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## Arun Local Plan 2011-2031

### Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) Post Adoption Statement

Final Report  
Prepared by LUC  
July 2018

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# 1 Introduction

## Introduction

- 1.1 Arun District Council adopted the Arun Local Plan 2011-2031 on 18<sup>th</sup> July 2018.
- 1.2 During the preparation of the Local Plan, Arun District Council (ADC) was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Although SA and SEA are separate processes they have similar aims and objectives. SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations extending to social and economic impacts. Both the SA and SEA requirements were met through a single integrated process (referred to as 'SA' throughout the SA reports and this Adoption Statement which should be taken to refer to 'SA incorporating the requirements of SEA'). The method and findings of the SA were described in a number of SA reports published alongside the different versions of the Local Plan during its development.
- 1.3 Regulation 26 of the Town and County Planning (Local Planning) (England) Regulations 2012<sup>1</sup> requires ADC to make the final SA Report available alongside the adopted Local Plan. The final SA Report for the adopted Local Plan is the [SA of the further Main Modifications to the Arun Local Plan 2011-2031](#) (January 2018). This report meets the requirements of an Environmental Report in accordance with the SEA Directive<sup>2</sup>, transposed in the UK by the SEA Regulations<sup>3</sup>, and reflects the Local Plan that was submitted to the Secretary of State for examination in January 2015, whilst also incorporating the Main Modifications to the Local Plan that were consulted on from 10<sup>th</sup> April 2017 to 30<sup>th</sup> May 2017, and the further Main Modifications to the Local Plan that were consulted on from 12<sup>th</sup> January 2018 to 23<sup>rd</sup> February 2018. The Inspector considered the consultation responses received in early 2018 and some further amendments to the detailed wording of the further Main Modifications were proposed<sup>4</sup> (from March-May 2018). The Inspector's Report states that, subject to the modifications being made, the Plan is sound, it satisfies the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004<sup>5</sup> and it provides an appropriate basis for the planning of the District. The Inspector's Report also states that none of the amendments significantly alter the content of the modifications as published for consultation or undermine the participatory processes and Sustainability Appraisal that have been undertaken. LUC reviewed the further amendments to check the validity of this statement and concluded that their inclusion in the Local Plan will not result in any changes to the previously identified SA findings.

## Sustainability Appraisal and Strategic Environmental Assessment of the Arun Local Plan

- 1.4 The SA (incorporating SEA) of the Arun Local Plan began in 2005 and was undertaken initially by ADC and consultants (EDAW/AECOM). LUC was appointed in June 2016 to undertake the SA of the Main Modifications to the Arun Local Plan, the SA of the further Main Modifications to the Arun Local Plan and this SA Adoption Statement.
- 1.5 It should be noted that the Local Plan was originally prepared as a Core Strategy, as part of the Local Development Framework. However, with the introduction of the Localism Act (2011) and the revocation of Regional Spatial Strategies (locally, the South East Plan), the Council decided to

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<sup>1</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012. Statutory Instrument 2012, No. 767.

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

<sup>3</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Statutory Instrument 2004, No. 1633.

<sup>4</sup> The Planning Inspectorate, 2018. Report on the Examination of the Arun Local Plan.

<sup>5</sup> Planning and Compulsory Purchase Act 2004 (2004 c.5)

produce a new Local Plan. Therefore, the SA Reports prepared from 2005 to 2009 relate to the preparation of the Core Strategy while the SA Reports prepared subsequent to this relate to the development of the Local Plan:

- [Sustainability Appraisal Scoping Report for The Core Strategy Issues and Options](#) (2005, Arun District Council).
- [Sustainability Appraisal Scoping Report for Arun District Council Core Strategy](#) (2009, AECOM).
- [Interim Sustainability Appraisal Report](#) (2012, Arun District Council)
- [Intended Sustainability Appraisal of the Publication Version of the Local Plan](#) (2013, Arun District Council).
- [Sustainability Appraisal of the Publication Version of the Local Plan](#) (2014, Arun District Council).
- [Sustainability Appraisal Scoping Statement for the Arun Local Plan](#) (2016, LUC).
- [Sustainability Appraisal of the Main Modifications to the Arun Local Plan](#) (2017, LUC).
- [Sustainability Appraisal of the further Main Modifications to the Arun Local Plan](#) (2018, LUC).

### Correction

- 1.6 As stated above, the amendments made to the further Main Modifications (March-May 2018) do not alter the results of the SA of the further Main Modifications (January 2018). However, the assessment score for objective **15: Economy** for the Angmering Employment Site was incorrectly identified as a significant positive effect in the further Main Modifications and should have been identified as a minor positive effect due to the reduction in site size (from 8ha to 3ha).

## Requirement for the Adoption Statement

- 1.7 In addition to the requirement in Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for publishing the final SA Report alongside the adopted Local Plan, the SEA Regulations also require a number of steps to be taken upon adoption of a local plan. Specifically, Regulation 16 sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA adoption statement', and inform the public and consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency. The SEA adoption statement must explain:
- How environmental (and sustainability) considerations have been integrated into the plan.
  - How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
  - How the opinions expressed by the public, consultation bodies and, where appropriate, other European Member States, during consultation on the plan and Environmental/SA Report have been taken into account.
  - The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
  - The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan.

## Structure of the Adoption Statement

- 1.8 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Arun Local Plan 2011-2031. The document is structured according to the SEA Regulation requirements listed in the preceding paragraph.
- **Section 2** summarises how environmental considerations have been integrated into the plan by explaining who carried out the SA/SEA and what assessment framework was used.
  - **Section 3** summarises the links between the plan making and SA/SEA processes and how the SA/SEA recommendations were taken into account.
  - **Section 4** summarises the consultation opinions provided on the SA/SEA at each stage and describes what changes were made to the SA/SEA process in response to these comments.
  - **Section 5** describes the alternatives/options considered as part of the Local Plan preparation process and why certain options were chosen.
  - **Section 6** describes how the significant sustainability/environmental impacts of the Local Plan will be monitored.

## 2 How environmental and sustainability considerations have been integrated into the Local Plan

### Introduction

- 2.1 The purpose of the SA (incorporating SEA) of the Arun Local Plan was to assist ADC in preparing the Local Plan by identifying the key sustainability/environmental issues facing the plan area, predicting what would be the likely effects of the Local Plan on these issues, and to put forward recommendations to improve the Local Plan. The aim was to ensure that the Local Plan has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible when the policies are implemented and result in new development within Arun.
- 2.2 The SA was undertaken iteratively, such that at each stage of the Local Plan's development an assessment of the sustainability and environmental effects of the options for the Local Plan and subsequently its sites and policies was made. SA Reports were produced to describe the approach taken, to identify the effects and put forward recommendations to avoid or minimise negative effects identified or enhance positive effects. In this way, environmental and sustainability considerations were integrated into the Local Plan as it was developed.

