the new Local Plan provides the opportunity to steer development away from sensitive assets. The Local Plan also affords opportunities for enhancement, for example bringing unused old buildings into appropriate new uses or improving the condition and addressing detracting elements of conservation areas.
The landscape of the District is not subject to statutory landscape designations however, the introduction of urbanising elements particularly within close proximity of the South Downs National Park border may impact on the National Park's special qualities.	The adopted Local Plan already includes a policy seeking to protect and enhance the landscape from development which would have an unacceptable adverse impact on the landscape. The Local Plan offers the opportunity to build on this policy and to select site allocations following consideration of their impacts on the landscape through SA.
<b>Climate Change</b>	
As a coastal district, Arun is likely to experience more extreme impacts as a result of climate change – wetter winters with greater incidences of flooding, warmer, drier summers and shifting sea levels.	The severity and likelihood of extreme weather events is likely to increase with climate change. The NPPF requires that local authorities have a proactive strategy to mitigating and adapting to climate change and take into account Shoreline Management Plans and Coastal Change Management Areas. The SMP sets out policies for the various sections of coastline within Arun, however these policies are not statutory and are intended to inform the planning process. Therefore, without the new Local Plan, development is likely to be less well planned and could potentially be located in vulnerable areas or in areas adding to the impacts of physical changes to the coast.

## Sustainability Appraisal Findings for the Strategic Residential Site Allocations

- 1.97 The SA findings for the strategic residential sites that have been considered for the further Main Modifications to the Arun Local Plan are described in detail in **Chapter 4** of the SA Report. The assumptions used to appraise the residential sites are presented in **Appendix 3** while the detailed SA matrices for the sites are presented in **Appendices 4-7** of the SA Report.
- 1.98 The scores for the preferred strategic residential sites are illustrated in **Table 12** overleaf, and it should be noted that these scores are prior to mitigation (i.e. the requirements set out in the site

specific policies have not been taken into account). A total of 10 preferred strategic residential sites were subject to SA from September to November 2016. As the site at Angmering South and East is retained in policy H SP2c, the Council requested an assessment of this site in December 2017. A re-appraisal of Angmering North was also undertaken at this time to exclude the strategic employment site however this did not affect the SA scores.

- 1.99 Significant positive effects are recorded in relation to SA objectives 2: Health and Wellbeing, 3: Housing, 4: Social Infrastructure, 6: Transport, and 15: Economy. Significant negative effects are identified in relation to SA objectives 2: Health and Wellbeing, 7: Biodiversity, 8: Water Quality, 9: Flood Risk, 10: Air Quality, 11: Soil, 12: Historic Environment, 13: Landscape and 15: Economy.
- 1.100 The strategic site at Fontwell scores the least significant negative effects followed by Yapton, Pagham North, Pagham South, and Ford. Angmering North, BEW, Climping, West of Bersted, and Littlehampton - West Bank, as well as Angmering South and East score the most significant negative effects in relation to the SA objectives. Although the strategic sites at BEW and Littlehampton - West Bank are amongst the sites which score the most significant negative effects, they also score the most significant positive effects (in addition to West of Bersted) reflecting the social and economic benefits associated with developing larger residential sites. However, it will be more challenging to mitigate the effects of development on the environment if these large sites are taken forward. Sites with the least significant positive effects are generally associated with the smaller scale strategic sites including Yapton, Pagham South, Pagham North, Fontwell, Climping and Angmering North.
- 1.101 The SA report also considered whether it would be possible to meet unmet housing needs in neighbouring authorities, based on the strategic growth locations delivering housing in excess of the Objectively Assessed Need (OAN) for Arun District. It identified that there will be a surplus of 1,694 homes in Arun District during years 6-10 of the plan period which can contribute to neighbouring authorities' unmet housing need. The strategic sites of Angmering North and Littlehampton - West Bank potentially contribute to the unmet need across the widest range of neighbouring authorities, although residents could travel from any of the locations. The potential impact of higher levels of out-commuting to neighbouring local authority areas on each of the sustainability objectives and how this would influence the scoring of the strategic sites was assessed in the SA Report. The assessment concluded that the overall impact of increased out-commuting will not have significant impact on the sustainability appraisal results.

**Table 12 SA Findings of the Strategic Residential Site Allocations as well as Angmering South and East**

	SD1 - Pagham South	SD2 - Pagham North	SD3 - West of Bersted	SD4 - Littlehampton - West Bank	SD5 - Barnham/ Eastergate/ Westergate (BEW)	SD6 - Fontwell	SD7 - Yapton	SD8 - Ford	SD9 - Angmering North	SD10 - Climping	SD11 - Angmering South and East
<b>SA Objectives</b>	400 units	800 units	2,500 units	1,000 units	2,300 units	400 units	400 units	1,500 units	800 units	300 units	250 units
1. Achieve successful and inclusive communities.	+	+	+	+	+	+	+	+	+	+	+
2. Improve the health and wellbeing of the population and reduce inequalities in health	++/--?	++/-	++/--?	++/--?	++/--?	+/-	++/--?	++/--?	++/--?	++/--?	++/--?
3. Ensure the delivery of high quality, sustainably constructed, and affordable homes	+	+	++	++	++	+	+	++	+	+	+
4. Ensure that Arun provides excellent social infrastructure	-	+	+	++	+	-	+	+	+	-	+
5. Improve the vibrancy of Arun's town centres	0	0	+	+	0	0	0	0	0	0	0
6. Ensure efficient and sustainable movement within and beyond Arun	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++	+++
7. Preserve, restore or enhance Arun's biodiversity and geodiversity	--?	--?	--?	-?	0?	0?	0?	-?	-?	0?	0?
8. Maintain and improve water quality, and maximise water efficiency measures	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
9. Reduce flood risk	?	?	0?	--	?	0?	?	0?	?	0	0
10. Reduce air pollution	--?	--?	--?	--?	--?	--?	0	--?	--?	--?	--?
11. Avoid the loss of Best and Most Versatile agricultural land, reduce soil degradation/ contamination, and improve efficiency in land use	--	--	--	+?/-?	--	-	--	--/+?	--	--	--
12. Protect and enhance the historic environment	--?	--?	--?	--?	--?	-?	--?	--?	--?	--?	-?
13. Maintain and enhance Arun's landscape character and quality	-?	0?	-?	+?/--?	--?	-?	--?	--?	--?	-?	--?
14. Reduce the global, social and environmental impact of waste generation and consumption of resources by using sustainably produced and local products	-	-?	-	+	-	-	-	+?/-	-	-	-
15. Ensure a diverse and thriving economic base to support Arun's growth	--	++/-	++	++	++/-	--	--	++/-	++/-	--	++/--

## Sustainability Appraisal Findings for the Strategic Employment Site Allocations

- 1.102 The SA findings for the strategic employment site allocations that have been considered for allocation in the further Main Modifications to the Arun Local Plan are described in detail in **Chapter 5** of the SA Report. The assumptions used to appraise the employment options are presented in **Appendix 8** while the detailed SA matrices for the sites are presented in **Appendix 9** of the SA Report.
- 1.103 The strategic employment land allocations in the further Main Modifications to the Arun Local Plan are as follows: Enterprise Bognor Regis (68ha), Angmering (3ha), Courtwick (1.5ha) and North Littlehampton (2ha). As identified above, the sites at Courtwick and North Littlehampton are not considered further in this section of the SA as planning permission has been secured for these sites.
- 1.104 In December 2017, a re-appraisal of the strategic employment site at Angmering was undertaken as the site boundary was revised and the site area reduced from 8ha to 3ha.
- 1.105 The scores for the strategic employment sites are presented in **Table 13**, and it should be noted that these scores are prior to mitigation.
- 1.106 Significant positive effects are recorded in relation to SA objectives 4: Social Infrastructure, 5: Regeneration of Town Centres, 6: Transport, and 15: Economy. Significant negative effects are identified in relation to SA objectives 8: Water Quality, 10: Air, 11: Soil and 13: Landscape. It is recognised that there is potential to mitigate many of the potential negative effects identified in particular through design of the development and incorporation of appropriate policy safeguards within the Local Plan. Furthermore, several of the effects are uncertain depending on the eventual development proposals that come forward for a site.

**Table 13 SA Findings of the Strategic Employment Sites**

SA Objectives	Angmering	Enterprise Bognor Regis
1. Achieve successful and inclusive communities.	+	+
2. Improve the health and wellbeing of the population and reduce inequalities in health	++/-	++/-
3. Ensure the delivery of high quality, sustainably constructed, and affordable homes	0	0
4. Ensure that Arun provides excellent social infrastructure	+?	++
5. Improve the vibrancy of Arun's town centres	0	++
6. Ensure efficient and sustainable movement within and beyond Arun	++?	++?
7. Preserve, restore or enhance Arun's biodiversity and geodiversity	0?	-?
8. Maintain and improve water quality, and maximise water efficiency measures	--?	--?
9. Reduce flood risk	0	-?
10. Reduce air pollution	-?	--?
11. Avoid the loss of Best and Most Versatile agricultural land, reduce soil degradation/ contamination, and improve efficiency in land use	--	--
12. Protect and enhance the historic environment	-?	-?
13. Maintain and enhance Arun's landscape character and quality	--?	--?
14. Reduce the global, social and environmental impact of waste generation and consumption of resources by using sustainably produced and local products	-	-
15. Ensure a diverse and thriving economic base to support Arun's growth	++	++

## Sustainability Appraisal Findings for the Policies

- 1.107 The SA findings for the Vision and the strategic objectives, as well as the policies that are included in the further Main Modifications to the Arun Local Plan are described in detail in **Chapter 6** of the SA Report. The detailed SA matrices of the policies can be found in **Appendix 10**.
- 1.108 In light of the comments received during the Examination process, a number of policies have been revised by Arun District Council as part of the preparation of the further Main Modifications to the Arun Local Plan. These policies were subject to SA in December 2017. For completeness and consistency, the policies appraised for the Main Modifications which were not subject to change are also presented in Chapter 6 of the SA Report.
- 1.109 Since all of the modified and unmodified policies have been appraised and as the plan has progressed significantly through the Local Plan process, it was determined that there were no other reasonable alternative policies which could be assessed.
- 1.110 The scores for the policy options are presented in **Table 14** overleaf.
- 1.111 The majority of the policies will have either a minor positive or a negligible effect on the SA objectives. Significant positive effects are recorded across all SA objectives. Significant negative effects are recorded for SA objectives 7: Biodiversity and Geodiversity, 8: Water, 11: Soil, 12: Historic Environment and 13: Landscape. These negative effects mostly relate to the site specific housing policies H SP2a, H SP2b and H SP2c and to the employment policies EMP SP3 and EMP DM2.

