



**Strategic  
Environmental  
Assessment (SEA)  
of the Selsey  
Neighbourhood  
Development Plan**

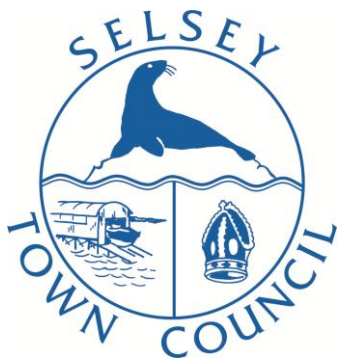
Environmental Report  
Update

March 2015

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Ireland



Prepared for:



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1	March 2015	Environmental Report published for consultation alongside the Submitted Plan	Anthony Whitaker Assistant Consultant  Maria Paez Assistant Consultant	Mark Fessey Principal Consultant	Steve Smith Technical Director

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URS Infrastructure and Environment UK Limited  
 6-8 Greencoat Place  
 London, SW1P 1PL  
 Telephone: +44(0)20 7798 5000  
 Fax: +44(0)20 7798 5001

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## INTRODUCTION

## 1 BACKGROUND

- 1.1.1 URS is commissioned to undertake Strategic Environmental Assessment (SEA) in support of the emerging Selsey Neighbourhood Development Plan (NDP).
- 1.1.2 **The NDP** is being drawn up using the powers in the Localism Act 2011. The NDP is being prepared by Selsey Town Council, which has been designated as a Neighbourhood Area by Chichester District Council. The NDP, once adopted, will present planning policy and guidance for the neighbourhood area. Alongside the Chichester New Local Plan 2014 - 2029 (once adopted) it will provide a framework for determining planning applications.
- 1.1.3 **SEA** is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse environmental effects and maximising the positives. SEA of the NDP is a legal requirement.<sup>1</sup>

## 2 SEA EXPLAINED

- 2.1.1 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the European SEA Directive.<sup>2</sup>
- 2.1.2 In-line with the Regulations, a report (**the ‘Environmental Report’**) must be published for consultation alongside the draft plan that presents information on the likely significant effects of implementing the plan and reasonable alternatives, as well as certain other specified information.<sup>3</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.

## 3 THIS ENVIRONMENTAL REPORT UPDATE

- 3.1.1 The Environmental Report was published for consultation alongside the draft (Pre-submission) NDP in 2014. Subsequently, the Town Council finalised the draft NDP for submission to the Chichester District Council (Regulation 15 of the Neighbourhood Planning Regulations). The Council must now publicise the draft NDP (Regulation 16) so that final representations can be made prior to submission of the draft NDP for Examination (Regulation 17).
- 3.1.2 This Environmental Report Update has been prepared for publication (Regulation 16) alongside the draft NDP. The aim is essentially to inform representations that will be considered at Examination.

<sup>1</sup> SEA is not an automatic requirement for NDPs. Rather, SEA is a requirement where an initial ‘screening’ assessment identifies the potential for the NDP to result in significant environmental effects. A screening opinion was provided by Chichester District Council which indicated that SEA is necessary for the Selsey NDP.

<sup>2</sup> Directive 2001/42/EC

<sup>3</sup> Schedule 2 of the Regulations lists the information that must be presented in the Environmental Report.

### 3.2 Structure of this report

3.2.1 As discussed above, the Environmental Report must present certain specified information. With a view to presenting that information (see **Table 3.1** overleaf), the 2014 Environmental Report was structured so as to answer four questions in turn -

1. What's the scope of the SEA?
  - i.e. what are the parameters of the assessment?
2. What has plan-making / SEA involved up to this point?
  - Preparation of the draft plan must have been informed by at least one earlier plan-making / SEA iteration. 'Reasonable alternatives' must have been assessed.
3. What are the SEA findings at this stage?
  - i.e. in relation to the draft plan.
4. What happens next (including monitoring)?

