# Ford Neighbourhood Plan 2016 – 2031

# Strategic Environmental Assessment Scoping Report



November 2015



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# Strategic Environmental Assessment Scoping Report

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# **ABBREVIATIONS AND GLOSSARY**

Abbreviations		
ADC	Arun District Council	
BGS	British Geological Survey	
DCLG	Department for Communities and Local Government	
SEA	Strategic Environmental Assessment	
FNP	Ford Neighbourhood Plan	
FRA	Flood Risk Assessment	
На	Hectares	
HRA	Habitats Regulations Assessment	
Km	Kilometre	
LPA	Local Planning Authority	
NCR	National Cycle Route	
NPPF	National Planning Policy Framework	
ONS	Office for National Statistics	
PPG	Planning Practice Guidance	
PRoW	Public Right of Way	
SA	Sustainability Appraisal	
SEA	Strategic Environmental Assessment	
SSSI	Site of Specific Scientific Interest	
SoS	Secretary of State	
SuDS	Sustainable Drainage System	
WWI	World War One	
WWII	World War Two	
Glossary		
Aquifer	A geological formation (soil or rock) which is able to store water in significant quantities and transmit water relatively quickly under natural conditions (or when pumped).	
Baseline	Environmental conditions at specific periods of time, present on, or near a site, against which future changes may be measured or predicted.	
Biodiversity	Abbreviated form of 'biological diversity'.	
Bronze Age	The period between 2500 BC and 700 BC characterised by the use of bronze.	
Consultation	Procedures for assessing public opinion about a plan or major development proposal, or in the case of a planning application, the means of obtaining the views of affected neighbours or others with an interest in the proposal.	
Contamination	Contamination is the addition, or the result of addition, or presence of a material or materials to, or in, another substance to such a degree as to render it unfit for its intended purposes.	

Heritage       from past generations, maintained in the present and bestowed for the benefit of future generations. Cultural heritage includes both physical culture (such as buildings, monuments, landscapes, books, works of at and artefacts) as well as intangible culture (such as folklore, traditions, language and knowledge).         Cumulative       The summation of effects that result from changes caused by a development in conjunction with other baseline, present or reasonably foreseeable actions.         Development       A set of documents (text and maps) which contain the regional planning body and local planning authority policies and proposals for development, including minerals (Regional Spatial Strategies and Development Plan Documents).         Effect       A physical or measurable change to the environment attributable to the project.         Fauna       Animal life         Features (Landscape Feature or Element)       A component part of the landscape (e.g. hedgerow, wood, stream) (classifications for flood zones as defined in the NPPF:         • Zone 1: Low probability (less than 1 in 1000 annual probability of river or sea flooding in any year);       • Zone 2: Medium probability (between 1 in 100 annual probability of sea flooding in any year); and         Flora       Plant life         Green       Green infrastructure is a planned network of green spaces and other natural features including in any given year).         Flora       Plant life         Green       Green infrastructure is a planned network of green spaces and other natural features including street trees, gardens, green roofs, community forests, park		
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Landscape Sensitivity	The extent to which a landscape can accept change of a particular type and scale without unacceptable adverse effects on its character.
Listed Building	Buildings placed on statutory lists of buildings of 'special architectural or historic interest' compiled by the Secretary of State for Culture, Media and Sport under the Planning (Listed Buildings and Conservation Areas) Act 1990, on advice from English Heritage. There are three classes of listed building:
	<ul> <li>Grade I buildings are considered to be of exceptional interest and are sometimes internationally important;</li> </ul>
	<ul> <li>Grade II* buildings are particularly important and of more than special interest; and</li> </ul>
	• Grade II Listed Building are considered to be of national importance and special interest.
Local Planning Authority	The local planning authority is the district, borough, unitary, city or county council who are the body responsible for the preparation of development plans, processing planning applications and guiding development within the administrative area. Local decision making authority in this case is Arun District Council.
Phase 1 Habitat Survey	An ecological survey technique that provides a standardised system to record vegetation and wildlife habitats. It enables a basic assessment of habitat type and its potential importance for nature conservation. Each habitat type or feature is identified and presented on a map.
Public Right of Way (PRoW)	A right of passage by the public over the surface of the land without impediment. Public Rights of Way include public footpaths, bridleways and byways open to all traffic and Restricted Byways.
Receptor	A component of the natural, created or built environment such as human being, water, air, a building, or a plant that has the potential to be affected by the neighbourhood plan.
Roman Age	The period in England between about 49 AD and 410 AD.
Scheduled Monument	A building included in the Schedule of Monuments compiled under Section 1 of the Ancient Monuments, and Archaeological Area Act 1979. Scheduled Monuments have statutory protection under this Act (Section 2) and an application for Scheduled Monument Consent must be made to the Secretary of State for Culture, Media and Sport if work to a Scheduled Monument is proposed. The Secretary of State for Culture, Media and Sport is responsible for the scheduling under the provisions of the Ancient Monuments and Archaeological Areas Act 1979. Scheduled Monuments are excluded from Listed Building control procedures.
Scoping	An exercise undertaken to determine the topics to be addressed within the SEA Environmental Report.
Strategic Environmental Assessment (SEA)	A systematic decision support process, aiming to ensure that environmental and possibly other sustainability aspects are considered effectively in policy, plan and programme making.
SEA Regulations	The SEA Regulations reproduce the EU Directive 2001/42/EC and applied to any plan or programme which relates either solely to the whole or any part of England, or to England and any other part of the UK. They adapt the Directive to arrangements in the UK in certain respects, notably by defining the authorities responsible for SEA, designating the organisations to be consulted and setting out time limits and other arrangements for consulting and informing authorities and the public.

Sustainability Appraisal (SA)	An appraisal of the economic, environmental, and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development. Section 19 of the Planning and Compulsory Purchase Act (2004) enforces the requirement to carry out a sustainability appraisal in the preparation of a Local Plan.
Sustainable Drainage System (SuDS)	Sustainable management practices designed to control the rate and quality of surface water runoff into receiving waters, for example the use of swales and wetlands as buffers, as opposed to conventional drainage practices.

# **1. INTRODUCTION**

#### **Purpose of Report**

- 1.1. This report has been prepared on behalf of the Ford Neighbourhood Plan Steering Group and sets out the scope of the Strategic Environmental Assessment (SEA) undertaken for the Ford Neighbourhood Plan (FNP). The report accompanies a request for an SEA Scoping Opinion from Arun District Council (ADC) in accordance with the Environmental Assessment of Plans and Programmes Regulations (2004) (hereafter referred to as the "SEA Regulations"). A formal screening opinion requiring an SEA was issued by ADC in July 2015 (see Appendix 1).
- 1.2. The Localism Act 2011 introduced the right for local communities to play an active role in shaping development in their area. To that end, ADC designated a Neighbourhood Plan Area (see Figure 1) for the whole of the parish of Ford on 6<sup>th</sup> December 2013 for the purpose of enabling Ford Parish Council to prepare the FNP. The FNP will be submitted to ADC by the Parish Council for examination under the Neighbourhood Planning (General) Regulations 2012<sup>1</sup>.
- 1.3. The purpose of this report is to summarise the evidence base and propose the scope of the SEA by agreeing the assessment methods, the structure and contents of the SEA and the relevant background and environmental issues. The report also addresses the requirement for assessment of reasonable alternatives and cumulative effects. The report will provide the local community with a key starting point from which to embark on formulating the draft Neighbourhood Plan and it will provide the Parish Council with a means of consulting the statutory authorities<sup>2</sup> on the proposed scope of the SEA, as required by Regulation 12(5) of the SEA Regulations.