Table 14 Summary of SA scores for the Arun Local Plan Policies

SA Objective	1. Communities	2. Health and Wellbeing	3. Housing	4. Social Infrastructure	5. Regeneration	6. Transport	7. Biodiversity and Geodiversity	8. Water	9. Flooding	10. Air	11. Soil	12. Historic Environment	13. Landscape	14. Waste and Resources	15. Economy, Employment and Education
Policy															
Vision	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Strategic Objectives	++	+	++	+	++	++	+	+?	+?	+	+?	++	++	+	++
SD SP1	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
SD SP1a	+	+	++	+	++	++	+	+?	+?	+	+?	+	+?	+	++
SD SP2	+	+	+	+	+	+	+	0	+	+	++	+/-	++	+	+
C SP1	+	+	-	+	+	+	+	0	+	+/-	++	+/-	++	+	+
GI SP1	0	+	-	+	+	+	+	0	+	++	+	++	+	+	+
SD SP3	0	+	-	0	+	+	+	0	+	+	+	+	+	+	+
LAN DM1	0	0	-	0	+	+	+	0	+	+	+	++	++	+	+/-
LAN DM2	0	0	-	0	+	0	0	0	0	0	0	++	++	0	+/-
EMP SP1	+	+	+	++	++	+	-?	-	-	-?	-	-	-	-	++
EMP SP2	++	+	+	++	++	+	+/-	-?	+/-	+	+/-	+/-	-?	+/-	++
EMP SP3	+	+/-	0	++	+	++	+/-	+	-	+	++	-?	-?	-	++
EMP DM1	+	+	+	+	+	+	+	+?	+	+?	-?	+/-	-	-	++
EMP DM2	+	+	0	++	++	++	+	+	+/-	+	-?	-?	-?	0	++
SKILLS SP1	++	+	+	+	+	+	0	0	0	0	0	0	0	0	++
TEL SP1	++	0	0	0	0	0	0	0	0	0	0	0	0	0	++
TEL DM1	++	+	0	0	0	0	0	0	0	0	0	+	+	+	++
RET SP1	+	+?	0	++	++	+	+?	0	+	+	+	+/-?	+	0	++
RET DM1	+	+?	+	+	++	+	0	0	0	+	0	+/-?	+	+?	++
TOU SP1	+	+?	0	++	++	+	+	+	+	+	+	+	+	0	++
TOU DM1	+	+	0	++	++	+/-	+	0	+	+/-	+/-	+	+	0	++
SO DM1	0	0	-	0	0	+	+	0	+	+	++	0	+	+?	+/-
HOR DM1	+	+	0	0	0	+/-	+	+	+	+/-	+	+	+	0	++
RET DM2	+	0	0	0	+	+	+?	0	+	+	+	+	+	+	+
EQU DM1	+	0	0	0	0	+	-	+	0	0	+	+	+	+	+
H SP1	+	+	++	+	+	+	-?	+	+/-	+/-	+/-	-	-	+/-	0
H SP2	+	++	+/-?	++	+	++	+	+	+	+	+	+	+	0	+
H SP2a - SD1	+	+/-	+/-?	+	+	++	+	-?	+	+	++	+	+	-	++
H SP2a - SD2	+	+/-	+/-?	+	+	++	+	-?	+	+	++	+	+	-	++
H SP2a - SD3	+	+/-	+/-?	++	+	+/-	+	+	+	+/-	++	+	+	-	++
H SP2b - SD4	+	+/-	+/-?	++	++	++	-?	+	++	+/-	+/-?	+	+/-	+/-	++
H SP2c - SD5	+	+/-	+/-?	++	+	+/-	+	+	+	+/-	++	+	+/-	-	++
H SP2c - SD6	+	+/-	+/-?	0	0	+	+	+	+	+	-	+	+	-	-
H SP2c - SD7	+	+/-	+/-?	+	+	+	+	+	+	+/-	++	+	+/-	-	+
H SP2c - SD8	+	+/-	+/-?	++	+	+/-	-?	+	+	+/-	-?	+	+/-	+/-?	++
H SP2c - SD9	+	+/-	+/-?	+	0	+	+	+	+	+	++	+	+	-	++
H SP2c - SD10	+	+/-	+/-?	++	+	+/-	+	+	+	+/-	++	+	+	-	++
H SP2c - SD11	+	+/-	+/-?	0	0	+	+	+	+	+	++	+	+	-	+
H DM1	+	+	+/-?	0	0	0	0	0	0	0	0	0	0	0	0
AH SP2	+	0	+/-?	0	0	0	0	0	0	0	0	0	0	0	0
H SP3	+	+	++	+	+	+/-	-?	-?	-	+/-	-	+	+/-	-	0
H SP4	+	+	++	0	0	+	0	0	0	0	0	+	+	-	+
H DM2	+	+	++	+	+	+	0	0	0	+	+	+?	+?	0	0
H SP5	+	+	++	+	0	+/-	+	+	+	+/-	+	+	+	+	+
H DM3	+	+/-	++	-	0	-?	+/-	+/-	-	-	+/-	+/-	+	+	++
H DM4	0	-	++	-	0	+/-	+	-	-	-	+/-	+	+	+	0
D SP1	++	+	++	0	+	0	+	0	0	+	+	+	+	0	0
D DM1	++	++	++	+	+	+	+	0	-	+	0	+	++	+	0
D DM2	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0
D DM3	0	+	+	0	0	0	0	0	0	0	0	+	0	0	0
ECC SP1	0	+	+	0	0	0	++	++	++	0	0	0	0	0	0
ECC SP2	+	+	+	0	0	0	+	0	+	++	0	0	0	++	0
ECC DM1	+	+	0	0	0	-	+	-	-	++	-	+	+	++	+
HWB SP1	+	++	0	++	++	++	+	0	+	+	+	0	+	0	0
OSR DM1	+	++	0	++	+	+	+	0	+	0	+	+	++	0	0
OSR SP1	++	++	0	+	+	0	+	0	+	+	+?	0	+	++	0
T SP1	+	+	0	0	+	++	+	0	+	++	0	0	0	0	++
T DM1	+	+	0	+	+	++	0	0	0	++	0	0	0	0	+
T SP2	+	+	0	+	+	++	+/-	+	+	+	0	0	+	0	+
T SP3	+	+	0	0	+/-	+/-	+/-	0	0	+/-	0	0	+/-	0	++
T DM2	+	+	0	+	++	+/-	0	0	0	+/-	0	0	0	0	++
HER SP1	0	0	-	0	+	0	0	0	0	0	0	++	+	+	+
HER DM1	0	0	-	+	+	0	+	0	0	0	0	++	+	+/-	+
HER DM2	0	0	-?	0	+	0	0	0	0	0	0	++	+	+	+
HER DM3	0	+	-?	0	+	0	+	0	+	0	0	++	+	0	+
HER DM4	0	+	0	0	+	0	+	0	+	0	0	++	0	0	+
HER DM5	0	+	0	0	0	+	0	0	0	+?	0	+	+	0	0
HER DM6	0	0	0?	0	0	0	0	0	0	0	0	++	0	0	0
ENV SP1	0	0	-?	0	0	0	++	0	+	0	+	+	+	0	0
ENV DM1	0	+	-?	0	0	0	++	0	+	0	+	+	+	0	0
ENV DM2	0	+	-?	0	0	+	++	0	+	+	+	+	+	0	0
ENV DM3	0	0	-?	0	0	0	++	0	+	0	+	+	+	0	0
ENV DM4	0	0	0	0	0	0	++	0	+	+	0	+	+	0	0
ENV DM5	0	0	0	0	0	0	++	0	+	+	+	+	+	0	0
W SP1	0	+	0	0	0	0	+	++	++	+	0	0	0	0	0
W DM1	0	+	0	0	0	0	+	++/-	++	+	0	0	0	0	0
W DM2	0	+	0	0	0	0	+	+	++	0	+	+	+	0	0
W DM3	0	+	0	0	0	0	+	+	++	0	0	0	+	0	0
W DM4	0	+	0	0	0	0	++	0	++	0	++	0	+	0	0
NR DM1	0	+	-?	0	0	0	+	0	0	++	0	0	++	0	-?
WM DM1	0	0	-?	0	0	0	+	0	+	+	0	+	++	0	-?
QE SP1	0	+	+	+	0	0	+	+	0	0	0	0	0	0	+
QE DM1	0	+	+	+	0	0	+	0	0	0	0	0	0	0	+
QE DM2	0	+	+	0	0	0	+	0	0	0	0	0	++	+	+
QE DM3	0	++	+	0	0	0	+	0	0	++	0	0	0	0	+/-
QE DM4	0	+	+	0	0	0	+	+	0	+	+	+	+	+	+
INF SP1	+	++	-?	++	0	++	+	++	++	+	0	+	+	+	+?
INF SP2	+	+	0	+	0	+/-	+?	+	+?	+/-	?	+?	+?	-	++

## Cumulative, Secondary and Synergistic Effects

### SA objective 1: Achieve successful and inclusive communities

- 1.112 The measures included in the Arun Local Plan to provide employment land, increase economic growth, and raise skill levels to increase employability will help to reduce poverty and social exclusion by increasing the range and quantity of available jobs. Therefore, significant positive effects are identified for the strategic objectives and policies EMP SP2 and SKILLS SP1 (Chapter 8 Employment & Enterprise). Two further policies within this chapter are also likely to result in significant positive effects in relation to this SA objective as they will help to reduce social isolation and the cost of living for residents by delivering improved telecommunications infrastructure in the District (TEL SP1, and TEL DM1). Design policy D DM1 (Chapter 13) will have a significant positive effect on this objective as it will help to reduce levels of crime and fear of crime through appropriate design of new developments (e.g. use of lighting, well defined interconnecting routes and spaces, natural surveillance by fronting buildings towards pathways and open spaces). Health and Recreation policy OSR SP1 (Chapter 14) is also likely to have a significant positive effect as the development of allotments provides opportunities for social inclusion and encourages a greater sense of community, in addition to providing a cheap source of food which may help to alleviate poverty. The remaining policies in the Plan are identified as having either a minor positive or a negligible effect on this SA objective.
- 1.113 All strategic sites were appraised for their effects on empowering communities, poverty, social exclusion, crime and fear of crime. Indirect minor positive effects are likely for all strategic sites and small sites contained in the Neighbourhood Development Plans as the Plan will increase the quantity and type of new housing, in addition to increasing the provision of new job opportunities from the allocation of employment sites which could help to improve overall levels of prosperity in the District.
- 1.114 No significant negative effects were identified during the appraisal of strategic sites or policies.
- 1.115 Overall, the further Main Modifications to the Arun Local Plan is therefore considered to have a cumulative **minor positive effect** on achieving successful and inclusive communities.

