



Draft Adur Local Plan 2012
**Habitat Regulations Assessment (HRA) of
Adur Draft Local Plan**

Report
September 2012



Prepared for

Revision Schedule

Habitat Regulations Assessment

September 2012

Rev	Date	Details	Prepared by	Checked by	Approved by
1	August 2012	Draft	Steph Cooling Ecologist	Dr James Riley Principal Ecologist	Dr James Riley Principal Ecologist
2	06/09/12	For consultation	Dr James Riley Principal Ecologist		

**URS Infrastructure and Environment UK
Limited**

Scott House
Alençon Link
Basingstoke
Hampshire
RG21 7PP

Telephone: +44(0)1256 310200

Fax: +44(0)1256 310201

Limitations

URS Infrastructure & Environment UK Limited (“URS”) has prepared this Report for the sole use of Adur District Council (“Client”) in accordance with the Agreement under which our services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by URS. This Report is confidential and may not be disclosed by the Client nor relied upon by any other party without the prior and express written agreement of URS.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by URS has not been independently verified by URS, unless otherwise stated in the Report.

The methodology adopted and the sources of information used by URS in providing its services are outlined in this Report. The work described in this Report was undertaken during August 2012 and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

Where assessments of works or costs identified in this Report are made, such assessments are based upon the information available at the time and where appropriate are subject to further investigations or information which may become available.

URS disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to URS attention after the date of the Report.

Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. URS specifically does not guarantee or warrant any estimate or projections contained in this Report.

Copyright

© This Report is the copyright of URS Ltd. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited.

Table of Contents

1	Introduction	6
1.1	Legislation	6
1.2	Scope and objectives.....	6
2	Methodology.....	8
2.1	Key principles	8
2.2	Process	8
2.3	Screening	9
2.4	Confirming other plans and projects that may act in combination.....	10
3	Pathways of Impacts	11
3.1	Introduction.....	11
3.2	Sites scoped into the screening assessment	15
3.3	Draft Options, Allocations and Policies	17
4	Arun Valley SPA, SAC and Ramsar	18
4.1	Introduction.....	18
4.2	Features of European Interest: SAC	18
4.3	Features of International Interest: Ramsar Criteria.....	18
4.4	Amberley Wild Brooks SSSI	19
4.5	Pulborough Brooks SSSI	20
4.6	Waltham Brook SSSI	20
4.7	Condition Assessment	20
4.8	Key Environmental Conditions.....	20
4.9	Potential Effects of the plan	20
4.10	Other plans and projects.....	21
4.11	Summary	21
5	Lewes Downs SAC	22
5.1	Introduction.....	22
5.2	Features of European Interest	22
5.3	Condition Assessment	22
5.4	Key Environmental Conditions.....	22
5.5	Potential Effects of the plan	22
5.6	Other plans and projects.....	23
5.7	Summary	23
6	Castle Hill SAC	24
6.1	Introduction.....	24
6.2	Features of European Interest	24

6.3	Condition Assessment	24
6.4	Key Environmental Conditions.....	24
6.5	Potential Effects of the plan	24
6.6	Other plans and projects.....	25
6.7	Summary	25
7	Conclusions.....	26
7.1	European sites.....	26
	APPENDIX 1: ‘Tiering’ in habitat regulations Assessment	27
	APPENDIX 2: Local Plan draft policies	28

1 INTRODUCTION

1.1 Legislation

The Habitats Directive and Conservation of Habitats and Species Regulations 2010 apply the precautionary principle to protected areas (Special Areas of Conservation, SACs, Special Protection Areas, SPAs and, as a matter of UK Government policy, Ramsar sites). Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This is in contrast to the SEA Directive which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; it simply says that the assessment findings (as documented in the ‘environmental report’) should be ‘taken into account’ during preparation of the plan or programme. In the case of the Habitats Directive, potentially damaging plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network.

In order to ascertain whether or not site integrity will be affected, an AA should be undertaken of the plan or project in question:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives.”

Article 6(3)

As assessment of plans has developed, the term Habitats Regulations Assessment has come into currency for describing the overall assessment process (including screening) and this term is used below when necessary to distinguish the process from the ‘Appropriate Assessment’ stage itself.

1.2 Scope and objectives

URS has been appointed by the Adur District Council (“the Council”) to assist in undertaking a Habitat Regulations Assessment (HRA) of the potential effects of the Local Development Framework Local Plan on the *Natura 2000* network (i.e. the network of European protected sites). The role of the *Natura 2000* sites (SACs, SPAs, Ramsar) is to provide statutory protection for terrestrial and coastal sites that are of European and global importance as a result of habitats or species contained within them.

Currently, the Local Development Framework (LDF) is at an early stage of development. The core LDF Documents will ultimately consist of:

- Local Plan; and
- Shoreham Harbour Joint Area Action Plan with Brighton & Hove City Council and West Sussex County Council.

This current document covers the Draft Local Plan only. As the subsequent DPDs are produced, the assessment will be refreshed, although this may simply be a case of confirming that the Local Plan HRA remains relevant to those lower tier plans. The LDF will supersede the current Adur Local Plan 1996.

The need for Habitat Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by Regulation 48 of the Conservation (Natural Habitats &c) Regulations 1994 (as amended in 2007) (Box 1). The ultimate aim of the Directive is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*” (Habitats Directive, Article 2(2)). This

aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.

Box 1. The legislative basis for Habitat Regulations Assessment

Habitats Directive 1992

Article 6 (3) states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives.”

Conservation of Habitats and Species Regulations 2010

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives”... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

The first stage of any Habitat Regulations Assessment is a Likely Significant Effect test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

“Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant adverse effect upon European sites?”

If it can be demonstrated that likely significant effects will not occur, no further assessment is required. That is the purpose of this report. If significant effects cannot be ruled out as unlikely, these impacts would be considered further in an Appropriate Assessment and avoidance and mitigation approaches recommended.

Chapter 2 of this report explains the process by which the HRA has been carried out. Chapter 3 explores the relevant pathways of impact resulting from the preferred policy options in the Local Plan. Chapter 4 summarises the Council’s policies and spatial options as presented in these documents; these are listed in detail in Appendix 2.

Chapters 5-9 are organised on the basis of one chapter per European site, except where multiple sites overlap in a particular geographic area (e.g. Arun Valley SPA, SAC and Ramsar sites). Each chapter begins with a consideration of the interest features and ecological condition of the site and environmental process essential to maintain site integrity. An assessment of the Local Plan in respect of each European site is then carried out. The key findings are summarised in Chapter 10: Conclusions.

2 METHODOLOGY

2.1 Key principles

This section sets out the basis of the methodology for the screening stage of the HRA. URS has adhered to several key principles in developing the methodology – see Table 1.

Table 1: Key principles underpinning the proposed methodology

Principle	Rationale
Use existing information	We will use existing information to inform the assessment. This will include information gathered as part of the SA of the emerging Plan and information held by Natural England, the Environment Agency and others.
Consult with Natural England, the Environment Agency and other stakeholders	We will ensure consultation with Natural England. We will ensure that we utilise information held by them and others and take on board their comments on the assessment process and findings.
Ensure a proportionate assessment	We will ensure that the level of detail addressed in the assessment reflects the level of detail in the LDF (i.e. that the assessment is proportionate). With this in mind, the assessment will focus on information and impacts considered appropriate to the local level.
Keep the process simple as possible	We will endeavour to keep the process as simple as possible while ensuring an objective and rigorous assessment in compliance with the Habitats Directive and emerging best practice.
Ensure a clear audit trail	We will ensure that the AA process and findings are clearly documented in order to ensure a clearly discernible audit trail.

2.2 Process

The HRA has been carried out in the absence of formal Government guidance. Communities and Local Government released a consultation paper on Appropriate Assessment of Plans in 2006¹. As yet, no further formal guidance has emerged. The level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be ‘appropriate’ to the level of plan or project that it addresses (see Appendix 1 for a summary of this ‘tiering’ of assessment).

Figure 1 below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

¹ CLG (2006) *Planning for the Protection of European Sites*, Consultation Paper

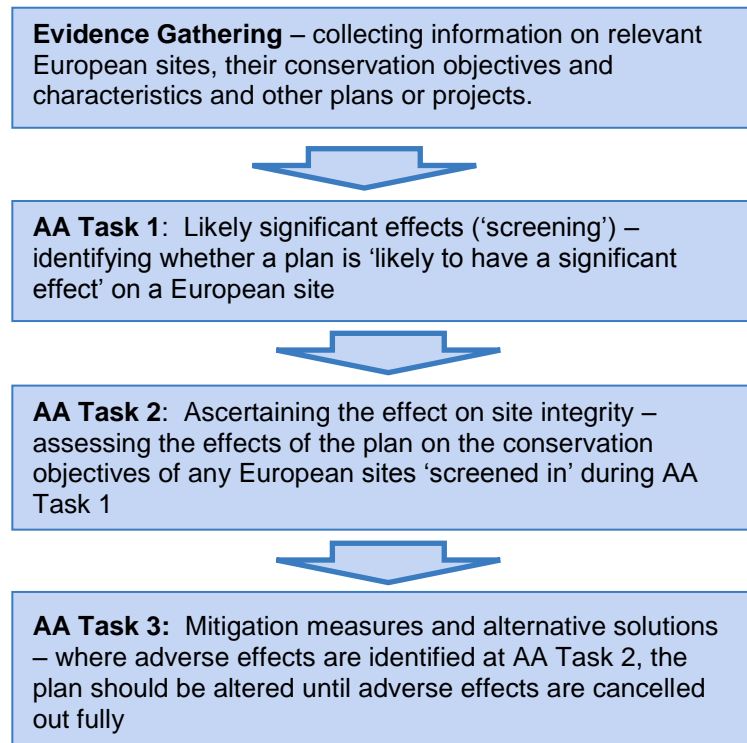


Figure 1: Four-Stage Approach to Habitat Regulations Assessment

Source: CLG, 2006

2.3 Screening

The objective of the screening assessment is to determine whether the plan is likely to have a significant adverse effect upon a European site, or not. Individual policies/measures within the Plan are evaluated in detail against the site’s conservation objectives, considering the environmental conditions necessary to maintain the integrity of the European site.

The steps involved are detailed in Box 1. If significant adverse effects are considered unlikely, the policy can be screened out of the assessment and considered no further.

Box 1. The steps involved in screening a Habitat Regulations Assessment

1. Make a decision as to whether there is any mechanism by which the plan can affect any European site by altering its environmental conditions, focussing on those sites within the administrative boundary or which may be linked to development within the boundary by a pathway.
2. Determine the reasons for the European designation of these sites.
3. Explore the environmental conditions required to maintain the integrity of the selected sites and become familiar with the current trends in these environmental processes.
4. Gain a full understanding of the plan and its policies and consider each policy within the context of the environmental processes – could the policy lead to an impact on any identified process?
5. Decide if the identified impact is likely to lead to a significant effect.
6. Identify other plans and projects that might affect these sites in combination with the Plan and decide whether there is likely to be a significant effect “in combination”. In practice ‘in combination’ assessments are only really necessary if the plan element in question has been screened out when considered in isolation.
7. If Likely Significant Effects have been identified, the HRA must progress to AA Task 2 (Appropriate Assessment), which will involve consideration of mitigation and avoidance measures.

2.4 Confirming other plans and projects that may act in combination

It is neither practical nor necessary to assess the ‘in combination’ effects of the Local Plan within the context of all other plans and projects within West Sussex. In practice therefore, in combination assessment is only really of relevance when the plan would otherwise be screened out because it’s individual contribution is inconsequential. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing and commercial/industrial allocations proposed for other West Sussex and relevant East Sussex authorities over the lifetime of the Local Plan.

Plans and projects relevant to the pathways identified in AA Task 1 have been identified in order to check whether the LDF could cause significant impacts upon European sites in combination with their policies or activities. Potential impacts of the LDF assessed in AA Task 1 and identified pathways have been revisited according to this knowledge in order to identify any likely significant effects that may result in combination with the Local Plan, especially those not previously considered to pose significant risk individually.