### SA Framework

- 2.3 The way in which the environmental and sustainability effects of the Local Plan were described, analysed and compared was through the use of a set of SA objectives. The SA objectives for the Local Plan were developed by ADC in collaboration with stakeholders, drawing on a review of baseline information, relevant plans, policies and programmes, and key sustainability issues in the District. The resulting SA Framework was presented in the Sustainability Appraisal Scoping Report for The Core Strategy Issues and Options (2005). In 2008, ADC commissioned EDAW/AECOM to update the context and baseline information; the relevant plans, policies and programmes; the key sustainability issues; and, to undertake a review of the previous SA Framework. The review concluded that the SA Framework was too generic and a new SA Framework was needed to assess the subsequent stages of the Local Plan to ensure that the most sustainable options for further development in Arun are taken forward. A draft Scoping Report was issued for consultation from 21<sup>st</sup> November 2008 to 9<sup>th</sup> January 2009.
- 2.4 A new SA Framework was developed and presented in the Sustainability Appraisal Scoping Report for Arun District Council Core Strategy (2008) which comprised seven headline objectives and 51 sub-objectives covering all of the SEA topics specifically required by the SEA Regulations. The SA Framework developed as part of the 2008 Scoping Report was used as the basis for assessing the Core Strategy Options for Growth (2009), the Arun Consultation Draft Local Plan 2013-2028 (2012), the Proposed Version of the Arun Local Plan (2013) and the Publication Version of the Arun Local Plan (2014). The Arun Local Plan and its associated 2014 SA Report were submitted to the Government for examination in January 2015.
- 2.5 In July 2015, the Inspector's preliminary Examination in Public (EiP) findings in relation to SA suggested that a new, clear and simplified SA Report should be prepared which clearly presents the audit-trail of decision making (i.e. the reasons for selecting reasonable alternatives, preferred alternatives, and discounting alternatives) and a simplified SA Framework. The Inspector formally suspended the EiP in February 2016 for 15 months. During the suspension of the EiP process, LUC reviewed the SA of the Publication Version of the Arun Local Plan (2014) and revised and simplified the SA Framework for the Main Modifications and further Main Modifications of the Arun

Local Plan, increasing the total number of SA headline objectives from seven to 15. The objectives were re-ordered to ensure that the headline objectives provided a clear and focused appraisal of each policy or proposal in the Arun Local Plan. The review of the SA objectives sought to avoid duplication and any single SA objective covering too many issues. The SA headline objectives were organised into three distinct groups covering social, environmental and economic issues. The number of sub-objectives was reduced from 51 to 40. Finally, the wording of some of the objectives in the SA Framework was revised since the Scoping Statement (2016) to take into account the suggestions of the statutory consultees.

- 2.6 Due to the risk of inconsistencies between the work undertaken in the previous SAs and the assessment of sites and policies for the Main Modifications and further Main Modifications of the Arun Local Plan, a reassessment of the 12 strategic sites and policies considered in the 2014 SA Report was undertaken against the revised SA Framework. This approach ensured that a robust and consistent assessment of all reasonable options had been undertaken.
- 2.7 The final SA Framework for the Local Plan is presented in **Table 2.1**. The final column shows how the SEA topics (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were covered by at least one of the SA objectives.

**Table 2.1 SA Framework and monitoring indicators for the Arun Local Plan**

Headline SA Objective	Sub-objectives	Monitoring indicators	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>	<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>	<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 pollution?</p>	<ul style="list-style-type: none"> <li>Life expectancy.</li> <li>Number of new healthcare facilities provided.</li> <li>Infant mortality rates.</li> <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</li> </ul>	<p>Population</p> <p>Human health</p>

Headline SA Objective	Sub-objectives	Monitoring indicators	SEA Topics covered by SA Objective
		<p>delivered through development.</p> <ul style="list-style-type: none"> <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.	<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>	<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>	Population Human health
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>	<ul style="list-style-type: none"> <li>Number of granted planning applications for retail, leisure, cultural or community purposes in each settlement.</li> </ul>	Population Human health
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>	<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>	Population Human health
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>	<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>	Human Health Air Climatic factors
<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</p>	<ul style="list-style-type: none"> <li>Number of planning approvals that generated any adverse impacts on sites of acknowledged</li> </ul>	Biodiversity Flora Fauna

Headline SA Objective	Sub-objectives	Monitoring indicators	SEA Topics covered by SA Objective
	<p>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 importance.</p> <ul style="list-style-type: none"> <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>	
<p>8. Maintain and improve water quality, and maximise water efficiency measures.</p>	<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>	<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>	<p>Water</p> <p>Climatic factors</p>
<p>9. Reduce flood risk.</p>	<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>	<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</li> </ul>	<p>Water</p> <p>Soil</p> <p>Climatic factors</p> <p>Human health</p>

Headline SA Objective	Sub-objectives	Monitoring indicators	SEA Topics covered by SA Objective
		incorporating SuDS.	
10. Reduce air pollution.	Will the option, policy or site improve air quality?	<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>	Air Climatic factors Human health
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>	<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>	Soil Climatic factors
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>	<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>	Cultural heritage, including architectural and archaeological heritage
13. Maintain and enhance Arun's landscape character and quality.	Will the option, policy or site protect, enhance, and restore the distinctive character of Arun's settlements, built environment and, landscapes?	<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>	Landscape
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>	<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> </ul>	Soil Climatic factors Material assets

Headline SA Objective	Sub-objectives	Monitoring indicators	SEA Topics covered by SA Objective
	Will the option, policy or site reduce carbon emissions from energy?	<ul style="list-style-type: none"> <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.	<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>	<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 permitted.</li> <li>Unemployment rate as a percentage of the national unemployment rate.</li> <li>Number of business start-ups and closures.</li> </ul>	Population Human health Material assets

2.8 In addition to the use of the SA Framework to assess the potential effects of the Local Plan site options and policies as they were drafted, environmental and sustainability considerations were integrated into the Local Plan through close working between initially EDAW/AECOM and then LUC and ADC officers drafting the Local Plan. EDAW/AECOM and LUC each worked with ADC officers to discuss and agree the scope of, and approach to, the SA throughout the development of the Local Plan. Draft sections of the Main Modifications and further Main Modifications to the Arun Local Plan, including draft policies and potential site allocations, were sent to LUC for appraisal and the SA team discussed the likely sustainability implications of the emerging plan during the process of carrying out the SA and plan making.

## Habitats Regulations Assessment

2.9 The Local Plan was subject to a Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species (Amendment) Regulations 2012<sup>6</sup>. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Arun Local Plan was undertaken separately from the SA by Urban Edge Environmental Consulting. The findings of the HRA Reports informed the SA process, particularly

<sup>6</sup> Conservation of Habitats and Species (Amendment) Regulations 2012. Statutory Instrument 2012 No. 1927.

in relation to judging the potential effects of the Local Plan against SA objectives **7: Biodiversity and Geodiversity** and **8: Water Quality**.

- 2.10 The [HRA for the Arun Local Plan: Supplementary Work](#) (2017) determined that, although two committed strategic housing/employment developments (land at Courtwick Lane, Littlehampton, and land north of Toddington Lane, Littlehampton) and two strategic housing sites (Ford [SD8] and LEGA [SD4]) contain land within the Arun Valley Functionally Connected Land Impact Risk Zone 2, the development of these allocations will have a relatively low risk to the winter survival rate of the Arun Valley SPA population (Bewick swan, wigeon, teal, pintail, shoveler or ruff). With respect to Pagham Harbour SPA/Ramsar, the HRA determined that the strategic allocations (Pagham North [SD1]; Pagham South [SD2] and West of Bersted [SD3]) are unlikely to result in the direct loss of supporting habitat and would not therefore threaten the integrity of the SPA/Ramsar. However, the HRA recommended that policies H SP2a, H SP2b and H SP2c are updated to require planning applications for five strategic sites (SD1, SD2, SD3, SD4, SD8) to be supported by overwintering bird surveys to establish the level of use by qualifying species together with an assessment of site suitability for qualifying species. Subsequent impact assessments should also be undertaken to ascertain whether the proposals would result in adverse effects through loss of, displacement from, supporting habitats within and adjacent to the allocations, to enable suitable mitigation strategies to be devised if necessary. Policy H SP2a was updated to include this recommendation in the further Main Modifications to the Arun Local Plan.
- 2.11 The HRA also stated 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. The HRA recommended that flows from residential developments which exceed the available headroom at Pagham Wastewater Treatment Works be transferred to alternative discharge locations. The HRA stated 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. ADC's response to this recommendation made in the HRA and the SA is that the drainage solution and requirements for resolving the waste water discharge is a matter to be resolved between the infrastructure provider and the developer. Furthermore, ADC stated that the supporting text of *W DM1: Water Supply and Quality* and a new sub-section inserted in Infrastructure Provision & Implementation explains the waste water constraints and the need to resolve this issue in order to deal with the issues raised within both the HRA and SA. The Appropriate Assessment Addendum (December 2017) concluded 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 Main Modifications consultation stage.