3.2.2 This Environmental Report Update is structured in precisely the same way, with a 'part' of the report dedicated to answering each of the four questions.

### 3.3 What 'updates' are reflected in this report?

3.3.1 In comparison to the 2014 Environmental Report -

- Part 1 (What's the scope of the SEA?) has been edited down, simply for reasons of brevity and in the knowledge that readers interested in additional detail can still access the 2014 Environmental Report.
- Part 2 (What has plan-making / SEA involved up to this point?) presents virtually the same information regarding 'reasonable alternatives'. There has been some minor editing, but alternatives assessment findings are unchanged. The final section within Part 2, which gives the Town Council's 'Outline reasons for developing the preferred approach in-light of alternatives assessment' has been updated, reflecting the fact that the preferred approach / draft plan has evolved slightly since 2014.
- Part 3 (What are the SEA findings at this stage?) has been updated so that the assessment relates to the latest version of the draft plan, and also reflects latest understanding of the evidence-base.
- Part 4 (What happens next?) has been updated, simply to reflect the fact that we are now further along the plan-making / SEA process than was the case when the Environmental Report was prepared in 2014.

Table 1.1: Questions answered by the Environmental Report, in-line with Regulatory<sup>4</sup> requirements

ENV REPORT QUESTION		IN LINE WITH SCHEDULE II THE REPORT MUST INCLUDE...
<b>What's the scope of the SEA?</b>	What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>The relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What are the key issues & objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>What has plan-making / SEA involved up to this point?</b>		<ul style="list-style-type: none"> <li>Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with <b>alternatives</b></li> <li>Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> assessment / a description of how environmental objectives and considerations are reflected in the draft plan.</li> </ul>
<b>What are the SEA findings at this current stage?</b>		<ul style="list-style-type: none"> <li>The likely significant effects associated with the <b>draft plan</b></li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the <b>draft plan</b></li> </ul>
<b>What happens next?</b>		<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

N.B. The right-hand column of Table 1.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

<sup>4</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## **PART 1:**

### **WHAT'S THE SCOPE OF THE SEA?**



## 4 INTRODUCTION (TO PART 1)

4.1.1 This Part of the Report aims to introduce the reader to the scope of the SEA. In particular, and as required by the Regulations, this Chapter answers the series of questions below.

- What's the plan seeking to achieve?
- What's the 'context'?
- What's the 'baseline'?
- What are the key issues and objectives that should be a focus of SEA?

4.1.2 **Chapter 5** answers the first question by listing the objectives of the NDP. The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following nine sustainability 'topics':

- |   |  |
|---|--|
| • Biodiversity                                      | • Heritage   |
| • Climate change mitigation (non-transport related) | • Land and other natural resources                             |
| • Community and wellbeing (including air quality)   | • Landscape / townscape  |
| • Economy and employment                            | • Sustainable transport  |
|   | • Water, flood risk and other climate change adaptation issues |

4.1.3 The nine sustainability topics were identified in-light of: 1) The 'issues' suggested by the SEA Regulations;<sup>5</sup> 2) the list of objectives used by Chichester District Council as part of Sustainability Appraisal (SA) work for their New Local Plan 2014-2029;<sup>6</sup> and 3) an understanding of the Selsey NDP objectives (i.e. an understanding of the 'plan scope').

4.1.4 Rather than focusing strictly on the environment, **the topics cover all three 'pillars' of sustainable development**, i.e. the environmental, social and economic pillars. This is deemed appropriate given that sustainable development is a stated objective for Neighbourhood Development Plans.<sup>7</sup>

4.1.5 Extending the scope of an SEA in this way does not mean that environmental issues are less likely to achieve prominence in plan-making. Extending the scope of SEA to give equal prominence to issues across the three pillars of sustainable development is the approach taken for Local Plans. For Local Plans the process is referred to as Sustainability Appraisal (SA).

## 4.2 Consultation on the scope

4.2.1 The Regulations require that *"When deciding on the scope and level of detail of the information that must be included in the Environmental Report, the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.<sup>8</sup> As such, these authorities were consulted on the SEA scope in March 2014.

