

AULU

Scoping Report

Aldingbourne Neighbourhood Plan Steering Group

September 2019

Quality information

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Revision History

| Revision | Revision date | Details | Authorized | Name | Position |
|----------|------------------------------------|---|------------|--------------------------|-----------------------|
| V1.0 | 18 th September 2019 | Draft version for Neighbourhood Group comment | | Nick Chisholm- Batten | Associate Director |

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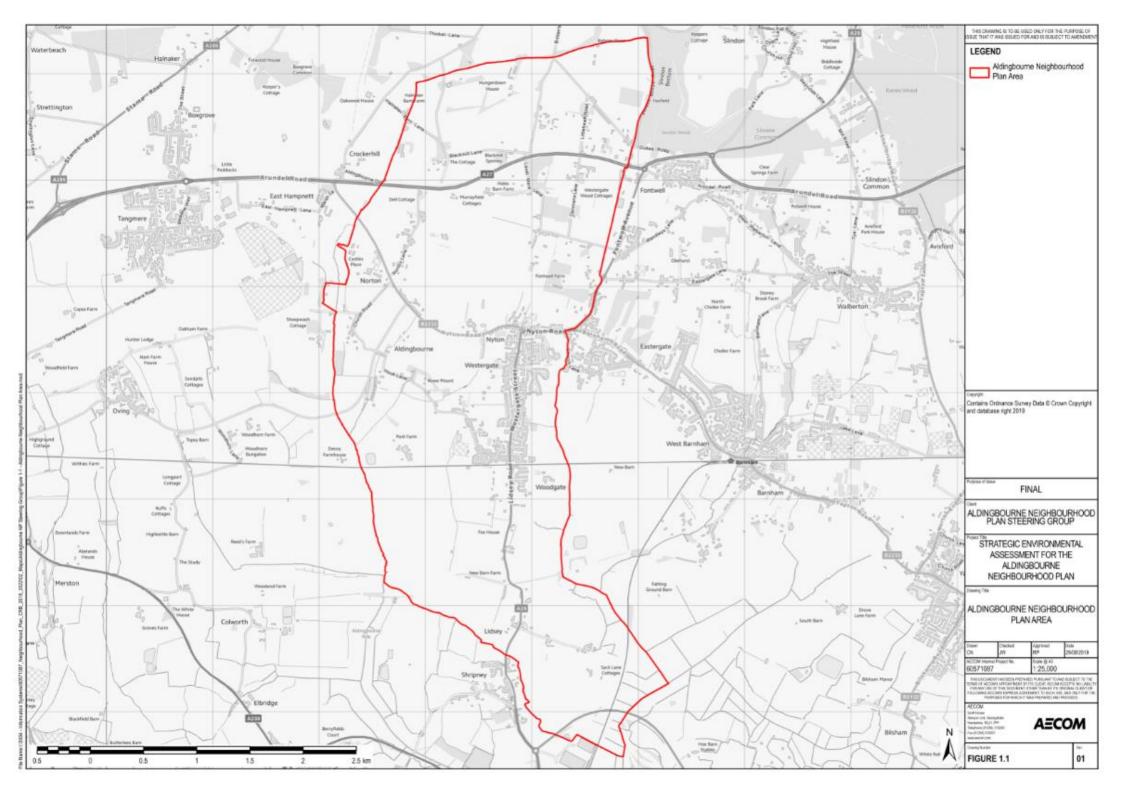
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Table of Contents

| 1. | Introduction1 | |
|-------------------------------|--|---|
| Relatior SEA Ex SEA 'Sc | ound1 nship of the Aldingbourne Neighbourhood Plan with the Arun Local Plan | 2 |
| 2. | Air Quality | |
| 3. | Biodiversity and Geodiversity7 | , |
| 4. | Climate Change14 | ŀ |
| 5. | Landscape23 | } |
| 6. | Historic Environment | |
| 7. | Land, Soil and Water Resources | , |
| 8. | Population and Community42 |) |
| 9. | Health and Wellbeing49 |) |
| 10. | Transportation | } |
| 11. | Next Steps | , |
| | juent stages for the SEA process | |



1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Aldingbourne Parish's emerging Neighbourhood Plan.
- 1.2 The Aldingbourne Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Adopted Arun Local Plan (ALP) (2011-2031).
- 1.3 It is currently anticipated that the Neighbourhood Plan will be submitted to Arun District Council later in 2019 and undergo a referendum in early 2020.
- 1.4 Key information relating to the Aldingbourne Neighbourhood Plan is presented in **Table 1.1**.

| Name of Responsible Authority | Aldingbourne Parish Council |
|-------------------------------|---|
| Title of Plan | Aldingbourne Neighbourhood Plan |
| Subject | Neighbourhood planning |
| Purpose | The Aldingbourne Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Adopted Arun Local Plan (2011-2031). |
| | The Aldingbourne Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area. |
| Timescale | To 2031 |
| Area covered by the plan | The Aldingbourne Neighbourhood Plan area covers the parish of Aldingbourne in West Sussex (Figure 1.1). |
| Summary of content | The Aldingbourne Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area. |
| Plan contact point | <mark>[TBC]</mark> Aldingbourne Parish Council Email address: <mark>[TBC]</mark> |

Table 1.1: Key facts relating to the Aldingbourne Neighbourhood Plan

Relationship of the Aldingbourne Neighbourhood Plan with the Arun Local Plan

- 1.5 The Aldingbourne Neighbourhood Plan is being prepared in the context of the Arun Local Plan (2011-2031) which was adopted in 2018. The Local Plan provides the broad policy framework and a long-term strategy to manage development, protect the environment, deliver infrastructure and promote sustainable communities within Arun District.
- 1.6 In the context of the Neighbourhood Plan area, Aldingbourne is designated as a 'village', along with the settlements of Barnham, Eastergate, Westergate, Walberton and Yapton. The Local Plan states that the settlements of Barnham, Eastergate and Westergate (which is within the Neighbourhood Plan area) are located close together and provide a range of local services and facilities. Comparatively, the settlement of Aldingbourne is noted as having a limited range of services and facilities.
- 1.7 Policy H SP1 'The Housing Requirement' within the Arun Local Plan¹ includes a strategic allocation of 2,300 dwellings (allocation SD5) to be delivered in Barnham, Eastergate and Westergate. The policy also notes that additional non-strategic allocations will be made across the district through emerging Neighbourhood Plans or reviews of 'made' Neighbourhood Plans. In this context, Arun District Council has confirmed a housing target of 70 dwellings for Aldingbourne Parish.
- 1.8 Neighbourhood plans will form part of the development plan for Arun, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Arun, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

SEA Explained

- 1.9 The Aldingbourne Neighbourhood Plan has been screened in by Arun District Council as requiring a Strategic Environmental Assessment (SEA). SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.
- 1.10 The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the Aldingbourne Neighbourhood Plan seeks to maximise the emerging plan's contribution to sustainable development.
- 1.11 SEA is undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.12 Two key procedural requirements of the SEA Regulations are that:
 - i. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 - ii. A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the draft Aldingbourne Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

¹ Arun District Council (2018): 'Arun Local Plan (2011-2031)', [online] available to access via: <<u>https://www.arun.gov.uk/adopted-</u> local-plan> last accessed [18/09/19]

This scoping report

1.13 This 'Scoping Report' is concerned with item 'i' above. It presents a suggested scope for the SEA so that the designated authorities (Historic England, Natural England, and the Environment Agency) can provide timely comment.

SEA 'Scoping' Explained

- 1.14 Developing he draft scope for the SEA as presented in this report has involved the following steps:
 - i. Defining the broader context for the Aldingbourne Neighbourhood Plan and associated SEA (i.e. EU, UK Government and local policy and commitments), to summarise the regulatory and legislative landscape;
 - ii. Establishing the baseline for the SEA, (i.e. the current and future situation in the area in the absence of the Aldingbourne Neighbourhood Plan, in order to help identify the plan's likely significant effects;
 - iii. Identifying particular problems or opportunities ('issues') that should be a particular focus of the SEA; and
 - iv. Developing a SEA Framework comprising objectives and appraisal questions on the basis of these issues which can then be used to appraise the draft plan.

Structure of this Report

Key Sustainability Issues

1.15 The outcomes of the scoping elements introduced through steps i-iv above have been presented under a series of key environmental themes, as follows:

- Air Quality;
- Biodiversity and Geodiversity;
- Climatic Factors (including flood risk);
- Landscape;
- Historic Environment;

- Land, Soil and Water Resources;
- Population and Community;
- Health and Wellbeing; and
- Transportation.
- 1.16 The selected environmental themes incorporate the 'SEA topics' suggested by Annex I (f) of the SEA Directive². These were refined to reflect a broad understanding of the anticipated scope of plan effects. It is intended that presenting the scoping information under these themes will help enable the reader to easily locate the information of greatest interest to them.
- 1.17 Once agreed (i.e. subsequent to consultation on this Scoping Report), the suggested scope presented under these nine themes will provide a methodological 'framework' for the environmental assessment of the draft plan and reasonable alternatives.
- 1.18 The discussion of the scoping information for each theme is presented in Sections 2 to 10.

SEA Framework to assess policy proposals

1.1 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the emerging Aldingbourne Neighbourhood Plan will be assessed consistently using the framework.

² The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus 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' [our emphasis]

1.2 The SEA objectives and appraisal questions proposed for the Aldingbourne Neighbourhood Plan SEA are presented under each of the themes in Sections 2 to 10.

2. Air Quality

Focus of Theme

- Air pollution sources
- Air quality hotspots
- Air quality management

Policy Context

- 2.1 Key messages from the National Planning Policy Framework (NPPF) include:
 - Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'
 - 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.'
 - New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- 2.2 Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'³ sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25 year plan directly relate to the air quality SEA theme.
- 2.3 Prepared in 2019, the Air Quality Annual Status Report for Arun District⁴ outlines five priority actions for improving air quality across the district, including:
 - Working with the county council to ensure traffic light sequencing operates at optimum efficiency, and promoting road traffic calming and routing away from residential and other areas where the public may suffer significant exposure;
 - Increasing education, raising awareness and the availability of air quality information and incentivising people to change their travel behaviour;
 - Cut Engine Cut Pollution" signs where there are periodic stationary traffic queues at level crossings, capitalising on opportunities and reduce emissions by 1%;
 - "Travelwise" schemes to promote sustainable transport to include more car share schemes and alternatives to the car, promotion of school and work travel plans, development and promotion of cycle routes; and

³ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-yearenvironment-plan.pdf [accessed 20/02/19]

⁴ Arun District Council (2019): 'Annual Status Report' [online] available to access via:

<https://www.arun.gov.uk/download.cfm?doc=docm93jijm4n14175.pdf&ver=14424 > last accessed [05/09/19]

- Working closely with planners and agencies to ensure appropriate mitigation measures are implemented for new developments and due consideration is given to air quality issues.
- 2.4 At the local level, policies within the 'Quality of the Environment' section of the Adopted Arun Local Plan (2011-2031) directly relate to the air quality SEA theme.

Baseline Summary

Summary of Current Baseline

- 2.5 Arun District Council is required to monitor air quality across the district under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO₂), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.
- 2.6 The 2019 Air Quality Annual Status Report (ASR) for Arun confirms that there are no AQMAs within the Neighbourhood Plan area, though the report also highlights that there is concern over increasing NO₂ levels from road traffic exhaust emissions in the wider area. These emissions are the main source of air pollution in the district. Currently, the air quality is deemed 'good' and the national air quality objectives for nitrogen dioxide (NO₂) are being met⁵.

Summary of Future Baseline

- 2.7 New housing and employment provision within the parish, including through the Arun Local Plan, has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO₂, particularly along the main routes through the Neighbourhood Plan area.
- 2.8 Implementation of the aims, objectives and policies contained in the Arun Local Plan and the Local Transport Plan (discussed in Chapter 10), present opportunities to continue to improve air quality within both the Neighbourhood Plan area and the wider district.

Key Sustainability Issues

- The 2019 ASR for Arun District confirms that there are no AQMAs within the Neighbourhood Plan area.
- The ASR highlights that there is concern over increasing NO₂ levels from road traffic exhaust emissions. These emissions are the main source of air pollution in the district.
- Due to the absence of any significant air quality issues within the Neighbourhood Plan area, the air quality theme has been scoped out for the purposes of the SEA process.

