# ARUNDEL NEIGHBOURHOOD PLAN 2

# STRATEGIC ENVIRONMENTAL ASSESSMENT/SUSTAINABILITY APPRAISAL SCOPING REPORT

AUGUST 2018

#### Introduction

This is a Scoping Report of a Sustainability Appraisal (SA/SEA), incorporating a Strategic Environmental Assessment, that will accompany the forthcoming Arundel Neighbourhood Plan Review (ANP2).

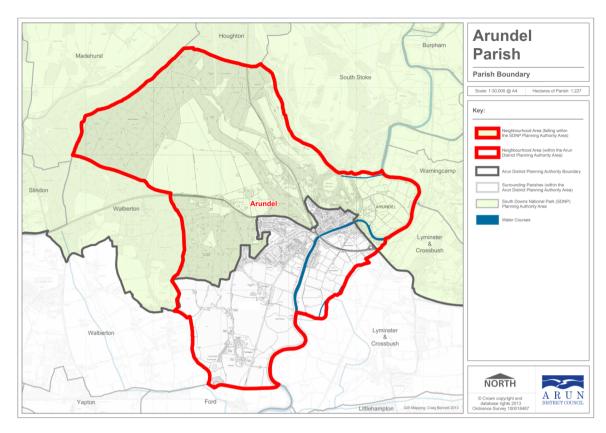
The report and its appendices should be regarded as the Scoping Report of the ANP2 in accordance with Stage A of the provisions of the Environmental Assessment of Plans & Programmes Regulations 2004 (which implement EU Directive 2001/42). It is therefore being sent to you and other statutory consultees for comment for a fiveweek period ending on 11 September 2018.

### **Background**

The ANP2 is being prepared by Arundel Town Council as the qualifying body under the 2012 Neighbourhood Planning (General) Regulations. In accordance with the 2004 Regulations, the lead local planning authority (LPA), Arun District Council (ADC), has confirmed that the plan will need to be screened again as the same scope and evidence base of the made Arundel Neighbourhood Plan 2014-2029 (ANP1) may no longer be up to date.

A formal screening opinion has not yet been sought, however, the Town Council is mindful of the EU Directive/Regulations and of the obligations of the Plan to meet the Basic Conditions (in terms of demonstrating it will 'contribute to the achievement of sustainable development'). Given the likely contents of the Plan, it has therefore assumed that an SEA will be required and it has chosen to undertake this as part of a wider Sustainability Appraisal (SA/SEA).

The northern part of the Parish lies within the area of the South Downs National Park Authority (SDNPA), and is therefore also being consulted. The LPAs have an arrangement in place to deal with the designated Arundel Neighbourhood Plan Area (see Plan A overleaf) that follows the Parish boundary, and ADC carries out the main administration of the project. The neighbourhood area was designated as part of the preparation of the ANP1 and is not proposed to be amended.



Plan A: Designated neighbourhood area

The guidance for undertaking SA/SEA is contained in the Planning Practice Guidance (ID 11-030), which emphasises that it must "only focus on what is needed to assess the likely significant effects of the neighbourhood plan" and on the "environmental impacts that are likely to be significant". It states that this "does not need to be done in any detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan".

STAGE A: This stage sets the context of the assessment by identifying the baseline data and establishing the scope of assessment.

- 1. Identification of relevant plans, policies, and programmes. Any existing requirements that need to be taken into account or incorporated into the plan are identified.
- 2. Review of baseline data. Data about environmental, social and economic issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation.
- **3. Identification of Sustainability Issues.** The review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan.
- **4. Development of the SA Framework.** The assessment criteria used to assess the impact of options and reasonable alternatives is undertaken.
- **5. Identification of initial plan options.** Taking into account best practice, initial identification of options and reasonable alternatives is undertaken.
- **6. Consultation.** On the scope and alternatives for assessment it is necessary to consult Statutory Consultees; Natural England, Historic England and the Environment Agency.

The SA/SEA scoping exercise consist of five stages (A1 – A5). The SA/SEA framework objectives (set out in Stage A4) will be used to assess the spatial strategy options for distributing development in the Parish. Its conclusions will direct the selection of sites to those locations assessed as sustainable, taking account of the SA/SEA and the Town Council's view on the relative acceptability to the local community of the spatial options, bearing in mind the need for the Plan to win a majority vote at a referendum.