### SA objective 2: Improve the health and wellbeing of the population and reduce inequalities in health

- 1.116 The strategic residential and employment sites included within the Arun Local Plan are expected to have mixed effects to varying degrees on public health and wellbeing in the District. The positive effects identified are as a result of sites being within walking distance (800m) of open spaces/sports facilities, Public Rights of Way (PROWs), footpaths or cycle paths which may encourage residents to be more active outdoors, thus promoting physical activity and healthy lifestyles. Negative effects are recorded where sites which contain existing open spaces/sports facilities, PROWs, footpaths or cycle paths, that might otherwise be of benefit in terms of encouraging more active lifestyles, may be lost as a result of development thereby having adverse impacts on the health and wellbeing of the population. In addition, strategic sites which are surrounding by existing sensitive receptors (such as residential properties, schools or hospitals) may impact on local health and wellbeing in terms of increased noise and other forms of pollution which may occur due to the construction required to deliver the proposed high levels of development.
- 1.117 The appraisal of sites (without policy mitigation – see Table 7.1 and Table 7.2) identified mixed effects (significant positive and significant but uncertain negative) for the majority of strategic residential sites (Angmering North, BEW, Climping, West of Bersted, Ford, Littlehampton - West Bank, Pagham South and Yapton) as well as for Angmering South and East. Mixed effects comprising of significant positive and minor negative effects are identified for the strategic employment allocations and the strategic residential site at Pagham North. A minor positive and minor negative effect is expected for the site at Fontwell.
- 1.118 Policy H SP2 (Chapter 12: Housing Delivery) is expected to have a significant positive effect. This policy promotes permeability at strategic sites to allow for walkable environments, in addition to providing well-connected green spaces, which may encourage residents to undertake journeys by foot and partake of more active and healthier lifestyles. Mixed effects (significant positive and

minor negative) are expected for policies H SP2a (SD3 - West of Bersted), H SP2b (SD4 – Littlehampton – West Bank) and H SP2c (SD5 – BEW and SD8 - Ford) as these strategic sites will incorporate new healthcare facilities and/or sports pitches as part of their developments. The minor negative effects are expected as the sites are within close proximity to industrial estates, wastewater treatment works, or A roads which may impact on the amenity of the sites' future occupants due to noise, light, or odour pollution.

- 1.119 The policies in Chapter 14: Health, Recreation & Leisure of the Arun Local Plan (HWB SP1, OSR DM1 and OSR SP1) are expected to have significant positive effects this SA objective. These policies would help to ensure that areas of open space are accessible, recreation and sport facilities are available, and that essential infrastructure such as healthcare facilities are available to meet the needs of the growing population.
- 1.120 Policies D DM1 (Chapter 13 Design) and QE DM3 (Chapter 21 Quality of the Environment) are also expected to have significant positive effects on this SA objective. Policy D DM1 specifically requires a high standard of inclusive and adaptable design in developments including 'legible' walking and cycling routes, and the provision/retention of green space to encourage health and wellbeing. Policy QE DM3 contains measures to directly help to improve local air quality (such as improving access to sustainable modes of transport and encouraging the use of cleaner fuels onsite at major developments) thereby limiting the potential for reductions in air quality in Arun which will be of importance for the District's public health.
- 1.121 A significant positive effect is identified for policy INF SP1 (Chapter 22 Infrastructure Provision & Implementation) as it supports the provision of health care facilities and open space to improve public health in Arun.
- 1.122 No significant negative effects were identified during the appraisal of policies. The majority of remaining policies are likely to have a minor positive effect on this SA objective, with a number of remaining policies having no effect.
- 1.123 Overall, the Arun Local Plan is therefore considered to have a cumulative **minor positive** effect in relation to improving the health and wellbeing of the population and reducing inequalities in health.

### **SA objective 3: Ensure the delivery of high quality, sustainably constructed, and affordable homes**

- 1.124 All the strategic residential sites and small sites contained in the Local Plan and Neighbourhood Development Plans will have a positive effect on this SA objective as all would provide for the development of housing to meet the identified need for 919 new homes per annum in Arun District up to 2031. Four of the strategic residential site allocations would provide for the delivery of a higher amount of housing (more than 1,000 units) than the other sites - BEW, Ford, Littlehampton - West Bank, and West of Bersted – and, therefore, will have significant positive effects on this SA objective. The remaining strategic sites will have a minor positive effect on this SA objective. The strategic employment sites at Angmering and Enterprise Bognor Regis will have negligible effects on this SA objective.
- 1.125 A significant positive effect is identified for the strategic objectives as they seek to plan and deliver a range of housing mix and types to meet the District's housing requirements and the needs of Arun's residents and communities, ensuring that issues of affordability and the provision of appropriate levels of affordable housing are addressed.
- 1.126 Sustainable Development policy SD SP1a (Chapter 6) is expected to have a significant positive effect on this objective as it supports the delivery of at least 20,000 homes over the plan period which are of an appropriate scale and tenure including provision for gypsies, travellers and travelling showpeople. Design policies D SP1 and D DM1 (Chapter 13: Design) will also have a significant positive effect on this SA objective as they seek to ensure that development proposals are designed to a high standard and have considered adaptability, usability and climate change mitigation. In addition, proposals must reflect the local needs of the area including density, mix and scaling which cumulatively will help to deliver high quality, sustainably constructed and affordable homes.
- 1.127 All of the policies in Chapter 12: Housing Delivery of the Arun Local Plan are expected to have either significant positive effects or mixed effects which include significant positive effects. Policies

H SP1, H SP3, H SP4, H DM2, H SP5, H DM3 and H DM4 are likely to have significant positive effects on this SA objective as they support the phased delivery of at least 20,000 homes over the plan period including a range of housing types to meet local needs in addition to homes to help meet the housing needs of neighbouring authorities.

- 1.128 Mixed effects (significant positive/uncertain minor negative) are expected for housing policies H SP2, H SP2a, H SP2b, and H SP2c. Significant positive effects are identified as the policies specify design and infrastructure requirements which development at strategic housing sites in Arun should meet. The uncertain minor negative effects are identified as the policies require the strategic sites to be delivered in line with Policy INF SP1 and the Infrastructure Delivery Plan which may impact on the deliverability of the schemes should new infrastructure be required to support the development of the sites.
- 1.129 Housing policies H DM1 (Housing Mix) and AH SP2 (Affordable Housing) are expected to have mixed effects (significant positive/uncertain minor negative) as they support the delivery of an appropriate mix of market and affordable dwellings including family sized accommodation, however, it is possible that the delivery of affordable homes as part of new housing schemes (11 units or more) may affect viability resulting in some developments not being delivered.
- 1.130 No significant negative effects were identified during the appraisal of strategic sites or policies. However, minor negative and minor negative uncertain effects were identified for 17 of the policies as they seek to protect the countryside, green infrastructure, and the historic and natural environment which may limit the locations at which new residential developments are acceptable, and therefore may impact on the delivery of new homes in the District.
- 1.131 The majority of the remaining policies in the Plan are identified as having minor positive or negligible effects on this SA objective.
- 1.132 Overall, the Arun Local Plan is therefore considered to have a cumulative **significant positive effect** on ensuring the delivery of high quality, sustainably constructed and affordable homes.

#### **SA objective 4: Ensure that Arun provides excellent social infrastructure**

- 1.133 The population growth that will result from the development of at least 20,000 homes in Arun over the Local Plan period could place pressure on existing services and facilities. However, the Arun Local Plan supports the maintenance, enhancement and delivery of new infrastructure and services such as healthcare facilities, social infrastructure, utility services, open spaces, sports & recreation facilities, public services, etc. and requires such essential infrastructure to be in place before the associated development comes forward. Therefore, significant positive effects are identified in relation to policies in the Infrastructure (INF SP1) (Chapter 22), and Health and Recreation (HWB SP1 and OSR DM1) (Chapter 14) sections of the plan.
- 1.134 Housing policies (Chapter 12) H SP2, H SP2a (SD3 - West of Bersted), H SP2b (SD4 - Littlehampton - West Bank), and H SP2c (SD5 - BEW, SD8 - Ford and SD10 - Climping) will have significant positive effects on this SA objective. Proposals for development at West of Bersted, Littlehampton - West Bank, BEW, Climping and Ford should support the delivery of a range of facilities and services including healthcare facilities, libraries, local centres, and retail, commercial and community facilities. Furthermore, the policies encourage developments to be designed to ensure pedestrian permeability and accessibility to sustainable transport which will allow access to social infrastructure further afield.
- 1.135 Retail policy RET SP1 (Chapter 9) will have a significant positive effect on this SA objective as it seeks to ensure the vitality of town centres, local service centres, and village/suburban centres in Arun which will support the maintenance and enhancement of existing services /facilities and the delivery of new social infrastructure to these areas. Significant positive effects are also identified for policies EMP SP1, EMP SP2, EMP SP3, EMP DM2 (Chapter 8 Employment & Enterprise) and TOU SP1 and TOU DM1 (Chapter 10 Tourism) as they steer tourism and employment development to towns and other accessible locations which means that people are more easily able to access the existing services and facilities that are concentrated at these locations.
- 1.136 Improvements to the transport network, particularly sustainable transport links, will also provide improved access to social infrastructure.

- 1.137 All strategic sites that were considered for inclusion in the Arun Local Plan have been appraised in relation to their level of access to services and facilities (without policy mitigation). The strategic employment site at Enterprise Bognor Regis and the Littlehampton - West Bank strategic residential site are likely to have significant positive effects on this SA objective by providing a very good range of community services and facilities, and public transport links. The strategic employment site at Angmering and six strategic residential sites at Angmering, BEW, Ford, Pagham North, West of Bersted and Yapton, as well as Angmering South and East, will have a minor positive but uncertain effect as these areas are classified as having a limited range of services and facilities. The effect is recorded as uncertain as residents may need to travel to access a wider retail provision and additional community services in the main settlement areas. The remaining strategic residential sites at Climping, Fontwell and Pagham South will have a minor negative effect on this objective as they are not within or adjacent to any of the areas identified in the hierarchy of retail centres.
- 1.138 No significant negative effects were identified during the appraisal of strategic sites or policies. Twenty-seven policies are likely to have minor positive effects on this SA objective, two policies will have minor negative effects, while the remaining policies in the Plan are identified as having negligible effects.
- 1.139 Overall, the Arun Local Plan is therefore considered to have a cumulative **significant positive effect** on ensuring that Arun provides excellent social infrastructure.