<https://www.arun.gov.uk/download.cfm?doc=docm93jijm4n14175.pdf&ver=14424> last accessed [17/09/19]

⁵ Arun District Council (2019) Air Quality Annual Status Report [online] available to access via:

3. Biodiversity and Geodiversity

Focus of Theme

- Nature conservation designations
- Geological sites
- Habitats
- Species

Policy Context

- At the European level, the EU Biodiversity Strategy⁶ was adopted in May 2011 in order to deliver 3.1 an established new Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.
- 3.2 Key messages from the National Planning Policy Framework (NPPF) include:
 - One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'
 - 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value[...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scape across local authority boundaries.'
 - 'Planning policies and decisions should contribute to and enhance the natural and local . environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.'
 - 'To protect and enhance biodiversity and geodiversity, plans should:
 - Identify, map and safeguard components of local wildlife-rich habitats and wider a) ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - Promote the conservation, restoration and enhancement of priority habitats, ecological b) networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.
- The Natural Environment White Paper (NEWP)⁷ sets out the importance of a healthy, functioning 3.3 natural environment to sustained economic growth, prospering communities and personal wellbeing. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of

⁶ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf> last accessed [27/06/18] ⁷ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf> last accessed [19/09/18]

our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.
- 3.4 Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'⁸.
- 3.5 The recently published 25 Year Environment Plan⁹ sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:
 - Using and managing land sustainably;
 - Recovering nature and enhancing the beauty of landscapes;
 - Connecting people with the environment to improve health and wellbeing;
 - Increasing resource efficiency, and reducing pollution and waste;
 - Securing clean, productive and biologically diverse seas and oceans; and
 - Protecting and improving the global environment.
- 3.6 In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the Biodiversity and Geodiversity SEA theme.
- 3.7 At the local level, policies within the 'Natural Environment' section of the Adopted Arun Local Plan (2011-2031) directly relate to the biodiversity and geodiversity SEA theme.

Baseline Summary

Summary of Current Baseline

European designated sites

3.8 There are no European designated sites located within the Neighbourhood Plan area. The nearest European designated sites, Pagham Harbour Ramsar Site and Special Protection Area (SPA) are located approximately 7km to the south west of the parish. However, part of the northern section of the Neighbourhood Plan overlaps with the 12km buffer zone for the

⁸ DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to download from: <<u>https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services> last accessed [19/0918]</u>

⁹ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-</u> <u>environment-plan.pdf</u> [accessed 19/09/18]

Singleton and Cocking Tunnels Special Area of Conservation¹⁰ (SAC), which supports populations of Barbastelle (*Barbastella barbastellus*) and Bechstein's bat (*Myotis bechsteinii*).

Nationally designated sites

Sites of Special Scientific Interest

- 3.9 There are two Sites of Special Scientific Interest (SSSI) located directly to the north of the Neighbourhood Plan area, namely: 'Halnaker Chalk Pit' SSSI and 'Eartham Pit, Boxgrove' SSSI.
- 3.10 Designated in February 1992 and covering an area of approximately 6.37 ha, Halnaker Chalk Pit SSSI consists of a partly vegetated pit in the Upper Chalk with peripheral areas of scrub and woodland. The SSSI is important as the joint location of the largest population of a nationally rare plant species in Great Britain. Specifically, the citation for the SSSI states¹¹:

"The floor of the chalk pit has a very thin layer of soil providing comparatively few nutrients. In addition, the chalk is freely draining and these factors combine to result in a relatively harsh environment. The pit is characterised by areas of bare chalk and a patchy stunted vegetation including such species as creeping bent grass (*Agrostis stolonifera*), hoary plantain (*Plantago media*) and scarlet pimpernel (*Anagallis arvensis*).

"This site is most significant for its population of the nationally rare and vulnerable broad-leaved cudweed (*Filago pyramidata*) with 10,000 plants (1990 figures) comprising approximately 50% of the total British population. The only other site with a comparable population is at Cuxton, Kent. This plant is typically found as a cornfield flower but as a result of modern agricultural practice has been almost extirpated. However, the chalk pit provides a sufficiently suitable habitat for the plant to reach a height of a few centimetres and seed freely. Other flowering plant species found on the pit floor include wild basil (*Clinopodium vulgare*) and wild parsnip (*Pastinaca sativa*)."

- 3.11 Based on the most recently completed condition assessments undertaken in 2011, 100% of the SSSI was classified as 'Favourable'.
- 3.12 Designated in March 1997 and covering an area of approximately 9.76 ha, Eartham Pit, Boxgrove SSSI is noted for its geological interest. Specifically, the citation for the SSSI states¹²:

"Interest at the site stems from the evidence for several climatic events shown by the nature of the deposits and the interglacial mammal fauna present within the intertidal sediments. In addition to this an important archaeological horizon has been identified on the surface of the intertidal deposits which would at one time have been a beach.

"The recent excavations at the site have suggested a pre-Hoxnian age for the site as opposed to the Hoxnian age normally associated with the raised shoreline in the area. The combination of archaeology and Middle-Pleistocene fauna at this site has important implications for Pleistocene and Palaeolithic chronology in Britain and Northern Europe.

"The excavations at Eartham Pit have yielded important climatic information for the MiddlePleistocene and are considered as internationally important due to the juxtaposition of the fossiliferous sediments with the archaeological evidence, particularly the human remains."

3.13 Based on the most recently completed condition assessments undertaken in 2011, 100% of the SSSI was classified as 'Favourable'.

¹⁰ JNCC (no date): 'Singleton and Cocking Tunnels SAC', [online] available to access via: <<u>https://sac.jncc.gov.uk/site/UK0030337</u>> last accessed [16/09/19]

¹¹ Natural England (no date): 'Halnaker Chalk Pit SSSI', [online] available to access via:

<<u>https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1006507</u>> last accessed [16/09/19] ¹² Natural England (no date): 'Earthham Pit, Boxgrove SSSI', [online] available to access via:

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s2000065> last accessed [16/09/19]

SSSI Impact Risk Zones

3.14 SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this regard, the Neighbourhood Plan area does not overlap with SSSI IRZs for the types of development which are likely to come forward (i.e. residential, rural residential, rural non-residential).

Locally important sites

- 3.15 Local Nature Reserves (LNR) may be established by Local Authorities in consultation with English Nature under Section 21 of the National Parks and Access to the Countryside Act 1949 and are habitats of local importance. Located directly to the south of the Neighbourhood Plan area, 'The Brookes (Bersted Brooks)' LNR was designated in July 2010 and covers an area of approximately 19.11 ha¹³. Primarily consisting of meadows, ponds, reed beds and riverine woodland, the LNR is regarded as a key habitat area supporting ecological connectivity of fauna and flora species.
- 3.16 There are two Sites of Nature Conservation Interest (SNCI) within the Neighbourhood Plan area, referred to in the Aldingbourne Evidence Base as Ar01 and Ar09:
 - Fontwell Racecourse (Ar01), covers an area of approximately 14.2 ha and comprises unimproved and species rich grassland which species-rich swards.
 - Slindon Bottom (Ar09), is a site of ancient and semi-natural woodland, conifers and mixed plantations including Pedunculate Oak (*Quercus robur*), Ash (*Fraxinus excelsior*) and Beech (*Fagus sylvatica*).
- 3.17 There are a variety of BAP Priority Habitats located within and within proximity to the Neighbourhood Plan area, including areas of coastal and floodplain grazing marsh, deciduous woodland, good quality and semi-improved grassland, lowland calcareous grassland, lowland fens, lowland meadows, and traditional orchard.
- 3.18 Requested by the Neighbourhood Plan Steering Group in September 2013, the Sussex Biodiversity Record Centre (SBRC) data for the parish of Aldingbourne confirms that there is a network of chalk streams within the northern half of the Neighbourhood Plan area (shown below in **Figure 3.0**). The SBRC report states the following¹⁴:

"All chalk streams are fed from groundwater aquifers which means they have clean, clear water and relatively stable water temperatures. These unique conditions along with their chalk geology, support a rich diversity of wildlife including important fish populations and many other specialist species. Sussex chalk streams often occur in small gulleys which are much more wooded than most other headwater chalk streams".

- 3.19 The SBRC report also states that the following key species are associated with chalk streams: Fool's Water-cress (*Apium nodiflorum*), Blunt-fruited Water-starwort (*Callitriche obtusangula*), Brook Water Crowfoot (*Ranunculus peltatus*), Lesser Water-parsnip (*Berula erecta*), Brown Trout (*Salmo trutta*), White-clawed Crayfish (*Austropotamobius pallipes*) and Southern Damselfly (*Coenagrion mercurial*).
- 3.20 Figure 3.1 (overleaf) shows the designated wildlife sites and BAP priority habitats located within and within proximity to the Neighbourhood Plan area.

¹³ Natural England (no date): 'The Brooks (Bersted Brooks) LNR', [online] available to access via:

<<u>https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1481372</u>> last accessed [16/09/19] ¹⁴ Sussex Biodiversity Records Centre (2013): 'Desktop Biodiversity Report: Land at Aldingbourne Parish', [online] available to access via: <<u>https://aldingbourne-pc.gov.uk/aldingbourne-parish-council/evidence-base-2016/</u>> last accessed [16/09/19]

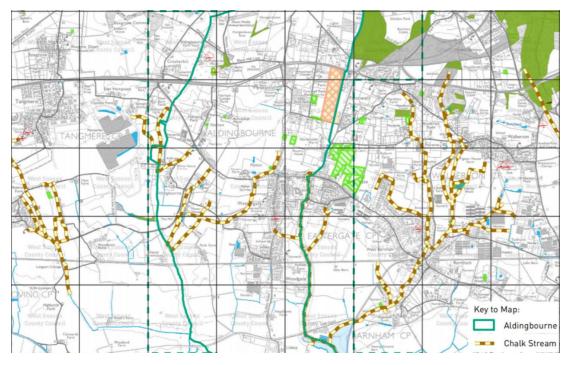


Figure 3.0: Location of chalk streams within the Neighbourhood Plan area (taken from the SBRC report)

Summary of Future Baseline

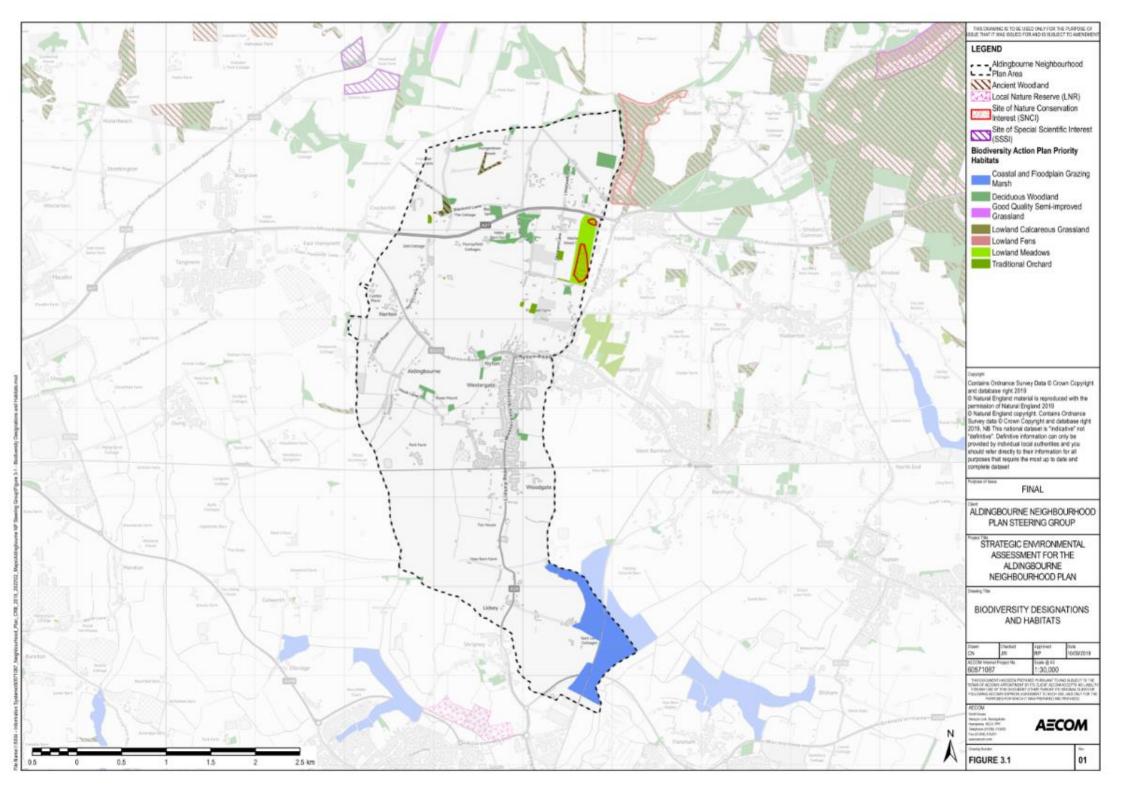
- 3.21 Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.
- 3.22 The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised both within the Neighbourhood Plan area and in the surrounding areas.

Key Sustainability Issues

- Part of the northern section of the Neighbourhood Plan overlaps with the 12km buffer zone for the Singleton and Cocking Tunnels Special Area of Conservation.
- There are two Sites of Special Scientific Interest (SSSI) located directly to the north of the Neighbourhood Plan area, namely: 'Halnaker Chalk Pit' SSSI and 'Eartham Pit, Boxgrove' SSSI.
- At the local level, 'The Brookes' (Bersted Brooks)' LNR, 'Fontwell Racecourse' SNCI and 'Slindon Bottom' SNCI are located either within or within proximity to the parish, containing habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC).
- There are a variety of BAP Priority Habitats located within and within proximity to the Neighbourhood Plan area, including areas of coastal and floodplain grazing marsh, deciduous woodland, good quality and semi-improved grassland, lowland calcareous grassland, lowland fens, lowland meadows, and traditional orchard.
- The Sussex Biodiversity Record Centre (SBRC) data for Aldingbourne confirms that there is a network of chalk streams within the northern half of the Neighbourhood Plan area.