#### **Emerging ANP2 Policy Scope**

It is expected that the vision and key objectives of the ANP2 will be the same as the made ANP1, as the policy context, opportunities and constraints are much the same. The precise scope and nature of the Neighbourhood Plan policies is yet to be determined by the Town Council after consultation exercises over the next few weeks.

However, the ANP2 will contain site-specific policies including policies to allocate land for housing development. The ANP2 will also contain other policies, all of which will be in general conformity with the relevant saved development plan documents, and will accord with the provisions of the new National Planning Policy Framework (NPPF). The consideration of the scope of these potential policies has been progressing and further consultations are taking place over the next few weeks.

As a guide to inform this scoping exercise, the early draft list of potential policies is as follows:

- i. A Spatial Plan for the Parish Defining the built-up area boundary of the town (on Policies Map) to reflect the defined boundary of the made NP but also to allow for any proposed allocation(s) in the Plan. Identifies special value of the LAN DM2 Setting of Arundel Policy and SD6 safeguarding views in relation to Arundel Castle as a key landmark in the South Downs National Park;
- ii. Housing Site Allocations Allocates one or more sites setting indicative housing number, type, phasing and other relevant key development principles;
- iii. Community Facilities Identifies all existing community facilities for the purposes of:
  - Protection of all existing facilities unless use financially unviable;
  - Encouragement of proposals that sustain or extend the viable use;
  - Allocates land for new public car parking; and
  - supports Streetscene (a Town Council project to improve public areas in the town centre) proposals.
- iv. Town Centre Defines a town centre area, and primary shopping area (on Policies Map) to manage retail leisure and commercial development in Arundel and resists net loss of public car parking spaces in the Town Centre Area unless community benefit outweighs loss;
  - Defines new layout and uses acceptable;
  - Allocates land for a mixed town centre/workshop/housing and public events space scheme, subject to the re-provision of car parking space;
  - To support proposals to create a new pedestrian link, as per the Streetscene project.
- v. Business Hubs replaces ANP Policy 15 with same content on new B1 uses plus supporting new business hubs to recognise their value, support their expansion and allocating sites (on Policies Map) for the purposes of delivering additional business hub/s.

- vi. Green Infrastructure Network Establishes a Green Infrastructure Network (on Policies Map) with the River as the spine of Arundel, and associated network of open spaces, allotments, playing fields, woodlands, assets of biodiversity value, children's play areas, footpaths, bridleways and cycleways (includes Streetscene Project recommendation of linking green spaces). Proposes the delivery of a new pedestrian/cycle bridge over the river and allocates land either side to achieve satisfactory access. It also encourages recreational or tourism use of the River and its immediate environs. The policy will require proposals lying within or adjoining the Network to maintain or enhance the connectivity, maintenance and improvement of the Network.
- vii. Buildings and Structures of Character Propose to add buildings to saved Policy 13.

#### Other Plans & Programmes (Stage A1)

The National Planning Policy Framework (NPPF) published by the Government is an important guide in the preparation of local plans and neighbourhood plans. A revised Framework was published in July 2018 and, given the ANP2 will be submitted after 24 January 2019, the new Framework will apply for the purpose of its examination.

The following paragraphs of the NPPF 2018 are considered especially relevant:

- Vitality of town centres (§85)
- Supporting a prosperous rural economy (§83)
- Sustainable, inclusive and mixed communities (§61)
- Promoting healthy and inclusive communities (§91)
- Social, recreational and cultural Facilities (§92)
- Natural environment and landscape (§160 §176)
- Heritage assets (§184 §197)

The Neighbourhood Plan must also be able to show that its policies are in general conformity with the strategic policies of the development plan, which currently comprises the Arun District Local Plan 2011-2029. It is expected that a number of policies of the ANP1 will be saved as they remain relevant and up-to-date in their made format (see below). Some others will be replaced by policies of the ANP2 and some others will not be saved as they are no longer necessary or relevant.