#### **SA objective 5: Improve the vibrancy of Arun's town centres**

- 1.140 The location of strategic residential and employment sites will not have a direct effect on promoting development in key sectors or protecting or enhancing locations for cultural and leisure activities. However, strategic sites that are within or adjacent to Bognor Regis and Littlehampton could have a minor positive effect as they could contribute to regeneration activities for these two towns, and it is possible that developer contributions associated with large-scale housing developments may be used to help enhance cultural and leisure facilities. As such, the strategic residential sites at Littlehampton - West Bank and West of Bersted will have minor positive but uncertain effects on this SA objective. Negligible effects are identified for the remaining strategic residential sites as well as for Angmering South and East, and the Angmering strategic employment site in relation to this SA objective. The strategic employment site at Enterprise Bognor Regis and the employment land at Courtwick and North Littlehampton (3.5ha) are likely to have significant positive effects on this SA objective by contributing to the regeneration of Bognor Regis and Littlehampton town centres through employment growth.
- 1.141 The strategic objectives will have a significant positive effect on this SA objective as they seek to create vibrant, attractive, safe and accessible towns and villages that provide a wide range of uses and which are a focus for quality shopping, entertainment, leisure, tourism and cultural activities. Policies in the Sustainable Development (SD SP1a) (Chapter 6), Employment (EMP SP1, EMP SP2 and EMP DM2) (Chapter 8), Retail (RET SP1, RET DM1) (Chapter 9), Tourism (TOU SP1, TOU DM1) (Chapter 10), and Transport (T DM2) (Chapter 15) chapters in the Arun Local Plan will have significant positive effects on this SA objective as they seek to steer retail/commercial development, tourist attractions/facilities, and other employment opportunities particularly in the knowledge and cultural sectors, towards Littlehampton and Bognor Regis which will contribute to the regeneration of these centres. Furthermore, Policy HWB SP1 (Chapter 14 Health & Recreation) encourages the provision of arts and cultural facilities. A number of other policies would also have minor positive effects on this SA objective. Policy H SP2b (SD4 - Littlehampton - West Bank) will also have a significant positive effect as it supports the development of Littlehampton - West Bank which will be key to supporting the future regeneration of the town and the Littlehampton Economic Growth Area.
- 1.142 No significant negative effects were identified during the appraisal of strategic sites or policies.
- 1.143 Overall, the Arun Local Plan is therefore considered to have a cumulative **significant positive effect** on improving the vibrancy of Arun's town centres.

#### **SA objective 6: Ensure efficient and sustainable movement within and beyond Arun**

- 1.144 All strategic residential and employment sites are within 800m of two or more sustainable transport links (bus stops, railway stations or cycle paths) and so are likely to have a significant

positive effect on this objective by reducing journeys undertaken by car. However, sustainable transport infrastructure may be incorporated into the developments – this may include improved or additional bus services or new cycle routes and footpaths – which will be determined through the detailed proposals for the sites and are not yet known. Therefore, significant positive but uncertain effects are identified for the strategic residential and employment sites.

- 1.145 The strategic objectives will have a significant positive effect on this SA objective as they seek to reduce the need to travel and promote sustainable forms of transport. Policies T SP1, T DM1 and T SP2 (Chapter 15 Transport) are likely to have significant positive effects in relation to this SA objective because they seek to encourage a modal shift to sustainable transport, in particular improved walking and cycling which will be achieved by linking development sites to pedestrian and cycle networks. Policy T SP3 seeks to safeguard the main road network which could be seen to encourage and facilitate ongoing car use and therefore, mixed effects (significant positive and minor negative effects) are expected for this policy.
- 1.146 Policies H SP2 and H SP2a (SD1 – Pagham South and SD2 – Pagham North) (Chapter 12: Housing) will have a significant positive effect on this SA objective while policies H SP2a (SD3 – West of Bersted), H SP2b (SD4 - Littlehampton – West Bank) and H SP2c (SD5 – BEW) will have significant positive effects combined with minor negative effects. The positive effects are identified as the policies require the strategic residential sites to be designed to provide access to existing sustainable transport modes and to incorporate new sustainable transport infrastructure into the developments. The minor negative effects are identified as the development of some strategic residential sites will deliver improvements to the road network which may encourage the continued use of private cars for travel. For example, Pagham South and Pagham North should provide linkages and accessible pedestrian and cycle routes to Bognor Regis town centre; West of Bersted should provide a road/pedestrian/cycle link between the A259 and Chalcraft Lane including facilitating the cycle route to Pagham and enhancing the A259 cycle route, in addition to providing improvements to the A259 between Bersted and Drayton; Littlehampton - West Bank should provide new linkages between the East and West Bank areas, improved access to the river and town centre, gate free cycle and pedestrian links along the West Bank to contribute to the Littlehampton to Arundel West Bank cycle path, as well as providing improvements to the A259 between Climping and Littlehampton; and BEW will deliver a package of sustainable transport measures as well as providing a new A29 route through the BEW site allocation.
- 1.147 Significant positive effects are identified for policy EMP SP3 (Chapter 8 Employment & Enterprise) as it directs employment to the town centres where the provision of sustainable transport links is greatest thereby reducing the need for private car journeys. Policy EMP DM2 within the same chapter will also have a significant positive effect as it requires proposals for the development of strategic employment sites to deliver a package of sustainable transport measures, including improvements to the existing road network. Additionally, policy HWB SP1 (Chapter 14 Health & Recreation) is likely to have a significant positive effect as it specifically supports the use and creation of sustainable modes of transport (e.g. safe, well promoted, walking and cycling routes) and seeks to create developments which are located in close proximity of a range of housing, employment and service opportunities, thereby reducing the need to travel by unsustainable modes of transport. Finally, a significant positive effect is identified for policy INF SP1 (Chapter 22 Infrastructure) as it supports the delivery of infrastructure and services including sustainable transport improvements.
- 1.148 No significant negative effects were identified during the appraisal of policies. Minor positive effects were identified for a number of other policies with the majority of remaining policies likely to have negligible effects.
- 1.149 Overall, the Arun Local Plan is therefore considered to have a cumulative **significant positive effect** on ensuring efficient and sustainable movement within and beyond Arun.

### **SA objective 7: Preserve, restore or enhance Arun's biodiversity and geodiversity**

- 1.150 Three strategic residential sites (Pagham South, Pagham North and West of Bersted) will have potentially significant negative effects on this SA objective as, in the absence of avoidance and/or mitigation measures (e.g. mitigation measures contained in the strategic residential site specific policies in the Local Plan), the level of housing proposed is likely to adversely disturb populations of qualifying species, thereby undermining the integrity of the Pagham Harbour SPA/Ramsar.

- 1.151 Three strategic residential sites (Angmering North, Ford and Littlehampton - West Bank) and the strategic employment site at Enterprise Bognor Regis were identified as having a potential minor negative effect, with the remainder of the site allocations (BEW, Climping, Fontwell, Yapton, Angmering South and East, and Angmering strategic employment site) most likely to have a negligible effect on this SA objective.
- 1.152 Two committed strategic housing developments (land at Courtwick Lane, Littlehampton, and land north of Toddington Lane, Littlehampton) include land allocated for strategic employment development and contain a combined total of 95.5ha within the Arun Valley Functionally Connected Land IRZ2 including some greenfield land. Two strategic housing sites include land within the Arun Valley Functionally Connected Land IRZ2, namely Ford (17ha) and LEGA (57.3ha). The HRA (2017) determines that as these allocations are positioned 8-10km from the Arun Valley SPA and towards the edge of the Bewick's swans' known foraging range of 10km, there is a relatively low risk to the winter survival rate of the SPA population (therefore a minor not a significant negative effect is identified for these sites). Furthermore, minor negative effects are also identified for the Arundel Neighbourhood Plan allocations as, although they are within 6km of the SPA, the sites comprise of either previously developed land or scrubby wasteland and their development is not considered to present a high risk to the SPA.
- 1.153 Significant positive effects are expected for this SA objective in relation to the majority of policies within Chapter 17 Natural Environment (policies ENV SP1, ENV DM1, ENV DM2, ENV DM3, ENV DM4, and ENV DM5) as their primary purpose is to preserve, restore and enhance Arun District's biodiversity and geodiversity, and in the case of policy ENV DM5, the creation of green infrastructure in new developments. Policy ECC SP1 (Chapter 13 Design) is also likely to have a significant positive effect on this objective as it requires development proposals to be designed to take into account connectivity to green infrastructure which is likely to have benefits for biodiversity. Policy W DM4 (Chapter 18 Water) is likely to have a significant positive effect as it requires development proposals to preserve and enhance coastal habitats such as vegetated shingle.
- 1.154 Housing policies H SP2b (Littlehampton - West Bank) and H SP2c (Ford) (Chapter 12: Housing Delivery) are likely to have mixed effects (significant negative and minor positive) as the policies aim to enhance the natural environment by providing biodiversity rich open spaces, however, they do not refer to the recommendations from the HRA (2017). The HRA recommends that planning applications for these sites should be supported by overwintering bird surveys and impact assessments, with mitigation measures to include adjustments to the form, scale and layout of the development and/or enhancement of alternative areas of supporting habitat nearby (e.g. through a conservation land management agreement). The HRA concludes that this approach to survey, impact assessment and mitigation is intended to be a cancellation measure, designed to neutralise the potential for adverse effects and should be incorporated within Local Plan policy.
- 1.155 Overall, the Arun Local Plan is therefore considered to have a cumulative **minor positive effect** on preserving, restoring or enhancing Arun's biodiversity and geodiversity.

### **SA objective 8: Maintain and improve water quality, and maximise water efficiency measures**

- 1.156 Eight of the strategic residential sites, as well as Angmering South and East, and both strategic employment site options will potentially have a significant negative effect on this SA objective as, according to the Arun Strategic Surface Water Management Study (2016), they would be served by Waste Water Treatment Works that are currently near capacity. However, according to the Infrastructure Delivery Plan (2016), Southern Water has stated that there are no capacity or environmental 'showstoppers' to development of these sites provided the necessary infrastructure is in place before the sites are developed. To offset the significant negative effects, the rate of new development and the provision of necessary infrastructure (including water supply and wastewater treatment infrastructure) must be coordinated.
- 1.157 Pagham North and Pagham South will also potentially have a significant negative effect on this SA objective as, according to the Infrastructure Delivery Plan (2016), accommodating additional flows at the Pagham Waste Water Treatment Works will be challenging within the environmental limits of the receiving waterbody. Furthermore, the HRA (2017) states that, with planned residential developments in the Pagham Wastewater Treatment Works' catchment exceeding

estimated 'headroom' by 779 dwellings over the plan period, it is not possible to rule out the risk of a significant deterioration in water quality, thereby undermining the integrity of Pagham Harbour SPA/Ramsar.

- 1.158 Significant positive effects are expected for this SA objective in relation to policy W SP1 (Chapter 18: Water) as it aims to protect and enhance water quality and encourage efficient water consumption. It states that the rate of new development and the provision of necessary infrastructure (including water supply and wastewater treatment infrastructure) must be coordinated and delivered prior to occupation of the development. Policy ECC SP1 (Chapter 13: Design) requires developments to be designed to take into account water efficiency measures. Significant positive effects are also identified for Policy INF SP1 as the policy supports the provision of new infrastructure and services including water supplies, sewerage works and sewerage systems.
- 1.159 Mixed effects (significant positive and significant negative) are identified for W DM1 (Chapter 18: Water), as it aims to protect water supply and quality, however, it does not incorporate the recommendations from the HRA requiring flows from residential developments which exceed the available headroom at Pagham Wastewater Treatment Works to be transferred to alternative discharge locations. The HRA states that, although a strategic solution would provide more certainty regarding the deliverability of residential allocations than one which relies on a capacity analysis during the development management process, this is considered adequate to ensure that no further deterioration of water quality within the Pagham SPA/Ramsar occurs as a result of implementation of the Local Plan. Mixed effects (significant negative/minor positive) are also expected for policy H SP2a (SD1 - Pagham South and SD2 - Pagham North) (Chapter 12: Housing Delivery) for these reasons.
- 1.160 Additional minor negative and mixed minor positive and minor negative effects are identified for six policies, with the remaining policies having either minor positive or negligible effects.
- 1.161 Overall, the Arun Local Plan is therefore considered to have a cumulative **minor positive effect** on maintaining and improving water quality, and maximising water efficiency measures.