#### The Study Area

#### Neighbourhood Planning Area

1.4. The Neighbourhood Planning Area extends to the whole of the parish boundary and covers approximately 400 hectares (ha). The area lies within the administrative boundary of ADC, within the ward of Yapton, and is located approximately 3km south of Arundel. Further north of Arundel lies the South Downs National Park. The River Arun forms the eastern extent of the area, beyond which lie agricultural fields and the built up area of Littlehampton. The coastal town of Bognor Regis is located to the south-west of Ford with Pagham and Selsey located

<sup>&</sup>lt;sup>1</sup> HMSO, Neighbourhood Planning Regulations, April 2012. Available online: <u>http://www.legislation.gov.uk/uksi/</u>2012/637/pdfs/uksi\_20120637\_en.pdf

<sup>&</sup>lt;sup>2</sup> Natural England, Historic England and the Environment Agency

beyond.

#### The Study Area

- 1.5. For the purposes of the FNP, the majority of the development will be concentrated within the centre of the parish and this SEA Scoping Report will refer to this area surrounding the airfield as the "Site" (see site location plan at Figure 2). Here is where development will be focused and all baseline and environmental information will be relevant to this geographical area.
- 1.6. The majority of the Site comprises arable farmland and pasture and contains a former RAF airfield towards the centre and south of the Site. Ford Industrial Estate is located to the west of the Site and is to be retained as part of the FNP. Similarly, facilities utilised by Southern Water and Grundon are also to be retained and are located within the Site boundary, to the east.

#### **The Ford Neighbourhood Plan**

- 1.7. The FNP will establish a vision for the parish and help deliver the local communities' aspirations with regard to development proposed in the parish. Extensive consultation with the local community and key stakeholders will be a key feature in the development of the FNP which has been drafted by the Neighbourhood Planning Steering Group. At this stage of the plan process the scale and quantum of development have been evolving in response to discussions with ADC and the identified need for housing within the District as set out in the document "Objectively Assessed Needs for Housing Arun District"<sup>3</sup>. An illustrative masterplan (Figure 3) has been produced which visualises the Neighbourhood Plan Steering Group's ideas for the parish and at this stage it is anticipated that the vision will include community facilities, such as a village centre, as well as up to 1,550 residential dwellings, a primary school and areas of sports pitches/open space.
- 1.8. In addition to the provision of housing on Ford airfield, an outline planning application (Planning ref. F/7/15/OUT) for 45 residential dwellings for Land off Burndell Road was submitted in April 2015 and will contribute to the overall housing provision of up to 1,550 dwellings. This site is located to the west of Ford airfield and is highlighted on the illustrative masterplan (Figure 3). The site will also be included in the proposals map within the FNP, along with the proposals for the remainder of the parish. These additional proposals include areas of local green space, agricultural land and biodiversity areas.
- **1.9.** The FNP sets out the following vision:

<sup>&</sup>lt;sup>3</sup> GL Hearn, Objectively Assessed Needs for Housing Arun District, March 2015

"In 2023 Ford Parish will continue to be an attractive place to live, maintaining its intrinsic rural character whilst allowing for sustainable development and improving local services. Agricultural land production will continue to be the major land use over the larger part of the parish. The different parts of the parish will be connected through a network of cycle ways and footpaths. Local businesses and those working from home will benefit from an enhanced broadband and internet service with the ability to expand to local small start-up business premises".

#### Strategic Environmental Assessment

- 1.10. SEA seeks to provide high level protection of the environment by integrating environmental considerations into the process of preparing plans and programmes. The process involves the systematic assessment of a proposed plan or programme to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision making. The requirement for SEA is set out in the European Directive 2001/42/EC ("SEA Directive") adopted into UK law as the "Environmental Assessment of Plans or Programmes Regulations 2004<sup>4</sup>" and includes the following requirements:
  - An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes;
  - The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;
  - The environmental characteristics of areas likely to be significantly affected;
  - Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to The Birds Directive 2009/147/EC<sup>5</sup> and The Habitats Directive 92/43/EEC<sup>6</sup>;
  - The environmental protection objectives, established at international, community or

<sup>&</sup>lt;sup>4</sup> HMSO, The Environmental Assessment of Plans and Programmes Regulations, July 2004. Available online: <u>http://</u>www.legislation.gov.uk/uksi/2004/1633/contents/made

<sup>&</sup>lt;sup>5</sup> European Commission, Directive 2009/147/EC, January 2010. Available online: http://eur-lex.europa.eu/LexUriServ/ LexUriServ.do?uri=OJ:L:2010:020:0007:0025:en:PDF

<sup>&</sup>lt;sup>6</sup> European Commission, Directive 92/43/EEC, May 1992. Available online: http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/? uri=CELEX:31992L0043&from=EN

national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation; and

- The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- 1.11. Since 2004, the requirement for SEA of relevant plans and programmes has been aligned with the similar process of Sustainability Appraisal (SA) in the England. In 2014 it was confirmed in the Planning Practice Guidance (PPG)<sup>7</sup> that an SA is not required in support of a Neighbourhood Plan but that SEA may still be necessary in circumstances where policies may have a significant environmental effect. The methodology of the assessment should be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan, in a relatively small parish area.

<sup>&</sup>lt;sup>7</sup> DCLG, Planning Practice Guidance, March 2014. Available online: <u>http://planningguidance.planningportal.gov.uk/blog/guidance/</u>

### 2. METHODOLOGY

#### Stages in SEA

2.1. Table 1 provides a summary of the procedural steps for the SEA based on both the PPG and "A Practical Guide to the SEA Directive"<sup>8</sup>. The steps shaded in green are the stages addressed in this scoping report. The second column identifies where information about each stage can be found in this document.

#### Table 1: SEA Stages

SEA Stage		
Stage A: Setting the context & objectives, establishing the baseline and deciding on the scope	Location in this Report	
<ol> <li>Identify other relevant policies, plans and programmes, and sustainability objectives</li> </ol>	Section 2.12 and Appendix 3	
2. Collect baseline information	Sections 3	
3. Identify sustainability issues and challenges	Sections 3	
4. Develop the Sustainability Appraisal Framework	Section 12	
5. Consult on the scope of the Sustainability Report	Section 14	
Stage B: Developing and Refining alternatives and assessing effects		
1. Test the Plan objectives against the SEA Framework		
<ol><li>Develop the Plan options including reasonable alternatives</li></ol>	To be prepared as part of	
3. Evaluate the likely effects of the Plan and alternatives	the SEA process following the adoption of ADC's	
4. Consider ways of mitigating adverse, and maximising beneficial effects	Scoping Opinion	
5. Propose measures to monitor the significant effects of implementing the Plan		
Stage C: Prepare the Sustainability Report		
1. Including all requirements of an SEA Environmental Report	To be completed after Stage B	
Stage D: Publish & Consult on the Sustainability Report & Plan		

<sup>&</sup>lt;sup>8</sup> ODPM, A Practical Guide to the Strategic Environmental Directive, September 2005. Available online: <u>https://www.gov.uk/government/uploads/</u> <u>system/uploads/attachment\_data/file/7657/practicalguidesea.pdf</u>

SEA Stage		
1. Consult the consultation bodies and public on the draft Plan and Sustainability Report	To be completed after	
2. Appraise significant changes resulting from representations, and amend the Plan	Stage C	
Stage E: Post adoption reporting and monitoring		
1. Prepare and publish the SEA Post Adoption Statement	To be completed after	
2. Monitor SEA indictors during Plan implementation	Stage D	

#### Review of Policies, Plans and Programmes

2.2. The FNP may be influenced in various ways by other policies, plans or programmes (PPPs), or by external sustainability objectives such as those put forward in strategies or legislation. An SEA acknowledges the potential synergies between PPPs and how they can influence the neighbourhood plan area. Appendix 3 presents an evaluation of the key PPPs that are likely to be relevant to development within Ford and the SEA process.