<sup>5</sup> Schedule 2 suggests a focus on 'issues such as' biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, and landscape. All of these issues are reflected clearly in the list of topics, with the exception of 'soil'. 'Soil' is not assigned a standalone topic on the basis that the NDP area does not include agricultural land.

<sup>6</sup> See [http://www.chichester.gov.uk/utilities/action/act\\_download.cfm?mediaid=20515](http://www.chichester.gov.uk/utilities/action/act_download.cfm?mediaid=20515) (accessed 03/14). **Appendix 2** of this report lists the Chichester SA objectives in full.

<sup>7</sup> At Examination all NDPs must demonstrate that they meet the 'basic condition' of contributing to sustainable development.

<sup>8</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

## 5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The Environmental Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.

5.1.1 As discussed above, **the NDP** is being drawn up using the powers in the Localism Act 2011. The NDP, once adopted, will present planning policy and guidance for the neighbourhood area. Alongside the Chichester New Local Plan 2014 - 2029 (once adopted) it will provide a framework for determining planning applications.

5.1.2 The draft plan does not list plan objectives explicitly; however, early chapters of the draft plan establish a vision for Selsey in 2029, and then discuss a range of broad issues that will need to be addressed in order to achieve the vision. Broad issues are –

- Environment and countryside
- Climate
- Energy
- Infrastructure
  - Youth facilities; Road safety and footpaths; Leisure facilities, libraries and parking; and Access to the A27 and congestion on the A27.
- Transport
  - B2145; Public transport; Commuting cycle routes; and Signage of roads, paths and cycle routes.
- Economy
  - Employment; and Protecting sites suited to providing employment.
- Society
  - Population; Welfare; Housing needs; Traveller and Gypsy housing needs; Future housing provision; Household waste; Community safety (police, ambulance, fire and wardens); Education and healthcare services

### 5.2 What's the plan not seeking to achieve?

5.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the development management process). The strategic nature of the plan is reflected in the scope of the SEA.

## 6 WHAT'S THE 'CONTEXT'?

The Environmental Report must include...

- The relevant sustainability objectives, established at international / national level; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

### 6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate scope of an SEA involves reviewing context messages in relation to: broad problems / issues; and objectives, i.e. 'things that are aimed at or sought'. Messages from the review are presented below under the topic headings introduced above. Specific consideration is given to international and national context messages, in-line with requirements.<sup>9</sup> National context messages are established first and foremost by the National Planning Policy Framework (NPPF),<sup>10</sup> but there is also a need to 'cast the net wider'. It is also appropriate to give explicit consideration to the emerging Chichester Local Plan.<sup>11</sup>

**N.B.** This Context Review section has been edited down since that published within the 2014 Environmental Report. Specifically, context review messages seeking to 'supplement the NPPF' have been removed, for brevity.

### 6.2 Biodiversity

6.2.1 In May 1992 European Union governments adopted legislation designed to protect the most seriously threatened habitats and species across Europe. This legislation is called the Habitats Directive and complements the Birds Directive adopted in 1979. At the heart of both these Directives is the creation of a network of protected sites. The Birds Directive requires the establishment of Special Protection Areas (SPAs) for birds, whilst the Habitats Directive requires Special Areas of Conservation (SACs) to be designated for other species, and for habitats. Also, wetland sites of international importance are designated under the Ramsar Convention. Together, SPAs, SACs and Ramsar sites make up what is known as the Natura 2000 network of protected sites. All EU Member States contribute to maintaining the 'favourable conservation status' of the network.

6.2.2 Also, international context is set by the EU Sustainable Development Strategy (2006), which included an objective to halt the loss of biodiversity by 2010. More recently at the European level, a new EU Biodiversity Strategy<sup>12</sup> was adopted in May 2011 in order to deliver on the established Europe-wide target to halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020.