### SA objective 9: Reduce flood risk

- 1.162 The development of strategic sites from the Arun Local Plan and small sites from the Neighbourhood Development Plans could reduce the extent of permeable surfaces in the District available for infiltration, and therefore increase flood risk.
- 1.163 One strategic residential site, Littlehampton - West Bank, will have a significant negative effect on this SA objective as the majority of the site is within Flood Zone 3a (reclassified from Flood Zone 3b by the Environment Agency). However, according to the Strategic Flood Risk Assessment (2016), the Infrastructure Delivery Plan (2016) and the Exception Test (2016), it will be possible to deliver a flood defence scheme (potentially formed of sheet piling along the River Arun and land raising, including the creation of embankment bunds) that ensures the safety of the development throughout its lifetime. The remaining strategic residential sites will have either a negligible or an uncertain effect with the supporting studies listed above stating that flood risk can be appropriately managed through site masterplanning along with the incorporation of flood mitigation and resilient design.
- 1.164 The strategic employment site allocation at Enterprise Bognor Regis is likely to have a minor negative but uncertain effect on this SA objective as the site contains a substantial portion of Flood Zone 3a land<sup>22</sup>. However, as stated above, the flood risk can be managed through site masterplanning along with the incorporation of flood mitigation and resilient design. A negligible effect is identified for the strategic employment site at Angmering.
- 1.165 Significant positive effects are likely for the policies contained in Chapter 18: Water (i.e. Policy W SP1, W DM1, W DM2, W DM3, and W DM4) as they specifically aim to reduce flood risk by steering development away from areas at high risk of flooding and by ensuring that mitigation measures such as SuDS have been incorporated into the design of the development. The strategic site of Littlehampton - West Bank referred to in policy H SP2b (Chapter 12: Housing Delivery) is

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<sup>22</sup> National Planning Practice Guidance identifies employment development as a 'less vulnerable use' which is suitable in areas of lower flood risk [Flood Zone 1, 2, and 3a]

expected to have a significant positive effect as it specifically requires proposals for this site to provide West Bank Flood Defence improvements including flood protection works, land raising, and new access points. Other significant positive effects are identified for policies ECC SP1 and INF SP1. Policy ECC SP1 (Chapter 13 Design) requires developments to be designed to take into account flood risk. Policy INF SP1 (Chapter 22 Infrastructure) supports the delivery of new infrastructure including flood defences.

- 1.166 No significant negative effects were identified during the appraisal of policies. The majority of the remaining policies in the Plan are identified as having minor positive or negligible effects on this SA objective.
- 1.167 Overall, the Arun Local Plan is therefore considered to have a cumulative **minor positive** effect on reducing flood risk although this is **uncertain** until detailed proposals for the strategic sites are known.

### **SA objective 10: Reduce air pollution**

- 1.168 The large-scale development proposed through the Arun Local Plan will inevitably result in an increase in greenhouse gas emissions from buildings but this will depend to some extent on the design of the development. Policies ECC SP2 and ECC DM1 (Chapter 13: Design) seek to increase energy efficiency and promote renewable and low carbon developments which will steer Arun's reliance away from fossil fuels to low carbon alternatives thereby reducing the level of greenhouse gas emissions in the District.
- 1.169 In terms of emissions from vehicle traffic, the Local Plan supports the provision of and improvements to the sustainable transport network. Modal shift, as encouraged by policies T SP1 and T DM1 (Chapter 15: Transport) will benefit local air quality in terms of reducing private car journeys which account for much of the carbon emissions and release of other air pollutants in Arun. Policy QE DM3 (Chapter 21: Quality of the Environment) contains measures to directly help to improve local air quality, such as improving access to sustainable modes of transport and encouraging the use of cleaner fuels onsite at major developments.
- 1.170 Policies H SP2a (SD3 – West of Bersted), H SP2b (Littlehampton – West Bank) and H SP2c (SD5 – BEW) are expected to have mixed effects (significant positive/minor negative) as their development will support the delivery of sustainable transport infrastructure along with improvements to the road network which may encourage the continued use of private cars for travel and thus the emission of greenhouse gases.
- 1.171 The Arun Transport Study (2017) identifies junctions which will experience 'severe' impacts from the increase in travel movements to the sites. All strategic residential sites, with the exception of Yapton, and Enterprise Bognor Regis strategic employment site are likely to experience significant negative effects on this SA objective (without policy mitigation) as they will have 'severe' impacts on nearby junctions, thereby increasing greenhouse gas emissions in the area. The strategic employment site at Angmering is likely to experience an uncertain minor negative effect on this SA objective. These negative effects are mitigated through the policies identified above and the employment policies EMP SP3 (Strategic Employment Land Allocations) and EMP DM2 (Enterprise Bognor Regis), and housing policy H SP2 (Strategic Site Allocations) which require proposals for strategic sites to incorporate the mitigation measures identified in the Arun Transport Study such as providing improvements to infrastructure and services, preparing Transport Assessments and Travel Plans, etc.
- 1.172 The majority of the remaining policies in the Plan are identified as having minor positive or negligible effects on this SA objective.
- 1.173 Overall, the Arun Local Plan is therefore considered to have a cumulative **minor positive** effect in relation to reducing air pollution.

### **SA objective 11: Avoid the loss of Best and Most Versatile agricultural land, reduce soil degradation/ contamination, and improve efficiency in land use**

- 1.174 The District contains large amounts of high quality 'Best and Most Versatile' agricultural land. The large scale development proposed through the strategic residential and employment site allocations included within the Arun Local Plan and the small sites contained in the Neighbourhood Development Plans will therefore result in mostly negative effects on this SA objective. Seven

strategic residential sites, as well as Angmering South and East, and both strategic employment sites are identified as having significant negative effects on this SA objective as development of these areas would result in the loss of Best and Most Versatile agricultural land. The strategic residential site at Fontwell is expected to have a minor negative effect on this objective as the Agricultural Land Classification classifies the site as predominantly Grade 3b (not BMV) agricultural land. Mixed effects are identified for the sites at Ford and Littlehampton - West Bank due to the brownfield and greenfield elements of the sites.

- 1.175 Policies SD SP2 and C SP1 (Chapter 7 Settlement) seek to confine higher levels of development to areas which already contain most of the development in Arun (i.e. within the defined built-up area boundaries) while also protecting the undeveloped character of the countryside. The protection of higher value agricultural soils (those of Grades 1, 2 and 3a) is addressed directly by Policy SO DM1 (Chapter 11 Soil) while the protection of coastal soils from erosion is promoted through Policy W DM4 (Chapter 18 Water). Efficient use of the local land resources (and specifically minerals) in Arun is expected to be promoted through Policy NR DM1 (Chapter 19 Natural Resources) as it seeks to safeguard mineral resource to ensure that these are not lost to non-mineral development. As Policy QE DM4 (Chapter 21 Quality of the Environment) would potentially allow for the re-use of brownfield land through the appropriate remediation of contaminated land and the protection of undeveloped sites in Arun, the effect on the SA objective for this policy is also likely to be significantly positive.
- 1.176 Policy EMP DM2 (Chapter 8: Employment & Enterprise) and policies H SP2a (SD1 – Pagham South, SD 2\_ Pagham North and SD3 – West of Bersted) and H SP2c (SD5 - BEW, SD7 - Yapton, SD9 - Angmering North, SD10 – Climping and SD11 - Angmering South and East) (Chapter 12: Housing Delivery) are expected to have a significant negative effect on high quality agricultural land as they promote the allocation of land for employment and housing on areas predominately comprising the best and most versatile agricultural land. A mixed effect (significant negative/minor positive) is identified for policy H SP2c (SD8 - Ford) as it predominately comprises the best and most versatile agricultural land with elements of previously developed land. A mixed effect (significant negative/minor positive) is expected for policy EMP DM2 as it will result in the loss of an extensive area of best and most versatile agricultural land, however, the policy does require developers to undertake surveys in relation to contaminated land and encourages remediation strategies to be developed.
- 1.177 The majority of the remaining policies in the Plan are identified as having minor positive or negligible effects on this SA objective.
- 1.178 Overall, the Arun Local Plan is therefore considered to have a cumulative **mixed effect (significant negative and minor positive)** in relation to avoiding the loss of Best & Most Versatile agricultural land, reducing soil degradation/contamination, and improving efficiency in land use.

### SA objective 12: Protect and enhance the historic environment

- 1.179 Arun District contains many designated and undesignated heritage features and assets which will require specific protection to ensure that their significance and that of their setting is preserved.
- 1.180 Nine strategic residential sites will have uncertain significant negative effects on this SA objective due to their potential impact on listed buildings and their settings, conservation areas, archaeological sites, historic landscapes and other sites of local importance for heritage. The strategic residential site at Fontwell and both strategic employment sites are expected to have potential minor negative effects. In all cases, the effects on cultural heritage assets are uncertain and will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features.
- 1.181 Policies HER SP1, HER DM1, HER DM 2, HER DM3, HER DM4 and HER DM6 (contained in Chapter 16 Building Conservation and Archaeological Heritage) are expected to have significant positive effects on this objective as they seek to conserve the significance of both designated and non-designated heritage assets and features including Conservation Areas, Areas of Special Character, Listed Buildings, and Scheduled Monuments. Significant positive effects are also identified for the Strategic objectives and policies LAN DM1 and LAN DM2 within the Settlement chapter of the Local Plan (Chapter 7) as they seek to protect the character of settlements within the District.

