



11 August 2014

Ben Daines  
Senior Planning Officer,  
Planning, Regeneration and Wellbeing  
Portland House, 44 Richmond Road,  
Worthing, West Sussex, BN11 1HS

Our Ref: 47070635

Your Ref:

### **Sompting Neighbourhood Plan: Strategic Environmental Assessment (SEA) Screening Opinion**

Dear Ben,

Adur District Council has asked that URS provide an SEA Screening Opinion in relation to the Sompting Neighbourhood Plan. We have already provided an informal opinion (see email of July 1st), and the intention of this letter is to formalise matters.

#### **Background**

One of the basic conditions that a Neighbourhood Plan (NP) is tested against is whether the making of the NP is compatible with European Union obligations, including obligations under the SEA Directive. The SEA Directive seeks a high level of protection for the environment through the integration of environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is *"to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."*

To decide whether a proposed NP is likely to have significant environmental effects, it should be screened at an early stage against the criteria set out in Annex 2 of the Directive. Where it is determined that the NP is unlikely to have significant environmental effects (and, accordingly, does not require SEA), a statement of reasons for this determination must be prepared and published for consultation with the statutory consultation bodies (Natural England, the Environment Agency and English Heritage). Where a NP is likely to have a significant effect on the environment, an SEA process must be carried out and an Environmental Report prepared / published for consultation alongside the draft plan (which, for NPs, is the 'pre-submission' version of the plan).

The SEA Regulations state that a screening opinion should be reached by 'the responsible authority'. In this case there are two responsible authorities - Adur District Council (ADC) and the South Downs National Park (SDNP). It is these authorities that will eventually 'make' the NP part of their respective Local Plans. SDNP has already indicated (see email of 11<sup>th</sup> April) that the plan should be 'screened-in' - i.e. the plan be developed alongside SEA – whilst ADC has reserved judgement. It is appropriate, for URS to provide a Screening Opinion to ADC, drawing on our extensive experience as SEA practitioners in the context of Local and Neighbourhood Plan-making. Our relevant experience includes working as SEA consultants in support of both the Adur and South Downs Local Plans.

URS Infrastructure & Environment UK Limited  
6-8 Greencoat Place  
London  
SW1P 1PL  
United Kingdom  
Tel: +44 (0)20 7798 5000  
Fax: +44 (0)20 7798 5001  
[www.ursglobal.com](http://www.ursglobal.com)

URS Infrastructure & Environment UK Limited  
Place of Registration: England & Wales  
Registered Number: 880328  
Registered Office: Scott House, Alençon Link, Basingstoke, Hampshire, RG21 7PP, United Kingdom

## The emerging Sompting Neighbourhood Plan

The Parish of Sompting is situated between Lancing and Worthing in West Sussex. Roughly a third of the Parish is situated south of the A27 coastal road. This part of the Parish comprises modern housing to the east, the historic village of Sompting and open land that forms a 'strategic gap' between Lancing and Worthing. The majority of the northern two thirds falls within the South Downs National Park.

ADC and SDNP have designated a Neighbourhood Area for the whole of the Parish for the purpose of preparing the NP. The Parish Council began the process of preparing a plan in 2011, in order to take the opportunity presented by the Localism Act to positively plan for the future of the parish and its surrounding countryside. It is also being developed in response to the emerging Adur Local Plan, which proposes to allocate land for a 480 home scheme at 'West Sompting'.

A State of the Parish report has been prepared, the aim of which is to *"summarise the evidence base and the context within which the Neighbourhood Plan will be prepared [and hence] provide the local community with a starting point from which to embark on formulating the Neighbourhood Plan."* Key issues for the local area are identified, drawing on questionnaire responses and other sources of evidence.