What are the SEA objectives and appraisal questions for the Biodiversity and Geodiversity SEA theme?

| SEA objective | Assessment Questions | |
|---|---|--|
| Protect and enhance all biodiversity and geodiversity | Will the option/proposal help to: | |
| | • Support the integrity of the European designated sites located within proximity to the Neighbourhood Plan area? | |
| | • Support the status of the nationally and locally designated sites within and within proximity to the Neighbourhood Plan area? | |
| | Protect and enhance priority habitats and species, including those listed in the annexes of the European Habitats Directive and the European Birds Directive? | |
| | • Achieve a net gain in biodiversity? | |
| | Support enhancements to multifunctional green infrastructure networks? | |
| | • Support access to, interpretation and understanding of biodiversity and geodiversity? | |



4. Climate Change

Focus of Theme

- Contribution to climate change
- Effects of climate change
- Climate change adaption
- Flood risk

Policy Context

- 4.1 The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below¹⁵:
 - Flooding and coastal change risks to communities, businesses and infrastructure;
 - Risks to health, well-being and productivity from high temperatures;
 - Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
 - Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.
- 4.2 The UK Climate Change Act¹⁶ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.
- 4.3 The Climate Change Act includes the following:
 - 2050 Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
 - Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
 - The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.

 ¹⁵ GOV UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from:
 https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017> last accessed [20/09/18]
 ¹⁶ GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <http://www.legislation.gov.uk/ukpga/2008/27/contents> last accessed [19/09/18]

- The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page 17.
- 4.4 Key messages from the National Planning Policy Framework (NPPF) include:
 - One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'
 - 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'
 - 'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'
 - Direct development away from areas at highest risk of flooding (whether existing or future). 'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'
- 4.5 The Flood and Water Management Act¹⁸ highlights that alternatives to traditional engineering approaches to flood risk management include:
 - Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
 - Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
 - Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
 - Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
 - Creating sustainable drainage systems (SuDS).¹⁹
- 4.6 Further guidance is provided in the document 'Planning for SuDS'.²⁰ This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

¹⁷ Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<u>https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/</u>> last accessed [19/09/18]

¹⁸ Flood and Water Management Act (2010) [online] available at: <<u>http://www.legislation.gov.uk/ukpga/2010/29/contents></u> last accessed [19/09/18]

¹⁹ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

²⁰ CIRIA (2010) 'Planning for SuDs – making it happen' [online] available to access via

<http://www.ciria.org/Resources/Free publications/Planning for SuDS ma.aspx> last accessed [19/09/18]

4.7 At the local level, policies within the 'Design' section of the Adopted Arun Local Plan (2011-2031) directly relate to the climate change SEA theme.

Baseline Summary

Summary of Current Baseline

Contribution to climate change

4.8 In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that Arun has lower per capita emissions than West Sussex, the South East of England and England since 2005 (see **Table 4.1**). Arun has seen a 36.2% reduction in the percentage of total emissions per capita between 2005 and 2016, lower than the reductions for West Sussex (36.6%), the South East of England (36.7%) and England (37.6%).

| | Industrial and Commercial (t CO ₂) | Domestic (t CO ₂) | Transport (t CO ₂) | Total (t CO ₂) |
|-------------|--|----------------------------------|-----------------------------------|-------------------------------|
| Arun | | | | |
| 2005 | 1.7 | 2.5 | 1.7 | 5.8 |
| 2006 | 1.7 | 2.5 | 1.6 | 5.7 |
| 2007 | 1.6 | 2.4 | 1.6 | 5.4 |
| 2008 | 1.5 | 2.4 | 1.6 | 5.3 |
| 2009 | 1.3 | 2.2 | 1.5 | 4.8 |
| 2010 | 1.5 | 2.4 | 1.5 | 5.1 |
| 2011 | 1.3 | 2.1 | 1.5 | 4.5 |
| 2012 | 1.5 | 2.3 | 1.4 | 4.8 |
| 2013 | 1.4 | 2.2 | 1.4 | 4.6 |
| 2014 | 1.2 | 1.9 | 1.4 | 4.0 |
| 2015 | 1.1 | 1.8 | 1.5 | 3.9 |
| 2016 | 1.0 | 1.7 | 1.6 | 3.7 |
| West Sussex | | | | |
| 2005 | 2.5 | 2.6 | 2.4 | 7.1 |
| 2006 | 2.4 | 2.6 | 2.3 | 6.9 |
| 2007 | 2.4 | 2.5 | 2.3 | 6.7 |
| 2008 | 2.3 | 2.4 | 2.1 | 6.5 |
| 2009 | 2.1 | 2.2 | 2.1 | 5.9 |

²¹ Department of Energy and Climate Change (2018) 2005 to 2016 UK local and regional CO2 emissions – data tables [online] available at:: <<u>https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016</u>> [accessed 14/09/19]

| | Industrial and Commercial (t CO ₂) | Domestic (t CO ₂) | Transport (t CO ₂) | Total (t CO ₂) |
|------------|--|----------------------------------|-----------------------------------|-------------------------------|
| 2010 | 2.2 | 2.4 | 2.0 | 6.2 |
| 2011 | 2.0 | 2.0 | 2.0 | 5.6 |
| 2012 | 2.1 | 2.2 | 1.9 | 5.7 |
| 2013 | 1.9 | 2.1 | 1.9 | 5.5 |
| 2014 | 1.5 | 1.8 | 1.9 | 4.8 |
| 2015 | 1.6 | 1.7 | 1.9 | 4.8 |
| 2016 | 1.4 | 1.6 | 1.9 | 4.5 |
| South East | | | | |
| 2005 | 3.0 | 2.5 | 2.6 | 7.9 |
| 2006 | 3.0 | 2.5 | 2.6 | 7.8 |
| 2007 | 2.8 | 2.4 | 2.6 | 7.6 |
| 2008 | 2.7 | 2.4 | 2.4 | 7.3 |
| 2009 | 2.4 | 2.2 | 2.3 | 6.6 |
| 2010 | 2.4 | 2.3 | 2.3 | 6.8 |
| 2011 | 2.2 | 2.0 | 2.2 | 6.2 |
| 2012 | 2.2 | 2.2 | 2.2 | 6.3 |
| 2013 | 2.1 | 2.1 | 2.1 | 6.1 |
| 2014 | 1.7 | 1.7 | 2.2 | 5.4 |
| 2015 | 1.6 | 1.7 | 2.2 | 5.3 |
| 2016 | 1.4 | 1.6 | 2.2 | 5.0 |
| England | | | | |
| 2005 | 3.8 | 2.5 | 2.3 | 8.5 |
| 2006 | 3.8 | 2.5 | 2.2 | 8.4 |
| 2007 | 3.6 | 2.4 | 2.2 | 8.1 |
| 2008 | 3.5 | 2.4 | 2.1 | 7.8 |
| 2009 | 3.0 | 2.1 | 2.0 | 7.0 |
| 2010 | 3.0 | 2.3 | 2.0 | 7.2 |
| 2011 | 2.7 | 2.0 | 1.9 | 6.5 |
| 2012 | 2.9 | 2.1 | 1.9 | 6.8 |
| | | | | |

| | Industrial and Commercial (t CO ₂) | Domestic (t CO ₂) | Transport (t CO ₂) | Total (t CO ₂) |
|------|--|----------------------------------|-----------------------------------|-------------------------------|
| 2013 | 2.8 | 2.0 | 1.9 | 6.6 |
| 2014 | 2.4 | 1.7 | 1.9 | 5.9 |
| 2015 | 2.3 | 1.6 | 1.9 | 5.7 |
| 2016 | 2.0 | 1.5 | 1.9 | 5.3 |

Potential effects of climate change

- 4.9 The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team²². UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.
- 4.10 As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile) for South East England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows²³:
 - The central estimate of increase in annual mean temperatures of between 2°C and 3°C; and
 - The central estimate of change in annual mean precipitation of +20 to +30% in winter and -10% to -20% in summer.
- 4.11 Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:
 - Increased incidence of heat related illnesses and deaths during the summer;
 - Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
 - Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
 - Increase in health problems related to rise in local ozone levels during summer;
 - Increased risk of injuries and deaths due to increased number of storm events;
 - Effects on water resources from climate change;
 - Reduction in availability of groundwater for abstraction;
 - Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
 - Increased risk of flooding, including increased vulnerability to 1:100-year floods;
 - Changes in insurance provisions for flood damage;
 - A need to increase the capacity of wastewater treatment plants and sewers;
 - A need to upgrade flood defences;
 - Soil erosion due to flash flooding;

²² The data was released on 26th November 2018: See: <<u>http://ukclimateprojections.metoffice.gov.uk/</u>> last accessed [14/09/19]

²³ Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via:
<<u>https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps</u>
last accessed [14/09/19]

- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;
- Increased difficulty of food preparation, handling and storage due to higher temperatures;
- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Flood risk

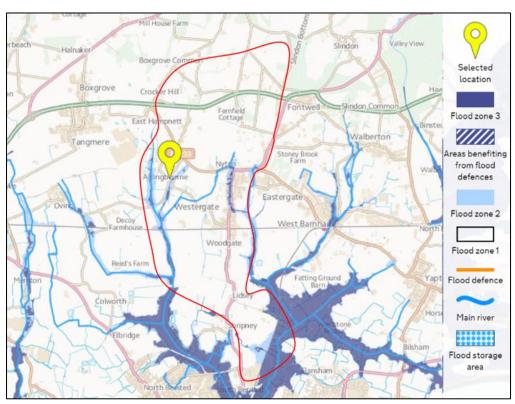


Figure 4.1 Fluvial flood risk within the Neighbourhood Plan area²⁴

4.12 Sections of Oving Road and Hook Lane in the settlement of Aldingbourne partly fall within Flood Zone 3, with a corridor of land covering the western section of the settlement between St Mary's Church and Church Road also within Flood Zone 3. These areas have a 1% (1 in 100) or greater annual flood risk. Figure 4.1 (above) displays the flood risk areas present in the Neighbourhood Plan area. Completed in 2014 by Aldingbourne Parish Council, '*The Flood Risk Implications of Strategic Development at Barnham / Eastergate / Westergate*' highlights the Neighbourhood Plan area is a Coastal Plain extending from the foot of the South Downs to the current sea coast²⁵.

²⁴ GOV UK (2019): 'Flood Map for Planning', [online] available at: <<u>https://flood-map-for-planning.service.gov.uk/</u>> [accessed 06/09/19]

²⁵ Aldingbourne Parish Council (2014) 'The Flood Risk Implications of Strategic Development at Barnham / Eastergate / Westergate'. [online] available at <u>https://aldingbourne-pc.gov.uk/media/4290/raa_bew_flood_risk_report_part_1_2.pdf</u> [accessed 16/09/19]

- 4.13 Additional areas with the highest risk of flooding in the Neighbourhood Plan area include areas of land surrounding the coastal and floodplain grazing marshes. These habitats are near the Brookes LNR and connect to streams that feed into the Aldingbourne Rife, which passes from north to south along the western section of the Neighbourhood Plan area and into the Bilsham Rife and the Lidsey Rife (to the south east).
- 4.14 The West Sussex Local Flood Risk Management Strategy gives an overview of sources of flooding in the West Sussex area²⁶. In the Arun District the main source of fluvial flooding is the River Arun, Aldingbourne Rife and Ferring Rife. The strategy estimates around 495 properties are at risk of surface water and coastal flooding combined across Aldingbourne, Westergate and Eastergate.
- 4.15 Completed in 2016, the Arun District Council Strategic Flood Risk Assessment highlights that there has been a series of flooding events in the Neighbourhood Plan area, with the most significant in 1993, 2000 to 2001 and 2002 to 2003 after heavy rainfall over an extensive period. However, the most significant flood event directly within the Neighbourhood Plan area was in February 2014, where approximately 8 properties were flooded in Aldingbourne along Northfield Lane. The report also highlights that there are areas within the Neighbourhood Plan currently within Flood Zone 2 may become part of Flood Zone 3a in the future due to the effects of climate change²⁷.

