

Arundel Neighbourhood Plan 2014 - 2029

Strategic Environmental Assessment



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1. Introduction

1.1 The purpose of this report is to provide an assessment of any significant environmental effects resulting from the policies and proposals of the Submission Neighbourhood Development Plan for Arundel ("the Neighbourhood Plan") in accordance with EU Directive 2001/42 on strategic environmental assessment (SEA).

1.2 The Neighbourhood Plan has been published for submission by Arundel Town Council under the Neighbourhood Planning Regulations 2012, and as required by Arun District Council and the South Downs National Park Authority, as the local planning authorities.

1.3 The SEA report of the Submission Neighbourhood Plan provides an assessment of the policy contents and seeks to do in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts.

2. Background to Strategic Environmental Assessment

2.1 Strategic Environmental Assessment (SEA) involves the evaluation of the environmental impacts of a plan. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the "Environmental Assessment of Plans or Programmes Regulations 2004" as follows:

- 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 Directives 79/409/EEC and 92/43/EEC
- The environmental protection objectives, established at international, community or 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
- 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

- The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan
- 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
- A description of measures envisaged concerning monitoring in accordance with Article 10

2.2 Since 2004, the requirement for SEA of relevant plans and programmes has been aligned with the similar process of Sustainability Appraisal (SA) in the UK. During the preparation of the Neighbourhood Plan, the Government confirmed that an SA is not required of a Neighbourhood Plan but that SEA may still be necessary in circumstances where policies may have a significant environmental effect.

2.3 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan in a relatively small parish area. It focuses only on the requirements of SEA and does not extend to cover the wider sustainability attributes of a Sustainability Appraisal.

2.4 It began with the identification in the published 'State of the Town' report of all the environmental assets in the parish. This report was consulted upon with the local planning authorities and other statutory consultees as per the Directive. During the preparation of the Pre Submission Neighbourhood Plan, an appropriate number of environmental objectives and measures were selected from the Arun Intended Full Sustainability Appraisal of May 2013 as being the most relevant for assessing the impact of the Revised Neighbourhood Plan policies on designated environmental assets.

2.5 This section now assesses the potential environmental impacts of the objectives and policies of the submission version of the Neighbourhood Plan. It responds to each of the SEA requirements in turn, beginning with a short description of the Neighbourhood Plan, identifying the key environmental features of the parish and then assessing the impact of the strategic objectives and policies of the Neighbourhood Plan on those features, using a number of SEA objectives and measures.

3. An outline of the contents, main objectives of the Neighbourhood Plan and relationship with other relevant plans or programmes

3.1 The Neighbourhood Plan contains a number of policies for the use and development of land in the parish of Arundel in the plan period from 2014 to 2029. These policies, together with the policies of the Arun development plan - that is the saved policies of the 2003 Local Plan and those that will eventually replace them in the new Arun Local Plan ("the Submission Local Plan") and the emerging South Downs National Park Local Plan - and the National Planning Policy Framework (NPPF), will be used by the local planning

authorities in determining planning applications should the Neighbourhood Plan be adopted in due course.

3.2 The Vision of the Neighbourhood Plan is:

"By 2029, Arundel will have retained its status as one of England's most significant historic towns and will have become a key destination of the South Downs National Park. Its variety of heritage assets and their setting will have been successfully protected and enhanced for the benefit of local people and visitors alike.

At the same time, the town will have grown modestly to provide wider housing opportunities of a range of types to meet local demand and need. This will have bolstered the town's shops, services and community facilities. Over this period Arundel's reputation as an important market town, cultural centre and creative hub will grow.

The town will also have benefited from a scheme to alleviate traffic congestion on the A27, from works to manage traffic within the town and from improvements to the local rail network and facilities to encourage greater use of rail services for commuting and other trips.

Along with neighbouring parishes, the town will have benefited from investment in the long term security of its flood defences and will have avoided significant development in the flood plain."