3 PATHWAYS OF IMPACTS

3.1 Introduction

One of the first necessary steps for Evidence Gathering is to develop a 'long list' of European sites potentially affected by the plan and this requires an understanding of the various ways in which land use plans can impact on European sites. Current guidance suggests that the following European sites be included in the long list:

- sites within the authority's boundary; and
- sites shown to be linked to development within the authority's boundary through a known 'pathway' (discussed below)

Briefly defined, pathways are routes by which a change in activity within Adur District can lead to an effect upon a European site. In terms of this second category of European site listed above, CLG guidance states that the AA should be 'proportionate to the geographical scope of the [plan policy]' and that 'an AA need not be done in any more detail, or using more resources, than is useful for its purpose' (CLG, 2006, p.62). As a result, the long list is inevitably limited to those Natura 2000 sites for which recommended mitigation or alternatives to LDF policy can contribute significantly towards the protection of those sites and their nature conservation objectives. The following pathways are likely to require consideration.

3.1.1 Urbanisation

This impact is closely related to recreational pressure, in that they both result from increased populations within close proximity to sensitive sites. Urbanisation is considered separately as the detail of the impacts is distinct from the trampling, disturbance and dog-fouling that result specifically from recreational activity. The list of urbanisation impacts can be extensive, but core impacts can be singled out:

- Increased fly-tipping - Rubbish tipping is unsightly but the principle adverse ecological effect of tipping is the introduction of invasive alien species with garden waste. Garden waste results in the introduction of invasive aliens precisely because it is the 'troublesome and over-exuberant' garden plants that are typically thrown out³. Alien species may also be introduced deliberately or may be bird-sown from local gardens.
- Cat predation. A survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period⁴. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation. Turner and Meister (1988) found that the mean range of cats was 371m although the maximum range was 1578m⁵.

Urbanisation effects are considered likely to derive mainly from development and to occur within close proximity of the site. When developing a delivery plan for the Thames Basin Heaths, Natural England identified 400 m from the SPA as the distance within which they felt no new development could be allowed because of the general 'urbanisation' effects (car

² Department for Communities and Local Government. 2006. *Planning for the Protection of European Sites: Appropriate Assessment*. <http://www.communities.gov.uk/index.asp?id=1502244>

³ Gilbert, O. & Bevan, D. 1997. The effect of urbanisation on ancient woodlands. *British Wildlife* 8: 213-218.

⁴ Woods, M. et al. 2003. Predation of wildlife by domestic cats *Felis catus* in Great Britain. *Mammal Review* 33, 2 174-188.

⁵ Turner, Dennis C.; Meister, Othmar. 1988. Hunting behaviour of the domestic cat. Chapter 9 in *THE DOMESTIC CAT: THE BIOLOGY OF ITS BEHAVIOUR* (D.C. Turner & P. Bateson (Eds). Cambridge: Cambridge University Press. pp.111-121

dumping, noise, cats etc) that would be experienced by the SPA. However, this zone was calculated to relate to a specific European site – to allow for some uncertainty in applying this to other sites and in line with the precautionary principle, we have expanded that buffer to 500m. This does not mean that all sites will automatically be adversely affected by development situated within this zone, but does form a convenient indicator of when general urbanisation issues require consideration.

3.1.2 Impacts on surrounding habitat

For some European sites, particularly those designated for their ornithological or bat interest, development of land close to but outside the boundaries of the sites can still lead to a significant adverse effect on integrity. A good example of this concerns Chichester & Langstone Harbours SPA, at which the surrounding pasture outside the SPA is of crucial importance for high-tide foraging and roosting by the Brent geese population for which the site was designated. Loss of significant amounts of this habitat could therefore have a significant adverse impact on the interest features of the SPA without physically affecting the SPA at all.

Equally, if the important surrounding habitats are subject to considerably increased levels of disturbance this can effectively render them unavailable to the species that rely upon them (depending upon the sensitivity of those species). No evidence has been found within the district of Adur of habitats supporting the Bewick's Swan (*Cygnus columbianus bewickii*).

3.1.3 Recreational causes

All types of terrestrial European site, including chalk grassland, can be affected by trampling, which in turn causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths. Motorcycle scrambling and off-road vehicle use can cause more serious erosion, as well as disturbance to sensitive species.

Activities of walkers (particularly dog walkers) and water-borne recreation can, if carried out in winter, have a significant disturbing effect upon wintering waterfowl thus increasing energetic expenditure (as birds have to take flight more frequently).⁶

3.1.4 Visitor catchments

For the vast majority of European sites within Adur site-specific data does not yet exist that enables us to obtain precise data on the visitor catchments of these sites (and therefore the zone around the site within which a significant population increase may cause a significant change in visitor numbers). However, over the past four years a series of visitor surveys of European sites in other parts of England have been undertaken. These cover a range of European sites in various situations:

- Thames Basin Heaths SPA – The Thames Basin Heaths occur in one of the most densely populated parts of the UK, and attract an estimated 5.36 million visitors per annum to the SPA, 4.45 million of whom arrive by car. Research (Liley, Jackson & Underhill-Day, 2005) established that 100% of visitors on foot, 93% of people arriving by bicycle and 70% of people arriving by car derived from within 5km of the SPA. Beyond 5km visitor origins became notably more dispersed. On this basis, 5km was used as the definition of the core catchment of the site;
- Solent Maritime SAC and overlapping Special Protection Areas – Data on visitor activity in the Solent complex was obtained through

⁶ West, A.D., et al. 2002. Predicting the impacts of disturbance on shorebird mortality using a behaviour-based model. *Biological Conservation* 106:3, 319-328

the Solent Disturbance and Mitigation Project³. Terrestrial (rather than water-based) visitors undertook a wide range of activities, with walking (without a dog) and dog walking the two most frequently recorded activities. Taking the data for non-holiday makers only, visitors were roughly evenly divided between those who arrived by car and those who arrived on foot. Ninety percent of all visitors arriving on foot lived within 2km. Almost eighty percent of all visitors arriving by car (excluding holiday makers) lived within 10km, with 50% living within 4km. In other words, approximately 70% of local resident visitors to the Solent estuarine sites (irrespective of mode of transport) lived within 4km.

- Lydden and Temple Ewell Downs SAC – Data on Lydden and Temple Ewell Downs SAC collected through a 2010 visitor survey by Aspect Ecology demonstrate that the number of people currently using the SAC is small constituting an average of approximately 50 people per day. The visitor survey identified that approximately 75% of visitors live within 4km of the site (50% from within 2km and 25% from between 2km and 4km away). Over 70% of visitors use the site more than once a week. The main reason that they visited the SAC was for dog walking and two thirds of respondents commented that the reason they came to this site rather than any other was due to the close proximity to their home and the lack of any alternative sites within walking distance of home.
- Dover to Kingsdown Cliffs SAC – Data made available by Dover District Council and The National Trust identifies that approximately 78% of 'local' visitors (as opposed to tourists) live within 5km of the SAC.
- Oxford Meadows SAC – A survey undertaken during October 2011 by Oxford City Council to inform the Oxford Sites and Housing DPD identified that over 80% of visitors to the SAC live within 5km of the site.
- Ashdown Forest SAC – Visitor surveys by Footprint Ecology and others have identified a core recreational catchment for this site of 7km.

These will be used where most appropriate when considering the potential for disturbance of sensitive wildlife as a result of the population increase in Adur District from the potential 2,835-3,685 new homes proposed in the Draft Adur Local Plan, subject to whether Housing Target A or B is selected.

3.1.5 Atmospheric pollution

Current levels of understanding of air quality effects on semi-natural habitats are not adequate to allow a rigorous assessment of the potential for adverse impacts on the integrity of key European sites.

The main pollutants of concern for European sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂). NO_x can have a directly toxic effect upon vegetation. In addition, greater NO_x or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have

³ Stillman, R. A., West, A. D., Clarke, R. T. & Liley, D. (2012) Solent Disturbance and Mitigation Project Phase II: Predicting the impact of human disturbance on overwintering birds in the Solent. Report to the Solent Forum

a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats, such as the calcareous grasslands found within the district. Sulphur dioxide deposition can lead to acidification of calcareous or mesotrophic habitats and thus a change in their species composition away from calcicolous plant species and towards those which are more typical of acidic habitats.

Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with Local Development Frameworks. NOx emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). Within a 'typical' housing development, by far the largest contribution to NOx (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison¹⁰. Emissions of NOx could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the LDF.

According to the World Health Organisation, the critical NOx concentration (critical threshold) for the protection of vegetation is 30 µgm⁻³; the threshold for sulphur dioxide is 20 µgm⁻³. In addition, ecological studies have determined 'critical loads'¹¹ of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH₃). According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant*"¹².

3.1.6 Diffuse air pollution

In July 2006, Natural England advised Runnymede Borough Council that their Local Development Framework '*can only be concerned with locally emitted and short range locally acting pollutants*'.¹³ Runnymede Council had previously suggested that as many European habitats are currently in unfavourable condition (partly) as a consequence of air pollution, then any development that resulted in any increase in pollution (taken at its extreme as only one more car journey) would be an adverse effect.

The implication of Natural England's advice is that any long-range contribution made to 'background' concentrations of NOx or other atmospheric pollutants by the development set out in the LDF, is outside the remit of the HRA for the LDF. The issue of 'long-range' pollution will therefore not be considered within this HRA.

3.1.7 Water resources

The South East has experienced low rainfall for most of the last few years, including dry winters. Expected climate change trends for the South East are for drier summers, wetter winters, and more extreme events. If the current climate trends continue, it may be impractical in the longer term to preserve wetland habitats characteristic of our former climate but in the short and medium term, it is clear that strenuous efforts to reduce the risk of water stress in European wetland sites should be a priority.

Southern Water is the Public Water Supply provider for Adur. The Company currently obtains 70% of its public water supply from groundwater; predominantly chalk aquifer's which is widespread across the region. A further 23 % comes from rivers and the remaining 7% from surface water reservoirs owned by Southern water.

¹⁰ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory.
<http://www.airquality.co.uk/archive/index.php>

¹¹ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

¹² www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf

¹³ English Nature (16 May 2006) letter to Runnymede Borough Council, 'Conservation (Natural Habitats &c.) Regulations 1994, Runnymede Borough Council Local Development Framework'

3.1.8 Water quality

Increased amounts of housing or business development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on European sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has been identified during an Environment Agency Review of Consents process, as being a major factor in causing unfavourable condition of European sites.

The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen.

Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

For sewage treatment works close to capacity, further development may increase the risk of effluent escape into aquatic environments. In many urban areas, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk.

Increased discharge of treated sewage effluent, can result both in greater scour (as a result of greater flow volumes) and in high levels of macroalgal growth, which can smother mudflats of value to SPA birds.

3.2 Sites scoped into the screening assessment

No European sites lie wholly or partly within the Adur District boundary and the nearest European site (Castle Hill SAC) lies over 10km distant. Nonetheless for completeness we have undertaken a consideration of the potential for likely significant effects on the three European sites that lie closest to Arun District, giving consideration to the potential pathways described earlier in this chapter:

- Arun Valley SPA, SAC and Ramsar, located approximately 12km to the northwest of the district;
- Lewes Downs SAC, located approximately 18km to the north-east of the district; and
- Castle Hill SAC, located approximately 11km to the northeast of the district.