6.2.3 Key messages from the National Planning Policy Framework (NPPF) include -

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Protect internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.

<sup>9</sup> Schedule II(e)

<sup>10</sup> DCLG (2012) National Planning Policy Framework [online] available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

<sup>11</sup> Chichester District Council (2013) New Local Plan 2014-2029 [online] available at: <http://www.chichester.gov.uk/newlocalplan> (accessed 21/03/2014)

<sup>12</sup> European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: [http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1\\_EN\\_ACT\\_part1\\_v7%5b1%5d.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5b1%5d.pdf) (accessed 04/13)

- Promote the ‘preservation, restoration and recreation of priority habitats, ecological networks’ and the ‘protection and recovery of priority species’. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Account for the long-term effects of climate change. Adopt proactive strategies to adaptation and manage risks through measures including multifunctional green infrastructure (giving consideration to ‘ecological networks’).
- Encourage the effective use of land’ through the reuse of land which has been previously developed, ‘provided that this is not of high environmental value’. Set out an approach to housing density to reflect local circumstances.

6.2.4 The following are key messages from the emerging Chichester Local Plan:

- The coastal and harbour areas are important for biodiversity, recreation and tourism. Landscape and biodiversity are key environmental assets which will be protected and/or where appropriate provision will be made for improvements to biodiversity areas and green infrastructure to provide adequate open space, sport and recreation facilities.
- Designated open space and areas of biodiversity form key components of a green infrastructure network. An inter-connected network of green spaces is essential to retaining existing biodiversity and enhancing areas by providing important links and corridors for species, helping to protect against habitat fragmentation and allowing species migration.
- Coastal features such as vegetated shingle at Selsey are identified as key strategic green infrastructure assets of biodiversity, landscape and recreational value in the District.

### 6.3 Climate change mitigation

N.B. Issues relating to ‘sustainable transport’ (i.e. reducing car dependency and encouraging walking, cycling and use of public transport) are considered under a stand-alone topic below).

6.3.1 Key messages from the National Planning Policy Framework (NPPF) include -

- Support the transition to a low carbon future in a changing climate as a ‘core planning principle’.
- There is a key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008<sup>13</sup>. Specifically, planning policy should support the move to a low carbon future through:
  - planning for new development in locations and ways which reduce GHG emissions;
  - actively supporting energy efficiency improvements to existing buildings;
  - setting local requirements for building’s sustainability in a way that is consistent with the Government’s zero carbon buildings policy;
  - positively promoting renewable energy technologies; and
  - encouraging those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.

6.3.2 The following are key messages from the emerging Chichester Local Plan:

- New buildings will need to meet stringent standards of energy and water efficiency and the use of renewable energy. Where possible, encourage the adaptation of older buildings.
- Reduce waste, increase recycling, support the recovery of value and energy from waste, and protect water quality within the plan area.

<sup>13</sup> The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.

## 6.4 Community and wellbeing

6.4.1 Key messages from the National Planning Policy Framework (NPPF) include -

- The social role of planning involves ‘supporting vibrant and healthy communities’ and a core planning principle is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’.
- Facilitate social interaction and creating healthy, inclusive communities’.
- Promote retention and development of community services / facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set strategic policy to deliver the provision of health facilities.
- Choice of school places is of high importance and there is a need for a proactive approach.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- Promote competitive town centres that reflect the local ‘individuality’.
- Ensure that developments create safe environments without crime and fear of crime.
- Plans should contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas.
  - The Air Quality Strategy sets health-based objectives for nine main air pollutants.<sup>14</sup>
  - Also of note is the EU Thematic Strategy on Air Pollution, which aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year).
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- Avoid noise from giving rise to significant adverse impacts on health and quality of life.
- To ‘boost significantly the supply of housing’, local planning authorities should meet the ‘full, objectively assessed need for market and affordable housing’ in their area.
- With a view to creating ‘sustainable, inclusive and mixed communities’ authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- Good design is a key aspect in sustainable development. Design should reinforce local distinctiveness and address the connections between people and places.
- Larger developments are sometimes the best means of achieving a supply of new homes.