A number of policies in the Local Plan provide a policy framework for the ANP2:

- SD SP1 Sustainable Development defines how the presumption in favour of sustainable development contained in the NPPF will be applied.
- SD SP2 Built-Up Area Boundary (BUAB) defines BUAB for the main towns and villages.
- C SP1 Countryside defines areas outside of the BUAB as countryside.
- GISP1 Green Infrastructure and development defines a Green Infrastructure Network to encourage protection and enhancement.
- LAN DM1 Protection of landscape character Safeguards the setting of the South Downs National Park.
- LAN DM2 The Setting of Arundel Safeguards the setting of Arundel.
- EMP DM1 Employment Land Seeks to protect and enhance existing employment sites and sets out approach to employment land.
- RET SP1 Hierarchy of Town Centres Requires Arundel to maintain its existing role as a service centre providing both a range of shops and services for the

- local population and fulfilling a specialist role as a tourist and visitor destination and draws Primary and Secondary Shopping Frontages.
- RET DM1 Retail development Sets out criteria for town centre uses.
- TOU SP1 Sustainable tourism and the visitor economy Seeks to protect and promote tourism assets.
- H SP1 The housing requirement allocates a number of Strategic Site
  Allocations across the District. No specific requirement for land allocations in
  Arundel but NPs in the District need to contribute to 1,250 total homes target
  to 2031 or ADC will allocate sites. Major strategic allocations at Ford,
  Littlehampton and Barnham etc may have important 'push and pull'
  influences on Arundel.
- HWB SP1 Health & Wellbeing Requires design to maximise health & wellbeing.

The policies do not seek major forms of development from Arundel, but there is potentially a requirement for housing allocations or applications in the Parish to contribute to meeting the overall housing supply target set out in Policy HSP1, ADC is currently preparing its methodology for calculating the distribution of this allocation and proposes to consult on the proposed methodology in September 2018.

A number of policies from the made ANP1 are proposed to be saved in their current form:

- Policy 4 Castle Stables and Ford Road (Old Gas Works) The Brewery Hill allocation has been completed and will therefore not be saved.
- Policy 6 Transport and Access
- Policy 7 The Victoria Institute
- Policy 8 Arundel Lido
- Policy 9 Mill House Farm
- Policy 11 Local Green Spaces
- Policy 12 Flood Defences
- Policy 13 Buildings and Structures of Character with the addition of Swallow Brewery, Fitzalan Road/Queens Lane

The saved policies essentially utilise brownfield sites, promotes sustainable travel, protects Local Green Spaces and non-designated heritage assets, and protects itself from further flood risks.

As explained above, part of the Parish also lies within the boundary of the SDNPA and its development plan currently comprises the 'saved policies' of the adopted Arun District Local Plan 2003 and the emerging South Downs Local Plan 2014-2033. The latest version of the plan is the Submission Version published in April 2018 which comprises the Pre-Submission Version September 2017 and the Schedule of Changes April 2018. The following emerging policies are considered especially relevant:

- SD6 Safeguarding views seeks to conserve and enhance key views and views of key landmarks within the National Park.
- SD12 Historic Environment seeks to conserve and enhance the historic environment, including through the safeguarding of heritage assets and their setting.
- SD43 New and existing community facilities supports new and/or expanded community facility infrastructure subject to certain criteria and seeks to prevent the loss of existing facilities.

Prior to the adoption of the new Local Plan, those saved policies of the 2003 Arun Local Plan that relate to the Neighbourhood Area will continue to operate as the Development Plan.

It is noted that, although the submitted Plan acknowledges Arundel as one of a number of key 'gateways' to the National Park, it contains no specific policies for its part of the town.

There are other development plans – waste and minerals for example – that apply in the Parish, but none are considered relevant for analysis of the sustainability effects of this Neighbourhood Plan.

#### Baseline Information (Stage A2)

A summary of the baseline information is attached as Appendix A. There are a number of important social, economic and environmental issues in the Parish, to which the Plan will need to have full regard. The Plan will also have regard to the policy context and most current and comprehensive set of baseline information contained within the Local Plan evidence base.

The Town Council is also mindful that it is very difficult in most cases to measure the impacts at this local scale as the impact is so relatively negligible that it cannot be measured. In which case, the SA/SEA framework will be used to inform judgements on the impact of the proposed policies in relation to any reasonable alternatives there may be.