3.3 In pursuit of this Vision, the Neighbourhood Plan contains six strategic objectives and specific measures:

1. To maintain and enhance the nationally important heritage assets and special character of the town and its setting:
 - No development permitted that is detrimental to any heritage asset or its setting
 - Buildings and structures of special character offered greater protection from harmful development
2. To plan and deliver a range of housing mix and types in locations with good access to services and facilities by foot, bicycle and bus as well as car:
 - New homes built on previously used land in or adjoining the built up area
3. To secure the long term future of community and cultural facilities that help make the town special:
 - New and/or improved multi-purpose community and cultural facilities
 - Assets of community value designated
4. To sustain a thriving town centre offering a range of independent goods and services to the local community and visitors:
 - No loss of town centre uses

- Continued dominance of independent retail and service providers in town centre
 - Increase in offices and cultural sector businesses
5. To reduce the harmful impact of road traffic on the local community and the town's heritage assets
- Improvements to the A27
 - Traffic and car parking management in town centre and other problem locations
 - Increase in the number of local journeys undertaken by walking, cycling and public transport
6. To plan for climate change and work in harmony with the environment to conserve natural resources:
- New flood defences
 - No harmful development in the South Downs National Park or other open countryside
 - Development on previously used land

3.4 The Neighbourhood Plan sets out a range of housing, retail, traffic and community asset policies. These policies are each assessed in section 6 of the SEA below.

4. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the Neighbourhood Plan

4.1 The State of the Town Report for the Neighbourhood Plan published by the Town Council in December 2012 identified the key features of the local environment. These are:

- The northern half of the parish of Arundel falling in the South Downs National Park
- one Site of Special Scientific Interest at Arundel Park
- no local nature reserves
- significant ancient woodland within the South Downs National Park boundary
- a large Site of Local Importance for Nature Conservation within the South Downs National Park boundary
- two West Sussex Sites of Nature Conservation Importance at Rewell Wood and at Binsted Wood
- 215 listed buildings and structures (including the Grade I Arundel Castle, Church of St. Nicholas, Fitzalan Chapel and Roman Catholic Cathedral of St. Philip Neri and the Grade II* Hiorn's Tower, 22 High Street (Norfolk Hotel), 51 High Street, 61 High Street, The Priory (St. Wilfred's) and 26 Maltravers Street (The Vicarage))
- a Conservation Area comprising the majority of the town area
- three Scheduled Ancient Monuments at Arundel Castle, Arundel Mediaeval Blackfriars and Tortington Priory
- a listed Park & Garden (Arundel Park)

4.2 The quality and status of the local natural and built environment is therefore of considerable importance to future planning decisions in the town and parish and the environmental designations identified above form the baseline data for the assessment.

4.3 Should the Neighbourhood Plan not be adopted then decisions on future planning applications will be made using the policy provisions of the Arun and South Downs National Park development plans and the NPPF. Given the limitation on the Neighbourhood Plan to make only local and not strategic planning policy for the parish, the current state of these environmental features will not be affected by a failure to adopt or to implement the Neighbourhood Plan.

5. The environmental characteristics of areas likely to be significantly affected

5.1 The designated environmental features of the parish are identified in the Neighbourhood Plan and above. The location of the part of the parish, and especially the northern landscape setting of the town, within the National Park requires a sensitivity of the Neighbourhood Plan to meeting its strategic objectives. The landscape character of this part of the National Park has been assessed as having generally low to negligible capacity for development.

5.2 The town of Arundel is of significant national heritage importance. Its variety and high concentration of Listed Buildings in the Arundel Conservation Area, which covers most the town east of the A27, require special attention to be paid to the duty to protect and conserve this importance. The topography of the town in long views to the south across the flood plain of the River Arun to the coast makes these heritage assets especially prominent in the landscape.

5.3 In addition, the extensive presence of ancient woodland and some designated nature conservation sites in and around the parish boundary complements the visual value of the natural landscape. The designated watercourse in the parish - the River Arun - is prone to flood events, although defended.

