

Sustainability Appraisal (SA) of the Adur Local Plan



SA Report

March 2016

Acknowledgement

The structure of this report reflects advice from URS (now AECOM) consultants who worked with Adur District Council on the Sustainability Appraisal of the Adur Local Plan in 2014. A significant portion of the content of this report was written by URS during this time.

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INTRODUCTION

1 BACKGROUND

- 1.1.1 This Sustainability Appraisal (SA) has been undertaken in support of the emerging Adur Local Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positives. SA of Local Plans is legally required.¹

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²
- 2.1.2 The Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the 'likely significant effects' of 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 In-line with the Regulations, the report - known here as **the 'SA Report'** – must essentially answer four questions:
1. What's the scope of the SA?
 2. What has Plan-making / SA involved up to this point?
 - There must have been at least one earlier plan-making / SA iteration. 'Reasonable alternatives' must have been appraised.
 3. What are the appraisal findings at this current stage?
 - i.e. in relation to the draft plan.
 4. What happens next?
- 2.1.4 These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report. Table 1.1 explains the links between the regulatory requirements and the four SA questions.

3 STRUCTURE OF THIS SA REPORT

- 3.1.1 This document is the SA Report for the Adur Local Plan and hence needs to answer all four of the questions listed above with a view to providing the information required by the Regulations. **Each of the four questions is answered in turn, below.**

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2012).

² Directive 2001/42/EC

Table 1.1: Questions that must be answered by the SA Report in order to meet Regulatory³ requirements

SA REPORT QUESTION		IN LINE WITH SCHEDULE II THE REPORT MUST INCLUDE...
What's the scope of the SA?	What's the plan seeking to achieve?	<ul style="list-style-type: none"> • An outline of the objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	<ul style="list-style-type: none"> • Relevant environmental protection objectives, established at international or national level • Existing environmental problems which are relevant to the plan including those relating to areas of particular importance
	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> • Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan • Environmental characteristics of areas likely to be significantly affected • Existing environmental problems which are relevant to the plan including those relating to areas of particular importance
	What are the key issues & objectives that should be a focus?	<ul style="list-style-type: none"> • Problems / issues / objectives that should be a focus of appraisal
What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> • Outline reasons for selecting the alternatives dealt with (and thus an explanation of 'reasonableness') • The likely significant effects associated with alternatives • Outline reasons for selecting the preferred approach in-light of alternatives appraisal / a description of how environmental objectives and considerations are reflected in the draft plan.
What are the appraisal findings at this current stage?		<ul style="list-style-type: none"> • The likely significant effects associated with the draft plan • The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of the draft plan
What happens next?		<ul style="list-style-type: none"> • A description of the monitoring measures envisaged

N.B. The right-hand column of Table 1.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

³ Environmental Assessment of Plans and Programmes Regulations 2004

PART 1: WHAT'S THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA. In particular, and as required by the Regulations⁴, this Part of the SA Report answers the following questions in turn:

- What's the Plan seeking to achieve?
- What's the sustainability 'context'?
- What's the sustainability 'baseline'?
- What are the key issues and objectives that should be a focus of SA?

4.2 Consultation on the scope

4.2.1 The Regulations require that: *"When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are Natural England, The Environment Agency and Historic England.⁵ As such, these authorities - and wider stakeholders - were consulted on the scope of the SA in 2011. The Scoping Report (which was amended subsequent to consultation) is available at: <http://www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/>.

4.2.2 The 2011 Scoping Report provides an agreed basis for appraisal; however, it is important to note that our understanding of the SA 'scope' has not remained entirely static since that time. This is appropriate given that understanding of sustainability problems/issues/objectives inevitably evolves over time.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

⁵ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'.*

The SA Report must include...

- Outline the main objectives of the plan and relationship with other relevant plans and programmes

5.1.1 The new Local Plan, once adopted, will present a spatial strategy for Adur up to 2031. It will determine the distribution of various kinds of development around the District and will provide a policy framework that will ultimately provide the basis for a wide range of planning decisions in the future.

5.1.2 The principal influence on plan preparation is the National Planning Policy Framework (NPPF), which sets out a suite of National policies that Local Plans must adhere to. The Local Plan is also developed in-light of the plans of neighbouring authorities (adopted and emerging). This is important given the 'Duty to Cooperate' established by the Localism Act 2011. There is a particular need for Adur to cooperate closely with Worthing Borough, Arun District, Horsham District, Mid Sussex District and Brighton and Hove City and the South Downs National Park.

5.2

Plan objectives

- To deliver 3,609 **dwellings** up to 2031 to contribute to meeting objectively-assessed needs in Adur in terms of type, size and tenure.
- To ensure that **local communities** will benefit from regeneration through physical and social integration, and the provision of new homes (including affordable housing) which meet identified needs, employment opportunities, social and community facilities, leisure and transport facilities (including sustainable transport measures).
- To **regenerate Adur** through ensuring a range of employment opportunities and through new sustainable development opportunities. In particular, regeneration will seek to:
 - Achieve strategic development at Shoreham Harbour, delivering housing and jobs; creating social, economic, environmental and infrastructure improvements which benefit Adur, its businesses, residents and visitors and contribute to the prosperity of the wider sub- region.
 - Increase the role of Shoreham Airport in the local economy and wider area, through the provision of increased employment opportunities, enhancement of its role as an important visitor attraction, and its continued importance as a General Aviation Airport.
 - Achieve strategic development at New Monks Farm, delivering housing and jobs and creating social, economic, and infrastructure improvements.
- To ensure the timely delivery of appropriate **infrastructure** to meet identified physical, social, community and environmental needs. This will include partnership working and may include the use of the Community Infrastructure Levy (CIL) as appropriate.
- Enhancements to the **streetscene** of the town and village centres will be made, to ensure they remain attractive, vital and viable, and their role as retail centres serving local communities is maintained.
- Adding to natural capital by improving **biodiversity** , recreation and leisure facilities in order to provide an interlinked network of multifunctional open spaces (within the context of a Green Infrastructure strategy) - through and from urban areas (including Shoreham Harbour) to the coast and countryside, the provision of open space and greater opportunities for (and access to) informal recreational uses within the Local Green Gaps. Public access to the National Park and other countryside assets will be improved.

- To protect and improve the setting of the South Downs National Park, the River Adur, character and setting of the coastal waterfront, Local Green Gaps, conservation areas and other **cultural and historic assets** and where appropriate, access to them. Areas of nature conservation value will be preserved and enhanced. New development will avoid impacts on biodiversity and the natural environment as far as possible, and mitigate and/or compensate where necessary.
- To deliver improvements identified in Conservation Area Management Plans and enhance other **heritage** assets where opportunities arise. High standards of design will be encouraged in all developments.
- To improve **connectivity** within and to Adur's communities as well as to Brighton and Worthing, achieve more sustainable travel patterns and reduce the need to use the private car through public transport services and infrastructure, demand management measures, and new and enhanced cycle and footpaths. These actions will contribute to an improvement in air quality. Innovative sustainable transport measures will be encouraged.
- To work with Highways England and West Sussex County Council to determine how best to **secure improvements to the A259 and A27** to manage (and where possible, reduce) congestion. The impact of Heavy Goods Vehicles servicing the Port and the District's businesses will be managed.
- To ensure that the risks associated with **flooding** are avoided or mitigated through directing development to appropriate locations and, where this is not possible, through appropriate flood mitigation measures. Where feasible, new flood defences and other measures to reduce flood risk should take the form of ecologically sustainable solutions. Water quality will be protected and where possible, enhanced.
- To ensure that a range of **sustainable construction and design** measures will be utilised in new developments. New development will also have been designed to be more resilient to the effects of climate change.

5.3 What's the plan not trying to achieve?

- 5.3.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

The SA Report must include...

- Relevant sustainability objectives, established at international / national level
- Existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance

6.1 Introduction

- 6.1.1 An important step when seeking to establish the appropriate scope of an SA involves reviewing context messages in relation to: broad problems / issues and objectives. The Core Strategy Scoping Report (June 2011) identified key messages from relevant Plans, Policies, Programmes, Strategies and Initiatives (PPPSIs). The context review has since been updated, and is presented within the **Technical Appendices** document that accompanies this SA Report. A brief summary of key context messages is presented below.

6.2 Environmental context

- 6.2.1 **Air quality** improvements are the focus of the EU Thematic Strategy on Air Pollution, which aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year). In addition to this the EU Air Quality Directive 2007/50/EC places stringent air quality monitoring requirements upon member states. Nationally, the NPPF presents a clear message for the planning system to prevent new and existing developments contributing unacceptable levels of air pollution, whilst suggesting Plans should contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas. In addition to this the Environment Act 1995 and the Air Quality Regulations as amended require Local Authorities to assess air quality and where necessary declare Air Quality Management Areas and produce Air Quality Action Plans. As such the Adur District Council Air Quality Action Plan 2007 details necessary steps to improve air quality within the two identified Air Quality Management Areas (AQMA's) identified. An AQMA management plan presents actions that could be carried out to reduce air pollution.
- 6.2.2 Protection and enhancement of **biodiversity** is promoted through several pieces of EU legislation, which include the EU Habitats Directive 92/43/EEC and the EU Wild Birds Directive 2009/147/EC. The importance is further emphasised by the EU Biodiversity Strategy, adopted May 2011, which aims to deliver on the established Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'. Within England the NPPF requires planning authorities to plan positively for the creation, protection, enhancement and management of ecological networks and 'green infrastructure'. Supplementary to this the Natural Environment White Paper (NEWP) emphasises the importance of a healthy natural environment to sustained economic growth, prospering communities and personal well-being. At a sub-regional level the Sussex Biodiversity Action Plan (BAP) identifies species and habitats most under threat, and sets out an agenda for action.
- 6.2.3 The objective of promoting **energy efficiency and renewable energy** production has been the focus of EU legislation including EU Directive 2009/28/EC on promotion of use of energy from renewable sources and the EU Directive 2010/31/EC on the Energy Performance of Buildings. In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020 against the 1990 baseline. The NPPF highlights the important role planning can have in achieving substantial reductions in greenhouse gas emissions and supporting the delivery of low carbon and renewable energy. Locally the Adur and Worthing Sustainability Strategy (2010) considers energy and the associated carbon dioxide equivalent emissions as one of six key themes, setting targets and an action plan for improvement.

- 6.2.4 The avoidance and reduction of **flood risk** is championed by the EU Floods Directive 2007/60/EC. This requires Member States to assess all water courses and coastlines for risk and to plan adequate measures to reduce the risk. In England the NPPF suggests that development in areas of high flood risk should be avoided, and that where new development is permitted it should be made safe without increasing flood risk elsewhere. The River Adur Catchment Flood Management Plan identifies long-term policies for managing flood risks from the river over the next 100 years to ensure a more sustainable approach to flood management. The plan considers likely future impacts of climate change and the implications of further urban development within the catchment area. The First Review of the Beachy Head to Selsey Bill Shoreline Management Plan (2006) – a large scale assessment of the risks to people and the historic and natural environment resulting from the evolution of the coast – resulted in the Rivers Arun to Adur Flood and Erosion Management Strategy 2010-20. As part of this Strategy, the Environment Agency is currently progressing the Shoreham Adur Tidal Walls Scheme which aims to improve flood defences along the east and west banks of the River Adur.
- 6.2.5 The NPPF establishes a need to set out a ‘positive strategy’ for the conservation and enjoyment of the **historic environment**, including those heritage assets that are most at risk. Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- 6.2.6 The European Landscape Convention (ELC) came into force in the UK in March 2007. The ELC defines **landscape** as: “An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.” It recognises that the quality of all landscapes matters – not just those designated as ‘best’ or ‘most valued’. The NPPF refers to the need to protect and enhance valued landscapes and identifies that major development should be avoided in designated areas, unless in the public interest.
- 6.2.7 **Noise** is an issue that is related to air quality, given that problems are driven by traffic and also industrial operations. Noise guidance provided by the World Health Organization states that “general daytime outdoor noise levels of less than 55 decibels are desirable to prevent any significant community annoyance”. At a sub-regional level, a Planning Noise Advice document for Sussex was produced in 2013 by East and West Sussex Local Authorities which provides advice for developers when making a planning application.
- 6.2.8 The NPPF recognises the need to: Protect and enhance **soils** and associated watercourses; Prevent new or existing development from contributing to or being adversely affected by the presence of unacceptable levels of soil or water pollution or land instability; and Remediate ‘despoiled, degraded, derelict, contaminated and unstable land’, where appropriate. Planning decisions should take sufficient account of soil quality, particularly where ‘best and most versatile’ agricultural land is involved. There is a need to encourage the effective use of land through the reuse of land which has been previously developed, provided that this is not of high environmental value. The NPPF requires an approach to housing density that reflects local circumstances.
- 6.2.9 The need to minimise travel and improve access to **sustainable modes of transport** is emphasised in England by the National Planning Policy Framework (NPPF). Under the NPPF local plans are encouraged to minimise journey lengths for all activities such as employment, shopping and leisure. Additionally the local transport system should be balanced to favour sustainable transport modes (including walking, cycling and public transport). Effective planning for sustainable transport will also bring other sustainability benefits such as achieving health objectives. Locally the West Sussex Transport Plan 2011-2026 sets out to increase the use of sustainable modes of transport, improve network efficiency in order to reduce emissions and delays, minimise the impact of HGVs on the local community, improve safety for all road users and reduce traffic emissions.

- 6.2.10 The EU Waste Framework Directive 2008/98/EC requires that the **waste** hierarchy is observed and is a material consideration in determining individual planning applications. The Government Review of Waste Policy in England also contains actions and commitments for key actors, which includes local authorities, to work towards a zero waste economy. At a local level the Adur and Worthing Sustainability Strategy (2010) considers waste and recycling as one of six key themes, establishing targets and an action plan for improvement.
- 6.2.11 The protection and enhancement of **water** quality and quantity is driven by the Water Framework Directive (2000/60/EC), which requires a catchment-based approach to water management. The Framework Directive defines water protection as relating to both surface waters and groundwater, and requires that Member States achieve 'good status' for all waters by an assigned deadline. At the national level, the NPPF requires that planning decisions prevent existing and proposed development from contributing to or being at an unacceptable risk from water pollution. The NPPF also emphasises the important role that can be played by Sustainable Urban Drainage Systems (SuDS) and water efficiency design measures. At a local level, the Adur and Ouse Catchment Abstraction Management Strategy considers available water resources in the catchment and the sustainability of current abstraction rates. The strategy encourages the incorporation of Sustainable Urban Drainage Systems (SuDS), water meters and other water efficiency measures as part of new housing developments.

6.3 Socio-economic context messages

- 6.3.1 The NPPF seeks to ensure a wide choice of high quality **homes**, with more opportunities for home ownership, in order to create sustainable, mixed communities. There is a need to plan for a mix of housing based on the local demography and the needs of the different groups within the local community. The Adur and Worthing Housing Strategy 2012-2017 outlines a list of priorities for the local area. This includes balancing the local housing market, meeting the need for affordable homes, preventing homelessness, providing housing support and promoting a healthy private sector.
- 6.3.2 **Social inclusion** is promoted in the EU through the Renewed European Sustainable Development Strategy and is considered one of the seven key challenges for the EU within the strategy. Within the NPPF, a core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'. The NPPF also emphasises the need to: facilitate social interaction and create healthy, inclusive communities; promote retention and development of community services / facilities; ensure access to high quality open spaces and opportunities for sport and recreation; and promote vibrant town centres. Planning for good health is high on the agenda, in light of the 'Marmot Review' of health inequalities in England, which concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'. Planning for good health can complement planning for biodiversity (green infrastructure) climate change mitigation (walking/cycling). Locally the West Sussex Sustainable Community for 2008-2020 highlights essential areas for improvement which include reducing West Sussex contribution to climate change, improving access to high quality education, reducing the difference in life expectancy between different demographics and increasing safety in West Sussex.
- 6.3.3 The NPPF outlines the Government's commitment to ensuring **sustainable economic growth**. As such planning policies are encouraged not to overburden investment in business but to address potential barriers to investment such as lack of infrastructure and housing. Plans are also encouraged to avoid long term protection of sites for employment use if they are not likely to be used for this purpose. The Adur and Worthing Council Corporate Priorities document has five core aims, one of which relates to supporting and improving the local economy. More recently, the Adur & Worthing Economic Plan 2013 – 2023 established five broad priority areas (with more specific objectives listed under each):
- Support the needs of the local business community - Adur and Worthing councils will work with partners to address business requirements and support the growth and retention of local business.
 - Stimulate business growth to ensure a strong and diverse local economy, improve GVA and create new employment opportunities - Adur and Worthing councils will work with

partners to unlock growth potential and promote the area as an attractive business location and visitor destination.

- Enhance the business environment - Adur and Worthing councils will work with partners to overcome existing constraints and to help develop a business environment that will provide the services and facilities, essential to meeting current and future business needs.
- Match skills with local job opportunities to ensure that businesses have access to a skilled workforce, which meets current and future business requirements - Adur and Worthing councils will encourage a cohesive approach to skills development and retention.
- Go green with a view to securing economic benefits - Adur and Worthing councils will work with partners to reduce their carbon footprint, reduce congestion, adhere to the latest legislation and support the local supply chain.
- Promote health and wellbeing - Adur and Worthing councils will work with partners to improve the health of their staff.

6.3.4 The Economic Plan was prepared in light of the ‘Economic Strategy for West Sussex 2012-2020’ prepared by the County Council. The Strategy is clear that: *“To some extent, West Sussex is not one economy, but three [The Gatwick Diamond, Coastal West Sussex and Rural West Sussex], each with its own set of challenges and opportunities.”* Coastal West Sussex is characterised in a sentence as having *“access challenges; pockets of deprivation; a limited supply of employment land; too many people in low paying jobs; and low skills amongst many of its residents.”*

6.3.5 Another important document is the Strategic Economic Plan published in March 2014 by the Coast to Capital Local Enterprise Partnership (LEP). It sets out ambitions for sustainable economic growth and details investments and proposals for realising ambitions. The Plan sets out to “focus on just those areas where we know we can have most impact and will deliver a major transport, housing and infrastructure programme to drive growth” and as such identifies nine ‘spatial priority’ areas. One of these is Shoreham Harbour and Shoreham Airport, where the aim is to “unlock major housing developments, including the flood defences agreed in the City Deal”; and another is the ‘Coastal Corridor’ from Shoreham to Chichester, where the aim is to ‘change the growth story’ and capitalise upon City Deal commitments.

The SA Report must include...

- Relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan
- Characteristics of areas / populations etc. likely to be significantly affected
- Existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance

7.1 Introduction

7.1.1 Baseline review is about tailoring and developing the problems/issues identified through context review. A detailed understanding of the baseline can aid the identification / evaluation of 'likely significant effects' associated with the plan / alternatives.

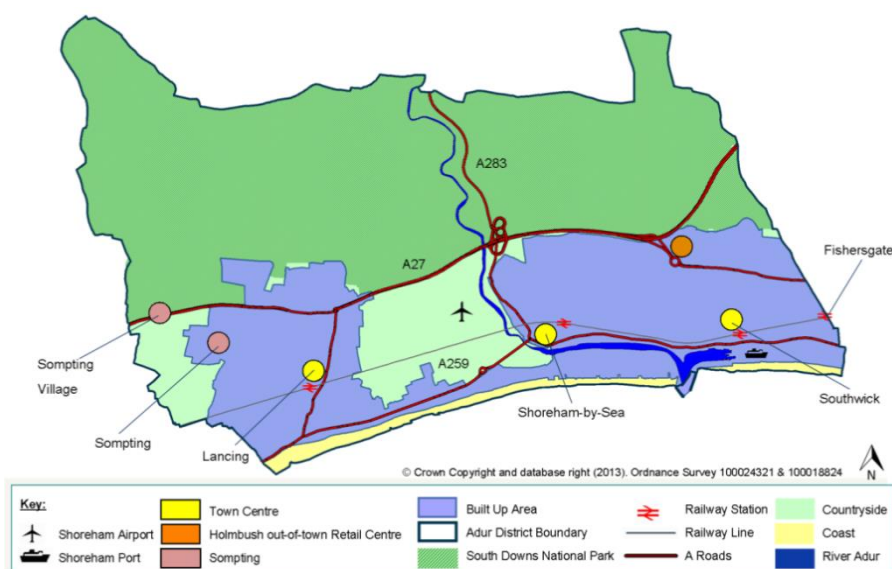
7.1.2 The Core Strategy Scoping Report (June 2011) established the baseline initially, and then an update was undertaken in 2012 (to inform preparation of the Interim SA Report published alongside the Draft Adur Local Plan consultation) and 2013 (to inform preparation of the Interim SA Report published alongside the Revised Draft Adur Local Plan consultation). An updated summary of the baseline review is presented below.

7.2 A general profile of the Adur district

7.2.1 Adur is located between Brighton & Hove and Worthing on the Sussex coast, in the county of West Sussex. The district shares its boundaries with Worthing to the west, Horsham and Arun to the north and Brighton and Hove to the east. The district covers an area of just under 16 square miles (41.5 Sq kms). The urban area is made up of five main areas; Southwick, Fishersgate, Shoreham-by-Sea, Sompting and Lancing and each of these areas has their own identity and character. The remainder of the district is largely rural in character falling within the South Downs National Park.

7.2.2 Adur has a population of 63,200 (ONS 2014) and has approximately 27,569 domestic properties (ONS 2011). As of 2011, 22% of Adur's residents were 65 or over which is similar to the average for the County of West Sussex (21%) but notably higher than the national average (16%). The population of Adur, although increasing relatively slowly, is likely to see a significant increase in the number of elderly due to people generally living longer.

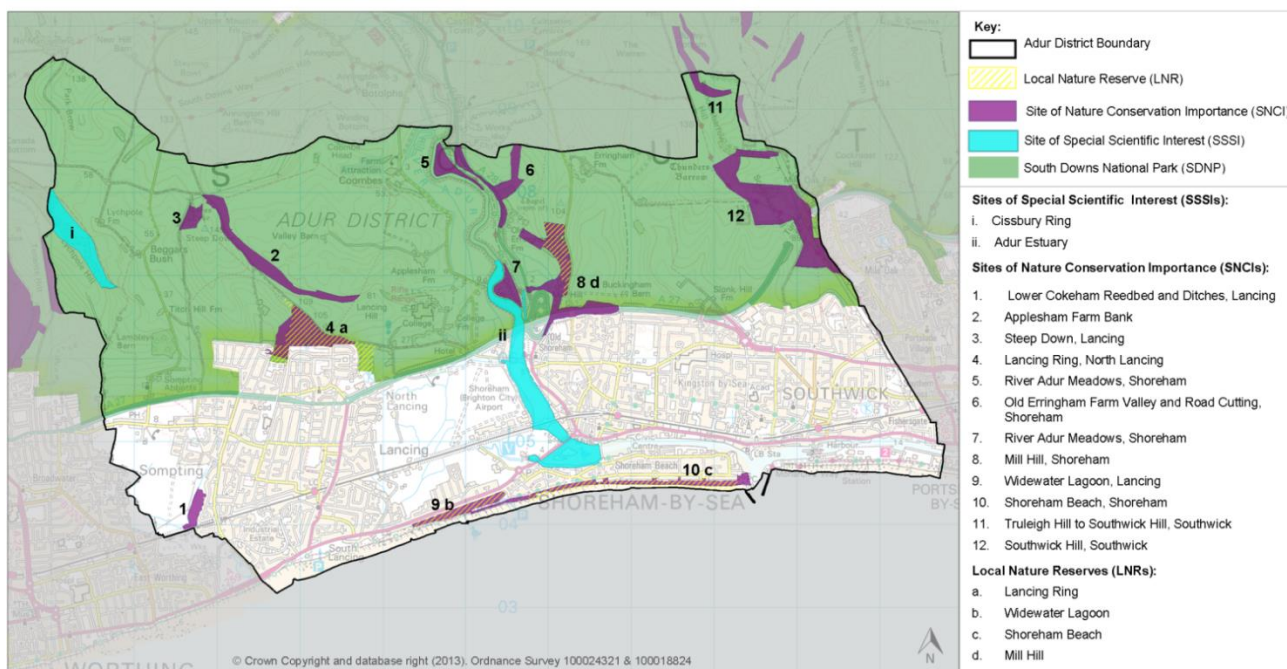
Figure 7.1: Key features of Adur District



7.3 Environmental characteristics of the district

- 7.3.1 Just over half the district is comprised of the South Downs National Park, which highlights a number of sensitivities (and opportunities) for the district in terms of landscape, biodiversity, tourism and recreation. Other key natural features in the district include the coastline and the River Adur. There are a number of Biodiversity Opportunity Areas either within or adjacent to the district. These include Shoreham Estuary and the Beach and Adur to Newtimber including Mill Hill.
- 7.3.2 The district has two Sites of Special Scientific Interest (SSSIs) – the River Adur and Cissbury Ring. There are eleven Sites of Nature Conservation Importance (SNCI) and four Local Nature Reserves (LNRs). In addition, there are a number of Biodiversity Action Plan habitats. These include ancient woodland, chalk grassland, coastal and floodplain grazing marsh, deciduous woodland, notable road verge, reedbed/fen, traditional orchard and vegetated shingle.

Figure 7.2: Key natural and landscape assets



- 7.3.3 There are a number of areas of historic importance within Adur. The district has seven Conservation Areas which are defined as "areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance" (Planning (Listed Buildings and Conservation Areas) Act 1990). There are 118 listed buildings, a number of which are Grade I and Grade II* listed, as well as a number of Scheduled Ancient Monuments. Some of the key historic buildings in the district include Lancing College, the Church of St Mary de Haura (Shoreham-By-Sea), the Shoreham Airport terminal building, the Parish Church of St Mary (Sompting) and the Old Fort. There are also a number of undesigned heritage assets that make a significant contribution to local character.

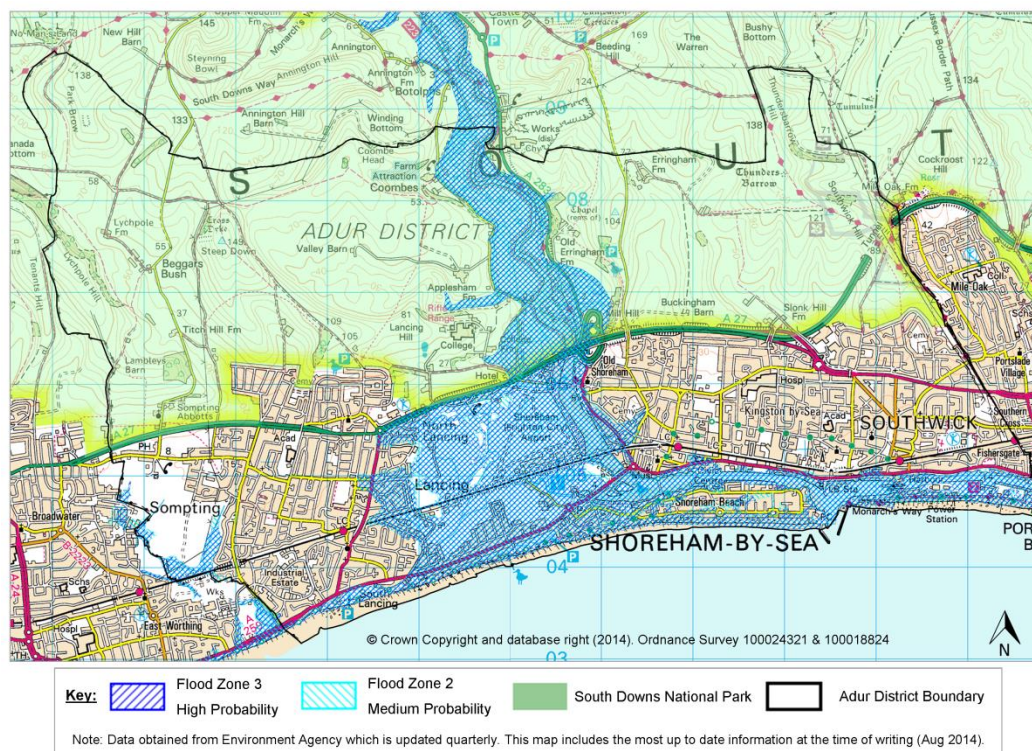
Figure 7.3: Key heritage assets



7.3.4

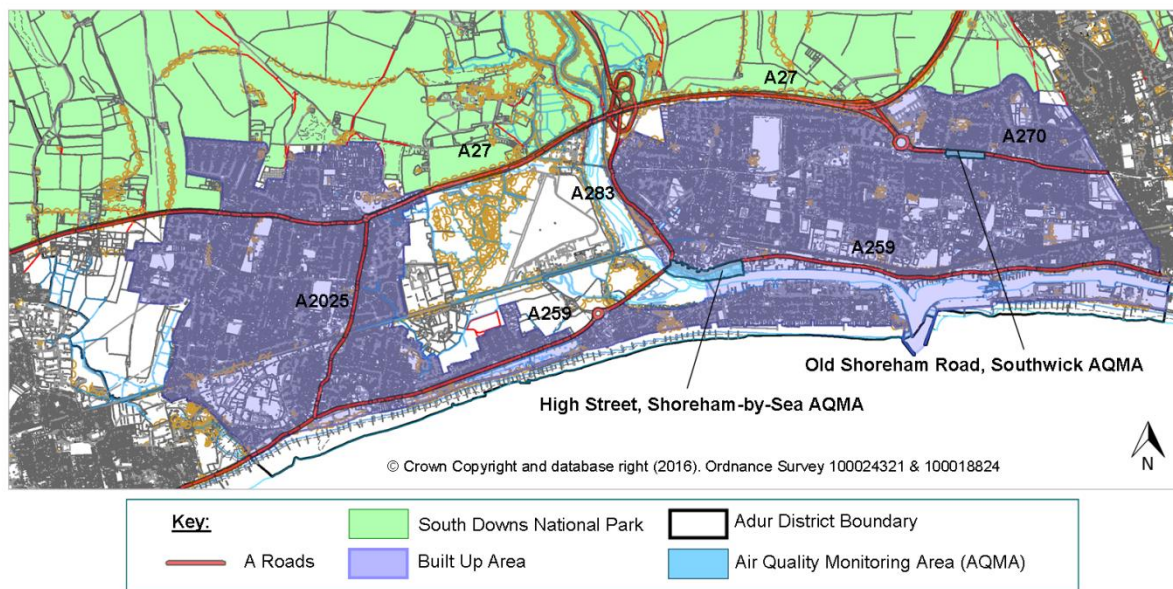
A significant amount of land in Adur is subject to tidal flooding due to the presence of the River Adur and the district's coastal location. Sea level rises associated with climate change may affect communities residing along the coastal strip and adjacent to the River Adur. There are also surface water and groundwater flooding issues in the district due to the topography and geology (chalk) of the area.

Figure 7.4: Flood risk



- 7.3.5 The Environment Act 1995 requires Local Authorities to assess air quality and establish Air Quality Management Areas to ensure air quality problems are dealt with. Under this Act, a wide range of pollutants are monitored. Currently there are two areas in Adur which show high concentrations that are likely to exceed the specified threshold levels at which damage to health is considered likely. These areas have been designated Air Quality Management Areas and are generally related to high levels of traffic pollution on the High Street in Shoreham and the Old Shoreham Road in Southwick.

Figure 7.5: Air quality Management Areas (AQMAs)



- 7.3.6 Adur's water is supplied by an underlying chalk aquifer which follows the general boundary of the South Downs National Park. The Environment Agency has classified the district as falling within an area of serious water stress, where demand for water is high and resource availability is low. The groundwater quality of Adur is currently classified as 'Good' in the South East River Basin Management Plan (2009).
- 7.3.7 There are three water bodies in Adur that are failing to achieve good ecological status as defined by the Water Framework Directive. The Teville Stream is the most seriously affected, the other two being the River Adur estuary and the Ladywell Stream. The River Adur is classified as a 'Transitional Water Body' of 'moderate' quality with the aim of no deterioration of that quality (as a minimum).
- 7.3.8 As of 2015, bathing water quality at Southwick and Shoreham Beach achieved 'Excellent' status whereas bathing water quality at Lancing only achieved 'Sufficient' status.⁶

7.4 Socio-economic characteristics of the district

- 7.4.1 Adur is ranked as the most deprived Local Authority in West Sussex, and 150th nationally (out of 326, where 1 = most deprived). Of the top 9 most deprived wards in West Sussex, two are in Adur – Eastbrook and Southlands. These two wards also fall within the 20% most deprived wards in England. The main deprivation issues in the Eastbrook ward relate predominantly to education although also health and disability.

⁶ Adur District Council (2015)

- 7.4.2 Life expectancy for males in Adur is 80 years which is slightly higher than the national average of 79 years, and life expectancy for females is 84 years which is also slightly higher than the national average of 83 years. However, it should be noted that there is a stark difference in life expectancy between the most deprived and the least deprived wards in Adur (7.1 years for men and 6.7 years for women).⁷
- 7.4.3 16% of children aged 10-11 in Adur are obese which is lower than the national average of 19%. 18% of adults in Adur are obese which is also lower than the national average of 23%.⁸
- 7.4.4 There is a high demand for affordable housing in the district which significantly exceeds supply. A total backlog need for affordable housing across Adur of 564 was estimated in the 2012 SHMA, based on information available from the Council's Housing Register at that time and applying an affordability test. The latest evidence from the Council's Housing Register (as of 2014) indicates that there are now 664 households on the housing register and in need (i.e. in a reasonable preference category).
- 7.4.5 Adur has a less skilled population than comparator areas with only 28% of 16-64 year old residents educated to NVQ4 and above, compared to 39% across the South East. However, the District has a relatively high proportion of persons qualified to NVQ1 and above (93.6%) and NVQ2 and above (77.7%).⁹ Overall, there are lower levels of people with higher, degree-level qualifications resident in the district.¹⁰
- 7.4.6 Adur is relatively well served by public transport. There are 4 rail stations in the district, a regular coastal bus service, and other bus services within the area that offer good general coverage of the local road network
- 7.4.7 The district is well connected to the strategic road and rail networks between London and the south coast, with Gatwick Airport in relatively close proximity (approximately 35 miles). Adur has a number of well-established business areas including Lancing Business Park, Dolphin Road Industrial Estate, Shoreham Harbour and Shoreham Airport but there is a scarcity of readily available land for new economic development.
- 7.4.8 The public services sector provides the largest number of jobs in Adur (24% of jobs). This includes local government, education, health, defence and policing. Other large sectors in Adur, in terms of total employment, include wholesale and retail (22%), **financial and other business services (17.4%)**, and manufacturing (13%).¹¹ In comparison to West Sussex, the South East and the rest of the UK, Adur's strongest sectors are extraction and mining, manufacturing and construction.¹²
- 7.4.9 A significant proportion of residents commute to work outside of the district. The 2011 Census shows that of those living in the district and in work, only 44% either work in the District, at home or have no fixed place of work. 22.4% of Adur residents in work, work in Brighton and 14.3% work in Worthing. As of 2014, 79% of the working age (16-64) population in Adur were economically active which is slightly lower than the South East figure of 80%.¹³ In addition:
- Adur has a relatively low jobs density of 0.63. This figure represents a ratio of the number of jobs per each resident of working age in the district. This density is below that of the South East which has a jobs density of, on average, 0.81¹⁴.
 - As of 2013, there were approximately 2,185 businesses operating in Adur across 2,500 local units. The vast majority (89.2%) of the enterprises based in Adur are micro-businesses that employ less than ten people which is just below the South East figure of 89.4%. There are five large businesses in Adur employing 250 or more people.