Whilst 'objectives' for the Local Plan have not been formalised (or, at least, are not available at the current time), a Draft Policies and Proposals document (April 2014) has been prepared, and is available to inform SEA Screening. On the basis of this document, it is understood that:

- A policy will establish acceptable future uses for Land at the former Waste Transfer Site off Halewick Lane;
- A policy will set out key development and design principles for the 480 home scheme at West Sompting that is set to be allocated through the Adur Local Plan; and
- There will be a number of further thematic policies – e.g. in relation to housing design – that will form part of the suite of development management policies to be taken into account by ADC / SDNP when determining future planning applications.

## SEA Screening

### *Effects of a policy relating to Land at the former Waste Transfer Site off Halewick Lane*

A policy that establishes acceptable future uses for this site could potentially lead to significant environmental effects. As such, it should be developed alongside a process of SEA, with a view to ensuring that the policy, once finalised, is best performing.

This conclusion reflects the location of the site within the boundary of the National Park. 'Landscape' is an issue that can trigger the need for SEA (see Annex 1(f) of the SEA Directive), i.e. impacts to landscape can potentially equate to significant environmental effects. Furthermore, the Directive is clear that, when identifying/evaluating significant environmental effects, there is a need to account for *"the value and vulnerability of the area likely to be affected due to special natural characteristics or cultural heritage... and the effects on areas or landscapes which have a recognised national status."* SDNP officers have indicated that there is the potential for significant effects to the National Park, and considerable weight must be given to this viewpoint given officers' understanding of sensitivities.

The potential for significant effects is identified in-light of the following further considerations –

- The policy may well only establish 'broad development principles' for the site, as opposed to establishing precisely what type of development would be acceptable. It may be the case that the site is not 'allocated' in the sense that SDNP can assume that development will occur and hence identified needs (for employment development in this case) will be met at the site. In other words, the outcome of the policy may well not be a situation whereby redevelopment of the site is a certainty. However, the fact is that the policy will 'open the door' to redevelopment to some (significant) extent, and as such could lead to effects.

- Policy for the site would only ever involve establishing support for relatively small scale business uses, e.g. flexible 'start-up' business units. The potential for any such use to impact on the SDNP is less than would be the case if consideration was being given to residential use or any other more intensive use (e.g. multi-storey buildings).
- The current situation is one whereby there are industrial buildings on the site, and hence it could be argued that *any* redevelopment for small scale business uses (which is the type of redevelopment under consideration) would be an improvement 'on the baseline'. However, there is also a need to consider that the future situation for the site, in the absence of a policy establishing broad principles for redevelopment, could be one whereby existing buildings are demolished and the site enters low intensity use (i.e. a use that does not impinge on landscape).

#### *Effects of a policy establishing development and design principles for West Sompting*

The West Sompting site lies directly to the south of the A27, i.e. outside but directly adjacent to the SDNP. It is unlikely that any policy approach taken would lead to significant effects on the SDNP, given that the site boundary and overall density of development on the site will be determined through the Adur Local Plan. Landscape effects might result if it were the case that policy lends support for higher density development to the site's northern extent, which is closest to the SDNP boundary; however, this scenario is unlikely, i.e. can be avoided through the application of common sense rather than SEA.

Having concluded that there is little or no potential for a policy on West Sompting to result in significant effects to the integrity of the SDNP, it is important to state that there must be some uncertainty given that the SDNP officers have voiced their concerns. SDNP officers' concerns reflect a view that the integrity of the 'strategic gap' between Lancing and Worthing is important to the setting (and therefore integrity) of the SDNP. Furthermore, it is important to consider the potential for a policy on West Sompting to impact on the integrity of the SDNP 'in-combination' with a policy on Land at the former Waste Transfer Site off Halewick Lane. No viewpoint analysis has been undertaken, but it is likely that there are locations in the SDNP from which there is a view of both areas.

Of course, a policy setting out development and design principles for a 480 home scheme at West Sompting could also lead to environmental effects besides those associated with the SDNP. For example, there could be impacts to 'biodiversity', 'air quality' or 'human health' (all of which are issues that are mentioned within Annex 1(f) of the SEA Directive). However, effects are not likely to be 'significant' to the extent that they would trigger the need for SEA. Effects could be appropriate addressed (i.e. avoided or mitigated) at the planning application stage.