#### Sustainability Issues (A3)

The planning context and the baseline evidence indicate that the key sustainability issues relate to protecting and enhancing Arundel's renowned historic and cultural character. At present, there is no requirement for major growth, and development over the last few years has primarily utilised brownfield sites. This has not prevented traffic congestion problems, and there remain flood risks, connectivity issues and problems of access to affordable housing. But the main environmental qualities of the Parish have more or less remained undisturbed.

The A27 Bypass project is now further advanced than at the time of the ANP1, with Highways England currently consulting on its preferred route for the scheme to link the dual carriageways east and west of the town. The route, which will swing south of the town and the small settlement of Tortington off Ford Road, will have very significant positive effects for the town in terms of relieving traffic congestion and enabling the re-planning of the current road and junctions.

In terms of managing future development, if sites are to be allocated to secure enhancements for Arundel, then the key sustainability issues are:

#### Flood Risk

- Being able to manage and mitigate against all sources of flooding;
- Continuing to support related infrastructure to help protect homes and businesses and manage flood risk elsewhere.

#### Climate Change

- Increasing demands placed on the Parish's recreation and wildlife areas due to warmer and drier weather patterns;
- Recognition that changes to the climate will bring new challenges to these recreation and wildlife areas due to extended growing seasons, increased vulnerability of some native species and the migration of new species (including the potential for alien introductions);
- Adverse environmental and health impacts associated with increases in air, soil and water pollution from an increase in the local population, made worse by increasing temperatures and less rainfall.

#### Population and Health

- Maintaining an adequate housing supply, incorporating a mix of housing types to meet the needs of the local area;
- The opportunity to increase the number and variety of affordable homes and new types of tenure, e.g. Entry-level Homes and custom-built homes;
- There will be increases in the demand for, as well the operational impacts on, key local services, such as health, education and social care if the local population grows over the plan period;
- The safety of motorists and ability to utilise other transport methods must improve.

#### **Economic Development**

- Desire to make provisions for local jobs growth to maintain the sustainability of the town;
- The opportunity to enhance the vitality and viability of local shops and commercial services.

#### Heritage and Landscape

- Protecting the large number of listed buildings, non-designated heritage assets, the Conservation Area and archaeology in the Parish from harmful development
- Protecting the setting of Arundel from harmful development

#### **Biodiversity**

 Ensuring Priority Habitats/Species and other locally endangered species are protected from destruction by inappropriate development or land management practice.

#### Air quality

- Planning for new development in a way and in locations that may make existing traffic congestion no worse.

#### Assessment Framework (A4)

In the light of the context and available data, the Town Council proposes to establish the following framework of environmental, social and economic objectives and measures in order to identify any likely significant environmental, social and economic effects.

The proposed framework reflects the general sustainability issues of the Town and the likely scope of policies in the ANP2. It has selected these objectives informed by the SA/SEA of the adopted Local Plan and are considered the most relevant and informative for this purpose. Other sustainability objectives and measures have been screened out as relating to either matters outside of the scope of a Neighbourhood Plan (i.e. 'excluded development' like minerals and waste) or matters that the baseline evidence indicates are not material to measuring sustainability in the Parish.

#### Objective 1: Heritage & Local Distinctiveness

To maintain and enhance the nationally important historic character of the town, and the distinctiveness of its built environment by:

- conserving and enhancing areas, sites and buildings that contribute to the natural and cultural (including archaeological and architectural) heritage of the District
- preserving the setting, and avoiding neglect leading to decay, of heritage assets
- promoting access to and enjoyment of the District's historic environment and countryside

#### Objective 2: Landscape Character

To conserve and enhance the special landscape and scenic beauty of the National Park and the distinct character of the Arun Valley by:

- ensuring development causes no harm to the National Park or its setting within and beyond the town
- ensuring development respects the setting of Arundel across the Arun Valley

#### Objective 3: Biodiversity & Climate Change

To conserve and enhance biodiversity and plan for the potential effects of climate change by:

- avoiding loss or damage to existing biodiversity or geodiversity assets
- realising opportunities to enhance and connect those assets
- understanding potential effects of climate change on the town and incorporating measures to adapt to that change