⁷ Public Health England 2015

⁸ Public Health England 2015

⁹ ONS Population Survey 2014

¹⁰ Annual Population Survey (Average 2009-2013)

¹¹ ONS Business register and employment survey 2014

¹² Experian 2013.

¹³ ONS Annual Population Survey 2015

¹⁴ NOMIS 2012

- The average gross weekly wage for people who live in the district is £500 which is significantly less than the equivalent figure for the South East (£575) and Great Britain (£530).¹⁵
- As of 2011, 61% of the resident population were of working age which is below both the regional average of 64% and the national average which is also 64%. This is due to relatively high proportion of people aged 65+ in the district (Census 2011). Adur has a low percentage of 15-29 year olds compared to the South East. This is likely to partly be linked to both the lack of further education facilities and nature of the area/housing stock (which is relatively suburban in nature).

7.5 How might the baseline 'evolve' without the plan?

7.5.1 The discussion above has highlighted a number of trends over time that, it can be assumed, will continue into the future. In particular, it is possible to assume that the worsening of the District's 'performance' relative to other authorities in terms of the Index of Multiple Deprivation could continue to worsen over time, not least because of a lack of employment land will constrain economic growth. Likewise, the lack of a plan is likely to constrain housing growth in the longer term which will exacerbate the current need for affordable housing. In terms of environmental issues, the primary 'future baseline' consideration relates to climate change. Flood risk is set to worsen, and climate change will also have implications for water resources, biodiversity and other issues. Climate change will, of course, also impact on the 'communities baseline' locally.

¹⁵ Annual Survey of Hours and Earnings (2013)

The SA Report must include...

- Key problems / issues and objectives that should be a focus of / provide a framework for appraisal

8.1 Introduction

- 8.1.1 Drawing on the review of the sustainability context and baseline, the SA Scoping Report (2011) was able to identify a range of sustainability problems / issues that should be a particular focus of SA. Subsequent to further refinement of these issues a discrete list of key sustainability 'objectives' emerged.

8.2 Sustainability issues

Environmental

- Sensitive habitats are vulnerable to pressures associated with development and climate change.
- Adur's distinctive historic and built heritage is similarly at risk.
- Climate change will lead to sea level rise and more frequent and extreme weather events including flooding and droughts.
- High water stress - due to high per capita use and relatively high population density – is set to worsen as a result of sub-regional population growth and climate change.
- Vital groundwater supplies are vulnerable to pollution.
- Traffic congestion is prevalent along main road networks.
- Poor air quality exists on High Street, Shoreham and Old Shoreham Road, Southwick (both designated Air Quality Management Areas)

Economic

- Lack of move-on accommodation and high quality business units
- Shortage of good quality unconstrained employment land
- High levels of congestion on the A259 and A27
- Low level of skills
- Low wages
- There is a need to ensure that Adur's town centres remain healthy and vibrant into the future.

Social

- Low educational attainment
- Low level of skills
- Perceived crime and antisocial behaviour
- Health inequalities due to deprivation issues
- Poor living environment in some areas
- An ageing population (although this is as much a national issue as a local one) with implications for demands on health and social care
- Climate change will impact on vulnerable groups (e.g. heat waves can impact the elderly)
- Housing need - i.e. a need for a mix of homes including affordable homes
- Deprivation and social exclusion in areas where access to services, housing and education is poor.

8.3 Sustainability objectives

- 8.3.1 Table 8.1 presents a concise list of sustainability objectives and ‘supporting criteria’ that reflect the sustainability issues identified (following context and baseline review). The list of sustainability objectives and supporting criteria provides a methodological ‘framework’ for appraisal, ensuring that it remains focused and concise.
- 8.3.2 The ‘supporting criteria’ have been updated slightly since 2011, i.e. since the time of the scoping consultation.

Table 8.1: The SA framework

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
1. Increase energy efficiency and encourage the use of renewable energy sources	<ul style="list-style-type: none"> Promote low/zero carbon development? Affect both new development and existing buildings? Support renewable energy developments / installations or schemes for energy efficient supply? Support reduced average annual domestic consumption of electricity and gas? Support reduced average annual commercial and industrial consumption of electricity and gas?
2. Protect and enhance water quality and encourage the sustainable use of water	<ul style="list-style-type: none"> Protect the quality and quantity of groundwater in the district from the detrimental impacts of development? Encourage greater efficiency in the use of water, helping to ensure reduced average per capita consumption of water? Ensure no deterioration of waterbodies designated under the Water Framework Directive and help to ensure that waterbodies achieve at least good ecological status or good ecological potential by 2015? Promote use of SuDS?
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials	<ul style="list-style-type: none"> Direct development to brownfield areas before greenfield? Support remediation of contamination as part of the redevelopment of brownfield sites?
4. Conserve, protect and enhance biodiversity (flora and fauna) and habitats	<ul style="list-style-type: none"> Help to ensure that biodiversity (and the habitats that support it) is protected and, where possible, enhanced and that capacity exists to allow adaptation to a changing climate? Achieve a net gain in biodiversity locally? Contribute to any of the Biodiversity Opportunity Areas? Will the Plan enhance biodiversity through the provision of green infrastructure?
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes	<ul style="list-style-type: none"> Maintain and enhance local distinctiveness? Protect and enhance heritage assets in-line with established strategies (e.g. conservation area appraisals)? Address listed buildings and Conservation Areas at risk?
6. Protect and enhance the countryside	<ul style="list-style-type: none"> Help to maintain and enhance the natural and built environment of the district, ensuring that it is not adversely affected by development? Minimise development outside the built up area boundary, and in particular within the National Park?

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
7. Protect and enhance public open space / green infrastructure and accessibility to it	<ul style="list-style-type: none"> • Prevent inappropriate development on accessible public open space and other key areas of green infrastructure? • Facilitate a green infrastructure network, e.g. by supporting the provision of multifunctional green space including open green space, sustainable drainage and biodiversity? • Protect playing fields and indoor and outdoor sports facilities? • Maintain and, where possible, enhance the amount of open space in the district per 1000 population?
8. Reduce pollution and the risk of pollution to air, land and water.	<ul style="list-style-type: none"> • Protect surface watercourses or groundwater protection zones? • Facilitate necessary upgrades to infrastructure associated with foul and surface water? • Address air quality within AQMAs? • Reduce levels of noise, vibration and light pollution? • Contribute to a reduction in CO₂ emissions per capita?
9. Ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events	<ul style="list-style-type: none"> • Encourage adaptation techniques? • See criteria relating to other SA objectives on water, energy efficiency, biodiversity etc.
10. Improve health and wellbeing and reduce inequalities in health	<ul style="list-style-type: none"> • Facilitate healthy lifestyles, including participation in sport? • Help secure necessary health related infrastructure? • Help to address existing health issues?
11. Reduce crime, the fear of crime and antisocial behaviour	<ul style="list-style-type: none"> • Improve community safety? • Help to ensure crime prevention measures are incorporated into new and existing development?
12. Promote sustainable transport and reduce the use of the private car	<ul style="list-style-type: none"> • Promote alternative modes of transport to the car. • Help reduce the need to travel, including by establishing a more sustainable pattern of settlements? • Integrate land uses, transport infrastructure and public transport? • Increase the carbon efficiency of transport networks? • Promote mixed use, and higher density development, which has adequate public transport infrastructure?
13. Reduce poverty, social exclusion and social inequalities	<ul style="list-style-type: none"> • Help to minimise discrimination related to age, gender disability, race, faith, location and income? • Address issues highlighted by the Index of Multiple Deprivation dataset? • Address issues of fuel poverty?
14. Meet the need for housing and ensure all groups have access to decent / appropriate housing	<ul style="list-style-type: none"> • Support increased dwelling (including affordable housing) completions? • Help to reduce the number of households classified as having priority needs on the housing register?
15. Create and sustain vibrant communities which recognise the needs and contributions of all.	<ul style="list-style-type: none"> • Encourage mixed communities? • Secure the necessary infrastructure to support communities?

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy.	<ul style="list-style-type: none"> • Support the retention and modernisation of existing businesses and ensure the provision of infrastructure, services and facilities essential to support new employment opportunities? • Support an increase in additional employment floorspace per annum? • Help to attract younger people to live and work in the district? • Provide a focus on achieving vital and viable town centres (Shoreham, Southwick and Lancing) and regenerating deprived areas? • Support an increase in average gross weekly earnings? • Facilitate a sustainable visitor economy?
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development	<ul style="list-style-type: none"> • Facilitate the improvement of coastal defences? • Promote a sequential approach to avoid development in areas at risk of flooding? • Promote use of SuDS? • Address coastal erosion? • Work with natural processes and have regard to biodiversity?
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres	<ul style="list-style-type: none"> • Help to improve accessibility to existing services/facilities? • Secure new infrastructure and/or encourage better use of existing? • Maintain/enhance the amount of floorspace provided for 'town centre uses' within town centres?
19. Create places, spaces and buildings that work well, wear well and look good.	<ul style="list-style-type: none"> • Promote high standards of design?
20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs.	<ul style="list-style-type: none"> • Ensure adequate provision of skills/training facilities? • Improve accessibility to existing educational facilities? • Facilitate the provision of new educational facilities? • Target lower super output areas in Adur within 10% most deprived in England in respect of education, skills and training?
21. Reduce the amount of domestic and commercial waste going to landfill as per the waste hierarchy.	<ul style="list-style-type: none"> • Ensure that provision for waste is adequate for the current and future development needs, bearing in mind that the land available to dispose of this waste (landfill sites) is reducing? • Improve access to recycling and other waste management facilities?

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

9 INTRODUCTION (TO PART 2)

The SA Report must include...

- An outline of the reasons for selecting the alternatives dealt with
- The likely significant effects on the environment associated with alternatives
- Outline of the reasons for selecting the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan)

9.1.1 The aim of this Part of the SA Report is to explain the 'story' of plan-making / SA up to this point, i.e. up to the point where a proposed submission version of the plan is published for consultation.

9.1.2 Specifically, in-line with Regulations¹⁶, it is the aim of this Part of the SA Report to present information about the '**reasonable alternatives**' that have been subjected to SA, and how this work has fed-into the plan.

9.1.3 Aside than through appraisal of reasonable alternatives, SA has also fed-in in other ways. Specifically, there has been an iterative approach taken to the appraisal of the draft plan as it has emerged. More about this is explained in Part 3 of this SA Report.

9.1.4 It should be noted that an additional Regulation 18 consultation was undertaken in December 2015 regarding proposed amendments to the New Monks Farm allocation in the Proposed Submission Adur Local Plan 2014. These amendments are explained and assessed in this part of the SA Report.

Which plan issues have been the focus of alternatives appraisal?

9.1.5 A number of key / contentious plan issues have been the focus of alternatives appraisal. First and foremost, effort has gone into the appraisal of **spatial strategy** alternatives, i.e. alternative approaches to addressing the question '*How much housing growth should be accommodated in Adur, and where should it be directed to?*'

9.1.6 Other less strategic plan issues have also been the focus of alternatives appraisal:

- **Shoreham airport development** (*What should be the broad strategy?*)
- **Development of a new roundabout on the A27** (*Where should it be located? – see assessment of Regulation 18 consultation December 2015*)
- **Amendments to the New Monks Farm policy/site allocation**

9.1.7 For reasons described in section 13, the most recent **Objectively Assessed Need for Housing** – 291 dwellings per annum, 5,820 dwellings over the plan period – was also assessed and compared against the housing target of 3,609 included in the Proposed Submission Adur Local Plan 2016.

9.1.8 Whilst alternatives could potentially have been appraised for other plan issues besides, it was not deemed necessary ('reasonable') to do so. For example (and in particular):

- Alternatives could have been appraised in relation to the issue of **Affordable housing** (What developments should be required to contribute towards affordable housing provision, and what level of contribution should be sought?), but in practice this would have added little value. The preferred approach emerged (and is justified) on the basis of technical evidence (e.g. work undertaken into 'viability') and evidence gathered through consultation on a draft approach.

¹⁶ In-line with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present an appraisal of "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" whilst in-line with Schedule 2(8) there is a need to explain "the reasons for selecting the alternatives dealt with".

- Alternatives could have been appraised in relation to the issue of **Employment growth** (What should be the broad strategy?), but in practice this would have added little value.¹⁷ An Employment Land Review study was recently completed (updating a 2011 study) that shows high projected demand for employment floorspace. There is no potential to allocate enough land to meet this demand given capacity constraints and objectively assessed housing need, and so the approach being taken is simply to allocate the maximum amount of land possible. There is no alternative approach that might be taken / need reasonably be the focus of appraisal. It is not the case that any of the sites that have been considered and discounted for strategic housing development (see 10.2 and Appendix III) could be suitable for employment development. Landscape constraints apply equally to employment development, as do, to some extent, the flood risk constraints identified for the Hasler Estate.
- Alternatives could have been appraised in relation to **Gypsies and Traveller accommodation needs** (*Where should new pitches be located?*), but in practice this would have added little value. Given that much of Adur's Gypsy and Traveller needs come from expanding families at the existing site at the Withy Patch, an expansion of the site is considered the most appropriate way to address needs. It is recognised that the Withy Patch site is currently at risk of flooding and any allocation in the existing Local Plan for its expansion would conflict with the NPPF; however, as part of the works associated with a new roundabout to serve New Monks Farm and Shoreham Airport there are opportunities to raise the Withy Patch site and adjacent land out of flood zone 3 (see assessment of Regulation 18 consultation December 2015 in Section 12 and Appendix VI).
- Once this land has been raised, the Council will produce a Gypsy and Travellers DPD which will outline how the Council intends to meet needs.

Structure of this Part of the SA Report

9.1.9 A chapter is dedicated to each of the plan issues listed above that have been addressed via SA of reasonable alternatives. The following questions are answered in each chapter:

- 1) What are the reasons for selecting the alternatives considered?
- 2) What are the alternatives appraisal findings?
- 3) What are the reasons for selecting the preferred approach (i.e. developing the draft plan) subsequent to and in-light of alternatives appraisal?¹⁸

¹⁷ In fact, two employment growth alternatives – a 'baseline scenario' and an 'economic intervention scenario' - were appraised and published for consultation in 2011. Appraisal findings are not dwelt-on, however, at the current time on the basis that they are no longer entirely relevant given the most recent evidence.

¹⁸ The requirement to explain 'reasons for selecting the alternatives dealt with' is understood to have a dual meaning: 1) explain reasons for selecting the alternatives considered; and 2) explain reasons for subsequently selecting the preferred option / developing the preferred approach.

10 SPATIAL STRATEGY ALTERNATIVES

10.1 Introduction

- 10.1.1 As discussed above, the need to identify a spatial strategy is the key issue to be addressed through the Local Plan, and hence it is appropriate ('reasonable') that it has been the focus of alternatives appraisal. This Chapter explains the full 'story' of alternatives consideration, from the selection of reasonable alternatives to the selection of a preferred approach in light of appraisal findings.

10.2 Reasons for selecting the alternatives considered

- 10.2.1 The discussion set out below seeks to explain the process undertaken in order to identify 'reasonable' spatial strategy alternatives. In other words, the discussion sets out to demonstrate the 'reasonableness' of the alternatives.

- 10.2.2 Essentially, spatial strategy alternatives were identified subsequent to consideration of '**top-down**' and '**bottom-up**' considerations.

'Top-down' considerations

- 10.2.3 In 2011, subsequent to a Locally Generated Housing Needs (LGHN) study, four alternative housing growth quantum options were identified, subjected to appraisal and consulted upon within the 'Housing and Employment Options' consultation document. The housing growth quantum options were as follows:¹⁹

- 1) 1105 homes 2011-2028 (65 p.a.)
- 2) 1785 homes 2011-2028 (105 p.a.)
- 3) 2635 homes 2011-2028 (155 p.a.)
- 4) 4590 homes 2011-2028 (270 p.a.)

- 10.2.4 Detailed appraisal findings can be found within the Interim SA Report published alongside the plan consultation document at the time, and summary appraisal findings are presented in **Appendix II** of this report.

- 10.2.5 Subsequent to appraisal / consultation, it was determined that a high growth approach (i.e. **270** homes p.a) need not be given further consideration, i.e. it need not be taken into account when developing spatial strategy alternatives. There was confidence at the time (and this remains the case) that no spatial approach could be taken that would enable this level of growth to be delivered sustainably. Whilst achieving this level of growth would enable housing needs to be met, it would lead to a severe impact on the Local Green Gaps, the landscape quality of Adur, biodiversity, risk of flooding and transport infrastructure / traffic congestion.

- 10.2.6 Subsequent to the 2011 consultation, Adur and neighbouring authorities within the Housing Market Area commissioned an update of the Coastal West Sussex Strategic Housing Market Assessment (SHMA). The study looked at housing need at the Housing Market Area scale, and also how development might be distributed between authorities, given varying capacity / constraints. The study found that development requirements for Adur were in the region of 215 homes p.a. or **230** if the intention was to meet the backlog of affordable housing need (564 households).

¹⁹ Two employment growth options were also subjected to appraisal and consultation at this time: 1) Baseline Scenario; and 2) Economic Intervention Scenario. Appraisal findings are no longer entirely relevant as they were based on evidence that is now out of date. It is the case that the preferred approach to employment land has been determined solely in-light of the technical evidence-base, i.e. an understanding of demand on the one hand, and capacity on the other. In other words, there is no policy choice to be made through the plan in relation to the employment floorspace strategy. See further discussion above, in Chapter 9.

- 10.2.7 However, the study also recognises that this figure (230 homes p.a.) is somewhat aspirational, and that delivery of a maximum of **180 – 200** homes per year across the plan area might be achievable (subject to further detailed assessment, and given the assumption that significant public sector support is available). The study notes that the Council is evidently making serious attempts to meet its own development needs, through considering options within the Local Green Gaps, but that the geography of Adur means that there are increasingly fewer opportunities to do so which are consistent with achieving sustainable development. It states:
- “Given the geography of the District and development constraints which exist, it seems likely that rates of development in Adur District outside of the National Park will fall short of meeting the District’s full development needs. It does not seem feasible that the Adur Local Plan will be able to meet any unmet requirements from neighbouring authorities”.*
- 10.2.8 Further updates to the housing needs work were undertaken in 2014 and 2015. The 2015 study ‘Objectively Assessed Need (OAN) for Housing: Adur District’ uses an updated set of demographic projections as well as taking account of the Government’s Planning Practice Guidance published in 2014. This study supersedes all previous Objectively Assessed Need Assessments and recommends the delivery of 291 dwellings per annum (5,820 dwellings over the Plan period). Although the figure of 270 dwellings per annum had previously been assessed and it was concluded that the negative impacts associated with this level of housing delivery would be too great, this assessment was undertaken in 2011. It was therefore considered that the new OAN should be assessed given that a lot of work has been undertaken since 2011 to further understand the development opportunities and constraints in the district. This assessment is detailed in section 13 of this part of the Plan and it can be seen from the conclusions that the environmental impact of meeting the OAN is consistent with the 2011 assessment of 270 dwellings per annum.
- ‘Bottom-up’ considerations**
- 10.2.9 Alongside consideration of the housing growth quantum options that needed to feed-into spatial strategy alternatives, there was a need to give consideration to the site options that should feed-in. Site options were identified through a Strategic Housing Land Availability Assessment (SHLAA) study (2009 & 2012 update), and also through an Urban Fringe Study (2006). Several other site options were also identified throughout the Local Plan process, including the western arm of Shoreham Harbour, the Shoreham Gateway site and the Police Station site on Ham Road in Shoreham.
- 10.2.10 In total, 19 site options – both greenfield and brownfield - were subjected to appraisal.²⁰ No site options were screened-out / not subjected to detailed appraisal.²¹ Maps showing the location of all site options are presented below. It is worth pointing out that the majority of greenfield site options identified (as available / potentially suitable) fall within Lancing and Sompting.
- 10.2.11 The appraisal of site options involved application of a bespoke methodology, which was developed to reflect the agreed SA Framework (see Chapter 8). It was not possible to appraise site options in terms of some SA objectives, including: Objective 1 (Energy Efficiency), Objective 11 (Crime), Objective 14 (Housing) given available evidence-base / the need to make minimal assumptions about the nature of development that might occur at any given site (and hence ensure a consistent appraisal of site options, i.e. the appraisal of site options ‘on a level playing field’).
- 10.2.12 Detailed appraisal findings can be found in **Appendix III**.

²⁰ Appraisal of site options has occurred ‘over time’, i.e. whilst the majority of site options were appraised in 2012, some have been appraised more recently. None of the more recent site options appraisals gave rise to a need to revisit the spatial strategy alternatives, which were established in 2012.

²¹ Please note however that four sites that were appraised as part of the SA of the Adur Local Plan in 2014 have not been included in the site appraisal process this time. These sites are: Land at Ropetackle North (this site now has outline planning permission and therefore no longer needs to be appraised); Land at Northbourne Medical Centre (the owners of this site no longer wish to develop it); Land at Southlands Hospital (this site now has planning permission and therefore no longer needs to be appraised) and Eastbrook Allotments (this site is no longer considered suitable for residential development due to significant development constraints).

Figure 10.1: Site options that were a focus of appraisal – Map 1 – Sompting

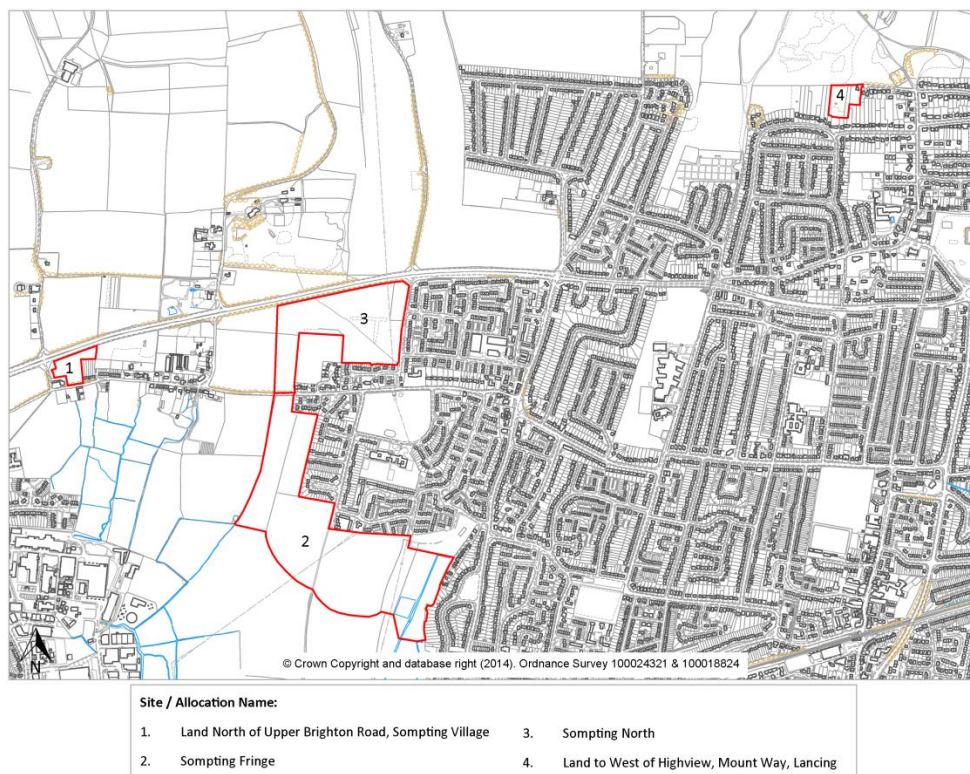
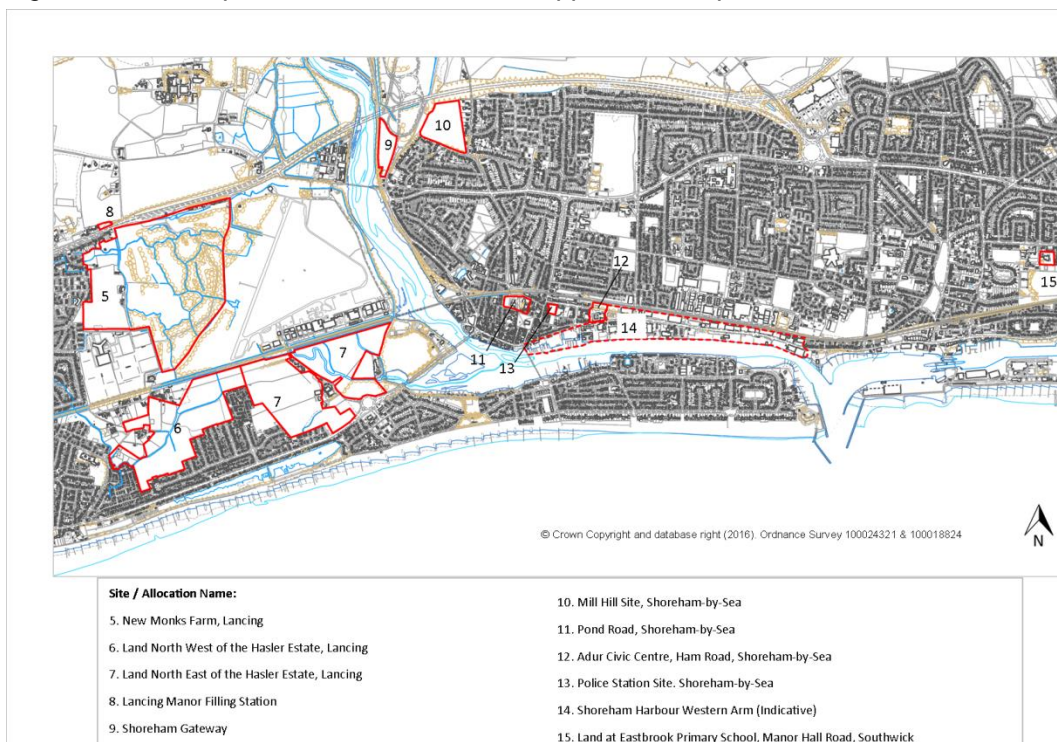


Figure 10.2: Site options that were a focus of appraisal – Map 2 - Shoreham



Selecting spatial strategy alternatives

- 10.2.13 Table 10.1 presents the spatial strategy alternatives that were identified in 2012 subsequent to 'top-down' consideration of growth quantum options and 'bottom-up' consideration of site options.
- 10.2.14 These alternatives were appraised in 2012, with appraisal findings presented within the Interim SA Report published alongside the Draft Adur Plan. Appraisal findings were also presented within the Interim SA Report published alongside the Revised Draft Adur Local Plan, in 2013.
- 10.2.15 These alternatives were considered in 2012/2013 to represent the 'reasonable' alternatives, and are still considered to represent the reasonable alternatives, i.e. nothing has come to light since the 2013 consultation to suggest that there is any other option that should reasonably have been appraised.

Table 10.1: Spatial strategy alternatives

	New homes on greenfield land	New homes at Shoreham Harbour	New homes on brownfield land	Total new homes	Total new homes per annum
A1	<ul style="list-style-type: none"> 450 at New Monks Farm, Lancing 250 at Sompting Fringe 300 at Hasler, Lancing 	1050	870	2920	146
A2	<ul style="list-style-type: none"> 450 at New Monks Farm, Lancing 450 at Hasler, Lancing 	1050	870	2820	141
A3	<ul style="list-style-type: none"> 450 at New Monks Farm, Lancing 420 at Sompting Fringe 	1050	870	2790	140
B	<ul style="list-style-type: none"> 600 at New Monks Farm, Lancing 600 at Hasler, Lancing 420 at Sompting Fringe 210 at Sompting North 	1050	870	3750	188

10.2.16 There are a number of points to note regarding the spatial strategy alternatives:

- None of the options would involve a scale of growth necessary to meet current housing need.
- There is only one 'B' option on the basis that no other site options are available and potentially suitable/sustainable (in-light of the site options appraisal findings) that would enable this level of growth to be achieved.
- A 1050 home scheme at Shoreham Harbour is assumed to be 'a given', i.e. alternative approaches need not be considered. An Area Action Plan is already being progressed jointly between Adur DC, Brighton & Hove City Council and West Sussex County Council, with a view to ensuring clarity and certainty for stakeholders as to the future of the harbour. There is a long history of considering options, dating back to 2006 (when options were considered by the South East England Development Agency) and beyond.
- 870 homes on brownfield land is assumed to be a given. The preferred approach reflects site specific considerations, as established through site options appraisal.
- The four greenfield site options reflected in the spatial strategy alternatives - New Monks Farm, Lancing; Hasler, Lancing; Sompting Fringe; and Sompting North – are generally those that were shown to perform relatively well by the site options appraisal (see Appendix III), although there is a need to qualify this statement, with regards to the **Hasler, Lancing site option** as follows:

The Hasler, Lancing site option was identified as performing relatively well in 2012, and hence was included within the alternative spatial strategies. However, subsequent consultation with the Environment Agency and the Council's engineers identified concerns relating to flood risk, specifically ground water and surface water flooding. It is not clear that ground water and surface water flooding on site can be mitigated at this stage without worsening flood risk elsewhere and despite a number of requests to the landowner, no evidence has been submitted in this regard. As a result, the site is not being taken forward as an allocation. However, **despite major question-marks surrounding deliverability, it remains appropriate to include the Hasler site within the spatial strategy alternatives.** The assumption that it is deliverable enables the testing of alternative spatial approaches to delivering a low growth approach, and the testing of a high growth approach. There are no other greenfield site options that could be substituted for the Hasler site, as discussed in **Box 10.1**

Box 10.1: Discussion of 'other' greenfield site options

As discussed above, the 'reasonable spatial strategy alternatives' vary in terms of the quantum of growth at four greenfield site options:

- New Monks Farm, Lancing
- Hasler, Lancing
- Sompting Fringe and Sompting North (cumulatively known as West Sompting)

Whilst there are other greenfield site options, these need not 'reasonably' feed into the consideration of spatial strategy alternatives given that they can be shown – through appraisal in isolation – to be severely constrained or otherwise inappropriate for development. Presented below is a short discussion for each of the 'other' greenfield site options, highlighting the key constraints that mean that they need not ('reasonably') be appraised as part of a spatial strategy option.

More detailed appraisal findings in relation to these site options can be found in **Appendix III**.

Land to North East of Hasler Estate

In addition to the significant flood risk issues that this site shares with the Hasler site included in the spatial strategy alternatives, this site makes a significant contribution to the Shoreham-Lancing gap and development in this location could compromise the integrity of the gap as well as having an impact on views across the gap north-south and east-west.

Land North of Upper Brighton Road, Sompting Village

The site is located within the Sompting Village Conservation Area which is also within the Sompting/Lancing & Worthing Local Green Gap and designated as Countryside. As a result, development of the site would have a negative impact on both the Local Green Gap and the rural and historic character of the Conservation Area.

Shoreham Gateway

The site is located within the Shoreham-Lancing Gap. Although the site is on the edge of the gap, it makes a significant contribution to the setting of the River Adur and acts as a gateway to both Shoreham and the National Park. The site is an important part of the gateway sequence of views and spaces on the northern edge of Shoreham and the development of the site would be an unwelcome urbanisation. Also, the majority of the site is located within Flood Zone 3a and there are surface water and potentially significant groundwater flooding issues.

Mill Hill Site

The site is greenfield, located within the countryside, is of high overall landscape sensitivity and is clearly visible from sensitive views in the National Park.

Land to West of Highview, Mount Way, Lancing

Although this site is greenfield, it is located within the Built Up Area Boundary and development is assumed to be a 'given'. As a result, it has not been reflected in the spatial strategy alternatives.

10.3 Appraisal findings

Introduction

- 10.3.1 This section presents summary appraisal findings in relation to the spatial strategy alternatives introduced in Table 10.1, above. Detailed appraisal findings are presented in **Appendix IV**.

Options A1, A2 & A3

- 10.3.2 Overall, these options were found to be relatively similar in relation to their impacts on the 21 Sustainability Objectives. Option A3 is preferable with regard to minimising flood risk – given that it does not include the Hasler Estate which is predominantly located within flood zone 3 - but is likely to have a greater impact on the historic character of the district due to the higher amount of land allocated in the Lancing/Sompting – Worthing gap at Sompting Fringe. Option A2 is the least preferable option (not including option B) regarding flood risk due to the higher amount of land allocated at the Hasler Estate. However, a benefit of directing growth to the Hasler site would relate to 'landscape' objectives, given that the site is less sensitive from a landscape point of view than Sompting Fringe.
- 10.3.3 None of these options score as well as option B in relation to the social and economic Sustainability Objectives given that they provide significantly less housing. However, these three options are still considered to be proactive in that they allocate significant amounts of greenfield land in order to provide further housing in the district, while at the same time aiming to strike a balance between development needs and environmental issues/constraints.

Option B

- 10.3.4 Due to the amount of development proposed under this option, it would have a number of potentially significant negative impacts specifically in relation to the countryside, pollution and flood risk objectives.
- 10.3.5 With regard to the countryside, this option proposes a significant level of development on greenfield sites and would lead to the loss of a notable amount of countryside within Adur. A significant amount of this development would also take place within flood zone 3 clearly conflicting with the Council's objective of avoiding and reducing flood risk. On the whole this option scores negatively in relation to the environmental objectives.
- 10.3.6 However, there are a number of social and economic sustainability benefits associated with this option due to the level of housing being provided (188 new homes per annum) and the increased labour supply that this would provide. Compared with options A1, A2 and A3, this option scores particularly positively in relation to meeting housing needs. It is clear, however, that these benefits, to some degree, come at the expense of the environment.

10.4 Outline reasons for selecting the preferred approach

Introduction

10.4.1 This section explains the Council's reasons for developing the preferred spatial strategy – as set out within the Proposed Submission Plan – subsequent to / in-light of the alternatives appraisal.

The Council's 'outline reasons'²²

- 10.4.2 The preferred strategy is to
- Support development in principle within the Built Up Area Boundaries (BUAB) of Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate.
 - Focus development at Shoreham Harbour (with delivery through an Area Action Plan being prepared jointly with Brighton & Hove City Council and West Sussex County Council) and new employment floorspace at Shoreham Airport.
 - Develop greenfield sites at New Monks Farm, Lancing (residential, employment, and community uses), and West Sompting (residential).
- 10.4.3 Development which would result in the coalescence or loss of identity of settlements will be resisted; the character of Sompting village, which lies outside of the Built Up Area Boundary, will be respected and maintained; and the Hasler Site, Lancing will not be allocated because of flood risk concerns.
- 10.4.4 Essentially, the preferred spatial strategy aims to:
- Work towards meeting the objectively assessed development needs of Adur as far as possible, taking into account environmental constraints (most notably flood risk, landscape and coalescence issues), the capacity of infrastructure and the aim of retaining Local Green Gaps to maintain the character and identity of settlements within the district;
 - facilitate the regeneration of Adur; and
 - meet other plan objectives.
- 10.4.5 Whilst the strategy reflects a desire to proactively meet housing needs, provide employment sites for new or expanding businesses and facilitate the delivery of infrastructure, it is recognised that local people will still travel to jobs, and use retail, leisure or other services in other areas. Adur's role is to complement, not compete with other neighbouring centres.
- 10.4.6 Realistic options for locating development are extremely limited due to the compact size of the Local Plan area and its constrained location between the sea and the South Downs National Park. As a result, there are few real choices in terms of different locations or strategies if the Plan is to go as far as it can to realistically meet objectively assessed needs, without damaging its character and environment.
- 10.4.7 The strategy will result in a pattern of growth which maximises sustainability as far as is realistically possible. The proximity of proposed strategic greenfield sites adjacent to existing urban areas gives the opportunity for integration with existing communities and use of nearby facilities, services, and public transport. Strategic sites will also be required to deliver the infrastructure necessary to support them.
- 10.4.8 The proposed development strategy also takes account of the need to deliver jobs and employment land. Economic development and regeneration is a key priority of the Local Plan and is a priority shared by Coastal West Sussex, a partnership of local authorities. Coastal West Sussex is one of five local economies identified by the Coast to Capital Local Enterprise Partnership.