### 3 How the Environmental/SA Report has been taken into account

- 3.1 As stated in the previous section, the SA was undertaken iteratively, such that an assessment of the sustainability and environmental effects was made at each stage of the Local Plan's development. SA Reports were produced to describe the approach taken, the potential effects identified and put forward recommendations to avoid or minimise negative effects or enhance positive effects. ADC officers preparing the Local Plan took the SA findings and recommendations into account while making changes to the Plan before each round of public consultation.
- 3.2 **Table 3.1** overleaf shows how preparation of the SA Reports (including the Environmental Report requirements) corresponded with each stage of the Local Plan preparation, and how any recommendations made were taken into account. For the SA Reports of the Main Modification and further Main Modifications, drafts of the SA Reports were provided to ADC prior to the Local Plan documents being finalised for consultation.

**Table 3.1 Stages of Local Plan preparation and corresponding SA stages plus how the SA Reports have been taken into account**

Time period	Plan-making stage	Accompanying SA work	How SA Report was taken into account
2005-2008	Evidence Gathering <i>Core Strategy Issues and Options (2005)</i> <i>Core Strategy (2008)</i>	Scoping Report for the Core Strategy Issues and Options (2005) Scoping Report of the Core Strategy (2008)	The scoping stage of the SA involved compiling information about the social, economic and environmental baseline for the plan area as well as the policy context and key sustainability issues. The SA Framework was developed, setting out the SA objectives against which plan options and policies would be appraised.  The primary purpose of a Scoping Report is to set the scope and objectives for the SA and therefore it has a limited role in influencing the Local Plan itself.
2008-2009	Issues and Options <i>Core Strategy Options for Growth (2009)</i>	Initial Sustainability Commentary on the Core Strategy Options for Growth (2009)	This SA Report appraised three spatial options for growth encompassing 20 potential locations for development across the District. A total of ten possible locations were identified for extension to the coastal towns (Option 1) <sup>7</sup> , a further nine for the expansion of inland settlements (Option 3) <sup>8</sup> , with Ford as a possible location for a new settlement (Option 2). Following an initial assessment, 14 locations were considered unsuitable for large scale strategic development. Six potential development locations were carried forward for more detailed analysis <sup>9</sup> .  The SA concluded that Option 1 was the most sustainable providing positive results especially in relation to the social elements of the assessment. This was taken into account by ADC and helped to inform the approach that was then taken forward to spread the distribution of growth between the coastal towns and the inland villages.
2009-2012	Draft Local Plan <i>Arun Consultation Draft Local Plan 2013-2028 (2012)</i>	Interim SA of the Arun Consultation Draft Local Plan 2013-2028 (2012)	The SA Report appraised the policies and site options proposed in the Arun Consultation Draft Local Plan and recommended a number of minor amendments to policies (included in chapter 8 of the SA Report) which were taken into account in the next iteration of the plan.
2013-2016	Publication Version Local Plan <i>Publication Version of the Arun Local Plan (2013)</i> <i>Publication Version of the Arun Local Plan (2014)</i>	Intended SA of the Publication Version of the Arun Local Plan (2013) SA of the Publication Version of the Arun Local Plan (2014)	The SA appraised 12 strategic sites at various growth levels and concluded that Pagham, Arundel, Rustington, Yapton/Climping, and Walberton were the least sustainable options and should not be considered for inclusion as strategic sites in the Local Plan. It also identified that the most sustainable location, in the short-term, is Angmering. In the medium/long-term, Barham/Eastergate/Westergate was identified as the most sustainable bringing wide reaching benefits to the District. Littlehampton, West Bank provided the greatest benefits contributing to all the sustainability objectives in the longer-term.  The SA appraised three alternatives for the distribution of employment land in the District and concluded that Alternative 1 was the most sustainable as it disperses employment land provision to different areas in the District with sustainable transport links. This approach was taken forward in the Local Plan.

<sup>7</sup> In the Bognor Regis area – South Pagham, North Pagham, North-west of Chalcraft Lane, West of Felpham, North of Middleton.

In the Littlehampton area – West Bank, North Littlehampton (Courtwick), North Littlehampton (Toddington Nurseries), North of Rustington, Ferring.

<sup>8</sup> In the West of the District – Barham/Eastergate/Westergate Area, Arundel, Fontwell, Walberton, Yapton, Climping/Horsemere Green.

In the East of the District – Angmering (East and South), Angmering (North), Findon.

<sup>9</sup> They included three potential development locations on the edge of the coastal towns (North-west of Chalcraft Lane, North Littlehampton [Toddington Nurseries], North Littlehampton [Courtwick]), Ford, and two locations for major expansion of inland villages (Barnham/Eastergate/Westergate Area, Angmering [East and South]).

Time period	Plan-making stage	Accompanying SA work	How SA Report was taken into account
			<p>The SA appraised three alternatives for the policy relating to settlement structure and green infrastructure and concluded that a new policy should be introduced to replace the Green Infrastructure Corridor policy. Policy SD SP3 Gaps between Settlements was included in the Local Plan.</p> <p>The SA assessed three alternatives for the transport policy and concluded that all three alternatives should be included in the Local Plan as they will all be delivered alongside strategic development proposed in the plan as part of a mitigation and development facilitation package. This approach was taken forward in the Local Plan.</p> <p>Three alternatives were considered for the policy relating to infrastructure provision and implementation and the SA identified that Alternative 3 was the most sustainable. This approach was taken forward in the Local Plan.</p>
2016	Evidence Gathering (following initial Examination/Hearings)	SA Scoping Statement (2016)	A review of the previous SA Reports was undertaken in June 2016 which resulted in a number of amendments being proposed in order to ensure that the consultation comments and the Inspector's concerns were addressed, including refining the SA Framework and summarising for each option being considered as part of the preparation of the Local Plan the reasons for selecting the alternatives considered; the main SA findings for each alternative; and the reasons for selecting the preferred alternatives and discounting other alternatives. This approach was adopted in the subsequent SA Reports.
2016-2017	Modifications <i>Publication Version showing Modifications (2017)</i>	SA of the Main Modifications to the Arun Local Plan (2017)	<p>The SA identified significant environmental constraints for some of the initial 13 strategic residential sites. This resulted in site boundaries being revised to exclude the significant environmental constraints. The Council discounted the strategic sites at North Middleton and Ferring East based on the findings of the SA and the Landscape Study. ADC also discounted two additional sites at Bognor Regis Golf Club and Baird's Family Land West of Littlehampton due to the multiple constraints to development identified in the SA.</p> <p>The detailed appraisals of the strategic sites and policies were used to inform the development of new policies, such as the strategic approach (SD SP1a) and new housing allocation policies (H SP2; H SP2a-c).</p> <p>Draft versions of the SA Report were provided to ADC throughout its preparation prior to the finalisation of the Main Modifications to the Arun Local Plan. The final SA Report described the recommendations that were made in the draft versions of the SA Report and identified whether they had been addressed within the Local Plan.</p>
2017-2018	Modifications <i>Modified – Arun Local Plan – January 2018 Consultation (2018)</i>	SA of the further Main Modifications to the Arun Local Plan (2018)	<p>An assessment of the residential site at Angmering South and East was undertaken as well as a re-appraisal of the residential site at Angmering North and the employment site at Angmering. ADC took into account the findings of the SA as well as other relevant factors whilst making decisions and revising the main modifications.</p> <p>The SA of the Main Modifications recommended that policies H SP2a, H SP2b and H SP2c should be updated to include the recommendations outlined in the HRA. The wording of Policy H SP2a was updated in the further Main Modifications to ensure no detrimental impact to Pagham Harbour SPA, through compliance with ENV DM2 (Pagham Harbour) and its supporting text.</p> <p>However, two other recommendations outlined in the SA of the Main Modifications and the further Main Modifications relating to protecting the historic environment at Enterprise Bognor Regis (EMP DM2) and the strategic employment sites (EMP SP3); and, incorporating the recommendations from the HRA in</p>