#### Baseline Data Collection

2.3. Sections 3 presents a review of environmental and socio-economic conditions affecting the neighbourhood plan area by sustainability theme. The purpose of the baseline review is to help define the key sustainability issues for the FNP, which will enable the predicted effects of the plan to be effectively assessed. Furthermore, consultation on the Scoping Report will determine the appropriateness of data and its ability to assess the sustainability of the FNP. The collection of baseline data and identification of sustainability issues will be used to inform the development of the SEA Framework, outlined in Section 12 of this report.

#### Sustainability Themes

- 2.4. The baseline data and the identification of sustainability issues (Stages A-C in Table 1) are presented through a series of sustainability themes which reflect the requirements of the SEA Directive. These incorporate the environmental receptors derived from Annex I(f) of the SEA Directive (Appendix 2): biodiversity flora and fauna, population, human health, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape and the inter-relationship between these factors.
- 2.5. The sustainability themes are as follows:
  - Socio-economics;
  - Transport;

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- Air Quality;
- Biodiversity;
- Air Quality;
- Historic Environment;
- Landscape;
- Water and Flooding;
- Land Contamination; and
- Climatic Factors.

#### Approach to Assessing Effects

- 2.6. The proposals presented in the FNP will be assessed against the SEA Framework outlined in Section 12 of this report, using the scoring matrix in Table 2. The scoring matrix will determine any positive or negative effects of the neighbourhood plan. Both the scoring matrix and the SEA Framework have been based on the SA of ADC's Emerging Local Plan.
- 2.7. It should be noted that ADC submitted the draft Local Plan to Examination on 30<sup>th</sup> January 2015 which was subsequently suspended on 16<sup>th</sup> July 2015 to allow ADC to consult on the revised Objectively Assessed Housing Need to inform the revision of the Local Plan. During this process the SA received a considerable level of criticism and ADC are now undertaking further work to improve the SA and understand opportunities for delivering a higher level of housing. However, the methodology of the SA was not brought into question and therefore the same approach has been adopted for the purposes of this SEA.

#### Table 2: Scoring Matrix

Score	Explanation
++	Positive Strong Evidence
+	Positive Weak Evidence
0/+	Evidence shows low significance impact but potential for positive impact
0	Neutral or no impact
0/-	Evidence shows low significance but likely potential for negative impact
-	Negative Weak Evidence
	Negative Strong Evidence
0/	No impact with assumed full implementation but significant negative if any
0/	aspect fails to be delivered
	Unknown due to lack of evidence or information

#### Scope of the SEA

#### Cumulative Effects

2.8. Cumulative effects have been defined as:

"the net result of environmental impact from a number of projects and activities"<sup>9</sup>

2.9. With reference to development plans, cumulative effects can occur from the combined impacts of policies and proposals on specific areas or sensitive receptors. As required by the SEA Regulations, the assessment of the effects of certain plans and programmes on the environment should consider:

"the likely significant effect...including cumulative and synergistic effects on the environment."

- 2.10. The SEA will identify the cumulative, synergistic and indirect effects of the submission of the FNP as a whole and how the policies within the plan will act cumulatively upon each SEA Framework objective. The FNP is currently draft and subject to change following finalisation. Subsequently, the policies included within the cumulative effects assessment should also be considered draft. These identified policies are as follows:
  - Policy EH1: Protection of trees and hedgerows;
  - Policy EH2: Renewable Energy;
  - Policy EH3: Buildings and Structures of Character;
  - Policy EH4: Surface Water Management;
  - Policy EH5: Green Infrastructure and Ecosystem Services;
  - Policy EH6: Built up area boundary;
  - Policy EH7: Energy Efficiency;
  - Policy LC6: Designation of local green spaces; and
  - Policy LC5: Allocate land for a primary school.

#### Consideration of Alternatives

2.11. The process of SEA can not only identify sustainable options but also document the decisionmaking process with regard to reasonable alternatives. The assessment of alternatives helps to identify the preferred option and ensure that this is the most environmentally sound and

<sup>&</sup>lt;sup>9</sup> Sadler, B (1996) Environmental Assessment in a Changing World. Evaluating Practice to Improve Performance-final Report. International Association for Impact Assessment and Canadian Environment Assessment Agency.

sustainable option. Alternatives should be considered at an early stage of the plan-making process to ensure they are not 'retro-fitted' to fulfil this particular requirement.

- 2.12. The FNP includes a single Site, on which the vision of the plan will be realised. A consideration of alternatives will assess the impacts of no development on Ford Airfield (the "do nothing" alternative) as well as options to bring forward the development elsewhere in the Neighbourhood Planning Area. Consideration will also be given to the different options for development and how the masterplan has developed following consultation with the public and the Neighbourhood Planning Steering Group.
- 2.13. More information of the assessment of alternatives for FNP can be found in Section 12.

#### Habitats Regulations Assessment

- 2.14. The application of Habitats Regulations Assessment (HRA) to land use plans is a requirement of the Conservation of Habitats and Species Regulations 2010<sup>10</sup> (as amended), the UK's transposition of European Union Directive 92/43/EEC (the Habitats Directive). HRA must be applied to all plans which could significantly affect any sites designated for their nature conservation importance as part of a system known collectively as the Natura 2000 network of European sites.
- 2.15. In ADC's formal screening opinion (Appendix 1) it was determined that a HRA will not be required as the Site is located beyond the zone of influence of the designated site at Pagham Harbour, the closest internationally protected site to Ford. However, although beyond the zone of influence set for recreational disturbance, it was noted that any potential impacts on the water network and any linked impacts have been considered, to ensure there would be no detrimental impacts to the overall features of the designated site.

#### **Limitations to the Assessment**

2.16. As a strategic process, the data required to undertake the assessment is purposefully broad (i.e. at a district or borough level) and not at a resolution to allow detailed environmental issues to be teased-out at the parish level. Whilst the data will be Site specific and relevant to the environmental considerations at Ford, it will be limited on detail and only report the key environmental issues which need to be taken into account with regard to the FNP.

<sup>&</sup>lt;sup>10</sup> HMSO, The Conservation of Habitats and Species Regulations, March 2010. Available online: <u>http://www.legislation.gov.uk/uksi/2010/490/pdfs/uksi\_20100490\_en.pdf</u>

# **3. BASELINE CONDITIONS**

#### Socio-economics

**Baseline Data** 

#### Population Projection

3.1. Using Sub-national Population Projections<sup>11</sup>, the population of ADC is expected to increase by 13.5% between 2016 and 2031 (the NP period). This compares to the South East region (11.9%) and England as a whole (10.6%). Table 3 outlines the predicted population projection without the development of Ford and shows that the largest increase in population between 2016 and 2031 will be amongst the elderly population.

	2015	2031	Percentage Increase (%)
0-15 years	~8,000	~8,000	0
16-65 years	~9,000	~9,000	0
66+	~7,000	~10,000	42.9%

#### Table 3: Predicted population increase across age categories

3.2. Using ONS 2011 Census information concerning the number of people per household (3.2), and combining it with the number of households proposed as part of the FNP, Table 4 forecasts the future population of Ford with the development of Ford.