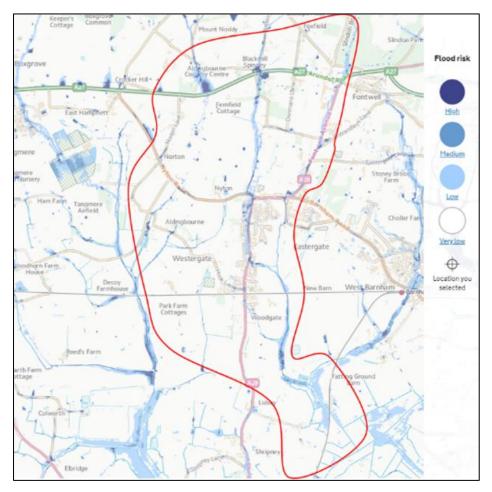


Figure 4.2 Surface water flood risk within the Neighbourhood Plan area²⁸

²⁷ Arun District Council (2016) 'Strategic Flood Risk Assessment', [online] available at:

information.service.gov.uk/long-term-flood-risk/map> last accessed [30/08/19]

²⁶ West Sussex County Council (2014) 'West Sussex Local Flood Risk Management Strategy (2013-2018)', [online] available at:
<<u>https://www.westsussex.gov.uk/media/1595/local_flood_risk_management_strategy.pdf</u>> [accessed 17/09/19]

https://www.arun.gov.uk/download.cfm?doc=docm93iijm4n9414.pdf&ver=9270 [accessed 16/09/19]

²⁸ Environment Agency (2019): 'Long term flood risk map' [online] available to access via: <<u>https://flood-warning-</u>

4.16 Surface water flooding is a risk within the Neighbourhood Plan area (**Figure 4.2**), with a low-tomedium risk of flooding from the Aldingbourne Rife surrounding Westergate and Woodgate and a high risk in the north of the Neighbourhood Plan along the A27 Arundel Road.

Summary of Future Baseline

- 4.17 Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.
- 4.18 In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars and busses. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

Key Sustainability Issues

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in Aldingbourne.
- Arun has seen a 36.2% reduction in the percentage of total emissions per capita between 2005 and 2016, lower than the reductions for West Sussex (36.6%), the South East of England (36.7%) and England (37.6%).
- Sections of Oving Road and Hook Lane in the settlement of Aldingbourne partly fall within Flood Zone 3, with a corridor of land covering the western section of the settlement between St Mary's Church and Church Road also within Flood Zone 3.
- Completed in 2016, the Arun District Council Strategic Flood Risk Assessment highlights that there has been a series of flooding events in the Neighbourhood Plan area.
- The West Sussex Local Flood Risk Management Strategy estimates around 495 properties are at risk of surface water and coastal flooding combined across Aldingbourne, Westergate and Eastergate.
- Surface water flooding is a risk within the Neighbourhood Plan area, with a low-to-medium risk of flooding from the Aldingbourne Rife surrounding Westergate and Woodgate and a high risk in the north of the Neighbourhood Plan along the A27 Arundel Road.

What are the SEA objectives and appraisal questions for the Climate Change SEA theme?

| SEA objective | Assessment Questions | |
|---|--|--|
| Reduce the contribution to | Will the option/proposal help to: | |
| climate change made by activities within the | Reduce the number of journeys made? | |
| Neighbourhood Plan area | Reduce the need to travel? | |
| | Promote the use of sustainable modes of transport, including walking, cycling and public transport? | |
| | Increase the number of new developments meeting or exceeding sustainable design criteria? | |
| | Generate energy from low or zero carbon sources? | |
| | Reduce energy consumption from non-renewable resources? | |
| Support the resilience of | Will the option/proposal help to: | |
| the Neighbourhood Plan area to the potential effects of climate change, including flooding | • Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change? | |
| | • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? | |
| | Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? | |
| | • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? | |
| | Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? | |

5. Landscape

Focus of Theme

- Internationally and nationally protected landscapes
- Landscape and townscape character and quality
- Designated and non-designated sites and areas
- Visual amenity

Policy Context

- 5.1 Key messages from the National Planning Policy Framework (NPPF) include:
 - 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.'
 - Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'
 - Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).'
 - 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - *i.* protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils
 - ii. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
 - *iii.* remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'
- 5.2 As listed within the South Downs National Park Partnership Management Plan, the general policies for conservation for this nationally protected landscape are as follows²⁹:
 - Policy 1: Conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.
 - Policy 2: Develop landscape-scale partnerships and initiatives to focus on enhancing the key ecosystem services delivered by the National Park.
 - Policy 3: Protect and enhance tranquillity and dark night skies.
 - Policy 4: Create more, bigger, better-managed and connected areas of habitat in and around the National Park, which deliver multiple benefits for people and wildlife.

²⁹ South Downs National Park Authority (2013) 'South Downs National Park Partnership Management Plan', [online] available at: <u>https://www.southdowns.gov.uk/wp-content/uploads/2015/01/SDNP-Partnership-Management-Plan-2014-19.pdf</u> [accessed 16/09/19]

- Policy 5: Conserve and enhance populations of priority species in and around the National Park, delivering targeted action where required.
- Policy 6: Favour natural functions and processes in and around the National Park where they support the value and resilience of terrestrial, freshwater, marine, coastal and estuarine habitats.
- Policy 7: Actively promote more joined-up and sustainable management of the coast, including the defined area of the Sussex Heritage Coast, through Integrated Coastal Zone Management (ICZM).
- Policy 8: Focus the prevention, control and eradication of invasive non-native species on those that are most harmful to biodiversity.
- Policy 9: The significance of the historic environment is protected from harm, new discoveries are sought and opportunities to reveal its significance are exploited.
- Policy 10: Improve the management of heritage assets, particularly focusing on those that are 'at risk', including from crimes against heritage.
- 5.3 At the local level, policies within the 'Settlement Structure & Green Infrastructure' section and the 'Natural Environment' sections of the Adopted Arun Local Plan (2011-2031) directly relate to the landscape SEA theme:

Baseline Summary

Summary of Current Baseline

South Downs National Park

- 5.4 Designated in 2009 and covering an area of approximately 1653 km², the South Downs National Park overlaps with the northern section of the Neighbourhood Plan area. The South Downs National Park Authority highlight the following special characteristics:
 - Diverse, inspirational landscapes and breathtaking views;
 - A rich variety of wildlife and habitats including rare and internationally important species;
 - Tranquil and un-spoilt places;
 - An environment shaped by centuries of farming and embracing new enterprise;
 - Great opportunities for recreational activities and learning experiences;
 - Well-conserved historical features and a rich cultural heritage; and
 - Distinctive towns and villages, and communities with real pride in their area.

National Character Areas

- 5.5 National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to their character. The Neighbourhood Plan area is within the South Coast Plain NCA, with land directly to the north of the Neighbourhood Plan area located within the South Downs NCA. The NCA profile for the 'South Coast Plain'³⁰ lists several key characteristics, with the following of relevance to the Neighbourhood Plan area:
 - The underlying geology of flinty marine and valley gravels extends for several miles inland to the dip slope of the South Downs and the South Hampshire Lowlands. This gives rise to deep and well-drained high-quality soils;

³⁰ Natural England (2014): 'NCA Profile: 126 South Coast Plain (NE525)', [online] available to download via: <<u>http://publications.naturalengland.org.uk/publication/4923911250640896?category=587130</u>> last accessed [19/08/19]

- In places, streams and rivers flow from the higher land of the Downs to the sea;
- There are stretches of farmed land between developed areas, often with large arable fields defined by low hedges or ditches; and
- Along the exposed, open coastal plain and shoreline, tree cover is limited to isolated windsculpted woodlands and shelterbelts.
- 5.6 Implemented in October 2005 by West Sussex County Council, the 'Strategy for the West Sussex Landscape'³¹ aims to protect and enhance the landscape as an asset for future generations, outlining visions for the five national character areas (NCAs) which characterise the county. In the context of the Neighbourhood Plan area, the vision statements for the 'South Coast Plan' are to ensure that:
 - High-quality new development is well-integrated with existing towns and the wider landscape;
 - The urban fringe combines a distinctive landscape character (including a combination of open spaces, woodlands, and hedgerows) with well-managed land uses which benefit residents and visitors in town and country alike;
 - A strong network of woodlands and hedgerows forms green corridors within the gaps between the coastal towns, providing informal recreational opportunities and helping to connect the towns and their residents within the wider landscape;
 - Productive farmland and permitted horticultural uses are set within a strong landscape framework of woodlands, shelterbelts and hedgerows. Agriculture adopts sympathetic farming and land management methods, contributing to landscape renewal and biodiversity, including conserving wetlands and pastureland;
 - Extensive new areas of mudflats, salt marsh and coastal grazing marsh are established within coastal inlets, as an important part of coastal retreat schemes;
 - The historic and inspiring long views so characteristic of the coastal plain, to Chichester Cathedral and its downland backdrop, to other church towers and spires, to Arundel and its castle and cathedral, and from the coast to the downs, are maintained; and
 - The local distinctiveness of villages and their settings continues to be evident, with a return to the greater availability and use of traditional local materials.

Local Landscape Character

- 5.7 Landscape character plays an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape character can assist in the assessment of the likely significance of effects of change resulting from development and the value of landscape, both in visual and amenity terms.
- 5.8 Completed in 2006, the Arun Landscape Study identifies landscape types and areas at an appropriate scale to understand the localised variation in character with the objective of providing the framework for the assessment of sensitivity, value and capacity. The Study classifies the Neighbourhood Plan area into seven distinctive Landscape Character Areas (LCA), shown below in **Figure 5A** and followed by a summary of their key characteristics, sensitivities and capacities.

³¹ West Sussex County Council (2005): 'Strategy for the West Sussex Landscape', [online] available to download via: <<u>https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/</u>> last accessed [19/08/19]

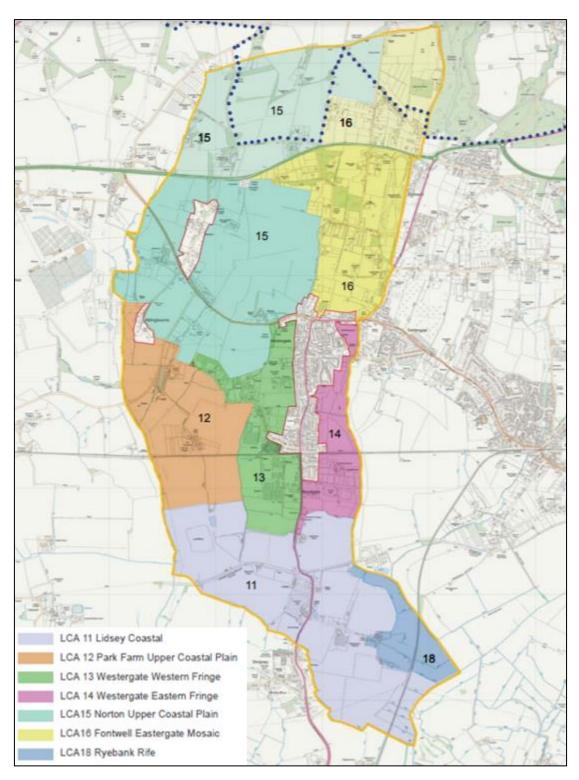


Figure 5A: LCAs within the Neighbourhood Plan area, taken from the Landscape Appraisal³²

- LCA 11: Lidsey Coastal: Rural arable landscape, some ecological and heritage value provides separation between Shripney and Westergate. Landscape Sensitivity – Substantial; Landscape Capacity – Low.
- LCA 12: Park Farm Upper Coastal Plain: Almost entirely arable fields of varying size, with the area broken up by railway and road. Landscape Sensitivity Substantial; Landscape Capacity Low.

³² Aldingbourne Parish Council (2016) 'Neighbourhood Development Plan Landscape Appraisal', [online] available at: <u>https://aldingbourne-pc.gov.uk/media/4296/adc_landscape_study_appraisal.pdf</u> [accessed 16/09/19]

- LCA 13: Westergate Western Fringe: Patchwork of urban edge land uses, contained by boundary vegetation, on upper coastal plain adjacent to existing settlement. Landscape Sensitivity Moderate; Landscape Capacity Medium / High.
- LCA 14: Westergate Eastern Fringe: Mixed urban edge uses adjacent to settlement but on valley side and open to wider landscape, part of separation between Westergate and Barnham. Landscape Sensitivity Substantial; Landscape Capacity Low / Medium.
- LCA 15: Norton Upper Coastal Plain: Enclosed rural landscape unrelated to settlement with heritage value. Landscape Sensitivity Substantial; Landscape Capacity Low.
- LCA 16: Fonntwell Eastergate Mosaic: Small scale landscape, area contains ancient woodland, ecological and heritage interest and Fontwell Racecourse. Provides separation between Westergate and Barnham. Landscape Sensitivity – Moderate; Landscape Capacity – Medium.
- LCA 18: Ryebank Rife: Rural rife landscape in floodplain, some ecological interest. Landscape Sensitivity Substantial; Landscape Capacity Low / Medium
- 5.9 Reflecting the results of the Landscape Study, five out of the seven LCAs either have a 'low' or 'low to medium' capacity for change. Additionally, six out of the seven LCAs have been classified as having a 'substantial' landscape sensitivity.

Tree Preservation Orders

- 5.10 Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity'; the local planning authority will likely take into consideration the following criteria³³:
 - Visibility: the extent to which the trees or woodlands can be seen by the public; and
 - Individual, collective and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.
- 5.11 In this context, Arun District Council have allocated several TPOs within the Neighbourhood Plan area, shown below in **Figure 5B** and **Figure 5C**, represented by a red crosshatch section³⁴.