#### Objective 4: Population & Health

To contribute to meeting local housing needs and to encourage a healthy local community by:

 allocating land for a range of housing types and sizes, including affordable to meet the needs of all sectors in the community

- improving accessibility to and enhance local services and facilities to promote healthy lifestyles and wellbeing
- avoiding making local traffic congestion worse and encouraging walking and cycling in the town

#### Objective 5: Economy & Tourism

To maintain a competitive and vibrant local economy and tourism offer by:

- identifying opportunities in land and property available for new business development
- building on the town's tourism strengths in providing for the needs of tourists and visitors
- maintaining a vital and viable town centre retail, commercial and entertainment offer that meets the need of local residents as well as visitors

#### Objective 7: Flood Risk

To reduce the risk from all sources of flooding by:

- avoiding inappropriate development in flood risk areas
- ensuring all new development comprises effective measures to tackle flood risk

#### Statutory Consultation (Stage A5)

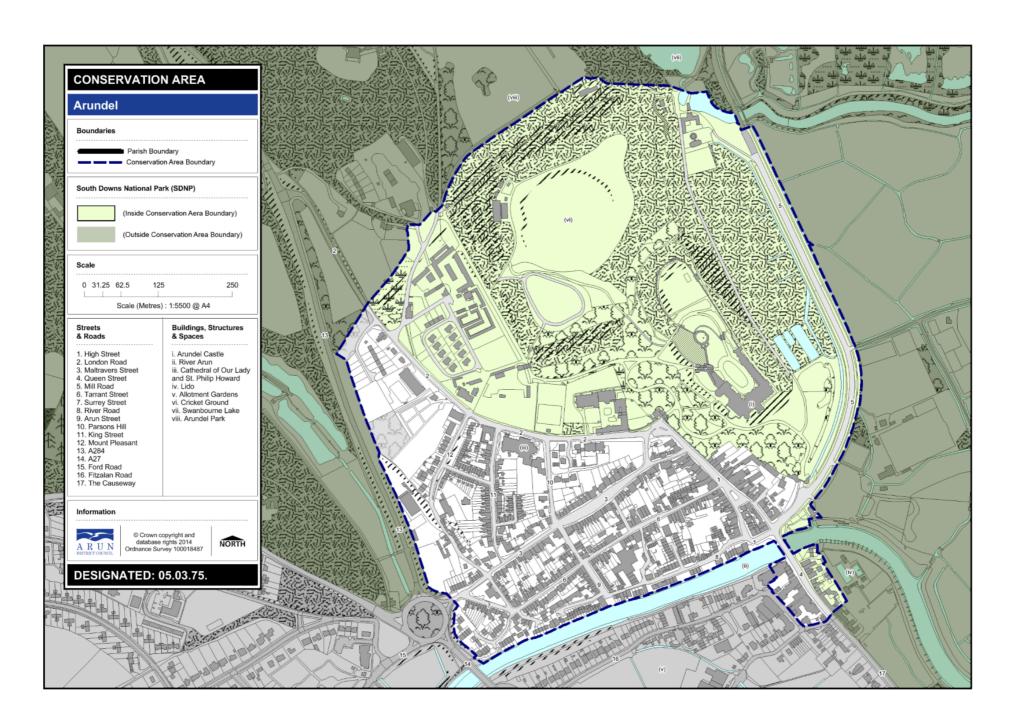
The conclusions of this consultation will be considered by the Town Council in finalising the SA/SEA assessment framework. That framework will then be employed in the Draft SA/SEA report. It is expected that the draft Neighbourhood Plan policies will be formulated and assessed against one or more reasonable alternatives to ensure any significant sustainability effects have been identified and any necessary mitigation measures are included in the policies.