²² This text is repeated within the plan document

11 SHOREHAM AIRPORT ALTERNATIVES

11.1 Introduction

- 11.1.1 As discussed in Chapter 9, the need to identify a preferred strategy for Shoreham Airport is a key issue to be addressed through the Local Plan, and hence it is appropriate ('reasonable') that it has been the focus of alternatives appraisal.
- 11.1.2 This Chapter explains the full 'story' of alternatives consideration, from the selection of reasonable alternatives to the selection of a preferred approach in light of appraisal findings.

11.2 Reasons for selecting the alternatives considered

- 11.2.1 The leaseholders at Shoreham Airport are promoting 25,000sqm of employment floorspace, with approximately 10,000sqm in the north-west corner of the airport and 15,000sqm in the north-east. Given the airport is part of a very sensitive landscape but there is a significant need for new high quality employment floorspace in the district, it is considered by planning officers that further development should take place at the airport but only in the north east corner as this location is immediately south of an existing employment area (Ricardo) and doesn't have such a central location in the Local Green Gap as the north west development proposal. This view was informed by a 'Landscape and Ecology' study (2012) and a 'Shoreham Airport Proposed Development Masterplan – Broad Overview of Landscape and Visual Issues' study (2013).
- 11.2.2 In light of these considerations, the following alternatives were identified and subjected to appraisal:
- 1) Development in the north east corner only (see Figure 11.1)
 - 2) Development in the north east and north-west corner (see Figure 11.2)

Figure 11.1: Shoreham Airport Development – north east corner only

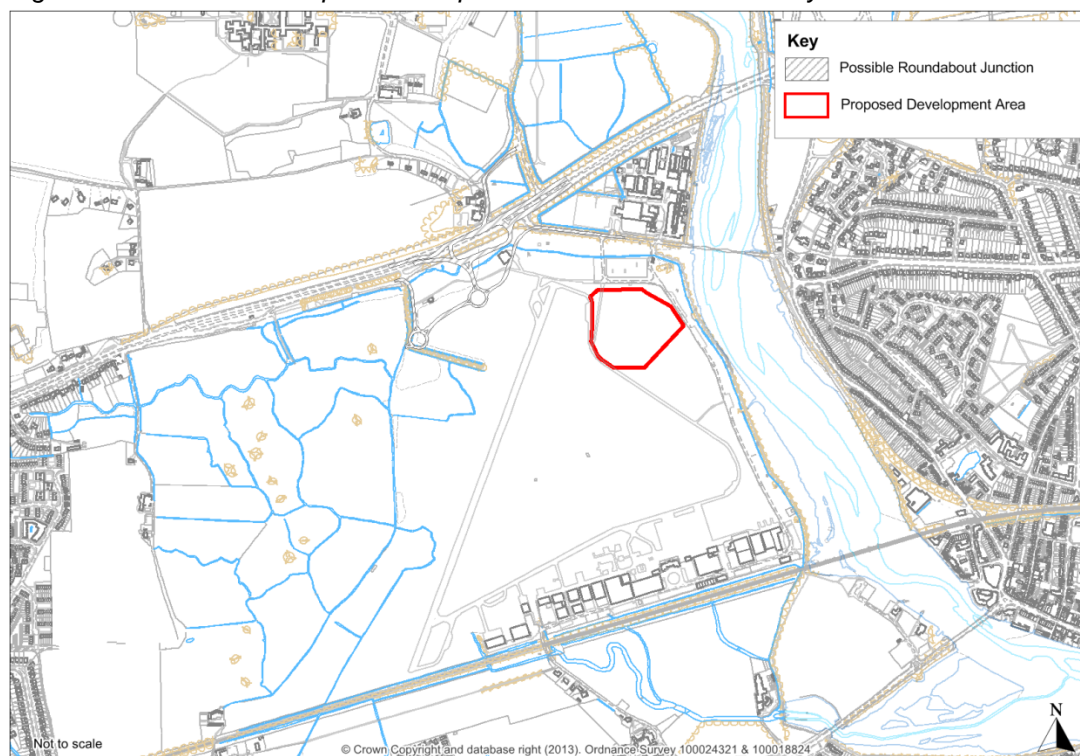
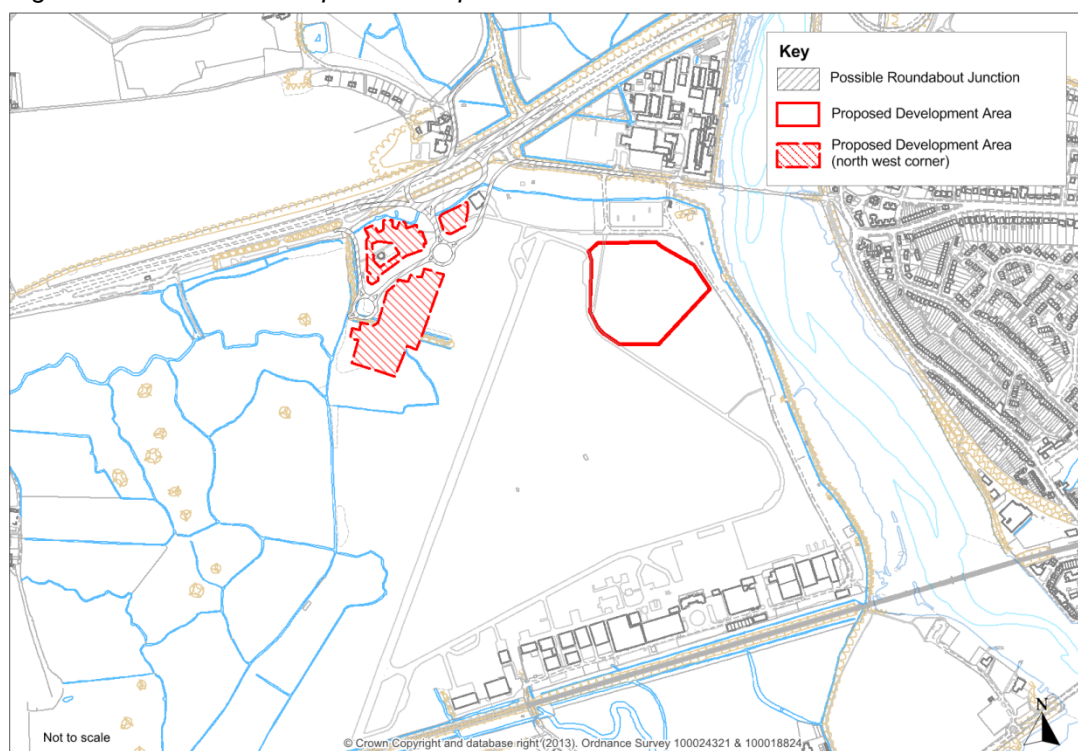


Figure 11.2: Shoreham Airport Development – north east and north west corner



11.3 Appraisal findings

Introduction

- 11.3.1 This section presents summary appraisal findings in relation to alternatives presented above. Detailed appraisal findings are presented in **Appendix V**.

Summary appraisal findings

- 11.3.2 Both options have a number of positive benefits in respect of the economic and social objectives. Option 2 scores particularly well in this regard. Neither option scores particularly well in respect of the environmental objectives, but Option 2 would clearly have more significant environmental impacts than Option 1 (particularly with regard to the historic environment, the countryside and flood risk).

11.4 Outline reasons for selecting the preferred approach

Introduction

- 11.4.1 This section explains the Council's reasons for developing the preferred approach – as set out within the Proposed Submission Plan – subsequent to / in-light of the alternatives appraisal.

The Council's 'outline reasons'

- 11.4.2 On balance, it is considered that Option 1 performs better as it would still have a number of social and economic benefits but without such a significant impact on the environment. Development would be visually intrusive and the landscape has a low capacity to accommodate this type of development without adverse effects on the character of the landscape and the way that it is perceived. Therefore minimising these impacts as much as possible while still providing some economic benefit is considered the most appropriate strategy and option 1 is therefore considered the most appropriate option.

12. REGULATION 18 CONSULTATION ON AMENDMENTS TO NEW MONKS FARM ALLOCATION WITHIN THE PROPOSED SUBMISSION ADUR LOCAL PLAN 2014

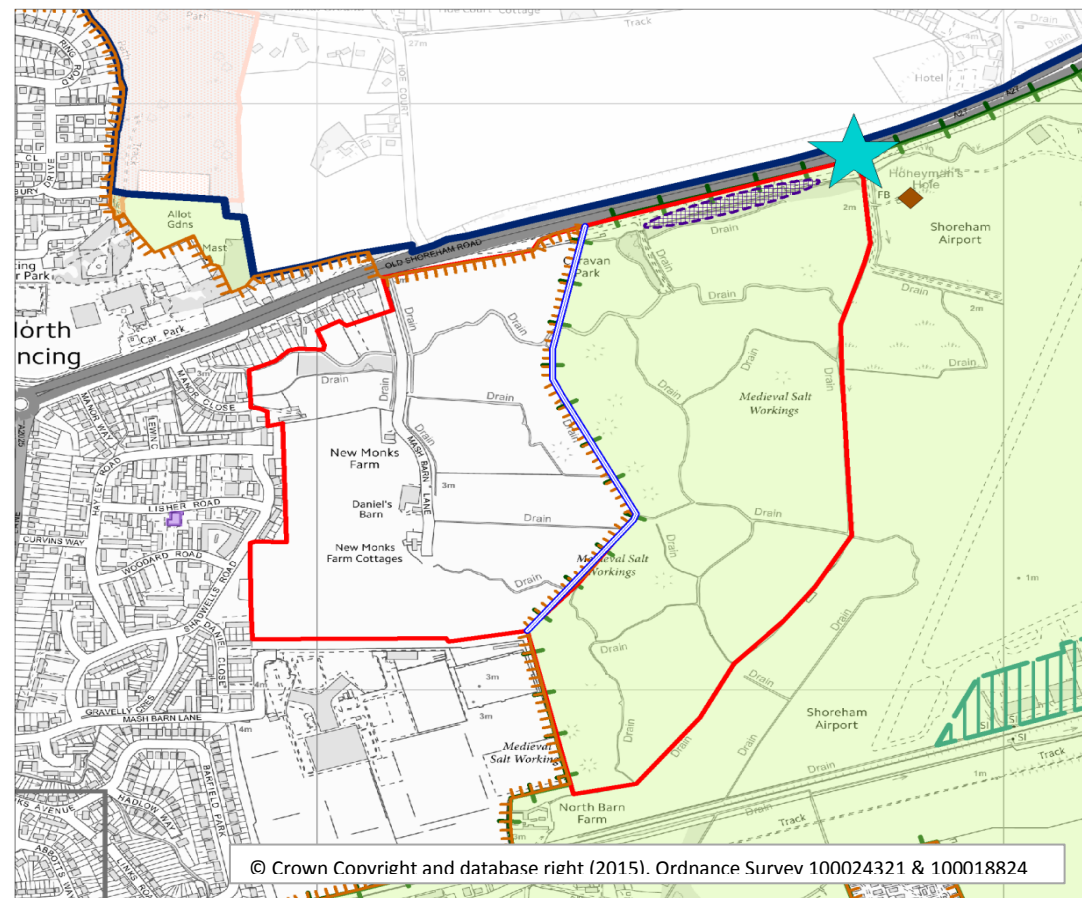
12.1 Introduction

12.1.1 In December 2015, a Regulation 18 consultation was undertaken on a number of proposed amendments to the New Monks Farm allocation. These amendments were as follows:

- 1) The number of potential homes is stated as 600.
Why? The previous plan gave a range of 450-600 homes, but the higher amount is likely to be required to make the development viable. Adur also has a significant need for new homes.
- 2) The indicative location of the proposed roundabout is moved eastwards to a more central location between the airport and New Monks Farm site.
Why? The previous version of the plan showed an indicative location for a roundabout onto the A27 at the western end of the allocation, although it also stated that an alternative access (a new roundabout at the Sussex Pad junction) was retained as a contingency. A more central roundabout location now appears achievable, and better serves the needs of both sites, as well as a number of other stakeholders in the area.
- 3) The existing Withy Patch travellers site is relocated westwards. There is also potential for a limited expansion to meet identified needs from within Withy Patch.
Why? A more centrally-located roundabout will impact on the existing Withy Patch site. Relocation provides an opportunity to improve the site and facilities, address flood risk and enable some limited future expansion to meet identified needs.
- 4) The site allocation boundary is amended, to include the existing Withy Patch site.
Why? Including this area within the site boundary will mean that the relocated site and flood risk improvements will be delivered as part of the development at New Monks Farm.
- 5) The proposed Built Up Area Boundary amendment is shown as indicative.
Why? The Built Up Area Boundary shows the boundary between the new built up area (where the housing and employment land will be) and the countryside and Local Green Gap (where the country park will be). At this point in time it is difficult to determine where exactly the best position for this boundary will be, as this will depend on detailed drainage work and landscape evidence, at the planning application stage.

The above amendments are shown in figure 12.1 below:

Figure 12.1 Proposed Amendments to Allocation at New Monks Farm



- Adur Local Plan Area
- Built Up Area (BUA) - Policy 2
- Indicative Built Up Area Boundary
- Strategic Site Allocations - Policies 5, 6, 7
- Potential Development Sites (in or on edge of Shoreham Town Centre) - Policy 11
- Protected Employment Sites - Policy 26
- Eastbrook Development Opportunities - Policy 12
- ... Shoreham Harbour Broad Location - Policy 8
- ★ Proposed Roundabout (Indicative) - Policies 5, 7
- Site of Special Scientific Interest (SSSI) - Policy 32
- Site of Nature Conservation Importance (SNCI) - Policy 32
- Local Nature Reserve (LNR) - Policy 32
- Proposed Extension to SNCI - Policy 6
- Local Green Gap - Policy 14
- Countryside - Policy 13
- Ricardo Boundary - Policies 4, 13
- Safeguarded Wharves (as per WSCC Minerals Local Plan, 2003)
- Relocated Withy Patch site (indicative)
- Conservation Areas - Policies 17, 18
- Town Centre Boundaries - Policy 28
- Primary Shopping Area - Policy 28
- Primary Retail Frontages - Policies 9, 11, 12, 28
- Secondary Retail Frontages - Policies 9, 11, 28
- Local Shopping Parades - Policy 28
- Town Centre Blocks (Numbered) - Policies 9, 11
- ◆ Scheduled Ancient Monuments

- 12.1.2 A Sustainability Appraisal has been undertaken for these amendments (**see Appendix VII**) (other than amendment 5 which cannot be assessed at this stage as it will be unclear until the planning application stage exactly where the boundary will lie and therefore no meaningful assessment can currently be undertaken). The results of these appraisals are as follows:

12.2 The Number of Homes at New Monks Farm

Reasons for selecting the alternatives considered

- 12.2.1 The number of new homes at New Monks Farm, Lancing is a key issue to be addressed through the Local Plan. Previous versions of the Local Plan, including the Proposed Submission Adur Local Plan 2014, indicated a range of houses (450-600 homes) to provide some flexibility at the planning application stage, having particular regard to some of the landscape and ecological sensitivities on the site. However, given some of the significant infrastructure requirements such as surface water/foul water drainage and the need for a new roundabout on the A27 to serve the development, the site does have some viability/delivery issues. It was therefore considered that to provide developers with more certainty and confidence, a more fixed amount of homes (600) should be included in the policy rather than a range. This amount of housing does not exceed the top end of the range included in previous versions of the Plan but clearly provides less flexibility. Consequently, a specific appraisal of the range option (450-600 dwellings) and the more fixed option (600 dwellings) was undertaken so the potential effects of the two options could be compared.
- 12.2.2 In light of these considerations, the following alternatives were therefore identified and subjected to appraisal:
1. A range of 450-600 new dwellings at New Monks Farm
 2. 600 new dwellings at New Monks Farm

Appraisal findings

Introduction

- 12.2.3 This section presents summary appraisal findings in relation to the alternatives presented above. Detailed appraisal findings are presented in **Appendix VI**.

Summary appraisal findings

- 12.2.4 Whilst the Sustainability Appraisal recognises that Option 1 (450-600 dwellings) is likely to make a slightly more positive contribution to the environmental objectives as it provides more flexibility and allows for a minimum of 450 dwellings to be provided, the scores for the two options in relation to the environmental objectives are generally similar. Any additional impacts of Option 2 are unlikely to be major and could only be determined with any accuracy at the detailed design stage. Option 2 (600 dwellings) scores more positively against economic and some social objectives because it is less flexible in the amount of housing it provides and is likely to make any scheme slightly more viable and give developers more certainty. It should be noted that if the top end of the range for Option 1 is provided, the positive and negative impacts of this option would be identical to Option 2. Additionally, another point to note is that the Option 2 figure is still more of a guide than a completely fixed figure as housing numbers may change slightly once the detail is worked up at the planning application stage.

Outline reasons for selecting the preferred approach

Introduction

- 12.2.5 This section explains the Council's reasons for developing the preferred approach – as set out within the Proposed Submission Plan – subsequent to / in-light of the alternatives appraisal.

The Council's 'outline reasons'

- 12.2.6 It is considered that although Option 1 scores more positively with regard to the environmental objectives, the preferred approach is Option 2 to provide developer confidence and a clearer understanding of the viability of the development. This approach is more likely to ensure that development on this site is delivered. Additionally, a number of safeguards are built in to the New Monks Farm policy to ensure that the development will not have an unacceptable environmental impact.

12.3 New Roundabout Alternatives

Introduction

- 12.3.1 The need to identify a location for a new roundabout on the A27 is a key issue to be addressed through the Local Plan, and hence it is appropriate ('reasonable') that it has been the focus of alternatives appraisal.
- 12.3.2 This Chapter explains the full 'story' of alternatives consideration, from the selection of reasonable alternatives to the selection of a preferred approach in light of appraisal findings.

Reasons for selecting the alternatives considered

- 12.3.3 For new development to take place at New Monks Farm and Shoreham Airport, a new access from the A27 is required as confirmed by Highways England who have also confirmed that only one access will be acceptable. This access would take the form of a roundabout. Previously two different roundabout locations had been proposed by the promoters of New Monks Farm and the promoters of Shoreham Airport – adjacent to the proposed development area at New Monks Farm or in place of the Sussex Pad junction adjacent to the Airport - as the two parties could not agree on a single roundabout location. However, an agreement has now been reached between the two parties and the recent Regulation 18 consultation for changes to the New Monks Farm policy and allocation (December 2015) proposed this new agreed central roundabout location. Therefore, this new option has been assessed against the previous two identified options.
- 12.3.4 In light of these considerations, the following alternatives were identified and subjected to appraisal:
- 1) Shoreham Airport/Sussex Pad Roundabout (Figure 12.2 – Indicative roundabout design)
 - 2) New Monks Farm Roundabout (Figure 12.3 – Indicative roundabout design)
 - 3) Central roundabout option (Figure 12.4)

Figure 12.2: Shoreham Airport/Sussex Pad Roundabout

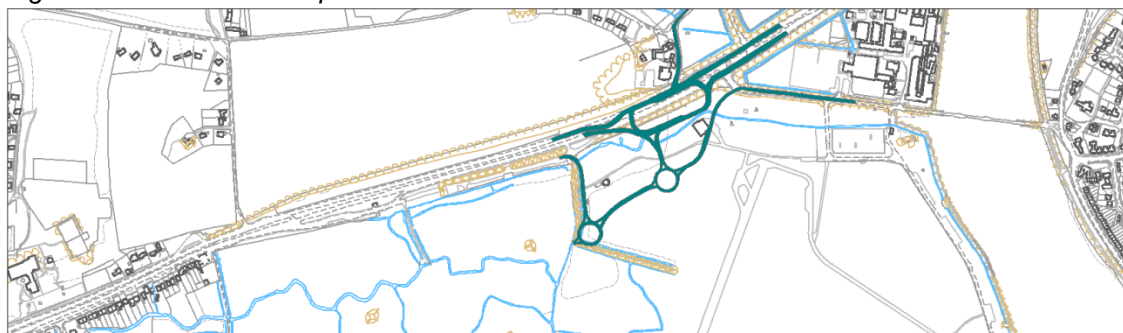


Figure 12.3: New Monks Farm Roundabout

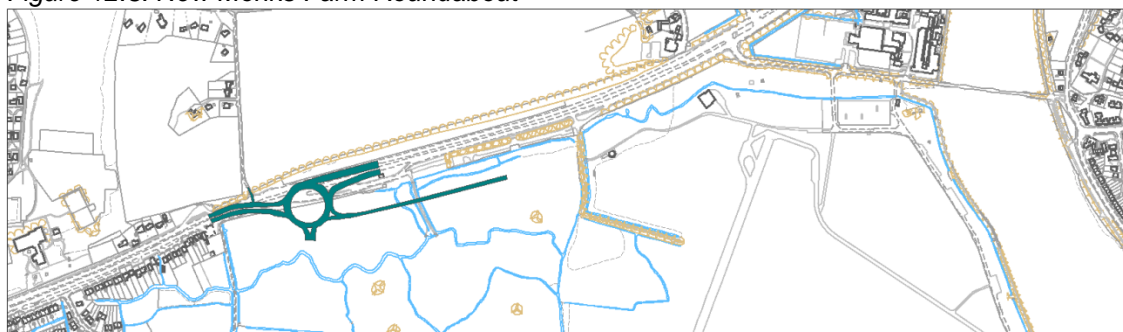
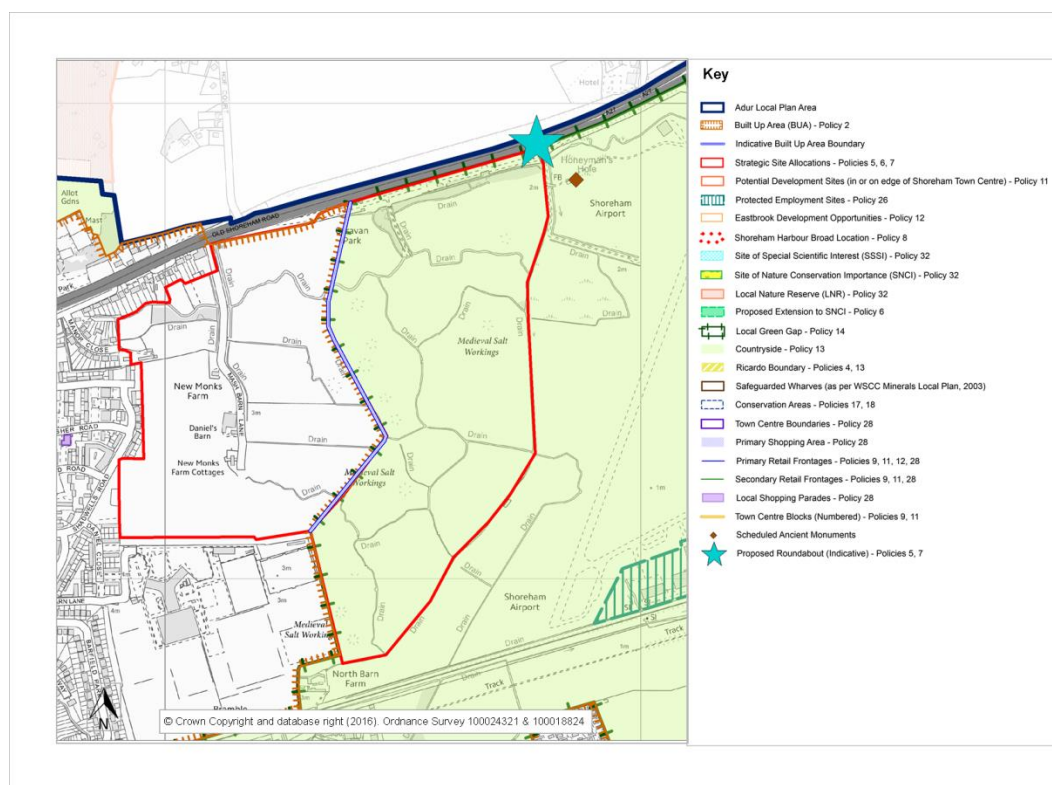


Figure 12.4 – Extract from Adur Local Plan Policies Map showing central roundabout location



Appraisal findings

Introduction

- 12.3.5 This section presents summary appraisal findings in relation to the alternatives presented above. Detailed appraisal findings are presented in **Appendix VI**.

Summary appraisal findings

- 12.3.6 The Sustainability Appraisal shows that the general benefits and disadvantages of both roundabouts are largely similar. One of the main differences at this stage is the impact on the landscape and historic environment. Shoreham Airport is the most sensitive location and, as a result, the Shoreham Airport roundabout and the central roundabout option has more scope for conflict with the countryside and heritage objectives than the New Monks Farm roundabout. However, the central roundabout location is the only option that promoters of New Monks Farm and promoters of Shoreham Airport actually agree on so this is the most deliverable option and therefore scores slightly more positively on the housing and economic objectives.

Outline reasons for selecting the preferred approach

Introduction

- 12.3.7 This section explains the Council's reasons for developing the preferred approach – as set out within the Proposed Submission Plan – subsequent to / in-light of the alternatives appraisal.

The Council's 'outline reasons'

- 12.3.8 The environmental impacts of the roundabout adjacent Shoreham Airport and the more central roundabout option are likely to be more significant than a roundabout adjacent to New Monks Farm although it is recognised that the broad zone of visual influence for all of the roundabout options is similar. Nevertheless, the preferred approach in the Local Plan is the central roundabout option as this roundabout location has been agreed by promoters of both the Airport and New Monks Farm as well as Ricardo which is located adjacent and is one of the larger employers in the district. The agreement of these parties will help improve the deliverability of the roundabout and hence the deliverability of the allocations at New Monks Farm and Shoreham Airport. This benefit of the central roundabout location is also recognised when assessed against the housing and employment objectives.

12.4 The Relocation of Withy Patch and its inclusion within the New Monks Farm site allocation boundary

Reasons for selecting the alternatives considered

- 12.4.1 In previous versions of the Local Plan, the Withy Patch gypsy and travellers site is located outside of the New Monks Farm site allocation boundary. However, due to the need to find additional traveller pitches to meet identified needs, the need to reduce flood risk on the site for existing and future residents, and in order to accommodate a central roundabout option serving New Monks Farm and Shoreham Airport, it is considered necessary to relocate the Withy Patch gypsy and travellers site westwards and within the New Monks Farm site allocation boundary. This relocation allows for the ground of the new site to be raised out of flood zone 3a (high probability) and therefore provides an opportunity for future expansion of the site to meet the needs generated by residents at the existing site. The relocation also provides an opportunity to improve the travellers site and facilities.
- 12.4.2 In light of these considerations, the following alternatives were therefore identified and subjected to appraisal:
1. The Withy Patch site remains in its existing location and outside the New Monks Farm site allocation boundary (as shown in the Proposed Submission Adur Local Plan 2014)
 2. The Withy Patch site is relocated westwards with a limited expansion to meet identified needs and is included within the New Monks Farm site boundary.

Appraisal findings

Introduction

- 12.4.3 This section presents summary appraisal findings in relation to the alternatives presented above. Detailed appraisal findings are presented in **Appendix VI**.

Summary appraisal findings

- 12.4.4 The Sustainability Appraisal shows that Option 2 (relocation of Withy Patch gypsy and travellers site) scores more positively than Option 1 (Withy Patch gypsy and travellers site not relocated) against the Sustainability Objectives. This is mainly because Option 2 provides an opportunity for some additional pitches in the future as well as an opportunity to reduce flood risk on the gypsy and travellers site. This option also allows for a new roundabout serving new development at New Monks Farm and Shoreham Airport in a central location as agreed by promoters of both sites.

Outline reasons for selecting the preferred approach

Introduction

- 12.4.5 This section explains the Council's reasons for developing the preferred approach – as set out within the Proposed Submission Plan – subsequent to / in-light of the alternatives appraisal.

The Council's 'outline reasons'

- 12.4.6 Option 2 (relocation of Withy Patch gypsy and travellers site) not only scores more positively against the Sustainability Objectives but also helps ensure delivery of development at New Monks Farm and Shoreham Airport as it allows for a central roundabout location as agreed by promoters of both sites.

13. OBJECTIVELY ASSESSED NEED FOR HOUSING

13.1 Introduction / Reasons for selecting the alternatives considered

- 13.1.1 As discussed in Chapter 9 and Chapter 10, a new Objectively Assessed Need (OAN) for Housing study was produced for Adur in 2015 which derived an OAN figure of 5,820 (291 per annum) new dwellings over the Plan period. Although a figure of 270 dwellings per annum had previously been assessed in 2011 when considering housing growth quantum option for the Plan, it was considered that the new OAN should be assessed given that a lot of work has been undertaken since 2011 to further understand the development opportunities and constraints in the district.
- 13.1.2 There are a number of ways that 5,820 new dwellings could be delivered over the plan period. This could involve significantly increased densities at New Monks Farm, West Sompting, Shoreham Harbour and other sites. However, densities at Shoreham Harbour are already quite high and in many cases, the appropriate density of a site is determined, by its location and surroundings so it isn't necessarily a 'reasonable' option to only consider high densities for every site. Although, densities for proposed development at New Monks Farm and West Sompting are not currently finalised, general capacity work has indicated a density of around 40-50 dph at New Monks Farm and approximately 35dph at West Sompting. Another option of assessing 5,820 houses was to assume densities stayed the same but that the development area increases significantly taking up a lot more land within the local green gaps (both the Sompting/Lancing – Worthing gap and the Shoreham-Lancing gap).
- 13.1.3 It was considered that the most practical approach to assessing the impacts of delivering the OAN was to consider a combination of the above – additional land-take in the gaps and an increase in density at West Sompting so both New Monks Farm and Sompting are assessed for the OAN option at a density of 40-50 dph. To achieve the OAN, this scenario would result in the New Monks Farm development area being increased from 27ha to approx. 43ha and the West Sompting allocation being increased from 27ha to approx. 47ha.
- 13.1.4 Using this approach, the OAN was then assessed and compared against the approach set out in the Proposed Submission Adur Local Plan which aims to provide 3,609 dwellings. Obviously the approach set out in the Proposed Submission Plan has been informed by the Sustainability Appraisal process throughout the Plan's production. The OAN scenario does not include sites that were ruled out subsequent to the Site Options appraisal process as set out in Appendix III.
- 13.1.5 The following options were therefore subjected to appraisal:
- 1) Provision of 3,609 dwellings as set out in the Proposed Submission Adur Local Plan (2016)
 - 2) Provision of 5,820 dwellings to meet Adur's Objectively Assessed Housing Need.

13.2 Appraisal findings

Introduction

- 13.2.1 This section presents summary appraisal findings in relation to alternatives presented above. Detailed appraisal findings are presented in **Appendix VII**.

Summary appraisal findings

- 13.2.2 Whilst Option 1 scores well with regard to a number of social and economic objectives, Option 2 scores particularly well against these objectives and would clearly have significant social and economic impacts. However, with regard to the environmental objectives, while neither option scores particularly well, Option 2 performs notably worse against these objectives as it would result in a significant increase in the amount of development within the local green gaps and areas at risk of flooding compared against Option 1. Option 1 achieves a greater balance between the differing social, environmental and economic sustainability objectives than Option 2.

13.3 Outline reasons for selecting the preferred approach

Introduction

- 13.3.1 This section explains the Council's reasons for developing the preferred approach – as set out within the Proposed Submission Plan – subsequent to / in-light of the alternatives appraisal.

The Council's 'outline reasons'

- 13.3.2 While it is recognised that Option 2 (5,820 dwellings) would have significant social and economic benefits, it would also have significant negative impacts on the environment. These include a significant reduction in the local green gaps to the point where their function is compromised, and more development in areas at risk of flooding (New Monks Farm). Option 1 (3,609 dwellings) aims to strike a greater balance between social, economic and environmental objectives and deliver housing without eroding the character of Adur and maintaining the principle and purpose of the Local Green Gaps. Option 1 has been informed by the SA process and more clearly aims to fulfil the vision and objectives set out in the Plan.

PART 3: WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

14 INTRODUCTION (TO PART 3)

The report must include...

- The likely significant effects associated with the draft plan
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects

14.1.1 The aim of Part 3 is to present appraisal findings in relation to the Proposed Submission Adur Local Plan. Part 3 is structured as follows:

- Chapter 15 discusses the methodological approach taken to appraisal
- Chapter 16 presents three appraisal 'matrices' across which the merits of each policy within the plan (of which there are 37 in total) are summarised in terms of each of the 21 SA objectives established through scoping. The matrices also include space for summarising the effects of the policies 'in combination'. Also, below the appraisal matrices is text summarising the merits of each policy individually.
 - The more detailed appraisal tables that 'sit behind' the appraisal summaries presented in this chapter can be found within the **Technical Appendices** document.
 - It is also worth noting that instances are highlighted within the appraisal of text of past 'working draft plan' appraisal iterations having had an influence on the plan as it stands currently.
- Chapter 17 discusses overall conclusions at this current stage

15 METHODOLOGY

15.1.1 The aim of the appraisal is to 'identify and evaluate the likely significant effects' of the preferred approach on the baseline, drawing on the sustainability objectives and issues identified through scoping (see Part 1) as a methodological framework.

15.1.2 A colour coding system has been used as part of this process and this is as follows:

Green	Positive impact / consistent with Sustainability Objectives
Amber	Mixed impacts / potential for conflict with Sustainability Objectives
Red	Negative impact / conflict with Sustainability Objectives
0	No impact or negligible impact/ issue addressed by other policies in Local Plan / N/A (Not applicable)

15.1.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline.²³

15.1.4 Because of the uncertainties involved there is inevitably a need to make assumptions. Assumptions are made cautiously, and explained within the text as appropriate. The aim is to strike a balance between comprehensiveness and accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

15.1.5 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.²⁴ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Adur Local Plan to impact on 'receptors' in combination with other planned activity (e.g. activity that will occur as a result of plans prepared by neighbouring authorities). These effect components/characteristics are described within the appraisal as appropriate.

²³ The implication being that it is difficult, if not impossible, to identify a 'cause-effect relationship' with any certainty.

²⁴ Environmental Assessment of Plans and Programmes Regulations 2004

16 APPRAISAL FINDINGS

16.1 Introduction

This Chapter presents summary appraisal findings in relation to the Adur Local Plan (Proposed Submission Version). It should be noted that this appraisal takes account of the revisions to the Plan outlined in the Amendments to the Proposed Submission Adur Local Plan (2016) document. Rather than just assessing the specific amendments to the Plan, the whole Plan has been reappraised taking into account the amendments. Detailed appraisal findings are presented within the **Technical Appendices** document that accompanies this SA Report.