In a previous round of HRA screening in October 2009 undertaken by WSP, several further sites (Ashdown Forest SPA/SAC, Pevensey Levels Ramsar, The Mens SAC and Duncton to Bignor Escarpment SAC) were also considered. However, these have not been subject to further consideration in this report for the following reasons:

- Ashdown Forest SPA/SAC – Adur district is located 24km from Ashdown Forest SAC/SPA at its closest. Ashdown Forest is primarily sensitive to recreational pressure and air quality impacts. Detailed studies have been undertaken over the past three years

into recreational activity within Ashdown Forest and the sources of visitors. These studies are documented in reports by Footprint Ecology and others⁴. The East Sussex local authorities, particularly Mid-Sussex and Wealden, in conjunction with Natural England, have worked to develop a strategy for addressing recreational impacts on the SAC/SPA. Adur has not been identified as being a participatory authority, largely because the core catchment of the SAC/SPA is 7km. Studies into the transport and air quality impacts of development upon Ashdown Forest have also been coordinated by Natural England. This has been documented in a series of reports produced to inform the Habitat Regulations Assessments of the Mid-Sussex District Plan⁵ and the Wealden Core Strategy⁶. The reports indicate that regular vehicle movements through the Forest are dominated by residents of the settlements of Forest Row, Uckfield, Maresfield, Crowborough and to a lesser extent East Grinstead, with the remainder being more dispersed over the surrounding rural area.

- Pevensy Levels Ramsar site – Adur district is located 35km from Pevensy Levels Ramsar site. Pevensy Levels Ramsar site is primarily vulnerable to water quality impacts relating to STW discharge and air quality impacts. However, none of the Sewage Treatment Works that discharge to tributaries of the Ramsar site serve Adur and transport/air quality analysis undertaken for Core Strategies located considerably closer to the Ramsar site than Adur have identified no likely significant effect due to air quality. Therefore no further consideration is required.
- The Mens SAC – Adur district is located 17km from this SAC at its closest. The barbastelles of The Mens SAC forage to the east of the SAC, principally on the floodplain of the River Arun from close to Horsham in the north to Parham in the south. They also cross to the Adur floodplain. In some cases the bats travelled up to 7km to visit foraging areas⁷. No tracking data indicates that important foraging habitat lies further afield. There has been less study of the Bechstein bat populations. However, those radio-tracking projects which have been implemented for the species have established that the tracked individuals generally remained within approximately 1.5 km of their roosts⁸. It can safely be concluded therefore that Adur lies well outside the core supporting habitat areas for this site;

⁴ Clarke RT, Sharp J & Liley D. 2010. Ashdown Forest Visitor Survey Data Analysis (Natural England Commissioned Reports, Number 048)

UE Associates and University of Brighton. 2009. Visitor Access Patterns on the Ashdown Forest: Recreational Use and Nature Conservation

⁵ UE Associates. 2008. Habitats Regulations Assessment for the Mid Sussex District Council Core Strategy: Mid Sussex Air Quality Baseline Study

⁶ East Sussex County Council and Wealden District Council. February 2011. The assessment of the increase in traffic resulting from the Wealden District Proposed Submission Core Strategy on The Ashdown Forest Special Area of Conservation and The Lewes Downs Special Area of Conservation

⁷Greenaway, F. (2004) Advice for the management of flightlines and foraging habitats of the barbastelle bat *Barbastellus barbastellus*. English Nature Research Report, Number 657.

Greenaway, F. (2008) Barbastelle bats in the Sussex West Weald 1997 - 2008

⁸ Cited in: Schofield H & Morris C. 2000. 'Ranging Behaviour and Habitat Preferences of Female Bechstein's Bats in Summer'. Vincent Wildlife Trust

- Duncton to Bignor Escarpment SAC – Adur district is located 16km from this SAC at its closest. This is well outside the realistic recreational catchment for this SAC.

3.3 Draft Options, Allocations and Policies

In order to evaluate potential impacts of the Draft Local Plan upon European sites, it is essential to gain a full understanding of the document. The Local Plan seeks to establish the overall spatial strategy for the district, including the total quantum of development and its location. It includes site specific, place based and development management policies. The document sets out the Council's draft policies and housing options and indicates the processes by which these options have been developed. For the purposes of this document, we have listed the Council's draft policies in Appendix 2. It should be noted that the proposal for up to 10,000 dwellings at Shoreham Harbour is no longer being considered following a significant amount of work which showed this level of housing to be unviable and unrealistic. A significantly reduced scheme is currently being considered which would deliver 1200 to 1600 new homes within the Shoreham Harbour area within Adur. The regeneration of Shoreham Harbour will be explored further through a Joint Area Action Plan to be prepared by Adur District Council, Brighton & Hove City Council and West Sussex County Council.

All draft policies within the Draft Local Plan were scoped for potential conflicts with European sites. This scoping exercise is contained in Appendix 2. Impact pathways are discussed in more detail in the following Chapters.

4 ARUN VALLEY SPA, SAC AND RAMSAR

4.1 Introduction

Arun Valley SPA covers 528.62ha of west Sussex, with 95% of the site comprising of mesophile grassland, 2% inland water bodies, 2% Bog, marshes, water fringed vegetation, fens and 1% broad leaved deciduous woodland. The site comprises of low-lying grazing marsh, largely on alluvial soils, but with an area of peat derived from a relict raised bog. Southern parts of the Arun Valley are fed by calcareous springs, while to the north, where the underlying geology is Greensand, where the water is more acidic. These water bodies support internationally important numbers of Bewick’s Swan.

Arun Valley SPA consists of three Site of Special Scientific Importance; Amberley Wild Brooks SSSI, Pulborough Brooks SSSI and Waltham Brooks SSSI. Together these sites comprise an area of wet meadows on the floodplain of the River Arun between Pulborough and Amberley.

The site was designated as being of European importance for the following interest feature:

- Bewick’s Swan *Cygnus columbianus bewickii*, 115 individuals representing at least 1.6% of the wintering population in Great Britain (5 year peak mean for 1992/93 to 1996/7)

The birds that winter on many Special Protected Areas (the Arun Valley being no exception) are not confined to the boundaries of the SPA, but in fact utilise areas of ‘supporting habits’ located outside of the boundaries and sometimes many kilometres distant.

4.2 Features of European Interest: SAC

The site was designated as being of European importance for the following interest feature:

- Ramshorn snail (*Anisus vaticulus*), once a species covering over 15 sites in the south east of England, now only remains in a few select locations as a result a massive decline has occurred. Arun Valley is one of the few remaining site in the UK to support this particular species.

4.3 Features of International Interest: Ramsar Criteria

The Arun Valley Ramsar site qualifies on threes of the nine Ramsar criteria (Table 1)

Ramsar criterion	Description of Criterion	River Arun and marshes
2	A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities.	The site supports seven wetland invertebrate species listed in the British Red Book and the endangered <i>Pseudamnicola confuse</i> (swollen spire snail). As well as four nationally rare and four nationally scarce plant species.
3	A wetland should be considered internationally important if it supports populations of plant and/or animal species important for maintaining the biological diversity of a particular biogeographic region	Within the ditches intersecting the site there are all five British duckweed <i>Lemna</i> species, all five water-cress <i>Rorippa</i> species, and all three British water milfoils (<i>Myriophyllum</i> species), all but one of the seven British water dropworts (<i>Oenanthe</i> species), and two-thirds of the British pondweeds (<i>Potamogeton</i> species).
5	A wetland should be considered internationally important if it regularly supports 20,000 or more	Species with peak counts in winter: • 13774 waterfowl (5 year peak mean

Ramsar criterion	Description of Criterion	River Arun and marshes
	waterbirds.	<p>1998/99-2002/2003)</p> <p>Species identified subsequent to designation for possible future consideration:</p> <ul style="list-style-type: none"> • Northern pintail , <i>Anas acuta</i>, NW Europe 641 individuals, representing an average of 1% of the population (5 year peak mean 1998/9- 2002/3) <p>Species currently occurring at levels of national importance:</p> <ul style="list-style-type: none"> • Eurasian wigeon , <i>Anas penelope</i>, NW Europe 4742 individuals, representing an average of 1.1% of the GB population (5 year peak mean 1998/9-2002/3) • Eurasian teal , <i>Anas crecca</i>, NW Europe 2931 individuals, representing an average of 1.5% of the GB population (5 year peak mean 1998/9-2002/3) • Northern shoveler , <i>Anas clypeata</i>, NW & C Europe 222 individuals, representing an average of 1.5% of the GB population (5 year peak mean 1998/9- 2002/3) • Ruff , <i>Philomachus pugnax</i>, Europe/W Africa 27 individuals, representing an average of 3.8% of the GB population (5 year peak mean 1998/9-2002/3).

The Arun Valley SPA and Ramsar and SAC site comprises of three SSSIs. The closest to Adur is the Amberley Wild Brooks SSSI.

4.4 Amberley Wild Brooks SSSI

The Amberley Wild Brooks SSSI lies within the greensand natural area and covers approximately 322.6ha. The site is supports and extensive area of alluvial grazing marsh which is dissected by draining ditches supporting over 156 flowering plants. This part of the Arun valley flood each year making it a haven for breeding birds. This site is managed by the RSPB but unlike many other RSPB reserves, recreational visitors are not encouraged because of the sensitivity of the site, and the site is not designed or promoted to attract visitors. Access within the site is severely restricted specifically in order to ensure that disturbance is not possible. Access is therefore restricted to the Wey South Path.

Over-wintering birds are of international importance, with a rich community of breeding birds and several uncommon invertebrate assemblages. These ditches support a range of rich flora which includes one nationally rare plan the cut grass *Leersia oryzoides* which is currently restricted to only ten UK locations. The marsh fern *Thelypteris thelypteroides* an uncommon plant is found within the fen. Where this fen is situated two rare snails (molluscs): *Anisus vorticulatus* and *Pseudamnicola confuse* can be found.

4.5 Pulborough Brooks SSSI

A large part of the site is now managed as an area of wet grassland principally for the benefit of breeding waders and internationally important assemblages of wintering wildfowl. Controlled flooding of this part of the valley during the winter attracts large flocks of nationally and internationally important numbers of Bewick’s swan, wigeon, teal, pintail, shoveler and ruff. Other wintering species of note include white-fronted goose, golden plover, snipe and large flocks of lapwing.

4.6 Waltham Brook SSSI

Waltham Brook SSSI is situated the other side of the river to that of Amberley Wild brooks SSSI. Like Amberly Wild Brook the site lies within the greensand natural area and covers approximately 47.39ha. The site is comprised of alluvial grazing marsh which is dissected by draining ditches supporting species-rich community of aquatic plants.

This part of the Arun Valley floods almost every winter, resulting in the site becoming a giant lake. This site is patricianly important for wildfowl such as teal, shoveler, wigeon and pintail then take advantage of the sanctuary and feeding opportunities offered.

4.7 Condition Assessment

During the most recent condition assessment process, 100% of Amberley Wild Brooks SSSI, and Pulborough brooks SSSI were judged to be meeting PSA targets. Waltham Brook SSSI was assessed as being 100% unfavourable condition but recovering. The Arun Valley SPA, Ramsar and SAC were judged to be in favourable condition.

4.8 Key Environmental Conditions

The following key environmental conditions were identified for this site:

- Sympathetic management
- Managed grazing regimes
- Control of fertilizers
- Hydrology management
- Unpolluted water
- Absence of nutrient enrichment
- Controlled recreational activity

4.9 Potential Effects of the plan

4.9.1 Urbanisation

The Local Plan is not anticipated to cause any adverse urbanisation effects on this European site as no development shall occur within 10km of the site.

4.9.2 Recreation

All types of terrestrial; European sites, including hay meadows can be affected by trampling, which in turn causes erosion. The SPA, SAC and Ramsar lie approximately 12km from the north western boundary of Adur Borough District. The actual areas indicated for housing and regeneration at the west of the borough as indicated in the Local plan are situated 15km from the closest part of the SPA, SAC and Ramsar site; moreover, that area is Amberley Wild Brooks where public access is severely restricted; the nearest part of the SPA/SAC/Ramsar site with less restricted access is Pulborough Brooks SSSI over 16km distant. This is well beyond the core catchment distance of 4-5km identified most frequently in visitor surveys of European sites of different types of situation and habitat in the South East . Allowing for the fact that the actual core catchment of Arun Valley may be larger than 5km, the development

areas of Adur are situated sufficiently far from the most vulnerable parts of the SAC/SPA/Ramsar site (16km) that it is considered highly probable that areas proposed for regeneration and housing in Adur will lie outside the core recreational catchment for this site and that a likely significant effect would not occur.