## Appendix A: Baseline data

Title	Source	Data	Trends &
		Population	Consequences
Town Profile	Arun District Council Community Profile for Arundel	Arundel Parish lies in the northern part of the district of Arun in the county of West Sussex and within the South Downs National Park.  The population of Arundel is approximately 3,475 in 1,690 dwellings.	The historical development of Arundel has resulted in a rich built environment set against the impressive backdrop of the River Arun, Arun Valley and Arundel Park.  Any future growth is likely to have environmental consequences for the town which the neighbourhood plan will aim to mitigate.
		Economy	will diff to miligate.
Retail and Employment	2017 Economy and Enterprise Paper for ALP  ALP Strategic Allocation proposals	Identifies Arundel as a smaller centre that provides good range of shops and services to meet local needs and is considered to be a specialist retail destination for services such as restaurants and other leisure activities.  Arundel defined as a medium sized centre with a multiple role: Historic market town and Tourist and Visitor destination and Cultural Centre and is required to provide range of shops and services for local population and tourists and visitors.	Ensuring the vitality of the town centre and identifying employment opportunities in Arundel will be important to sustain future growth.
Listed Buildings	Heritage, Lar Arundel State of Town Report 2012	There are 215 listed buildings and structures (including the Grade I Arundel Castle, Church of St. Nicholas, Fitzalan Chapel and Roman	The renowned historic and cultural character of Arundel has been maintained and listed buildings and structures are well

		Catholic Cathedral of St. Philip Neri and the Grade II* Hiorn's Tower, 22 High Street (Norfolk Hotel), 51 High Street, 61 High Street, The Priory (St. Wilfred's) and 26 Maltravers Street (The Vicarage)).	protected by planning policy. The National Park and its setting has been relatively untouched by development in recent years, but enhancement has been limited.
Conservation Area	Arun District Council  Conservation Areas Supplementary Planning Guidance	Arundel Conservation Area (see plan below). It covers the majority of the town area. There is no Conservation Appraisal, but a description of the Conservation Areas is contained within ADC's Conservation Areas Supplementary Planning Guidance.	The Plan could explore how development in the setting of the National Park could contribute to Arundel's special character, built environment and landscapes.
Landscape Designations	Arun District Council	The northern half of the parish of Arundel falls in the South Downs National Park (see plan A).	
		Air Quality	
Air Quality	2018 Air Quality Annual Status Report	There are locations within the parish that are monitored, and the A27 Arundel bypass is a key measure in addressing Air Quality (see plan below).	A continued low level of NO2 in the District compared to the national trigger level mean that no AQMAs are required within Arun District Council's area. However, road congestion during
	Highways England	The preferred route for the A27 Arundel bypass includes a new dual carriageway between Crossbush in the East and a new junction between Binsted Lane and Yapton in the west, as well as new dedicated paths for cyclists and pedestrians to draw traffic away from Arundel town centre (see preferred	peak periods on the A27 continues to cause poor air quality. Even with the construction of the A27 Arundel Bypass in the future, this could still be under pressure as a result of increased car journeys, congestion, climate change and other factors. The plan could minimise this pressure

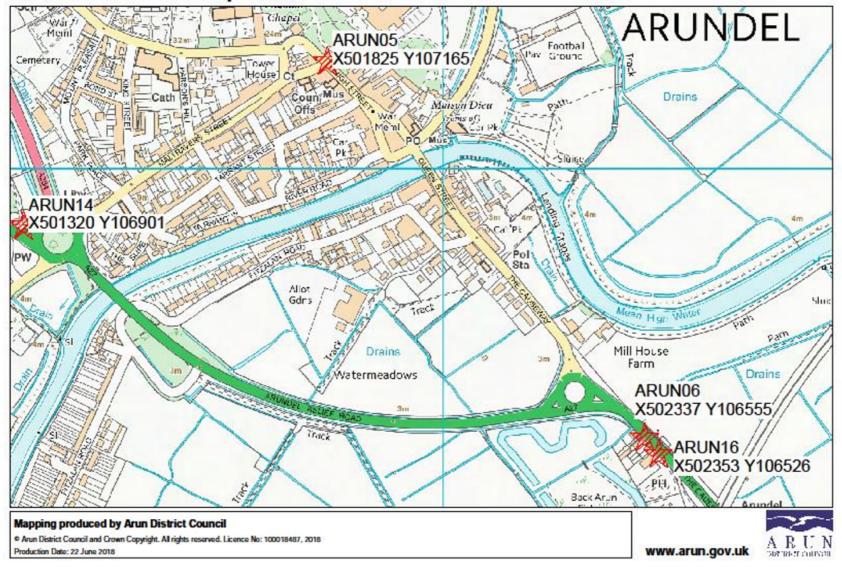
	Piodivorsity 9	Designated Environmenta	development proposals could improve sustainable transport methods.
National or	South Downs	The Parish contains one	Arundel Park SSSI is
Local Designations	National Park (SDNP)	Site of Special Scientific Interest (SSSI) at Arundel Park. There are no local nature reserves, but significant ancient woodland within the SDNP boundary and two West Sussex Sites of Nature Conservation Importance (SNCI) at Rewell Wood and at Binsted Wood. There is also a large Site of Local Importance for Nature Conservation (SINC) within the SDNP boundary (see map below).	one of the most important sites in the country for invertebrates including a number of rare and notable species. The Plan should avoid proposing development in or in close proximity to the SSSI, SNCI's and SINC, but may consider how proposals may add to current habitat connectivity.
		Flooding	
Flooding	Environment Agency	Large parts of Arundel lie within Flood Zone 3, and forms part of proposals by the Environment Agency to undertake flood defence works in the parish over the next twenty years as set out by the Lower Tidal River Arun Strategy (see maps below).	The ANP1 safeguards land for the Strategy and the policy will be saved. The review should continue to ensure appropriate measures are taken in allocating development within flood zones.