6.4.2 The emerging Local Plan also identifies specific objectives in terms of Health and Well-Being to encourage healthy and active lifestyles, provide opportunities to residents to enjoy local assets and environment; and improve accessibility to health and well-being services. Policy 52 states that developments should demonstrate that will contribute the health and well-being of the local and wider community; whilst the Infrastructure Delivery Plan highlights that Selsey may need capital investment in community healthcare and primary care.<sup>15</sup>

6.4.3 It is also recognised that traffic congestion issues in the District have a detrimental impact on air quality. Air quality assessments may be required to accompany planning applications to assess the cumulative impact on local air quality.

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<sup>14</sup> Defra (2007) Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at: <http://www.defra.gov.uk/environment/quality/air/air-quality/approach/> (accessed 04/13)

<sup>15</sup> Chichester District - Infrastructure Delivery Plan (2014-2029) [Online] Available at: <http://www.chichester.gov.uk/cil> (accessed 24/03/2014)

## 6.5 Economy and employment

6.5.1 Key messages from the National Planning Policy Framework (NPPF) include -

- The planning system can make a contribution to building a strong, responsive economy by ‘ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure’.
- Capitalise on ‘inherent strengths’, and meet the ‘twin challenges of global competition and of a low carbon future’.
- Support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’.
- Support competitive town centre environments, including where there are active markets. Edge of town developments should only be considered where they have good access and there will not be detrimental impact to town centre viability in the long term.

6.5.2 Key messages from the emerging Chichester Local Plan include:

- Selsey is a popular town for holiday destination with one of the largest caravan parks in Europe. During the holiday season, the population of the town is more than doubled. It is also a focus for horticulture, fishing and other marine businesses.
- The relatively self-contained coastal settlements of Selsey and East Wittering will thrive as centres for commercial activities that meet the needs of residents, businesses and visitors. This will include the revitalisation of Selsey town centre and seafront and the village centre of East Wittering, in order to enhance their role as tourist resorts. The local visitor economy will develop niche markets including green tourism, reflecting the area’s natural assets and shift from a day trip destination to one which encourages short stay breaks. In particular, places such as the Medmerry Realignment and Pagham Harbour will serve to extend the tourism season.
- Selsey is a strategic development location. Retail developments will be supported to promote vitality and viability of Selsey.

## 6.6 Heritage

6.6.1 Key messages from the National Planning Policy Framework (NPPF) include -

- Deliver conservation and enhancement of the historic environment, including landscape.
- Set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.
- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character.
- Look for opportunities within Conservation Areas, and within the settings of heritage assets, to enhance or better reveal their significance.

6.6.2 The emerging Chichester Local Plan seeks to maintain an attractive environment through protecting the landscape and heritage assets which will encourage tourism and inward investment from businesses. Incorporate high standards of urban design and architecture that respects the character of the landscape, heritage, adjacent and nearby settlements and built development, reflecting the urban to rural transition with appropriate boundary treatment. Tourism is an important economic sector and is dependent on quality of the cultural heritage, natural and historic environment and facilities on offer. It is necessary to balance provision of visitor facilities against the need to safeguard landscape and the wider environment.