6. Any existing environmental problems that are relevant to the Neighbourhood Plan

6.1 There are no specific environmental problems to which the Neighbourhood Plan is intended to directly respond. Those problems that do require addressing, rising from traffic congestion on the A27 and long term flood defence improvement - will be more effectively done so by the Arun and South Downs National Park development plans and the NPPF, together with the management and investment plans and programmes of other bodies, e.g. Environment Agency, Highways Agency.

6.2 The primary purpose of the Neighbourhood Plan is to take responsibility for allocating land in the parish for new housing development in the plan period, in accordance with the new Local Plan and the NPPF. It aims to do so by minimising the environmental impact of the allocations by selecting suitable sites, when considered along other social and economic policy objectives.

7. The environmental protection objectives that are relevant to the Neighbourhood Plan and the way those objectives and any environmental considerations have been taken into account during its preparation

7.1 The Neighbourhood Plan has been prepared with the assumption that the Arun and South Downs National Park development plans will contain all the appropriate policies to protect the local environment, based on the saved policies of the 2003 Local Plan and on those of the Submission Local Plan. It does not therefore seek to repeat, refine or qualify such policies.

8. The likely significant effects on the environment

8.1 To assess the likely effects of the Neighbourhood Plan on the environment, the environmental objectives used by the Arun Intended Full Sustainability Appraisal of May 2013 have been adopted. This report adopts an overarching environmental objective – to enhance Arun's environmental integrity – and sub-divides it into eleven more detailed objectives.

Neighbourhood Plan SEA Objective	Neighbourhood Plan SEA Measures
Local Distinctiveness	<ul style="list-style-type: none"> incursions of development into surrounding landscapes development locations and design conserving the setting of Arundel
Historic Environment	<ul style="list-style-type: none"> buildings of Grade I and II* and scheduled monuments at risk; number of Conservation Areas with appraisals and management proposals; number of Listed Buildings in the District
Designated Environmental Sites	<ul style="list-style-type: none"> condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC & Ramsar); area of ancient woodland within the District; number of planning applications approved in the National Park development avoiding areas of biodiversity interest

Flood Risk	<ul style="list-style-type: none"> • number of properties at risk from flooding, as defined by the Environment Agency; • number of planning applications approved contrary to advice given by the EA on flood risk/flood defence grounds.
Land Contamination	<ul style="list-style-type: none"> • area of land reclaimed/de-contaminated

8.2 The five environmental sub-objectives considered to be of relevance to the Neighbourhood Plan are set out below, together with the measures identified for each objective. An additional sub-objective has been added to the previous list – Local Distinctiveness – to provide a more rounded assessment.

8.3 The assessment of the strategic objectives and policies of the Neighbourhood Plan against the baseline data in section 4 of this report is made using the following notation: + positive; 0 neutral; and - negative.

8.4 In most cases, it is acknowledged the data is not collected or reported at a parish scale to enable an accurate assessment. In addition, the scale of development proposed in the Neighbourhood Plan is too small in comparison with the scale of existing development in the town, making the identification of cause-and-effect relationships between inputs and outputs very uncertain. However, the assessment does seek to identify the relative attributes of the policies of the Neighbourhood Plan to inform the reader.

Assessing the impact of the Neighbourhood Plan Strategic Objectives

8.5 The six strategic objectives of the Neighbourhood Plan are outlined in Section 4 of the Neighbourhood Plan. They cover a range of economic, social and environmental issues in support of realising the Vision. Each of these objectives is assessed against the SEA objectives below.

8.6 The intention of the Neighbourhood Plan to allocate land for housing development, and the scarcity of previously-developed land within the built up area boundary that is in Flood Zone 1, means that in respect of flood risk, there will be a potential negative impact. However, the specific policies make clear that not only are there strong social benefits providing a rationale for this, but planning applications will have to include Flood Risk Assessments to demonstrate how such risks will be managed and mitigated.