- 1.182 Although significant positive effects are not recorded for policies H SP2, H SP2a, H SP2b and H SP2c (Chapter 12 Housing Delivery), it is noteworthy that the policies contribute to the mitigation of the significant negative effects identified in relation to the strategic residential sites as they seek to conserve and enhance any important features, characteristics and assets of the local area.
- 1.183 Policy EMP SP3 (Chapter 8 Employment & Enterprise) is likely to have a significant negative but uncertain effect on the historic environment. Policy EMP DM2 (Chapter 8 Employment & Enterprise) is identified as having a mixed effect (minor positive/significant negative but uncertain effect) on the historic environment. The significant negative effects are identified as the policies seek to allocate employment sites that are within close proximity of heritage assets and features which may have potential adverse effects on the significance of these assets and their settings. Policy EMP DM2 includes some mitigation which states that new development should be of high quality, which was assumed to include the protection and enhancement of local character (minor positive effect). The impact of these negative effects could potentially be reduced if the policies are revised to incorporate appropriate assessment criteria for development proposals.
- 1.184 A number of other policies are identified as having mixed effects (minor positive/ minor negative). Policies SD SP2 and C SP1, support protection of the setting of settlements, and support development within settlements with potential impacts on heritage assets. Policies EMP SP2, EMP DM1, RET SP1, RET DM1, and H DM3 direct development to areas which contain a number of heritage assets, but also require respect for local character or support high quality design.
- 1.185 The majority of the remaining policies in the Plan are identified as having minor positive or negligible effects on this SA objective.
- 1.186 Overall, the Arun Local Plan is therefore considered to have a cumulative **mixed effect (minor negative and minor positive)** in relation to protecting and enhancing the historic environment although this is **uncertain** until detailed proposals for the strategic sites are known.

### SA objective 13: Maintain and enhance Arun's landscape character and quality

- 1.187 Four of the strategic residential sites (Angmering North, BEW, Ford, and Yapton), as well as Angmering South and East, will potentially have a significant negative effect on this SA objective as they are classified as being of substantial sensitivity/value with a low capacity for development (in terms of landscape) in the Landscape Capacity Study: Phase 1 (2016) and the Landscape Capacity Study: Phase 2 (2017). The effects of developing at Angmering North are due to the likely impact on the views and/or setting of the National Park. Introducing new larger scale built development at the Ford and BEW strategic sites is likely to have a significant urbanising effect altering the character of the rural landscape, and eroding the gap between existing settlements. Development at Yapton would be inconsistent with the existing settlement form.
- 1.188 In addition, both strategic employment site allocations are also expected to have a potential significant negative effect on this objective as they have a low capacity for development due to the potential impacts on the South Downs National Park (at Angmering) and from the erosion of the gap between the settlements of Bognor Regis and Shripney (at Enterprise Bognor Regis).
- 1.189 The strategic residential site at Littlehampton - West Bank is expected to have a mixed effect on this SA objective (significant negative effect combined with a minor positive effect). The significant negative effect was identified as the part of the site which will be developed for housing (i.e. West Bank) is considered to be of substantial sensitivity and of low capacity for development, while the minor positive effect is identified as the redevelopment of the site is likely to improve the overall character and appearance of the site and the surrounding landscape/ townscape.
- 1.190 In four cases, the potential for minor negative effects on the landscape were identified (Climping, Fontwell, Paghams South, and West of Bersted). The site at Paghams North is identified as having a negligible but uncertain effect as it is of slight sensitivity and value and of high capacity for development in terms of landscape.
- 1.191 The effects of all of the sites are uncertain given that the exact effect will depend on the design of the development and considering that there may be potential to mitigate these effects by having regard to the setting and form of existing settlements and the character and sensitivity of adjacent landscapes.

- 1.192 The Strategic Objectives and the policies in Chapter 7: Settlement Structure and Green Infrastructure are expected to have the most positive effects on this objective with five of the six policies in this chapter recorded as having significant positive effects (policies SD SP2, C SP1, GI SP1, LAN DM1 and LAN DM2). These policies seek to protect and enhance the countryside and green infrastructure, and direct development towards the existing built-up areas to prevent urban development intruding and affecting the character of the landscape. Policy LAN DM2 also gives specific protection to the setting of and important views relating to Arundel which has been recognised as an important gateway to the South Downs National Park. Further significant positive effects are expected in relation to Policies D DM1 (Chapter 13: Design), OSR DM1 (Chapter 14: Health, Recreation & Leisure) and QE DM2 (Chapter 21: Quality of the Environment). These policies encourage the design of new development in Arun to be respectful of the character of the District, the creation and enhancement of open space, and the protection of dark skies and/or tranquillity which contribute to the overall character of the District's landscape.
- 1.193 Policies EMP SP3 and EMP DM2 (Chapter 8: Employment & Enterprise) and policies H SP2b (SD4 - Littlehampton - West Bank) and H SP2c (SD5 - BEW, SD7 - Yapton, and SD8 - Ford) (Chapter 12: Housing Delivery) are expected to have mixed effects (significant negative but uncertain/minor positive) as they seek to allocate land which has been identified as being of substantial landscape sensitivity with low capacity for development. The minor positive effect is identified as the policies include some mitigation to offset the negative effects on the landscape such as incorporating landscaping within the strategic sites.
- 1.194 The majority of the remaining policies in the Arun Local Plan are expected to have minor positive or negligible effects on this SA objective.
- 1.195 Overall, the Arun Local Plan is therefore considered to have a cumulative **mixed effect (significant negative and minor positive)** in relation to maintaining and enhancing the landscape character and quality of the District.

**SA objective 14: Reduce the global, social and environmental impact of waste generation and consumption of resources by using sustainably produced and local products**

- 1.196 While it is recognised that the level of development proposed at the strategic sites in the Local Plan and the small sites contained in the Neighbourhood Development Plans may result in higher levels of local waste production it is expected that the location of sites is unlikely to impact upon the volume and management of waste in the District.
- 1.197 Minor negative effects are identified for eight strategic residential sites, Angmering South and East, and both strategic employment sites as they are either on greenfield land which limits the opportunity to re-use previously developed sites or materials, or they are within close proximity of the Sharp Sand and Gravel Resource Mineral Safeguarding Area (identified in the [Proposed Submission Draft Joint Minerals Local Plan](#)) which could potentially lead to sterilisation of these resources. The Littlehampton - West Bank and Ford site options incorporate elements of brownfield land and so may offer opportunities to reuse existing buildings and materials. A minor positive but uncertain effect is identified for the site at Littlehampton - West Bank while a mixed effect (uncertain minor positive/minor negative) is expected for the strategic site at Ford.
- 1.198 Chapter 20 of the Arun Local Plan directly addresses waste management in Arun. Policy WM DM1 is likely to have a significant positive effect on this SA objective as it seeks to minimise waste production in the District and supports the transfer of waste management higher up the waste hierarchy which will result in the local promotion of waste prevention, minimisation and re-use. The policy identifies how development proposals should contribute to waste management, collection and recycling and also protects existing waste management facilities. A significant positive effect is also likely in relation to Policy NR DM1 (Chapter 18 Natural Resources) as it seeks to ensure the efficient use and safeguarding of mineral resources in the District. The policy also supports the use of recycled and secondary materials in the design of new developments.
- 1.199 Further significant positive effects on this SA objective are expected in relation to policies ECC SP2 and ECC DM1 (Chapter 13 Design) which address design in relation to renewable energy and climate change in the District. Policy OSR SP1 (Chapter 14 Health & Recreation) is also expected to have a significant positive effect on this SA objective as it supports the development of sites as

allotments would help to provide a local and sustainable source of food, which in turn may help to reduce the need for food packaging and 'food miles'. The provision of additional allotment space in Arun is also expected to encourage the use of green waste as compost thereby having a further beneficial effect in terms of waste management.

- 1.200 A number of minor negative effects are identified for the strategic residential site specific policies SP2a, SP2c, EMP SP3, EMP DM2, H SP3, H SP4 and INF SP2, with mixed effects (minor positive / minor negative) identified for H SP2b, H SP2c (SD8 – Ford) EMP SP2, H SP1 and HER DM 1. These scores reflect the use of greenfield land, where a development site does not re-use existing land or materials, or supporting a use which is likely to generate increased levels of waste.
- 1.201 No significant negative effects were identified for either the policies or the site options.
- 1.202 Overall, the Arun Local Plan is therefore considered to have a cumulative **mixed effect (minor positive and minor negative)** in relation to reducing the global, social and environmental impact of waste generation and consumption of resources.

### **SA objective 15: Ensure a diverse and thriving economic base to support Arun's growth**

- 1.203 The strategic employment site allocations and the employment land at Courtwick and North Littlehampton (3.5ha) are expected to have a significant positive effect on this objective by ensuring that new job opportunities are provided to match the population growth that is being planned for within the District. Based on the assumptions used to appraise the sites, significant positive effects are also predicted for Littlehampton - West Bank and West of Bersted as both sites are within close proximity of the main employment areas and will deliver more than 700 homes, which is likely to result in the development of new school facilities on-site or nearby. Significant negative effects are expected for four of the strategic residential site allocations (Climping, Fontwell, Pagham South, and Yapton) as the sites are not within close proximity of one of the main towns in the District where employment opportunities can be accessed, and the development of the sites are unlikely to result in the provision of new school facilities which will put additional pressure on existing school places. Mixed effects (significant positive and minor negative) are identified for four sites (Angmering North, BEW, Ford, and Pagham North). Mixed effects (significant positive and significant negative) are expected for Angmering South and East as the allocation of a strategic employment site at Angmering will provide additional employment opportunities for residents. However, due to the capacity of the sites it is unlikely that their development will result in the provision of new school facilities which will put additional pressure on existing school places.
- 1.204 Policy SD SP1a (Chapter 6: Sustainable Development) is likely to have a significant positive effect as it promotes Bognor Regis and Littlehampton as the main employment centres in the District and seeks to identify existing sites of important employment use, to allocate land to meet the future needs of the district, and to support the economic development of the coastal market area. The policies in Chapter 8: Employment & Enterprise are also likely to have significant positive effects as their purpose is to stimulate sustainable economic growth, primarily in Bognor Regis, Littlehampton, and Angmering, through the provision of accessible employment opportunities particularly in the knowledge and cultural sectors.
- 1.205 The policies within Chapter 9 (Retail) and 10 (Tourism) are likely to have significant positive effects on this objective as they seek to provide employment opportunities at town centres including within the tourism and leisure sectors.
- 1.206 Policies H SP2a, H SP2b and HSP2c (SD5 - BEW, SD8 – Ford, SD9 – Angmering North, SD10 – Climping) (Chapter 12: Housing Delivery) are expected to have a significant positive effect on this objective as the policies require new school facilities to be provided as part of the development of the strategic sites at Pagham North, Pagham South, West of Bersted, Littlehampton - West Bank, BEW, Ford, Angmering North and Climping. Policy H DM3 will also have a significant positive effect as it is expected to support the continued functioning of certain industries (for example agricultural, forestry and horticultural) by providing supporting accommodation in suitable locations.
- 1.207 Policy HOR DM1 (Chapter 11: Soils, Horticulture and Equine Developments) and policy H DM3 (Chapter 12: Housing Delivery) encourage horticultural developments which support the rural economy in the District by providing local employment opportunities. Three policies within

Chapter 15: Transport (T SP1, T SP3, and T DM2) will also experience significant positive effects as the continued maintenance and improvement of the strategic and supporting road network in Arun is likely to strengthen opportunities for employment and economic growth. Policy INF SP1 (Chapter 22: Infrastructure Provision & Implementation) will have a mixed effect (significant positive/minor but uncertain negative) as the policy supports the provision of infrastructure which will support employment growth in Arun (including transport and communications infrastructure), however, it is expected that requiring new infrastructure or contributions towards such infrastructure may impact upon the viability and subsequently the delivery of some economic development in Arun. Finally, policy INF SP2 (Chapter 22: Infrastructure Provision & Implementation) will have a significant positive effect as it supports the provision of a new secondary school in the District.