16.1.1 Presented below is –

- 1) A series of ‘matrices’ across which the merits of each policy within the plan (of which there are 37 in total) are summarised in terms of each of the 21 SA objectives established through scoping. The matrices also include space for summarising the effects of the policies ‘in combination’,
- 2) Appraisal text summarising the merits of each policy individually.

16.1.2 The plan document is structured under a number of headings, and this structure is also used below. The headings are as follows:

- A Strategy for Change and Prosperity
- Policies for Places
- Development Management Policies

16.1.3 It is also worth noting that instances are highlighted within the appraisal of text of past ‘working draft plan’ appraisal iterations having had an influence on the plan as it stands currently.

16.2 Appraisal findings for Part 2 of the Plan ('A Strategy for Change and Prosperity')

16.2.1 This part of the plan focuses on the spatial strategy and presents allocations for new housing and employment sites in the district. The table below presents summary appraisal findings for each of the policies that comprise this part of the plan, and also considers how policies would impact 'in combination'. The subsequent section then considers each policy in turn in greater detail.

Summary appraisal findings (overview and policies in combination)

SA Objective	Policy							Impact of policies in combination
	2	3	4	5	6	7	8	
1 Energy							G	This objective is primarily addressed by other parts of the Plan.
2 Water	A	A	A			A	A	There is potential for Part 2 of the Plan to impact on water quality if such impacts are not mitigated adequately.
3 Land Efficiency	G	G	G	G	G	G	G	Positive impacts as greenfield development is only proposed due to there being inadequate brownfield sites in the district to meet development needs.
4 Biodiversity	A	A	A	A	A	A	A	There is potential for Part 2 of the Plan to impact on biodiversity if such impacts are not adequately mitigated.
5 Historic Environment	A	A	A	A	A	A	G	The impacts on this objective are mixed but there is potential for Part 2 of the Plan to impact on the historic environment if such impacts are not adequately mitigated.
6 Countryside	A	A	A	A	A	A	G	The impacts on this objective are mixed but there is potential for Part 2 of the Plan to impact on the countryside if such impacts are not adequately mitigated.
7 Green Infrastructure		A		G	G	A	G	The impacts on this objective are mixed although the Plan provides significant opportunities for green infrastructure.
8 Pollution	A	A	A	A	A	A	A	The impacts on this objective are mixed but there is potential for Part 2 of the Plan to worsen pollution in the district if such impacts are not adequately mitigated.
9 Climate Change				G	G	G	G	Policies in Part 2 of the plan aim to ensure that new development takes into account the changing climate and is adaptable and robust to extreme weather events. .
10 Health		A		G	G		G	The impacts on this objective are generally positive due to the significant levels of open space that would be provided as part of some of the allocations.
11 Crime								This objective is addressed in other parts of the Plan.

SA Objective	Policy							Impact of policies in combination
	2	3	4	5	6	7	8	
12 Transport	A	A		A	A	A	A	There is a risk that car movements in the district could increase as a result of the Plan if sustainable transport measures are not adequately implemented.
13 Social Exclusion	G	G	G	G		G	G	Positive impacts.
14 Housing	G	G		G	G		G	Positive impacts.
15 Vibrant Communities		G	G	G	G		G	Positive impacts.
16 Economic Development	G	G	G	G	G	G	G	Positive impacts.
17 Flooding	A	A	A	A	G	A	A	The impacts on this objective are mixed but there is potential for Part 2 of the Plan to worsen flood risk in the district if such potential impacts are not adequately mitigated.
18 Services	G	G	G	G	G	G	G	Positive impacts.
19 Places						A	G	Some mixed impacts but this objective is generally addressed by other sections of the Plan.
20 Education				G				This objective is primarily addressed by other policies within the Plan.
21 Waste								This objective is addressed in other parts of the Plan.

Summary appraisal findings in relation to each individual policy

Policy 2: Spatial Strategy

- 16.2.2 This policy seeks to focus development in the built up areas of Lancing, Sompting, Shoreham-By-Sea, Southwick and Fishersgate but recognises the need for some greenfield sites to meet development needs. Regeneration will be delivered through new development at Shoreham Harbour, Shoreham Airport and New Monks Farm. The policy aims to protect the Local Green Gaps and prevent coalescence of settlements as well as protecting the character of Sompting Village.
- 16.2.3 On balance, this policy scores **Amber** as it would have a number of sustainability benefits, the majority of which are social and economic but there are also some environmental benefits. The policy is likely to have some negative impacts in relation to protecting the countryside and flood risk but it is considered that these impacts would not be unacceptable.

Policy 3: Housing Provision

- 16.2.4 This policy sets out the amount of housing to be delivered over the Plan period and the location of this housing. On balance, this policy scores **Amber**. The policy would have a significant number of long-term permanent social and economic benefits but scores less favourably regarding some of the environmental objectives. Specifically there is potential for conflict with Objective 2 (Water Quality), Objective 4 (Biodiversity), Objective 5 (Historic Environment), Objective 6 (Countryside), Objective 7 (Green Infrastructure), Objective 8 (Pollution), Objective 9 (Health and Wellbeing), Objective 12 (Sustainable Transport) and Objective 17 (Flood Risk). Nevertheless, it is considered that any potential negative impacts in relation to these objectives could be mitigated and other policies within the Plan aim to do this.

Policy 4: Planning for Economic Growth

- 16.2.5 This policy allocates a total of up to 41,000sqm of employment generating floorspace within Adur at Shoreham Airport (approximately 15,000sqm), Shoreham Harbour (up to 16,000sqm) and New Monks Farm (up to 10,000sqm). It also sets out criteria for the provision of new employment floorspace outside of these allocated areas.
- 16.2.6 On balance, this policy scores **Amber**. This policy would have a number of long-term, permanent social and economic benefits. However, there is potential for conflict with a number of environmental objectives including Objective 2 (water quality), Objective 4 (biodiversity), Objective 5 (historic environment), Objective 6 (countryside), and Objective 8 (pollution). Nevertheless, it is considered that any potential impacts can be mitigated.

Policy 5: New Monks Farm, Lancing

- 16.2.7 This policy allocates New Monks Farm for the provision of between 450-600 homes, 10,000sqm of employment generating floorspace, provision of land for a new school as well as associated infrastructure and green infrastructure/open space improvements including a new country park.
- 16.2.8 On balance, this policy scores **Amber** as it would have a number of long-term positive social and economic benefits but there is some potential for conflict with a number of environmental objectives including Objective 4 (biodiversity), Objective 5 (historic environment), Objective 6 (countryside), Objective 8 (pollution) and Objective 17 (flood risk). The policy aims to minimise/mitigate these impacts as much as possible but these issues would need to be addressed carefully at the planning application stage.

Policy 6: West Sompting (Sompting Fringe and Sompting North)

- 16.2.9 This policy allocates West Sompting for the provision of 480 homes as well as associated infrastructure and green infrastructure/open space improvements.

- 16.2.10 On balance, this policy scores **Amber**. The policy would have a number of long-term positive social and economic benefits as well as some environmental benefits, but there is some potential for conflict with a number of objectives including Objective 5 (historic environment), Objective 6 (countryside), Objective 8 (pollution) and Objective 12 (sustainable transport). The policy aims to minimise/mitigate these impacts as much as possible but these issues would need to be carefully addressed at the planning application stage.

Policy 7: Shoreham Airport

- 16.2.11 This policy allocates Shoreham Airport for the provision of approximately 15,000 sqm of new employment floorspace. The policy also requires sustainable transport initiatives, flood risk mitigation, development to be designed to reflect the open nature of the Local Green Gap between Shoreham and Lancing, the retention of key views and development that respects the historic character of the airport and its key buildings. It also seeks to protect existing aviation related employment at the airport.
- 16.2.12 On balance, this policy scores **Amber** as it would have a number of long-term social and economic benefits but there is potential for negative impacts on the environmental objectives including water quality, biodiversity, the countryside, historic environment, green infrastructure, pollution, and minimising flood risk. The policy aims to minimise/mitigate these impacts as much as possible but these issues would need to be carefully addressed at the planning application stage.

Policy 8: Shoreham Harbour Regeneration Area

- 16.2.13 This policy addresses 5 of the seven character areas identified at Shoreham Harbour. The two character areas that are not addressed are within Brighton & Hove and will be addressed through the emerging Brighton & Hove Local Plan. The policy identifies key priorities for each character area including, amongst other things, supporting Shoreham Port in improving operational efficiencies, environmental improvements, improved access to the waterfront and mixed use development in the western arm of the Harbour.
- 16.2.14 On balance, this policy scores **Amber** as it would have a number of long-term social, economic and environmental benefits but there is potential for negative impacts on some of the environmental objectives including water quality, biodiversity, the countryside, historic environment, green infrastructure, pollution, and minimising flood risk. The policy aims to minimise/mitigate these impacts as far as possible but these issues would need to be carefully addressed at the planning application stage.
- 16.2.15 N.B. At an earlier stage in the plan-making / SA process it was recommended that the policy should contain information regarding improved north/south links from/to the Harbour as well as more information on mitigation of impacts on the River Adur SSSI. This recommendation has since been taken on-board, and reflected in a change made to the plan.

16.3 Appraisal findings for Part 3 of the Plan ('Policies for Places')

- 16.3.1 This part of the plan contains specific place-based policies for Lancing, Sompting, Shoreham-By-Sea, and Southwick and Fishergate. The table below presents summary appraisal findings for each of the policies that comprise this part of the plan, and also considers how policies would impact 'in combination'. The subsequent section then considers each policy in turn in greater detail.

Summary appraisal findings (overview and policies in combination)

SA Objective	Policy						Impact of policies in combination
	9	10	11	12	13	14	
1 Energy							No impact as this objective is dealt with in other sections of the plan.
2 Water							No impact as this objective is dealt with in other sections of the plan.
3 Land Efficiency			G		G	G	Some positive impacts on land efficiency.
4 Biodiversity			G		G	G	Some positive impacts on biodiversity.
5 Historic Environment		G	G		G	G	Positive overall.
6 Countryside		G			G	G	Some positive impacts on the countryside.
7 Green Infrastructure	G		G		G	G	Positive overall.
8 Pollution			G		G	G	Some positive impacts on pollution.
9 Climate Change					G		The one policy that impacts on this objective is positive.
10 Health	G		G		G	G	Positive overall.
11 Crime	G		G	G			Positive overall.
12 Transport	G		G		G	G	Positive overall.
13 Social Exclusion							No impact as this objective is dealt with in other sections of the plan.
14 Housing		R	G		R	R	There are both positive and negative impacts on this objective.
15 Vibrant Communities	G		G	G		G	Positive overall.
16 Economic Development	G		G	G	A	A	Generally positive overall.
17 Flooding		R	R		G	G	Both policies 10 (Sompting) and 11 (Shoreham-By-Sea) would have a negative impact on this objective.
18 Services	G		G	G			Positive overall
19 Places	G						The one policy that impacts on this objective is positive.
20 Education							No impact as this objective is dealt with in other sections of the plan.
21 Waste							No impact as this objective is dealt with in other sections of the plan.

Summary appraisal findings in relation to each individual policy

Policy 9: Lancing

- 16.3.2 This policy primarily focuses on appropriate uses in Lancing village centre but also states that Lancing Business Park will be protected for business use.
- 16.3.3 This policy scores **Green** as it is relatively cross-cutting and would have a number of environmental, social and economic benefits.

Policy 10 – Sompting

- 16.3.4 This policy states that Sompting village will not be expanded, due to its historic character and countryside location within the Local Green Gap, and that improvements to West Street and/or the A27 will be sought to reduce through traffic in West Street.
- 16.3.5 On balance, this policy scores **Amber**. The main benefits of this policy relate to protecting the countryside and the Sompting Village Conservation Area. However, in restricting development at Sompting Village, it would prevent opportunities to provide new housing in areas with a low risk of flooding.

Policy 11: Shoreham-by-Sea

- 16.3.6 This policy states that in addition to Shoreham Harbour, the town centre will be the main focus for new development in Shoreham-by-Sea. Three sites within the town centre are specifically identified for a mix of uses: Pond Road, Ropetackle North and Adur Civic Centre. Amongst other things, the policy focuses on appropriate town centre uses as well as traffic management measures, environmental improvements, improvements to open space and cycle ways and footpaths. It seeks to ensure that the historic town centre and its setting are respected and the setting of the River Adur protected. The policy also seeks to protect Dolphin Road Business Park for business use.
- 16.3.7 On balance, this policy scores **Amber**. This policy would have a number of environmental, social and economic benefits. However, by ensuring that Shoreham town centre is the focus for new development, the policy is likely to result in more development in areas at risk of flooding.

Policy 12: Southwick and Fishersgate

- 16.3.8 This policy primarily sets out appropriate uses within Southwick town centre, but it also supports environmental enhancements at Southwick Square as well as traffic management measures to address HGVs and other traffic associated with new development at Shoreham Harbour.
- 16.3.9 This policy scores **Green** as it is relatively limited in its scope but would have a number of environmental, social and economic *benefits*.

Policy 13: Adur's Countryside and Coast

- 16.3.10 This policy restricts development within the countryside (land outside the defined Built Up Area, including some coastline) and only allows development where a countryside location is essential. It supports improvements to green infrastructure, including enhanced pedestrian and cycle links and better access for those with mobility difficulties. The policy, amongst other things, seeks to , protect and enhance the landscape character of the District, and respect the setting of the South Downs National Park. It also sets out the approach to any future development at the Ricardo site.

- 16.3.11 On balance, this policy scores **Amber** as it has a significant number of environmental benefits but scores negatively in relation to housing provision.

Policy 14: Local Green Gaps

- 16.3.12 This policy seeks to protect the Local Green Gaps between the settlements of Lancing/Sompting – Worthing and Lancing – Shoreham-By-Sea in order to retain the separate identities and character of these settlements.
- 16.3.13 On balance, this policy scores **Amber** as it has a significant number of environmental benefits but scores negatively in relation to housing provision.

16.4 Appraisal findings for Part 4 of the Plan ('Development Management Policies')

- 16.4.1 The development management policies will be applied when determining planning applications at all sites, unless site specific policy is in place that takes precedent. The table below presents summary appraisal findings for each of the policies that comprise this part of the plan, and also considers how policies would impact 'in combination'. The subsequent section then considers each policy in turn in greater detail.

Summary appraisal findings (policies in combination)

SA Objective	Policy																								Impact of policies in combination
	15	16 & 17	18 Policy has now been deleted.	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38		
1. Energy	G	A		G	G																				Generally positive overall. Development of the historic fabric likely to be limited so any negative impact of Policies 16&17 (Historic Environment) should be minimal.
2. Water	G			G												G				G	G	G			Positive overall.
3. Land Efficiency		G		G				G			A													G	Generally positive overall but some potential for conflict arising from Policy 26 (Employment).
4. Biodiversity	G			G												G	G	G		G	G	G	G		Positive overall.
5. Historic Environment	G	G		A				G				G				G		G		G				G	Generally positive overall. Any potential for negative impacts will depend on the amount and nature of development taking place within the historic fabric.

SA Objective	Policy																												Impact of policies in combination
	15	16 & 17	18 Policy has now been deleted.	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38						
6. Countryside	G	G							G			G				G	G	G		G	G	G	G						Positive overall.
7. Green Infrastructure	G	G										G		G		G	G	G	G	G	G	G	G						Positive overall.
8. Pollution	G			G	G				G					G		G	G		G	G	G	G							Positive overall.
9. Climate Change	G	A		G	G											G				G			G						Generally positive overall. There is potential for conflict with policies 16 & 17 (Historic Environment) but this would be minimal.
10. Health	G					G	G		G			G		G	G	G	G	G	G	G	G	G							Positive overall.
11. Crime	G														G			G	G										Positive overall.
12. Transport								G	G		G	G		G													G		Positive overall.
13. Social Exclusion	G					G	G		G		G	G		G	G				G								G		Positive overall

SA Objective	Policy																										Impact of policies in combination
	15	16 & 17	18 Policy has now been deleted.	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38				
14. Housing	G					G	G	G	G	G										G	G				Positive overall.		
15. Vibrant Communities	G					G	G		G	G	G	G	G	G				G	G						Positive overall.		
16. Economic Development				G							G	G	G	G	G	G				G	G	G	G		Positive overall.		
17. Flooding	G	A							G						G	G				G		G			Generally positive overall. There is potential for conflict with policies 16 & 17 (Historic Environment) but this would be minimal.		
18. Services	G	G				G		G			G	G	G	G	G			G	G			G	A		Generally positive overall. Other policies and measures should help to counteract any negative impacts from expansion of telecommunications on existing centres.		
19. Places	G	G		G		G		G					G		G	G	G	G		G		G			Generally positive overall. Safeguards in Policy 23 (Density) and other policies should limit negative impact of new development on existing		

SA Objective	Policy																								Impact of policies in combination
	15	16 & 17	18 Policy has now been deleted.	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38		
																									areas.
20. Education																									The one policy that impacts on this objective is positive.
21. Waste																									The one policy that impacts on this objective is positive.

Summary appraisal findings in relation to each individual policy

Policy 15: Quality of the Built Environment and Public Realm

- 16.4.2 This policy scores **Green** as it is cross cutting and would have a significant number of sustainability benefits, particularly in relation to the historic environment, the countryside, crime reduction and general design and appearance.

Policies 16 & 17: The Historic Environment

- 16.4.3 On balance, this policy scores **Amber**. These policies are relatively specific but would have a number of benefits relating to the historic environment, the countryside, the vitality and viability of Shoreham town centre and the appearance of the district. There is scope for conflict with a range of objectives concerned with sustainable construction, for example energy efficiency. The actual scale of this conflict will depend on how much development comes forward within the historic fabric and the scope for incorporating new materials / features without causing harm to it. This is likely to change over time as new materials and techniques emerge.

Policy 18: The Energy Hierarchy

- 16.4.4 This policy has now been deleted for reasons set out in the Technical Appendix.

Policy 19: Sustainable Design

- 16.4.5 On balance, this policy scores **Amber**. This policy strongly supports the objectives concerned with sustainability. There may be some conflict in relation to the historic environment although this may be less of an issue later in the plan period as new materials and technologies emerge.

Policy 20: Decentralised Energy and Standalone Energy Schemes

- 16.4.6 This policy scores **Green**. This policy is very specific and would have the effect of promoting objective 1 regarding increasing energy efficiency and encouraging the use of renewable energy sources together with ancillary issues in the long term in respect of pollution and climate change.

Policy 21: Housing Mix and Quality

- 16.4.7 This policy scores **Green**. By seeking to meet the identified housing needs of the whole community, this policy should strongly contribute to the achievement of a number of the objectives, most particularly those concerned with social inclusion.

Policy 22: Affordable Housing

- 16.4.8 This policy scores **Green**. This policy should ensure that an element of housing is provided for households on lower incomes and that a proportion of it is integrated with general market housing. This will contribute strongly to the achievement of several objectives concerned with social inclusion and integration.

Policy 23: Density

- 16.4.9 This policy scores **Green**. Subject to the location of sites that come forward for residential development, this policy has the potential to promote the efficient use of previously developed land and so help achieve the overall housing target and avoid the need for development in the countryside.

Policy 24: Provision for Gypsies and Travellers and Travelling Showpeople

- 16.4.10 This policy scores **Green**. This policy would support a number of social objectives.

Policy 25: Safeguarding Existing Gypsy and Traveller Sites

- 16.4.11 This policy scores **Green**. This policy would promote a number of social objectives.

Policy 26: Protecting and Enhancing Existing Employment Sites and Premises

- 16.4.12 This policy scores **Amber**. This policy should make a positive contribution to objectives concerned with economic issues and may also result in reduced need for commuting. There is potential for a negative effect on the re-use of land and buildings.

Policy 27: The Visitor Economy

- 16.4.13 This policy scores **Green**. The policy should enable economic diversity and growth whilst protecting and enhancing the area's environmental assets and access to them for the benefit both of visitors and residents.

Policy 28: Retail, Town Centres and Local Parades

- 16.4.14 This policy scores **Green**. This policy is relatively specific but in addition to contributing to the objective of improving the range, quality and accessibility of key services and ensuring the vitality and viability of existing centres, it would also support the economy, help ensure vibrant communities and improve the general appearance of the town centres.

Policy 29: Transport and Accessibility

- 16.4.15 This policy scores **Green**. As a central policy impacting on most forms of development, this policy has the potential to make a significant contribution to the achievement of a wide range of objectives. This includes not only the promotion of sustainable transport but economic development, health and wellbeing and social inclusion.

Policy 30: Delivering Infrastructure

- 16.4.16 This policy scores **Green**. This policy establishes a framework for the provision of facilities that could contribute significantly to a number of sustainability objectives.

Policy 31: Green Infrastructure

- 16.4.17 This policy scores **Green**. This policy has the potential to contribute significantly to a wide range of environmental and health/wellbeing objectives. How effective it is, however, will be dependent on development opportunities and/or funding coming forward.

Policy 32: Biodiversity

- 16.4.18 This policy scores **Green**. This policy would contribute to a range of environmental and health/wellbeing objectives.

Policy 33: Open Space, Recreation and Leisure

- 16.4.19 This policy scores **Green**. This policy has the potential to contribute to a range of recreational, environmental and social objectives.

Policy 34: Planning for Healthy Communities

- 16.4.20 This policy scores **Green**. This policy has a number of social and environmental benefits.

Policy 35: Pollution and Contamination

- 16.4.21 This policy scores **Green**. This policy would potentially contribute significantly to a range of objectives, both at the local and wider level.

Policy 36: Water Quality and Protection

- 16.4.22 This policy scores **Green**. This policy would potentially contribute significantly to a range of objectives.

Policy 37: Flood Risk and Sustainable Drainage

- 16.4.23 This policy scores **Green**. This policy has the potential to contribute significantly to a range of predominantly (but not exclusively) environmental objectives both at the local and wider level.

Policy 38: Telecommunications

- 16.4.24 On balance, this policy scores **Amber**. This policy, by following national guidelines, supports telecommunications development. This is essential for sustainable economic growth and should also help to reduce the need to travel and social exclusion. Within this framework the policy seeks to minimise environmental impact. Some adverse impact on the vitality and viability of existing centres may result from the national approach reflected in the policy.

17 CONCLUSIONS AND RECOMMENDATIONS AT THIS CURRENT STAGE

17.1 Conclusions at this current stage

17.1.1 The Proposed Submission Local Plan generally performs positively in relation to the Sustainability Objectives. Looking at the individual parts of the Plan, Part 2 performs particularly well with regard to social and economic issues. However, there is still significant potential for conflict with a number of environmental objectives. This is because Part 2 of the Plan identifies the key housing and employment allocations, some of which are on greenfield land within the countryside and within areas at risk of flooding. In relation to flood risk, a Sequential Test and Exception Test has been undertaken for the sites included in the Plan so every effort has been made to ensure that flood risk is avoided and minimised.

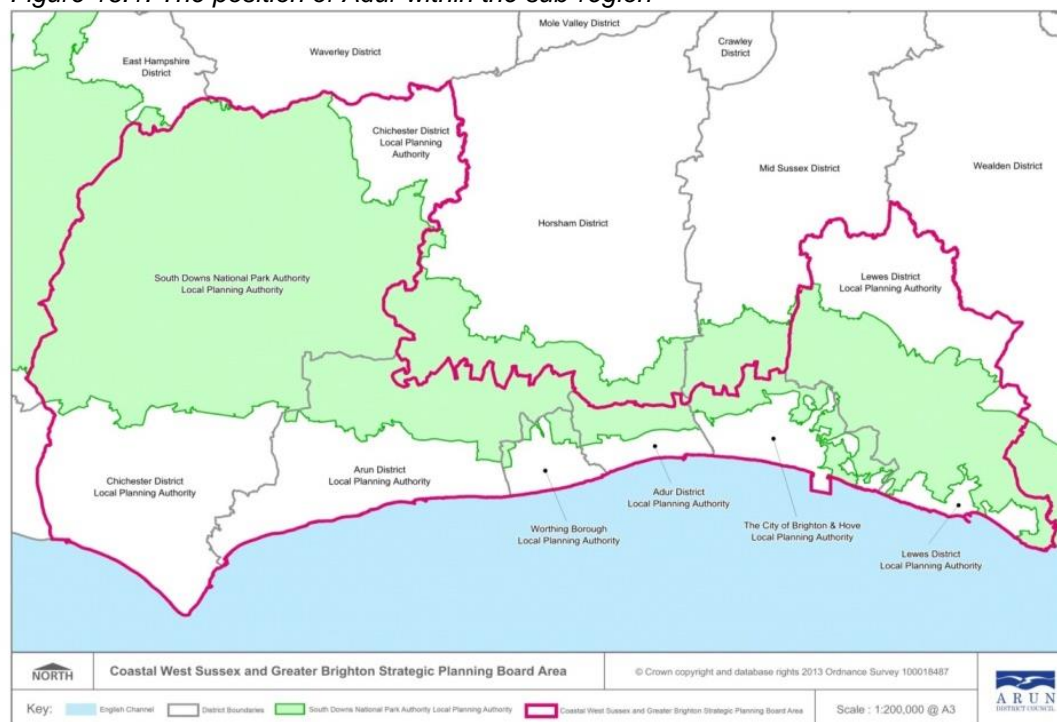
17.1.2 Other than some relatively minor incompatibilities, Parts 3 and 4 of the Revised Draft Plan score positively in relation to the Sustainability Objectives. These policies should be effective in terms of ensuring that any negative effects associated with development (e.g. impacts on the countryside and impacts around flood risk, as mentioned above) are mitigated and minimised.

17.2 Cumulative effects

17.2.1 Cumulative effects – i.e. the effects associated with the Plan being implemented alongside other planned activities outside of the control of Adur Council – are an important consideration, and hence it is worthwhile giving stand-alone consideration to cumulative effects here. First and foremost, it is worthwhile ‘thinking sub-regionally’ about what the impacts will be as a result of the Adur Local Plan being brought forward alongside other Local Plans.

17.2.2 Figure 16.1 shows two important sub-regional entities – the South Downs National Park, and the Coastal West Sussex and Greater Brighton Strategic Planning Board Area. There is a need to give consideration to impacts of the Adur Local Plan on the achievement of sustainability objectives at both these scales.

Figure 16.1: The position of Adur within the sub-region



- 17.2.3 In terms of the South Downs National Park, the Local Plan respects and supports the National Park's objectives. The preferred spatial strategy recognises the importance of local gaps in ensuring the setting of the National Park – i.e. there is a need to avoid a situation where the National Park is bounded by ribbon development. Various thematic policies within the plan set out to ensure that planning applications will implement masterplanning and design elements with a view to minimising landscape intrusion.
- 17.2.4 With respect to the Coastal West Sussex and Greater Brighton Strategic Planning Board Area, the Adur Local Plan sets out to meet objectively assessed housing needs and deliver employment land to meet demand in so far as is possible given constraints. In this way, the Adur Local Plan will contribute to economic growth and regeneration within the sub-region. Other ways in which the Local Plan contributes to the achievement of economic objectives is through the support for regeneration at Shoreham Harbour and also support for additional employment floorspace at Shoreham Airport. The latter is in-line with the objectives of the 'Greater Brighton City Deal' but it is recognised that there will be landscape impacts, including impacts to views from South Downs).
- 17.3 Recommendations at this current stage**
- 17.3.1 Numerous recommendations have been made within earlier iterations of the draft plan appraisal – i.e. appraisals undertaken in relation to earlier working drafts of the plan – and no recommendations remain outstanding at the current time.

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

18 INTRODUCTION (TO PART 4)

The SA Report must include...

- A description of the measures envisaged concerning monitoring

18.1.1 This Part of the SA Report explains the next steps that will be taken as part of the plan-making / SA process, including in relation to monitoring.

19 PLAN FINALISATION

19.1.1 A Government appointed planning Inspector will consider the submitted Plan alongside the SA Report and representations received through the consultation on the proposed submission version. The Inspector will then oversee an 'Examination in Public' where those who made representations through the consultation will have an opportunity to influence the Plan.

19.1.2 After having heard representations the Inspector will either report back on the Plan's soundness or identify modifications that are necessary in order for the Plan to be sound. If the Inspector identifies the need for modifications to the Plan these will be prepared and then subjected to consultation. An SA Report Addendum may be published for consultation alongside.

19.1.3 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' will be published that sets out (amongst other things) *'the measures decided concerning monitoring'*.

20 MONITORING

20.1.1 At the current stage – i.e. in the SA Report - there is a need to present *'a description of the measures envisaged concerning monitoring'* only.

20.1.2 The submission Plan document includes a monitoring framework that is set to be used to assess the performance of the Local Plan over its course up to 2031. It will provide the key mechanism for ensuring that Council's vision and the spatial objectives and policies stemming from it are successfully delivered. The Council will publish regular monitoring reports to identify progress with the Local Plan.

20.1.3 The following list presents proposed monitoring indicators that are particularly important from a 'sustainability perspective' (given the appraisal findings presented in this report).

- Number and percentage of new non-residential developments meeting or exceeding BREEAM Very Good standard
- Number and type of renewable energy developments / installations within the Plan area
- Number of new major developments incorporating renewable/low carbon energy production equipment to provide at least 10% of predicted energy requirements
- Status of waterbodies to be monitored annually
- Development commencements within designated sites and habitats in Adur per annum
- Extent and condition of SSSIs in Adur
- Numbers of Listed Buildings/Scheduled Ancient Monuments/ Conservation Areas at risk of decay
- Number of demolitions of listed buildings and Scheduled Ancient Monuments
- Amount of open space in Adur per 1000 population
- Number of Air Quality Management Areas (AQMAs) in Adur

- NO2 levels within monitored areas in the district
- Number of completed developments completions that incorporate remediation of contaminated land
- Number and percentage of relevant completed developments incorporating Sustainable Drainage Systems (SuDS)
- Number of implemented cycle route projects or cycle facilities
- Number of electric car charging bays provided per annum
- Index of multiple deprivation rankings
- Average gross weekly earnings
- Number of dwellings completed annually in Adur
- Number of affordable housing units completed per annum by type and as percentage of all homes built.
- Number of new social and community facilities (net) completed per annum
- Total amount and type of employment floorspace per annum
- Amount of floorspace provided for 'town centre uses' provided within Adur's town centres
- Changes of use (completions) in local parades per annum
- Number of design awards won for buildings/places in Adur

APPENDIX I: REGULATORY REQUIREMENTS

Annex I of the SEA Directive prescribes the information that must be contained in the SA Report; however, interpretation of Annex I is not straightforward. The table below 'interprets' Annex I requirements.

Annex 1

The report must include...

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
(c) the environmental characteristics of areas likely to be significantly affected;
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
(i) a description of the measures envisaged concerning monitoring.

Interpretation of Annex I

The report must include...

An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>	i.e. answer - <i>What's the scope of the SA?</i>
Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	
The relevant environmental protection objectives, established at international or national level		
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'		
The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What's the 'baseline'?</i>	
Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		i.e. answer - <i>What are the key issues & objectives?</i>
Key environmental problems / issues and objectives that should be a focus of appraisal		
An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i>	
The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
The likely significant effects associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i>	
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i>	

APPENDIX II: BROAD STRATEGY ALTERNATIVES APPRAISAL (2011)

Introduction

Chapter 10 (within Part 2) of this report explains how the process of identifying 'reasonable' spatial strategy alternatives was informed by earlier (2011) appraisal of alternatives for 'housing' and 'employment' growth. This Appendix presents summary appraisal findings in relation to the alternatives, whilst detailed appraisal findings can be found within the Interim SA Report published alongside the plan consultation document in 2011.

Summary appraisal findings: Housing growth alternatives (2011)

- Option 1 (65 homes per year) generally scores quite positively with regard to the environmental objectives, but would have significant negative impacts in terms of the social and economic objectives for the district.
 - This option scores particularly negatively in terms of objectives to: Reduce poverty, social exclusion and social inequalities; Meet housing need and ensure all groups have access to decent and appropriate housing; Create and sustain vibrant communities; Promote sustainable economic development with supporting infrastructure and ensure high stable levels of employment and a diverse economy; and Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres.
- Option 2 (105 homes per year) is relatively 'neutral' in that it would have no significant positive or negative impacts on the environmental, social or economic objectives of the SA.
- Option 3 (155 homes per year) has notably more positive impacts than options 1 and 2 although these impacts mainly relate to economic and social objectives. There are some neutral and negative impacts on the environment but most of the negative impacts are not significant.
- Option 4 (270 homes per year) has the greatest number of positive impacts out of all the options but these impacts relate to economic and social objectives. This option also has the greatest number of negative impacts in relation to the environmental objectives.
 - This option scores particularly positively in terms of objectives to: Meet housing need and ensure all groups have access to decent and appropriate housing; Create sustain vibrant communities; Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres; and Increase energy efficiency and encourage the use of renewable sources
 - This option scores particularly negatively in terms of objectives to: Protect and enhance the countryside; Conserve, protect and enhance biodiversity and habitats; Protect and enhance public open space, green infrastructure and accessibility to it; Reduce pollution and risk of pollution to air, land and water; Avoid, reduce and manage flood risk from all sources of flooding to and from the development; and Reduce amount of domestic and commercial waste going to landfill in line with the waste management hierarchy.

Summary appraisal findings: Employment growth alternatives (2011)

N.B. As explained in Chapter 10, the appraisal findings in relation to employment growth options do not remain entirely relevant at the current time as it is the case that subsequent technical work (around demand on the one hand, and capacity on the other) directly leads to the identification of a preferred approach (i.e. there is no policy choice to be made through the plan). However, summary appraisal findings are presented here nonetheless, for completeness.

- The 'Baseline scenario' option assumed that there would be no significant intervention or change in the economy of Adur over the plan period i.e. no new employment sites would be allocated. The employment forecasts for this scenario were based on the existing relatively constrained economy of Adur and show that no significant amount of new floorspace would need to be provided in the district as the predicted growth in jobs up to 2028 could mainly be met by bringing existing vacant floorspace back into use and developing currently unimplemented planning permissions.

- In sustainability terms, this option scores quite positively with regard to most of the environmental objectives, but generally scores negatively in relation to the social and economic objectives.
- The 'Economic Intervention Scenario' option was based on an assumption that significant steps are taken to improve and change the nature of the economy in Adur to provide more high skilled and high quality employment. Such a scenario would require the allocation of new employment sites in the district and the employment forecasts show that this would be likely to result in a considerable growth in Adur's economy over the plan period.
 - In sustainability terms, this option scores more positively than Option A with regard to the economic and social objectives. This option scores particularly positively in relation to Objective 16 - *Promote sustainable economic development with supporting infrastructure and ensure high and stable levels of employment and a diverse economy*. There are some negative impacts in relation to the environmental objectives; however, these are not viewed to be significant in principle.

APPENDIX III: SITE OPTIONS APPRAISAL

As discussed in Section 10.2 above, a number of site options were subjected to appraisal in order to inform selection of spatial strategy alternatives. This appendix presents full appraisal findings in relation to each site option.

Each site option as appraised in terms of a number of bespoke criteria, with performance categorised using the following 'RAG' scale -

Green (G)	Positive impact / No significant issues
Amber (A)	Some impact or potential for impact
Red (R)	Significant impact or conflict

The majority of the appraisal criteria are self-explanatory but there are a few which need further explanation (set out below).