4.9.3 Atmospheric pollution

Minimal air pollution is considered to be a key environmental condition in supporting the favourable status of the SPA, SAC and Ramsar. According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution level is not significant*"⁹. Although the SPA, SAC and Ramsar lies close to the A283 and the A29, there is no point where it lies within 200m. Therefore traffic movements on the A283 and A29 (the nearest major road) are unlikely to contribute to significant local nitrogen deposition effects within the Arun Valley, even if they did increase as a result of increased traffic from Adur, which is itself unlikely given the large distances separating the site from the district.

4.9.4 Water resources

As the public water supply abstractions for Adur are currently obtained from the chalk at Sompting, Southover, Newmarket, Falmer, Patcham, Shoreham, Goldstone Hove, Housedean, Mossy Bottom and Stanhope Lodge, increases in demand for water supply that could result from policies promoting housing and employment development are not likely to have a significant effect on the Arun Valley SPA, SAC and Ramsar due to being positioned in a different catchment area.

4.9.5 Water quality

Arun Valley lies upstream of Adur district and the River Adur. The Arun Valley SPA, SAC and Ramsar is non-tidal and lies 12km upstream and therefore discharges from Sewage Treatment Works within Adur district will have no likely significant effects on the SPA, SAC and Ramsar site.

4.10 **Other plans and projects**

The principal other plans and projects of relevance to development around the Arun Valley SAC/SPA/Ramsar site are the Local Plans for Horsham and to a lesser extent Arun and Chichester districts, which between them intend to deliver approximately 30,000 dwellings over the Local Plan period. However, the HRA for the Arun Core Strategy concluded that no significant recreational impact on the SAC/SPA/Ramsar site would occur, the Horsham Core Strategy HRA scoped out recreational pressure as an impact pathway and housing within Chichester will be focussed on Chichester town which is over 15km from Arun Valley. In any case, since no pathway connecting development in Adur to this European site has been identified there will be no 'in combination' effect.

4.11 **Summary**

Issues of urbanisation, recreational pressure, atmospheric air pollution, water resources and water quality have all been considered in relation to impact of the Local Plan on Arun Valley SPA, SAC and Ramsar. At this stage, we are able to screen out the Local Plan entirely as being unlikely to lead to significant adverse effects on this European site.

⁹ www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf

5 LEWES DOWNS SAC

5.1 Introduction

Lewes Downs SAC covers 146.86ha of east Sussex, with 85% Dry grassland Steeps, 5% Heath. Scrub. Maquis and garrigue. Phygrana, 5% Humid grassland, 5% Mesophile grassland and 5% Improved grassland. The site comprises mainly of Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*) which is considered to be one of the best habitats in the UK, this particular habitat is particularly important for orchid species. The site is a National Nature Reserve managed by the landowner under a management agreement.

5.2 Features of European Interest

The site was designated as being of European importance for the following interest feature:

- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*) This site contains an important assemblage of rare and scarce orchids, including early spider-orchid *Ophrys sphegodes*, burnt orchid *Orchis ustulata* and musk orchid *Herminium monorchis*. The colony of burnt orchid is one of the largest in the UK.

5.3 Condition Assessment

During the most recent condition assessment process, 95.32% of the site is in favourable conditions, 1.8% of the site is unfavourable recovering and 2.88% is unfavourable declining. Unfavourable conditions created due to unsuitable grazing regimes across the site and lack of vegetation removal allowing tussock grasses to become dominant, and siltation to occur within the ditches resulting in a loss of plant diversity.

5.4 Key Environmental Conditions

The following key environmental conditions were identified for this site:

- Controlled encroachment of scrub
- Maintenance of grazing regimes
- Avoidance of heavy poaching
- Periodic fertilisation of field with manure
- Ditch clearance
- Absence of nutrient enrichment
- Controlled recreational activity
- Absence of non-native species
- Controlled water quality
- Good air quality

5.5 Potential Effects of the plan

5.5.1 Urbanisation

The Local Plan is not anticipated to cause any adverse urbanisation effects on this European site as no development shall occur within 500m of the site.

5.5.2 Recreation

All types of terrestrial; European sites, including chalk grasslands can be affected by trampling, which in turn causes erosion. The SAC lie approximately 18km from the north eastern boundary of Adur District. The areas indicated for housing and regeneration at the west of the borough of the Local Plan are situated more than 22km from the SAC. No visitor survey data for this SAC could be traced; however visitor surveys have been undertaken on other areas of internationally important chalk escarpment or downland in the south-east, within a similar setting; Lydden to Temple Ewell Downs SAC has been identified as having a core catchment of 5km, while ongoing visitor surveys from Folkestone to Etchinghill Escarpment SAC appear to indicate a similarly restricted catchment¹⁰. Given the similar setting, interest features and regional location it is considered that these surveys do provide broadly useful proxy data for Lewes Downs SAC although they cannot be transferred precisely. The development areas within Adur lie well beyond 4km from the SAC, and even well beyond 10km. As such, it is considered highly unlikely that Adur lies within the core catchment of this SAC.

5.5.3 Atmospheric pollution

The A26 passes alongside the SAC. As such, increased nitrogen deposition from deteriorating local air quality would impact upon the SAC. However as all of the proposed development is at a distance approximately 22km from the SAC or greater, it is deemed unlikely that it would result in significant adverse effect as traffic originating from Adur will have dispersed long before the SAC is reached.

5.5.4 Water resources

As the public water supply abstractions for Adur are currently obtained from the chalk at Sompington, Southover, Newmarket, Falmer, Patcham, Shoreham, Goldstone Hove, Housedean, Mossy Bottom and Stanhope Lodge, increases in demand for water supply that could result from policies promoting housing and employment development are not likely to have a significant effect on the Lewes Downs SAC.

Lewes Downs SAC is not designated for features that are sensitive to water resources. As stated in the Adur and Ouse Catchment Abstraction management Strategy (2007):

“The sites identified in the CAMS area however, do not have feature that are impacted by water resources activities. These “dry” Habitat Regulation designated sites are very important to the local environment, but there is no direct linkage to the CAMS work”.

5.5.5 Water quality

Lewes Downs SAC is not designated for features that are sensitive to water quality. Therefore issues relating to water quality as a result of development within Adur will have no significant effect on Lewes Downs.

5.6 Other plans and projects

The principal other plans and projects of relevance to development around the Lewes Downs SAC is the Core Strategy for Lewes. An HRA screening exercise for that Core Strategy screened out recreational pressure on Lewes Downs SAC. In any case, since no pathway connecting development in Adur to this European site has been identified there will be no ‘in combination’ effect.

5.7 Summary

Issues of urbanisation, recreational pressure, atmospheric air pollution, water resources and water quality have all been considered in relation to impact of the Local Plan on Lewes Downs SAC. At this stage, we are able to screen out the Local Plan entirely as being unlikely to lead to significant adverse effects on this European site.

¹⁰ David Illsley, Shepway District Council, personal communication

6 CASTLE HILL SAC

6.1 Introduction

Castle Hill SAC is situated in Brighton and Hove; East Sussex and covers approximately 114.68ha, with 90% of the site consisting of semi-natural dry grassland and scrubland facies, 5% Heath. Scrub. Maquis and garrigue. Phygrana, and 5% Humid grassland. Mesophile grassland. The site comprises mainly of Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*) which is considered to be one of the best habitats in the UK, this particular habitat is particular important for orchid species. Early gentian (*Gentianella anglica*) which is listed as a nationally scarce species is considered to support a significant presence on this site. The site is a National Nature reserve lease to English Nature from the local authority.

6.2 Features of European Interest

The site was designated as being of European importance for the following interest feature:

- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*)
- Early gentian (*Gentianella anglica*) classified as nationally scarce species.

6.3 Condition Assessment

During the most recent condition assessment process, 100% of the site is classified as having favourable conditions and meeting PSA targets. The site has the occurrence of many positive indicator species at good levels such as *Brachypodium pinnatum* which is abundant in places but is generally confined to the terraces which are interspersed with short, species-rich turf. Current grazing levels seem appropriate; grasses are not outcompeting the herbs and sward height is within suitable levels.

6.4 Key Environmental Conditions

The following key environmental conditions were identified for this site:

- Controlled encroachment of scrub
- Maintenance of grazing regimes
- Absence of nutrient enrichment
- Controlled recreational activity
- Absence of non-native species
- Good air quality

6.5 Potential Effects of the plan

6.5.1 Urbanisation

The Local Plan is not anticipated to cause any adverse urbanisation effects on this European site as no development shall occur within 500m of the site.

6.5.2 Recreation

All types of terrestrial; European sites, including chalk grasslands can be affected by trampling, which in turn causes erosion. The SAC lie approximately 11km from the north eastern boundary of Adur Borough District. The areas indicated for housing and regeneration at the west of the borough in the Local Plan are situated more than 16km from the SAC. No visitor survey data for this SAC could be traced; however visitor surveys have been

undertaken on other areas of internationally important chalk escarpment or downland in the south-east, within a similar setting; Lydden to Temple Ewell Downs SAC has been identified as having a core catchment of 5km, while ongoing visitor surveys from Folkestone to Etchinghill Escarpment SAC appear to indicate a similarly restricted catchment¹¹. Given the similar setting, interest features and regional location it is considered that these surveys do provide broadly useful proxy data for Lewes Downs SAC although they cannot be transferred precisely. The development areas within Adur lie well beyond 4km from the SAC, and even well beyond 10km. As such, it is considered highly unlikely that Adur lies within the core catchment of this SAC.

6.5.3 Atmospheric pollution

Minimal air pollution is considered to be a key environmental condition in supporting the favourable status of the SAC. According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution level is not significant*"³². Although the SAC, lies close to the A27 and the B2123, there is no point where it lies within 200m. Therefore traffic movements on the A27 and B2123 (the nearest major road) are unlikely to contribute to significant local nitrogen deposition effects within the SAC, even if they did increase as a result of increased traffic from Adur. Moreover, given the distances involved, traffic originating from Adur will have dispersed long before the SAC is reached.

6.5.4 Water resources

As the public water supply abstractions for Adur are currently obtained from the chalk at Sompting, Southover, Newmarket, Falmer, Patcham, Shoreham, Goldstone Hove, Housedean, Mossy Bottom and Stanhope Lodge, increases in demand for water supply that could result from policies promoting housing and employment development are not likely to have a significant effect on the Castle Hill SAC.

Castle Hill SAC is not designated for features that are sensitive to water resources. As stated in the Adur and Ouse Catchment Abstraction management Strategy (2007):

"The sites identified in the CAMS area however, do not have feature that are impacted by water resources activities. These "dry" Habitat Regulation designated sites are very important to the local environment, but there is no direct linkage to the CAMS work"

6.5.5 Water quality

Castle Hill SAC is not designated for features that are sensitive to water quality. Therefore issues relating to water quality as a result of development within Adur will have no significant effect on Castle Hill SAC.

6.6 **Other plans and projects**

The principal other plans and projects of relevance to development around the Castle Hill SAC is the Core Strategy for Lewes. An HRA screening exercise for that Core Strategy screened out recreational pressure on Castle Hill SAC. In any case, since no pathway connecting development in Adur to this European site has been identified there will be no 'in combination' effect.

6.7 **Summary**

Issues of urbanisation, recreational pressure, atmospheric air pollution, water resources and water quality have all been considered in relation to the impact of the Local Plan on Castle Hill SAC. At this stage, we are able to screen out the Local Plan entirely as being unlikely to lead to significant adverse effects on this European site.