- 1.208 A small number of mixed effects (minor positive / minor negative) are identified for policies LAN DM1, LAN DM2, SO DM1 and QE DM3 which seek to ensure development does not result in harm to landscape, soil and air quality. Minor negative effects are also identified for H SP2c (SD6 - Fontwell), NR DM 1 and WM DM1 where economic development may be restricted by the policy.
- 1.209 Overall, the Arun Local Plan is therefore considered to have a cumulative **mixed effect (significant positive and minor negative effect)** in relation to ensuring there is a diverse and thriving economic base to support Arun's growth.

## Mitigation and Recommendations

- 1.210 **Table 15** identifies the Local Plan policies that are expected to provide mitigation for the potential significant negative effects identified for the site allocations and other Local Plan policies. Note that only those SA objectives for which potential significant negative effects were identified have been included in the table. Nine out of the 15 SA objectives are unlikely to be negatively affected (at a significant level) by the policies or site allocations in the Arun Local Plan (SA objectives 1, 2, 3, 4, 5, 6, 9, 10 and 14).

**Table 15 Possible mitigation for potential negative effects identified**

SA objectives for which potential negative effects have been identified	Local Plan policies providing possible mitigation
<b>Environmental</b>	
7. Preserve, restore or enhance Arun's biodiversity and geodiversity	<p>Policy ENV SP1: Natural Environment promotes the conservation and enhancement of biodiversity and the natural environment.</p> <p>Policy ENV DM1: Designated sites of biodiversity or geological importance and Policy ENV DM3 Non-designated sites seeks to preserve, restore or enhance designated and non-designated biodiversity and geodiversity sites in the District.</p> <p>Policy ENV DM2: Pagham Harbour seeks to protect the integrity of the SPA/Ramsar site from development which may have an adverse effect on the site's habitats and species.</p> <p>Policy ENV DM5: Development and biodiversity seeks to achieve a net gain in biodiversity and to protect existing habitats on site.</p> <p>These policies will apply to all new development including at the allocated sites.</p>
8. Maintain and improve water quality, and maximise water efficiency measures	<p>Policy W SP1: Water and Policy W DM1: Water Supply and Quality seek to maintain and improve water quality and encourages water efficiency measures in new developments in order to protect the District's water resources and enhance the quality of the water environment.</p> <p>These policies will apply to all new development including at the allocated sites.</p>
11. Avoid the loss of Best and Most Versatile agricultural land, reduce soil degradation/ contamination, and improve efficiency in	<p>Policy QE DM4: Contaminated Land promotes the use of previously developed land and the remediation of contaminated land and Policy SO DM1: Soils seeks to protect the Best and Most Versatile agricultural land from inappropriate development.</p>

SA objectives for which potential negative effects have been identified	Local Plan policies providing possible mitigation
land use.	These policies will apply to all new development including at the allocated sites.
12. Protect and enhance the historic environment	<p>Policy HER SP1: The Historic Environment seeks to conserve or enhance the historic environment in the District.</p> <p>Policy HER DM1: Listed Buildings seeks to preserve or enhance the character, qualities or special interest of listed buildings.</p> <p>Policy HER DM2: Locally Listed Buildings or Structures of Character seeks to preserve locally important buildings and structures which make a positive contribution to local distinctiveness.</p> <p>Policy HER DM3: Conservation Areas seeks to preserve the setting and character of Conservation Areas.</p> <p>Policy HER DM4: Areas of Special Character seeks to preserve or enhance buildings or other features (e.g. boundary walls, hedges, or trees) within Areas of Special Character.</p> <p>Policy HER DM6: Sites of Archaeological Interest seeks to preserve scheduled and other nationally important monuments and archaeological remains.</p> <p>Policy LAN DM2: The setting of Arundel seeks to protect the setting of historic Arundel.</p> <p>These policies will apply to all new development including at the allocated sites.</p>
13. Maintain and enhance Arun's landscape character and quality	<p>Policy GI SP1: Green Infrastructure and development seeks to preserve and enhance the Green Infrastructure Network.</p> <p>Policy LAN DM1: Protection of landscape character seeks to conserve and enhance landscape character of the District.</p> <p>Policy SD SP3: Gaps between settlements seeks to protect the settlement structure of the District and to protect the undeveloped coastline.</p> <p>Policy D SP1: Design and Policy D DM1: Aspects of form and design quality encourage the design and layout of new developments to be appropriate to their landscape surroundings.</p> <p>These policies will apply to all new development including at the allocated sites.</p>
<b>Economic</b>	
15. Ensure a diverse and thriving economic base to support Arun's growth.	<p>The policies in the Employment and Enterprise section of the Local Plan (Policies EMP SP1 – SP3, and Policies EMP DM1 and EMP DM2) will combine to help diversify and strengthen the local economy.</p> <p>Policy SKILLS SP1: Employment and Skills seeks to raise the skill levels of the people of Arun.</p> <p>Policy TOU SP1: Sustainable tourism and the visitor economy seeks to retain and improve visitor attractions, facilities and accommodation in the District.</p> <p>These policies will apply to all new development including at the allocated sites.</p>

## Recommendations

- 1.211 A number of recommendations were identified in the SA of the Main Modifications to the Arun Local Plan through the detailed appraisal of policies and site allocations described in Chapters 4-6. The recommendations have been set out in Error! Reference source not found. and **Table 17**.

**Table 16 Recommendations**

Recommendation made in the SA of the Main Modifications to the Arun Local Plan and provided to ADC in February 2017	ADC's response in February 2017	Change made in response to the recommendation
<p>Policy EMP DM2: Enterprise Bognor Regis and Policy EMP SP3: Strategic Employment Land Allocations or supporting text could be reworded to include reference to protecting the historic environment. The policies or supporting text could also require development proposals to have regard to the setting and form of existing settlements and the character and sensitivity of adjacent landscapes.</p>	<p>Arun District Council's response 22<sup>nd</sup> Feb 2017: ADC appreciate that the SA has highlighted that due to the proximity of the conservation area to this strategic employment site that the heritage implications would need to be considered with any employment development. However it would not be appropriate to amend the employment policy as the matter of the effect of any development (employment or otherwise) would more correctly be considered by the specific heritage policies in the rest of the plan.</p>	<p>None.</p>
<p>Policies H SP2a, H SP2b and H SP2c should be updated to include the recommendations outlined in the HRA which requires planning applications for five strategic residential sites to be supported by overwintering bird surveys and impact assessments, with mitigation measures to include adjustments to the form, scale and layout of the development and/or enhancement of alternative areas of supporting habitat nearby (e.g. through a conservation land management agreement). The policy or the supporting text could also be updated to include reference to strategic site proposals which will contribute to the expansion of existing schools. The policy or supporting text could also require development proposals to have regard to the setting and form of existing settlements and the character and sensitivity of adjacent landscapes.</p>	<p>Arun District Council's response 22<sup>nd</sup> Feb 2017: ADC appreciate that the SA has highlighted that due to the proximity of the Pagham Harbour SPA /Ramsar area to this strategic housing site its impacts would need to be considered. The Pagham Strategic policy in the introduction raises this issue and requires that the design of the site takes the Pagham SPA into account in its design. However it would not be appropriate to address all of the biodiversity issues in this policy which is specifically about key design and infrastructure issues that need to be addressed when developing this strategic housing site. These more detailed matters would more correctly be considered by the relevant specific DM policies in the rest of the plan that would be applied when considering a planning application. It should be noted also that the requirement to do surveys is a method rather than a policy so would be too detailed to be in a policy. Paragraph 192 of the NPPF put the onus on developers to find out what information is needed.</p>	<p>Policy H SP2a was updated in the Table of further Main Modifications (November 2017) to ensure no detrimental impact to Pagham Harbour SPA, through compliance with ENV DM2 (Pagham Harbour) and its supporting text.</p> <p>The supporting text of the Pagham Harbour policy has also been updated to <i>"ensure no detrimental impacts through the loss of supporting habitat, development within close proximity to the boundary of Buffer Zone A for Pagham Harbour SPA, will need to prove the site is not used regularly by birds. To do this information on the cropping regime, frequency of planting favoured by Brent Geese, sources of disturbance, openness of the site and at least one seasons wintering surveys will need to be provided. Where results show frequent use, an additional winter bird survey should be carried out and mitigation design aspects incorporated, to enable informed judgments to be made"</i>.</p>
<p>Policy W DM1: Water Supply and Quality should be updated to include the recommendations outlined in the HRA which states that flows from residential developments which exceed the available headroom at Pagham Wastewater Treatment Works to be transferred to alternative discharge locations. Policy H SP2a could also be updated to incorporate this statement. This is</p>	<p>Arun District Council's response 22<sup>nd</sup> Feb 2017: The drainage solution and requirements for resolving the waste water discharge is a matter to be resolved by the infrastructure provider and the developer. However, quite rightly the HRA and SA identify the importance of this issue. ADC has explained the waste water</p>	<p>None.</p>

Recommendation made in the SA of the Main Modifications to the Arun Local Plan and provided to ADC in February 2017	ADC's response in February 2017	Change made in response to the recommendation
<p>to ensure that implementation of the plan does not result in likely significant effects on Pagham Harbour SPA.</p> <p>Policy H SP2a (SD1 – Pagham South) should also be updated in line with the Infrastructure Delivery Plan recommendation that a provision requiring adequate separation between the Pagham WWTW and sensitive receptors such as residential dwellings and recreational areas is included in the site specific policy.</p>	<p>constraints in the supporting text and the need to resolve this issue.</p>	