Time period	Plan-making stage	Accompanying SA work	How SA Report was taken into account
			<p>policy W DM1 and the recommendation in the Infrastructure Delivery Plan for policy H SP2a were not specifically addressed in the Local Plan because ADC advised that the combined effect of other polices in the plan are considered to mitigate these issues sufficiently (see <i>Table 8.2: Possible mitigation for potential negative effects identified</i> in the SA of the further Main Modifications to the Arun Local Plan).</p> <p>The SA Report concluded that no further recommendations were necessary as a result of the changes to the SA necessitated by the further Main Modifications.</p>

## 4 How opinions of consultation bodies and the public have been taken into account

### Introduction

- 4.1 At each stage of the Local Plan's development, an SA Report was published alongside the Local Plan for consultation bodies specifically relating to the SEA Regulations (i.e. Historic England, Natural England and the Environment Agency), a range of other organisations, such as surrounding local authorities and, and the public. The SEA Regulations require the SEA Adoption Statement to summarise how any opinions expressed by the public and the consultation bodies about the SEA have been taken into account.
- 4.2 The Council produced a [Statement of Community Involvement](#) in 2012, a [Statement of Consultation](#) in 2015, and a [Statement of Consultation Addendum](#) in 2017 under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. These documents indicate how ADC engaged with the public and organisations throughout the Local Plan preparation process.
- 4.3 The Local Plan consultation stages and responses received relating to the SA Reports are summarised below. **Appendix 11** of both the SA of the Main Modifications (2017) and the further Main Modifications (2018) to the Arun Local Plan presents the consultation responses received as part of the SA process and describes how these comments were addressed in the SA Reports.

### Scoping Report for the Core Strategy Issues and Options (2005)

- 4.4 The Scoping Report for the Core Strategy Issues and Options was published for consultation alongside the Core Strategy Issues and Options document from 29<sup>th</sup> September 2005 to 10<sup>th</sup> November 2005.

### Scoping Report of the Core Strategy (2008)

- 4.5 A revised Scoping Report of the Core Strategy was prepared by EDAW/AECOM for ADC in November 2008 to update the context and baseline information; the relevant plans, policies and programmes; the key sustainability issues; and, to undertake a review of the SA Framework presented in the 2005 Scoping Report. The Scoping Report was issued for consultation from 21<sup>st</sup> November 2008 to 9<sup>th</sup> January 2009. Responses were received from SEEDA, the Environment Agency, the Highways Agency, Natural England, Worthing Council, Chichester District Council and West Sussex County Council who suggested minor wording changes to the SA Framework and the inclusion of additional plans and new or updated sources of evidence in the SA Report<sup>10</sup>. These recommendations were taken into account in the subsequent iterations of the SA Report.

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<sup>10</sup> Summary of consultation responses for the Scoping Report - <https://www.arun.gov.uk/download.cfm?doc=docm93jijm4n2712.pdf&ver=2362>

## Initial Sustainability Commentary on the Core Strategy Options for Growth (2009)

- 4.6 In view of the Options for Growth consultation not being a statutory stage in the Local Plan process, it was decided by ADC not to undertake a full SA of the three spatial options for accommodating growth at this stage but instead carry out an assessment of the options with an accompanying sustainability commentary (Option 1 – Sustainable Urban Extensions to Coastal Towns<sup>11</sup>; Option 2 – New Settlement at Ford (eco-town); and, Option 3 – Expansion of Key Inland Settlements<sup>12</sup>). In February 2009, EDAW/AECOM prepared the [Initial Sustainability Commentary on the Core Strategy Options for Growth](#) which applied the SA Framework, as amended to incorporate the consultation comments on the 2008 Scoping Report, to each of the growth options. A preliminary appraisal of the options was undertaken which was consulted on during two workshops on 12<sup>th</sup>/13<sup>th</sup> January 2009 with ADC officers and selected officers from ADC and West Sussex County Council with particular specialisms in housing, education, health and transport, as well as other representatives from external bodies such as the Environment Agency. Following the workshops, the results of the appraisal were updated to take into account the advice received at the workshops. The SA concluded that Option 1 was the most sustainable providing positive results especially in relation to the social elements of the assessment.
- 4.7 This document and a [District Analysis Baseline Report](#)<sup>13</sup> accompanied the Core Strategy Options for Growth Strategy for consultation from 12<sup>th</sup> February 2009 to 2<sup>nd</sup> April 2009. During the consultation period on the Core Strategy Options for Growth, 1,188 responses were received<sup>14</sup>. Inconsistencies with the sustainability commentary and scoring were the main issues raised during the Core Strategy Options for Growth consultation which were relevant to the SA. For Option 1, particularly development at North-West Bersted, the main issues raised related to the impact of additional traffic; problems with flooding and sewerage; loss of character; loss of Best and Most Versatile agricultural land; and, the impact on local infrastructure. For Option 3, the main concerns raised related to congestion on the A259 and the impact of development on local infrastructure (for development at Angmering); and, potential flooding and the loss of employment related to horticultural units (for development at Littlehampton). Furthermore, for Option 3, concerns were raised in relation to flooding and sewerage, loss of biodiversity and the lack of infrastructure facilities in relation to the site at Barham/Eastergate/Westergate (BEW). Representations were analysed by ADC officers, published on the Council's Local Plan web page and considered by Councillors.
- 4.8 In 2010, following the Government's announcement of its intention to revoke the Regional Spatial Strategy (the South East Plan) and the implications of the Localism Bill at the time, ADC carried out a public consultation on six alternative figures for housing growth and three alternative figures for employment growth for the period to 2028, between 15<sup>th</sup> November 2010 and 28<sup>th</sup> February 2011. Based on an analysis of the responses received, ADC decided that two figures for housing growth (400dpa and 565dpa) and a figure of 25.5ha of employment land should form the basis for the Local Plan.

## Interim SA of the Arun Consultation Draft Local Plan 2013-2028 (2012)

- 4.9 An [Interim SA of the Arun Consultation Draft Local Plan 2013-2028](#) was published for consultation from 19<sup>th</sup> July 2012 to 10<sup>th</sup> September 2012. Nineteen public information events were held during

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<sup>11</sup> In the Bognor Regis area – South Pagham, North Pagham, North-west of Chalcraft Lane, West of Felpham, North of Middleton. In the Littlehampton area – West Bank, North Littlehampton (Courtwick), North Littlehampton (Toddington Nurseries), North of Rustington, Ferring.

<sup>12</sup> In the West of the District – Barham/Eastergate/Westergate Area, Arundel, Fontwell, Walberton, Yapton, Climping/Horsemere Green. In the East of the District – Angmering (East and South), Angmering (North), Findon.

<sup>13</sup> The District Analysis Baseline Report identified the key issues and challenges in the District for social welfare and communities; economic vitality; access and transport; environmental integrity; and, the efficient use of resources.

<sup>14</sup> Summary of consultation responses received on the Core Strategy Options for Growth - <https://www.arun.gov.uk/download.cfm?doc=docm93jijm4n3652.pdf&ver=3320>

the consultation period. There were 26 representations received by 18 consultees relating to the SA:

- The EA and CPRE (Arun District) expressed concern about the methodology and presentation of the SA, particularly the lack of appraisal of reasonable alternatives and the present position i.e. the 'do nothing' scenario.
- West Sussex County Council highlighted that the Local Transport Plan should be referred to.
- Natural England expressed concern that the SA does not transparently test the Plan against the issue of biodiversity. They recommended the inclusion of additional sub-objectives relating to the landscape, biodiversity and geodiversity.
- Barnham Parish Council and CPRE (Sussex) raised the issue that the SA did not effectively assess the effects of the Local Plan.
- Twelve members of the public also expressed concern about the lack of assessment of reasonable alternatives, accuracy and consistency of scoring, and the overall presentation of the SA.