#### **Table 4: Population Projection with Ford Development**

	Ford	Proposal	Total
Population	1,690	4,841	6,531
<b>Existing Houses</b>	537	1,521	2,058
Household	3.17	3.17	3.17

<sup>&</sup>lt;sup>11</sup> ONS, Subnational Population Projections, 2012. Available online: <u>http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-335242</u>

#### Community Facilities

- 3.3. Community facilities for the purposes of this assessment include education provision and healthcare and have been investigated in Ford and the nearby locations of Climping and Yapton. The closest doctor's surgery is Avisford Medical Group which is located approximately 1.1km to the north-west of the Site. This surgery has 10,097 registered patients and primarily takes patients from Middleton, Felpham and Elmer. The police station serving the area is located in Littlehampton, approximately 3.3km to the south-east of the Site.
- 3.4. With regards to education facilities, the nearest primary schools to the Site are St Mary's Primary School in Climping and Yapton Church of England Primary School in Yapton. Information obtained concerning the number of students on-roll has highlighted that neither of these schools are at capacity. Ormiston Six Villages Academy and Littlehampton Academy are the nearest secondary schools to the Site, together these schools hold a capacity for 2,400 pupils.
- 3.5. Under ADC's Sports Pitch Strategy<sup>12</sup> (2009), the local requirement of sports pitches is 0.86ha per 1000 of the population. There are 33 pitches across the whole of ADC, however the only surrounding pitches to the Site are Climping Cricket Ground and King George V recreation ground.

#### Key issues with regard to Socio-economic Factors

- 3.6. With the population of Ford expected to increase both with and without the development, an assessment of the available community facilities has been undertaken to evaluate the ability of existing facilities to support this increase in population.
- 3.7. Due to the nature of the proposals on Ford and the number of residential dwellings proposed, the community facilities surrounding the Site will struggle to support the increase in population should development come forward. With regard to the provision of education facilities surrounding the Site, St Mary's Primary School and Yapton Church of England Primary School are both expected to be soon oversubscribed. The current number of pupils on roll at St Mary's School and Yapton Church of England School are 102 and 266, respectively, and with a capacity of 105 and 315, these are expected to be oversubscribed following development at Ford. In the case of Yapton Church of England School, this is expected to be required following development at Ford.

<sup>&</sup>lt;sup>12</sup> ADC, Playing Pitch Strategy, January 2009

3.8. Despite the number of pitches located within ADC, Ford is located within the Downton area which contains the lowest total pitch provision and the lowest total percentage of its total pitch space available for public access. Specific shortfalls in junior sports pitch provision.

#### Transport

#### Baseline Data

#### Transportation Infrastructure

- 3.9. The location of the Site in relation to the local highway network is shown in Figure 4. The Site is bounded to the east and west by Ford Road and Yapton Road (B2233), respectively. Horsemere Green Lane is situated immediately to the south of the Site.
- **3.10.** Ford Road is a two-way single carriageway road which links the A27 Arundel By-Pass in the north, to the A259 in the south. Ford Road bounds the very eastern edge of the Site, and allows vehicular access to the Site via an existing priority T-junction. Horsemere Green Lane is a two-way single lane road which connects Ford Road/Church Lane to the B2233 via priority T-junctions at either end. This road forms part of the national cycle network, accommodating National Cycle Route (NCR) 2 which follows the B2233 from Yapton and then Horsemere Green lane. This route travels south on Ford Road/Church Lane towards the A259 and the southern coast.
- 3.11. The B2233 is connected to the A259 to the south of the Site and is a two-way single carriageway road which is currently joined by an existing site access. The existing western access to the Site is accessed from the B2233 and takes the form of a priority T-junction with good visibility on either side. The A259 is a two-way single carriage trunk road which offers connections to key destinations such as Portsmouth and Chichester to the west, and Littlehampton and Brighton to the east.

#### Existing Travel Behaviour

3.12. The existing travel patterns for journeys to work were investigated for the 'Yapton' ward. These data provide an understanding of the existing travel behaviour of residents in the area. Table 5 shows the methods of travel from this ward, which have been taken from the 2011 census data.

Mode	Yapton (Ward)	West Sussex (County)	South East (Region)	England (Country)
Work mainly at or from home	5%	7%	7%	5%
Underground, metro, light rail, tram	0%	0%	0%	4%
Train	5%	8%	7%	5%
Bus, Minibus or coach	2%	4%	4%	7%
Taxi	0%	0%	0%	1%
M o t o r c y c l e , Scooter or Moped	1%	1%	1%	1%
Driving a car or van	70%	62%	61%	57%
Passenger in a car or van	5%	5%	5%	5%
Bicycle	3%	3%	3%	3%
On Foot	8%	11%	11%	11%
Other method of travel to work	1%	1%	1%	1%
Total	100%	100%	100%	100%

#### Table 5: Method of Travel to Work (2011 Census)

- 3.13. The data summarised in Table 5 illustrate that the majority of existing residents of the Yapton ward currently travel to work by private car (75% driver or passenger). This is slightly higher than the proportion of travel to work by private car in West Sussex (67%), South East England (66%), and England (62%). However, this is expected due to the small amount of development in the area and its rural nature.
- 3.14. Journeys to work made on foot and by bicycle are 8% and 3% respectively. These are only slightly lower than the regional proportions and are likely to be due to the lack of built-up areas within reasonable walking or cycling distance for places of work. However, on par with England, the proportion of those travelling to work by train (5%) is relatively high. This is likely to be a result of the multiple train services to the nearest urban areas.

#### Accessibility by Non Car Modes

#### Rail

3.15. The nearest railway station is Ford Rail Station, which is located approximately 1.8 km or a 7 minute bike ride from the centre of the Site. A summary of the rail services from Ford Station are shown in Table 6. There are a number of rail services provided from Ford Rail Station with the services to London, Portsmouth and Southampton providing a link to national services to destinations further afield.

Destination	Weekday Frequency	Journey Time
Southampton Central	Hourly	65 minutes
Portsmouth Harbour	5 trains in morning	45 minutes
	commuter peak	
Brighton	Hourly	40 minutes
London Victoria (via Horsham)	Hourly	102 minutes
Portsmouth & Southsea	Hourly	40 minutes
Littlehampton	2 per hour	5 minutes
Bognor Regis	Approx. 3 per hour	11 minutes

#### **Table 6: Summary of Rail Services from Ford**

#### Bus

- 3.16. The nearest bus stops to the Site are 'Nelson Row (both directions)' on Ford Road, 'Horsemere Green Lane (both directions)' on the B2233 Yapton Road, and 'Rollaston Park (both directions)' on the B2233 Yapton Road. These stops are located at both sides of the Site at a range of approximately 200 and 450m from the nearest pedestrian Site accesses.
- 3.17. These bus stops are served by the 670 service to Littlehampton and Arundel, the 700 to Littlehampton, Bognor Regis and Chichester, and the X4 to the outskirts of Brighton and Bognor Regis. There are few buses that pass the Site to the east, however there is a regular service of approximately three buses per hour passing the Site to the west. Despite this, the wider bus network is extensive, particularly when combined with a rail journey from Ford Rail Station. Figure 5 illustrates the wider bus network.

#### Cycling

- 3.18. NCR 2 follows the B2233 (Burndell Rd/Yapton Rd) to the west of the Site, this long distance route will link Dover (Kent) with St. Austell (Cornwall) via the south coast of England once complete. Currently it runs uninterrupted from Bognor Regis to the west, to Littlehampton in the east.
- **3.19.** Although not specified as cycle routes, much of the surrounding highway network is conducive to cycling. In particular cycling as part of a multi-modal journey to and from Ford Rail Station is a viable travel option from the Site.