 ³³ GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via: <<u>https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas</u>> last accessed [16/04/19]
 ³⁴ Arun District Council (2019) Tree Preservation Orders GIS Map. [online] available to access via: <u>https://www1.arun.gov.uk/webapps/wml/</u> last accessed [16/09/19]

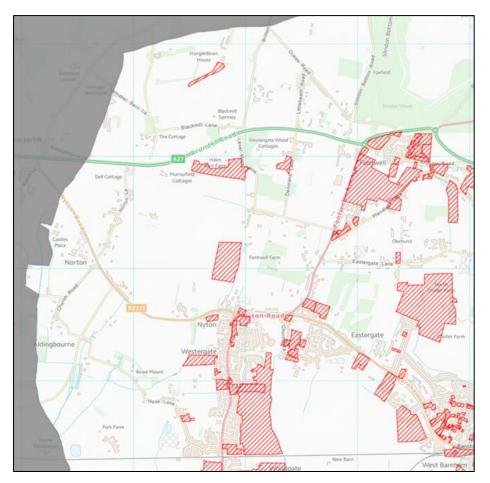


Figure 5B: TPOs in the northern half of the Neighbourhood Plan area



Figure 5C: TPOs in the southern half of the Neighbourhood Plan area

Visual Amenity

- 5.12 The views across the Parish are an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change can see these views degraded overtime.
- 5.13 Figure 5.1 (overleaf) shows the landscape designations within the Neighbourhood Plan area.

Summary of Future Baseline

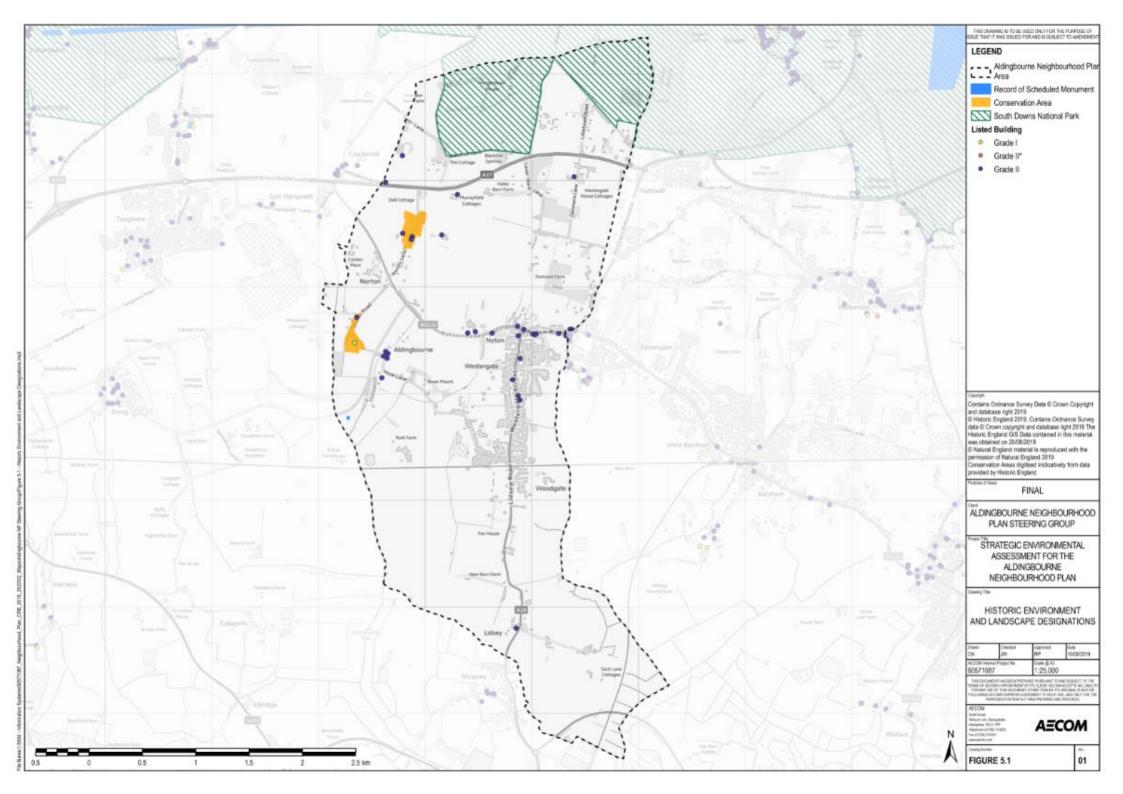
- 5.14 New development has the potential to lead to incremental but small changes in landscape and villagescape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.
- 5.15 In the absence of the plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character and setting of the Neighbourhood Plan area, along with the special qualities of the South Downs National Park and the seven LCAs.

Key Sustainability Issues

- The South Downs National Park overlaps with the northern section of the Neighbourhood Plan area, containing several special qualities which classify its distinctiveness and value.
- There are seven LCAs within the Neighbourhood Plan area, with the Arun Landscape Study outlining several key features which contribute to their distinctiveness.
- Reflecting the results of the Landscape Study, five out of the seven LCAs either have a 'low' or 'low to medium' capacity for change. Additionally, six out of the seven LCAs have been classified as having a 'substantial' landscape sensitivity.
- Arun District Council have allocated serval Tree Preservation Orders in the Neighbourhood Plan area in the interest of their amenity value.
- The views across the Neighbourhood Plan area are an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.

What are the SEA objectives and appraisal questions for the Landscape SEA theme?

| SEA objective | Assessment Questions | |
|---|--|--|
| Protect and enhance the character and quality of landscapes and villagescapes. | Will the option/proposal help to: | |
| | Conserve and enhance the natural beauty and special qualities of the South Downs National Park, in line with the Partnership Management Plan and Local Plan? | |
| | • Conserve and enhance locally important landscape and villagescape features within the Neighbourhood Plan area, including the seven LCAs and TPOs? | |
| | Conserve and enhance local diversity and character? | |
| | Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area? | |



6. Historic Environment

Focus of Theme

- Designated and non-designated heritage assets
- Setting, special qualities and significance of heritage assets
- Locally important heritage assets
- Historic character of the Neighbourhood Plan area

Policy Context

- 6.1 Key messages from the National Planning Policy Framework (NPPF) include:
 - 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.
 - Plans should set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
 - 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.'
- 6.2 The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's "A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Landscape and Historic Environment SEA theme.
- 6.3 The Government's Statement on the Historic Environment for England³⁵ sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.
- 6.4 Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.
- 6.5 Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016)³⁶ outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

³⁵ HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at:
<<u>http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx</u>> last
accessed [20/0918]

³⁶ Historic England (2016): 'Conservation Area Designation, Appraisal and Management: Advice Note 1', [online] available to download via: <<u>https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/</u>> last accessed [11/12/18]

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.
- 6.6 Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)³⁷ provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.
- 6.7 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)³⁸ provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:
 - Step 1: Identify which heritage assets and their settings are affected;
 - Step 2: Asses the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
 - Step 5: Make and document the decision and monitor outcomes.
- 6.8 Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)³⁹ outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant of issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.
- 6.9 At the local level, policies within the 'Building Conservation & Archaeological Heritage' section of the Adopted Arun Local Plan (2011-2031) directly relate to the historic environment SEA theme.

Baseline Summary

Summary of Current Baseline

Historic Character of Aldingbourne

6.10 Dating back to the Roman times, the settlement within Aldingbourne is based around an area close to the Rife (*'bourne'*) on the western boundary of the Neighbourhood Plan area. The parish church of St Mary's formed the centre of Aldingbourne parish and it was here that the settlement initially grew. Hook Lane was the meandering cattle track joining the settlements of Aldingbourne and Westergate, with various footpaths also connecting Westergate with the parish Church and the hamlet of Woodgate.

³⁷ Historic England (2016): 'SA and SEA: Advice Note 8' [online] available to download via:

<<u>https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</u>> last accessed [11/12/18] ³⁹ Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to download via: <<u>https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/</u>> last accessed [11/12/18]

<<u>https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</u>> last accessed [11/12/18]

³⁸ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition', [online] available to download via:

- 6.11 Westergate is characterised by a diversity of housing types, including small apartment blocks, Edwardian terraces, semi and detached houses from Victorian to modern, small modern estates and former Council housing. This is intermingled with old farmhouses and thatched cottages from the original dairy farming era (some are of Tudor origin).
- 6.12 The Brighton to Portsmouth South Coast railway was built in 1846, there was a station at Woodgate, which served as Bognor's station until the opening of the branch line from Barnham junction to Bognor in 1864, when Woodgate Station was then closed.
- 6.13 There is little woodland in the parish, but due to the necessity for land drainage, many ditches remain. These are usually lined with hedgerows containing mature hedgerow trees, often of oak and ash. In recent years there has been an increase in small parcels of land being used for equestrian purposes, in addition to the establishment of unauthorised mobile home/caravan sites in rural parts of the parish.

Designated Heritage Assets

Listed Buildings

6.14 Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains 30 Grade II and one Grade I nationally designated listed buildings which are protected through the Listed Buildings and Conservation Areas Act 1990. The Grade I listed building is 'The Parish Church of St Mary' which was designated in 1958.

Scheduled Monuments

6.15 Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England⁴⁰, there is one scheduled monument within the Neighbourhood Plan area, namely: 'The Keep of Tote Copse castle; 400m north of Decoy Farmhouse'. The scheduled monument includes part of the buried remains of Tote Copse castle and was designated in 1955.

Conservation Areas

- 6.16 Conservation Areas are designated because of their special architectural and historic interest. Conservation Area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England⁴¹. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area and can be developed into a management plan. In this context, there are two designated conservation areas within the Neighbourhood Plan area: 'Church Road' and 'Norton Lane' (further discussed below). Additionally, the Neighbourhood Plan Steering Group are proposing a new conservation area at the northern end of Hook Lane and Park Lane due to the heritage interest of the five listed buildings and the scheduled monument which are within and within the setting of the proposed area.
- 6.17 Church Road is the main road running through the parish. The Conservation Area contains two listed buildings, St Mary's Church (Grade 1) and Aldingbourne Lodge (Grade II), and comprises an attractive, historic, self-contained and linear group of buildings in an open rural setting. The unobstructed open views from Oving Road and the approach road (Church Road) into the settlement are particularly impressive, enhanced by the pale colour wash of most of the

⁴⁰ Historic England: National Heritage List for England: [online] available at <<u>http://list.historicengland.org.uk</u>> last accessed [22/0919]

⁴¹ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to download from: <<u>https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/</u>> last accessed [20/09/18]

buildings. The mixtures of plain clay and slate roofs, together with chimneys, are important features⁴². The following opportunities for enhancement are noted:

- Overhead telephone / power lines re-routed underground;
- Replacement of modern joinery with joinery of more traditional design to the street elevations of 10-12, 18 and 20-22 Church Road; and
- Use of interior rather than exterior television aerials.
- 6.18 Norton is a small rural settlement lying to the south of the A27 between Tangmere and Fontwell. There is a variety in building form, style, age and materials. Some of the larger buildings within the Norton Lane Conservation Area e.g. Norton House and East Norton House are set well back in their own extensive grounds. There is brick and flint boundary walling of various heights within the conservation area, along with mature hedges, trees and verges. A series of gentle curves in Norton Lane provide a pleasant and attractive sense of enclosure. Additionally, the open spaces between Letterbox Cottage and Norton Grange Farm contribute to the rural character and setting of the settlement. The agricultural basis of the settlement is reflected in surviving farming estate cottages, a farmhouse and two working farms⁴³. The following opportunities for enhancement are noted:
 - Overhead telephone / power lines re-routed underground;
 - When appropriate, release asbestos clast farm buildings at East Norton and Norton Grange Farm with buildings clad in appropriately coloured material; and
 - Use of interior rather than exterior television aerials.
- 6.19 It is important to note that conservation area appraisals have not been prepared for 'Church Road' and 'Norton Lane' therefore it is not currently possible to gain an in-depth understanding of the special interest of the areas.

Heritage at Risk

- 6.20 Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2018 Heritage at Risk Register for South East England⁴⁴ none of the heritage assets within or adjacent to the Neighbourhood Plan area considered to be 'at risk',
- 6.21 However, it is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether the two Grade II listed buildings within the Neighbourhood Plan are at risk.
- 6.22 Figure 5.1 (above) shows the location of the scheduled monuments, listed buildings, registered park and garden, and conservation area within the Neighbourhood Plan area.

Locally Important Heritage Features

6.23 It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings in the area are likely to be of value for local people.

⁴² Aldingbourne Parish Council, Church Road Conservation Area [online] available at: <u>https://aldingbourne-pc.gov.uk/about-aldingbourne/church-road-conservation-area/</u> last accessed [16/09/19]

⁴³ Aldingbourne Parish Council, Norton Lane Conservation Area [online] available at: <u>https://aldingbourne-pc.gov.uk/about-aldingbourne/norton-lane-conservation-area/</u> last accessed [22/0819]

⁴⁴ Historic England (2018): 'Heritage at Risk Register for South East England', [online] available to download at: <<u>https://historicengland.org.uk/images-books/publications/har-2018-registers/</u>> last accessed [02/09/19]

6.24 Following a high-level review of the Historic Environmental Record (HER) for West Sussex (accessed via the Heritage Gateway)⁴⁵, there are 89 records within Aldingbourne Parish including several Neolithic sites, Roman artefacts and roads, Palaeolithic sites, Iron Age pottery and a large number of distinctive buildings which contribute to the character and setting of the surrounding areas.