8.7 The intention of the Neighbourhood Plan to allocate land for housing development, combined with the scarcity of previously developed land in Flood Zone 1, means that there is a conflict between the Objective 2 of the Plan (to plan and deliver a range of housing mix and types in locations with good access to services and facilities by foot and bus as well as car) and the SEA objective relating to Flood Risk. The policies in the Plan have therefore included explicit references to the need for flood risk assessments to address

this matter in future planning applications. In many other respects, the relationship between the Neighbourhood Plan objectives and the key environmental measures is complementary, with the prospective of considerable positive environmental impacts. At the very least, impacts will be neutral.

Neighbourhood Plan SEA Objective	Neighbourhood Plan Strategic Objectives					
	1: Heritage Assets	2: Housing Supply	3: Community	4: Town Centre	5: Traffic	6: Climate Change
Local Distinctiveness	+	+	0	+	0	0
Historic Environment	+	+	0	+	+	0
Designated Environmental Sites	+	0	0	0	+	+
Flood Risk	0	-	0	0	0	+
Land Contamination	+	+	0	0	0	0

Assessing the impact of the Neighbourhood Plan policies

8.8 The Neighbourhood Plan contains the following policies, which may have an impact on the key environmental features identified in section 4 of this report. The assessment has compared the proposed policy with the Plan not having a policy but also explains to what extent there were other plausible options available.

Policy 2 - A Spatial Plan for the Parish

8.9 The policy directs development to using previously-developed land within Arundel town. In doing so, it will avoid development extending on to green field sites outside the built up area boundary and it will encourage the reuse and remediation of derelict and contaminated land.

8.10 This will have a positive impact on maintaining the distinctive character of Arundel by avoiding any landscape impact. Conversely, a policy that does not give this direction will not offer sufficient protection of green field sites.

8.11 The policy may have negative impacts on the historic environment if not located and designed to reflect the appearance and setting of heritage assets but this is a matter for other development plan policies to manage.

Similarly, part of the built up area boundary falls outside of Flood Zone 1 but negative impacts can be avoided or mitigated by site selection.

8.12 The option of no policy would have a neutral impact as existing development plan policy would direct future development in a similar way.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	+	-
Historic Environment	0	0
Designated Environmental Sites	+	0
Flood Risk	0	0
Land Contamination	+	0

Policy 3 - Housing Supply

8.13 The policy proposes a housing supply target for the plan period and the site selection criteria by which sites will be identified. As with the general direction of Policy 2, this policy requires sites to be within the built up area boundary and on previously used land (or adjoining land that will enable proposals to be viable). It also provides for the identification of land not yet available but suited to housing use in these locations.

8.14 The impacts of this policy are generally positive as with Policy 2 as reusing derelict land will enhance the local distinctiveness of Arundel and remove likely land contamination. The only potential negative effect is in managing flood risk, given the location of parts of the existing town on land subject to flood risk. However, that land is currently protected by flood defences, for which there are plans to upgrade to improve protection into the longer term. The policy also restates the requirement for future flood risk assessments to demonstrate that satisfactory design measures are possible to mitigate flood risk.

8.15 The option of not having a policy on this would likely have a negative impact as the ability to manage housing proposals using development plan policy alone may be hindered. The option of delivering fewer homes would likely be in conflict with the development plan and would not, in any event, be likely to secure a successful referendum vote. The option of delivering more than 90 homes would also not likely win the support at a referendum. Neither option is assessed in the SEA as neither is regarded as a reasonable alternative.

8.16 The only plausible alternative option would have been to propose criteria for housing development on land outside the built up area boundary. Where such land falls outside a flood risk zone then that its impact on flood risk would be neutral, rather than potentially negative. However, on all other measures the option of green field development beyond the urban area may detract from the distinctiveness of the town and its surrounding high landscape quality and may harm the setting of its nationally significant heritage assets or the quality of designated environmental sites.