## 6.7 Land and other natural resources

- 6.7.1 The EU's Thematic Strategy on the Prevention and Recycling of Waste is long-term strategy which aims to ensure that Europe becomes a recycling society that seeks to avoid waste and which uses waste as a resource.<sup>16</sup>
- 6.7.2 EU's Soil Thematic Strategy<sup>17</sup> presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.
- 6.7.3 In-line with the mandatory requirements of the Waste Framework Directive, the Waste Management Plan for England contains information including analysis of:<sup>18</sup>
- The current waste management situation and the measures to be taken to improve environmentally sound preparing for re-use, recycling, recovery and disposal of waste.
  - Existing waste collection schemes and major disposal and recovery installations and an assessment of the need for new collection schemes, the closure of existing waste installations, and additional waste installation infrastructure.
  - Planned waste management technologies and methods, with specific consideration given to: measures to promote high quality recycling including the setting up of separate collections of waste to meet the necessary quality standards for the relevant recycling sectors; and measures to encourage the separate collection of bio-waste.
- 6.7.4 Key messages from the National Planning Policy Framework (NPPF) include -
- Protect and enhance soils, taking into account the value of best and most versatile agricultural land.
  - Prevent new or existing development from being adversely affected by the presence of unacceptable levels of soil pollution or land instability and be willing to remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land.
  - Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- 6.7.5 With regards to waste, the NPPF does not contain any specific waste policies as Planning Policy Statement 10: Planning for Sustainable Waste Management<sup>19</sup> remains in force. The overall objective of PPS10 is to reduce the production of waste and use it as a resource.
- 6.7.6 The Resource Management Strategy for West Sussex (2005-2035) provides an action plan, focused on waste prevention, waste reuse, recycling, composting, and end treatment and final disposal. The West Sussex Waste Local Plan endorses a zero-waste-to-landfill county. The intention is that no new landfill sites will be allocated, subject to robust evidence being available to support this approach.<sup>20</sup>
- 6.7.7 The emerging Chichester Local Plan states that Horticultural Development Areas (HDAs) and proposals for new development including packhouses and polytunnels, will consider that soil, water, air noise and light pollution levels are minimised and mitigated.

<sup>16</sup> EC (2011) Thematic Strategy on the Prevention and Recycling of Waste [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0013:FIN:EN:PDF> (accessed 20/03/14)

<sup>17</sup> EC (2006) Soil Thematic Policy [online] available at: [http://ec.europa.eu/environment/soil/index\\_en.htm](http://ec.europa.eu/environment/soil/index_en.htm) (accessed 20/03/14)

<sup>18</sup> Defra (2013) Waste Management Plan for England [online] available at: <https://www.gov.uk/government/publications/waste-management-plan-for-england> (accessed 03/14)

<sup>19</sup> Planning Policy Statement 10: Planning for Sustainable Waste (2011) [online] available at: <http://www.communitites.gov.uk/documents/planningandbuilding/pdf/1876202.pdf> (accessed 20/03/14)

<sup>20</sup> West Sussex County Council, [http://www.westsussex.gov.uk/your\\_council/strategies\\_policies\\_and\\_publications/minerals\\_and\\_waste\\_policy/waste\\_local\\_plan.aspx](http://www.westsussex.gov.uk/your_council/strategies_policies_and_publications/minerals_and_waste_policy/waste_local_plan.aspx) (accessed 20/03/14)

## 6.8 Landscape / townscape

- 6.8.1 The European Landscape Convention (ELC) came into force in the UK in March 2007. The ELC defines landscape as: “An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.” It recognises that the quality of all landscapes matters – not just those designated as ‘best’ or ‘most valued’. Among other things, the ELC commits all signatories to establishing and implementing policies aimed at landscape protection, management and planning / integrating landscape into town planning, cultural, environmental, agricultural, social and economic policies.
- 6.8.2 Key messages from the National Planning Policy Framework (NPPF) include -
- Set strategic policy to deliver conservation and enhancement of the natural and historic environment, including landscape.
  - Protect and enhance valued landscapes. Give weight to conserving scenic beauty.
- 6.8.3 The emerging Chichester Local Plan sets out the following considerations:
- The distinctive character, quality and importance of the historic environment (including archaeology), local landscapes, wildlife and habitats, will be conserved and enhanced whilst accommodating the development needs of the community.
  - Landscape character and environmental designations reduce the opportunities for new housing and mean that development needs to be planned very carefully to preserve and enhance the character and environment of the area.
  - Many buildings in the District are listed or are of listable quality or contribute to local distinctiveness as non-designated heritage assets; many may form part of important farmstead groups or contribute to landscape and/or settlement character.
  - Local distinctiveness in the built environment is founded on the understanding of the characteristics and influences of the locality particularly its landscape quality and corresponding use of materials.
- 6.8.4 Proposals will need to respect and enhance the landscape character of the surrounding area and site, public amenity and detailed design. Some key strategic green infrastructure assets of biodiversity, landscape and recreational value in the District, include but are not limited to: Coastal features such as vegetated shingle at Selsey and West Wittering.