4.10 The representations from the Draft Local Plan consultation were summarised and reported to the Local Plan Sub-Committee along with the proposed changes to the Draft Local Plan and the SA Report at a series of meetings on 31<sup>st</sup> January 2013, 7<sup>th</sup> March 2013, and 8<sup>th</sup> May 2013 and at the subsequent Special Council meeting on 9<sup>th</sup> May 2013. One of the main outcomes of the Draft Local Plan consultation was that further evidence gathering was required to validate the housing need figures. This resulted in a pause in Local Plan preparation for further technical work.

## Intended SA of the Publication Version of the Arun Local Plan (2013)

4.11 An [Intended SA of the Publication Version of the Arun Local Plan](#) was produced in spring 2013 that appraised the content of the proposed Local Plan. However, as a result of a pause on the Local Plan to agree the Housing Strategy, this was never officially published beyond being part of the committee papers for the Local Plan sub-committee and Full Council. It was not subject to any formal consultation.

## SA of the Publication Version of the Arun Local Plan (2014)

4.12 During the pause on the Local Plan process, a workshop was held on 27<sup>th</sup> February 2014 which asked Members to consider 120 sites in 13 locational clusters, against the SA objectives. A matrix of the results of this workshop was reported to the Local Plan Sub-Committee on 27<sup>th</sup> March 2014 and Full Council on 30<sup>th</sup> April 2014. Once the Local Plan production process was restarted with agreement over the Housing Strategy, the Local Plan was reviewed. The Local Plan Publication Version and the [SA of the Publication Version of the Arun Local Plan](#) were subject to public consultation from 30<sup>th</sup> October 2014 to 12<sup>th</sup> December 2014. A summary of the main issues raised in the 24 representations on the SA Report are as follows<sup>15</sup>:

- The Villages Action Group raised significant concerns about the accuracy and consistency of the SA particularly the consideration of alternatives; the site selection process; the reasons for choosing preferred options and the assessment against Neighbourhood Plans.
- West Sussex County Council raised some minor clarification any typographical points relating to SA objectives 5 and 6. It also suggested that, in relation to Ford and Fontwell, reference to specific housing figures should be removed as there is insufficient evidence to establish a quantum.

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<sup>15</sup> A summary of these consultation responses and how they were addressed in the SA is provided in Appendix 11 of both the Main Modifications and the further Main Modifications to the Arun Local Plan.

- The Communities Against Ford Eco-Town considered the correct conclusions were reached by ADC especially in the absence of a confirmed, approved and implemented A27 Arundel bypass.
- Aldingbourne, Eastergate, Barnham and Walberton Parish Council's raised concerns over the plan preparation and consultation process; and, the lack of clarification as to how preferred sites were chosen.
- Members of the public raised concerns over the loss of Best and Most Versatile agricultural land; the impact on the South Downs National Park; the level of housing assessed at each site; the impact on social, education and community infrastructure, the road network, and, flooding and drainage; the lack of consideration of mitigation measures; the lack of appraisal of reasonable alternatives; the accuracy and consistency of scoring; and, the presentation of the SA.

4.13 The Arun Local Plan and its associated 2014 SA Report were submitted to the Government for examination in January 2015. As stated in section 2, the Inspector's preliminary findings found that the audit trail of decision making was not clear (i.e. the reasons for selecting reasonable alternatives, preferred alternatives, and discounting alternatives) which echoed the consultation comments received on the Interim SA of the Arun Consultation Draft Local Plan 2013-2028 and the SA of the Publication Version of the Arun Local Plan. The Inspector formally suspended the EiP in February 2016 for 15 months. During the suspension of the EiP process, ADC engaged with stakeholders, site promoters, statutory organisations, and neighbouring authorities. ADC also commissioned LUC to undertake a review of the submitted 2014 SA Report and to undertake SA of the modifications to the Plan.

## SA Scoping Statement (2016)

- 4.14 A review of the previous SA Reports was undertaken in June 2016 which resulted in a number of amendments being proposed in order to ensure that the consultation comments and the Inspector's concerns were addressed, including refining the SA Framework and summarising for each option being considered as part of the preparation of the Local Plan the reasons for selecting the alternatives considered; the main SA findings for each alternative; and the reasons for selecting the preferred alternatives and discounting other alternatives. The [SA Scoping Statement](#) which outlined the new approach to SA was sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) in July 2016 for comment.
- 4.15 Following the consultation, the wording of five SA objectives (SA objectives 2, 7, 11, 12 and 13) was revised and new sub-objectives included in the SA Framework to take account of the recommendations made by the statutory consultees. The consultation responses also recommended referencing additional plans and new or updated sources of evidence to inform the review of relevant plans, policies and programmes and baseline information which were included in the next iteration of the SA Report.

## SA of the Main Modifications to the Arun Local Plan (2017)

- 4.16 The [SA of the Main Modifications to the Arun Local Plan](#) addressed the consultation comments and the Inspector's findings on the 2014 SA Report. The SA Report applied a clear SA Framework to the appraisal of sites and policies; summarised the progression of sites; discussed the issues that informed growth levels at various locations; identified the formation of alternatives and the reasoning for their inclusion as reasonable alternatives; assessed individual effects as well as cumulative effects of implementing the Local Plan. Additionally, this SA Report considered the content of the further work commissioned during the suspension period.
- 4.17 The SA Report was published for consultation alongside the Main Modifications to the Arun Local Plan from 10<sup>th</sup> April 2017 to 30<sup>th</sup> May 2017. No comments were received from the statutory consultees on this SA Report. Representations were received from 11 consultees relating to the SA:

- Insufficient weight given to protecting Best and Most Versatile agricultural land.
- Unsustainable levels of growth proposed in the Local Plan which will impact on infrastructure in the District.
- Disagree with the assessment findings for the strategic sites at Angmering.
- SA Report is not concise and simple.
- Disagree with the calculation of future flood risk in the Strategic Flood Risk Assessment and consequently the appraisal findings relating to SA objective 9.

4.18 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. These comments were considered through the Examination process and an updated SA Report was produced to appraise the further Main Modifications that arose.

## SA of the further Main Modifications to the Arun Local Plan (2018)

4.19 During the course of the resumed Examination, further Main Modifications emerged either as suggested by ADC, the Planning Inspector or other parties. In November/December 2017, ADC finalised the *Table of further Main Modifications* and the *Modified Arun Local Plan January 2018 Consultation*. The further Main Modifications were assessed using the SA Framework to determine whether the additional modifications to the Local Plan would change any of the previous SA findings. The [SA of the further Main Modifications to the Arun Local Plan](#) contained an assessment of the further Main Modifications as well as presenting an assessment of the unchanged policies and site options that were appraised for the previous iteration of the Local Plan.

4.20 This SA Report was published for consultation from 12<sup>th</sup> January 2018 to 23<sup>rd</sup> February 2018. Representations from six consultees were received during the consultation period and are summarised in **Table 4.1** along with how these have been considered and addressed by ADC.