Neighbourhood Plan SEA Objective	Proposed Policy	Alternative Policy
Local Distinctiveness	+	-
Historic Environment	0	-
Designated Environmental Sites	0	-
Flood Risk	-	0
Land Contamination	+	0

Policy 4 - Housing Site Allocations

8.17 This policy proposes three specific housing site allocations that are the only sites that meet the criteria in Policy 3. The River Road site will lead to the reuse of a vacant listed building and the redevelopment of its derelict curtilage in an important part of the Conservation Area. Its impact on the historic environment and on addressing land contamination is therefore positive.

8.18 The Ford Road site only very partially falls within the defended Flood Zone 2. However, by allocating the site will enable the viable redevelopment of the former gas works land, which will remove land contamination and it will improve the setting to the Conservation Area on a prominent site. The Castle Stables site will enable the reuse of a vacant stables complex of important heritage value but no longer viable for a commercial equestrian use. The site will have design constraints to ensure the special character of the buildings and of the scheduled castle grounds are conserved.

8.19 As no other sites met the Policy 3 criteria, none have been assessed as options. A no policy option would be neutral for the most part, given development plan policy, but may miss the opportunity of bringing forward the Ford Road and Castle Stables sites in the way proposed.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	+	0
Historic Environment	+	0
Designated Environmental Sites	0	0
Flood Risk	0	0
Land Contamination	+	-

Policy 5 – Land at Fitzalan Road

8.20 The policy identifies this existing primarily industrial site inside the built up area boundary as suited to housing development in the later part of the plan period if it becomes available. Its redevelopment would make a positive contribution to the setting of the Conservation Area and would remove possible ground contamination from the past industrial uses of the site.

8.21 The site falls in Flood Zone 3a but the successful recent redevelopment for housing of adjoining sites has shown that it is possible to successfully manage flood risk in this location. There are also plans for improving the standards of the Arundel flood defences within the plan period.

8.22 There are no other sites that have been identified in the built up area offering this potential. No policy would result in the continuation of an industrial use that does not enhance the setting of the Conservation Area and that may have land contamination. Worse, without this site, there would be pressure on the Plan to identify green field sites to achieve its housing target.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	+	-
Historic Environment	+	-
Designated Environmental Sites	0	0
Flood Risk	-	0
Land Contamination	+	-

Policy 6 – Transport, Access & Car Parking

8.23 The policy proposes a series of initiatives aimed at addressing the environmental impacts of traffic on the health and amenities of local people and on the heritage assets of the town.

8.24 It firstly seeks to promote walking, cycling and the use of public transport as alternatives to the private car for journeys within the town. This will have important environmental benefits, especially in reducing the harmful effects of vehicle-derived air pollution and vibration on the many heritage assets of the town. Its promotion of the local footpath and cycle route network, especially for tourists/visitors, may lead to fewer car journeys around the historic town.

8.25 Secondly, the policy encourages the two primary schools in the town to improve their car parking arrangements to address safety concerns but also to promote non-car journeys to and from school. Both identified locations are in environmentally sensitive locations in respect of the setting of the National Park and Arundel Castle and of ancient woodland. The Plan encourages the schools to bring forward proposals that acknowledge the local environmental constraints provided they also explore ways of encouraging fewer car trips as well. The no policy option is neutral as its consequences are social, in respect of child and parent safety and of local resident amenity, rather than environmental.

8.26 Thirdly, the policy supports the implementation of proposals to enhance pedestrian access from the town to the railway station on The Causeway. The proposals will make the route safer for pedestrians. It will therefore help ease traffic congestion, which in turn may reduce the impacts of that congestion on the historic town centre and encourage more people to walk rather than drive to the station.

8.27 Fourthly, the policy supports the principle of resolving the harmful impact of traffic on Arundel resulting from congestion on the A27 strategic route. It accepts that the Arundel Neighbourhood Plan cannot make a specific proposal for a highway scheme of this strategic status. Rather, it supports agencies undertaking further feasibility work to address the harmful environmental impacts of the existing road alignment. As such there is no firm proposal to assess, though the environmental benefits for removing unnecessary traffic from the historic town centre as it seeks to avoid the congestion will have a positive impact in principle.