## 6.9 Sustainable transport

- 6.9.1 Key messages from the National Planning Policy Framework (NPPF) include -
- Minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.
  - The transport system needs to be balanced in favour of sustainable transport modes (including walking, cycling and public transport), giving people a choice about travel.
  - Planning for transport and travel will have an important role in ‘contributing to wider sustainability and health objectives’.



- 6.9.2 The West Sussex Transport Strategy<sup>21</sup> and the emerging Chichester Local Plan seek to combat congestion issues in Chichester and the Manhood Peninsula and promote effective long term measures to manage and reduce car traffic in the district. Key issues are as follows:
- There is a high demand for travel in Chichester and many factors contribute to the transport problems. Chichester city and the Manhood Peninsula suffer from road congestion, especially at peak times.
  - Ensuring accessibility to services and determining the best pattern of transport provision are amongst the most challenging spatial issues which the Council and the other service providers need to address.
  - The Local Plan and Infrastructure Delivery Plan will assist the District Council and the County Council in identifying road transport infrastructure requirements and how they can be delivered, i.e. through developer contributions and other funding sources.
  - There is a need to implement behaviour change measures to reduce the use of the private car (Smarter Choices).

## 6.10 Water, flood risk and other climate change adaptation issues

- 6.10.1 The Water Framework Directive (2000/60/EC) drives a catchment-based approach to water management. The EA is currently seeking to establish 'Significant Water Management Issues' within catchments with a view to presenting second River Basin Management Plans to ministers in 2015. The Plans will seek to deliver the objectives of the WFD namely: Enhance and prevent further deterioration of aquatic and wetland ecosystems; Promote the sustainable use of water; Reduce the pollution of water, especially by 'priority hazardous' substances; and Ensure the progressive reduction of groundwater pollution. Also, the EU's 'Blueprint to Safeguard Europe's Water Resources' promotes use of green infrastructure such as wetlands, floodplains and buffer strips along water courses in order to reduce vulnerability to floods and droughts. It also emphasises the role efficiency can play in reducing water scarcity/stress.<sup>22</sup>
- 6.10.2 Key messages from the National Planning Policy Framework (NPPF) include -
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply and wastewater.
  - Take account of the effects of climate change in the long term, including factors such as 'flood risk, coastal change, water supply and changes to biodiversity and landscape. Planning authorities are encouraged to 'adopt proactive strategies' to adaptation and ensure new developments are planned so that they avoid vulnerability to climate change.
  - Development should be directed away from areas at highest risk from flooding, and should "not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding". Where development is necessary, it should be made safe without increasing risk elsewhere. Where new development is vulnerable this should be managed through adaptation measures.

<sup>21</sup> West Sussex County Council (2011) Local Transport Plan 2011-26 (LTP3) [online] available at: [http://www.westsussex.gov.uk/your\\_council/plans\\_projects\\_reports\\_and/plans/west\\_sussex\\_transport\\_plan/west\\_sussex\\_transport\\_plan1.aspx](http://www.westsussex.gov.uk/your_council/plans_projects_reports_and/plans/west_sussex_transport_plan/west_sussex_transport_plan1.aspx) (accessed 21/03/2014)

<sup>22</sup> European Commission (2012) A Blueprint to Safeguard Europe's Water Resources [online] available at [http://ec.europa.eu/environment/water/blueprint/pdf/COM-2012-673final\\_EN\\_ACT-cov.pdf](http://ec.europa.eu/environment/water/blueprint/pdf/COM-2012-673final_EN_ACT-cov.pdf) (accessed 04/13)