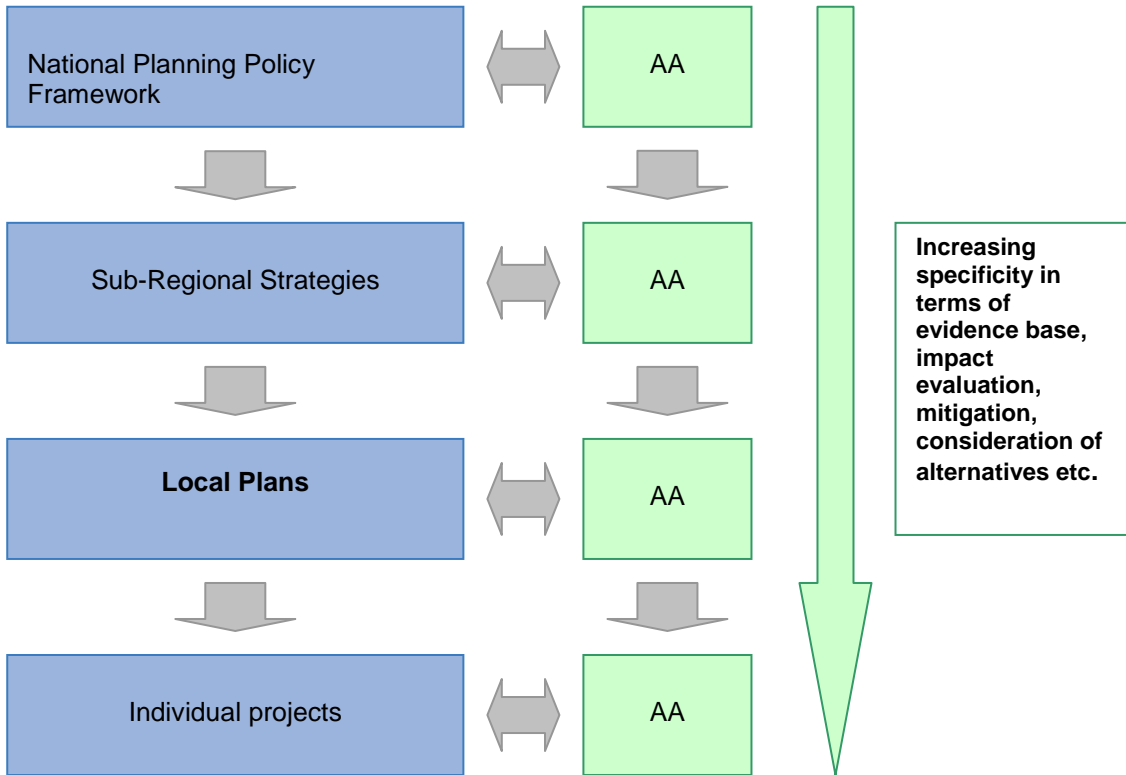
¹¹ David Illsley, Shepway District Council, personal communication

7 CONCLUSIONS**7.1 European sites**

All options and policies within the Draft Local Plan were scoped for potential conflicts with European sites. The majority of options and policies in the Draft Local Plan could be scoped out as there is no potential for any of these policies to result in adverse effects on European sites.

Of the three European protected sites included within the scope of this appraisal (Arun Valley SPA, SAC and Ramsar, Lewes Downs SAC and Castle Hill SAC), it is considered that the Draft Local Plan can be screened out entirely with regard to all three of these sites – Arun Valley, Lewes Downs and Castle Hill. This is primarily due to the considerable distances of the European sites from the Adur District boundary.

APPENDIX 1: 'TIERING' IN HABITAT REGULATIONS ASSESSMENT



APPENDIX 2: DRAFT LOCAL PLAN POLICIES

Table 2: Policies within the Draft Local Plan

Policy reference	Policy Summary	HRA screening outcome
<p>Policy 1 – Sustainable development</p>	<p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. We will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <p>a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <p>b) specific policies in that Framework indicate that development should be restricted.</p>	<p>The presumption in favour of sustainable development as set out in the National Planning Policy Framework explicitly excludes the application of this principle to development proposals that would lead to an adverse effect on the integrity of a European site.</p> <p>The policy promotes development of communities, the economy, services and infrastructure. Although the policy does note that protection of the environment, it does not specifically commit to protection of designate sites.</p> <p>The overall aim of this policy approach is to ensure that development is sustainable.</p>
<p>Policy 2 – Spatial Strategy</p>	<p>The delivery of new development which facilitates the regeneration of Adur and addresses the District’s needs will be managed as follows:</p> <p>The built up areas of Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate should be the main focus for development up to 2028. It will also be necessary to release some greenfield sites on the edge of the built up areas to ensure an adequate supply of suitable land for development as long as this does not significantly compromise the Local Green Gaps. Development within the Built Up Area Boundary (to be defined on the Proposals Map¹²) will be permitted subject to other policies in the Local Plan.</p> <p>Shoreham Harbour will be the focus of a significant level of development to facilitate regeneration of the Harbour and neighbouring communities, which will be delivered</p>	<p>This policy sets out the overall scale and strategy regarding development in the County until 2028. However given the distances of the European designated sites, no pathways of impact are likely to impact upon these sites, as such this policy can be screened out.</p>

¹² Please note that proposed amendments to the Proposals Map are indicated on the Maps accompanying this Draft Local Plan. Further inset maps will be prepared to accompany the submission version of this plan. A full Proposals Map will be prepared following Examination.

Policy reference	Policy Summary	HRA screening outcome
	<p>through an Area Action Plan to be prepared jointly between Adur District Council, Brighton & Hove City Council and West Sussex County Council.</p> <p>Shoreham Airport will also be a focus for economic regeneration benefits for the District.</p> <p>Development which would result in the coalescence or loss of identity of settlements will be resisted.</p> <p>The character of Sompting village, which lies outside of the Built Up Area Boundary, will be respected and maintained.</p>	
<p>Policy 3 – Amount of residential development</p>	<p>Over the period 2011-2028 development within the urban areas of Adur together with greenfield development in urban fringe locations will be delivered to achieve the growth and regeneration of Adur as follows:</p> <ul style="list-style-type: none"> • Option A – 1785 dwellings <p>or</p> <ul style="list-style-type: none"> • Option B – 2635 dwellings <p>In addition, approximately 1050 dwellings will be delivered within the Shoreham Harbour Regeneration Area (Adur part) within the same period</p> <p>The resulting target for residential development in Adur 2011 – 2028 will be either:</p> <ul style="list-style-type: none"> • 1785-2835 dwellings if Option A is selected <p>or</p> <ul style="list-style-type: none"> • 2635-3685 dwellings if Option B is selected 	<p>Delivering new houses is likely to increase the demand for recreational facilities, water supply and treatment, and to increased road traffic. However given the distances of the European designated sites, no pathways of impact are likely to impact upon these sites; as such this policy can be screened out.</p>
<p>Policy 4 – Delivering the Targets for Residential development</p>	<p>Option A The provision of 1785 dwellings (approximately 870 new homes on previously developed land and 900 new homes on green-field sites). Three options are proposed to deliver Option A (870 new homes to be built with each option):</p> <p>A1) New Monks Farm: 450 homes @35dph, Sompting Fringe: 250 homes @35dph, Hasler: 300 homes - @35dph</p>	<p>Options A and B are both likely to increase the demand for recreational facilities, water supply and treatment, and to increase road traffic. However given the distances of the European designated sites, no pathways of impact are likely to impact upon these sites; as such this policy can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>Total 1870 properties</p> <p>A2) New Monks Farm: 450 homes @35dph Hasler: 450 home @35dph Total 1770 properties</p> <p>A3) New Monks Farm: 450 homes @35dph Sompting Fringe: 420 homes @35dph Total 1740 properties</p> <p>Option B The provision of 2635 dwellings (approximately 870 homes on previously developed land and approximately 1765 on green-field sites). All three green-field sites plus an additional green-field allocation at Sompting North will be needed to deliver this option. To accommodate this level of development, a larger area of land at Sompting Fringe and Land north of the Hasler Estate would also be required. To accommodate the increased level of housing at New Monks Farm, the mix of uses would need to be altered to include more housing.</p> <p>B) New Monks Farm: 600 homes @35dph Hasler: 600 homes @ 35dph Sompting fringe: 420 homes @35dph Sompting North: 210 homes @ 35dph</p>	
<p>Policy 5 – Strategic Site Allocations</p>	<p>The submission version of this plan will contain a policy for each strategic residential site to be allocated. In addition to site-specific requirements, each of the strategic residential allocations will be required to accord with policies and standards in this Local Plan, including the following:</p> <ul style="list-style-type: none"> • Development in accordance with sustainability standards. • Flood mitigation/ defence measures. • Affordable housing in accordance with the Council’s standards. • Open space and green infrastructure, and biodiversity enhancements. • Transport requirements. • Air quality assessments. • Noise assessments. 	<p>This policy sets out the Strategic Site Allocations taking into account all of the environmental standards, rather than setting the scale and location of development. On this basis it can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>Legal agreements and/or the Community Infrastructure Levy will be used as appropriate to deliver necessary infrastructure, and detailed requirements for social and community facilities will be set out as appropriate.</p>	
<p>Policy 6 – Planning for Economic Growth</p>	<p>To facilitate regeneration and ensure a sustainable economy, up to 66,000 square metres of land will be allocated for appropriate employment generating uses in Adur up to 2028 at the following locations:</p> <ul style="list-style-type: none"> ● Shoreham Airport (up to 30,000sqm) ● New Monks Farm (up to 10,000sqm) ● Shoreham Harbour Regeneration Area (up to 26,000sqm within Adur) <p>These allocations will provide a range of employment sites in terms of locations and sizes, and provision will be made within these allocations for a range of accommodation types.</p> <p>In addition to the above provision, additional employment floorspace will also be achieved through redevelopment, intensification, change of use to employment, and provision of new employment sites. The majority of this floorspace will be provided within the town centres and the main existing employment areas</p> <p>Outside of designated employment areas, where new development for or extensions to B1, B2 and B8 uses is proposed, such applications will only be permitted where it is demonstrated they will not have an unacceptable impact on adjacent residential properties and are consistent with other policies in this plan.</p> <p>Criteria for the identification and provision of new employment floorspace will include the need to provide a variety of new business premises including small and affordable premises; the need to meet the modern needs of businesses in terms of floorspace, security, quality of environment, good access and services, and ensuring there is no conflict with neighbouring uses.</p>	<p>Regeneration to ensure sustainable development is likely to increase the demand for recreational facilities, water supply and treatment, and to increased road traffic. However given the distances of the European designated sites, no pathways of impact are likely to impact upon these sites, as such this policy can be screened out</p>
<p>Policy 7 – Shoreham Airport</p>	<p>Up to 30,000sqm of new employment floorspace (both aviation and non-aviation related), including a mix of office, industrial and warehouse space and ancillary cultural</p>	<p>Shoreham airport is situated a significant distance from any European designated sites, therefore no</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>and leisure space, will be provided on the eastern side of the Airport, subject to future landscape and capacity assessment. Development will be designed to reflect the open nature of the Shoreham-Lancing Local Green Gap and ensure key views are retained.</p> <p>Significant improvements will be required at the A27 Sussex Pad junction to accommodate new development on the eastern side of the Airport and this is likely to include a new roundabout to potentially serve both the proposed new development at the Airport and New Monks Farm. These measures will need to be accompanied by sustainable transport initiatives in order to reduce the need for travel by car to and from the site. These initiatives will include improvements to footpaths, cycle ways and bus transport, linking the Airport to the A259 coast road and Shoreham town centre. A travel plan will need to accompany any future planning application at the site, detailing sustainable transport measures to reduce the impact on the highway network.</p> <p>Due to the current Flood Zone 3b (functional floodplain) designation of the Airport, no development shall take place within the allocated area until the Adur Tidal Walls on the west side have been completed. New development at the Airport will be required to contribute towards the Adur Tidal Walls project. In addition, flood mitigation measures will need to be incorporated into the development in order to further reduce flood risk.</p> <p>New development for aviation related B1, B2 and B8 uses as well as other appropriate ancillary employment generating uses will continue to be supported on the existing developed area located at the southern end of the Airport.</p> <p>A Development Brief will be required for this site.</p>	<p>pathways of impact are likely to occur, as such this policy can be screened out.</p>
<p>Policy 8 – Shoreham Harbour Regeneration Area</p>	<p>Shoreham Harbour Regeneration Area is identified as a broad location for change within this Local Plan. This policy identifies the regeneration proposals for the Shoreham Harbour Regeneration Area that will be delivered over the plan period.</p> <p>The District Council will work with Brighton & Hove City Council, West Sussex County Council, Shoreham Port Authority and other key partners to support the long term regeneration of Shoreham Harbour and immediately surrounding areas. A Joint Area Action Plan is currently being prepared that will contain detailed policies for the Harbour area.</p>	<p>Shoreham harbour is situated a significant distance from any European designated sites, therefore no pathways of impact are likely to occur, as such this policy can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>The Council will facilitate the delivery of between 1200-1600 new dwellings within the Shoreham Harbour Regeneration Area within Adur District (approximately 1050 of these during the plan period). Housing delivery will be balanced with the provision of new employment-generating uses including B1 office, leisure, tourism and community uses as part of a sustainable, new waterfront community. The Council will work closely with existing site owners and businesses to identify their needs, support their future aspirations and facilitate relocations to suitable sites either within the consolidated Harbour or elsewhere in the local area.</p> <p>The balance of new housing and employment uses and overall levels of development will be refined through a Development Brief as part of the JAAP process and will be subject to public consultation. The target for delivery of housing within the Adur section of the Shoreham Harbour Regeneration Area will be ring-fenced separately from the housing target for the rest of Adur District.</p> <p>Developments will be encouraged that are consistent with the Vision and Strategic Objectives for the area as set out in the Interim Planning Guidance. Until the JAAP is adopted, the Port Masterplan, the Interim Planning Guidance and this policy will be material considerations in determining applications within the Harbour.</p>	
<p>Policy 9 – Lancing</p>	<p>Lancing Vision will be a material consideration in guiding the future development of the village centre.</p> <p>Links between Lancing village centre and Beach Green will be improved through environmental improvements and improved cycle and pedestrian facilities.</p> <p>Appropriate retail development, and environmental enhancements in Lancing village centre will be supported. The shopping area along North Road will be strengthened through restricting non-retail uses, while allowing a more flexible approach to uses at ground floor level along South Street.</p> <p>Development within the primary and secondary frontages of Lancing village centre will need to be in accordance with the following:</p>	<p>Lancing is situated a significant distance from any European designated sites, therefore no pathways of impact are likely to occur, as such this policy can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>Within the primary frontages of blocks 1, 2 (excluding Queensway Shopping Precinct) and 3 the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) • A3 (food and drink) where there is a long term vacancy and reasonable attempts have been made to sell or let the premises. <p>Any other uses will be resisted.</p> <p>Within the primary frontage of Queensway Shopping Precinct, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) • A2 (financial and professional services), A3 (food and drink) and A5 (hot food takeaways) uses where there is a long term vacancy and reasonable attempts have been made to sell or let the premises. <p>Within the secondary frontages of blocks 4, 5 and 6 a more flexible approach to change of use will be taken providing that such changes of use do not conflict with other policies or the 'Lancing Vision'.</p> <p>Lancing Business Park will continue to be protected for business use.</p>	
<p>Policy 10 – Sompting</p>	<p>The Council will work with Sompting Parish Council and the community of Sompting to explore the development of a Neighbourhood Plan to address development needs.</p> <p>Sompting village will not be expanded due to its linear character and countryside location within the local green gap. Improvements to West Street and/or the A27 and wider transport network to reduce traffic congestion in Sompting village will be sought</p>	<p>Sompting is situated a significant distance from any European designated sites, therefore no pathways of impact are likely to occur, as such this policy can be screened out.</p>
<p>Policy 11 – Shoreham-by-Sea</p>	<p>In addition to Shoreham Harbour, the town centre will be the main focus for new development in Shoreham-by-Sea to meet needs including housing, employment, community facilities and retail.</p> <p>The town centre sites identified below will contribute to the vitality of the town.</p> <ul style="list-style-type: none"> • Pond Road - identified for community uses, including a health centre and 	<p>Shoreham-by-sea is situated a significant distance from any European designated sites, therefore no pathways of impact are likely to occur, as such this policy can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>library</p> <ul style="list-style-type: none"> • Ropetackle North - mixed use development to include housing and employment) • Civic Centre site – mixed use development to include food retail <p>Other opportunities to the south and east of the centre may arise through the regeneration of Shoreham Harbour and will be addressed in the Joint Area Action Plan.</p> <p>The role of Shoreham town centre as a shopping centre meeting day-to-day needs and providing a niche retail offer should be reinforced and enhanced. Any proposals for new retail floorspace will be directed to the town centre first, in line with national and local policy.</p> <p>Development within the primary and secondary retail frontages of Shoreham town centre will need to be in accordance with the following:</p> <p>Within the primary frontages of blocks 2, 3, 5 and 6 the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops). • A3 (food and drink) where there is a long term vacancy and reasonable attempts have been made to sell or let the premises. <p>Any other uses will be resisted.</p> <p>Within the primary frontage of block 4, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops) and A3 (food and drink). <p>Any other uses will be resisted.</p> <p>Within the secondary frontages of blocks 1, 7 and 8, the following uses will be acceptable at ground floor level, subject to other relevant policies:</p> <ul style="list-style-type: none"> • A1 (shops), A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments) and A5 (hot food takeaways). <p>Any other uses will be resisted.</p>	