Accessibility to green space and outdoor facilities:

The recommended accessibility standards set out in the Adur and Worthing Open Space Study have been used to assess the site. Where the site is within the distance recommended in the study it has obtained a green score and where it has exceeded the recommended distance it has obtained an amber score.

Sustainable transport:

There is very little information regarding recommended distances to public transport. Therefore the following judgements have been made:

- Train stations: If a site is within 1km of a train station it has obtained a green score and if it is further than 1km it has obtained an amber score.
- Cycle route: If a site is within 1km of a cycle route it has obtained a green score and if it is further than 1km it has obtained an amber score.
- Bus stops: There are significantly more bus stops than train stations so if the site is within 400m of a bus stop (within 5mins walking time) it has obtained a green score and if it is further than 400m it has obtained an amber score.

Sustainable economic development:

With regard to distances to the nearest business/employment areas, a judgement has been taken where a site is within 1km of an employment area it has obtained a green score and if a site is over 1km from an employment area it has obtained an amber score.

Accessibility:

There is very little information regarding recommended distances to key services. Therefore the following judgements have been taken:

- Town centres: If a site is within 1.5km from a town centre it has been awarded a green score and if it is further than 1.5km it has been awarded an amber score.
- Health centre/GP services: If a site is within 1km from a town centre it has been awarded a green score and if it is further than 1km it has been awarded an amber score.
- Schools: The criteria for free home to school transport has been used which specifies that if a child has to walk more than two miles to a primary school or three miles to a secondary school they qualify for free home to school transport. Therefore scores are as follows: Green for a site within the statutory walking distance of 2 miles (3.2km) of a primary school or 3 miles (4.8km) of a secondary school and amber for a site that is further than these distances.

N.B. All distances measured are 'as the crow flies' although allowances have been made for large obstacles such as train lines, rivers etc.

Site Option 1 - Land North of Upper Brighton Road, Sompting Village		
Site size (ha): 0.9		
Proposed use: Residential		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	A – The site is located in zone 2 (the outer zone) of a Groundwater Source Protection Zone	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	R - No	
Will the allocation fall within an area of contaminated land?	A – No	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	G – No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	G - No	
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	A – The site is located immediately adjacent a Grade II Listed Building	Any new development on this site would need to be sensitive to the Listed Building and its setting.
Will the allocation impact upon a Conservation Area?	R – The south part of the site is located within the Sompting Village Conservation Area	Although this site is relatively small, Sompting Village Conservation Area has a unique character due to its countryside location partly within the National Park and partly within the Local Green Gap between Lancing/Sompting and Worthing. Any further expansion of Sompting Village would have a detrimental impact on the character of the Conservation Area.
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	R - Yes	
Does the site make a major contribution to the setting, character, structure and	R – Yes	This site is just located at the western end of the Sompting Village Conservation Area

environmental quality of the countryside/district?		which forms a significant part of the character of the Local Green Gap between Sompting/Lancing and Worthing. The emerging Local Plan seeks to maintain this gap and protect Sompting Village Conservation Area and its setting. The allocation of this site would therefore conflict with the aims of the emerging Local Plan, particularly in respect of its impact on the integrity of the gap.
Will the allocation impact upon the South Downs National Park?	G – Unlikely to have a significant impact on the South Downs National Park despite close proximity.	
What grade agricultural land is the site located in?	A – Grade 2 and 3a agricultural land	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	A - The site is well outside of the recommended 15 minute walk time.	
Natural and Semi-Natural Greenspace (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G – The site is within 15 minutes walk time of natural and semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	G – The site is within 5 minutes walk of amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G – The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G - 0.7km (Lyons Way Football Pitch)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G - 2.2km (Sidney Water Centre, Worthing)	
Swimming Pools (Recommended accessibility standard – 4km)	G - 2.6km (Aquarena, Worthing)	
Allotments (Recommended accessibility standard – 10 minute walk)	A – The site is well outside the recommended 10 minute walk	

standard – 10 minute drive time and 10 minute walk time)	time but is within the 10 minute drive time	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	A – No but there are known air quality issues at the nearby Lyons Farm area	Opportunities to promote sustainable forms of transport would need to be taken.
Are there any noise issues on adjacent land uses?	A – The site is adjacent to the A27. A noise assessment will be required to determine noise levels.	
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A - 1.5km (East Worthing train station)	
How far is the nearest cycle route?	A - 2.5km (National Cycle Route 2)	
How far is the nearest bus stop?	G - 0.05km (Upper Brighton Road)	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G - 0.9km (East Worthing Industrial Estate)	
Will allocation result in a loss of employment space?	G - No	
Will allocation result in development in deprived areas?	G – Peverel Ward is the 20 th most deprived ward in West Sussex	The main deprivation issue for Peverel Ward is education.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	G – Flood Zone 1	Please see the Adur Sequential and Exception Test documents for more information.
Is the site at risk from surface water flooding?	A – Parts of the site are at risk from surface water flooding, particularly the southern part of the site	
Is the site at risk from ground water flooding?	G – The site has a groundwater flood emergence susceptibility of <25% which is low.	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	A - 2.5km (Worthing town centre) A - 2.6km (Lancing town centre)	
How far is the nearest health centre or GP service?	A - 1.4km (Ball Tree Surgery)	
How far is the nearest secondary school?	G -1.6km (St Andrews CofE School for Boys, Worthing)	Access to Davison CofE School involves crossing the

	1.7km (Davison CofE School for Girls, Worthing) 1.9km (Sir Robert Woodard Academy)	railway line
How far is the nearest primary school?	G - 0.4km (Bramber County First School, Worthing)	
Any other relevant information not captured above?		
No		
Recommendation and justification		
Overall score: Red		
Positives:		
<ul style="list-style-type: none"> No significant flood risk on site Development unlikely to have any significant impacts on biodiversity Minimal impact on the National Park despite its close proximity 		
Negatives:		
<ul style="list-style-type: none"> Located within the Sompting Village Conservation Area which is within the Sompting/Lancing & Worthing Local Green Gap and the Countryside. As a result, development of the site would have a negative impact on both the Local Green Gap and the rural and historic character of the Conservation Area. Development of this site could set an undesirable precedent that would impact on the Conservation Area. 		
It is considered a key priority of the Local Plan to maintain the integrity of the Local Green Gaps as well as protect the historic character of Sompting Village. This site would therefore conflict with these priorities.		

Site 2 – Sompting Fringe		
Site size (ha):19ha		
Current use: Agriculture, equestrian development, open land		
Proposed use: Residential		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	R - No	
Will the allocation fall within an area of contaminated land?	A - No	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	G - No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	A - Southernmost part of the site is adjacent to Cokeham Brookes SNCI.	It is considered that development could be directed away from the SNCI and the connected wetland habitats immediately to the north of the

		SNCI. Any new development would need to enhance this SNCI.
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	G - No	
Will allocation impact upon a Conservation Area?	G - No	
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	R - Yes	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	A - Yes	The 'Landscape Sensitivity Assessment' (2015) states that the site has a medium to high overall landscape sensitivity. However, it also states that the interface with the built up area of Sompting is poor and the landscape makes very little contribution to the setting of local residential areas. The 'Landscape and Ecological Survey of Key Sites Within the District' (2012) sets out indicative proposals that show how development could be laid out to minimise the impact on the landscape.
Would the site have an impact on the South Downs National Park?	A - Yes	The 'Landscape Sensitivity Assessment' (2015) states that the site has a high visual sensitivity from a number of viewpoints within the National Park. However, the 'Landscape and Ecological Survey of Key Sites Within the District' (2012) sets out indicative proposals that show how development could be laid out to minimise the impact on views from the National Park.
What grade agricultural land is the site located in?	A – The majority of the site is Grade 2 agricultural land	

Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	A – The site is well outside the recommended 15 minute walk time	The site is large enough to provide opportunities for new parks/gardens
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G – The site is within 15 minutes walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	G – The site is within 5 minutes walk of amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G – The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G - 0.3km (White Styles Middle School) G - 0.4km (Sompting Recreation Ground)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G - 2.3km (Lancing Manor Leisure Centre) G - 2.2km (Sidney Water Centre, Worthing)	
Swimming Pools (Recommended accessibility standard – 4km)	G - 2.2km (Aquarena, Worthing)	
Allotments (Recommended accessibility standard – 10 minute drive time and 10 minute walk time)	A – Only the southern end of the site is within a 10 minute walk of an allotment although the whole of the site is within a 10 minute drive time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	
Are there any noise issues on adjacent land uses?	G - No	
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A - 1.6km (Lancing Train Station)	
How far is the nearest cycle route?	A - 1.5km (National Cycle Route 2)	
How far is the nearest bus stop?	G - 0.16km (Sylvan Road)	
Sustainable economic development		

Criteria	Performance	Comment
How far is the nearest business/employment area?	G - 1.1km (Lancing Business Park) 0.8km (East Worthing Industrial Estate)	
Will allocation result in a loss of employment space?	G - No	
Will allocation result in development in (economically) deprived areas?	G – Peverel Ward is the 20 th most deprived ward in West Sussex	The main deprivation issue is education.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	A- Predominantly in flood zone 1 with small parts of the site in flood zone 2, 3a and 3b.	Please see the Adur Sequential and Exception Test documents for more information.
Is the site at risk from surface water flooding?	A – Parts of the site are at risk from surface water flooding, particularly the southernmost part.	
Is the site at risk from ground water flooding?	R – All of the site has a groundwater flood emergence susceptibility of >75%.	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G - 1.6km (Lancing Town Centre)	
How far is the nearest health centre or GP service?	G - 0.7km (Ball Tree Surgery)	
How far is the nearest secondary school?	G - 1.3km (Sir Robert Woodard Academy)	
How far is the nearest primary school?	G - 0.4km (Sompting Village Primary School)	
Any other information not captured above?		
Any new development on this site would be likely to exacerbate existing traffic problems on West Street. Such impacts would need to be mitigated.		
Recommendation and justification:		
Overall score: Amber		
Positives:		
<ul style="list-style-type: none"> The majority of the site is located within Flood Zone 1 and is therefore sequentially preferable to a number of other sites in the district Generally good access to public open space Some scope for well-designed sensitive development. 		
Negatives:		
<ul style="list-style-type: none"> This site (as part of a wider area) forms an important part of the Sompting-Lancing Local Green Gap. Although some development could take place on the site without compromising the integrity of the Gap, opportunities for a significant amount of development are limited. High visual sensitivity and medium-high landscape sensitivity. Development of this site would result in the loss of a significant amount of Grade 2 		

agricultural land.

- There is significant potential for groundwater flooding on site.

Despite concerns regarding the impact of development on the integrity of the Local Gap and the landscape generally, it is not considered that the negatives would outweigh the positives. The potential allocation of this site reflects the fact that there are very few unconstrained sites within the district to provide significant levels of development and that the site could accommodate some development without significant landscape impacts.

Site 3 - Sompting North		
Site size (ha): 8ha		
Current use: Agriculture		
Proposed use: Residential, community orchard, open space		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	R - No	
Will the allocation fall within an area of contaminated land?	A - No	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	G - No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	A – The site is adjacent Malthouse Meadow which is jointly managed by Adur DC and Sompting Parish Council as a wildlife conservation area.	The site promoters would need to ensure that any new development at this site does not have a detrimental impact on Malthouse Meadow.
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	G - No	
Will allocation impact upon a Conservation Area?	G - No	
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	R - Yes	
Will allocation impact upon the South Downs National Park?	A - Yes	The 'Landscape Sensitivity Assessment' (2015) states that the site has a medium visual sensitivity from a number of

		viewpoints within the National Park. However, the 'Landscape and Ecological Survey of Key Sites Within Adur District' (2012) sets out indicative proposals that show how development could be laid out to minimise the impact on views from the National Park.
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	A - Yes	The 'Landscape Sensitivity Assessment' (2015) states that the site has a medium overall landscape sensitivity. The study recognises that the wider site is an important part of the Strategic Gap between the housing estates of West Sompting and Sompting Village. The 'Landscape and Ecological Survey of Key Sites Within Adur' study (2012) sets out indicative proposals that show how development could be laid out to minimise the impact on the landscape and the strategic gap.
What grade agricultural land is the site located in?	A – Grade 2 agricultural land	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	A – The site is well outside the recommended accessibility standard.	
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G – The site is within 15 minutes walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	G - The site is within a 5 minute walk of amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G - The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G - 0.3km (Sompting Recreation Ground)	
Indoor Sports Facilities	G - 2.2km (Lancing Manor	Access to Lancing Manor

(Recommended accessibility standard – 4km)	Leisure Centre)	Leisure Centre would involve crossing the A27
Swimming Pools (Recommended accessibility standard – 4km)	G - 2.9km (Aquarena, Worthing)	
Allotments (Recommended accessibility standard – 10 minute drive time and 10 minute walk time)	A – The site is well outside the recommended accessibility standard of a 10 minute walk time but is within a 10 minute drive time.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	
Are there any noise issues on adjacent land uses?	A - The site is located adjacent to the A27. A noise assessment would need to be undertaken to determine noise levels.	Noise mitigation measures would need to be incorporated into any development proposal.
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A - 1.7km (East Worthing Train Station) 2km (Lancing Train Station)	
How far is the nearest cycle route?	A - 2.3km (National Cycle Route 2)	
How far is the nearest bus stop?	G - 0.24km (West Street)	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G - 1.3km (East Worthing Industrial Estate)	
Will allocation result in a loss of employment space?	G - No	
Will allocation result in development in (economically) deprived areas?	G – Peverel Ward is the 20 th most deprived ward in West Sussex	The main deprivation issue is education.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	G - Flood zone 1	Please see the Adur Sequential and Exception Test documents for more information.
Is the site at risk from surface water flooding?	A – Parts of the site are at risk from surface water flooding	
Is the site at risk from ground water flooding?	G – All of the site has a groundwater flood emergence susceptibility of <25% which is low.	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	A - 1.9km (Lancing town centre)	

How far is the nearest health centre or GP service?	G - 0.7km (Ball Tree Surgery)	
How far is the nearest secondary school?	G - 1.1km (Sir Robert Woodard Academy)	
How far is the nearest primary school?	G - 0.5km (Sompting Village Primary School)	
Any other relevant information not captured above? (deliverability and availability)		
No other relevant information		
Recommendation and justification:		
Overall score: Amber		
Positives:		
<ul style="list-style-type: none"> No significant flood risk on site Some scope for well-designed sensitive development. 		
Negatives:		
<ul style="list-style-type: none"> Located within the Sompting/Lancing and Worthing gap. This site plays a role in maintaining the Sompting- Worthing Strategic Gap. 		
Despite concerns regarding the impact of development on the integrity of the Local Gap, it is not considered that the negatives would outweigh the positives. The potential allocation of this site reflects the fact that there are very few unconstrained sites within the district to provide significant levels of development and that the site could accommodate some development without significant landscape impacts.		

Site 4 – Land to West of Highview, Mount Way, Lancing		
Site size (ha): 0.65		
Current use: Residential garden land		
Proposed use: Residential		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	R - No	
Will the allocation fall within an area of potentially contaminated land?	A - No	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)?	G - No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	A – Lancing Ring LNR/SNCI is located immediately to the north of the site.	Development would need to be designed to minimise any impacts on the LNR/SNCI

Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	G - No	
Will allocation impact upon a Conservation Area?	G - No	
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	G - No	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	G - No	
Would the site have an impact on the South Downs National Park?	A – There is potential for the site to impact on the South Downs National Park given that the site is located on the edge of the National Park.	Any development would need to be designed to minimise any impacts on the National Park.
What grade agricultural land is the site located in?	G – No classification	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	G – The site is within 15 minutes walk of a park and garden	
Natural and Semi-Natural Greenspace (Recommended accessibility standard – 15 minutes walk or 30 minutes drive time)	G – The site is within 15 minutes walk of a natural and semi natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	A – The site is located outside the 5 minute walk zone for amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G – The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G – 0.67km (Lancing Manor Park)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G – 0.72km (Lancing Manor Leisure Centre)	

standard – 4km)		
Swimming Pools (Recommended accessibility standard – 4km)	A - 4.2km (Splash Point, Worthing)	
Allotments (Recommended accessibility standard – 10 minute drive time and 10 minute walk time)	G – The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	
Are there any noise issues on adjacent land uses?	G – No	
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A – 1.70km (Lancing)	
How far is the nearest cycle route?	A – 2.4km from the Coastal Cycleway	
How far is the nearest bus stop?	G – 0.12km (Fairview Road)	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	A – 2.7km (Lancing Business Park)	
Will allocation result in a loss of employment space?	G – No	
Will allocation result in development in deprived areas?	A - No	
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	G – Flood zone 1	
Is the site at risk from surface water flooding?	A – No but see comment	The site is not shown to be susceptible to surface water flooding but given its location at the foot of the Downs, this needs to be considered in more detail at the planning application stage.
Is the site at risk from ground water flooding?	Unknown	This issue would need to be explored in more detail at the planning application stage
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G – 1.50km (Lancing town centre)	
How far is the nearest health centre or GP service?	A – 1.56km (Lancing Health Centre)	
How far is the nearest secondary school?	A – 0.89km (Sir Robert Woodard Academy)	Access to the school would involve crossing the A27
How far is the nearest primary	G – 0.39km (North Lancing	

school?	Primary School)
Any other relevant information not captured above? (deliverability and availability)	
No	
Recommendation and justification:	
<p>Overall score: Amber</p> <p>Positives:</p> <ul style="list-style-type: none"> • Within flood zone 1 <p>Negatives:</p> <ul style="list-style-type: none"> • Greenfield site (although it is located within the Built Up Area Boundary) • Relatively significant distance from a number of services and facilities. <p>The site is greenfield but within the built up area. Given the difficulties in meeting Objectively Assessed Needs in the district and the need to use acceptable greenfield sites as well as brownfield sites, it is not considered that the negative impacts of this site would outweigh the positive impacts.</p>	

Site 5 - New Monks Farm, Lancing		
Site size (ha): 27ha (development area) + 34ha (country park)		
Current use: Small scale residential, agriculture, equestrian development		
Proposed use: Residential, employment generating uses, community facilities (including a school), open space, country park		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	R - No	
Will the allocation fall within an area of potentially contaminated land?	A - No	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	G - No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	A - Yes	The following BAP habitats are present on the site: Standing water, hedgerows and reedbed. A number of BAP species are present or may occur on site including annual beard grass which is a nationally and county scarce plant.
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon	A – See comment	There is no SAM on the site

a Scheduled Ancient Monument?		but there is one to the north of Shoreham Airport which is close by. A new access road would be required to serve any new development at New Monks Farm which could impact on the SAM depending on the road's location.
Will allocation impact upon a Listed Building?	G – There are no Listed Buildings on the site or immediately adjacent	
Will allocation impact upon a Conservation Area?	G – The site is not within or adjacent to a Conservation Area	
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	R - Yes	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	A - Yes	The 'Adur Landscape Sensitivity Assessment' (2015) states that the New Monks Farm site (that area proposed for built development) has an overall medium-low landscape sensitivity and is less visible in sensitive views. However, the 'Landscape and Ecological Survey of Key Sites Within Adur' study (2012) recognises that the fields to the east of Mash Barn, which form part of the central landscape of the gap, make an important contribution to its openness and 'greenness'.
Would the site have an impact on the South Downs National Park?	A – Yes, there is potential for an impact on key views from the National Park if development is not adequately screened and landscaped.	The 'Adur Landscape Sensitivity Assessment' (2015) states that much of the site has a low visual sensitivity from a number of viewpoints within the National Park other than from Hoe Court Farm where the central part of the site (to the east of Mash Barn Lane) is prominent. However, the 'Landscape and Ecological Survey of Key Sites Within Adur' (2012) study sets out indicative proposals that show how development could be laid out to minimise the impact on views from the National Park.
What grade agricultural land is	A – The site comprises Grade	

the site located on?	2 and Grade 3b agricultural land	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and Gardens (Recommended accessibility standard – 15 minute walk time)	G - The site is within 15 minutes walk of a park and garden	
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G - The site is within 15 minutes walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	A – The majority of the site is within a 5 minute walk of amenity greenspace	The site is large enough to provide opportunities for new amenity greenspace as part of any development
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G - The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	A - 0.5km (Lancing Manor)	Access to Lancing Manor would involve crossing the A27
Indoor Sports Facilities (Recommended accessibility standard – 4km)	A - 0.5km (Lancing Manor Leisure Centre)	Access to Lancing Manor leisure centre would involve crossing the A27
Swimming pool (Recommended accessibility standard – 4km)	A - 4.6km (Wadurs)	Wadurs swimming pool is 0.6km further than the recommended standard in the Adur Open Space, Sport and Recreation Study 2005
Allotments (Recommended accessibility standard – 10 minute drive time and 10 minute walk time)	G - The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	
Are there any noise issues on adjacent land uses?	A – Yes. The site is in relatively close proximity to Shoreham Airport. The northern part of the site is situated adjacent to the A27. A noise assessment would need to be undertaken to determine noise levels.	It should be noted that despite the site's proximity to Shoreham Airport, it falls outside of Shoreham Airport's noise contours as set out in the Shoreham Airport Noise Action Plan 2010-2015. With regard to road noise, should the noise assessment raise significant concerns, residential development could be directed away from the

		A27.
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A - 1.2km (Lancing train station)	
How far is the nearest cycle route?	A - 1.5km (National Cycle Route 2) A - 1.8km (National Route 79)	Neither of these cycle routes would be easy to access from the site as to access cycle route 2 would involve crossing a railway line and access to route 79 is likely to require use of the A27. New development at New Monks Farm and the airport could provide improvements to the cycle network in this area.
How far is the nearest bus stop?	G - 0.2km (Shadwells Road)	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G - 1.4km (Shoreham Airport) G - 1.2 km (Lancing town centre)	The current proposal for this site includes the provision of new employment floorspace.
Will allocation result in a loss of employment space?	G – No.	The current proposal for this site includes the provision of new employment floorspace.
Will allocation result in development in deprived areas?	G – Mash Barn Ward (12 th most deprived ward in West Sussex)	Main deprivation issues relate to education and living environment.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	R - Predominantly in flood zone 3a with parts in flood zone 1 and 2	Please see the Adur Sequential and Exception Test documents for more information.
Is the site at risk from surface water flooding?	R – Parts of the site are at risk from surface water flooding, particularly the northern section.	Surface water flooding is a particular issue at this site.
Is the site at risk from ground water flooding?	R – The majority of the site has a groundwater flood emergence susceptibility of >75%. The remainder of the site has a susceptibility of >50% <75%	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G - 1.2km (Lancing town centre)	
How far is the nearest health centre or GP service?	G - 0.4km (Old Shoreham Road Practice)	
How far is the nearest secondary school?	G - 1.4km (Sir Robert Woodard Academy)	

	A - 1.4km (Lancing College Independent School)	Access to Lancing College would involve crossing the A27. It should be noted however that there are opportunities to provide a new school on the New Monks Farm site.
How far is the nearest primary school?	G - 0.9km (North Lancing Primary School)	Access to North Lancing Primary School involves crossing the A27
	G - 1.1km (The Globe Primary School)	
	G - 1.2km (Ardmore Nursery School)	
	G - 1km (Seaside Primary School)	Access to Seaside Primary School would involve crossing the railway line.
Any other information not captured above?		
Significant levels of development at this site would require a new access from the A27 which could have viability/deliverability implications.		
Development at this site requires a comprehensive flood solution. Significant work to assess ground water flooding has been undertaken and the results currently indicate that such flood risk could be mitigated.		
Recommendation and justification:		
<p>Overall score: Amber</p> <p>Positives:</p> <ul style="list-style-type: none"> • Would result in new development in an area of deprivation • Relatively well connected to services and open space • A significant amount of the site is in an area of low landscape sensitivity <p>Negatives:</p> <ul style="list-style-type: none"> • Greenfield site located within the Shoreham-Lancing local gap. Any development to the east of Mash Barn Lane could affect the integrity of the gap and would be more visible in views from the National Park. • Predominantly located within flood zone 3a and there are significant surface water and groundwater flooding issues on this site. <p>Despite some concerns regarding this site, there is potential to minimise the impact on the integrity of the Shoreham-Lancing Local Green Gap, and although there are significant flood risk concerns on the site, development of the site is not dependent on the construction of the Shoreham Tidal Walls Scheme. Therefore it is considered that the positives outweigh the negatives for this site.</p>		

Site 6 - Land North West of the Hasler Estate, Lancing		
Site size (ha): 24.4		
Current use: Small scale residential, equestrian development, agriculture		
Proposed use: Residential		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	R - No	
Will the allocation fall within an area of contaminated land?	A - No	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	G – No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	A - Yes	<p>The following BAP habitats are present on the site: Grazing marsh, standing water, hedgerows, reed bed, lowland mixed deciduous woodland, and wet woodland are all available on site. The site comprises a diverse range of habitat types and a range of riparian habitats along a series of ditches that flow eastwards. The riparian habitats provide a valuable ecological network, particularly where they are adjacent to a mosaic of scrub, meadow and woodland habitats.</p> <p>A number of BAP species are present or may occur on the site.</p>
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	A – The site is in relatively close proximity (0.14km at its nearest point) to a Grade II Listed Building.	Any new development on this site would need to take account of the setting of the Listed Building. English Heritage have expressed

		concerns regarding the impact on this Listed Building.
Will allocation impact upon a Conservation Area?	G - No	
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	R - Yes	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	A - No	The 'Landscape Sensitivity Assessment' (2015) states that the site has a medium/medium-low landscape sensitivity but its relatively enclosed character, which appears 'wooded' in long distance views across the gap contrasts with other parts of the Lancing Gap and contributes to the landscape setting of Lancing. The 'Landscape and Ecological Survey of Key Sites Within Adur' (2012) sets out indicative proposals that show how development could be laid out to minimise the impact on the landscape.
Will allocation impact upon the South Downs National Park?	A – Yes, but relatively minor impact	The 'Landscape Sensitivity Assessment' (2015) states that the site has a relatively low visual sensitivity from a number of viewpoints within the National Park.
What grade agricultural land is the site located on?	A – Grade 3b agricultural land	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and Gardens (Recommended accessibility standard – 15 minute walk time)	A – Only part of the site is within 15 minutes walk of a park/garden	The site is potentially large enough to allow opportunities for provision of a new park/garden
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G - The site is within 15 minutes walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	A – The majority of the site is within a 5 minute walk of amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 5 minute walk time)	G - The site is within 15 minutes walk of a children's play area	

standard – 15 minute walk time)		
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G - 0.6km (East Lancing Recreation Ground)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	A - 1.4km (Lancing Manor Leisure Centre)	Pedestrian access to Lancing Manor Leisure Centre would involve crossing the A27.
Swimming pool (Recommended accessibility standard – 4km)	A - 4.6km (Wadurs)	
Allotments (Recommended accessibility standard – 10 minute drive time and 10 minute walk time)	G - The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	
Are there any noise issues on adjacent land uses?	R – There are noise issues associated with the proximity of Shoreham Airport.	Part of the site (mainly towards the eastern end) fall within the noise contours of Shoreham Airport. This doesn't necessarily rule out development but noise impacts should be avoided and, where this is not possible, mitigated.
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A - 1.2km (Lancing train station)	
How far is the nearest cycle route?	G - 0.3km (National Cycle Route 2)	
How far is the nearest bus stop?	G - 0.3km (Brighton Road)	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G - 1.4km (Shoreham Airport) 1.2km (Lancing town centre)	
Will allocation result in a loss of employment space?	G - No	
Will allocation result in development in deprived areas?	A - No	
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	R – Combination of Flood Zone 3a and 3b	Please see the Adur Sequential and Exception Test documents for more information.
Is the site at risk from surface water flooding?	R – Parts of the site are at risk from surface water flooding	Surface water flooding has been a particular issue at this

		site following the heavy period of rainfall in late December 2012.
Is the site at risk from ground water flooding?	R – All of the site has a groundwater flood emergence susceptibility of >75%.	Groundwater flooding has been a particular issue at this site following the heavy period of rainfall in late December 2012.
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G - 1.2km (Lancing town centre)	
How far is the nearest health centre or GP service?	A – 1.1km (New Pond Road Surgery)	
How far is the nearest secondary school?	G - 2.1km (Sir Robert Woodard Academy)	
How far is the nearest primary school?	G - 0.4km (Seaside Primary School)	
Any other information not captured above?		
New development on this site would require a comprehensive flood solution to deal with tidal, surface water and groundwater issues. There has been no evidence submitted thus far to suggest that the surface water and groundwater issues can be mitigated.		
Recommendation and justification		
Overall score: Red		
Positives:		
<ul style="list-style-type: none"> Unlikely to have any significant impacts on the integrity of the Local Green Gap between Shoreham and Lancing. Relatively minimal impact on views from National Park Relatively good access to key services and open spaces. 		
Negatives:		
<ul style="list-style-type: none"> Located close to the flight path at Shoreham Airport and as a result there are some associated noise issues, particularly at the far eastern end of the site. Currently located within Flood Zone 3a and 3b and dependent on the construction of the Shoreham Tidal Walls scheme. There are also significant surface water and groundwater flooding issues on site. 		
There are significant concerns regarding this site, predominantly related to flood risk. Although tidal and fluvial flooding will be partly addressed by the construction of the Shoreham Tidal Walls, it has not been demonstrated that the significant surface water and groundwater issues on the site can be overcome and that the scheme is deliverable. These issues are too significant to deal with at the planning application stage. As a result it is considered at this stage that the negative impacts would outweigh the positive impacts.		

Site 7 - Land North East of the Hasler Estate		
Site size (ha): 18.2ha Current use: Agriculture Proposed use: Residential		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	R - No	
Will the allocation fall within an area of contaminated land?	G – There is land with some potential for contamination on the central and south eastern part of this site.	New development will provide opportunities to remediate contamination.
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	A – The far eastern end of this site adjoins part of the SSSI	Development should be directed away from the SSSI.
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	A - Yes	The following BAP habitats are present on the site: Floodplain grassland (extensive areas). A number of BAP species are present or may occur on site including red star thistle which is a nationally rare plant and listed as 'critical' in the Red Data Book of Vascular Plants (2005).
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	A – The eastern half of the site is in relatively close proximity to the Grade II* Listed Terminal Building and the Grade II Listed aircraft hangar	Any new development on this site would need to take account of the setting of the Listed Buildings
Will allocation impact upon a Conservation Area?	G - No	
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	R - Yes	
Will allocation impact upon the South Downs National Park?	R – Yes	The 'Landscape Sensitivity Assessment' (2015) states that

		the site has a medium-high visual sensitivity from a number of viewpoints within the National Park. It also states that in long distance views from the Downs the open fields provide a valuable 'slice of green' separating the urban areas to the south from the buildings of Shoreham Airport. The 'New Salts Farm – Landscape and Visual appraisal of development proposals' (2016) study sets out a number of potential mitigation measures that could help to minimise impact of development on views from the National Park. However, there are still concerns regarding the impact such a development would have on the local green gap.
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	R - Yes	The 'Landscape Sensitivity Assessment' (2015) states that the site has a medium-high overall landscape sensitivity and is less visible in sensitive views. However, the study also recognises that the site provides a valuable 'slice of green' separating the urban areas to the south from the buildings of Shoreham Airport. The site also contributes to the setting of the Adur Estuary. The 'New Salts Farm – Landscape and Visual appraisal of development proposals' (2016) study sets out a number of potential mitigation measures that could help to minimise impact of development on the Local Green Gap. However, there are still concerns regarding the impact such a development would have on the gap.
What grade agricultural land is the site located in?	A – Parts of the site comprise Grade 3a and 3b agricultural land	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each		

of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	A – The site is outside of the recommended accessibility standard	The site is potentially large enough to allow opportunities for the provision of a park / garden
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G – The site is within 15 minutes walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	G – The site is within a 5 minute walk of amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G – The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G - 0.5km (East Lancing Recreation Ground)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	A - 1.7km (Lancing Manor Leisure Centre)	Access to Lancing Manor Leisure Centre would involve crossing the A27.
Swimming Pools (Recommended accessibility standard – 4km)	G - 3.5km (Wadurs)	
Allotments (Recommended accessibility standard – 10 minute drive time and 10 minute walk time)	G – The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	A – The Shoreham High Street AQMA is relatively close to the eastern end of the site. Any traffic travelling east from the site is likely to impact on this AQMA.	
Are there any noise issues on adjacent land uses?	R – There are noise issues associated with the proximity of Shoreham Airport. The southernmost part of the site is adjacent to the A259 and the northernmost part is adjacent the railway line. A noise assessment would need to be undertaken to determine noise levels.	Part of the site (mainly at the western end) fall within noise contours of Shoreham Airport. This doesn't necessarily rule out development but noise impacts should be avoided and, where this is not possible, mitigated.
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A - 1.6km (Shoreham-By-Sea train station)	

	A - 1.6km (Lancing train station)	
How far is the nearest cycle route?	G - 0.5km (National Cycle Route 2)	
How far is the nearest bus stop?	G - 0.4km (Brighton Road)	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G - 0.5km (Shoreham Airport)	
Will allocation result in a loss of employment space?	G - No	
Will allocation result in development in deprived areas?	A - No	
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	R – Combination of Flood Zone 3a and 3b	Please see the Adur Sequential and Exception Test documents for more information.
Is the site at risk from surface water flooding?	R – Parts of the site are at risk from surface water flooding	Surface water flooding is a particular issue at this site.
Is the site at risk from ground water flooding?	R – The site has a groundwater flood emergence susceptibility of >75%.	Groundwater flooding is a particular issue at this site.
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	A - 1.5km (Shoreham-By-Sea town centre)	
How far is the nearest health centre or GP service?	A - 1.6km (Shoreham Health Centre)	
How far is the nearest secondary school?	A - 2.6km (Sir Robert Woodard Academy)	Access to Sir Robert Woodard Academy would involve crossing the railway line.
	A - 2km (Lancing College Independent School)	Access to Lancing College would involve crossing the A27
How far is the nearest primary school?	G - 1.2km (Seaside Primary School)	
Any other information not captured above?		
New development on this site would require a comprehensive flood solution to deal with tidal, surface water and groundwater issues. There has been no evidence submitted thus far to suggest that the surface water and groundwater issues can be mitigated.		
Recommendation and justification		
Overall score: Red		
Positives:		
<ul style="list-style-type: none"> Relatively good access to key services and open space. 		
Negatives:		
<ul style="list-style-type: none"> Located close to the airport flight path which raises significant noise concerns The site has a medium-high visual sensitivity and makes a significant contribution to the Shoreham-Lancing gap. Development in this location could compromise the integrity of the 		

gap as well as having an impact on views across the gap north-south and east-west. The site contributes to the overall setting of nearby settlements.

- Currently located within flood zone 3a and 3b and development on site is dependent on the construction of the Shoreham Tidal Walls. There are also significant surface water and groundwater flooding issues on site.

There are significant concerns regarding this site, predominantly related to flood risk. Although tidal and fluvial flooding will be partly addressed by the construction of the Shoreham Tidal Walls, it has not been demonstrated that the significant surface water and groundwater issues on the site can be overcome and that the scheme is deliverable. These issues are too significant to deal with at the planning application stage. Additionally, this site makes a significant contribution to the Shoreham-Lancing gap. As a result it is considered that the negative impacts outweigh the positive impacts.