#### Walking

3.20. The existing area is served by adequate pedestrian routes enabling access on foot around the entire Site and connecting into the adjoining neighbouring communities. There are a number of Public Rights of Way (PRoWs) in the vicinity of the Site, and two routes through the Site. Both of the PRoWs routing through the Site are visible and well signposted. The southern footpath (FORD/175-1) offers direct pedestrian access from the village of Yapton (and the north of the Site) through to Climping and St Mary's Church on Ford Road/Church Lane. The northern longitudinal footpath (FORD/363-3) can be accessed to the west from Yapton, and to the east in Ford. This enables pedestrian access through the northern tip of the Site either into Yapton, Wicks Farm, or into Ford.

#### Key issues for Transport

- 3.21. Whilst the existing area around the Site in Ford is readily accessible by numerous modes of transport, the proposals for large scale residential-led development within Ford of up to 1,550 dwellings, community infrastructure and a school have the potential to bring forward a step change in the level of connectivity and accessibility in this area. Alternative choices will need to be available to accommodate the increase in the level of demand. Identification of areas in need of improvement include:
  - The lack of pedestrian crossing facilities on the B2233, with particular focus on the Horsemere Green Lane bus stop locations; and
  - Improvement in local highway infrastructures, including the level crossing at Ford railway station.
- **3.22.** It is envisaged that the following objectives will need to be addressed with reference to transport issues:
  - Design for community Putting people, and their quality of life now and in the future, at

the centre of decision making;

- Minimising the need to travel, providing choice in transport, and where travel occurs, encouraging greater use of more sustainable and healthy forms of travel; and
- Establishing priorities so that development and day to day facilities are accessible in the first instance by walking and cycling, then by public transport, then by motor vehicles.
- **3.23.** Furthermore, the suggested approach to masterplanning will be based on the following:
  - Design In terms of creating communities, where public interaction, outdoor and indoor, is the norm. Where friends and day to day activities are nearby and easy to get to, and where it is not an automatic reaction when leaving home to get into a car. The Site is well placed to take advantage of the proximity of a range of day to day facilities;
  - Choice In terms of providing the infrastructure and facilities to minimise reliance on any single option. This widens social inclusion, and for instance, on average, makes contributing to commuter car congestion more of a choice and less of a necessity;
  - Behaviour In terms of educating people in the options and consequences. It brings together awareness, health, environment and personal convenience; and
  - Network Management In terms of managing the road network in accordance with the user hierarchy preferred by the Council. Car travel is the lowest capacity network in terms of space occupied per person. It also occupies the lowest priority in the user hierarchy. This means, for instance, prioritising the reliability and speed of bus and cycle movement over that of cars in the commuter peaks.

#### **Biodiversity**

#### Baseline Data

- 3.24. A Phase 1 Habitat Survey (Figure 6) and desktop assessment have been undertaken to determine the current baseline conditions on Site which include arable fields, a hay meadow, species-poor hedgerows (comprising both native and non-native species), a short length of species-rich hedgerow, areas of unmanaged grassland, scrub, hard standing and buildings. Since completion of the Phase 1 Habitat Survey, the Site was extended to the north and as such this area has not been surveyed, however, an assessment of aerial images suggests the affected habitats are similar to those recorded across the rest of the Site. Further fieldwork would be required to confirm this.
- 3.25. Based on the findings of the Phase 1 Habitat Survey, it is considered possible that the following species are either present on Site or may make use of the Site: badgers, barn owns, hazel dormice, great crested newts, bats and common reptiles. The presence of common lizards on Site was confirmed during the Phase 1 Habitat Survey although additional work will

be required to establish the size of the population.

**3.26.** The Site has the potential to support breeding and wintering birds, some of which are of conservation concern. The areas of unmanaged grassland and scrub could support notable invertebrate communities and further assessment of these habitats will be undertaken.

#### Key issues for Biodiversity

- 3.27. The vegetation communities recorded from the field margins largely comprise common and widespread species and are of local importance. The proposals will result in the loss of arable fields and may lead to the loss of boundary features such as species-poor native hedgerows. Although the diversity of these hedgerows is low they will provide feeding and breeding habitats for a range of common birds, mammals and invertebrates. These hedgerows are considered to be of local importance.
- 3.28. The loss of unmanaged grassland and scrub on Site would lead to the reduction of a habitat that is likely to be scarce within the parish. The grassland areas are some of the most botanically rich areas within the Site.
- **3.29.** The loss of buildings and hard standing will need to be carefully considered should these contain any protected species.
- **3.30.** Included in the proposals will be the opportunity for the creation of new habitats and the potential to positively enhance the species-poor conditions currently on Site. Though the creation of species-rich hedgerows and grassland maintained by suitable management the biological interest of these areas can be enhanced.

#### Air Quality

#### Air Quality Baseline Data

#### Air Quality Monitoring

3.31. The Environment Act 1995<sup>13</sup> requires local authorities to periodically review and assess local air quality against the air quality objectives contained in the Air Quality Regulations<sup>14</sup>.

<sup>&</sup>lt;sup>13</sup> HMSO, The Environment Act 1995, July 1995. Available online: <u>http://www.legislation.gov.uk/ukpga/1995/25/introduction</u>

<sup>&</sup>lt;sup>14</sup> HMSO, The Air Quality Standards Regulations, June 2010. Available online: <u>http://www.legislation.gov.uk/uksi/2010/1001/pdfs/uksi\_20101001\_en.pdf</u>

Objectives have been set for Carbon Monoxide, Benzene, 1,3-butadiene, lead, Nitrogen Dioxide, Sulphur Dioxide and Particles (PM<sub>10</sub>).

#### Air Quality Hotspots

- 3.32. Where air quality monitoring suggests that there is a risk of exceeding an air quality objective, a Detailed Assessment should be carried out to investigate whether the objective will be exceeded. If an objective will not be met an Air Quality Management Area (AQMA) would be designated and action taken at a local level to ensure that air quality in the area improves.
- **3.33.** Air quality in Sussex is generally good and the main source of air pollution would stem from vehicles using roads. There are no AQMAs within or adjacent to Ford.

#### Air Quality Management

**3.34.** Any changes in air quality which come about as a result of the FNP are likely to be closely linked to traffic flow through the parish. The Site and its connections with the existing road network will therefore need to be carefully considered.

#### Key issues for Air Quality

- 3.35. The following presents the key issues for air quality relevant to the FNP:
  - Increased traffic flows generated by the site allocation could add to overall emissions and pollutants associated with transport (Carbon Monoxide, Benzene, 1,3-butadiene, lead, Nitrogen Dioxide, Sulphur Dioxide and Particles (PM10)), leading to worsening air quality, particularly in an area which heavily relies on the car as a mode of transport.

#### Historic Environment

#### Baseline Data

3.36. A heritage desk based assessment of the Site has established that the Site contains recorded Bronze Age, Iron Age and Roman remains. Associated remains are likely to be present within the Site. The Site also contains the remains of a WWI and WWII airfield; the airfield is considered to have low potential for remains of all other archaeological periods. The Site is located beyond the setting of nearby designated heritage assets. There have been a number of archaeological investigations within the Site that have recorded prehistoric remains.

- **3.37.** There are no designated heritage assets within the Site. The scheduled deserted medieval village of Climping lies over 500m to the south-east of the Site, and the Site is considered to lie beyond the setting of the scheduled monument. There are five listed buildings within 500m:
  - The Parish Church Of St Mary (Grade I);
  - The Vicarage (Grade II);
  - Atherington House and Ford Place and Southdown House and The Lodge (Grade II);
  - Barn to the west of Nos 1 and 2 Church Farm Cottage (Grade II); and
  - New House Farmhouse (Grade II).
- 3.38. The Site is considered to lie beyond the settings of all of these designated heritage assets. The only one that has some inter-visibility with the Site is Atherington House where the industrial buildings at the northern end of the Site can be seen from parts of the garden of the house. These buildings have a negative contribution to the significance of the house. The Site itself is considered to be outside of the setting of the house.