8.28 Finally, the policy seeks to manage the impact of the demand for town centre parking from residents and visitors through the development of a Parking in Arundel Strategy. The outcome of the strategy should be a better arrangement of on street and off street car parking in the town, a beneficial environmental impact of which will be on improving the historic street scene of the town centre.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	+	0
Historic Environment	+	-
Designated Environmental Sites	+	0
Flood Risk	0	0
Land Contamination	0	0

Policy 7 – Victoria Institute

8.29 The policy supports the beneficial reuse of this important community asset.

8.30 The building is Grade II listed and so the policy will have a positive impact in encouraging future investment for its protection. No policy may not provide the stimulus to potential investors.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	0	0
Historic Environment	+	-
Designated Environmental Sites	0	0
Flood Risk	0	0
Land Contamination	0	0

Policy 8 – Arundel Lido

8.31 The policy supports the extension of leisure and community facilities at the popular Lido facility in the National Park.

8.32 The likely extent of any such proposal will be minor in comparison to the scale of the existing facility but proposals will be expected to acknowledge the sensitive landscape location of the site to minimise its environmental impact.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	0	0
Historic Environment	0	0
Designated Environmental Sites	0	0
Flood Risk	0	0
Land Contamination	0	0

Policy 9 – Mill House Farm

8.33 The policy supports the reuse and development of the building and surrounding land that is listed as a Building of Character.

8.34 In bringing the building back in to good repair and improving the land, the policy will improve the setting to the Conservation Area and National Park at this prominent location. It will also ensure that provision is made to safeguard land for flood defence improvement. No policy will result in these opportunities being missed.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	0	0
Historic Environment	+	-
Designated Environmental Sites	0	0
Flood Risk	+	0
Land Contamination	+	-

Policy 10 – Assets of Community Value

8.35 This policy proposes the designation by the local planning authority of Assets of Community Value under the Localism Act 2011. Each identified asset is considered to meet the criteria for inclusion on a list of those assets to which the Community Right to Bid applies.

8.36 The policy has a positive impact in respect of those proposed assets that are already designated heritage assets by providing a contingency for the future closure of their operations. This may prevent them falling into disrepair.

The option of not having a policy will result in less of an opportunity for the local community to have a contingency plan and so is assessed as a negative impact.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	0	0
Historic Environment	+	-
Designated Environmental Sites	0	0
Flood Risk	0	0
Land Contamination	0	0

Policy 11 – Local Green Spaces

8.37 The policy proposes the designation of three Local Green Spaces by way of their value to local people in terms of recreation and special landscape character.

8.38 Their designation will protect the spaces from development for the plan period and beyond. The Horse's Field site is a green field outside the built up area boundary with an historic landscape feature. No policy may weaken the protection of the sites from future development.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	+	-
Historic Environment	0	0
Designated Environmental Sites	0	0
Flood Risk	0	0
Land Contamination	0	0

Policy 12 – Flood Defences

8.39 The policy safeguards land for the purpose of carrying out future works to improve the existing flood defences to Arundel.

8.40 This will have a positive impact on protecting heritage and natural assets that may be affected by future flood events created by climate change.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	0	0
Historic Environment	+	0
Designated Environmental Sites	+	0
Flood Risk	+	0
Land Contamination	0	0

Policy 13 – Buildings and Structures of Character

8.41 The policy proposes the continued designation of the Buildings of Character in respect of those buildings and structures already identified under saved Policy GEN22 of the Local Plan and in the subsequent Buildings and Structures of Character Supplementary Planning Document of 2005.

8.42 This will have a positive impact on the historic environment by providing these 'locally listed' heritage assets with greater protection from unnecessary or unjustified loss.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	0	0
Historic Environment	+	0
Designated Environmental Sites	0	0
Flood Risk	0	0
Land Contamination	0	0

Policy 14 – Arundel Town Centre

8.43 The policy defines primary and secondary shopping frontages to manage the mix of shops and other uses in the town centre.