Site 8 – Lancing Manor Filling Station

Site size (ha): 0.22

Current use: Vacant – previously used for car storage

Proposed use: Residential

Water quality

Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	

Land use efficiency

Criteria	Performance	Comment
Will the allocation make use of previously developed land?	G - Yes	
Will the allocation fall within an area of potentially contaminated land?	G - Yes	Development of the site would provide opportunities for remediation of potential contamination

Biodiversity

Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)?	G - No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	G - No	

Historic environment

Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	G - No	
Will allocation impact upon a Conservation Area?	G - No	

Countryside

Criteria	Performance	Comment
Is the site within the	G - No	

countryside?		
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	G - No	
Would the site have an impact on the South Downs National Park?	A – There is potential for the site to impact on the South Downs National Park given that the site is located on the edge of the National Park.	Any development would need to be designed to minimise any impacts on the National Park.
What grade agricultural land is the site located in?	G – No classification	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	G – The site is within 15 minutes walk of a park and garden	
Natural and Semi-Natural Greenspace (Recommended accessibility standard – 15 minutes walk or 30 minutes drive time)	G – The site is within 15 minutes walk of a natural and semi natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	A – The site is located just outside the 5 minute walk zone for amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G – The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G – 0.3km (Lancing Manor Park)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G – 0.3km (Lancing Manor Leisure Centre)	
Swimming Pools (Recommended accessibility standard – 4km)	A - 4.5km (Waders Swimming Pool)	
Allotments (Recommended accessibility standard – 10 minute drive time and 10 minute walk time)	G – The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	

Are there any noise issues on adjacent land uses?	R – The site is located adjacent to the A27 trunk road.	Development would need to ensure that any noise impacts from the A27 are minimised/mitigated.
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A – 1.55km (Lancing)	
How far is the nearest cycle route?	A – 1.76km from the Downs Link Cycleway	
How far is the nearest bus stop?	G – 0.11km (A27)	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	A – 2.6km (Shoreham Airport) A – 2.3km (Lancing Business Park)	
Will allocation result in a loss of employment space?	G – No	
Will allocation result in development in deprived areas?	G - Yes	The site is located adjacent to the Mash Barn ward which suffers from deprivation issues.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	R – Just over half the site is within Flood Zone 3a	Any new development will need to incorporate flood mitigation measures.
Is the site at risk from surface water flooding?	A – No but see comment	The site is not shown to be susceptible to surface water flooding but given its location at the foot of the Downs, this needs to be considered in more detail at the planning application stage.
Is the site at risk from ground water flooding?	R – The site has a groundwater flood emergence susceptibility of >75%.	This would need to be explored in more detail at the planning application stage.
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G – 1.26km (Lancing town centre)	
How far is the nearest health centre or GP service?	G – 1.44km (Lancing Health Centre)	
How far is the nearest secondary school?	A - 1.53km (Sir Robert Woodard Academy)	Access to this school would require crossing the A27.
How far is the nearest primary school?	G – 0.69km (North Lancing Primary School)	
Any other relevant information not captured above? (deliverability and availability)		
No		
Recommendation and justification:		
Overall score: Amber		

Positives:

- Brownfield site within the Built-Up Area and would have no impact on the countryside/landscape
- Within flood zone 1
- Unlikely to have any significant impacts on biodiversity

Negatives:

- Significant potential for ground water flooding
- Part of the site is within flood zone 3a (high probability)
- Significant potential for noise issues due to proximity to A27

Despite some negatives, the site is brownfield and within the built up area. Mitigation measures to ensure minimise noise from the A27 would be required but this could be dealt with at the planning application stage. It is considered that the positive impacts of developing the site would outweigh the negative impacts.

Site 9 - Shoreham Gateway

Site size (ha): 2.5

Current use: Horse Grazing

Proposed use: Employment, residential

Water quality

Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	A – Yes, within zone 3 of Groundwater Source Protection Zone	

Land use efficiency

Criteria	Performance	Comment
Will the allocation make use of previously developed land?	R - No	
Will the allocation fall within an area of potentially contaminated land?	A – No	

Biodiversity

Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)?	A – The site is immediately adjacent the River Adur SSSI so there is potential for the site to have an impact.	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	G - No	

Historic environment

Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	A – The Grade I St Nicholas Church and Grade II* Toll Bridge are located close to the site.	Any new development on this site would need to be sensitive to the Listed Buildings and their setting.
Will allocation impact upon a	A – The southern end of the site	Any new development on this

Conservation Area?	borders on the Old Shoreham Conservation Area.	site would need to be sensitive to the setting of the Conservation Area.
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	R - Yes	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	R - Yes	The Shoreham Gateway Landscape Study (2016) concludes that the site makes a significant contribution to the setting of Shoreham and the River Adur, particularly when viewed from the well-used Downs link immediately to the west of the site, and the Tollbridge. The site not only acts as a gateway to Shoreham but a gateway from Shoreham to the National Park. The site is an important part of the gateway sequence of views and spaces on the northern edge of Shoreham and development of the site would be an unwelcome urbanisation.
Would the site have an impact on the South Downs National Park?	A – The site is close to the National Park but would be unlikely to have a significant impact on its setting or views from the Park.	
What grade agricultural land is the site located in?	G – No classification	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	G - The site is within 15 minutes walk of a park/garden	Access via the Downs Link Cycle Route 79
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G - the site is within 15 minutes walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	A – This site is located outside of recommended 5 minute walk time	
Provision for Children and Young People (Recommended accessibility standard – 5 minute walk time)	G - The site is within 15 minutes walk of a children's play area	

standard – 15 minute walk time)		
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G – 2.2km (Lancing Manor Leisure Centre)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G – 2.2km (Lancing Manor Leisure Centre)	
Swimming Pools (Recommended accessibility standard – 4km)	G - 2.8km (Waders Swimming Pool)	
Allotments (Recommended accessibility standard – 10 minute drive time or 10 minute walk time)	G - The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	
Are there any noise issues on adjacent land uses?	R - Yes	The site borders to its north the elevated A27 road junction and to its east the A283 Steyning Road, both of which have heavy traffic flows.
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A – 1.3km to Shoreham-By-Sea train station	
How far is the nearest cycle route?	G - Immediately adjacent National Cycle Route 79 (Downs Link)	
How far is the nearest bus stop?	G - 0.075km	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G - Ricardo UK Ltd is 0.25km from the site and Shoreham Airport is 0.83km	
Will allocation result in a loss of employment space?	G - No	
Will allocation result in development in deprived areas?	A - No	
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	R – Predominantly in Flood Zone 3a with approximately 1/3 in Flood Zone 2 and a small amount in Flood Zone 3b.	Please see the Adur Sequential and Exception Test documents for more information.
Is the site at risk from surface water flooding?	A – A relatively large part of the site is at potential risk from surface water flooding.	
Is the site at risk from ground	R – All of the site has a	

water flooding?	groundwater flood emergence susceptibility of >75%.	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G - 1.2km (Shoreham-By-Sea town centre)	
How far is the nearest health centre or GP service?	G – 1.2km (Shoreham Health Centre)	
How far is the nearest secondary school?	G - 2.9km (Shoreham Academy)	
	A – 1.3km (Lancing College Independent School)	Access to Lancing College would involve crossing the A27
	G - 3km (Shoreham College Independent School)	
How far is the nearest primary school?	G - 0.9km (Swiss Gardens Primary School)	
Any other relevant information not captured above? (deliverability and availability)		
No		
Recommendation and justification:		
Overall score: Red		
Positives:		
<ul style="list-style-type: none"> Good access to key services and open spaces 		
Negatives		
<ul style="list-style-type: none"> The site is located within the Shoreham-Lancing Gap. Although the site is on the very edge of the gap, it makes a significant contribution to the setting of the River Adur and the Old Shoreham Conservation Area and acts a gateway to both Shoreham and the National Park. The site is an important part of the gateway sequence of views and spaces on the northern edge of Shoreham and the development of the site would be an unwelcome urbanisation. The majority of the site is located within Flood Zone 3a and there are surface water and potentially significant groundwater flooding issues. Potential for significant noise issues given the proximity of the site to the A27 and the A283. 		
It is considered a key priority of the Local Plan to maintain the integrity of the Local Green Gaps and protect the setting of the River Adur and the main settlements within Adur. As a result, It is considered that development of this site would conflict with these priorities and therefore the negative impacts would outweigh the positive impacts.		

Site 10 – Mill Hill Site		
Site size (ha): 5.84 Current use: Grazing Proposed use: Residential		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	A – Yes, within zone 1 (Inner Zone) of a Groundwater Source Protection Zone	Less of an issue for residential development
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	R - No	
Will the allocation fall within an area of potentially contaminated land?	A – No	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)?	G - No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	A – Potential for impact	The Mill Hill SNCI is located immediately adjacent to the north/north-west of the site
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	A – The Grade II Listed Building 'Adur Lodge' is located immediately to the south of the site.	Any new development on this site would need to be sensitive to the Listed Building and its setting.
Will allocation impact upon a Conservation Area?	A – The southern end of the site borders on the Old Shoreham Conservation Area.	Any new development on this site would need to be sensitive to the setting of the Conservation Area.
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	R - Yes	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	R - Yes	The 'Landscape Sensitivity Assessment' (2015) assessed the site as having a high overall landscape sensitivity. The study states the following: The open, pasture is highly vulnerable to development, which could detract from its role in providing a strong visual backdrop to Old Shoreham and a link between

		the Downs and the extensive band of urban development along the coast. There is a critical balance between scale and openness - the field is currently perceived as part of the Downs because of its verdant openness and relatively expansive scale. However, any reduction in the size and openness of the field risks resulting in a change in character, as the field could potentially be perceived as a small urban fringe paddock rather than a component of the sweeping Downs landscape.
Would the site have an impact on the South Downs National Park?	R – Yes	The site is very close to the National Park and would be prominent in highly sensitive views from Lancing Ring. This open grassy slope is perceived as the lower flank of Mill Hill at the only point where an undeveloped part of the Downs extends across the A27 and down into the settlement of Old Shoreham.
What grade agricultural land is the site located in?	G – No classification	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	G - The site is within 15 minutes walk of a park/garden	
Natural and Semi-Natural (Recommended accessibility standard – 10 minutes walk or 30 minutes drive time)	G - the site is within 15 minutes walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	A – The western section of the site falls just outside the 5 minute walk zone.	The site could provide opportunities to provide new amenity greenspace.
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G - The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G – 0.98km (Buckingham Park)	

Indoor Sports Facilities (Recommended accessibility standard – 4km)	G – 2.5km (Lancing Manor Leisure Centre)	
Swimming Pools (Recommended accessibility standard – 4km)	G - 2.4km (Waders Swimming Pool)	
Allotments (Recommended accessibility standard – 10 minute drive time and 10 minute walk time)	G - The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	
Are there any noise issues on adjacent land uses?	R - Yes	The A27 is located immediately to the north of the site and the Shoreham flyover junction is located immediately to the west.
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	A – 1.25km to Shoreham-By-Sea train station	
How far is the nearest cycle route?	G – 0.45km from the National Cycle Route 79 (Downs Link)	
How far is the nearest bus stop?	G – Immediately adjacent the south-east boundary of the site	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G - Ricardo UK Ltd is 0.84km from the site and Shoreham Airport is 1.8km	
Will allocation result in a loss of employment space?	G - No	
Will allocation result in development in deprived areas?	A - No	
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	G – Flood Zone 1	Please see the Adur Sequential and Exception Test documents for more information.
Is the site at risk from surface water flooding?	G – No	
Is the site at risk from ground water flooding?	G – The site has a groundwater flood emergence susceptibility of <25%.	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G - 1.3km (Shoreham-By-Sea town centre)	
How far is the nearest health	G – 1.2km (Shoreham Health	

centre or GP service?	Centre)	
How far is the nearest secondary school?	G - 2.6km (Shoreham Academy)	
	A – 1.5km (Lancing College Independent School)	Access to Lancing College would involve crossing the A27
	G – 2.7km (Shoreham College Independent School)	
How far is the nearest primary school?	G - 0.9km (Swiss Gardens Primary School)	
Any other relevant information not captured above? (deliverability and availability)		
No		
Recommendation and justification:		
Overall score: Red		
Positives:		
<ul style="list-style-type: none"> No potential impact on any SSSIs. The site is not adjacent to an AQMA. The site is generally well-connected to services and education facilities No flood risk issues. 		
Negatives:		
<ul style="list-style-type: none"> The site is greenfield, located within the countryside, is of high overall landscape sensitivity and is clearly visible from sensitive views in the National Park Potential for significant noise issues given the proximity of the site to the A27 and the flyover. 		
Given the sensitivity of the site in respect of its landscape value and its relatively prominent location, it is considered that development of this site would have a significant negative impact on the landscape.		

Site 11 - Pond Road, Shoreham-by-Sea		
Site size (ha): 1.2ha		
Current use: Health centre, library, vacant residential care home		
Proposed use: Community uses, residential, potential for ancillary retail		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	G - Yes	
Will the allocation fall within an area of contaminated land?	A - No	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	G - No	
Will allocation impact upon an	G - No	

SNCI, LNR or any other BAP habitat?		
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	A – The Grade I Listed St Marys Church is located immediately to the north of the site	Development at this site needs to be sympathetically designed to ensure that it does not impact on the Grade I Listed Church. However, there is potential for new development to improve the appearance of the area as the existing development at Pond Road is relatively unsympathetic.
Will allocation impact upon a Conservation Area?	A – The site is within a Conservation Area	Although the site is within a Conservation Area, it is already developed and there is a good opportunity to replace the existing unsympathetic development on the site and improve the quality of the built environment in the area.
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	G - No	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	G - No	
Would the site have an impact on the South Downs National Park?	G - No	
What grade agricultural land is the site located in?	G – N/A	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 5 minute walk time)	G - The site is within 15 minutes walk of a park/garden	
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G - The site is within 15 minutes walk of a natural / semi-natural greenspace	
Amenity Greenspace	G - The site is within a 5	

(Recommended accessibility standard – 5 minute walk time)	minute walk of amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G - The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G - 0.3km (Brighton Road Moorings)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G - 2.9km (Lancing Manor Leisure Centre) G- 3km (Southwick Leisure Centre)	
Swimming Pools (Recommended accessibility standard – 4km)	G - 2.1km (Waders Swimming Pool)	
Allotments (Recommended accessibility standards – 10 minute drive time and 10 minute walk time)	G - The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	
Are there any noise issues on adjacent land uses?	G - No	
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	G - 0.2km (Shoreham-By-Sea train station)	
How far is the nearest cycle route?	G - 0.1km (NCN2)	
How far is the nearest bus stop?	G - 0.2km (Ham Road)	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G – Within Shoreham town centre	
Will allocation result in a loss of employment space or jobs?	G - No	
Will allocation result in development in deprived areas?	G – St Mary's Ward (15 th most deprived ward in West Sussex)	Main deprivation issues relate to health and disability, education and living environment.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	G – The site is located within flood zone 1	
Is the site at risk from surface water flooding?	R – A significant amount of the site is at risk from surface water flooding	

Is the site at risk from ground water flooding?	R – All of the site has a groundwater flood emergence susceptibility of >75%.	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G - The site is within the town centre	
How far is the nearest health centre or GP service?	G – There is a health centre on the site	The redevelopment of the site would involve the provision of a new health centre
How far is the nearest secondary school?	G - 1.9km (Shoreham College Independent School) 2m (Shoreham Academy)	
How far is the nearest primary school?	G - 0.4km (Swiss Gardens Primary School)	
Any other information not captured above? (deliverability and availability)		
No		
Recommendation and justification		
Overall score: Amber		
Positives:		
<ul style="list-style-type: none"> • Brownfield site within Shoreham-by-Sea town centre and would have no impact on the countryside/landscape • Good access to key services and open spaces • Unlikely to have any major impacts on biodiversity 		
Negatives:		
<ul style="list-style-type: none"> • Significant potential for surface water and ground water flooding. 		
This site generally scores well against many of the sustainability criteria.		

Site 12 - Adur Civic Centre, Ham Road, Shoreham-by-Sea		
Site size (ha): 1		
Current use: District Council offices		
Proposed use: Residential-led mixed use development		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	G - Yes	
Will the allocation fall within an area of potentially contaminated land?	G – The eastern part of this site has potential for contamination so new development on this site could provide opportunities for remediation.	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	G - No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	G - No	
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	G – No	
Will allocation impact upon a Conservation Area?	G - No	
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	G - No	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	G - No	
Would the site have an impact on the South Downs National Park?	G - No	
What grade agricultural land is the site located in?	G – N/A	

Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk)	G - The site is within 15 minutes walk of a park/garden	
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G - The site is within 15 minutes walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	A – The site is located just outside of the recommended 5 minute walk time	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G - The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G - 0.2km (Brighton Road Moorings)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G - 2.6km (Southwick Leisure Centre)	
Swimming Pools (Recommended accessibility standard – 4km)	G – 1.8km (Waders Swimming Pool)	
Allotments (Recommended accessibility standards – 10 minute drive time and 10 minute walk time)	G - The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	R – The site is located adjacent to the Shoreham-By-Sea AQMA.	
Are there any noise issues on adjacent land uses?	A – The site is located near a congested, relatively noisy part of the A259. A noise assessment would need to be undertaken.	
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	G - 0.3km (Shoreham-By-Sea train station)	
How far is the nearest cycle route?	G - 0.3km (NCR2)	
How far is the nearest bus stop?	G - 0.02km (Ham Road)	

Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G – Within Shoreham town centre and adjacent to Shoreham Harbour.	
Will allocation result in a loss of employment space or jobs?	A – Current use is employment (B1) although employment generating uses proposed on site as part of new development. Additionally, the current jobs on-site are being relocated rather than lost.	
Will allocation result in development in deprived areas?	G – St Mary's Ward (15 th most deprived ward in West Sussex)	Main deprivation issues relate to health and disability, education and living environment.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	R – The site is located within flood zone 3a	
Is the site at risk from surface water flooding?	R – A significant amount of the site is at risk from surface water flooding	
Is the site at risk from ground water flooding?	R – All of the site has a groundwater flood emergence susceptibility of >75%.	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G - The site is within the town centre	
How far is the nearest health centre or GP service?	G – 0.4km (Shoreham Health Centre)	The redevelopment of the site would involve the provision of a new health centre
How far is the nearest secondary school?	G 1.5km (Shoreham College Independent School) 1.6km (Shoreham Academy)	
How far is the nearest primary school?	G 0.6km (St Peters Roman Catholic Primary School) 0.6km (Buckingham Park Primary School)	Access to both these schools would involve crossing the railway line.
Any other information not captured above?		
No		
Recommendation and justification		
Overall score: Amber		
Positives:		
<ul style="list-style-type: none"> Brownfield site within Shoreham-by-Sea town centre and would have no impact on the countryside/landscape Relatively good access to key services and open spaces Unlikely to have any significant impacts on biodiversity 		

Negatives:

- Located within flood zone 3a (high probability) and there is significant potential for surface water and ground water flooding.
- Located close to Shoreham High Street AQMA

Despite some negative points, the site is brownfield and located close to the town centre, and any negative impacts of development would be outweighed by positive impacts.

Site 13 - Police Station site, Shoreham-By-Sea

Site size (ha):

Current use: Police station

Proposed use: Mixed use development including retail

Water quality

Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	

Land use efficiency

Criteria	Performance	Comment
Will the allocation make use of previously developed land?	G - Yes	
Will the allocation fall within an area of potentially contaminated land?	G - Yes	Development of this site could provide opportunities for remediation of contamination.

Biodiversity

Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	G - No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	G - No	

Historic environment

Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	G - No	
Will allocation impact upon a Conservation Area?	A – The site is adjacent to a Conservation Area	Although the site is adjacent to a Conservation Area, it is already developed and there is a good opportunity to replace the existing unsympathetic development on the site and improve the quality of the built environment in the area.

Countryside

Criteria	Performance	Comment
Is the site within the countryside?	G - No	

Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	G - No	
Would the site have an impact on the South Downs National Park?	G - No	
What grade agricultural land is the site located in?	G – N/A	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	G - The site is within a 15 minute walk of a park/garden	
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G - The site is within a 15 minute walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	G - The site is within a 5 minute walk of amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G - The site is within a 15 minute walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G - 0.3km (Brighton Road Moorings)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G – 2.9km (Southwick Leisure Centre)	
Swimming Pools (Recommended accessibility standard – 4km)	G - 2km (Waders Swimming Pool)	
Allotments (Recommended accessibility standards – 10 minute drive time and 10 minute walk time)	G - The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	A – Yes, the site is relatively close to the Shoreham High Street AQMA	
Are there any noise issues on adjacent land uses?	G - No	

Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	G - 0.07km (Shoreham-By-Sea train station)	
How far is the nearest cycle route?	G – Immediately adjacent	
How far is the nearest bus stop?	G – There is a bus stop immediately adjacent the site on Ham Road.	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G – Within Shoreham town centre	
Will allocation result in a loss of employment space or jobs?	G - No	Although the police station currently provides a significant number of jobs, these will not be lost but instead relocated. Additionally, a police presence will remain in Shoreham.
Will allocation result in development in deprived areas?	G – St Mary's Ward (15 th most deprived ward in West Sussex)	Main deprivation issues relate to health and disability, education and living environment.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	G – The site is located within flood zone 1	
Is the site at risk from surface water flooding?	G – No	
Is the site at risk from ground water flooding?	R – All of the site has a groundwater flood emergence susceptibility of >75%.	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G - The site is within the town centre	
How far is the nearest health centre or GP service?	G – 0.16km (Pond Road)	
How far is the nearest secondary school?	G - 1.8km (Shoreham College Independent School) 1.9km (Shoreham Academy)	
How far is the nearest primary school?	G - 0.5km (Swiss Gardens Primary School)	
Any other information not captured above?		
This site will not come forward until alternative arrangements for a police location in Shoreham have been made. The likely timeframe is approximately 5 years.		
Recommendation and justification		
Overall score: Amber		
Positives:		
<ul style="list-style-type: none"> Brownfield site within Shoreham-by-Sea town centre and would have no impact on the countryside/landscape Good access to key services and open spaces 		

- Unlikely to have any major impacts on biodiversity

Negatives:

- Significant potential for ground water flooding.

This site generally scores well against many of the sustainability criteria.

Site 14 - Shoreham Harbour (western arm)		
Site size (ha):		
Current use: Employment, wharfage, other port related uses		
Proposed use: Residential-led mixed use development		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	G - Yes	
Will the allocation fall within an area of potentially contaminated land?	G – Yes, nearly all the site falls within an area of potentially contaminated land so new development on this site could provide opportunities for remediation.	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)	A – The site is directly adjacent the River Adur, part of which (to the west of the site) is a SSSI	It would need to be ensured that any new development has a minimal impact on the River Adur.
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	G - No	
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	A – There are no SAMs within the site although at the far eastern end of the western arm of the Harbour is the Lighthouse.	It would need to be ensured that a development at the eastern end of the western arm doesn't have a detrimental impact on the setting of the Lighthouse.
Will allocation impact upon a Listed Building?	G – No	
Will allocation impact upon a Conservation Area?	G - No	
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	G - No	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	G - No	
Would the site have an impact on the South Downs National Park?	G - No	

What grade agricultural land is the site located in?	G – N/A	
Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	G - The site is within a 15 minute walk of a park/garden	
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G - the site is within a 15 minute walk of a natural / semi-natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk)	A – a very small part of the western arm south of the Adur Civic Centre is outside the recommended accessibility zone.	The site is large to enough to allow opportunities for provision of new amenity greenspace.
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G - The site is within a 15 minute walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G – 2.1km (Shoreham Football Club) G – 0.63km (Brighton Road Moorings)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G - 2.1km (Southwick Leisure Centre)	
Swimming Pools (Recommended accessibility standard – 4km)	G – 2.8km (Waders Swimming Pool)	
Allotments (Recommended accessibility standards – 10 minute drive time or 10 minute walk time)	G - The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	R – The western part of the site is located adjacent to the Shoreham-by-Sea AQMA.	Significant levels of new development at the Harbour would inevitably have an impact on the AQMA. New development would need to mitigate this impact as far as is practicable.
Are there any noise issues on adjacent land uses?	R – The western part of the site is located near an often congested, relatively noisy part of the A259. Additionally, there	Any new development would need to be carefully planned to ensure that there were no significant conflicts between

	are a number of port-related and other industrial activities taking place at the port which would not mix well with more noise sensitive uses such as residential.	new residential uses and existing port and industrial uses. A noise assessment would need to be undertaken.
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	G - 0.8km (Shoreham-by-Sea train station)	
How far is the nearest cycle route?	G – The NCR2 is 0.7km from the western arm of the Harbour.	
How far is the nearest bus stop?	G – There are a number of bus stops immediately adjacent the Harbour on the A259 served by the frequent 700 Coastrider.	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	G – The port itself is a thriving employment area and its core operations are immediately adjacent the western arm. Dolphin Road Industrial Estate is immediately to the north of the western arm although they are separated by a railway line with relatively few access points across it.	
Will allocation result in a loss of employment space or jobs?	A – There is potential for a loss of jobs as a result of the redevelopment of the western arm of the Harbour. However, any loss will be dependent on the final mix of uses proposed at the Harbour and there are opportunities to actually increase job numbers (although employment floorspace is likely to decrease).	
Will allocation result in development in deprived areas?	G – The majority of the western arm of the Harbour is located within St Mary's Ward (15 th most deprived ward in West Sussex)	Main deprivation issues relate to health and disability, education and living environment.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	R – The site is located within flood zone 3a, 2 and 1.	
Is the site at risk from surface water flooding?	A – Some parts of the western arm of the Harbour suffer from surface water flooding but it is not a significant issue.	

Is the site at risk from ground water flooding?	R – All of the site has a groundwater flood emergence susceptibility of >75%.	
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G - The western end of the site is adjacent to the town centre. The remainder of the site has relatively good public transport links with the town centre.	
How far is the nearest health centre or GP service?	G – 0.9km (Shoreham Health Centre)	
How far is the nearest secondary school?	G 1.3km (Shoreham College Independent School) 1.7km (Shoreham Academy)	
How far is the nearest primary school?	G 0.8km (St Peters Roman Catholic Primary School)	Access to both these schools would involve crossing the railway line.
Any other information not captured above?		
There are a number of deliverability and viability issues associated with the site including the need for a comprehensive flood defence solution, remediation of contamination and the need to potentially provide a new school. Additionally, new development at the Harbour would require the relocation of a number of existing businesses.		
Recommendation and justification		
Overall score: Amber		
Positives:		
<ul style="list-style-type: none"> Brownfield site within the Built-Up Area and would have no impact on the countryside/landscape Relatively good access to key services Unlikely to have any significant impacts on biodiversity 		
Negatives:		
<ul style="list-style-type: none"> Parts of the site are located within flood zone 2 (medium probability) and 3a (high probability) and there is significant potential for ground water flooding. Located close to Shoreham High Street AQMA 		
Despite some negatives, the site is brownfield and within the built up area and any negative impact would be outweighed by the positive impacts of redevelopment.		

Site 15 – Land at Eastbrook Primary School, Manor Hall Road, Manor Hall Road, Southwick		
Site size (ha): 0.7		
Current use: Vacant (previously education use)		
Proposed use: Residential		
Water quality		
Criteria	Performance	Comment
Will allocation lead to development within a Groundwater Source Protection Zone?	G - No	
Land use efficiency		
Criteria	Performance	Comment
Will the allocation make use of previously developed land?	G - Yes	
Will the allocation fall within an area of potentially contaminated land?	A - No	
Biodiversity		
Criteria	Performance	Comment
Will allocation impact upon a Site of Special Scientific Interest (SSSI)?	G - No	
Will allocation impact upon an SNCI, LNR or any other BAP habitat?	G – No	
Historic environment		
Criteria	Performance	Comment
Will the allocation impact upon a Scheduled Ancient Monument?	G - No	
Will allocation impact upon a Listed Building?	G - No	
Will allocation impact upon a Conservation Area?	G - No	Any new development on this site would need to be sensitive to the setting of the Conservation Area.
Countryside		
Criteria	Performance	Comment
Is the site within the countryside?	G - No	
Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?	G - No	
Would the site have an impact on the South Downs National Park?	G - No	
What grade agricultural land is the site located in?	G – No classification	

Accessibility to green space and outdoor facilities		
Criteria	Performance	Comment
How far is the site from each of the following open space typologies:		
Parks and gardens (Recommended accessibility standard – 15 minute walk time)	G – The site is within 15 minutes walk of a park and garden	
Natural and Semi-Natural (Recommended accessibility standard – 15 minute walk or 30 minute drive time)	G – The site is within 15 minutes walk of a natural and semi natural greenspace	
Amenity Greenspace (Recommended accessibility standard – 5 minute walk time)	G - The site is within a 5 minute walk of amenity greenspace	
Provision for Children and Young People (Recommended accessibility standard – 15 minute walk time)	G – The site is within 15 minutes walk of a children's play area	
Outdoor Sports Facilities (Recommended accessibility standard – 4km)	G – 0.10km (Southwick Recreation Ground)	
Indoor Sports Facilities (Recommended accessibility standard – 4km)	G – 0.16km (Lancing Manor Leisure Centre)	
Swimming Pools (Recommended accessibility standard – 4km)	G – 1.4km (Waders Swimming Pool)	
Allotments (Recommended accessibility standard – 10 minute drive time and 10 minute walk time)	G – The site is within a 10 minute walk time of an allotment.	
Pollution		
Criteria	Performance	Comment
Is the allocation within or near to an AQMA?	G - No	
Are there any noise issues on adjacent land uses?	G - No	
Sustainable transport		
Criteria	Performance	Comment
How far is the nearest train station?	G - 0.71km (Fishersgate) G - 0.64km (Southwick)	
How far is the nearest cycle route?	G – 0.81km from the South Coast Cycleway (2)	
How far is the nearest bus stop?	G – 0.08km Manor Hall Road	
Sustainable economic development		
Criteria	Performance	Comment
How far is the nearest business/employment area?	A – 2.1km (Dolphin Road Industrial Estate)	
Will allocation result in a loss	A – Yes but the land has been	

of employment space?	surplus to requirements for some time so the redevelopment of the site would not result in the loss of any jobs.	
Will allocation result in development in deprived areas?	G - Yes	The site is located within the Eastbrook ward which is one of the most deprived wards in Adur.
Flood risk		
Criteria	Performance	Comment
What flood zone is the site in?	G – Flood Zone 1	
Is the site at risk from surface water flooding?	G - No	
Is the site at risk from ground water flooding?	R – The site has a groundwater flood emergence susceptibility of 50% to <75%.	This would need to be explored in more detail at the planning application stage.
Accessibility to key services and centres		
Criteria	Performance	Comment
How far is the site from the nearest town centre?	G – 0.47km (Southwick town centre)	
How far is the nearest health centre or GP service?	G – 0.41km (Southwick Health Centre)	
How far is the nearest secondary school?	G - 1.2km (Shoreham Academy)	
How far is the nearest primary school?	G – Eastbrook Primary School is immediately adjacent the site	
Any other relevant information not captured above? (deliverability and availability)		
No		
Recommendation and justification:		
Overall score: Amber		
Positives:		
<ul style="list-style-type: none"> Brownfield site within the Built-Up Area and would have no impact on the countryside/landscape Within flood zone 1 Good accessibility to key services and open spaces Unlikely to have any significant impacts on biodiversity 		
Negatives:		
<ul style="list-style-type: none"> Significant potential for ground water flooding 		
On the whole, the site scores positively, is brownfield and within the built up area.		

APPENDIX IV – SPATIAL STRATEGY ALTERNATIVES APPRAISAL

Introduction

As discussed in Chapters 10 (within Part 2) above, the following four alternative spatial strategies were subjected to appraisal at an ‘interim’ plan-making / SA stage, i.e. prior to the Proposed Submission Plan being finalised:

	New homes on greenfield land	New homes at Shoreham Harbour	New homes on brownfield land	Total new homes	Total new homes per annum
A1	<ul style="list-style-type: none"> 450 at New Monks Farm, Lancing 250 at Sompting West 300 at Hasler, Lancing 	1050	870	2920	146
A2	<ul style="list-style-type: none"> 450 at New Monks Farm, Lancing 450 at Hasler, Lancing 	1050	870	2820	141
A3	<ul style="list-style-type: none"> 450 at New Monks Farm, Lancing 420 at Sompting West 	1050	870	2790	140
B	<ul style="list-style-type: none"> 600 at New Monks Farm, Lancing 600 at Hasler, Lancing 420 at Sompting West 210 at Sompting North 	1050	870	3750	188

The aim of this appendix is to present appraisal findings in full.

Methodology

For each of the options, the assessment identifies and evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see Part 1) as a methodological framework.

The following scoring system is used to identify / evaluate effects:

Green ++	Significant positive impact on Sustainability Objective
Green +	Positive impact on Sustainability Objective
0	No impact or negligible impact/ issue addressed by other policies in Local Plan / N/A (Not applicable)
Amber +/-	Mixed impacts / potential for conflict with Sustainability Objective
Red -	Negative impact on Sustainability Objective
Red --	Significant negative impact on Sustainability Objective

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how the options will be implemented ‘on the ground’ and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text. In some instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms.

Effects are predicted taking into account the criteria presented within Regulations.²⁵ So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered (i.e. where the effects of the plan may combine with the effects of other planned or on-going activity that is outside the control of the Adur Local Plan).

²⁵ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings: Spatial Strategy Alternatives

1. Increase energy efficiency and encourage the use of renewable energy sources	
	Option A1 This objective is addressed by other policies within the Plan.
	Option A2 This objective is addressed by other policies within the Plan.
	Option A3 This objective is addressed by other policies within the Plan.
	Option B This objective is addressed by other policies within the Plan.
2. Protect and enhance water quality and encourage the sustainable use of water	
	Option A1 This objective is addressed by other policies within the Plan. However, none of the sites are within a Ground Water Source Protection Zone.
	Option A2 This objective is addressed by other policies within the Plan. However, none of the sites are within a Ground Water Source Protection Zone.
	Option A3 This objective is addressed by other policies within the Plan. However, none of the sites are within a Ground Water Source Protection Zone.
	Option B This objective is addressed by other policies within the Plan. However, none of the sites are within a Ground Water Source Protection Zone.
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials	
Green	The spatial strategy for the draft Local Plan seeks to make the most efficient use of brownfield land. All of the options proposed assume that all available brownfield sites will be developed first where feasible. The greenfield sites are not alternatives to brownfield sites. Therefore it is considered that all options (A1, A2, A3 & B1) encourage the re-use of previously developed land and are consistent with this policy.
4. Conserve, protect and enhance biodiversity and habitats	
A	Option A1 It is considered that there is potential for this option to have a negative impact on biodiversity given that it involves the development of a significant amount of greenfield land. Additionally, there is a Site of Nature Conservation Importance (SNCI) just south of the Sompting fringe site which could be impacted. It should be noted however that new development offers opportunities to enhance biodiversity through contributions and enhancement measures both on and off site. Policies in the Plan will ensure that such opportunities are realized.
A	Option A2 It is considered that there is potential for this option to have a negative impact on biodiversity given that it involves the development of a significant amount of greenfield land. However, unlike option A1, there are no adjacent designated sites. It should be noted however that new development offers opportunities to enhance biodiversity through contributions and enhancement measures both on and off site. Policies in the Plan will ensure that such opportunities are realized.