1.212 A number of minor wording changes to the policies were also recommended throughout the SA process:

**Table 17 Minor Recommendations**

Recommendation made in the SA of the Main Modifications to the Arun Local Plan and provided to ADC in February 2017	Change made in response to the recommendation
<b>Chapter 8</b>	
<p>Policy EMP DM2 or the supporting text could refer to the possible issues with design/construction of flood compensation areas associated with the Bognor Regis Enterprise site and require further investigation. Furthermore, the policy could refer to the findings of the Sequential and Exception Test which recommends that groundwater monitoring is undertaken at the earliest opportunity to establish areas of the site at greatest risk.</p>	<p>None. Arun District Council's response 22<sup>nd</sup> Feb 2017: This is covered in a specific DM policy about flooding. No change is needed.</p>
<b>Chapter 12</b>	
<p>The wording in relation to the protection of heritage assets could be updated to read: "Conserve and, where appropriate, enhance heritage assets and historic character".</p>	<p>Updated in the Main Modifications to the Arun Local Plan.</p>
<p>The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment has been updated in May 2015. Policy H SP5 should be updated to reflect the revised pitch requirements (see the Housing Implementation Strategy).</p>	<p>Addressed in the Main Modifications to the Arun Local Plan.</p>
<p>The Code for Sustainable Homes was revoked in 2015. Policy AH SP2 should be updated to reflect this change.</p>	<p>Updated in the Main Modifications to the Arun Local Plan.</p>
<b>Chapter 13</b>	
<p>The criteria in Policy D SP1 which development proposals must consider should include reference to sustainable transport, water quality and efficiency, flood risk, and the use of local and sustainable materials.</p>	<p>None. Arun District Council's response 22<sup>nd</sup> Feb 2017: Addressed through additional criteria which requires developments to comply with the Arun District Council Design Guide.</p>
<p>Reference should be made in Policy D DM1 to incorporate measures to mitigate the effects of climate change (e.g. flood risk), to respect and enhance the character and setting of heritage assets, and to encourage the use of local/sustainably sourced and reclaimed/recycled materials during construction and renovation.</p>	
<p>Reference should be made in Policy ECC DM1 to</p>	

Recommendation made in the SA of the Main Modifications to the Arun Local Plan and provided to ADC in February 2017	Change made in response to the recommendation
require proposals for renewable energy development to consider potential impacts on the transport network, and water and soil environments.	
Remove reference to CABE (abolished in 2011) and refer to Design Council CABE instead in Chapter 13.	Updated in the Main Modifications to the Arun Local Plan.
<b>Chapter 14</b>	
Reference to Health Impact Assessments as a requirement of EIA could be made in the policies contained in Chapter 14 where proposals are likely to have a significant impact on the health and well-being of the local communities, or particular groups within it, in order to identify measures to maximise the health benefits of the development and avoid any potential adverse impacts.	None. Arun District Council's response 22 <sup>nd</sup> Feb 2017: The policies refer to health so there is no need to separate mental health as the wording encompasses all aspects of physical and mental health.
Reference could also be made in Chapter 14 to mental as well as physical wellbeing which can also be improved by engaging in physical activity. This is to help ensure that application of the policies in this chapter does not focus solely on physical wellbeing, contrary to the intentions of the Council.	
<b>Chapter 17</b>	
Amend wording in Policy ENV SP1 to refer to the preservation, restoration and enhancement of biodiversity rather than the conservation and enhancement of biodiversity.	Addressed in the Main Modifications to the Arun Local Plan.
Reference should be made to the Arun Valley SPA Functionally Connected Land in the supporting text for Policy ENV DM1.	Addressed in the Main Modifications to the Arun Local Plan.
<b>Chapter 18</b>	
Remove reference throughout the Local Plan to Sustainable Urban Drainage Systems as these are more commonly referred to as Sustainable Drainage Systems (SuDS). The use of the word 'urban' is omitted but the meaning is the same.	Updated in the Main Modifications to the Arun Local Plan.

## Monitoring

- 1.213 **Table 18** sets out a number of suggested indicators for monitoring the potential significant (positive and negative) sustainability effects of implementing the Arun Local Plan. Note that the indicators proposed are included as suggestions and some have been drawn from the indicators proposed in the Publication Version of the Arun Local Plan 2011-2031 (October 2014).

**Table 18 Proposed Monitoring Framework for the Arun Local Plan**

SA objectives for which potential significant effects have been identified	Proposed monitoring indicators
<b>Social</b>	
1. Achieve successful and inclusive communities.	<ul style="list-style-type: none"> <li>Percentage of working age population claiming key benefits.</li> <li>No. of crimes by type recorded per 1000 population.</li> </ul>
2. Improve the health and wellbeing of the population and reduce inequalities in health	<ul style="list-style-type: none"> <li>Life expectancy.</li> <li>Number of new healthcare facilities provided.</li> <li>Infant mortality rates.</li> </ul>

SA objectives for which potential significant effects have been identified	Proposed monitoring indicators
	<ul style="list-style-type: none"> <li>• Obesity rates.</li> <li>• Number of people living with a disability.</li> <li>• Percentage of the District's population having access to a natural greenspace within 400 metres of their home.</li> <li>• Length of greenways constructed.</li> <li>• Hectares of accessible open space per 1000 population.</li> <li>• Area of open space lost to development.</li> <li>• Number of sites with Green Flag status.</li> <li>• Area of new open space delivered through development.</li> <li>• Percentage of people regularly participating in sport.</li> <li>• Number of noise pollution incidents reports annually.</li> <li>• Number of planning applications refused for noise reasons.</li> </ul>
3. Ensure the delivery of high quality, sustainably constructed, and affordable homes	<ul style="list-style-type: none"> <li>• Number of net additional residential units.</li> <li>• Gross affordable housing completions split by affordable rent, social rented and intermediate.</li> <li>• Annual housing completions – total houses built, types, sizes and tenures.</li> </ul>
4. Ensure that Arun provides excellent social infrastructure	<ul style="list-style-type: none"> <li>• Number of granted planning applications for retail, leisure, cultural or community purposes in each settlement.</li> </ul>
5. Improve the vibrancy of Arun's town centres.	<ul style="list-style-type: none"> <li>• Number of granted planning applications for retail, employment, leisure, cultural or community purposes in Littlehampton and Bognor Regis.</li> </ul>
6. Ensure efficient and sustainable movement within and beyond Arun.	<ul style="list-style-type: none"> <li>• Percentage of people who travel to work by public transport.</li> <li>• Railway stations footfall.</li> <li>• Bus patronage levels.</li> <li>• Number of Travel Plans implemented with new development.</li> <li>• Number of users of cycle paths.</li> </ul>
<b>Environmental</b>	
7. Preserve, restore or enhance Arun's biodiversity and geodiversity.	<ul style="list-style-type: none"> <li>• Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.</li> <li>• Percentage of developments generating overall biodiversity enhancement.</li> <li>• Hectares of biodiversity habitat delivered through strategic site allocations.</li> <li>• Number and extent of designated sites.</li> <li>• Change in areas and populations of biodiversity importance, including (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional significance (changes arising from development, management and planning agreements, in hectares and numbers of priority species type).</li> </ul>

SA objectives for which potential significant effects have been identified	Proposed monitoring indicators
8. Maintain and improve water quality, and maximise water efficiency measures	<ul style="list-style-type: none"> <li>• Number of water bodies within the District that are of high, good, moderate, poor or bad chemical or ecological status.</li> <li>• Number of planning applications granted contrary to the Environment Agency's advice on water quality.</li> <li>• Number of Surface Water Management Plans produced.</li> <li>• Rate of water consumption in the District.</li> <li>• Number of Source Protection Areas within the District.</li> </ul>
9. Reduce flood risk.	<ul style="list-style-type: none"> <li>• Number of planning applications granted contrary to the Environment Agency's advice on flood risk.</li> <li>• Number of properties within Flood Zones 2 and 3.</li> <li>• Number of new developments incorporating SuDS.</li> </ul>
10. Reduce air pollution.	<ul style="list-style-type: none"> <li>• Number of Air Quality Management Areas declared.</li> <li>• Number of planning applications refused for air quality reasons.</li> </ul>
11. Avoid the loss of Best and Most Versatile agricultural land, reduce soil degradation/ contamination, and improve efficiency in land use.	<ul style="list-style-type: none"> <li>• Percentage of new development taking place on brownfield/previously developed land.</li> <li>• Amount of development that takes place on best and most versatile agricultural land.</li> <li>• Area of contaminated land remediated.</li> </ul>
12. Protect and enhance the historic environment.	<ul style="list-style-type: none"> <li>• Number of entries on the Heritage at Risk Register</li> <li>• Number of buildings or structures removed or added to district-wide list of Buildings or Structures of Character</li> <li>• Number of up-to-date Conservation Area Appraisals and Conservation Area Management Plans</li> <li>• Number of planning applications approved contrary to advice from Historic England.</li> </ul>
13. Maintain and enhance Arun's landscape character and quality.	<ul style="list-style-type: none"> <li>• Percentage of development taking place on brownfield/previously developed land</li> <li>• Number of planning applications granted permission contrary to statutory consultee's advice on landscape impacts.</li> </ul>
14. Reduce the global, social and environmental impact of waste generation and consumption of resources by using sustainably produced and local products.	<ul style="list-style-type: none"> <li>• Percentage of development taking place on brownfield/previously developed land</li> <li>• Number of planning applications approved within a Mineral Consultation Area</li> <li>• Number of schemes incorporating climate change adaptation measures.</li> <li>• Amount of renewable energy generation by installed capacity and type.</li> <li>• Percentage of municipal waste landfilled.</li> <li>• Percentage of household waste sent for reuse, recycling and composting.</li> </ul>
<b>Economic</b>	
15. Ensure a diverse and thriving economic base to support Arun's growth.	<ul style="list-style-type: none"> <li>• Area of additional employment floor space – by type (B1, B2 and B8).</li> <li>• Area of employment land lost to residential development.</li> <li>• Area of floorspace/change of use for tourism facilities.</li> <li>• Qualifications of the working age population.</li> <li>• Number of new education and/or training facilities</li> </ul>

SA objectives for which potential significant effects have been identified	Proposed monitoring indicators
	<p>permitted.</p> <ul style="list-style-type: none"> <li>• Unemployment rate as a percentage of the national unemployment rate.</li> <li>• Number of business start-ups and closures.</li> </ul>

## Conclusions

1.214 The vision, strategic objectives, policies and site allocations in the Arun Local Plan have been subject to a detailed appraisal against the revised SA objectives which were developed at the Scoping stage of this updated SA process. The Arun Local Plan proposes housing and employment development across Arun to meet the future needs of the District. Therefore, the SA has identified the potential for negative effects on many of the environmental objectives, however, the Arun Local Plan also includes a wide range of development management style policies that aim to protect and enhance the economic, social and environmental conditions of the District. The majority of these policies provide appropriate mitigation, seeking to address the potential negative effects of the overall scale of development proposed. However, significant negative effects are recorded for policies EMP SP3, EMP DM2, H SP2a, H SP2b, H SP2c and W DM1 as the policies in the Modified Arun Local Plan January 2018 Consultation (December 2017) do not include mitigation measures to avoid, reduce or offset the negative effects identified for SA objectives 7: Biodiversity, 8: Water Quality, 11: Soil, 12: Historic Environment and 13: Landscape.

### Next Steps

- 1.215 This SA Report will be available for consultation alongside the further Main Modifications to the Arun Local Plan from January/February 2018 for a six week period.
- 1.216 Following this consultation, the responses will be reviewed and addressed as appropriate. The findings of the SA and the outcomes of the consultation will be taken into account by the Council as it prepares the finalised version of the Arun Local Plan.

LUC  
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