#### Key issues for the Historic Environment

3.39. The proposals set out in the FNP would impact features of no more than local historic interest.

#### Landscape

#### Baseline Data

#### Designations

- 3.40. The Site occupies a diverse landscape (Figure 7) and does not contain any planning designations with the exception of a Strategic Waste Site Allocation on the disused warehouse site to the north of the Sewage Treatment works. A Strategic Gap between Littlehampton and Bognor Regis and Arundel is identified in the Local Plan 2003 to the west and south of the Site which is 500m from the site at its closest point. The setting of Arundel is also protected and this is approximately 500m to the east of the Site. The South Downs National Park begins at a distance of 2km to the north of the Site.
- 3.41. There are two Conservation Areas in Yapton, the closest being at St Mary's Church, approximately 600m to the west of the Site. The Site does not contain any Listed Buildings or Scheduled Monuments (Figure 8). There are a cluster of listed buildings and ancient

earthworks protected as Scheduled Monuments at the junction of Ford Road and Horsemere Green Road around St Mary's of Climping Church. To the north-east of the Site a number of listed buildings are located around the ancient village of Ford at St Andrews-by-the-Ford and the junction of Ford Road and Ford Lane. Within the historic core of Yapton to the west of the Site there are also a number of listed buildings. There is no ancient woodland within the Site, and none of the vegetation is covered by tree preservation order.

**3.42.** A number of PRoWs cross the Site including FP363 from Yapton to Ford to the north and FP175 from Rollaston Park to Climping to the south.

#### Landscape Character

- 3.43. Figure 9 identifies the landscape character in the locality of the Site:
  - **National** The Site is covered by National Character Area 126: South Coastal Plan, NE525<sup>15</sup>. This is recognised as a flat, coastal landscape;
  - County The Site is included in SC9: Chichester to Yapton Coastal Plain which is one of the 42 unique areas, as identified by West Sussex County Council. The key characteristics of the Chichester to Yapton Coastal Plain include:
    - Low lying flat open landscape;
    - Meandering rifes and straight drainage ditch systems, with associated unimproved grassland and edged by reed beds;
    - A low density of hedgerows and hedgerow trees with occasional shelterbelts;
    - Large-scale arable farming and market gardening. Extensive farms with both traditional and modern farm buildings and silos;
    - Scattered, historically nucleated villages with mixed building materials of flint, brick, half timber and stone;
    - Large farmsteads along roads, and on dead-end tracks;
    - Long views to Arundel, the Downs and to the distinctive spire of Chichester Cathedral; and
    - The relatively open character of much of the area allows long views so that village church towers are important landmarks in views.
  - District The Site is located within Character Area 29: North of Yapton Coastal Plain

<sup>&</sup>lt;sup>15</sup> Natural England, NE525: NCA Profile 126 South Coast Plain, February 2014 <u>http://publications.naturalengland.org.uk/publication/</u> <u>4923911250640896?category=587130</u>

which has been identified by ADC in their Landscape Sensitivity Study (2006)<sup>16</sup>. This area is described as:

"Rural arable landscape falling towards Withy Rife and Arun Valley. Some heritage interest provides separation between Ford, Ford Aerodrome and Yapton/Burndell and Climping"

#### Landscape Value

**3.44.** The PRoW located within and to the west of the Site is a valuable resource for the public. The Site as a whole is assessed as exhibiting low to medium value due to its proximity to urban structures and separation from the historic centres of Ford and Yapton.

#### Visual Context

3.45. The Site is contained by roads or tracks and built development on all its boundaries which has the effect of restricting all but close range external views. Views of the Site are available from the PRoWs within the Site and these are open clear views to the extent of visual containment. Internal tree belts and hedgerows restrict the extent of the views and the whole Site is not visible in any one view.

#### Key issues for Landscape

- **3.46.** The potential constraints of urban development are:
  - Maintaining the separation of Littlehampton and Bognor Regis by including a strong landscape framework;
  - Consider the amenity of properties on Horsemere Green Lane, by locating low density housing and open space in the southern part of the Site and new planting to create a robust boundary to the Site; and
  - Maintaining and improving public rights of way by enhancing the countryside areas retained within the Site on the northern portion of the Site beside the village of Ford and the footpath links.

#### Water and Flooding

#### Baseline Data

<sup>&</sup>lt;sup>16</sup> ADC, Arun Landscape Study by Hankinson Duckett Associates, August 2006

#### Flood Risk

**3.47.** According to the Environment Agency's indicative flood map, the majority of the Site is located in Flood Zone 1, which has a low probability of flooding. A small area to the north-east of the Site is located in Flood Zone 2.

#### Topography and Geology

**3.48.** A review of the British Geological Survey (BGS) indicates that the Site is underlain by River Terrace deposits (comprising undifferentiated clay, silt sand and gravel) and the Newhaven Chalk bedrock formation.

#### Hydrology (Surface)

3.49. The River Arun is located approximately 800m to the east and runs through a series of villages before discharging into the English Channel at Littlehampton. Based on aerial images, it is perceived that a number of drainage ditches are located around the Site, which most likely lead to the River Arun.

#### Hydrogeology

**3.50.** The Site is underlain by a Secondary A and Principal aquifer, designated with regard to the superficial deposits and bedrock respectively. The Secondary A aquifer means that the Site has permeable layers capable of supporting water supplies at a local scale. The Principal Aquifer is where layers of rock have high intergranular and/or fracture permeability, meaning they usually provide a high level of water storage. They may support water supply and/ or river base flow on a strategic scale. According to the Environment Agency's groundwater map, the Site is not located within a Source Protection Zone.

#### Key issues for Water and Flooding

3.51. Table 7 identifies the issues with respect to water quality, flood risk and drainage in the context of the FNP.

#### Table 7: Flood Risk and Drainage Issues

Potential Impact	Reason
Construction	
Increase in surface water runoff during construction due to increase in impermeable area of change in vegetation extent.	Construction work will take place on an existing greenfield and brownfield site, which will result in an increase in the impermeable area, thus affecting the surface water runoff characteristics of the Site.
Impact on surface water quality.	Potential sources of contamination that could have an impact on surface water quality during the construction phase (e.g. spillages) should be identified and assessed.
Impact on the underground aquifer.	Construction will need to be carefully managed, with suitable mitigation measures in place to ensure against pollution of the groundwater and to protect local supplies.
Changes to natural drainage pattern.	Construction activities (such as clearance of vegetation, stripping top soil etc.) and vehicle movements can result in compaction, which may subsequently increase the rate and volume of surface water runoff and lead to an increased risk of localised surface water flooding. Extensive earthworks during the construction phase may also allow uncontrolled surface water to discharge offsite and into the receiving watercourse. Therefore, suitable mitigation measures will need to be implemented during the construction stage.
Operation	
Increase in risk of surface water flooding and flood risk to downstream receptors.	The impermeable area will increase as a result of the proposed development and will generate a higher rate of surface water runoff. Therefore, suitable mitigation measures will need to be reviewed as part of the SEA to confirm that the proposed development does not increase the risk of flooding, either on or offsite.
Risk of Site flooding from other sources (groundwater, sewer etc).	The risk of flooding from other sources will be reviewed as part of the Flood Risk Assessment. Any risks will be outlined, with recommended mitigation measures to ensure that the proposed development will not increase flood risk elsewhere.
Impact on surface water quality.	Potential sources of contamination that could have an impact on surface water quality and enter River Arun should be identified and assessed.
Impact on the underground aquifer.	Whilst the Site does not lie within a source protection zone, proposed sources of contamination should be identified and assessed.
Changes to natural drainage pattern.	In accordance with NPPF, all surface water drainage will be engineered such that there is no resultant risk of flooding to properties on Site and no increased risk of flooding off Site for all storm events up to and including the 1in100 year event with 30% allowance for climate change.