A	<p>Option A3</p> <p>It is considered that there is potential for this option to have a negative impact on biodiversity given that it involves the development of a significant amount of greenfield land. Additionally, there is a Site of Nature Conservation Importance (SNCI) just south of the Sompting fringe site which could be impacted.</p> <p>It should be noted however that new development offers opportunities to enhance biodiversity through contributions and enhancement measures both on and off site. Policies in the Plan will ensure that such opportunities are realized.</p>
Red -	<p>Option B</p> <p>Given that this option proposes significantly more development than option A1, A2 and A3, the potential for negative impacts is likely to be greater and more difficult to mitigate.</p> <p>Nevertheless, it should be noted however that new development offers opportunities to enhance biodiversity through contributions and enhancement measures both on and off site. Policies in the Plan will ensure that such opportunities are realized.</p>
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes	
Amber	<p>Option A1</p> <p>None of the allocations within this option are located within a Conservation Area. However, the Local Green Gaps between settlements are part of the historic landscape. New development at New Monks Farm is likely to be most prominent within the gap. There is also a Grade II Listed Building just north of the Hasler site. It will need to be ensured that new development does not impact on the setting of this building.</p>
Amber	<p>Option A2</p> <p>None of the allocations within this option are located within a Conservation Area. However, the Local Green Gaps between settlements are part of the historic landscape. New development at New Monks Farm is likely to be most prominent within the gap. There is also a Grade II Listed Building just north of the Hasler site. It will need to be ensured that new development does not impact on the setting of this building.</p>
Red -	<p>Option A3</p> <p>None of the allocations within this option are located within a Conservation Area. However, the Local Green Gaps between settlements are part of the historic landscape. New development at New Monks Farm is likely to be relatively prominent within the gap.</p> <p>Additionally, this option proposes more development at Sompting fringe which is a sensitive area given the relatively small size of the Local Green Gap between Sompting and Worthing. The open Gap also forms a key part of the setting of Sompting Village Conservation Area.</p>
Red -	<p>Option B</p> <p>None of the allocations within this option are located within a Conservation Area. However, the Local Green Gaps between settlements are part of the historic landscape. New development at New Monks Farm is likely to be relatively prominent within the gap. There is also a Grade II Listed Building just north of the Hasler site.</p> <p>Additionally, this option proposes more development at Sompting fringe as well as an additional allocation at Sompting North, both of which are sensitive areas given the relatively small size of the Local Green Gap between Sompting and Worthing. The open Gap also forms a key part of the setting of Sompting Village Conservation Area.</p>

6. Protect and enhance the countryside	
R-	<p>Option A1</p> <p>This option would involve a significant amount of development in the countryside, specifically within the Local Green Gaps between Shoreham and Lancing, and between Sompting/Lancing & Worthing. New development at New Monks Farm is likely to be relatively prominent within the gap whereas development at Hasler and Sompting would be slightly less so. Despite opportunities to mitigate the impact on the countryside through good design, this option is likely to have some negative impacts on this objective.</p>
R-	<p>Option A2</p> <p>This option would involve a significant amount of development in the countryside, specifically within the Local Green Gap between Shoreham and Lancing. New development at New Monks Farm is likely to be relatively prominent within the gap whereas development at Hasler would be slightly less so. Despite opportunities to mitigate the impact on the countryside through good design, this option is likely to have some negative impacts on this objective.</p>
R-	<p>Option A3</p> <p>This option would involve a significant amount of development in the countryside, specifically within the Local Green Gap between Shoreham and Lancing, and between Sompting/Lancing and Worthing. New development at New Monks Farm is likely to be relatively prominent within the Shoreham and Lancing Gap. This option also proposes significantly more development at Sompting Fringe and, as a result, would also be relatively prominent in the Sompting/Lancing and Worthing Gap. Despite opportunities to mitigate the impact on the countryside through good design, this option is likely to have some negative impacts on this objective.</p>
R--	<p>Option B</p> <p>Of all the options, option B would have the most significant impact as it proposes a large amount of development in the countryside, specifically within the Local Green Gap between Shoreham and Lancing, and between Sompting/Lancing and Worthing. New development at New Monks Farm is likely to be relatively prominent within the Shoreham and Lancing Gap. This option proposes a significant amount of development at Sompting Fringe (same amount as option 3) as well as an additional site at Sompting North. As a result, new development at Sompting Fringe and Sompting North would be relatively prominent in the Sompting/Lancing and Worthing Gap. Despite opportunities to mitigate the impact on the countryside through good design, this option would have significant negative impacts on this objective.</p>
7. Protect and enhance public open space / green infrastructure and accessibility to it	
Amber	<p>Option A1</p> <p>Although this option would result in the development of a significant amount of greenfield land which forms part of the green infrastructure network, there is no public access to the existing Local Green Gaps. New development within the Gaps provides opportunities for public access to and through them as well as significant amounts of green infrastructure within the development. Sompting Fringe is of particular significance as new development could improve pedestrian and cycle links to Worthing through the gap. Policies in the Plan will ensure such opportunities are realized.</p>
Amber	<p>Option A2</p> <p>Although this option would result in the development of a significant amount of greenfield land which forms part of the green infrastructure network, there is no public access to the existing Local Green Gaps. New development within the Gaps provides opportunities for public access to and through them as well as significant amounts of green infrastructure within the development. Policies in the</p>

	Plan will ensure such opportunities are realized.
Amber	<p>Option A3</p> <p>Although this option would result in the development of a significant amount of greenfield land which forms part of the green infrastructure network, there is no public access to the existing Local Green Gaps. New development within the Gaps provides opportunities for public access to and through them as well as significant amounts of green infrastructure within the development. Sompington Fringe is of particular significance as new development could improve pedestrian and cycle links to Worthing through the gap. Policies in the Plan will ensure such opportunities are realized.</p>
Amber	<p>Option B</p> <p>Although this option would result in the development of a significant amount of greenfield land which forms part of the green infrastructure network, there is no public access to the existing Local Green Gaps. New development within the Gaps provides opportunities for public access to and through them as well as significant amounts of green infrastructure within the development. Sompington Fringe is of particular significance as new development could improve pedestrian and cycle links to Worthing through the gap. Policies in the Plan will ensure such opportunities are realized.</p>
8. To reduce pollution and the risk of pollution to air, land and water	
Red -	<p>Option A1</p> <p>The main sites proposed as part of this option are all greenfield and offer no opportunities for the remediation of contaminated land.</p> <p>Although sustainable transport measures will be incorporated into each development and contributions will be sought for wider sustainable transport improvements in the district, each of the sites will cumulatively result in additional car movements on the highway network which will potentially increase air pollution.</p> <p>There is an Air Quality Management Area (AQMA) at Shoreham High Street, caused by congestion at the High Street roundabout. Traffic travelling east from the Hasler site is likely to exacerbate these problems.</p> <p>The Hasler site is also located close to Shoreham Airport and falls within some of the noise contours of the Airport. This issue would need to be considered carefully at the design stage to avoid impacts on occupiers of the development.</p> <p>New development at the Hasler site would provide the opportunity to improve the sewers in the area, many of which have collapsed. This could help to improve pollution in the area caused by sewage.</p> <p>Part of the development at New Monks Farm would be located close to the A27 which could have noise impacts on occupiers of the development. This issue would need to be carefully considered at the design stage.</p> <p>Option A1 is likely to conflict with this objective.</p>
Red -	<p>Option A2</p> <p>The main sites proposed as part of this option are all greenfield and offer no opportunities for the remediation of contaminated land.</p> <p>Although sustainable transport measures will be incorporated into each development and contributions will be sought for wider sustainable transport improvements in the district, each of the sites will cumulatively result in additional car movements on the highway network which will potentially increase air pollution.</p> <p>There is an Air Quality Management Area (AQMA) at Shoreham High Street, caused by congestion at the High Street roundabout. Traffic travelling east from the Hasler site is likely to exacerbate these problems.</p> <p>The Hasler site is also located close to Shoreham Airport and falls within some of</p>

	<p>the noise contours of the Airport. More development is proposed at the Hasler site in this option than option A1. Part of the site would also be located adjacent to the railway line which could have noise implications. These issues would need to be considered carefully at the design stage.</p> <p>New development at the Hasler site would provide the opportunity to improve the sewers in the area, many of which have collapsed. This could help to improve pollution in the area caused by sewage.</p> <p>Part of the development at New Monks Farm would be located in close proximity to the A27 which could have noise impacts on occupiers of the development. This issue would need to be carefully considered at the design stage.</p> <p>Option A2 is likely to conflict with this objective.</p>
Amber	<p>Option A3</p> <p>The main sites proposed as part of this option are all greenfield and offer no opportunities for the remediation of contaminated land.</p> <p>Although sustainable transport measures will be incorporated into each development and contributions will be sought for wider sustainable transport improvements in the district, each of the sites will cumulatively result in additional car movements on the highway network which will potentially increase air pollution.</p> <p>Part of the development at New Monks Farm would be located close to the A27 which could have noise impacts on occupiers of the development. This issue would need to be carefully considered at the design stage.</p> <p>This option does not include the Hasler site so there would be fewer issues associated with noise from the airport, the railway line, and impacts on Shoreham High Street AQMA. However, there is still potential conflict with this objective.</p>
Red --	<p>Option B</p> <p>The main sites proposed as part of this option are all greenfield and offer no opportunities for the remediation of contaminated land.</p> <p>Although sustainable transport measures will be incorporated into each development and contributions will be sought for wider sustainable transport improvements in the district, each of the sites will cumulatively result in additional car movements on the highway network which will potentially increase air pollution. This option would clearly have the most impact with regard to air pollution as it proposes significantly more housing than options A1, A2 and A3.</p> <p>There is an Air Quality Management Area (AQMA) at Shoreham High Street, caused by congestion at the High Street roundabout. Traffic travelling east from the Hasler site is likely to exacerbate these problems.</p> <p>The Hasler site is also located close to Shoreham Airport and falls within the noise contours of the Airport. The north east corner of the site would be particularly affected. More development is proposed at the Hasler site in this option than option A1 and A2. Part of the site would also be located adjacent to the railway line which could have noise implications. These issues would need to be considered carefully at the design stage.</p> <p>Part of the development at New Monks Farm and Sompting North would be located in close proximity to the A27 which could have noise impacts on occupiers of the development. This issue would need to be carefully considered at the design stage.</p> <p>Option B is likely to have significant negative impacts on this objective.</p>

9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events	
	<p>Option A1</p> <p>This is an issue that relates more to the design stage of development and is addressed by other policies within the plan.</p>
	<p>Option A2</p> <p>This is an issue that relates more to the design stage of development and is addressed by other policies within the plan. .</p>
	<p>Option 3</p> <p>This is an issue that relates more to the design stage of development and is addressed by other policies within the plan.</p>
	<p>Option B</p> <p>This is an issue that relates more to the design stage of development and is addressed by other policies within the plan.</p>
10. To improve health and wellbeing and reduce inequalities in health	
Amber	<p>Option A1</p> <p>This option proposes three large greenfield sites which provide significant opportunities for new, accessible open space. New Monks Farm also proposes a number of community facilities which could contribute to this objective.</p> <p>New development would also contribute towards new off-site community facilities including health centres/surgeries etc. However, given some of the negative impacts on pollution (assessed under Objective 8), there is still potential for conflict with this objective.</p>
Amber	<p>Option A2</p> <p>This option proposes two large greenfield sites which provide significant opportunities for new, accessible open space. New Monks Farm also proposes a number of community facilities which could contribute to this objective.</p> <p>New development would also contribute towards new off-site community facilities including health centres/surgeries etc. However, given some of the negative impacts on pollution (assessed under Objective 8), there is still potential for conflict with this objective.</p>
Amber	<p>Option A3</p> <p>This option proposes two large greenfield sites which provide significant opportunities for new, accessible open space. New Monks Farm also proposes a number of community facilities which could contribute to this objective.</p> <p>New development would also contribute towards new off-site community facilities including health centres/surgeries etc. However, given some of the negative impacts on pollution (assessed under Objective 8), there is still potential for conflict with this objective.</p>
Amber	<p>Option B - Amber</p> <p>This option proposes two large greenfield sites which provide significant opportunities for new, accessible open space. New Monks Farm also proposes a number of community facilities which could contribute to this objective. However, there is some concern that an increased number of dwellings at this site (600 for this option rather than 450 for option A1, A2 and A3 within the same footprint) could result in the provision of less community facilities.</p> <p>New development would also contribute towards new off-site community facilities including health centres/surgeries etc. However, given some of the negative impacts on pollution (assessed under Objective 8), there is still potential for conflict with this objective.</p>

11. To reduce crime, the fear of crime and antisocial behaviour	
	<p>Option A1</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option A2</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option A3</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option B</p> <p>This objective is addressed by other policies within the Plan.</p>
12. Promote sustainable transport and reduce the use of the private car	
Amber	<p>Option A1 Amber</p> <p>Development of the three sites proposed under this option would incorporate sustainable transport measures (i.e. improved cycle and pedestrian facilities) and make contributions to improving the wider sustainable transport network. Bus links adjacent to the sites are also relatively good. However, the sites are on the edge of the built up area and none of them are particularly close to a town centre or train station. Therefore there is some potential for this option to conflict with this objective.</p> <p>A mix of uses are proposed at New Monks Farm including employment which provides some opportunity for people to be able to work close to where they live.</p>
Amber	<p>Option A2 Amber</p> <p>Development of the two sites proposed under this option would incorporate sustainable transport measures (i.e. improved cycle and pedestrian facilities) and make contributions to improving the wider sustainable transport network. Bus links adjacent to the sites are also relatively good. However, the sites are on the edge of the built up area and none of them are particularly close to a town centre or train station. Therefore there is some potential for this option to conflict with this objective.</p> <p>A mix of uses are proposed at New Monks Farm including employment which provides some opportunity for people to be able to work close to where they live.</p>
Amber	<p>Option A3 Amber</p> <p>Development of the two sites proposed under this option would incorporate sustainable transport measures (i.e. improved cycle and pedestrian facilities) and make contributions to improving the wider sustainable transport network. Bus links adjacent to the sites are also relatively good. However, the sites are on the edge of the built up area and none of them are particularly close to a town centre or train station. Therefore there is some potential for this option to conflict with this objective.</p> <p>A mix of uses are proposed at New Monks Farm including employment which provides some opportunity for people to be able to work close to where they live.</p>
Amber	<p>Option B Amber</p> <p>Development of the four sites proposed under this option would incorporate sustainable transport measures (i.e. improved cycle and pedestrian facilities) and make contributions to improving the wider sustainable transport network. Bus links adjacent to the sites are also relatively good. However, the sites are on the edge of the built up area and none of them are particularly close to a town centre or train station. Therefore there is some potential for this option to conflict with this objective.</p> <p>A mix of uses are proposed at New Monks Farm including employment which provides some opportunity for people to be able to work close to where they live.</p>

13. To reduce poverty, social exclusion and social inequalities	
Green +	<p>Option A1</p> <p>This option proposes a significant amount of new residential development, as well as employment and community facilities at New Monks Farm, which would result in improved housing, new job opportunities and improved community facilities.</p>
Green +	<p>Option A2</p> <p>This option proposes a significant amount of new residential development, as well as employment and community facilities at New Monks Farm, which would result in improved housing, new job opportunities and improved community facilities.</p>
Green +	<p>Option A3</p> <p>This option proposes a significant amount of new residential development, as well as employment and community facilities at New Monks Farm, which would result in improved housing, new job opportunities and improved community facilities.</p>
Green +	<p>Option B</p> <p>This option proposes a significant amount of new residential development, as well as employment and community facilities at New Monks Farm, which would result in improved housing, new job opportunities and improved community facilities. Although this option provides more housing than Option A1, A2, A3, it is possible that the increased housing provision at New Monks Farm (600 dwellings for option B compared to 450 dwellings for options A1, A2 and A3) could result in the provision of less community facilities or employment floorspace.</p>
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing	
Green +	<p>Option A1</p> <p>Although this option (including brownfield sites) would only provide 1870 dwellings (Adur's objectively assessed housing need is 4590 dwellings) up until 2028, it still takes a proactive approach to housing considering the environmental and highway constraints in the district and would therefore contribute to this objective.</p>
Green +	<p>Option A2</p> <p>Although this option (including brownfield sites) would only provide 1770 dwellings (Adur's objectively assessed housing need is 4590 dwellings) up until 2028, it still takes a proactive approach to housing considering the relative environmental and highway constraints in the district and would therefore contribute to this objective.</p>
Green +	<p>Option A3</p> <p>Although this option (including brownfield sites) would only provide 1740 dwellings (Adur's objectively assessed housing need is 4590 dwellings) up until 2028, it still takes a proactive approach to housing considering the relative environmental and highway constraints in the district and would therefore contribute to this objective.</p>
Green ++	<p>Option B</p> <p>Although this option (including brownfield sites) would only provide 2700 dwellings (Adur's objectively assessed housing need is 4590 dwellings) up until 2028, it still takes a particularly proactive approach to housing bearing in mind the relative environmental and highway constraints in the district and would clearly contribute to this objective. This option proposes a significantly higher amount of housing than options A1, A2 and A3.</p>
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals	
	<p>Option A1</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option A2</p>

	This objective is addressed by other policies within the Plan.
	Option A3 This objective is addressed by other policies within the Plan.
	Option B This objective is addressed by other policies within the Plan.
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy	
Green +	Option A1 Up to 10,000sqm of employment generating floorspace is proposed at New Monks Farm which would contribute to this objective. Additionally, new housing development would benefit the economy through providing an increased workforce in the area, as well as jobs in the construction industry at the development stage.
Green +	Option A2 Up to 10,000sqm of employment generating floorspace is proposed at New Monks Farm which would contribute to this objective. Additionally, new housing development would benefit the economy through providing an increased workforce in the area, as well as jobs in the construction industry at the development stage.
Green +	Option A3 Up to 10,000sqm of employment generating floorspace is proposed at New Monks Farm which would contribute to this objective. Additionally, new housing development would benefit the economy through providing an increased workforce in the area, as well as jobs in the construction industry at the development stage.
Green +	Option B This option proposes significantly more housing than options A1, A2 and A3 and so will have additional benefits for the economy in respect of providing an increased workforce in the area, and providing jobs in the construction industry. Up to 10,000sqm of employment generating floorspace is proposed at New Monks Farm which would contribute to this objective. However, it is possible that the increased housing provision at New Monks Farm (600 dwellings for option B compared to 450 dwellings for options A1, A2 and A3) could result in the provision of less community facilities or employment floorspace.
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development (please see the Sequential and Exception Test for more information on flood risk)	
Red -	Option A1 This option proposes development at the three following sites: New Monks Farm – The majority of this site is within Flood Zone 3a with parts in Flood Zone 1 and 2. There are also potential groundwater and surface water issues on the site but these affect the majority of the district. However, the location of development at this site is not consistent with this objective. Sompting Fringe – the vast majority of the site is within Flood Zone 1 and its allocation is therefore consistent with this objective. There are groundwater and surface water issues on the site but these affect the majority of the district. Hasler – This site is located within Flood Zone 3a and 3b and could only be developed if the Adur Tidal Walls Scheme is implemented as this would change the 3b designation to 3a. There are also potentially significant groundwater and surface water issues on the site. Sequentially, this is the most unfavourable site in terms of flood risk and would not be consistent with this objective. However, development at the Hasler site would provide opportunities to improve the sewers

	<p>in the area, many of which have collapsed. This could improve sewer flooding in the area although the extent of the problem is not clear at this stage.</p> <p>Flood mitigation measures would be incorporated into development on these sites where necessary and a flood risk assessment would have to be undertaken to show that the development would be safe and would not increase flood risk elsewhere. Nevertheless, given that this option proposes a significant amount of development in areas with a high probability of flooding, it cannot be considered to be consistent with this objective.</p>
Red --	<p>Option A2</p> <p>This option proposes development at the two following sites:</p> <p>New Monks Farm – The majority of this site is within Flood Zone 3a with parts in Flood Zone 1 and 2. There are also potential groundwater and surface water issues on the site but these affect the majority of the district. However, the location of development at this site is not consistent with this objective.</p> <p>Hasler – This site is located within Flood Zone 3a and 3b and could only be developed if the Adur Tidal Walls Scheme is implemented as this would change the 3b designation to 3a. There are also potentially significant groundwater and surface water issues on the site. Sequentially, this is the most unfavourable site in terms of flood risk and would not be consistent with this objective. However, development at the Hasler site would provide opportunities to improve the sewers in the area, many of which have collapsed. This could improve sewer flooding in the area although the extent of the problem is not clear at this stage.</p> <p>This option proposes a greater level of development at the Hasler site than Option A1.</p> <p>Flood mitigation measures would be incorporated into any development on these sites and a flood risk assessment would have to be undertaken to show that the development would be safe and would not increase flood risk elsewhere.</p> <p>Nevertheless, given that both greenfield sites in this option have a high probability of flooding, this option is considered to significantly conflict with this objective.</p>
Amber	<p>Option A3</p> <p>This option proposes development at the two following sites:</p> <p>New Monks Farm – The majority of this site is within Flood Zone 3a with parts in Flood Zone 1 and 2. There are also potential groundwater and surface water issues on the site but these affect the majority of the district. However, the location of development at this site is not consistent with this objective.</p> <p>Sompting Fringe – the vast majority of the site is within Flood Zone 1 and its allocation is therefore consistent with this objective. There are potential groundwater and surface water issues on the site but these affect the majority of the district.</p> <p>Flood mitigation measures would be incorporated into any development on these sites and a flood risk assessment would have to be undertaken to show that the development would be safe and would not increase flood risk elsewhere.</p> <p>Of the four options, this option is considered to be the most acceptable in respect of flooding as it locates more development within Flood Zone 1 than the other options. However, a significant amount of development would still be located within an area with a high probability of flooding so there is potential for conflict with this objective.</p>
Red --	<p>Option B</p> <p>This option proposes development at the four following sites:</p> <p>New Monks Farm – The majority of this site is within Flood Zone 3a with parts in Flood Zone 1 and 2. There are potential groundwater and surface water issues on the site but these affect the majority of the district. However, the location of development at this site is not consistent with this objective. Additionally, this option proposes more housing on the site than the other options which</p>

	<p>exacerbates this issue.</p> <p>Sompting Fringe – the vast majority of the site is within Flood Zone 1 and its allocation is therefore consistent with this objective. There are groundwater and surface water issues on the site but these affect the majority of the district.</p> <p>Sompting North – this site is entirely within Flood Zone 1 and its allocation is therefore consistent with this objective. There are some surface water issues but no significant groundwater issues.</p> <p>Hasler – This site is located within Flood Zone 3a and 3b and could only be developed if the Adur Tidal Walls Scheme is implemented as this would change the 3b designation to 3a. There are also potentially significant groundwater and surface water issues on the site. Sequentially, this is the most unfavourable site in terms of flood risk and would not be consistent with this objective. However, development at the Hasler site would provide opportunities to improve the sewers in the area, many of which have collapsed. This could improve sewer flooding in the area although the extent of the problem is not clear at this stage.</p> <p>This option proposes more housing on the site than the other options which exacerbates this issue.</p> <p>Flood mitigation measures would be incorporated into any development on these sites and a flood risk assessment would have to be undertaken to show that the development would be safe and would not increase flood risk elsewhere.</p> <p>Although this option proposes more housing in flood zone 1 than the other options, it also proposes more housing in areas with a high probability of flooding. Therefore this option significantly conflicts with this objective.</p>
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres	
Green +	<p>Option A1</p> <p>This option proposes a significant amount of new residential development which would be likely to contribute to the vitality and viability of Lancing and Shoreham town centre through helping to retain existing residents as well as accommodating in-migration in the district which would result in more people using the town centres. However, it is likely that a significant number of residents of any new development in Sompting would shop in Worthing as well given its proximity.</p> <p>Community facilities are proposed at New Monks Farm which would contribute to this objective.</p> <p>More houses are likely to result in more pressure on key facilities and services but development can make financial contributions towards the provision of new facilities to meet additional need created by that development.</p>
Green +	<p>Option A2</p> <p>This option proposes a significant amount of new residential development which would be likely to contribute to the vitality and viability of Lancing and Shoreham town centre through helping to retain existing residents as well as accommodating in-migration in the district which would result in more people using the town centres.</p> <p>Community facilities are proposed at New Monks Farm which would contribute to this objective.</p> <p>More houses are likely to result in more pressure on key facilities and services but development can make financial contributions towards the provision of new facilities to meet additional need created by that development.</p>
Green +	<p>Option A3</p> <p>This option proposes a significant amount of new residential development which would be likely to contribute to the vitality and viability of Lancing and Shoreham town centre through helping to retain existing residents as well as accommodating in-migration in the district which would result in more people using the town centres. However, it is likely that a significant number of residents of any new</p>

	<p>development in Sompting would shop in Worthing as well as town centres within the district given its proximity.</p> <p>Community facilities are proposed at New Monks Farm which would contribute to this objective.</p> <p>More houses are likely to result in more pressure on key facilities and services but development can make financial contributions towards the provision of new facilities to meet additional need created by that development.</p>
Green +	<p>Option B</p> <p>This option proposes a significant amount of new residential development which would be likely to contribute to the vitality and viability of Lancing and Shoreham town centre through helping to retain existing residents as well as accommodating in-migration in the district which would result in more people using the town centres. However, it is likely that a significant number of residents of any new development in Sompting would shop in Worthing as well as town centres within the district given its proximity.</p> <p>Community facilities are proposed at New Monks Farm which would contribute to this objective.</p> <p>More houses are likely to result in more pressure on key facilities and services but development can make financial contributions towards the provision of new facilities to meet additional need created by that development.</p>
19. Create places and spaces and buildings that work well, wear well and look good	
	<p>Option A1</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option A2</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option A3</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option B</p> <p>This objective is addressed by other policies within the Plan.</p>
20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs	
	<p>Option A1</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option A2</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option A3</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option B</p> <p>This objective is addressed by other policies within the Plan.</p>
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy	
	<p>Option A1</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option A2</p> <p>This objective is addressed by other policies within the Plan.</p>
	<p>Option A3</p> <p>This objective is addressed by other policies within the Plan.</p>

	<p>Option B</p> <p>This objective is addressed by other policies within the Plan.</p>
Conclusion	
Amber	<p>Options A1, A2 & A3</p> <p>Overall, these options are relatively similar in relation to their impacts on the Sustainability Objectives. Option A3 is preferable with regard to minimizing flood risk but is likely to have a greater impact on the historic character of the district due to the higher amount of land allocated at Sompting fringe. Option A2 is the least preferable option (not including option B) regarding flood risk due to the higher amount of land allocated at the Hasler Estate. Each option scores more favourably in relation to the social and economic objectives than the environmental objectives, mainly because they involve a significant amount of development on greenfield land (up to 1000 dwellings, up to 10,000sqm of employment floorspace, and other associated uses and infrastructure).</p>
Red-	<p>Option B</p> <p>This option has the most negative impacts in relation to the Sustainability Objectives. There are a number of significant negative impacts in relation to the countryside, pollution and flood risk, and generally this option scores negatively in relation to the environmental objectives. However, there are a number of social and economic sustainability benefits and, comparatively, this option scores particularly positively in relation to meeting housing needs. However, it is clear from this Sustainability Appraisal that these benefits, to some degree, come at the expense of the environment.</p>

APPENDIX V – SHOREHAM AIRPORT ALTERNATIVES APPRAISAL

Introduction

As discussed in Chapter 11 (within Part 2) above, the following two alternatives were subjected to appraisal at an 'interim' plan-making / SA stage, i.e. prior to the Proposed Submission Plan being finalised:

- 1) Development in the north east corner only
- 2) Development in the north east and north west corner

The aim of this appendix is to present appraisal findings in full.

Methodology

See Appendix IV, above.

Appraisal findings: Shoreham Airport Development Quantum alternatives

	Option 1 – Development in the north east corner only	Option 2 – Development in the north east and north west corner
1. Increase energy efficiency and encourage the use of renewable energy sources	This objective is addressed by policies within the Plan.	This objective is addressed by policies within the Plan.
2. Protect and enhance water quality and encourage the sustainable use of water	Amber The proposed indicative allocation at Shoreham Airport is located adjacent to the River Adur SSSI. Under the Water Framework Directive, the River Adur is classified as a 'Transitional Water Body' of 'moderate' quality with the aim of no deterioration of that quality (as a minimum). Potential impacts on the quality of the waterbody would need to be addressed at the design stage but it should be noted that there is potential for conflict with this objective as a result of new development immediately so close to the SSSI. Any potential impacts would need to be mitigated.	Amber The proposed indicative allocation at Shoreham Airport is located adjacent to the River Adur SSSI. Under the Water Framework Directive, the River Adur is classified as a 'Transitional Water Body' of 'moderate' quality with the aim of no deterioration of that quality (as a minimum). Potential impacts on the quality of the waterbody would need to be addressed at the design stage but it should be noted that there is potential for conflict with this objective as a result of new development immediately adjacent to the SSSI. Additionally, development proposed in the north west corner of the airport is located adjacent to watercourses which run to the River Adur. Any negative impacts on the watercourses could have a negative impact on the SSSI. Any potential impacts would need to be mitigated.
3. Improve land use efficiency by encouraging the re-use of previously developed land,	Green Shoreham Airport is defined as previously developed land and	Green Shoreham Airport is defined as previously developed land and

buildings and materials	development on the site therefore supports this objective.	development on the site therefore supports this objective.
4. Conserve, protect and enhance biodiversity	Amber This option proposes development adjacent to the Adur Estuary SSSI which means there is some potential for an impact on the biodiversity of the area if not mitigated properly.	Amber This option proposes development adjacent to the Adur Estuary SSSI which means there is some potential for an impact on the biodiversity of the area if not mitigated properly. Additionally, development proposed in the north west corner of the airport is located adjacent to watercourses which run to the River Adur. Any negative impacts on the watercourses could have a negative impact on the SSSI.
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes	Amber This option proposes development within the Local Green Gap which is part of the historic character of Adur. This area also provides a number of key views to/from the Downs including Lancing College (Grade I Listed), the Terminal Building (Grade II* Listed), Old Shoreham Bridge (Grade II* Listed) and St Nicholas Church (Grade I Listed). Therefore there is significant potential for conflict with this objective if development at the airport is not carefully sited and designed.	Red - This option proposes a significant amount of development within the Local Green Gap which is part of the historic character of Adur. The proposed development in the north west corner is quite centrally located within the gap, albeit close to its northern edge. This area also provides a number of key views to/from the Downs including Lancing College (Grade I Listed), the Terminal Building (Grade II* Listed), Old Shoreham Bridge (Grade II* Listed) and St Nicholas Church (Grade I Listed). Therefore there is significant potential for conflict with this objective if development at the airport is not carefully sited and designed. It is considered that any siting of development in the north west corner of the airport would conflict with this objective due to its impact on the gap. The proposed north west development could also have a potential impact on the Trainer Dome Scheduled Ancient Monument as it would be located immediately adjacent. However, more evidence is required regarding this impact.
6. Protect and enhance the countryside	Amber This option proposes	Red - - This option proposes a

	<p>development within the Local Green Gap. This area also provides a number of key views to/from the Downs and is visible from a number of key viewpoints within the Downs. The Landscape and Ecology Survey identified Shoreham Airport as being of a high overall landscape quality. Therefore there is significant potential for conflict with this objective if development at the airport is not carefully sited and designed.</p>	<p>significant amount of development within the Local Green Gap. The proposed development in the north west corner is quite centrally located within the gap, albeit close to its northern edge. This area also provides a number of key views to/from the Downs and is visible from a number of key viewpoints within the Downs. The Landscape and Ecology Survey identified Shoreham Airport as being of a high overall landscape quality. Therefore there is significant potential for conflict with this objective if development at the airport is not carefully sited and designed. It is considered that any siting of development in the north west corner of the airport would conflict with this objective due to its impact on the gap and views from the National Park. The Landscape and Ecology Survey confirms that development in this location would have a significant adverse impact on the landscape sensitivity of the site due to a fundamental change to the 'greenness, smoothness and openness' of the airport.</p>
7. Protect and enhance public open space / green infrastructure and accessibility to it	<p>Amber</p> <p>The River Adur SSSI is a key piece of green infrastructure and there is potential for new development at the airport to impact on this area visually and in terms of potential pollution impacts due to the close proximity of development to the airport. Such impacts would need to be mitigated.</p>	<p>Amber</p> <p>The River Adur SSSI is a key piece of green infrastructure and there is potential for new development at the airport to impact on this area visually and in terms of potential pollution impacts due to the close proximity of development to the airport. Such impacts would need to be mitigated.</p>
8. To reduce pollution and the risk of pollution to air, land and water	<p>Amber</p> <p>New employment development at the airport is likely to result in increased car movements which could have a negative impact on air pollution. This could be mitigated to some extent through sustainable transport improvements to/from the airport.</p> <p>The proposed indicative</p>	<p>Amber</p> <p>New employment development at the airport is likely to result in increased car movements which could have a negative impact on air pollution. This could be mitigated to some extent through sustainable transport improvements to/from the airport. Option 2 is likely to result in a greater increase in car movements and so is likely</p>

	allocation at Shoreham Airport is located adjacent to the River Adur SSSI. Under the Water Framework Directive, the River Adur is classified as a 'Transitional Water Body' of 'moderate' quality with the aim of no deterioration of that quality (as a minimum). Potential impacts on the quality of the waterbody would need to be addressed at the design stage but it should be noted that there is potential for conflict with this objective as a result of new development immediately adjacent to the SSSI.	to have a greater negative impact on this objective although there is no evidence at this stage to suggest that such a level of development is unacceptable in respect of pollution. The proposed indicative allocation at Shoreham Airport is located adjacent to the River Adur SSSI. Under the Water Framework Directive, the River Adur is classified as a 'Transitional Water Body' of 'moderate' quality with the aim of no deterioration of that quality (as a minimum). Potential impacts on the quality of the waterbody would need to be addressed at the design stage but it should be noted that there is potential for conflict with this objective as a result of new development immediately adjacent to the SSSI.
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events	This objective is dealt with by policies in the Local Plan.	This objective is dealt with by policies in the Local Plan.
10. To improve health and wellbeing and reduce inequalities in health	This objective is dealt with by policies in the Local Plan.	This objective is dealt with by policies in the Local Plan.
11. To reduce crime, the fear of crime and antisocial behaviour	This objective is dealt with by policies in the Local Plan.	This objective is dealt with by policies in the Local Plan.
12. Promote sustainable transport and reduce the use of the private car	This objective is dealt with by policies in the Local Plan.	This objective is dealt with by policies in the Local Plan.
13. To reduce poverty, social exclusion and social inequalities	Green + This option proposes approximately 15,000sqm of employment floorspace which would provide a significant number of new job opportunities in the district and would therefore help contribute to this objective.	Green ++ This option proposes approximately 25,000sqm of employment floorspace, significantly more than option 1, which would provide a significant number of new job opportunities in the district and would therefore help contribute to this objective.
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing	This objective is dealt with by policies in the Local Plan.	This objective is dealt with by policies in the Local Plan.
15. To create and sustain vibrant communities which recognize the needs and	This objective is dealt with by policies in the Local Plan.	This objective is dealt with by policies in the Local Plan.

contribution of all individuals		
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy	<p>Green +</p> <p>This policy would contribute to this objective by providing approximately 15,000sqm of employment floorspace as well as contributing to supporting infrastructure including a new access from the A27 serving both the Airport and New Monks Farm.</p>	<p>Green ++</p> <p>This policy would significantly contribute to this objective by providing approximately 25,000sqm of employment floorspace as well as contributing to supporting infrastructure including a new access from the A27 serving both the Airport and New Monks Farm.</p>
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development	<p>Amber</p> <p>The whole of Shoreham Airport is currently located within Flood Zone 3b (functional floodplain). However, no development can take place within the allocated area until the Shoreham Tidal Walls are constructed as this would change the Flood Zone designation from 3b to 3a (high probability). It should also be noted that employment development is defined as 'less vulnerable' in the NPPF.</p> <p>Nevertheless, it is considered that a significant amount of employment development within an area designated Flood Zone 3a is not entirely consistent with this objective. Please see the Sequential and Exception Test for more details on flood risk.</p>	<p>Red-</p> <p>The whole of Shoreham Airport is currently located within Flood Zone 3b (functional floodplain). However, no development can take place within the allocated area until the Shoreham Tidal Walls are constructed as this would change the Flood Zone designation from 3b to 3a (high probability). It should also be noted that employment development is defined as 'less vulnerable' in the NPPF.</p> <p>Nevertheless, this option proposes more development in an area at risk of flooding than option A and it is considered that a significant amount of employment development within an area designated Flood Zone 3a is not consistent with this objective. Please see the Sequential and Exception Test for more details on flood risk.</p>
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres	<p>Green +</p> <p>New employment development would be likely to benefit existing centres, particularly Shoreham town centre which is relatively close to the Airport, as the more people there are working in the area, the more they are likely to visit the town centres. However, this would rely on improved sustainable transport links to Shoreham town centre.</p>	<p>Green +</p> <p>New employment development would be likely to benefit existing centres, particularly Shoreham town centre which is relatively close to the Airport, as the more people there are working in the area, the more they are likely to visit the town centres. However, this would rely on improved sustainable transport links to Shoreham town centre. The benefit to the town centre of option 2 over Option 1 is likely to be negligible.</p>
19. Create places and spaces and buildings that work well, wear well and look good	This objective is addressed by policies in the Local Plan.	This objective is addressed by policies in the Local Plan.