Summary of Future Baseline

- 6.25 New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.
- 6.26 Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' heritage significance.

Key Sustainability Issues

- The Neighbourhood Plan area contains 30 Grade II and one Grade I nationally designated listed buildings which are protected through the Listed Buildings and Conservation Areas Act 1990. It is currently not possible to determine whether the Grade II listed buildings are 'at risk'.
- There is one scheduled monument within the Neighbourhood Plan area, namely: 'The Keep of Tote Copse castle; 400m north of Decoy Farmhouse'.
- The Neighbourhood Plan area contains two designated conservation areas: 'Church Road' and 'Norton Lane', which contain several features which contribute to their distinctiveness.
- Conservation Area Appraisals have not been prepared for 'Church Road' and 'Norton Lane' therefore it is not currently possible to gain an in-depth understanding of the special interest of the areas.
- The Neighbourhood Plan Steering Group are proposing a new conservation area at the northern end of Hook Lane and Park Lane due to the heritage interest of the five listed buildings and the scheduled monument which are within and within the setting of the area.
- The HER for West Sussex contains records of 89 locally important heritage features located wholly or partly within the Neighbourhood Plan area.

⁴⁵ Heritage Gateway (2019): Historic Environmental Record for West Sussex', [online] available to access via:
<u>http://www.heritagegateway.org.uk/gateway/</u>> last accessed [02/09/19]

What are the SEA objectives and appraisal questions for the Historic Environment SEA theme?

| SEA objective | Assessment Questions | |
|---|--|--|
| Protect, conserve and enhance heritage assets within the Neighbourhood Plan area | Will the option/proposal help to: | |
| | Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non- designated, and their setting? | |
| | Conserve and enhance the special interest, character and appearance of locally important features and their settings? | |
| | Support the integrity of the historic setting of key buildings of cultural heritage interest as listed on the HER? | |
| | • Support access to, interpretation and understanding of the historic evolution and character of the environment? | |
| | Conserve and enhance archaeological remains, including historic landscapes? | |
| | • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? | |

7. Land, Soil and Water Resources

Focus of Theme

- Quality of agricultural land
- Water resources and water quality
- Mineral safeguarding areas

Policy Context

- 7.1 The EU's Soil Thematic Strategy⁴⁶ presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.
- 7.2 Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:
 - Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
 - Promote the sustainable use of water;
 - Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances;
 - Ensure the progressive reduction of groundwater pollution; and
 - Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.
- 7.3 Key messages from the NPPF include:
 - 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - *i.* protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and
 - ii. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'
 - Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
 - 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'

⁴⁶ European Commission (2006) Soil Thematic Policy [online] available at: <<u>http://ec.europa.eu/environment/soil/index_en.htm</u>> last accessed [29/06/18]

- 'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'
- Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.
- 7.4 Along with the policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste', Goal 2 'Clean and plentiful water', Goal 5 'Using resources from nature more sustainably and efficiently' and Goal 8 'Minimising waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Land, Soil and Water Resources SEA theme.
- 7.5 Other key documents at the national level include Safeguarding our Soils: A Strategy for England⁴⁷, which sets out a vision for soil use in England, and the Water White Paper⁴⁸, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England⁴⁹ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.
- 7.6 In terms of waste management, the Government Review of Waste Policy in England⁵⁰ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.
- 7.7 The National Waste Management Plan⁵¹ provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive⁵². This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.
- 7.8 At the local level, policies within the 'Soils, Horticultural and Equine Development' section, 'Water' section, 'Natural Resources & Minerals Safeguarding' section and 'Waste Management' section of the Adopted Arun Local Plan (2011-2031) directly relate to the land, soil and water resources SEA theme.

⁴⁷ Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from:

<<u>https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england</u>> last accessed [20/09/18] ⁴⁸ Defra (2011) Water for life (The Water White Paper) [online] available at <<u>http://www.official-</u>

documents.gov.uk/document/cm82/8230/8230.pdf> last accessed [20/09/18]

⁴⁹ Defra (2011) Government Review of Waste Policy in England [online] available at:

<<u>http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf</u>> last accessed [20/09/18] ⁵⁰ DEFRA (2011) Government Review of Waste Policy in England [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-wastepolicy-review110614.pdf [accessed 01/03/19]

⁵¹ DEFRA (2013) Waste Management Plan for England [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-wastemanagement-plan-20131213.pdf [accessed 01/03/19]

⁵² Directive 2008/98/EC

Baseline Summary

Summary of Current Baseline

Soil Resources

- 7.9 The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.
- 7.10 In terms of the location of the best and most versatile agricultural land, a recent detailed agricultural land classification has been undertaken in some parts of the Neighbourhood Plan area. This identifies areas of Grade 1, Grade 2, and some Grade 3a⁵³ agricultural land in the parish, including the south. Significantly, there are also areas of land classified as Grade 1 and Grade 2 land located in the immediate vicinity of Westergate.
- 7.11 In terms of areas of the parish which have not had recent detailed agricultural land classification undertaken, the Provisional Agricultural Land Quality dataset⁵⁴ is a national dataset of very low resolution and may not necessarily provide an accurate reflection of the agricultural land quality. However, based on the results of the 'Predictive BMV Land Assessment'⁵⁵, more than 60% of the areas in Aldingbourne have a high likelihood of containing BMV land (aligning to the trends in the national dataset).

Water Resources

- 7.12 The main watercourse flowing through the Neighbourhood Plan is the Aldingbourne Rife, which flows from north to south, where the watercourse eventually drains into the Sussex TRaC.
- 7.13 The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination. In this regard, the Neighbourhood Plan area is within the 'Aldingbourne Rife' Surface Water NVZ. However, it is useful to note that as the Neighbourhood Plan is likely to allocate land for residential development and potential employment areas, such uses are not considered to increase the risk of pollution to the NVZ.

Water Quality

- 7.14 Aldingbourne is located within the South East River Basin District, overlapping with the 'Arun and Western Streams' Management Catchment and the 'Western Streams' Operational Catchment. There are eight water bodies within the Operational Catchment, one of which passes through the Neighbourhood Plan area: Aldingbourne Rife.
- 7.15 Based on the most recently completed water quality assessments undertaken in 2016, the Environment Agency's Catchment Data Explorer⁵⁶ classifies the Aldingbourne Rife as having a 'good' chemical status and a 'poor to moderate' ecological status. The reasons for not

<<u>http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736</u>> last accessed [22/08/19] ⁵⁵ Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East', [online] available to access via:

⁵³ Aldingbourne Parish Council (2015) Agricultural Land Classification Map produced from magic (2015) available to download via: ">https://aldingbourne-pc.gov.uk/aldingbourne-parish-council/evidence-base-2016/> [17/09/19]

⁵⁴ Natural England (2018) Agricultural Land Classification map London and the South East (ALC007) [online] available at:

<<u>http://publications.naturalengland.org.uk/publication/6056482614804480?category=5208993007403008</u>> last accessed [19/08/19]

⁵⁶ Environment Agency (2019): 'Catchment Data Explorer', [online] available to access via: <<u>https://environment.data.gov.uk/catchment-planning/</u>> [accessed 22/08/19]

achieving good status (RNAGs) are primarily attributed to the following activities: sewage discharge, poor soil/nutrient management, groundwater abstraction, transport/land drainage and contaminated land.

Mineral Resources

- 7.16 Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country's prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance⁵⁷.
- 7.17 Adopted in July 2018, the Joint Minerals Local Plan⁵⁸ covers the period to 2033 and provides the basis for making consistent decisions about planning applications for mineral activities throughout the county. Appendix E confirms the location of the five mineral safeguarding areas (MSAs) throughout West Sussex, which includes: Sharp Sand and Gravel, Soft Sand (including potential Silica Sand), Brick Clay Resource, Chalk, and Building Stone. In this context, the Neighbourhood Plan area likely overlaps with the Sharp Sand and Gravel MSA. However, it is difficult to be certain due to the scale of the map presented within Appendix E.

Summary of Future Baseline

- 7.18 Future development has the potential to affect water quality through diffuse pollution, waste water discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.
- 7.19 Due to the prevalence of BMV agricultural land within sections of the undeveloped areas surrounding Aldingbourne, new developments which are located outside of the existing town will likely lead to losses of higher quality (best and most versatile) agricultural land.

Key Sustainability Issues

- The Provisional Agricultural Land Quality dataset identifies areas of Grade 1, Grade 2, and some Grade 3a agricultural land within the Neighbourhood Plan area.
- Based on the results of the 'Predictive BMV Land Assessment', greater than 60% of the undeveloped areas surrounding Aldingbourne have a high likelihood of containing BMV land.
- The main watercourse flowing through the Neighbourhood Plan is the Aldingbourne Rife, which flows from north to south of Aldingbourne south, where it drains into the Sussex TRaC.
- The Neighbourhood Plan area is within the 'Aldingbourne Rife' Surface Water NVZ.
- Based on the most recently completed water quality assessments undertaken in 2016, the Environment Agency's Catchment Data Explorer classifies the Aldingbourne Rife as having a 'good' chemical status and a 'poor to moderate' ecological status.
- The reasons for not achieving good status (RNAGs) are primarily attributed to the following activities: sewage discharge, poor soil/nutrient management, groundwater abstraction, transport/land drainage and contaminated land.
- The Neighbourhood Plan area potentially overlaps with the Sharp Sand and Gravel MSA. However, it is difficult to be certain due to the scale of the map presented within Appendix E.

⁵⁷ GOV.UK (2014): 'Minerals Guidance', [online] available to access via: <<u>https://www.gov.uk/guidance/minerals</u>> last accessed [04/09/19]

⁵⁸ West Sussex County Council (2018): 'Joint Minerals Local Plan', [online] available to access via:
<<u>https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/joint-minerals-local-plan/</u>> last accessed [22/08/19]

What are the SEA objectives and appraisal questions for the Land, Soil and Water Resources SEA theme?

| SEA objective | Assessment Questions | | |
|--|---|--|--|
| Ensure the efficient and | Will the option/proposal help to: | | |
| effective use of land. | Promote the use of previously developed land? | | |
| | • Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land? | | |
| | • Protect the integrity of mineral safeguarding areas? | | |
| Promote sustainable waste | Will the option/proposal help to: | | |
| management solutions that encourage the reduction, | Reduce the amount of waste produced? | | |
| re-use and recycling of waste. | Support the minimisation, reuse and recycling of waste? | | |
| waste. | Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? | | |
| | • Encourage recycling of materials and minimise consumption of resources during construction? | | |
| Use and manage water | Will the option/proposal help to: | | |
| resources in a sustainable manner. | Support improvements to water quality? | | |
| | Minimise water consumption? | | |
| | Protect surface water resources? | | |

8. Population and Community

Focus of Theme

- Population size
- Population density
- Age structure
- Deprivation
- Housing mix and affordability
- Education and skills

Policy Context

- 8.1 Key messages from the NPPF include:
 - One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'
 - To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'
 - The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site where possible.
 - Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
 - In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
 - Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
 - Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
 - Ensuring that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

- 8.2 The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change⁵⁹ warns that society is underprepared for an ageing population. The report states that 'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.
- 8.3 At the local level, policies within the 'Sustainable Place' chapter, 'Living Place' chapter and the 'Prosperous Place' chapter of the Adopted Arun Local Plan (2011-2031) directly relate to the population and community SEA theme.

Baseline Summary

Summary of Current Baseline

Population

Table 8.1: Population growth 2001-2011⁶⁰

| Date | Aldingbourne | Arun | South East | England |
|-----------------------------|--------------|---------|------------|------------|
| 2001 | 3,612 | 140,759 | 8,000,645 | 49,138,831 |
| 2011 | 3,819 | 149,518 | 8,634,750 | 53,012,456 |
| Population Change 2001-2011 | +5.7% | +6.2% | +7.9% | +7.9% |

8.4 As shown in Table 8.1, the population of Aldingbourne increased at a lower rate between 2001 and 2011 in comparison to Arun, the South East of England and England averages.
 Approximately 2.6% of the population of Arun live within the Neighbourhood Plan area.

Age Structure

Table 8.2: Age Structure (2011)⁶¹

| | Aldingbourne | Arun | South East | England |
|---------------------|--------------|---------|------------|------------|
| 0-15 | 18.4% | 15.6% | 19.0% | 18.9% |
| 16-24 | 8.3% | 9.2% | 11.2% | 11.9% |
| 25-44 | 23.0% | 21.9% | 26.5% | 27.5% |
| 45-59 | 21.7% | 19.4% | 19.9% | 19.4% |
| 60+ | 28.6% | 33.9% | 23.4% | 22.3% |
| Total Population | 3,819 | 149,518 | 8,634,750 | 53,012,456 |

⁵⁹ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <<u>http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/</u>>last accessed [21/09/18]

⁶⁰ ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

⁶¹ ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

- 8.5 Generally, there is a higher proportion of residents within the 60+ age category within the Neighbourhood Plan area (28.6%) in comparison to the total for the South East of England (23.4%) and England (22.3%), as shown in **Table 8.2**. However, this total is lower than the percentage for Arun (33.9%).
- 8.6 In contrast, a lower proportion of residents are within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (44.7%) in comparison to the totals for the South East of England (46.4%) and England (46.9%). However, this total is higher than the percentage for Arun (41.3%).
- 8.7 Additionally, 26.7% of residents within the Neighbourhood Plan area are within the younger age categories (0-15 and 16-24), higher than the total for Arun (24.8%) but less than the totals for the South East of England (30.2%) and England (30.8%).