**Table 4.1 Consultation comments on the further Main Modifications to the Arun Local Plan**

Name	Comment	Action (how comments have been addressed in the SA Reports)
Angmering Parish Council	APC has already raised their concerns about the output from the SA process. Appendix 11 of the SA Report acknowledges the Parish Council's submission but because of the limited SA commissioned by the Council, the SA does not have the scope to fully re-assess any reasonable new alternatives. For example, Angmering Employment site 7. The site in the further Main Mods still scores a significant positive effect against SA objective 15 despite the size of the site being reduced from 8ha to 1.5ha.	The SA assessed all reasonable alternatives, including a reassessment of 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, Angmering Employment Site and an assessment of Angmering South and East in December 2017.  The scoring of sites is based on a set of assumptions outlined in Appendix 8. The size of the site has been reduced to 3ha not 1.5ha as stated in the representation and was assessed in the SA of the further Main Modifications. The score for this SA objective based on the assumptions has been corrected to a minor positive effect (see Chapter 1 Introduction for more information relating to the correction).
	At the hearings it was confirmed that 800+ dwellings was not achievable unless site 7 was reduced. By allocating 800+ dwellings at Angmering North as a given, the SA has pre-determined the outcome of the examination. The SA has also	The July 2016 SA tested 500 dwellings at Angmering as the low option to 800 dwellings on the site, which was also assessed. Paragraph 2.36 of the SA explains why the high capacity for the sites was selected for inclusion in the plan. Reasonable Alternative RA1 tests the two employment allocations together of Enterprise

Name	Comment	Action (how comments have been addressed in the SA Reports)
	<p>failed to test the impact on SA objectives of not reducing the employment site against a lower figure of 500 dwellings that Angmering North could deliver alongside the original 8.3ha of employment land.</p>	<p>Bognor Regis and Angmering at 8.3ha. The SA of the further Main Mods assesses Angmering North at 3ha as an individual site.</p>
	<p>There is a need to revisit the approach to delivering necessary housing in Angmering. APC suggest a new alternative of reduced strategic housing numbers and increased housing numbers delivered by the Angmering Neighbourhood Plan.</p>	<p>ADC advised that this is to be addressed through the Non-Strategic Sites DPD. Therefore, no alternative testing is needed.</p>
Pagham Parish Council	<p>Representation relates to the Sussex coastal strip being designated as a suitable area for Glasshouse/ Horticulture crop production which should be reserved for food production rather than for housing development.</p>	<p>The protection of higher value agricultural soils is addressed directly by policy SO DM1 (Chapter 11 Soil) in the Local Plan.</p> <p>The SA Framework includes an objective relating to avoiding the loss of Best and Most Versatile agricultural land (SA objective 11). The SA identifies significant negative effects on SA objective 11 for seven strategic residential sites, as well as Angmering South and East, and both strategic employment sites as the development of these areas would result in the loss of Best and Most Versatile agricultural land. ADC made decisions regarding the strategic sites based on the findings of the SA as well as other planning considerations.</p>
	<p>Representation relates to the findings in the HRA and the SA which state, 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. The HRA/SA recommends flows from residential developments which exceed the available headroom at Pagham Wastewater Treatment Works to be transferred to alternative discharge locations. The Memorandum of Understanding between Southern Water and ADC does not provide any proposals/ programmes or costings.</p>	<p>Reflecting the findings in the HRA, the SA records significant negative effects for policy W DM1: Water Supply and Quality and policy H SP2a (SD1 – Pagham South) as the policies in the Modified Arun Local Plan January 2018 Consultation do not include mitigation measures to avoid, reduce or offset the negative effects identified for SA objective 8: Water Quality.</p> <p>ADC's response to this recommendation made in the HRA and the SA is that the drainage solution and requirements for resolving the waste water discharge is a matter to be resolved by the infrastructure provider and the developer. Furthermore, ADC stated that the supporting text of W DM1: Water Supply and Quality and a new sub-section inserted in Infrastructure Provision &amp; Implementation explains the waste water constraints and the need to resolve this issue in order to deal with the issues raised within both the HRA and SA.</p>
ECE Planning OBO Welbeck Strategic Land II LLP	<p>The 2014 SA Report indicated that growth at Fontwell of approximately 500-900 dwellings was likely to have positive impacts on a number of sustainability objectives so it is unclear why the area's potential for development has not been explored further.</p>	<p>The 2014 SA Report findings were re-examined during the suspension period and an appraisal of between 500 and 900 residential units was undertaken. The level of housing proposed on this site (up to 400 dwellings) and assessed in the Main Mods and the further Main Mods reflects the capacity established through an appeal decision in July 2017 (WA/22/15/OUT APP/C3810/V/16/3143095).</p>
Member of the Public	<p>No account appears to have been taken of historic landscape in the SA.</p>	<p>SA Objective 12 of the SA Framework seeks to protect, enhance and restore Arun's designated heritage assets and their settings which include historic landscapes. All elements of the Local Plan were assessed against this SA Objective in order to determine the likely effects on the</p>

Name	Comment	Action (how comments have been addressed in the SA Reports)
		historic landscape.
Member of the Public	Representation relates to developing Best and Most Versatile agricultural land specifically Pagham North and Pagham South.	<p>The protection of higher value agricultural soils is addressed directly by policy SO DM1 (Chapter 11 Soil) in the Local Plan.</p> <p>The SA Framework includes an objective relating to avoiding the loss of Best and Most Versatile agricultural land (SA objective 11). The SA identifies significant negative effects on SA objective 11 for seven strategic residential sites including Pagham South and North, as well as Angmering South and East, and both strategic employment sites as the development of these areas would result in the loss of Best and Most Versatile agricultural land. ADC made decisions regarding the strategic sites based on the findings of the SA as well as other planning considerations.</p>
	Reference is also made to the impacts on local roads from new developments particularly on the A27.	The Arun Transport Study considered the impacts on the road network from the additional development proposed in the Local Plan. The Infrastructure Delivery Plan assessed the infrastructure implications associated with developing each site. Policy T SP3 (Chapter 15 Transport) safeguards land for the provision of future improvements to the strategic and local road network, including the A27 Arundel Bypass.

## 5 Why the adopted Local Plan was chosen in light of reasonable alternatives

### Introduction

- 5.1 The SEA Regulations require assessment of the likely significant effects of implementing a plan, and “reasonable alternatives”. Developing options or alternatives is an important part of both the plan-making and Sustainability Appraisal process. Reasonable alternatives were appraised throughout the preparation of the Local Plan.

### Core Strategy Options for Growth (2009)

- 5.2 The Core Strategy Options for Growth document was published in February 2009. The Options for Growth highlighted in this document were influenced by the consultation responses on the Core Strategy Issues and Options document in 2005 as well as ongoing consultation with key statutory bodies and major service providers.
- 5.3 The document identified a Vision for Arun in 2026 and seven broad strategic objectives for delivering the Vision. It also identified three spatial options for growth encompassing 20 potential locations for development across the District. A total of ten possible locations were identified for extension to the coastal towns (Option 1)<sup>16</sup>, a further nine for the expansion of inland settlements (Option 3)<sup>17</sup>, with Ford as a possible location for a new settlement (Option 2). Following an initial assessment, 14 locations were considered unsuitable for large scale strategic development. Six potential development locations were carried forward for more detailed analysis. They included three potential development locations on the edge of the coastal towns (North-west of Chalcraft Lane, North Littlehampton [Toddington Nurseries], North Littlehampton [Courtwick]), Ford, and two locations for major expansion of inland villages (Barnham/Eastergate/Westergate Area, Angmering [East and South]). In February 2009, a Sustainability Appraisal<sup>18</sup> was undertaken for the three spatial options identified in the Arun Core Strategy Options for Growth document<sup>19</sup>. The SA concluded that Option 1 was the most sustainable providing positive results especially in relation to the social elements of the assessment.

### Arun Consultation Draft Local Plan 2013-2028 (2012)

- 5.4 The Arun Consultation Draft Local Plan presented the draft spatial vision, objectives and strategic policies for development in Arun. The strategic policies presented in the Consultation Draft Local Plan were developed taking into consideration the consultation responses and the SA findings from the work carried out for the Core Strategy Issues and Options (2005 and 2008) and Options for Growth (2009). These policies were subject to SA in the Interim SA of the Arun Consultation Draft Local Plan.

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<sup>16</sup> In the Bognor Regis area – South Pagham, North Pagham, North-west of Chalcraft Lane, West of Felpham, North of Middleton. In the Littlehampton area – West Bank, North Littlehampton (Courtwick), North Littlehampton (Toddington Nurseries), North of Rustington, Ferring.

