

Sustainability Appraisal (SA) of the Adur Local Plan



SA Report

Non-technical Summary

March 2016

INTRODUCTION

This Sustainability Appraisal has been undertaken in support of the emerging Adur Local Plan. The Local Plan, once adopted, will present a spatial strategy for the District 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.

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 the positives. SA of the Adur Local Plan is a legal requirement stemming from the EU Strategic Environmental Assessment (SEA) Directive.

This is the **non-technical summary** of the SA Report being published alongside the proposed submission version of the Adur Local Plan. This summary should be read alongside the main SA Report document.

Structure of the SA Report / this non-technical summary

The SA Report (and this non-technical summary) sets out to answer four questions:

1. What's the scope of the SA?
2. What has plan-making / SA involved up to this point?
3. What are the appraisal findings and recommendations at this current stage?
4. What are the next steps?

WHAT'S THE SCOPE OF THE SA?

An important first step in the SA process involves establishing the 'scope', i.e. those sustainability issues and objectives which should be a focus of the SA, and those that should not. In order to establish the scope there is a need to answer a series of questions including:

- What's the sustainability 'context'?
 - Answering this question primarily involves reviewing Government's National Planning Policy Framework; however, it is also important to 'cast the net wider' and consider contextual messages established through other plans, policies, strategies and initiatives.
- What's the sustainability 'baseline'?
 - Answering this question involves reviewing available data to establish an understanding of the current and likely future state of the environment / socio-economy locally.

The following is a brief summary of some of the sustainability issues described within the SA Report. It is important to emphasise that the following list is not comprehensive.

Environmental issues

- 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.

Communities baseline

- 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 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.

Economic baseline

- 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.

The SA 'framework'

Drawing on the findings of the context / baseline review, 21 'sustainability objectives' were identified. These objectives – and the associated criteria - provide a methodological 'framework' for the SA.

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?

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
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?
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?

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
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?
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?

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
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?

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

It is a legislative requirement that every SA Report includes an explanation of how/why the preferred (i.e. draft plan) approach was selected/developed in-light of earlier appraisal of 'reasonable alternatives'. As such, an interim stage of SA (i.e. a stage prior to appraisal of the draft plan / preparation of the SA Report) must involve appraisal of reasonable alternatives.

Work at the interim appraisal stage focused on the appraisal of alternatives for:

1. The spatial strategy;
2. Shoreham airport development; and
3. Development of a new roundabout on the A27

(1) is a key issue, and in practice was a major focus of alternatives appraisal work. As such summary information is presented below. Information on (2) and (3) can be found in the main body of the SA Report.

In addition, a number of amendments to the New Monks Farm policy/site allocation (as part of a Regulation 18 consultation in December 2015) were appraised as well as the most recent Objectively Assessed Need for Housing figure (5,820 dwellings over the plan period) which was compared against the housing target of 3,609 dwellings in the Adur Local Plan. Further information on these appraisals can be found in the main body of the SA report.

Alternative spatial strategies

The table below shows the alternatives that were a focus of appraisal. The alternatives – which vary in terms of the distribution of development across four sites - were identified subsequent to appraisal of 19 site options.

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 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

Appraisal findings are presented within the main body of the SA Report. The text below summarises the Council's response to appraisal findings, i.e. the Council's reasons for selecting the preferred approach in-light of the appraisal.

The Council's reasons for selecting the preferred approach in-light of alternatives appraisal

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).

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.

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 and the capacity of infrastructure;
- facilitate the regeneration of Adur; and
- meet other plan objectives.

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.

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.

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.

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.

WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

Part 3 of the SA Report answers the question ‘What are appraisal findings at this current stage?’ by presenting an appraisal of the Proposed Submission Plan. The appraisal is presented under the 21 SA objective headings established through scoping.

The conclusion of the appraisal is as follows:

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.

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 to the countryside and impacts around flood risk, as mentioned above) are mitigated and minimised.

As part of the appraisal presented in Part 3 of the report there is a particular focus on the ‘**cumulative effects**’ that might result, i.e. the effects resulting from the Plan being implemented alongside other planned activities outside of the control of Adur Council. In particular, there is a focus on appraising the potential for cumulative effects on the South Downs National Park (SDNP) and the Coastal West Sussex and Greater Brighton Strategic Planning Board Area (SPBA).

In terms of the SDNP, the Local Plan respects and supports the Park’s objectives. In particular, the preferred spatial strategy recognises the importance of local gaps in ensuring the setting of the National Park – i.e. recognises a need to avoid a situation where the National Park is bounded by ribbon development.

With respect to the SPBA, the Local Plan sets out to meet housing needs and deliver employment land to meet demand in so far as is possible given constraints. In this way, the Local Plan will contribute to sub-regional economic growth and regeneration. The plan also contributes through the support for regeneration at Shoreham Harbour and also support for additional employment floorspace at Shoreham Airport.

The position of Adur within the sub-region



WHAT ARE THE NEXT STEPS?

Subsequent to the current consultation the Council's intention is to submit the plan to Government, alongside a summary of the issues raised through consultation, so that it might then be examined by a Government appointed Planning Inspector as part of an Examination in Public. The Inspector will consider the Plan, the SA Report, evidence-base studies and representations received before then either reporting back on the Plan's soundness or identifying the need for modifications. 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) 'measures decided concerning monitoring'.

Monitoring

The 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. 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
- 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