Household Deprivation

- 8.8 Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:
 - **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
 - Education: No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
 - Health and Disability: Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
 - Housing: The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Table 8.3: Relative household deprivation dimensions⁶²

| | Aldingbourne | Arun | South East | England |
|-----------------------------|--------------|-------|------------|---------|
| Household not deprived | 50.8% | 40.4% | 47.7% | 42.5% |
| Deprived in 1 dimension | 30.7% | 35.6% | 32.2% | 32.7% |
| Deprived in 2 dimensions | 15.9% | 19.6% | 16.0% | 19.1% |
| Deprived in 3 dimensions | 2.4% | 3.8% | 3.7% | 5.1% |
| Deprived in 4 dimensions | 0.1% | 0.5% | 0.4% | 0.5% |

8.9 Based on the information presented in **Table 8.3**, fewer households are deprived in one or more dimensions within the Neighbourhood Plan area (49.2%) in comparison to the regional and national trends. Out of the 49.2% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in one or two dimensions, which is similar to the regional and national averages.

Index of Multiple Deprivation

8.10 The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

⁶² ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- Education, Skills and Training: The lack of attainment and skills in the local population.
- Health Deprivation and Disability: The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- Crime: The risk of personal and material victimisation at local level.
- Barriers to Housing and Services: The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - a. 'Geographical Barriers': relating to the physical proximity of local services
 - b. 'Wider Barriers': relating to access to housing, such as affordability.
- Living Environment: The quality of the local environment, with indicators falling categorised in two sub-domains.
 - c. 'Indoors Living Environment' measures the quality of housing.
 - d. 'Outdoors Living Environment' measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
 - 1. Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
 - 2. Income Deprivation Affecting Older People Index: The proportion of all those aged 60 or over who experience income deprivation.
- 8.11 Lower Super Output Areas (LSOAs)⁶³ are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.
- 8.12 There are four LSOAs which are either wholly or partly located within the Neighbourhood Plan area, namely: Arun 003D and Arun 003E (both within the northern half) and Arun 003C and Arun 012B (both within the southern half). All the four LSOAs are amongst the top 50% least deprived LSOAs in England based on the 'Overall IMD' domain. However, Arun 003D, Arun 003E and Arun 012D are all amongst the top 40% most deprived LSOAs in England within the 'Barriers to Housing and Services' domain. These three LSOAs cover the majority of the settlements of Aldingbourne, Westergate and Shripney.

⁶³ DCLG (2015): Indices of Deprivation Explorer', [online] available to access via:
<<u>http://dclgapps.communities.gov.uk/imd/idmap.html</u>> last accessed [17/09/19]

Housing Tenure

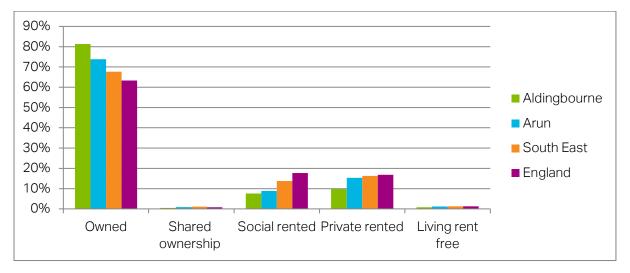
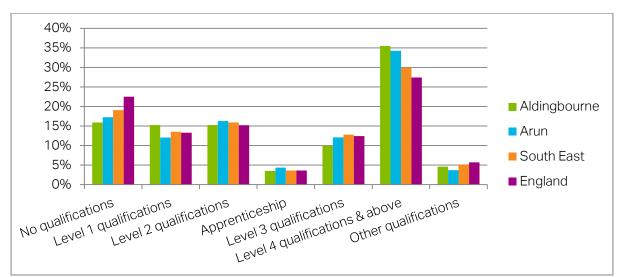


Figure 8.1: 'Tenure by Household' 64

- 8.13 Within the Neighbourhood Plan area, 81.3% of residents either own their home outright or with a mortgage, higher than the totals for Arun (73.8%), the South East of England (67.6%) and England (63.3%).
- 8.14 As shown in **Figure 8.1**, a lower proportion of residents live within social rented and privately rented housing in the Neighbourhood Plan area in comparison to the regional and national trends.
- 8.15 1.3% of residents in the Neighbourhood Plan area live in rent-free accommodation or shared ownership accommodation, which is slightly lower than the totals for Arun (2.0%), the South East of England (2.4%) and England (2.1%).



Education

Figure 8.2: 'Highest level of Qualification' 65

8.16 Based on the 2011 census data presented in **Figure 8.2**, 15.2% of residents in the Neighbourhood Plan area have no qualifications, lower than the total for Arun (17.2%), the South East of England (19.1%) and England (22.5%).

⁶⁴ ONS (no date): Census 2011: Tenure-Households 2011 (Table QS405EW)

⁶⁵ ONS (no date): Census 2011: Highest Level of Qualification 2011 (Table QS501EW)

8.17 Comparatively, 35.5% of residents within the Neighbourhood Plan area have a Level 4 qualification or above, which is higher than the total for Arun (34.3%), the South East of England (29.9%) and the total for England (27.4%).

Employment

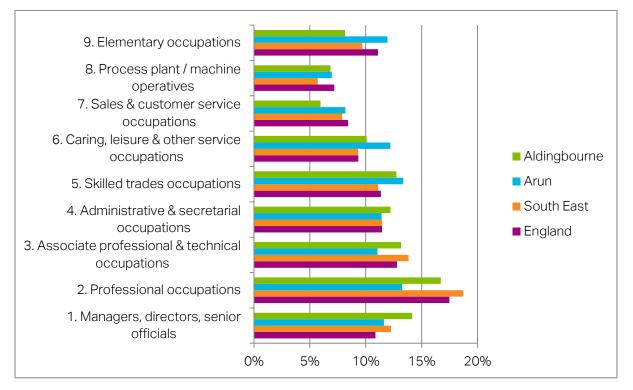


Figure 8.3: 'Occupation of usual residents aged 16 to 74 in employment⁶⁶

- 8.18 Regarding employment within the Neighbourhood Plan area, the following three occupation categories support the most residents:
 - Professional occupations (16.7%);
 - Managers, directors and senior officials (14.2%); and
 - Associate professional and technical occupations (13.2%)
- 8.19 Overall, 44.0% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, greater than the totals for Arun (35.9%) and England (41.1%) but similar to the total for the South East of England (44.8%). This is highlighted in **Figure 8.3**.

Community Assets

- 8.20 The Neighbourhood Plan area has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the Parish's sense of identity. Within Aldingbourne, such assets include: Aldingbourne Country Centre, Denmans Gardens, two community sports centres, GP surgery, local stores / post office, a school, and St Mary's Church.
- 8.21 Additionally, there are open areas of significance within the Neighbourhood Plan area which are demonstrably special to a local community, for example: because of their beauty, historic significance, recreational value and/or biodiversity value. The draft version of the Neighbourhood Plan highlights that there are several local green spaces and local open spaces within the parish.

⁶⁶ ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)

Summary of Future Baseline

8.22 As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community and economy of certain parts of the Neighbourhood Plan area, whilst also placing additional pressures to existing services and facilities. The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

Key Sustainability Issues

- The population of Aldingbourne increased at a lower rate between 2001 and 2011 in comparison to Arun, the South East of England and England averages.
- Generally, there is a higher proportion of residents within the 60+ age category within the Neighbourhood Plan area (28.6%) in comparison to the regional and national trends.
- Aldingbourne has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the parish's sense of identity. There are several local green spaces and local open spaces within the parish.
- In terms of deprivation, Arun 003d, Arun 003E and Arun 012D are all amongst the top 40% most deprived LSOAs in England within the 'Barriers to Housing and Services' domain.

What are the SEA objectives and appraisal questions for the Population and Community SEA theme?

| SEA objective | Assessment Questions | | |
|--|--|--|--|
| Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high- quality community services and facilities. Reduce deprivation and promote a more inclusive and self-contained community. | Will the option/proposal help to: Encourage and promote social cohesion and encourage active involvement of local people in community activities? Minimise fuel poverty? Maintain or enhance the quality of life of existing local residents? Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? Support the provision of land for allotments and cemeteries? | | |
| Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures. | Will the option/proposal help to: Support the provision of a range of house types and sizes? Support enhancements to the current housing stock? Meet the needs of all sectors of the community? Provide quality and flexible homes that meet people's needs? Promote the use of sustainable building techniques, including use of sustainable building materials in construction? Provide housing in sustainable locations that allow easy access to a range of local services and facilities? | | |

9. Health and Wellbeing

Focus of Theme

- Health indicators and deprivation
- Influences on health and wellbeing

Policy Context

- 9.1 Key messages from the NPPF include:
 - One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'
 - 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'
 - Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
 - Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
 - Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- 9.2 In relation to other key national messages in relation to health, Fair Society, Healthy Lives⁶⁷ ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that 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".
- 9.3 The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.
- 9.4 At the local level, policies within the 'Health, Recreation & Leisure' section of the Adopted Arun Local Plan (2011-2031) directly relate to the health and wellbeing SEA theme.

⁶⁷ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: < https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf > last accessed [24/09/18]

Baseline Summary

Summary of Current Baseline

Joint Strategic Needs Assessment

- 9.5 At the regional level, the 2018 Joint Strategic Needs Assessment (JSNA) summary for West Sussex⁶⁸ provides a variety of statistics relating to the following themes: environment, population, assets and health/wellbeing, and provides a section on each broad life-stage of the population: childhood (starting well), working age (living well) and older age (ageing well). Summary of the key challenges as follows:
 - Year-on-year changes in the 65 and over population, averaging +2,500 per year between 2002 and 2017, with a projected average of +4,800 per year between 2017 and 2032;
 - In 2016/2017, 19.3% of adults were estimated to be physically inactive;
 - 60% of adults and 29% of 10/11-year olds are overweight (including obese);
 - Violent crime (as measured by the rate of recorded violent crime including sexual offences per 1,000 population) has been increasing in West Sussex, and nationally, in recent years. In 2016/17 there were a total of 13,567 recorded offences compared with 9,740 in 2014/15;
 - The rate of people killed or seriously injured on the roads remains high in West Sussex. The rate for 2014-16 of 56.8 per 100,000 is significantly higher than England (39.7) and the 4th highest amongst comparable authorities; and
 - It is estimated that 117,400 adults (aged 16+) in West Sussex are likely to have a common mental health problem, namely: generalised anxiety disorder, depression, phobias, obsessive compulsive disorder or a panic disorder.
- 9.6 Published for public consultation in December 2018 and reflecting the outcomes of the JSNA, the consultation draft of the Joint Health and Wellbeing Strategy 2019-2024 (JHWS) outlines a variety of aims which focus on the most important issues across the county, with an overall vision as follows⁶⁹:

"West Sussex is a good place in which to grow up, achieve, raise a family and grow old, in strong, safe and sustainable communities – it is a place where improved health and wellbeing is experienced by all our residents, and the health and wellbeing gap between communities is reducing."

Public Health Profile for Arun District

- 9.7 Published in July 2018 by Public Health England, the public health profile for Arun district outlines the following key trends⁷⁰:
 - Life expectancy for both men and women is slightly higher than the England averages;
 - Life expectancy is 9.5 years lower for men and 8.2 years lower for women in the most deprived areas of Arun than in the least deprived areas; and
 - Estimated levels of adult physical activity (63.9%) are lower than the regional total (69.8%) and the national total (66.3%) based on 2017/18 data.