8.44 As such, whilst it will have important economic and social benefits for Arundel, there are no environmental impacts of the policy.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	0	0
Historic Environment	0	0
Designated Environmental Sites	0	0
Flood Risk	0	0
Land Contamination	0	0

Policy 15 Business Uses

8.45 The policy supports the development of new business premises in the built up area boundary.

8.46 Its primary benefit will be economic but in confining development to the built up area boundary and to areas outside Flood Zone 3, the policy avoids any negative environmental impact.

Neighbourhood Plan SEA Objective	Policy	No Policy
Local Distinctiveness	0	0
Historic Environment	0	0
Designated Environmental Sites	0	0
Flood Risk	0	0
Land Contamination	0	0

Assessment Conclusion

8.47 The policy options chosen in the Neighbourhood Plan have been assessed as those where genuine, plausible options were available and that achieved an appropriate balance between avoiding a significant environmental impact and meeting the strategic objectives of the Plan.

8.48 The Neighbourhood Plan has made a number of important changes to the previous version of the Plan to reduce environmental impact. It has especially withdrawn proposals for a series of housing allocations in the flood plain, in the National Park or on precious open space and has reformulated

its support for major transport and car parking projects in the parish. And it has added a policy protecting important open spaces in Arundel.

8.49 In only one case is the location of proposed development outside (but adjoining) the built up area boundary and in the National Park. But the replacement site now proposed – Castle Stables – has significant beneficial environmental impact by bringing back into use a cluster of important heritage assets that may otherwise lay vacant for many years now their commercial use is no longer viable. The buildings and land are suited in principle to a conversion to residential use and will enable the provision of a valued source of privately and affordable rented accommodation in the town.

8.50 The other sites are intended to resolve longstanding environmental issues as a result of their dereliction and/or land contamination problems or their harm to local amenity value.

8.51 Importantly, the Neighbourhood Plan is seeking to avoid any incursions by new development into the landscape and setting of Arundel. There are green field sites in these locations that are easier to deliver than the previously used land identified in the Plan. Its strong support for resolving the more difficult sites in the plan period, whilst meeting its housing supply target, will achieve a positive environmental impact.

8.52 In doing so, the Neighbourhood Plan, and the Site Assessments Report in its evidence base, is explicit about the way in which the primacy of targeting development in this way has shaped its application of the sequential and exception tests in managing flood risk.

8.53 In all other cases, there are no measureable environmental impacts, for which there is existing data or will be future data to make a meaningful assessment. Where options have allowed for a choice in proposals, where relative impact may be judged, then in each case, the option chosen has sought to minimise impact within the constraints of other policy objectives.

9. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the Neighbourhood Plan

9.1 The assessment indicates that every policy, with the exception of Policy 5, has either a positive or neutral environmental impact.

9.2 In the case of the Policy 5 proposal to redevelop a site in Flood Zone 3a, an initial development appraisal has indicated the comprehensive redevelopment of the two parts of the site will enable flood risk to be resolved satisfactorily through the layout and design of the scheme. The details of the scheme will be subject to a Flood Risk Assessment being approved by the Environment Agency.

10. An outline of the reasons for selecting the alternatives dealt with

10.1 With all the policies, where there were reasonable alternatives to compare, the conclusions reached was that the preferred options now proposed in the Neighbourhood Plan were those that would avoid any significant environmental impact when considered alongside its strategic objectives.

10.2 In practice, the Neighbourhood Plan proposes only a few site allocations or site-specific policies that are capable of assessment. In respect of the site allocations, they are determined by the criteria of Policy 3, which itself has been assessed as delivering a greater environmental benefit than its reasonable alternative. By definition, therefore, the sites identified in Policy 4 and Policy 5 are the only sites that can be allocated or supported and must be capable of mitigating any significant environmental effect.

11. A description of measures envisaged concerning monitoring

11.1 The Neighbourhood Plan proposes that the progress in its implementation will be assessed using the measures identified for each of its strategic objectives. These will be reported in the Arun and South Downs National Park Annual Monitoring Reports. Similarly, its progress in respect of its SEA objectives may be assessed and reported in the same way.