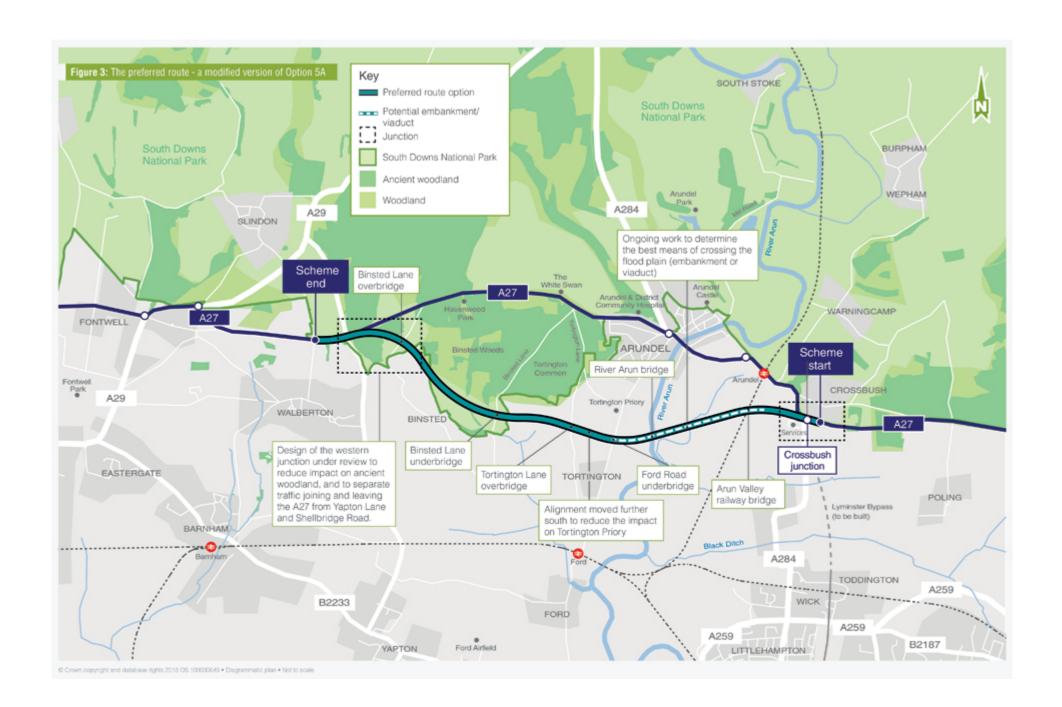


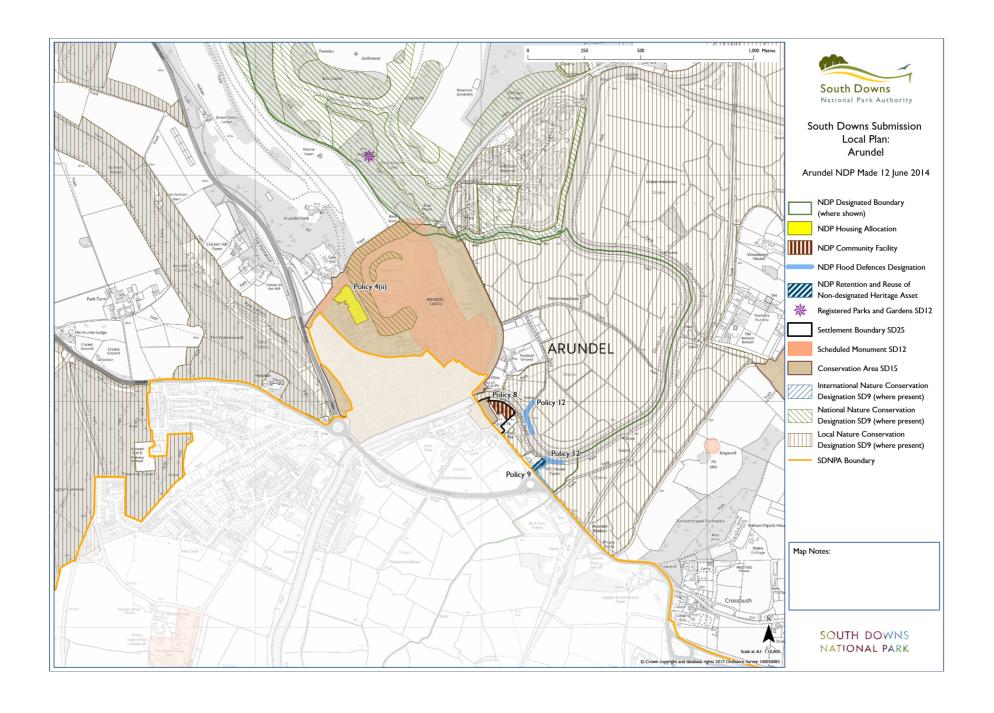
# **Appendix D: Map(s) of Monitoring Locations and AQMAs**

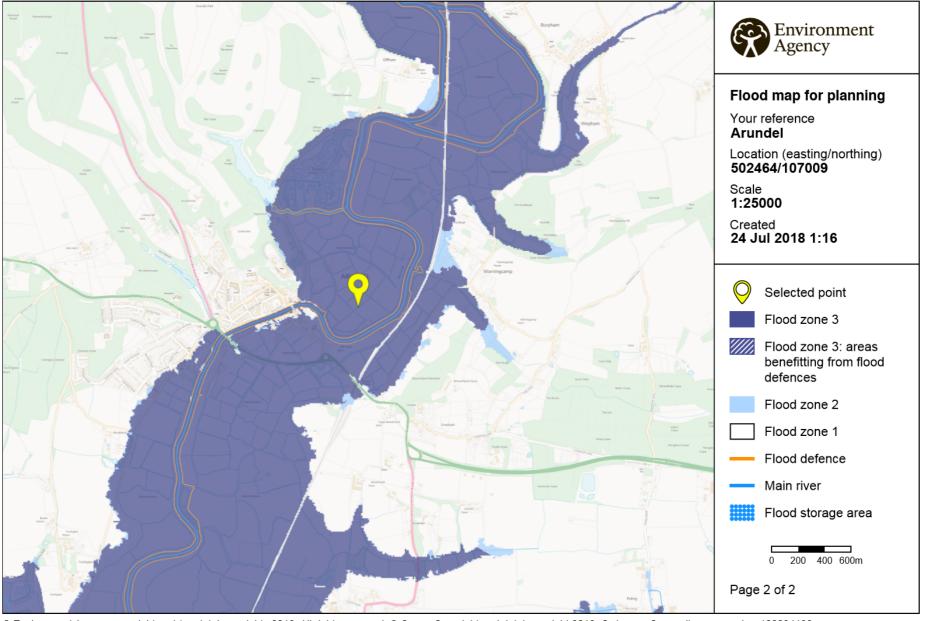
D1: Diffusion Tube Locations 2017 Arundel

## **Arun District Council Maps**









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