Policy reference	Policy Summary	HRA screening outcome
	<p>Traffic management measures, a car parking strategy (developed by Adur District Council with support from West Sussex County Council) and environmental improvements will be implemented to make the town centre more pedestrian friendly, more attractive and less polluted. New and improved cycle ways and footpaths will link to the town centre, to the railway station, and to the new pedestrian footbridge. Opportunities to improve pedestrian/ cycle access along the urban water front/river will be taken where feasible.</p> <p>Dolphin Road Business Park will continue to be protected for business use. Improvements and upgrades to meet modern business standards will be encouraged.</p> <p>Development must respect the setting of the historic town centre and should not have an adverse impact on views or the setting of St Mary de Haura church.</p> <p>The setting of the River Adur will be protected and opportunities taken through new development and other measures to improve public access to and along the River (where consistent with this aim) and open up views to it. New development adjacent to the River must respect its location and character. Sites on the waterfront will provide new and improved access to the water including a new waterside cycle and walkway, and slipways where appropriate, in conjunction with flood defence works where necessary.</p> <p>The main area of houseboats on the western bank of the River Adur will be maintained and new proposals assessed against the Council's Good Practice Guide for Houseboats.</p> <p>Throughout Shoreham-by-Sea, improvements relating to open space and the local environment will be carried out (some of which will be secured through funding associated with the regeneration of Shoreham Harbour). Areas including Beach Green, the Riverside car park and parts of the river frontage (on Shoreham Beach) will be improved through new landscaping, signage and street furniture. Opportunities to improve footpaths and cycle ways will also be taken.</p>	
<p>Policy 12 – Southwick and Fishergate</p>	<p>Within the primary frontage of Southwick town centre, A1 (shops) uses will be supported. A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments) and A5 (hot food takeaways) uses will also be permitted where they</p>	<p>Southwick and Fishergate is situated a significant distance from any European designated sites, therefore no pathways of impact are likely to occur,</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>would not have an adverse impact on the vitality and viability of the town centre and where they would not conflict with other policies.</p> <p>Environmental enhancements in Southwick Square will be supported.</p> <p>Traffic management measures to address HGV and other traffic associated with new development at Shoreham Harbour will be implemented on a number of roads including the A270</p>	<p>as such this policy can be screened out.</p>
<p>Policy 13 – Adur’s Countryside</p>	<p>Outside of the Built Up Area boundary (and outside of the sites identified in Part Two of this plan) development will only be permitted where the need for a countryside location is essential; it is for quiet informal recreation or the essential needs of agriculture or horticulture, flood management, or is otherwise consistent with this Local Plan (or subsequent DPDs). Opportunities for improvements to green infrastructure, including enhanced pedestrian and cycle links, and better access for those with mobility difficulties will be supported. The extension of isolated groups of buildings or the consolidation of linear or sporadic development will not be permitted.</p> <p>Any development in the countryside should not result in a level of activity which has an adverse impact on the character of the area.</p> <p>Outside of the strategic sites identified in this Local Plan, local green gaps between the settlements of Lancing/ Sompting–Worthing, and Lancing-Shoreham-by-Sea will be protected in order to retain the separate identities and character of these settlements. Within these areas any development permitted must not (individually or cumulatively) lead to the coalescence of settlements.</p> <p>The landscape character of the District and other areas of countryside, the coast, river, and settlement pattern will be protected and where possible enhanced. Any development or activities within the countryside must respect and where appropriate reinforce the distinctiveness and sense of place of the above areas, taking into account the various elements which contribute to their distinctiveness such as geology and landform, biodiversity, scenic quality, strategic views, tree cover, settlement patterns, heritage and local vernacular, and land use. The setting of the South Downs National Park must be respected.</p> <p>Where quiet informal recreation uses are proposed which require built facilities these</p>	<p>Measures such as improvements to green infrastructure will have a positive impact through deflecting recreational pressure from European designated sites situated outside of Adur District.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>should be located in the Built Up Area, or within existing buildings in the countryside.</p> <p>The appropriate change of use or conversion of existing buildings in the countryside will be permitted providing that they are structurally sound and of permanent construction, and in keeping with their surroundings in terms of form, bulk, design and materials; the proposals do not involve the erection of substantial extensions or the substantial demolition and rebuilding of existing buildings, and the proposals for conversion or change of use would conserve the character, fabric and setting of the building. In the case of residential buildings, any extensions should be subservient to the existing building.</p> <p>Opportunities to improve access to the South Downs National Park will be sought through joint working with the South Downs National Park Authority.</p> <p>Proposals for equestrian development in the countryside will only be granted where existing buildings are utilised; new buildings or associated development for such uses will only be permitted if they are well-sited in the landscape, and do not result in sporadic development that erodes the open character of the landscape.</p>	
<p>Policy 14 – Quality of the Built Environment and Public Realm</p>	<p>Development should be of a high architectural quality and respect and enhance the character of the site and its surroundings in terms of proportion, form, context, massing, siting, layout, density, height, size, scale, materials, detailed design features and landscaping. Development should:</p> <ul style="list-style-type: none"> • Enhance the local environment by way of its appearance and character, with particular attention being paid to the architectural form, height, materials, density, scale, orientation, landscaping and layout of the development; • Include a layout and design which take account of the potential users of the site; • Incorporate the principles of securing safety and reducing crime through design to create a safe and secure environment; • Make a positive contribution to a sense of place, local character and distinctiveness; and not have an unacceptable impact on adjacent properties, particularly residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook or open amenity space • Respect the existing natural features of the site, including land form, trees and 	<p>This policy sets the principles regarding the quality of the build, but does not set the quantum or location. As such, it can be screened out</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>biodiversity;</p> <ul style="list-style-type: none"> • Have safe access to the highway network, and not result in harm to highway safety. • Parking arrangements (amount and layout) must be acceptable under Draft Policy 27. • Incorporate public art in major developments* where appropriate. <p>Opportunities will be taken to improve the public realm through new development, transport schemes or regeneration schemes. These will aim to improve the quality, accessibility and legibility of public streets and spaces.</p> <p>Best practice guidance published by the Government, the Council and other bodies will be used in assessing applications. Design codes, planning briefs and masterplans will be developed for key sites where appropriate.</p> <p>Lighting incorporated into developments should provide the minimum for public safety, be energy efficient, designed to illuminate the target only and avoid light pollution.</p> <p>Express consent will only be granted for advertisements which respect the character and appearance of the surrounding area, and do not create a danger or hazard to public safety. Where an illuminated advertisement is acceptable in principle, such advertisements should be either externally illuminated or have internally illuminated individual lettering with a solid or opaque background.</p> <p>New shop fronts will be permitted where they are of a design and use materials which respect the character of the area and of the building of which they form part. Planning permission to replace shop fronts of inappropriate design or materials, or in poor condition in Conservation Areas will be granted providing the replacement is of appropriate design and materials, respecting the character of both the building and the Conservation Area.</p> <p>(*Major developments are defined in the Town & Country Planning (General Development Procedure) Order 1995 as 10 or more dwellings, or sites of 0.5 hectares or more; major commercial development is defined as 1,000 sqm floorspace or more, or sites of 1 hectare or more).</p>	