Potential Impact	Reason
Impact on foul flows as a result of the proposed development.	The proposals will result in additional foul flows. Foul capacity will be confirmed as part of a Pre-Development Enquiry with Southern Water. It may be necessary to undertake an Impact Study to identify the effect that discharge from the proposals will have on the existing network, and establish any upgrades that may be required.

#### 3.52. The potential sensitives on Site could be:

- Flood risk to residential properties adjacent to and downstream of the Site;
- Existing ditch network and River Arun;
- Underlying aquifer (groundwater); and
- Existing public sewer infrastructure.

#### Land Contamination

#### Baseline Data

- 3.53. Although land contamination is not considered a major issue in Ford, the Site contains the former Ford airfield which was used during WWI and WWII and is now a small industrial site which includes Ford Prison.
- **3.54.** There is a small area of historic landfill located in the north of the Site. 'Bank East of Hanger 2' historic landfill site was used for inert waste and waste was last received in August 1986.

#### Key issues for Land Contamination

3.55. There may be land contamination on Site from fuel tanks and previous military uses, however there is no evidence of anything at present. Pipe mines were removed in 1998 by the Ministry of Defence.

#### **Climatic Factors**

#### Baseline Data

3.56. Climatic factors are likely to result in a range of direct and indirect effects on the natural and

built environments, with current projections suggesting that the south-east will experience hotter, drier summers and warmer, wetter winters.

3.57. The outcome of research on the probable effects of climate change in the UK has been released by the UK Climate Projections (UKCP09)<sup>17</sup>. UKCP09 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 as the potential range of changes. Table 8 shows the central estimates for a medium emissions scenario for the south-east region within which Ford lies.

	202	20s	2050s					
	Lowest Change	Highest Change	Lowest Change	Highest Change				
Hotter Summers	+0.5°C	+2.8°C	+1.1°C	+5.2°C				
W a r m e r Winters	+0.5°C	+2.2°C	+0.9°C	+3.8°C				
Drier Summers	-26% change in rainfall	+18% change in rainfall	-43% change in rainfall	+16% change in rainfall				
W e t t e r Winters	-4% change in rainfall	+20% change in rainfall	+1% change in rainfall	+40% change in rainfall				

#### Table 8: Central Estimates for Medium Emission Scenarios for the South East Region

Source: UK Climate Projections, 2009

#### Greenhouse Gas Emissions

3.58. The carbon footprint of West Sussex is around 17.3 tonnes per average resident and just over a quarter (27%) of this was attributed to fuel use in homes and cars<sup>18</sup>. Within Arun, the largest contributors to personal emissions of  $CO_2$  stem from personal flights (13.3%), food and drink from retail (12.1%) and domestic vehicle fuel (10.7%).

#### Key Issues for Climatic Factors

- **3.59.** The following presents the key issues relevant to Ford for the climatic factors sustainability theme:
  - Potential increases in greenhouse gas emissions linked to an increase in the built footprints of the town. This includes increased car use and travel, housing provision and

<sup>&</sup>lt;sup>17</sup> UK Climate Projections, 2009. Available online: http://ukclimateprojections.metoffice.gov.uk/23122

<sup>&</sup>lt;sup>18</sup> West Sussex County Council, West Sussex Life, October 2014. Available online: <u>https://www.westsussex.gov.uk/about-the-council/information-and-data/reports/west-sussex-life/</u>

employment;

- Road transport constitutes one of the largest contributors to Carbon Dioxide emissions in the Arun District. The FNP should seek to limit emissions from these sources through energy efficiency, renewable energy provision and the promotion of sustainable transport; and
- The FNP should seek to support adaptation to risks linked to climatic factors through appropriate design and layout, and the incorporation of features which will maximise the resilience of the town to the effects of climate change, such as sustainable drainage systems.

# 4. **CONSIDERATION OF ALTERNATIVES**

- 4.1. Effective neighbourhood plan-making considers the existing context of the area and the development issues it aims to manage. As such, a draft plan does not emerge in isolation, but is developed though an iterative process, where alternatives are considered before a single draft Plan is brought forward for formal consultation. The SEA process is designed to consider the effects of key strategic alternatives and present the findings to assist the planmaking process.
- **4.2.** Those possible alternatives which could be considered as part of the FNP SEA are:
  - The 'do nothing' alternative The 'do nothing' alternative would be to not prepare a neighbourhood plan. Under this scenario, future planning control would be less sensitive to local needs, there would be a lost opportunity for community involvement to help shape development best suited to the local area and needs;
  - The wider land in Ford Parish Figure 1 identifies the neighbourhood planning area designated for Ford which includes a larger extent of land than the Site chosen to bring forward the neighbourhood plan proposals (Figure 2). Following ongoing consultations with the Neighbourhood Planning Steering Group and the public, the chosen Site within Ford needed to build a 'heart to the parish' and the airfield was considered the most appropriate location to deliver this vision.
  - Development Options The Ford Neighbourhood Plan has been prepared to assist ADC with increasing the provision of housing within Arun. Proposals for the Neighbourhood Plan have evolved and incorporated different options to assist ADC will their local housing need. This SEA Scoping Report assesses the development of up to 1,550 dwellings on Ford, however previous options for dwelling numbers have ranged from 750 to 3000. Figure 10 shows the illustrative masterplan for Ford airfield for the development of up to 1,550 dwellings which has since been adapted to accommodate the increase to up to 1,550 (Figure 3). Furthermore, consultations with the public have assisted with the development of the proposals and these options will be assessed and appraised against that option taken forward for Ford Airfield.

### 5. THE SEA FRAMEWORK

#### SEA Framework for Ford Neighbourhood Plan

- 5.1. The FNP will be assessed using an SEA Framework. The proposed SEA Framework is primarily based on the sustainability objectives set out in ADC's Emerging Local Plan Sustainability Appraisal. Following a review of this document, the relevant environmental objectives were identified in relation to the Neighbourhood Plan and have been incorporated into the SEA Framework; these are:
  - SEA Objective 1: Ensure Efficient and Sustainable Movement within and beyond Ford;
  - SEA Objective 2: Enhance Ford's Environmental Integrity; and
  - SEA Objective 3: Maximise Natural Resource Efficiency.
- 5.2. The SEA Framework provides a way of ensuring the Site and proposed policies within the neighbourhood plan consider the needs of the area in terms of their environmental effects. The SEA topics identified in Annex I(f) of the SEA Directive are one of the key determinants when preparing the SEA Framework and will draw upon baseline information, key issues and be distinct from the objectives of the neighbourhood plan, although may overlap in some cases.
- 5.3. Table 9 below provides a matrix for the assessment against the objectives identified above. Each SEA topic will be assessed against each objective and the relevant criteria required to meet that objective. The assessment will form the next stage of the SEA Process (Stage B/C in Table 1).

