



Adur Local Plan 2017

Sustainability Appraisal

Post-Adoption Statement

November 2017

Introduction

In accordance with European¹ and national legislation², development plans must be subject to the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) processes.

A Sustainability Appraisal (SA) aims to predict and assess the economic, social and environmental effects that are likely to arise from implementing development plans. It is a process for understanding whether policies, strategies or plans promote sustainable development, and for improving them to deliver more sustainable outcomes.

A Strategic Environmental Assessment (SEA) aims to predict and assess the environmental effects that are likely to arise from plans, policies and strategies, such as a Local Plan. It is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes. For the purposes of the Local Plan, the SEA process was incorporated into the SA process.

Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 (from hereon in referred to as the SEA Regulations) sets out the requirements with regard to the post adoption procedures of the SA/SEA. This statement has been prepared in accordance with this regulation.

In accordance with the SEA Regulations, this statement sets out the following:

- (a) How environmental considerations have been integrated into the Plan;
- (b) How the environmental report has been taken into account;
- (c) How opinions expressed in response to public consultation and how the results of any consultations have been taken into account;
- (d) The reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with; and
- (e) The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan.

¹ A Strategic Environmental Assessment (SEA) is a requirement of the SEA Directive, as well as the Environmental Assessment of Plans and Programmes Regulations 2004.

² A Sustainability Appraisal is a requirement of the Planning and Compulsory Purchase Act 2004.

(a) How environmental considerations have been integrated into the Local Plan

The SA and SEA process has been fully integrated into the plan-making process, with its findings being a key influence on the policy decisions made.

Stages of the SA/SEA

In May 2011, an SA Scoping Report was produced for consultation. Amongst other things the Report had sections that:

- Collated baseline information (economic, social and environmental) presenting the current picture of the Adur District and identified a number of sustainability issues (see Appendix 1)
- Developed a Sustainability Framework, comprising a set of sustainability objectives and criteria. Since 2011 the 'supporting criteria have been updated (see Appendix 2).

The Sustainability Framework was developed to assess the policy options and draft policies developed through the preparation of the Local Plan. The objectives were specifically identified to address the environmental, economic and social issues in the district. The Scoping Report was then amended to take account of comments from the statutory consultees as well as other relevant stakeholders and a final version of the Scoping Report was issued in June 2011.

Also in June 2011 a 'Sustainability Appraisal and Strategic Environmental Assessment of the Core Strategy - Housing and Employment Options' was produced. This appraised the following:

- 4 housing options ranging from 65 homes per year to 270 homes per year over the plan period.
- 2 employment options – a 'baseline' scenario and an 'economic intervention' scenario.

In September 2012, the SA accompanying the Draft Adur Local Plan was published for consultation and appraised the following:

- The Draft Local Plan objectives and their compatibility with the Sustainability objectives;
- A number of different site options;
- Four different housing options ranging from 1,785 to 2,635 homes (excluding 1050 homes proposed at Shoreham Harbour).
- Draft policies in the Local Plan covering issues such as housing, economic growth, site specific allocations and broad locations, place based policies, countryside, as well as a number of Development Management policies;
- The cumulative impact of the policies in the Draft Adur Local Plan.

The SA of the Revised Draft Adur Local Plan 2013 was published in September 2013 and further refined the appraisals of policies and site options undertaken in 2012. Additionally, the SA appraised new policies that had been included in the Plan as well as new site options. The SA also assessed different Shoreham Airport

development quantum and locations, as well as different locations for the proposed roundabout on the A27.

In September 2014, the SA accompanying the Proposed Submission Adur Local Plan was published. This updated the 2013 SA and reflected amendments made to the Revised Draft Adur Local Plan 2013.

In December 2015, a consultation was undertaken on Proposed Amendments to the New Monks Farm Allocation within the Proposed Submission Adur Local Plan 2014. This consultation proposed that:

- 1) The number of potential homes is stated as 600.
- 2) The indicative location of the proposed roundabout is moved eastwards to a more central location between the airport and New Monks Farm site.
- 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.
- 4) The site allocation boundary is amended to include the existing Withy Patch site.
- 5) The proposed Built Up Area Boundary amendment is shown as indicative.