Policy reference	Policy Summary	HRA screening outcome
<p>Policy 15 – Strategic Approach to the Historic Environment</p>	<p>The Council will maintain, preserve and enhance the historic environment and character of Adur, which includes historic buildings, features, archaeological assets and their settings. Where development affecting any heritage asset is permitted, it must be of a high quality, respecting its context and demonstrating a strong sense of place.</p> <p>The Council will:</p> <ul style="list-style-type: none"> • Continue to produce Conservation Area Character Appraisals and Management Plans for the district’s Conservation Areas. • Recognise the role of and encourage the best use of heritage assets in regeneration, design, tourism and education. • Use Article 4 directions where important heritage assets are under threat. • Work with others, including the local community where appropriate, to address how best to conserve any assets at risk of loss, and to understand the significance of the historic environment in Adur’s character and sense of place. 	<p>This policy sets the principles regarding the strategic approach to the historic environment, but does not set the quantum or location. As such, it can be screened out.</p>
<p>Policy 16 – The Historic Environment</p>	<p>Listed Buildings: Planning permission and/or Listed Building consent will only be granted for any internal or external alterations, changes of use or extension to a Listed Building provided that the internal or external appearance or historic character of the building is not adversely affected. The reinstatement or replication of original features such as windows or doors will be encouraged. In the case of extensions and alterations, materials used must be consistent with those originally used, or typical of the locality. Changes of use may be considered which might normally be resisted on other grounds (subject to local access and environmental considerations) in order to secure retention of a building of historic or architectural interest. New development which would adversely affect the setting of a Listed Building, in terms of design or materials, will not be permitted.</p> <p>Conservation Areas: Development in Conservation Areas will be required to be of a high standard of design and material so as to respect, preserve and enhance the character and appearance of that area.</p>	<p>This is a development management policy and is concerned with ensuring that development is sustainable, rather than setting the scale and location of development. On this basis it can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>Advertisements in Conservation Areas should respect the character, proportions and design of the building on which it is displayed, including use of traditional materials where necessary.</p> <p>Where an application for planning permission or Conservation Area consent is submitted for the alteration, change of use, extension or repair of a building or feature in a Conservation Area, the retention of original features or, where this is not possible, their reinstatement with appropriate materials and the removal of unsympathetic features will be sought.</p> <p>Conservation Area Character Appraisals will be used to assess applications within designated Conservation Areas and opportunities will be taken through new development and other measures to preserve and enhance these areas, and to implement the recommendations of the Conservation Area Management Plans. The importance to the local areas of key unlisted buildings within Conservation Areas will be a material consideration in assessing an application for their demolition or development.</p> <p>Where in compelling circumstances the Council is minded to grant consent for demolition of a building in a Conservation Area, this shall not be granted until detailed plans for redevelopment have been approved. Consent will be subject to a condition preventing demolition until a contract for the approved redevelopment scheme has been awarded.</p> <p>Archaeological Features: The Council will ensure where possible the preservation of archaeological features against damaging or discordant development. Such features should only be removed or altered in compelling circumstances where there is no practical alternative and where provision can be made for recording.</p>	
<p>Policy 17 – The Energy Hierarchy</p>	<p>All development proposals should include an energy assessment to demonstrate how the energy hierarchy will be addressed. This should include information on the predicted energy demand and carbon dioxide emissions for the site and subsequently how these have been reduced using the energy hierarchy set out below.</p>	<p>This policy sets out the principles regarding energy hierarchy and is concerned with ensuring energy demand and efficiency is sustainable, rather than setting the scale and location of development. On this basis it can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>All new development proposals must demonstrate, as part of an energy assessment, how they will reduce their energy use through the hierarchy of:</p> <ol style="list-style-type: none"> 1. demand reduction 2. efficient energy supply 3. renewable energy provision <p>Deviation from this hierarchy approach must be fully justified as part of the energy assessment.</p>	
<p>Policy 18 – Sustainable Design</p>	<p>Residential:</p> <p>New build: Developments must achieve Code for Sustainable Homes level 4 as a minimum, seeking to gain more credits for Code levels where possible.</p> <p>All domestic planning applications must ensure the development:</p> <ul style="list-style-type: none"> • Has sufficient natural light and ventilation, and that solar heat gains in winter are maximised whilst overheating in summer is prevented through appropriate site layout and orientation, taking the micro climate and building form into account. • Has good thermal performance and air tightness to prevent heat loss. • Installs energy efficient fittings and appliances. <p>Conversions: Conversions of non-domestic buildings to residential use and refurbishments of existing domestic buildings must achieve the BREEAM Domestic Refurbishment ‘Very Good’ standard.</p> <p>Non-domestic Development:</p> <p>Non-domestic floorspace must achieve a minimum BREEAM ‘Very Good’ standard.</p> <p>Developers will be expected to provide certification evidence of the levels for both BREEAM and Code for Sustainable Homes at the design stage and post construction stage of development</p>	<p>This policy sets the principles regarding sustainable design but does not set the quantum or location. As such, it can be screened out</p>
<p>Policy 19 -</p>	<p>An assessment of the use of low carbon energy, renewable energy and residual heat/</p>	<p>Although renewable energy strategies can have an</p>