#### **Table 9: The SEA Framework**

Topic SEA Object		Criteria	Assessment (to be completed during Stage B/C)								
	SEA Objective		++	+	0/ +	0	0/-	-		0/- -	
and Sustainable Movement with beyond Ford <b>SEA 2:</b> Enhand	and Sustainable Movement within and	Traffic Congestion Road Safety									
		Public Transport									
		Walking and Cycling									
	<b>SEA 2:</b> Enhance Ford's Environmental Integrity	Local Distinctiveness									
		Historic Environment									
		Designated Environmental Sites									
		Biodiversity									
		Water Quality									
		Flood Risk									
		Air Quality									
		Noise Pollution									
		Land Contamination									
	SEA 3: Maximise Natural Resource	Energy Supply and Demand									
	Efficiency	Waste									
		Water Resources									
		Efficient Use of Land									
		Soil Quality									
Biodivers	SEA 1: Ensure Efficient	Traffic Congestion									
ity	and Sustainable Movement within and beyond Ford	Road Safety									
beyo SEA		Public Transport									
		Walking and Cycling									
	<b>SEA 2:</b> Enhance Ford's Environmental Integrity	Local Distinctiveness									
		Historic Environment									

	SEA Objective		Assessment (to be completed during Stage B/C)										
Торіс		Criteria	++	+	0/	0	0/-	-		0/-			
		Designated			+					-			
		Environmental Sites											
		Biodiversity											
		Water Quality											
		Flood Risk											
		Air Quality											
		Noise Pollution											
		Land Contamination											
	SEA 3: Maximise Natural Resource	Energy Supply and Demand											
	Efficiency	Waste											
		Water Resources											
		Efficient Use of Land											
		Soil Quality											
Air	<b>SEA 1</b> : Ensure Efficient and Sustainable Movement within and beyond Ford	Traffic Congestion											
Quality		Road Safety											
		Public Transport											
		Walking and Cycling											
	<b>SEA 2:</b> Enhance Ford's Environmental Integrity	Local Distinctiveness											
		Historic Environment											
		Designated Environmental Sites											
		Biodiversity											
		Water Quality Flood Risk											
		Air Quality Noise Pollution											
	CEA 2. Movimies	Land Contamination											
	SEA 3: Maximise Natural Resource	Traffic Congestion											
		Road Safety											

	SEA Objective		Assessment (to be completed during Stage B/C)										
Торіс		Criteria	++	+	0/ +	0	0/-	-		0/- -			
	Efficiency	Public Transport											
		Walking and Cycling											
Historic	SEA 1: Ensure Efficient	Traffic Congestion											
Environm	and Sustainable	Road Safety											
ent	Movement within and	Public Transport											
	beyond Ford	Walking and Cycling											
	SEA 2: Enhance Ford's	Local											
	Environmental Integrity	Distinctiveness											
		Historic											
		Environment											
		Designated											
		Environmental Sites											
		Biodiversity											
		Water Quality											
		Flood Risk											
		Air Quality											
		Noise Pollution											
		Land Contamination											
	SEA 3: Maximise	Traffic Congestion											
	Natural Resource Efficiency	Road Safety											
		Public Transport											
		Walking and Cycling											
Landscap	<b>SEA 1</b> : Ensure Efficient and Sustainable	Traffic Congestion											
е		Road Safety											
	Movement within and beyond Ford	Public Transport											
		Walking and Cycling											
	<b>SEA 2:</b> Enhance Ford's Environmental Integrity	Local Distinctiveness											
		Historic Environment											
		Designated Environmental Sites											
		Biodiversity											

	SEA Objective		Assessment (to be completed during Stag B/C)										
Торіс		Criteria	++	+	0/ +	0	0/-	-		0/- -			
		Water Quality											
		Flood Risk											
		Air Quality											
		Noise Pollution											
		Land Contamination											
	SEA 3: Maximise	Traffic Congestion											
	Natural Resource	Road Safety											
	Efficiency	Public Transport											
		Walking and Cycling											
Water	SEA 1: Ensure Efficient	Traffic Congestion											
and	and Sustainable	Road Safety											
Flooding	Movement within and beyond Ford	Public Transport											
		Walking and Cycling											
	<b>SEA 2:</b> Enhance Ford's Environmental Integrity												
		Distinctiveness											
		Historic											
		Environment											
		Designated											
		Environmental Sites											
		Biodiversity											
		Water Quality											
		Flood Risk											
		Air Quality											
		Noise Pollution											
		Land Contamination											
	SEA 3: Maximise	Traffic Congestion											
	Natural Resource	Road Safety											
	Efficiency	Public Transport											
		Walking and Cycling											
Land	SEA 1: Ensure Efficient	Traffic Congestion											
Contamin	and Sustainable	Road Safety											
ation	Movement within and	Public Transport											
	beyond Ford	Walking and Cycling											

Торіс	SEA Objective	Criteria	Assessment (to be completed during Stage B/C)										
			++	+	0/ +	0	0/-	-		0/- -			
	<b>SEA 2:</b> Enhance Ford's Environmental Integrity	Local Distinctiveness											
		Historic Environment											
		Designated Environmental Sites											
		Biodiversity											
		Water Quality											
		Flood Risk											
		Air Quality											
		Noise Pollution											
		Land Contamination											
	SEA 3: Maximise	Traffic Congestion											
	Natural Resource Efficiency	Road Safety											
		Public Transport											
		Walking and Cycling											
Climatic	SEA 1: Ensure Efficient	Traffic Congestion											
Factors	and Sustainable	Road Safety											
	Movement within and beyond Ford	Public Transport											
		Walking and Cycling											
	<b>SEA 2:</b> Enhance Ford's Environmental Integrity	Local Distinctiveness											
		Historic Environment											
		Designated Environmental Sites											
		Biodiversity											
		Water Quality											
		Flood Risk											
		Air Quality											
		Noise Pollution											
		Land Contamination											
	SEA 3: Maximise	Traffic Congestion											

#### Ford Neighbourhood Plan

	SEA Objective	Criteria	Assessment (to be completed during Stage B/C)										
Торіс			++	+	0/ +	0	0/-	-		0/- -			
	Natural Resource	Road Safety											
	Efficiency	Public Transport											
		Walking and Cycling											

# 6. CONSULTATION ON THE SCOPING REPORT AND NEXT STEPS

#### Consultation

6.1. The SEA Regulations state that a Scoping Report shall be prepared which will be the subject of consultation with statutory consultation bodies for a minimum of five weeks. The SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public at the scoping stage. Regulation 12 (5) of the Environmental Assessment of Plans and Programmes Regulations 2004 states that:

"When deciding on the scope and level of detail of the information that must be included in the report the responsible authority shall consult the consultation bodies"

6.2. The statutory consultation bodies are Historic England, the Environment Agency and Natural England. In addition to the required consultees this Scoping Report will also be sent to key stakeholders and organisations.

#### Next Steps

6.3. The completion of Stage A (scoping stage), as identified in Table 1, will ensure that the sustainability framework used within the report is appropriate and that all of the significant sustainability issues for Ford have been considered. Following this, Stage B will be carried out which will aim to consult on the scope of the SEA and assess the effects of the FNP against the agreed SEA Framework.

# **Appendix 1**

# **SEA Screening Opinion**

# **Appendix 2**

**Annex I of the SEA Directive** 

# Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment

Annex 1: Information for Environmental Reports (referred to in Article 5(1))

Requirement	Location in this report
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Section 1.7, Section 3, Appendix 3
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 3
3. The environmental characteristics of areas likely to be significantly affected.	Section 3
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Council Directive 92/43/EEC on the conservation of habitats and species.	Section 3
5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Appendix 3
6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between these factors.	Next stage of SEA
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Next stage of SEA
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Next stage of SEA
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Next stage of SEA
10. A non-technical summary of the information provided under paragraphs 1 to 9.	Next stage of SEA

# **Appendix 3**

**Review of Plans, Programmes and Policies**