The above amendments (along with a number of other necessary amendments) were assessed in the SA that accompanied the 'Amendments to the Proposed Submission Adur Local Plan' document published in March 2016. In addition this SA also assessed the social, economic and environmental impacts of meeting Adur's Objectively Assessed Housing Needs (5,820 homes over the plan period at that time) and compared and contrasted this with the figure of 3,609 homes proposed in the Plan.

The Submission SA was published in October 2016. This was almost identical to the SA published in March 2016 but a small number of changes were made to correct drafting errors or provide a greater degree of clarity. In addition to the SA, a 'Proposed Major Modifications Sustainability Appraisal Addendum' (October 2016) was published which appraised all the major modifications proposed to the 'Amendments to Proposed Submission Adur Local Plan' document.

The Adur Local Plan was submitted for examination in October 2016. Hearing sessions took place in January and February 2017 as part of the examination. A 'Preliminary Findings' letter (ID-7) was subsequently received from the Inspector in May 2017. Following this the Council published Main Modifications for consultation from 15 June to 26 July 2017. These were accompanied by the 'Addendum to the Sustainability Appraisal of the Adur Local Plan - Proposed Main Modifications' (June 2017). This indicated the implications of the modifications for the SA and considered whether the Main Modifications required SA. Where it was considered that SA was required, a detailed assessment was undertaken.

The table below outlines how this iterative process has taken place.

Local Plan Production Stage	Sustainability Appraisal Production Stage	When Published
	Scoping Report	June 2011

Core Strategy Housing and Employment Options	Sustainability Appraisal and Strategic Environmental Assessment of the Core Strategy Housing and Employment Options.	June 2011
Draft Adur Local Plan 2012	Draft Adur Local Plan SA Report	September 2012
Revised Draft Adur Local Plan 2013	Revised Draft Adur Local Plan SA Report	September 2013
Proposed Submission Adur Local Plan 2014	Proposed Submission SA Report	September 2014
Proposed Amendments to the New Monks Farm Allocations within the Proposed Submission Adur Local Plan 2015		December 2015
Amendments to the Proposed Submission Adur Local Plan 2016	Amendments to the Proposed Submission SA Report	March 2016
Submission Adur Local Plan 2016	Submission SA Report Proposed Major Modifications Sustainability Appraisal Addendum	October 2016 October 2016
Submission Adur Local Plan 2016: Inspector's Main Modifications	Addendum to the Sustainability Appraisal (SA) of the Adur Local Plan – Proposed Main Modifications	June 2017

(b) How the environment report has been taken into account

As shown in part (a), the SA has been an iterative process that has been fully integrated into the plan-making process and has ensured that sustainability has been an integral part of the Local Plan. At each stage, the findings of the SA, along with all other components of the Council's evidence base, have been considered by officers in developing the Local Plan.

The SA identified options for consideration and, through the detailed appraisal of options and draft policies, identified environmental and wider sustainability implications and was ultimately a key influence on the policy decisions made in the Adur Local Plan.

The SA has identified and tested options ('reasonable alternatives') and draft policies against the Sustainability Framework. By identifying environmental, social and economic issues, the SA was able to recommend the most sustainable options, propose mitigation measures and refine policy wording.

In October 2016, the Submission Version SA/SEA was published alongside the ALP and submitted to the Planning Inspectorate. The Inspector's Report on the Examination of the Adur Local Plan dated 29 September 2017 concludes that the Adur Local Plan 2016 provides an appropriate basis for the planning of that part of the District to which it applies. Furthermore the Inspector found that a sufficiently robust assessment of the reasonable alternative housing sites had been undertaken in the SA and that overall an adequate SA had been carried out meeting the legal requirement.

(c) How opinions expressed in response to public consultation and how the results of any consultations have been taken into account

The SA has been consulted upon extensively and in line with Regulation 13 of the SEA Regulations. As referred to in section (a), the consultation process has run in parallel with the preparation of the Adur Local Plan and has therefore been carried out in accordance with the Adur & Worthing Statement of Community Involvement.