<sup>17</sup> In the West of the District – Barham/Eastergate/Westergate Area, Arundel, Fontwell, Walberton, Yapton, Climping/Horsemere Green. In the East of the District – Angmering (East and South), Angmering (North), Findon.

<sup>18</sup> EDAA/AECOM, 2009. *Arun District Council Core Strategy Options for Growth Sustainability Commentary* [pdf]. Available at: <http://www.arun.gov.uk/download.cfm?doc=docm93jjim4n1672.pdf&ver=1314> [Accessed 29 June 2016]

<sup>19</sup> Option 1 – Sustainable Urban Extensions to Coastal Towns

Option 2 – New Settlement at Ford (Eco-town)

Option 3 – Expansion of Key Inland Settlements

- 5.5 The strategic housing locations proposed in the Consultation Draft Local Plan were informed by those appraised in the Core Strategy Options for Growth and submissions through the Strategic Housing Land Availability Assessment (SHLAA) in 2009, and its update in 2012. Strategic employment land allocations were identified in the Enterprise Zone; at Angmering as employment development in Angmering under the 2003 Local Plan was not achieved; and, at Littlehampton as planning consent was granted in 2011/12 for the development of housing, employment and other land at Courtwick and North Littlehampton.
- 5.6 During the preparation of the Arun Consultation Draft Local Plan, consultation on six alternative figures for housing and three alternatives for employment land were undertaken. As part of the consultation, broad social, economic and environmental implications were identified for each alternative.
- **Housing**
    - Alternative A – No additional land allocations (175dpa; 2,960 over plan period).
    - Alternative B – Low Growth to meet demographic trends only (362dpa; 6,150 over the plan period).
    - Alternative C – Low to Medium Growth (425 dpa; 7,225 over plan period).
    - Alternative D – Medium Growth (495 dpa; 8,415 over plan period).
    - Alternative E – South East Plan Figures (565 dpa; 9,605 over plan period).
    - Alternative F – Locally Generated Needs Study Figure (610 dpa; 10,370 over the plan period).
  - **Employment**
    - Alternative 1 – Employment that supports housing growth (13-24 hectares).
    - Alternative 2 – Maximisation of job creation and reduce out-commuting (27 hectares).
    - Alternative 3 – Level higher than maximised jobs (higher than 27 hectares).
- 5.7 At a special Council meeting, on 16<sup>th</sup> June 2011, two alternative figures for housing provision were taken forward for consideration in the Arun Consultation Draft Local Plan: 400dpa (midpoint between alternatives B and C should the Regional Spatial Strategy be revoked) and 565dpa (Alternative E due to the South East Plan still forming part of the development plan). A figure of 25.5ha for employment land provision which is a combination of alternatives 1 and 2 was taken forward for consideration in the Arun Consultation Draft Local Plan.

## Publication Version of the Arun Local Plan (2014)

### Reasonable alternatives - Housing growth and residential sites

- 5.8 Under the topic 'Living Place' three levels of housing growth were considered under *Housing Delivery* based on the [Strategic Housing Land Availability Assessment 2012](#), the [Coastal West Sussex Strategic Housing Market Assessment Update](#), and consultation comments received as part of the Consultation Draft Local Plan:
- Low growth level - 400 residential units per year.
  - Medium growth level - 575 residential units per year.
  - High growth level - 900 residential units per year.
- 5.9 The SHMA concluded that 575 dwellings per annum (dpa) would be appropriate over the plan-period. ADC commissioned the [Strategic Housing Market Assessment Validation](#) study to verify the validity of this figure, which concluded that 580dpa is consistent with longer-term trends for housing in the District. A [Housing Study \(Duty to Co-operate\)](#) was carried out in 2013 which identified a need for 550-650 dpa with 700 dwellings per year being the maximum delivered per year. The SA Report concluded that low level growth would not address the issue of affordability and therefore would not be sustainable. The high growth level would require the delivery of

several significant infrastructure projects which the SA Report also concluded would be unsustainable. The medium growth level was considered the most appropriate (575dpa).

- 5.10 In April 2014, an [Assessment of Housing Development Needs Study: Sussex Coast HMA](#) was published which established an objectively assessed need (OAN) of between 550 homes per annum (consistent with demographic projections) and 650 homes per annum (with the higher level supporting stronger household formation, affordable housing delivery and potentially workforce growth). Based on this, ADC considered that 580dpa represented a reasonable target for housing provision which would meet the District's full OAN for housing.
- 5.11 Under the topic *Distribution of Housing*, three levels of growth were considered at Littlehampton, Angmering (North, South and East), Ford, Pagham (North/South), Arundel, Rustington and Ferring strategic sites, while two levels of growth were appraised for the remaining strategic sites (Bognor Regis Eco Quarter/North West of Chalcraft Lane, Barnham/Eastergate/Westergate, Fontwell, Walberton, Climping/Yapton, North Middleton). The SA concluded that Pagham, Arundel, Rustington, Yapton/Climping, and Walberton were the least sustainable options and should not be considered for inclusion as strategic sites in the Local Plan.

### Reasonable alternatives – Employment sites

- 5.12 Under the topic '*Prosperous Place*' three spatial options were considered under *Employment and Enterprise* for the distribution of employment land in the District:
- Alternative 1: Focused north of Bognor Regis and North Angmering.
  - Alternative 2: Creation of a business hub at Ford.
  - Alternative 3: Spread across suitable sites in Flood Zone 1.
- 5.13 Alternative 1 was chosen as the preferred option as it disperses employment land provision to different areas in the District with sustainable transport links and it would also play a key role in regenerating Bognor Regis.

### Reasonable alternatives – Policies

- 5.14 Under the topic '*Sustainable Place*', three alternatives were considered for the policy relating to settlement structure and green infrastructure:
- Alternative 1: Review the boundaries of the Green Infrastructure Corridor policy.
  - Alternative 2: Introduce a Gaps policy to replace Green Infrastructure Corridor policy.
  - Alternative 3: Rely on a rigorous countryside policy to protect the settlement structure of the district.
- 5.15 Alternative 2 was considered the most sustainable and a policy SD SP3 Gaps between Settlements was included in the Local Plan.
- 5.16 Under the '*Connected Place*' topic, three alternatives were considered under *Transport* which were identified in the Arun Transport Study (2013):
- Alternative 1: Realignment of A29.
  - Alternative 2: Extension of Lyminster Bypass A284.
  - Alternative 3: A259 Improvements.
- 5.17 The SA Report concluded that all three alternatives should be included in the Local Plan as they will be delivered alongside strategic development proposed in the plan as part of a mitigation and development facilitation package.
- 5.18 Under the '*Deliverable Place*' topic, three alternatives were considered for *Infrastructure Provision and Implementation*:
- Alternative 1: A Community Infrastructure Levy.
  - Alternative 2: Continued but scaled back Section 106 (S106) agreements.
  - Alternative 3: A combination of the use of CIL and S106.

- 5.19 Alternative 3 was chosen as the preferred option as it would allow for contributions to be taken towards strategic infrastructure and also to address and mitigate for local impacts linked to development of a specific site.
- 5.20 There was significant development and rewriting of policies and supporting text in the Local Plan (including renumbering of policies), and the addition of several new policies to take into account consultation responses received and the SA work that was undertaken in relation to the Consultation Draft Local Plan, in addition to the revised evidence base. All policies were reappraised in the SA of the Publication Version of the Arun Local Plan.
- 5.21 The following list identifies the topics where it was concluded by ADC that there were no reasonable alternative options to be considered as part of the development of the Local Plan:
- Sustainable Place
    - Sustainable Development
  - Prosperous Place
    - Retail; Tourism; Soils, horticulture and equine developments
  - Living Place
    - Design; Health, Recreation and leisure
  - Protected Place
    - Building Conservation & Archaeological Heritage; Natural Environment; Water; Natural Resources & Minerals; Waste Management; Quality of the Environment.