#### *Effects associated with thematic policies*

It is unlikely that any of the thematic policies would, in isolation, lead to significant effects on the SDNP. Nor is there the potential for significant effects on any other aspect of the environmental baseline. This statement is made in-light of the fact that the Parish is associated with other sensitivities aside from the SDNP. For example:

- Areas of landscape outside of the SDNP boundary form an important 'strategic gap' between Lancing and Worthing and also contribute to green infrastructure at the district scale (see the Adur District Green Infrastructure Wildlife Corridors Study 2009);
- An element of the Cissbury Ring Site of Special Scientific Interest (SSSI) – which is associated with chalk grassland habitats – falls within the north-western extent of the Parish (i.e. that part of the Parish that is furthest away from the built-up area);
- Large portions of the Parish are in the Entry Level and High Level Stewardship Schemes;
- The Parish contains a number of listed buildings and structures; and
- Sompting Village has the enclosed character of an old village with listed buildings, small scale fields and orchards.

It might be that there is some potential for thematic policies to impact (in particular on the sensitive landscape of the SDNP) when considered 'in-combination', and/or when considered in combination with a policy on West Sompting and a policy on Land at the former Waste Transfer Site off Halewick Lane. However, there is little certainty in this respect.

## Conclusions (Screening Opinion)

It is URS' opinion that the Sompting NP should be developed alongside an SEA process, given that there could be the potential to impact on the integrity of the SDNP and hence - given SEA Directive criteria – there is the potential for 'significant environmental effects'. Although the magnitude of effects may be relatively low (compared, for example, to a NP that seeks to allocate land for housing) the SDNP landscape is highly sensitive. It is notable that SDNP officers have voiced their concerns, i.e. believe that there is the potential for significant effects.

### What does SEA involve?

There is firstly a need to 'scope' the SEA, which essentially means establishing the issues/objectives that will be a focus of, and hence provide a methodological 'framework' for, subsequent assessment. The statutory consultees must be engaged at the scoping stage.

There is then a need to assess – against the SEA 'framework' established through scoping - 'reasonable alternatives'. In practice, this will probably mean assessing alternatives for the two key plan issues / policy areas, namely: 1) Land at the former Waste Transfer Site off Halewick Lane (*What uses should be supported at the site?*); and 2) West Sompting (*What development and design principles should be set?*)

Once alternatives have been assessed then the Parish Council will be in a position to finalise the Draft NP for consultation. Once the Draft NP is ready, it should be subjected to assessment – against the 'framework' – and findings presented within an 'Environmental Report' which is then published for consultation alongside the Draft NP.

The Environmental Report must present certain information besides the assessment of the Draft Plan with a view informing consultation on 'the draft plan and reasonable alternatives' (SEA Directive Article 5(1)). Essentially, the Environmental Report must answer four questions:

- 1) What's the scope of the SEA?
  - Answering this question simply involves summarising the outcome of the scoping stage.
- 2) What has plan-making / SEA involved up to this point?
  - Here there is a need to explain the 'story' of alternatives assessment. As well as presenting assessment findings, there is a need to explain the 'reasonableness' of the approach taken, and also explain why the preferred approach was selected/developed subsequent to the assessment.
- 3) What are assessment findings at this current stage?
  - Here there is a need to present the assessment of the Draft NP
- 4) What happens next?
  - Here there is a need to explain about the process of submission/examination etc. There is also a need to present 'measures envisaged concerning monitoring'.

We hope that this Screening Opinion is of use to Adur District Council. It is not the intention that this Screening Opinion should be taken as 'the last word', as there are a number of findings that could obviously be questioned / debated / the focus of further consideration. Our suggestion, however, is that further screening work would not represent time well spent, and that a better approach would be to commence the SEA process.

Yours sincerely  
for URS Infrastructure & Environment UK Limited



Mark Fessey  
Principal Consultant  
Direct Line: 020 7798 5175  
[Mark.fessey@urs.com](mailto:Mark.fessey@urs.com)