A wide range of stakeholders, including statutory environmental bodies and members of the public, have been consulted at each stage of the statutory consultation process. The Statement of Consultation, published alongside the Submission Local Plan in October 2016, provides a summary of the consultation that has taken place on the Adur Local Plan at the statutory consultation stages.

A draft Scoping Report was published for consultation in May 2011. The Scoping Report set out the Sustainability Framework against which options and policies would subsequently be appraised, ultimately informing the Adur Local Plan. The following bodies were consulted on the Scoping Report:

- Natural England
- English Heritage (now Historic England)
- The Environment Agency
- Sussex Wildlife Trust
- Sport England
- The Highways Agency (now Highways England)
- Adur & Worthing Business Partnership
- West Sussex County Council
- Neighbouring Authorities

A number of amendments were made to the Scoping Report as a result of this consultation and a final version was published in June 2011. Many of the amendments consisted of additions to the supporting criteria for various Sustainability Objectives, therefore improving the overall Sustainability Appraisal Framework. New sustainability problems and issues were also added.

A relatively small number of representations were received regarding the SA at subsequent stages in the production of the Adur Local Plan. Some of these comments objected to the scoring of various options and policies, all of which were given full consideration by officers as well as the Inspector through the Examination process. Also, partly as a result of consultee feedback, various amendments have

been made to the SA to correct inaccuracies and update baseline data and appraisal assessments where necessary.

(d) The reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with;

The SEA Regulations require environmental reports to consider reasonable alternatives. Part 2 (Sections 9-13) of the Adur Local Plan Sustainability Appraisal (October 2016) appraises a number of different alternatives that have been considered through the production of the Adur Local Plan. These alternatives relate to the following:

- Housing - how much housing growth should be accommodated in Adur and where should it be directed to?
- Shoreham Airport development – where should development be located and how much?
- New roundabout on the A27 – where should it be located?
- New Monks Farm – various policy wording alternatives.

The SA has been an iterative process and while some of these alternatives were identified early on in the plan-making stage, others were developed as the Plan progressed and new issues arose.

In nearly every case, the option that performed best when assessed through the SA process was selected. The only exception was in relation to the roundabout on the A27 where the central option was selected because it was more deliverable, despite the potential for slightly greater impacts on the countryside and heritage.

Overall, the SA process found that the strategic, place based and development policies in the Adur Local Plan performed well when assessed against the SA Framework. It is considered that mitigation measures introduced into policy wording will reduce or prevent potential adverse impacts. Furthermore, the planning application process will allow further consideration of site-specific issues through detailed supporting documents (where necessary) such as Environmental Impact Assessments and the use of planning conditions or obligations that will further prevent, reduce or compensate for any harmful impacts.

(e) The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan

Part 4 of the Adur Local Plan SA identified the following monitoring indicators that are particularly important from a sustainability perspective:

- Number and percentage of new non-residential developments meeting or exceeding BREEAM Very Good standard
- Number and type of renewable energy developments / installations
- 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 per annum
- Extent and condition of SSSIs
- 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 per 1000 population
- Number of Air Quality Management Areas (AQMAs)
- NO2 levels within monitored areas
- Number of completed developments 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
- 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 new floorspace for 'town centre uses' provided within town centres
- Changes of use (completions) in local parades per annum
- Number of design awards won for buildings/places

Appendix 3 of the Adur Local Plan includes a Monitoring Framework which will monitor the implementation of the Local Plan policies to determine whether its main aims and objectives are being achieved. The Monitoring Framework of the Local Plan includes the indicators identified above which will be important in monitoring the SA objectives in the implementation of the Local Plan. The monitoring process for the Adur Local Plan and the SA will be carried out on an annual basis through the Council's Annual Monitoring Report.

The monitoring process will enable Adur District Council to determine whether targets are being achieved and will be able to identify any significant environmental effects, in which case a review of certain Adur Local Plan policies may be required so that changes can be made to improve a policy's performance.

Appendix 1 – 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.

Appendix 2 – Sustainability 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?
10. Improve health and wellbeing and reduce inequalities in health	
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?

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
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.	
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development	
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing 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?