⁶⁸ West Sussex Health and Wellbeing Board (2018): 'JSNA Summary', [online] available to access via:

https://jsna.westsussex.gov.uk/updates/west-sussex-jsna-summary-2018/ last accessed [22/08/19]

⁶⁹ West Sussex Health and Wellbeing Board (2018): 'Joint Health and Wellbeing Strategy 2019-24 (Consultation Draft)', [online] available to access via: <<u>https://haveyoursay.westsussex.gov.uk/public-health/jhw-strategy-consultation/</u>> last accessed [22/08/19]

⁷⁰ Public Health England (2018): 'Public Health Profile for Arun', [online] available to access via: <<u>https://fingertips.phe.org.uk/profile/health-profiles</u>> last accessed [17/09/19]

Prepared for: Aldingbourne Neighbourhood Plan Steering Group

Health indicators and deprivation

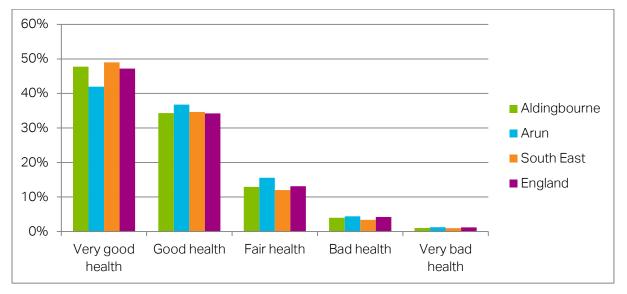


Figure 9.1: 'General Health'71

- 9.8 Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in Chapter 8. As highlighted in **Figure 9.1**, 82.1% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', broadly aligning to the totals for the South East of England (83.6%) England (81.4%) but higher than the total for Arun (78.8%). Additionally, 5.0% of residents in the Neighbourhood Plan area consider themselves to have 'bad health' or 'very bad health', lower than the totals for Arun (5.7%) and England (5.4%), but higher than the total for the South West of England (4.3%).
- 9.9 The total percentage of residents within the Neighbourhood Plan area who report that their activities are limited either 'a little' or 'a lot' (17.7%) broadly aligns with the total for England (17.6%). Comparatively, the total for the Neighbourhood Plan area is higher than the total for the South East of England (15.7%) and lower than the total for Arun (21.1%).

| | Aldingbourne | Arun | South East | England |
|-------------------------------|--------------|-------|------------|---------|
| Activities limited 'a lot' | 8.1% | 9.4% | 6.9% | 8.3% |
| Activities limited 'a little' | 9.6% | 11.7% | 8.8% | 9.3% |
| Activities 'not limited' | 82.3% | 78.9% | 84.3% | 82.4% |

Table 9.1: Disability⁷²

Summary of Future Baseline

- 9.10 Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way.
- 9.11 However, an ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing to key population groups (i.e. elderly population).

⁷¹ ONS (no date): Census 2011: 'General Health 2011' (Table QS302EW)

⁷² ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

9.12 Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

Key Sustainability Issues

- The JSNA highlights that annual changes in the 65+ population averaged +2,500 per year between 2002 and 2017, projecting averages of +4,800 per year between 2017 and 2032.
- The 2018 Public Health Profile for Arun estimated that levels of adult physical activity across the district (63.9%) is lower than the regional total (69.8%) and the national total (66.3%).
- 17.7% of residents within the Neighbourhood Plan area who report that their activities are limited either 'a little' or 'a lot'.
- 82.1% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', broadly aligning to the totals for the South East of England (83.6%) England (81.4%) but higher than the total for Arun (78.8%).

What are the SEA objectives and appraisal questions for the Health and Wellbeing SEA theme?

| SEA objective | Assessment Questions |
|---|--|
| Improve the health and wellbeing residents within the Neighbourhood Plan area. | Will the option/proposal help to: |
| | • Promote accessibility to a range of leisure, health and community facilities, for all age groups? |
| | Address the key challenges identified in the JSNA? |
| | Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? |
| | Promote the use of healthier modes of travel? |
| | Improve access to the countryside for recreational use? |
| | Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths? |

10.Transportation

Focus of Theme

- Transportation infrastructure
- Traffic flows and congestion
- Accessibility
- Car ownership
- Travel to work

Policy Context

- 10.1 European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.
- 10.2 Key messages from the NPPF include:
 - 'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - i. The potential impacts of development on transport networks can be addressed
 - *ii.* Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised
 - *iii.* Opportunities to promote walking, cycling and public transport use are identified and pursued
 - *iv.* The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account
 - v. Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'
 - 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'
- 10.3 At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, the West Sussex LTP3 2011-2026 is a strategic policy tool through which the council exercises its responsibilities for planning, management and the development of transport in the county⁷³. The four strategies within the LTP3 that guide the Council's approach to maintaining, managing and investing in transport include: promoting economic growth, tackling climate change, providing access to services, employment and housing, and improving safety, security and health.

⁷³ West Sussex County Council (2011): 'West Sussex LTP3', [online] available to access via:
<<u>https://www.westsussex.gov.uk/about-the-council/policies-and-reports/roads-and-travel-policy-and-reports/west-sussex-transport-plan-2011-26-ltp3/</u>> last accessed [17/09/19]

10.4 At the local level, policies within the 'Transport' section of the Adopted Arun Local Plan (2011-2031) directly relate to the transportation SEA theme.

Baseline Summary

Summary of Current Baseline

Rail network

10.5 There are no railway stations within Aldingbourne parish. The nearest mainline railway station connecting residents to the national network is in the settlement of Barnham, approximately 2km to the east of the Neighbourhood Plan area. This station is a stopping point along the West Coastway line between Brighton and Southampton. Trains operated by 'Southern' also regularly depart for London Victoria (via Gatwick Airport), Portsmouth, Littlehampton and Bognor Regis⁷⁴.

Bus network

10.6 Regarding the bus network, local bus services connecting the parish include Stagecoach route 66 between Bognor and Walberton, along with the Compass 85A between Arundel and Chichester. The 'Transport' evidence base document completed to support the preparation of the Neighbourhood Plan notes that the use of these bus services to connect with rail services is limited due to the low frequency of these services⁷⁵.

Road network and congestion

- 10.7 The 'A27' passes through the northern section of the Neighbourhood Plan area, connecting residents to the settlements of Arundel (to the east) and Chichester (to the west). The 'A29' passes north to south through the Neighbourhood Plan area, through the settlements of Fontwell, Westergate, Woodgate and Shripney, before reaching Bognor Regis at the coastline.
- 10.8 Along with a network of 'C' roads, the B2233 extends east to west through the central section of the Neighbourhood Plan area, connecting to the settlements of Norton, Eastergate and Barnham.
- 10.9 In terms of congestion, key concerns include the volume of traffic on the A29 and queues arising from the Woodgate level crossing. The safety of pedestrians along the A29 is also a concern, particularly for children walking or cycling to school.

Cycle and footpath network

- 10.10 A comprehensive Public Rights of Way network serves the Neighbourhood Plan area, with numerous footpaths and bridleways linking between the settlements of Aldingbourne, Westergate and Shripney.
- 10.11 In terms of the cycle network⁷⁶, there are no routes which pass through the Neighbourhood Plan area. The nearest route (number 2) passes through Bognor Regis and Chichester.

⁷⁴ Trainline (2019): <<u>https://www.thetrainline.com/stations/barnham</u>> last accessed [18/09/19]

⁷⁵ Aldingbourne Parish Council (2016): 'Transport Map', [online] available to access via: <<u>https://aldingbourne-pc.gov.uk/media/4303/transport_map.pdf</u>> last accessed [17/0919]

⁷⁶ Sustrans (2019): 'National Cycle Network Map', [online] available to access via: <<u>https://www.sustrans.org.uk/national-cycle-</u> network/> last accessed [17/09/19]

Availability of cars and vans

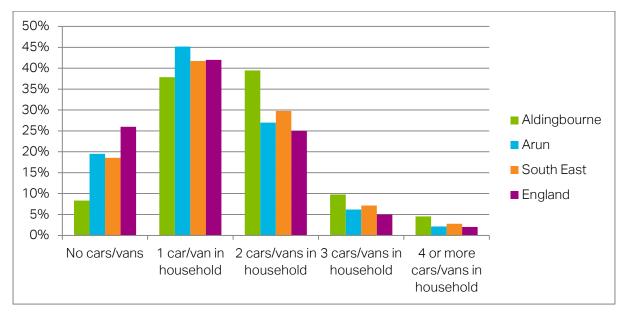
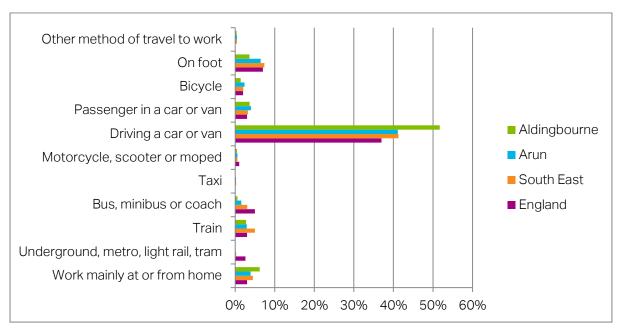


Figure 10.1: 'Car and van ownership' ⁷⁷

- 10.12 Based on the 2011 census data presented in **Figure 10.1** above, 91.7%% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals for Arun (80.5%), the South East of England (81.4%) and England (74.2%).
- 10.13 Likewise, the total number of households in the Neighbourhood Plan area with access to at least two cars or vans (39.5%) is higher than the totals for Arun (27.0%), the South East of England (29.8%) and England (25.0%).



Travel to work

Figure 10.2: 'Method of Travel to Work'78

⁷⁷ ONS (no date): 'Car or Van Availability 2011', (Table QS416EW)

⁷⁸ ONS (no date): Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

- 10.14 As shown in **Figure 10.2**, the most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (51.7%) which is greater than the totals for Arun (41.1%), the South East of England (41.3%) and England (37.0%).
- 10.15 A lower percentage of residents in the Neighbourhood Plan catch a train, bus, minibus, coach or walk to work (6.9%) in comparison to the totals for Arun (10.9%), the South East of England (15.4%) and England (15.0%).

Summary of Future Baseline

- 10.16 New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes. This is likely to continue to be more pronounced at weekends and during peak times of year (i.e. rush hours) due to the influx commuters passing through the area. This is particularly significant in the local context, due to the pressures from the local road network (particularly from the A29).
- 10.17 Public transport use is likely to remain low compared with private car use. This is due to the relative inaccessibility of the neighbourhood Plan area via public transport, particularly in the absence of a train station and with the limited frequency of bus service connecting to the neighbouring station at Barnham.
- 10.18 Whilst negative effects of new development on the transport network are likely to be mitigated in part by the LTP, there will be a continuing need for development to be situated in accessible locations.

Key Sustainability Issues

- There are no railway stations within Aldingbourne parish. The nearest mainline railway station connecting residents to the national network is in the neighbouring settlement of Barnham.
- In terms of congestion, key concerns include the volume of traffic on the A29 and queues arising from the Woodgate level crossing. The safety of pedestrians along the A29 is also a concern, particularly for children walking or cycling to school.
- A lower percentage of residents in the Neighbourhood Plan catch a train, bus, minibus, coach or walk to work (6.9%) in comparison to the totals for Arun (10.9%), the South East of England (15.4%) and England (15.0%).
- 91.7%% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals for Arun (80.5%), the South East of England (81.4%) and England (74.2%).
- The total number of households in the Neighbourhood Plan area with access to at least two cars or vans (39.5%) is higher than the regional and national trends.

What are the SEA objectives and appraisal questions for the Transportation SEA theme?

| SEA objective | Assessment Questions | | |
|--|--|--|--|
| Promote sustainable transport use and reduce the need to travel. | Will the option/proposal help to: | | |
| | Encourage modal shift to more sustainable forms of travel? | | |
| | Facilitate working from home and remote working? | | |
| | Improve road safety? | | |
| | • Reduce the impact on residents from the road network? | | |

11.Next Steps

Subsequent stages for the SEA process

- 11.1 The five stages of the SEA process⁷⁹ are identified below. Scoping (the current stage) is the second stage of the SEA process.
 - i. Screening;
 - ii. Scoping;
 - iii. Assess reasonable alternatives, with a view to informing preparation of the draft plan;
 - iv. Assess the draft plan and prepare the Environmental Report with a view to informing consultation and plan finalisation;
 - v. Publish a 'statement' at the time of plan adoption in order to 'tell the story' of planmaking / SEA (and present 'measures concerning monitoring')
- 11.2 The next stage will involve appraising reasonable alternatives for the Aldingbourne Neighbourhood Plan. This will consider alternative policy approaches for the plan, including alternative spatial strategies. The findings of the appraisal of these alternatives will be fed back to Aldingbourne Neighbourhood Plan Steering Group (the Neighbourhood Plan group) so that they might be taken into account when preparing the draft plan.
- 11.3 Once the draft ('submission version') plan has been prepared by the Neighbourhood Plan group, it will be subjected to SEA and the Environmental Report prepared for consultation alongside it.
- 11.4 Following submission to Arun District Council, and consultation, the Neighbourhood Plan will be put forward for Independent Examination.

Consultation on the Scoping Report

- 11.5 Public involvement through consultation is a key element of the SEA process. At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public.
- 11.6 The statutory consultation bodies are the Environment Agency, Historic England and Natural England. The Scoping Report has been released to these three statutory consultees.
- 11.7 Consultees are invited to comment on the content of this Scoping Report, in particular the evidence base for the SEA, the identified key issues and the proposed SEA Framework.
- 11.8 The consultation period runs from [TBC] to [TBC]. Comments on the Scoping Report should be sent to:

Ryan Putt, AECOM

Email address: ryan.putt@aecom.com

11.9 All comments received on the Scoping Report will be reviewed and will influence the development of the SEA where appropriate.

⁷⁹ In accordance with the stages set out in the National Planning Practice Guidance

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