20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs	This objective is addressed by policies in the Local Plan.	This objective is addressed by policies in the Local Plan.
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy	This objective is addressed by policies in the Local Plan.	This objective is addressed by policies in the Local Plan.
Conclusion	Both options have a number of positive benefits in respect of the economic and social objectives. Option 2 scores particularly well in this regard. Neither option scores particularly well in respect of the environmental objectives but Option 2 would clearly have more significant environmental impacts than Option 1, particularly with regard to the historic environment, the countryside and flood risk. On balance, it is considered that Option 1 performs better as it would still have a number of social and economic benefits but without such a significant impact on the environment.	

APPENDIX VI – APPRAISAL OF AMENDMENTS TO NEW MONKS FARM ALLOCATION WITHIN THE PROPOSED SUBMISSION ADUR LOCAL PLAN 2014

Introduction

As discussed in Chapter 12 above, the amendments to the New Monks Farm allocation in the Proposed Submission Plan 2014 were subjected to appraisal subsequent to the Reg 18 consultation document of December 2015 that proposed the amendments but prior to the Proposed Submission Plan (2016) being finalised.

The aim of this appendix is to present appraisal findings in full.

Methodology

See Appendix IV

Appraisal Findings

1. The number of potential homes at New Monks Farm being stated as 600 homes rather than a range of 450-600 homes

	Option 1 - Range of 450-600 new dwellings at New Monks Farm	Option 2 - 600 new dwellings at New Monks Farm
1. Increase energy efficiency and encourage the use of renewable energy sources	N/A	N/A
2. Protect and enhance water quality and encourage the sustainable use of water	N/A	N/A
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials	N/A	N/A
4. Conserve, protect and enhance biodiversity	Amber This option allows for a range of housing and the lower end of the range (450 dwellings) would result in a less dense development which would be likely to have less impact on the existing biodiversity and also potentially provide more opportunities to enhance biodiversity through greater green space/green infrastructure provision.	Amber This option provides less flexibility and would result in a potentially denser development. As a result this option has a greater potential for impact on existing biodiversity on the site and would potentially provide less opportunities to enhance biodiversity than the lower end of Option 1 (450 dwellings) through green space/green infrastructure provision.

	There are no areas designated for their biodiversity importance on the site.	However, there are no areas designated for their biodiversity importance on the site and the overall impacts on biodiversity are unlikely to be unacceptable.
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes	Amber Although New Monks Farm is not within or adjacent to a Conservation Area, it is within a Local Green Gap which is part of the historic landscape of Adur. This option allows for a range of housing and the lower end of the range (450 dwellings) is likely to have less potential impact on the landscape than the higher end of the range (600 dwellings) as the density would be lower with more opportunities for green space/green infrastructure which could help soften the impact. However, the proposal would still have a significant impact on the local green gap.	Amber Although New Monks Farm is not within or adjacent to a Conservation Area, it is within a Local Green Gap which is part of the historic landscape of Adur. This option provides less flexibility and 600 homes would be likely to have a greater impact on the landscape than the lower end of the range of option 1 (450 dwellings) as the density would be higher with less opportunities for green space/green infrastructure to soften the impact. However, the difference between Options 1 and 2 is unlikely to be significant.
6. Protect and enhance the countryside	Amber New Monks Farm is within the Local Green Gap which is also designated countryside. This option allows for a range of housing and the lower end of the range (450 dwellings) is likely to have less potential impact on the countryside than the higher end of the range (600 dwellings) as the density would be lower with more opportunities for green space/green infrastructure which could help soften the impact.	Amber New Monks Farm is within the Local Green Gap which is also designated countryside. This option provides less flexibility and 600 homes would be likely to have a greater impact on the countryside than the lower end of the range of option 1 (450 dwellings) as the density would be higher with less opportunities for green space/green infrastructure to soften the impact. 600 homes is also likely to be more visible from key views within the National Park than the lower end of option 1 (450 homes). However, the overall difference between Options 1 and 2 is unlikely to be significant.
7. Protect and enhance public open space / green infrastructure and accessibility to it	Amber This option allows for a range of housing and the lower end of the range (450 dwellings) would result in a less dense development than the upper end of the range (600 homes) which would have the potential to provide more green space/green infrastructure provision.	Amber This option provides less flexibility and would result in a potentially denser development. As a result this option would potentially provide less opportunities for green space/green infrastructure than the lower end of Option 1 (450 dwellings). However, the overall difference between Options 1 and 2 is unlikely to be significant.

8. To reduce pollution and the risk of pollution to air, land and water	<p>Amber</p> <p>This option allows for a range of housing and the lower end of the range is likely to result in less car movements than the higher end of the range with more potential for air pollution in the area. However, the difference in air pollution between 450 dwellings and 600 dwellings is likely to be negligible.</p>	<p>Amber</p> <p>This option provides less flexibility and is likely to result in more car movements than the lower end of option 1 (450 dwellings) which is likely to result in more car movements with more potential for air pollution in the area. However, the difference in air pollution between 450 dwellings and 600 dwellings is likely to be negligible.</p>
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events	N/A	N/A
10. To improve health and wellbeing and reduce inequalities in health	<p>Green +</p> <p>This option allows for a range of housing and the lower end of the range (450 dwellings) would result in a less dense development which would have the potential to provide more green space/green infrastructure provision which would benefit health.</p> <p>Both option 1 and option 2 provide a country park.</p> <p>The lower end of this option would also result in less dwellings being built in an area at risk of flooding than option 2.</p>	<p>Amber</p> <p>This option provides less flexibility and would result in a potentially denser development. As a result this option would potentially provide less opportunities to provide green space / green infrastructure (which are beneficial for health) than the lower end of Option 1 (450 dwellings).</p> <p>Both option 1 and option 2 provide a country park.</p> <p>This option would result in more dwellings being built in an area at risk of flooding than the lower range of Option 1 which has potential health impacts. However, any policy for the site will ensure that development is designed to be safe from flood risk.</p>
11. To reduce crime, the fear of crime and antisocial behaviour	N/A	N/A
12. Promote sustainable transport and reduce the use of the private car	N/A	N/A
13. To reduce poverty, social exclusion and social inequalities	<p>Green +</p> <p>Option 1 provides 450-600 homes (30% of which are to be affordable). This level of affordable homes would help</p>	<p>Green +</p> <p>Option 2 provides 600 homes (30% of which are to be affordable). This option would provide more houses than the</p>

	contribute to this objective.	lower range of Option 1 (450 dwellings). This level of affordable homes would help contribute to this objective.
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing	Green + Option 1 provides 450-600 homes (30% of which are to be affordable). This level of affordable homes would help contribute to this objective.	Green ++ Option 2 provides 600 homes (30% of which are to be affordable). This option would provide more houses than the lower range of Option 1 (450 dwellings). This level of affordable homes would help contribute to this objective. It should also be noted that the more fixed number of 600 dwellings has the potential to make the scheme more viable and give developers more certainty, thereby making it more likely that housing will be delivered.
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals	N/A	N/A
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy	Green + 450-600 homes would benefit local business by providing an additional labour force in the area. Additionally, in the short term, the construction phase of the development would provide a number of jobs.	Green + 600 homes would benefit local businesses by providing an additional labour force in the area. Additionally, in the short term, the construction phase of the development would provide a number of jobs.
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development	Red - Much of this site is located within flood zone 3a and there are also surface water issues and the potential for groundwater flooding. This option allows for a range of housing and the lower end of the range (450 dwellings) would obviously result in less houses in an area at risk of flooding than the top end of the range.	Red - - Much of this site is located within flood zone 3a and there are also surface water issues and the potential for groundwater flooding. This option provides less flexibility than option 1 and would result in more houses being built in an area at risk of flooding than the lower end of option 1 (450 dwellings).
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres	Green + New housing development at New Monks Farm is likely to improve the vitality and viability of adjacent town centres, particularly Lancing town centre, through increased footfall.	Green ++ New housing development at New Monks Farm is likely to improve the vitality and viability of adjacent town centres, particularly Lancing town centre, through increased footfall. This option is likely to contribute

		more significantly to this objective than the lower end of the range (450 dwellings) for option 1.
19. Create places and spaces and buildings that work well, wear well and look good	N/A	N/A
20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs	N/A	N/A
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy	N/A	N/A
Conclusion	<p>Whilst the Sustainability Appraisal recognises that Option 1 (450-600 dwellings) is likely to make a slightly more positive contribution to the environmental objectives as it provides more flexibility and allows for a minimum of 450 dwellings to be provided, the scores for the two options in relation to the environmental objectives are generally similar. Any additional impacts of Option 2 are unlikely to be major and could only be determined with any accuracy at the detailed design stage. Option 2 (600 dwellings) scores more positively against economic and some social objectives because it is less flexible in the amount of housing it provides and is likely to make any scheme slightly more viable and give developers more certainty. It should be noted that if the top end of the range for Option 1 is provided, the positive and negative impacts of this option would be identical to Option 2. Additionally, another point to note is that the Option 2 figure is still more of a guide than a completely fixed figure as housing numbers may change slightly once the detail is worked up at the planning application stage.</p>	

2. The indicative location of the proposed roundabout is moved eastwards to a more central location between the airport and New Monks Farm site.

The central roundabout location has been assessed against the westerly New Monks Farm roundabout option included in the Proposed Submission Adur Local Plan 2014 and the easterly Shoreham Airport/Sussex Pad roundabout option included as a contingency in the Proposed Submission Adur Local Plan 2014.

	Option 1 - Shoreham Airport/Sussex Pad Roundabout Option	Option 2 - New Monks Farm Roundabout Option	Option 3 Central Roundabout Option
1. Increase energy efficiency and encourage the use of renewable energy sources	N/A	N/A	N/A
2. Protect and enhance water quality and encourage the sustainable use of water	N/A	N/A	N/A
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials	N/A	N/A	N/A
4. Conserve, protect and enhance biodiversity	Amber The roundabout would not be located immediately adjacent to any designated sites of ecological importance. There is likely to be some biodiversity of local interest in the surrounding area but any impacts could be mitigated and this is not considered to be a significant issue.	Amber The roundabout would not be located immediately adjacent to any designated sites of ecological importance. There is likely to be some biodiversity of local interest in the New Monks Farm area but any impacts could be mitigated and this is not considered to be a significant issue.	Amber The roundabout would not be located immediately adjacent to any designated sites of ecological importance. There is likely to be some biodiversity of local interest in the New Monks Farm area but any impacts could be mitigated and this is not considered to be a significant issue.
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes	Red - The roundabout for this option is proposed within the Shoreham-Lancing Local Green Gap which is part of the historic character of Adur. Therefore there is some potential for conflict with this objective. Additionally, the	Amber The roundabout for this option is proposed within the Shoreham-Lancing Local Green Gap which is part of the historic character of Adur. Therefore there is some potential for conflict with this objective.	Red - - The roundabout for this option is proposed within the Shoreham-Lancing Local Green Gap which is part of the historic character of Adur. Therefore there is some potential for conflict with this objective. Additionally, the roundabout would be in very close

	roundabout would be in close proximity to the Trainer Dome Scheduled Ancient Monument so the setting of the dome could be affected.		proximity to the Trainer Dome Scheduled Ancient Monument so the setting of the dome could be affected.
6. Protect and enhance the countryside	<p>Red - -</p> <p>The roundabout for this option is proposed within the Shoreham-Lancing Local Green Gap. This area is also visible from key viewpoints within the Downs.</p> <p>The Adur Landscape and Ecology Survey identifies Shoreham Airport as being of a high overall landscape quality. Landscape work undertaken on behalf of the Council in 2013 regarding Shoreham Airport confirms that development in this location would have a significant adverse impact on the landscape sensitivity of the site due to a fundamental change to the 'greenness, smoothness and openness' of the airport.</p> <p>Therefore there is significant potential for conflict with this objective.</p>	<p>Amber</p> <p>The roundabout for this option is proposed within the Shoreham-Lancing Local Green Gap. This area is also visible from key viewpoints within the Downs</p> <p>The Adur Landscape and Ecology Survey identifies the area of New Monks Farm where the roundabout would be located as being of medium overall landscape quality.</p> <p>However, if the roundabout is provided at this location, this will result in the loss of pedestrian/cycle access to the South Downs National Park at the Sussex Pad junction and some new access, most likely in the form of a bridge, would need to be located here which could impact on the landscape.</p> <p>Therefore there is potential for conflict with this objective.</p>	<p>Red -</p> <p>The roundabout for this option is proposed within the Shoreham-Lancing Local Green Gap. This area is also visible from key viewpoints within the Downs.</p> <p>The roundabout straddles the boundary between the New Monks Farm area and Shoreham Airport. The Adur Landscape and Ecology Survey identifies the New Monks Farm area as being of medium overall landscape quality and Shoreham Airport as being of high overall landscape quality.</p> <p>Therefore there is significant potential for conflict with this objective.</p> <p>If the roundabout is provided in this location, this will result in the loss of pedestrian/cycle access at the Sussex Pad junction and would mean that pedestrians and cyclists would have to travel further west to cross the A27.</p>
7. Protect and enhance public open space / green infrastructure and accessibility to it	<p>Green</p> <p>A new roundabout at the Sussex Pad junction would be required to provide pedestrian and cycle access to the National Park as is currently the case.</p>	<p>Amber</p> <p>A new roundabout at this location would require a reconfigured access at Sussex Pad which would result in a loss of the existing pedestrian/cycle access at Sussex Pad to the South Downs National Park. This would need to be</p>	<p>Amber</p> <p>A new roundabout at this location would result in the closure of the existing access at Sussex Pad so cyclists and pedestrian would have to travel further west to cross at the new roundabout.</p>

		replaced, possibly by the construction of a bridge at Sussex Pad. A new roundabout at New Monks Farm could provide opportunities to improve access to the National Park in that area.	
8. To reduce pollution and the risk of pollution to air, land and water	N/A	N/A	N/A
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events	N/A	N/A	N/A
10. To improve health and wellbeing and reduce inequalities in health	N/A	N/A	N/A
11. To reduce crime, the fear of crime and antisocial behaviour	N/A	N/A	N/A
12. Promote sustainable transport and reduce the use of the private car	N/A	N/A	N/A
13. To reduce poverty, social exclusion and social inequalities	N/A	N/A	N/A
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing	Green+ An improved access from the A27 is essential for development to come forward at New Monks Farm and Shoreham Airport. A new roundabout at this location would therefore support this objective.	Green + An improved access from the A27 is essential for development to come forward at New Monks Farm and Shoreham Airport. A new roundabout at this location would therefore support this objective.	Green ++ An improved access from the A27 is essential for development to come forward at New Monks Farm and Shoreham Airport. A new roundabout at this location would therefore support this objective. Importantly, this central roundabout option is agreed upon by both the promoters of development at New Monks Farm and promoters of development at Shoreham Airport. This option is therefore the most deliverable and

			most likely to bring forward housing.
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals	N/A	N/A	N/A
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy	<p>Green +</p> <p>An improved access from the A27 is essential for development to come forward at New Monks Farm and Shoreham Airport. 15,000sqm of employment-generating floorspace is proposed at Shoreham Airport. A new roundabout at this location would therefore support this objective.</p>	<p>Green +</p> <p>An improved access from the A27 is essential for development to come forward at New Monks Farm and Shoreham Airport. 10,000sqm of employment-generating floorspace is proposed at New Monks Farm. A new roundabout at this location would therefore support this objective.</p> <p>A new roundabout in this location is likely to add additional time onto the journeys of employees/visitors travelling east from Shoreham Airport, Ricardo and Northbrook College. Though this may result in some inconvenience there is no evidence to suggest that this issue would conflict with this objective.</p>	<p>Green +</p> <p>An improved access from the A27 is essential for development to come forward at New Monks Farm and Shoreham Airport. 10,000sqm of employment-generating floorspace is proposed at New Monks Farm and 15,000sqm of employment-generating floorspace is proposed at the Airport. A new roundabout at this location would support this objective.</p> <p>Importantly, this central roundabout option is agreed upon by both the promoters of development at New Monks Farm and promoters of development at Shoreham Airport. This option is therefore the most deliverable and most likely to bring forward new employment.</p>
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development	N/A	N/A	N/A
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres	N/A	N/A	N/A
19. Create places and spaces and buildings that work well, wear well and look good	N/A	N/A	N/A

20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs	N/A	N/A	N/A
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy	N/A	N/A	N/A
Conclusion	The Sustainability Appraisal shows that the general benefits and disadvantages of the roundabouts are largely similar. One of the main differences at this stage is the impact on the landscape and historic environment. Shoreham Airport is the most sensitive location for a new roundabout and, as a result, the Shoreham Airport roundabout and the central roundabout option has more scope for conflict with the countryside and heritage objectives than the New Monks Farm roundabout. However, the central roundabout location is the only option that promoters of New Monks Farm and promoters of Shoreham Airport actually agree on so this is the most deliverable option and therefore scores slightly more positively on the housing and economic objectives.		

- 3) The existing Withy Patch travellers site is proposed to be relocated westwards with a limited expansion to meet identified needs and brought within the New Monks Farm site allocation boundary.

	Option 1 – Withy Patch gypsy and travellers site remains in its existing location and outside the New Monks Farm site allocation boundary as shown in the Proposed Submission Adur Local Plan 2014	Option 2 – Withy Patch gypsy and travellers site is relocated westwards with a limited expansion to meet identified needs and is included within the New Monks Farm site allocation boundary.
1. Increase energy efficiency and encourage the use of renewable energy sources	N/A	N/A
2. Protect and enhance water quality and encourage the sustainable use of water	N/A	N/A
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials	N/A	N/A
4. Conserve, protect and enhance	No impact	Negligible impact

biodiversity		
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes	No impact	No impact
6. Protect and enhance the countryside	No impact	Negligible impact
7. Protect and enhance public open space / green infrastructure and accessibility to it	N/A	N/A
8. To reduce pollution and the risk of pollution to air, land and water	N/A	N/A
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events	Amber This option retains the current situation and doesn't provide an obvious opportunity to improve flood risk for the Withy Patch traveller and gypsy site. The site is currently within flood zone 3a which is generally unsuitable for mobile homes.	Green The relocation of the Withy Patch site provides the opportunity to bring the traveller and gypsy site out of flood zone 3a through raising the land at the new site.
10. To improve health and wellbeing and reduce inequalities in health	Amber This option doesn't provide an obvious opportunity to improve flood risk for the Withy Patch traveller and gypsy site which may be detrimental to health in a particularly big flood event.	Green This option provides the opportunity to improve flood risk for the travellers and gypsies at Withy Patch which is likely to be beneficial to both physical and mental health.
11. To reduce crime, the fear of crime and antisocial behaviour	N/A	N/A
12. Promote sustainable transport and reduce the use of the private car	N/A	N/A
13. To reduce poverty, social exclusion and social inequalities	Amber This option doesn't provide any obvious opportunities for expansion of the site which, while not necessarily worsening the existing situation, would not contribute positively to this objective.	Green This option provides an opportunity to expand the site with a long term aim of providing more pitches on the site to meet the needs of expanding families at Withy Patch. This would help contribute to this objective.
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing	Amber This option doesn't provide any obvious opportunities for expansion of the site which, while not necessarily worsening the existing situation, would not	Green This option provides an opportunity to expand the site with a long term aim of providing more pitches on the site to meet the needs of expanding families at

	contribute positively to this objective.	<p>Withy Patch. This would help contribute to this objectives.</p> <p>An additional benefit of this option is that the relocation of the existing traveller and gypsy site would allow a new central roundabout (located on the boundary of Shoreham Airport and New Monks Farm) to be delivered, serving development at Shoreham Airport and New Monks Farm. This roundabout location is agreed by both promoters of development at New Monks Farm and Shoreham Airport which significantly helps with the delivery of housing development.</p>
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals	<p>Amber</p> <p>This option doesn't provide any obvious opportunities for expansion of the site which, while not necessarily worsening the existing situation, would not contribute positively to this objective.</p>	<p>Green</p> <p>This option provides an opportunity to expand the site with a long term aim of providing more pitches on the site to meet the needs of expanding families at Withy Patch. This would help contribute to this objective.</p>
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy	N/A	N/A
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development	<p>Amber</p> <p>This option retains the current situation and doesn't provide an obvious opportunity to improve flood risk for the Withy Patch traveller and gypsy site. The site is currently within flood zone 3a (high probability) which is generally unsuitable for mobile homes.</p>	<p>Green</p> <p>The relocation of the Withy Patch site provides the opportunity to bring the traveller and gypsy site out of flood zone 3a (high probability) through raising the land at the new site.</p>
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres	N/A	N/A
19. Create places and spaces and buildings that work well, wear well and look good	N/A	N/A

20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs	N/A	N/A
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy	N/A	N/A
Conclusion	The Sustainability Appraisal shows that Option 2 scores more positively than Option 1 against the Sustainability Objectives. This is mainly because Option 2 provides an opportunity for some additional pitches in the future as well as an opportunity to reduce flood risk on the gypsy and travellers site.	

APPENDIX VII – APPRAISAL OF OBJECTIVELY ASSESSED HOUSING NEED (5,820 DWELLINGS OVER PLAN PERIOD) AGAINST PROPOSED SUBMISSION ADUR LOCAL PLAN (2016) HOUSING TARGET (3,609 DWELLINGS OVER PLAN PERIOD)

Introduction

As discussed in Chapter 13 (within Part 2) above, it was considered necessary to assess the most recent Objectively Assessed Need (OAN) for Housing against the housing target in the Proposed Submission Adur Local Plan (2016). As set out in Chapter 13, the OAN scenario (Option 2) is based on a density of 40-50dph at both West Sompting and New Monks Farm and an increase in the size of the West Sompting allocation from 27ha to 47ha and an increase in the size of the development area of the New Monks Farm allocation from 27ha to 43ha.

The aim of this appendix is to present these finding in full.

Methodology

See Appendix IV

Appraisal findings:

	Option 1 - Provision of 3609 dwellings in line with the housing target in Policy 3 of the Adur Local Plan	Option 2 - Provision of 5820 dwellings in line with Objectively Assessed Housing Need.
1. Increase energy efficiency and encourage the use of renewable energy sources	N/A	N/A
2. Protect and enhance water quality and encourage the sustainable use of water	N/A	N/A
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials	N/A	N/A
4. Conserve, protect and enhance biodiversity	<p>Amber</p> <p>The provision of 3609 dwellings includes development on 2 greenfield sites – New Monks Farm and West Sompting. Although there is an SNCI at West Sompting, this is not included within the developable area and development provides opportunities to improve and expand this area.</p> <p>There are areas of biodiversity value within the New Monks Farm</p>	<p>Amber</p> <p>The provision of 5820 dwellings would include development on 2 greenfield sites – New Monks Farm and West Sompting. Although there is an SNCI at West Sompting, this is not included within the developable area and development provides opportunities to improve and expand this area.</p> <p>There are areas of biodiversity value within the New Monks Farm</p>

	<p>site, particularly associated with the ditches running through the site but there are no specifically designated areas of biodiversity importance.</p> <p>Outside of the greenfield sites, no development would have a direct impact on any designated sites of biodiversity value.</p> <p>Nevertheless, Option 1 is likely to have less impact on biodiversity than Option 2.</p>	<p>site, particularly associated with the ditches running through the site but there are no specifically designated areas of biodiversity importance.</p> <p>Outside of the greenfield sites, no development would have a direct impact on any designated sites of biodiversity value.</p> <p>Nevertheless, Option 2 is likely to have less impact on biodiversity than Option 1.</p>
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes	<p>Amber</p> <p>Development at New Monks Farm would require a new roundabout from the A27. This is likely to be located adjacent to the Trainer Dome Scheduled Ancient Monument (SAM) at Shoreham Airport. While there may be opportunities to improve the condition of the SAM through new development, the roundabout will need to be designed to reduce its impact on the SAM.</p> <p>Development at New Monks Farm and West Sompting would be located within the local green gaps between settlements. These gaps form part of the setting and identity of settlements and, as a result, form part of the historic environment. While these development allocations have been located to minimise the impacts on the local green gaps and the setting of settlements, as well as retain the principle and function of the gaps, there will inevitably be some impact on these gaps. There will also be some impact on views from the South Downs National Park.</p>	<p>Red -</p> <p>Development at New Monks Farm would require a new roundabout from the A27. This is likely to be located adjacent to the Trainer Dome Scheduled Ancient Monument (SAM) at Shoreham Airport. While there may be opportunities to improve the condition of the SAM through new development, the roundabout will need to be designed to reduce its impact on the SAM.</p> <p>Development at New Monks Farm and West Sompting would be located within the local green gaps between settlements. These gaps form part of the setting and identity of settlements and, as a result, form part of the historic environment. To achieve the OAN figure of 5820 dwellings, this option would involve significantly more land take in the local green gaps and while this would not result in the development of the whole of the gap, the purpose and function of the gaps would be significantly compromised. Not only would there be more development in the gaps but the densities are likely to be higher than Option 1 with a range of 40-50dph for developments in both New Monks Farm and West Sompting. Such densities would be required to meet the OAN. There would also be impacts on views from the National Park.</p> <p>There is more potential for</p>

		development in West Sompting to impact on the setting of Sompting Village Conservation Area with this option although this would be more of a detailed design issue.
6. Protect and enhance the countryside	<p>Red -</p> <p>New Monks Farm and West Sompting are within the Local Green Gap which is also designated countryside. While these development allocations have been located to minimise the impacts on the local green gaps and countryside, there will inevitably be some impacts. There will also be some impact on views from the South Downs National Park.</p>	<p>Red - -</p> <p>New Monks Farm and West Sompting are within the Local Green Gap which is also designated countryside.</p> <p>To achieve the OAN figure of 5820 dwellings, this option would involve significantly more land take in the local green gaps and countryside and while this would not result in the development of the whole of the gap, the purpose and function of the gaps would be significantly compromised and the countryside significantly impacted. There would also be impacts on views from the National Park. Not only would there be more development in the countryside but the densities are for West Sompting are likely to be higher than Option 1 with a range of 40-50dph for developments in both New Monks Farm and West Sompting. Such densities would be required to meet the OAN.</p> <p>The area of countryside between Lancing/Sompting and Worthing is assessed in the Adur Landscape Sensitivity Assessment 2015 as having a medium-high overall landscape sensitivity so it is clearly a sensitive landscape area that would be significantly impacted by the amount of housing within it (approximately 1600 houses) required to meet the OAN.</p>
7. Protect and enhance public open space / green infrastructure and accessibility to it	<p>Amber</p> <p>The local green gaps/countryside between the settlements of Lancing & Shoreham and Sompting/Lancing and Worthing form a key part of the district's green infrastructure although public access to them is extremely limited. Though both the New Monks Farm and West Sompting site allocations would</p>	<p>Red -</p> <p>The local green gaps/countryside between the settlements of Lancing & Shoreham and Sompting/Lancing and Worthing form a key part of the district's green infrastructure although public access to them is extremely limited. Under this option, both the New Monks Farm and West Sompting</p>

	<p>result in a significant amount of countryside being developed, the New Monks Farm development would provide a new Country Park which would open up public access into the gap and the West Sompting development would provide public access across the local green gap.</p> <p>There are also opportunities to provide open space and green infrastructure within the development.</p>	<p>developments would result in a large amount of countryside being developed. A Country Park would be provided as part of the New Monks Farm development and this would open up public access into the gap. However, the Country Park would have to be significantly smaller than that of Option 1 to help meet the OAN</p> <p>The West Sompting development would provide public access across the local green gap although there would be significantly less of the green gap left with this option.</p> <p>There will be opportunities to provide open space and green infrastructure within the development.</p>
8. To reduce pollution and the risk of pollution to air, land and water	<p>Amber</p> <p>Developments proposed at New Monks Farm and West Sompting will result in additional car movements which have potential to result in more air pollution. However, there are likely to be significantly less additional car movements with this option than Option 2.</p> <p>Any potential pollution to water or land is unclear at this stage but should be mitigated in accordance with environmental legislation and policies within the Adur Local Plan</p>	<p>Amber</p> <p>Developments proposed at New Monks Farm and West Sompting will result in additional car movements which have potential to result in more air pollution. This option would result in significantly more car movements than Option 1. Nevertheless, the levels of pollution from such a development are difficult to quantify at this stage.</p> <p>Any potential pollution to water or land is unclear at this stage but should be mitigated in accordance with environmental legislation and policies within the Adur Local Plan</p>
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events	N/A	N/A
10. To improve health and wellbeing and reduce inequalities in health	<p>Amber</p> <p>The New Monks Farm development would deliver a country park which would provide public access into a previously restricted gap. The West Sompting development is required to provide two youth size football pitches. The country park and the pitches would be beneficial to</p>	<p>Amber</p> <p>The New Monks Farm development would deliver a country park (albeit smaller than the park provided by Option 1) which would provide public access into a previously restricted gap. The West Sompting development is required to provide two youth size football</p>

	<p>health and contribute to this objective.</p> <p>The New Monks Farm allocation would result in a significant amount of development (including 600 houses) in an area at risk of flooding which has potential for negative wellbeing impacts. Nevertheless, the site has passed the sequential and exception test and a flood risk assessment would be required demonstrating that the development will be safe for its lifetime without worsening flood risk elsewhere.</p>	<p>pitches. The country park and the pitches would be beneficial to health and contribute to this objective.</p> <p>This option would result in a significant amount of development (between 1600-2000 dwellings) in an area at risk of flooding which has potential for negative wellbeing impacts. While the New Monks Farm site has passed the sequential test and the exception test, this was for 600 dwellings. It is unclear at this stage whether the increased amount of development required to meet the OAN could pass the exception test.</p>
11. To reduce crime, the fear of crime and antisocial behaviour	N/A	N/A
12. Promote sustainable transport and reduce the use of the private car	N/A	N/A
13. To reduce poverty, social exclusion and social inequalities	<p>Green +</p> <p>This option would provide 3609 dwellings between 2011 to 2031. A significant proportion of these dwellings (approximately 30%) are likely to be 'affordable'. This level of affordable homes would help contribute to this objective.</p>	<p>Green ++</p> <p>This option would provide 5820 dwellings between 2011 to 2031. A significant proportion of these dwellings (approximately 30%) are likely to be 'affordable'. This level of affordable homes would make a significant contribution to this objective.</p>
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing	<p>Green +</p> <p>This option would provide 3609 dwellings between 2011 to 2031 which would meet just under two thirds of the housing need in the district. A significant proportion of these dwellings (approximately 30%) are likely to be 'affordable'. This amount of dwellings would help contribute to this objective.</p>	<p>Green ++</p> <p>This option would provide 5820 dwellings between 2011 to 2031 which would meet Adur's full OAN. A significant proportion of these dwellings (approximately 30%) are likely to be 'affordable'. This amount of dwellings would make a significant contribution to this objective.</p>
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals	N/A	N/A
16. Promote sustainable economic development with supporting	<p>Green +</p> <p>The provision of 3609 homes between 2011 and 2031 would benefit local business by</p>	<p>Green ++</p> <p>The provision of 5820 homes between 2011 and 2031 would significantly benefit local</p>

infrastructure, and ensure high and stable levels of employment and a diverse economy	providing an additional labour force in the area. Additionally, in the short term, the construction phase of the development would provide a number of jobs.	businesses by providing an additional labour force in the area. Additionally, in the short term, the construction phase of the development would provide a significant number of jobs.
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development	Red - The allocation for New Monks Farm includes 600 new dwellings. Much of this site is located within flood zone 3a and there are also surface water issues and the potential for groundwater flooding. The site has passed the sequential and exception test and a flood risk assessment would be required demonstrating that the development will be safe for its lifetime without worsening flood risk elsewhere. However, there is still some conflict with this objective.	Red - - In order to meet the OAN, 1600-2000 new dwellings would be required at New Monks Farm. Much of this site is located within flood zone 3a and there are also surface water issues and the potential for groundwater flooding. While the New Monks Farm site has passed the sequential test and the exception test, this was for 600 dwellings. It is unclear at this stage whether the increased amount of development required to meet the OAN could pass the Exception Test.
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres	Green + Large scale housing development at Lancing (New Monks Farm), West Sompting and Shoreham Harbour is likely to generate additional footfall in the town centres of Worthing, Lancing and Shoreham helping to ensure their vitality and viability.	Green ++ Large scale housing development at Lancing (New Monks Farm), West Sompting and Shoreham Harbour is likely to generate significant additional footfall in the town centres of Worthing, Lancing and Shoreham helping to ensure their vitality and viability.
19. Create places and spaces and buildings that work well, wear well and look good	N/A	N/A
20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs	N/A	N/A
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy	N/A	N/A
Conclusion	Whilst Option 1 scores well with regard to a number of social and economic objectives, Option 2 scores particularly well against these objectives and would clearly have significant social and economic impacts. However, with regard to the environmental objectives, while neither option scores particularly well, Option 2 scores notably worse against these objectives as it would result in a significant increase in the amount of development within the local green gaps compared	

	against Option 1. Option 1 achieves a greater balance between the differing social, environmental and economic sustainability objectives than Option 2.
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