Policy reference	Policy Summary	HRA screening outcome
<p>Decentralised Energy and Standalone Energy Schemes</p>	<p>cooling for both domestic and non-domestic developments must be provided with any major planning application. This must include details of:</p> <ul style="list-style-type: none"> • The feasibility of connecting the development to existing heating / cooling / CHP networks where these already exist. • Opportunities for expansion of any proposed networks beyond the development area over time, and to plan for potential expansion. <p>For all decentralised and standalone energy related development, proposals will be favourably considered where they comply with other policies in this plan.</p>	<p>impact upon designated sites the distance of the European sited from Adur is significant enough to have no impact, therefore this policy can be screened out.</p>
<p>Policy 20 – Housing Mix and Quality</p>	<p>New residential development should incorporate a range of dwelling types, tenures and sizes (including affordable housing and low cost housing) that reflect and respond to Adur’s identified housing needs and demands.</p> <p>This will include market housing, based upon the following principles:</p> <ul style="list-style-type: none"> • Family sized housing should be provided through infill developments, identified strategic locations, and town centre regeneration. Such dwellings should mainly provide 2-3 bedrooms. • Town centre developments should aim to create family sized housing as well as flatted developments, to enhance the housing offer and support town centre renaissance. <p>Housing for older persons (including extra care and supported housing) will be required in both affordable and market tenures. This should be provided within the Built Up Area, in accessible locations.</p> <p>The Council will encourage the provision of housing (of all tenures) to Lifetime Homes standard.</p> <p>In order to protect the existing residential stock, proposals which result in the loss of dwellings to non residential use will not be supported. An exception may be made if the loss would facilitate the provision of a community facility.</p> <p>When considering proposals for conversion of dwellings into flats or maisonettes, account will be taken of the size and type of property to be converted, the effects the</p>	<p>New residential development is likely to increase the demand for recreational facilities, water supply and treatment, and to increased road traffic. However given the distances of the European designated sites, no pathways of impact are likely to impact upon these sites; as such this policy can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>proposal will have on the amenity of adjoining dwellings and the character of the area, including the current mix of dwellings. Proposals will be expected to comply with the criteria contained in the Council’s adopted Development Control Standard No 4 “Flat Conversions”.</p> <p>Adur District Council will develop a Supplementary Planning Document on Internal and External Space Standards to address private sector housing.</p>	
<p>Policy 21 – Principles For an Affordable Housing Policy</p>	<ul style="list-style-type: none"> • The policy will be based on up-to-date viability work, the Coastal West Sussex Strategic Housing Market Assessment, and other relevant research / evidence. • A threshold for seeking affordable housing in residential development is likely to be set. • On those sites meeting the threshold, a certain proportion will be required to be affordable tenures, as defined in the National Planning Policy Framework. • Depending on the findings of the viability work, a ‘stepped’ approach may be developed; that is, a larger proportion of affordable homes may be required from large sites, reducing down in ‘steps’ to a smaller proportion from small sites. For very small sites, financial contributions in lieu may be sought. These steps will be based on delivery and viability evidence. • The policy is likely to state that where developers are unable to meet the requirements for the delivery of affordable housing set out in the policy, the Council will expect this to be demonstrated through an ‘open book’ process. The District Valuer, at the developers cost, will provide an independent assessment. An alternative approach will be developed through negotiation; in the first instance, this is likely to involve amending the tenure mix. If this is still demonstrated to be unviable, the affordable housing requirement may be reduced. • The policy is likely to state that in exceptional circumstances only, if a site meets requirements for affordable housing as set out in the policy, but other factors demonstrate that affordable housing may not be appropriate, development of affordable dwellings on another site may be considered. If this 	<p>Delivery of new housing is likely to increase demand for recreational facilities, water supply and treatment, and to lead to increased road traffic. Due to the European designated sites being of a significance distance no impact through pathways are anticipated, therefore this policy can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>is not achievable, as a last resort in exceptional circumstances only, the Council will seek a financial contribution to enable provision of affordable homes elsewhere within the district. In these exceptional cases, the payment will be negotiated, and should reflect the cost of providing the number, type and size of affordable dwellings which would have been provided on-site.</p> <ul style="list-style-type: none"> • The Council will produce detailed guidance as to how this policy will operate in due course. • The Homes and Communities Agency is only funding schemes at “affordable rent”. In certain circumstances the Council will consider using either its own resources, if available, or a reduction in number of units sought to bring rents closer to “social” levels. • Some affordable homes will be required to be wheelchair accessible. 	
<p>Policy 22 - Density</p>	<p>New residential developments should achieve densities of a minimum of 35 dwellings per hectare.</p> <p>Development in the defined town/village centres and Shoreham Harbour will be expected to achieve higher densities.</p> <p>In exceptional cases residential development may be permitted at a lower density, where it is demonstrated by the applicant that the minimum density specified above would result in an unacceptable impact on the surrounding area.</p>	<p>Delivery of new housing is likely to increase demand for recreational facilities, water supply and treatment, and to lead to increased road traffic. Due to the European designated sites being of a significant distance no impacts through pathways are anticipated, therefore this policy can be screened out.</p>
<p>Policy 23 - Provision for Gypsies, Travellers and Travelling Show people</p>	<p>A site/sites will be allocated in a Gypsy and Traveller Development Plan Document to meet any identified need for permanent and/or transit accommodation.</p> <p>The following criteria will be used to identify suitable sites and to assess planning applications:</p> <ul style="list-style-type: none"> • The site should be located within a reasonable travelling distance of local services and community facilities and with good access to public transport 	<p>Gypsy and traveller sites can result in the same impact pathways as all other types of residential development. However, assuming that this policy will also be subject to compliance with other policies and the general text protecting European sites that Natural England have recommended is included within the Local Plan then this policy can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<ul style="list-style-type: none"> • The site should be served, or be capable of being served by adequate mains water and sewerage connections • Development of the site should be sympathetic to the local environment and should not have an unacceptable adverse impact on the amenities of both the residents of the site and occupiers of nearby properties <p>In assessing applications for Gypsy and Traveller sites, the Council will have regard to the Good Practice Guide: Designing Gypsy and Traveller Sites (CLG, May 2008).</p> <p>The Council may consider granting planning permission for sites outside of the Built Up Area Boundary provided that there is evidence of need, that the above criteria are met and that the intended occupants meet the definition of Gypsies and Travellers as set out in Government guidance.</p>	
<p>Policy 24 - Protecting and Enhancing Existing Employment Sites and Premises</p>	<p>Proposed conversions to uses other than employment (B1, B2 and B8 of the Use Classes Order) in the following employment sites will be resisted: Lancing Business Park, Dolphin Road Shoreham and Shoreham Airport.</p> <p>For sites not listed above, the preferred approach is that the conversion or redevelopment of land or buildings, currently or last in class B1, B2 or B8, for other use will be resisted unless it can be satisfactorily demonstrated that the site is, or premises are genuinely redundant and unlikely to be re-used for industrial or commercial use within the Plan period, having regard to the following factors:</p> <ul style="list-style-type: none"> (i) no effective demand exists or is likely to exist in the future to use the land or buildings for employment generating activities. Consideration should include the length of time the property has remained vacant, the attempts made to sell/let it, and the demand for the size and type of employment premises in the area; (ii) the condition of the property/site and the works required to make it suitable for an employment use, either through refurbishment or redevelopment, would be uneconomic. (iii) The loss of a small proportion of employment floorspace would lead to a 	<p>This is a policy that does not affect the quantum and location of development and can therefore be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>significant upgrade of the remaining employment floorspace</p> <p>Where any of the above criteria have been satisfied, a reduced amount of employment on the site as part of a mix of uses will be considered. Other employment generating uses not falling within B1, B2 and B8 uses should be considered as part of this mix of uses. Complete loss of employment uses will only be acceptable where it has been demonstrated that partial employment use cannot realistically be achieved.</p> <p>The upgrading of existing employment sites and buildings will be encouraged.</p> <p>A Supplementary Planning Document addressing the need to protect employment sites, and assessing genuine redundancy will be produced.</p>	
<p>Policy 25 - The Visitor Economy</p>	<p>The visitor economy should be promoted through the provision of new facilities including visitor accommodation, in locations with good public transport access and within the Built Up Area. Access (including new footpaths, cycleways and slipways) to the river, the coast and the South Downs National Park should be improved where possible.</p> <p>All proposals for visitor facilities should be sensitively designed so as to minimise impacts on the environment, including the impact of visitors or users of the facility.</p>	<p>This policy only relates to facilities in and immediately around Adur and includes a caveat that tourism measures should minimise visitor impact. As such this policy can be screened out on the basis that a significant effect is unlikely.</p>
<p>Policy 26 – Retail, Town centres and Local Parades</p>	<p>Within the defined town centre boundaries of Shoreham-by-Sea, Southwick and Lancing, town centre uses will be permitted, subject to compliance with other relevant policies.</p> <p>An impact test will be required for any proposed retail development with a floorspace of 1000sqm or more.</p> <p>Development within the primary and secondary shopping frontages will need to be in accordance with the place based policies in Part Three of this Plan.</p> <p>In the areas designated as local shopping parades, a predominant shopping use (as defined in the Use Classes Order 2010) on ground floor premises will be retained. Where proposals would result in a dominance of non-retail uses, this will only be acceptable where it can be demonstrated that retailing is no longer a viable use in that</p>	<p>This is a policy that does not affect the quantum and location of development and can therefore be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>unit, particularly where it has remained vacant for a long period and that reasonable attempts have been made to market it for retail purposes.</p>	
<p>Policy 27 - Transport and Accessibility</p>	<p>In order to secure significant improvements to transport and mobility in Adur District the preferred approach is to:</p> <ul style="list-style-type: none"> • Improve public transport and access to it where opportunities arise through further improvements at railway stations including access and integration with other modes of transport; improved information for bus and rail passengers and bus priority measures. • Work with West Sussex County Council and the Highways Agency to promote a sustainable transport system along the coast to help in the regeneration of the area including Shoreham Harbour, ensuring that the A259 and its junctions are improved. • Provide for improvements to the road network, including the A259 and A27 in order to complement the overall aim of securing more sustainable transport in the district. Measures include junction improvements, traffic calming, and where necessary new roads. Such schemes will be funded through developer contributions as well as from public funds and be subject to impact assessments on the environment including drainage, habitats, townscape and landscape. • Encourage proposals to extend the existing cycle network and secure a network of cycle and pedestrian facilities linking urban areas, key sites, open space and the countryside. Working with West Sussex County Council and through direct provision and contributions from new development, these will include new and improved rights of way, improved access across the A27 (for pedestrians and equestrians) and new and replacement footbridges across the railway line and River Adur. • Ensure that new development is located and designed to minimise the need for travel, facilitates and promotes the use of alternative sustainable modes of transport to the private car and provides or contributes to the necessary infrastructure to serve the development and to mitigate against any adverse 	<p>There are no transport links between Adur and the European designated sites therefore this policy can be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>impacts. Travel plans and Transport Assessments may be required for certain developments in line with West Sussex County Council policy.</p> <ul style="list-style-type: none"> • Ensure new development contributes to the mitigation of air pollution, particularly in Air Quality Management Areas. Air quality assessments may be required. Where practical, new development should be located and designed to incorporate facilities for electric vehicle charging points, thereby extending the current network. • Implement measures to address on and off-street parking, following completion of the Adur Parking Review and Strategy and survey work of Shoreham town centre by West Sussex County Council. • Apply the most up-to-date parking and cycle standards • Pursue with West Sussex County Council ways of managing the impact of HGVs in the district and implement measures as appropriate. 	
<p>Policy 28- Delivering Infrastructure</p>	<p>Development will be required to provide or contribute to the provision of facilities, infrastructure and services made necessary by development, or where it gives rise to a need for additional or improved infrastructure.</p> <p>Infrastructure should be provided at the appropriate time, prior to the development becoming operational or being occupied. Larger developments may need to be phased to ensure this requirement can be met.</p> <p>The Council will seek to develop a Community Infrastructure Levy for the area covered by this Local Plan, to address the delivery of infrastructure, including that required for the regeneration of Shoreham Harbour. Prior to the adoption of a CIL charging schedule, legal agreements will be used. These will continue to be used after the adoption of CIL to secure site specific infrastructure delivery, any financial contributions and/or phasing. An Infrastructure Provision SPD will also be prepared.</p>	<p>This policy for delivering infrastructure would not have a negative effect on the designated sites due to the significant distances of the sites to Adur's district, therefore this section can be screened out.</p>
<p>Policy 29 – Green Infrastructure and Open Space</p>	<p>Green infrastructure will be protected and enhanced and access to it improved where necessary and appropriate. Local standards will also be used to ensure that quantity, quality and accessibility levels for a number of green infrastructure typologies are achieved.</p>	<p>Measures such as improvement to green infrastructure will have a positive impact through deflecting recreational pressure from European designated sites situated outside of Adur District.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>Where there is an under provision of any green infrastructure typologies within the district, new green infrastructure will be provided where feasible and practical. Contributions from new development will be used to both enhance the quality of current stock and contribute towards any new provision where necessary. New developments will also be required to incorporate elements of green infrastructure into their overall design where appropriate.</p> <p>Major development will, where feasible, be required to provide open space on site in accordance with local standards. The type of open space to be provided will be determined by the scale and type of development and the needs of the area.</p> <p>Loss of existing open space, sports and recreation buildings, and other key green infrastructure will be resisted unless:</p> <ul style="list-style-type: none"> • The open space, buildings or land has become surplus to requirements and is not required to meet any other short falls in open space types; or • The loss resulting from the proposed development would be replaced by equivalent or improved provision in terms of quantity and quality in a suitable location. <p>Opportunities will be taken to improve biodiversity in the district. When considering the type of green infrastructure provision, the ecological characteristics of the area will also be taken into account in order to maximise the biodiversity benefits.</p> <p>The Council will work with relevant partners and developers to facilitate the creation of an integrated network of green infrastructure in Adur. A Green Infrastructure Strategy and a Green Infrastructure and Open Space SPD will be produced to enable this network to be created.</p> <p>The planting of trees will be supported and encouraged and Tree Preservation Orders will be made to ensure that healthy locally important trees that make a positive contribution to the streetscene are protected.</p> <p>Proposals for built sports facilities will be supported where they are in accordance with other policies in this plan.</p>	

Policy reference	Policy Summary	HRA screening outcome
<p>Policy 30 – Planning for Healthy Communities</p>	<p>The reduction of health inequalities and initiatives to facilitate healthier lifestyles will be supported, where these can be delivered through the planning system. The Council will work with health care providers to deliver up-to-date healthcare facilities, and with the providers of other social and community infrastructure to deliver appropriate facilities in accessible locations, to meet local needs.</p>	<p>This is a policy that does not affect the quantum and location of development and can therefore be screened out.</p>
<p>Policy 31 – Pollution and Contamination</p>	<p>Development should not result in pollution or hazards which prejudice the health and safety of the local community and the environment, including nature conservation interests and the water environment.</p> <p>New development in the district will be located in areas most suitable to the use of that development to avoid risks from noise, air or light pollution.</p> <p>Mitigation measures will need to be implemented for developments that could have a negative impact on pollution in the district, including the Air Quality Management Areas. Any new development that would have an unacceptable impact on levels of pollution in the district and cannot be mitigated will be resisted.</p> <p>Guidance and/ or Supplementary Planning Documents relating to Noise and Air Pollution will be produced by the Council.</p> <p>Air quality assessments and/or noise assessments will be required in conjunction with development proposals.</p>	<p>This policy would not have a negative effect on the designated sites due to the significant distances of the sites to Adur’s district, therefore this section can be screened out</p>
<p>Policy 32 – Flood Risk and Sustainable Drainage</p>	<p>The Council will work with relevant bodies, including the Environment Agency, to ensure that flood risk in the district is reduced.</p> <p>A site specific flood risk assessment must be submitted with planning applications for:</p> <ul style="list-style-type: none"> • Major developments located in Flood Zone 1 (sites greater than 1ha) • All development in Flood Zones 2 and 3 • All development or change of use, regardless of flood zone or size, where flood risk from other sources (surface water, sewer, groundwater) is identified by the 	<p>This is a policy that does not affect the quantum and location of development and can therefore be screened out.</p>

Policy reference	Policy Summary	HRA screening outcome
	<p>SFRA.</p> <p>The flood risk assessment will need to demonstrate, to the satisfaction of Adur District Council and the Environment Agency, that development:</p> <ul style="list-style-type: none"> • is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; • will be safe for its lifetime taking account of the vulnerability of its users; • will not increase flood risk elsewhere • will, where possible, reduce flood risk overall • will give priority to the use of sustainable drainage systems <p>New development within the district must include some form of Sustainable Drainage System (SuDS) or other appropriate design measures in order to reduce the risks of surface water flooding and to mitigate the risk of pollution to groundwater sources.</p> <p>On greenfield sites, substantial storage through SuDS will be required to achieve a reduction in runoff to levels below that experienced prior to development in areas at risk of surface water flooding or where surface water flooding events have occurred in the past (in accordance with the Council's SFRA). On relevant sites, storage of runoff during the high part of the tidal cycle should be addressed. Appropriate SuDS will also be required where development has potential to impact upon Source Protection Zones.</p> <p>SuDS must be designed sensitively and must seek to enhance landscapes, increase biodiversity gains, and provide quality spaces.</p> <p>For all developments, applicants will be required to demonstrate that acceptable management arrangements are in place and funded, to ensure the ongoing maintenance of SuDS into the future. Where it is not practical to provide SuDS onsite, the development of strategic level SuDS may be considered appropriate. In these circumstances, contributions may be required.</p>	