## Main Modifications to the Arun Local Plan

### Reasonable alternatives - Residential sites

- 5.22 Due to the Inspector's findings in relation to the 2014 SA Report and the risk of inconsistencies between that work and the 2016 SA of strategic sites, a reassessment of the 12 sites considered in the 2014 SA was undertaken against the revised SA Framework. This approach ensured that a robust and consistent assessment of all residential site options has been undertaken. The assessments confirmed that there were not any reasonable alternative site options incorrectly discounted in 2014.
- 5.23 At the time of LUC's commission in June 2016, 13 strategic site allocations<sup>20</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.
- 5.24 In July 2016, the revised 12 strategic site options were subject to an initial assessment with the SA findings presented to ADC to help inform decision making. These sites constitute reasonable

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<sup>20</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.

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 of flooding, particularly as a result of climate change.

- 5.25 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 identified multiple constraints to development, and as a result they were discounted as preferred site options.
- 5.26 From September to November 2016, an assessment of the remaining 10 reasonable strategic site options was undertaken and updated regularly as the finalised versions of the technical supporting studies became available.
- 5.27 **Appendix 12** of the Main Modifications and the further Main Modifications to the Arun Local Plan details the progression of sites through the SA process and the reasons for selecting/discounting site options.

### Reasonable alternatives - Employment sites

- 5.28 Two strategic employment sites at Angmering and Enterprise Bognor Regis were also subject to SA<sup>21</sup>. The Enterprise Bognor Regis site comprises 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.

### Growth scenarios and distribution options

- 5.29 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.
- 5.30 ADC 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).

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<sup>21</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.

5.31 **Table 5.1** 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 (included in the evidence base for the Local Plan).

**Table 5.1 June 2016 - Residential Quanta for Scenario & Option Site Combinations**

Site	Scenario				
	Option	1	2	3.1	3.2
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>

5.32 Following the revision of strategic site options and site boundaries in July 2016, there were changes to scenario capacities for several sites. The capacity changes are detailed below:

- Pagham South – from 600 to 300 (low capacity) and 400 (high capacity). A reduction in site capacity reflects the reduction in site area primarily from removing the area subject to the Pagham Harbour Policy (<400m buffer zone);
- Pagham North – from 300 to 600 (low capacity) and 800 (high capacity). Site capacity of approximately 700 units promoted through HELAA;
- Yapton – from 500 to 300 (low capacity) and 400 (high capacity). A reduction in site capacity as a portion of the site now has planning permission;
- Littlehampton – from 1,000 to 1,000 (low capacity) and 1,100 (high capacity). As per the LEGA Delivery Study, 1,000 units on the West Bank with 100 units on the East Bank;
- Angmering North – from 700 to 500 (low capacity) and 800 (high capacity). Boundary and site capacity revised as per HELAA submission;
- Ferring East – from 336 to 350 (both capacities). Site capacity estimated to be 350 units as site promoters did not provide a definitive dwelling capacity for the site which falls within Arun District Council’s jurisdiction;

5.33 Climping – from 500 to 300 (low capacity) and 500 (high capacity). Low capacity calculated as 75dpa for the period 2017 to 2021.

- Table 5.2

5.34 **Table 5.2** 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 5.2 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
<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

5.35 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 residential strategic 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. A reduction in capacity as it may not be possible to deliver the site in its entirety during the plan period because the site would be expected to be phased in line with the upgrading of Lidsey WWTW, which is currently scheduled for 2023 and therefore only 2,300 dwellings could be delivered within the Plan period.
- Ford – from 2,000 (high capacity) to 1,500. The draft Ford Parish Council Neighbourhood Plan has proposed an allocation of 1,500 homes on the Ford Airfield site and the promoters were seeking to deliver this level of development.
- Littlehampton - West Bank – from 1,100 (high capacity) to 1,000. Development of 1,000 homes along the West Bank, excluding the additional 100 homes on the East Bank. The LEGA Delivery Study considers that these sites on the East Bank should come forward on an individual basis in accordance with the over-arching LEGA Local Plan policy.
- Climping – from 500 units to 300 units. The reduction in units reflects an application submitted by the developer of the site in January 2017.

## Further Main Modifications to the Arun Local Plan

### Reasonable alternatives - Residential sites

- 5.36 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 with the following exceptions.
- 5.37 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 (appraised separately). 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.
- 5.38 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 5.3**. The revised capacity figures for Climping (300 units) and Littlehampton - West Bank (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.
- 5.39 The capacity figure for SD7 Yapton has been revised from 400 units to 500 dwellings based on a recommendation in the Inspector's Report (July 2018). The SA assessed development of 300 and 400 dwellings at Yapton under the low and high scenarios. Following the recommendation for increasing the capacity at Yapton, a review of the SA findings was undertaken. This concluded that the development of 500 dwellings rather than 400 dwellings as specified in the SA of the further Main Modifications on the same site would not result in significant changes to the SA conclusions for this site.
- 5.40 **Table 5.3** summarises the final housing trajectory figures which will be required to meet the revised OAN.

**Table 5.3 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
<b>Inland Arun</b>		
SD5	Barnham/ Eastergate/ Westergate (BEW)	2,300
SD6	Fontwell	400
SD7	Yapton	500 (300 and 400 dwellings assessed in the SA of the Main Modifications and the SA of the further Main Modifications)
SD8	Ford	1,500
SD9	Angmering North	800

Site Reference	Strategic Site	Site Capacity
SD10	Climping	300
SD11	Angmering South and East	250 <sup>22</sup>
<b>Total</b>		<b>10,750</b>

### Reasonable alternatives - Employment sites

- 5.41 Following the Examination process, discussions between ADC and the site promoters determined that the boundary of the site at Angmering should be revised and the size of the employment site reduced from 8.3ha to 3.0ha. Therefore, a reassessment of the site was undertaken in December 2017.

### Reasonable alternatives - Policies

- 5.42 In light of the comments received during the Examination process, a number of policies were 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. Of the 63 further Main Modifications, the SA assessment scores for 12 policies were revised, namely for SD SP1a, H SP2a (SD1 and 2), H SP2a (SD3), H SP2c (SD6), H SP2c (SD7), H SP2c (SD9), H SP2c (SD10), H DM3, H DM4 (new policy), D DM3 (policy deleted), OSR DM1 and INF SP2. The effect of the further Main Modifications on these policies generally removed uncertainty associated with effects and assigned positive scores to previously negative or negligible scores.
- 5.43 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 in the SA of the further Main Modifications to the Arun Local Plan.

<sup>22</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.

## 6 How the environmental and sustainability effects of the Local Plan will be monitored

- 6.1 The SEA Regulations require that “*The responsible authority shall monitor the significant environmental 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), and that the environmental report should provide information on “*a description of the measures envisaged concerning monitoring*” (Schedule 2).
- 6.2 The Government’s latest SA Guidance in the National Planning Practice Guidance<sup>23</sup> states that details of the proposals for monitoring the significant effects of implementing the adopted local plan should be included in the Sustainability Appraisal report, or the post-adoption statement (i.e. this document). Appendix 6 of the SA Report for the Publication Version of the Arun Local Plan presented a Monitoring Framework. Some of the indicators proposed in the 2014 SA Report were included in the revised Monitoring Framework presented in chapter 9 of the SA Reports for the Main Modifications and the further Main Modifications to the Arun Local Plan alongside the SA Framework. These monitoring indicators are also presented in **Table 2.1**.
- 6.3 For further information, please refer to the Arun District Council’s website: [www.arun.gov.uk](http://www.arun.gov.uk)

LUC

July 2018

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<sup>23</sup> Ministry of Housing, Communities & Local Government, 2015. National Planning Practice Guidance - Strategic environmental assessment and sustainability appraisal [online]. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>