- 6.10.3 The emerging Chichester Local Plan sets out the following considerations:
- The Council is working with other public bodies and local communities to develop a coordinated approach known as Integrated Coastal Zone Management (ICZM). This process seeks to integrate the different policies that have an effect on the coast. There is a strong focus upon partnership working and informed collaboration.
  - Local proposals and initiatives will be supported that: contribute to greater safeguarding of property from flooding or erosion and/or enable the area and pattern of development to adapt to change, and take account of relevant Surface Water Management Plans, Catchment Flood Management Plans and related flood defence strategies.
  - More limited new development is proposed for the Manhood Peninsula, in recognition of the significant transport and environmental constraints (including flood risk) affecting the area. Policies for the peninsula follow the principles of Integrated Coastal Zone Management, which seeks to protect the area's sensitive environment and adapt to climate change, whilst addressing local needs and promoting regeneration.
  - Landowners and residents have an important part to play alongside the statutory agencies to ensure that communities are better prepared to deal with flood events.
- 6.10.4 The Chichester Infrastructure Delivery Plan states that:
- The Manhood Peninsula Surface Water Management Plan will be undertaken by West Sussex County Council as Lead Local Flood Authority. Contributions will be required from other funding sources, including from the community, for any future works or schemes. Failure to provide adequate flood defences could lead to extensive property damage and possible land loss within Chichester District. The Local Plan will provide the policy framework to mitigate against the adverse effects of climate change by locating new development in areas that are less prone to flooding. This will include development on the coast where a lack of adequate seas defences could lead to property damage.

## 7 WHAT'S THE SUSTAINABILITY 'BASELINE'?

The Environmental Report must include...

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan;
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

### 7.1 Introduction

7.1.1 The baseline review is about expanding on the consideration of problems/issues identified through context review so that they are locally specific.

**N.B.** This Context Review section has been edited down since that published within the 2014 Environmental Report.

### 7.2 Biodiversity

7.2.1 **Figure 7.1** shows an extract from the emerging Chichester Local Plan Key Diagram, from which it can be seen that Selsey sits between an internationally important Special Protection Area (SPA) - Pagham Harbour - to the east and the Medmerry Realignment to the west. Further to the west is another internationally important site (designated as an SPA and also forming part of the wider Solent Special Area of Conservation, SAC) – known as Chichester and Langstone Harbours. Further information on these two internationally important sites can be found within the Habitat Regulations Assessment (HRA) Report that accompanies the Selsey Neighbourhood Plan. **Box 7.1** provides some further background information in relation to Pagham Harbour.

7.2.2 The Medmerry Realignment is an area of managed coastal retreat, where the sea wall has been deliberately breached in order to enable development of inter-tidal habitat. The biodiversity value of the site will develop over time as intertidal habitats establish, but the site is already afforded the same level of protection as the internationally designated sites on the basis that it was created to provide compensatory habitat for future effects on the Solent SAC as a result of coastal defence work.

7.2.3 The SSSI shown in **Figure 7.2** stretching along the coastline to the west of Selsey is Bracklesham Bay, whilst the small SSSI adjoining Selsey to the south-east Selsey East Beach. Bracklesham Bay was designated primarily on account of the grazing marsh habitats found on the landward side of the sea wall, although the presence of important intertidal habitats and geological features also contributed to its designation. The nature of this SSSI has now changed on account of the sea wall realignment. Selsey East Beach is designated for its geological interest, with the citation stating that "*The site at Selsey East Beach should be seen in conjunction with Selsey West Beach (to be included within the Bracklesham Bay SSSI). Together they form a key Quaternary site for a sequence of freshwater and estuarine deposits of Ipswichian Interglacial age*". The geological formations are likely to become less visible over time on account of sea level rise<sup>23</sup>.

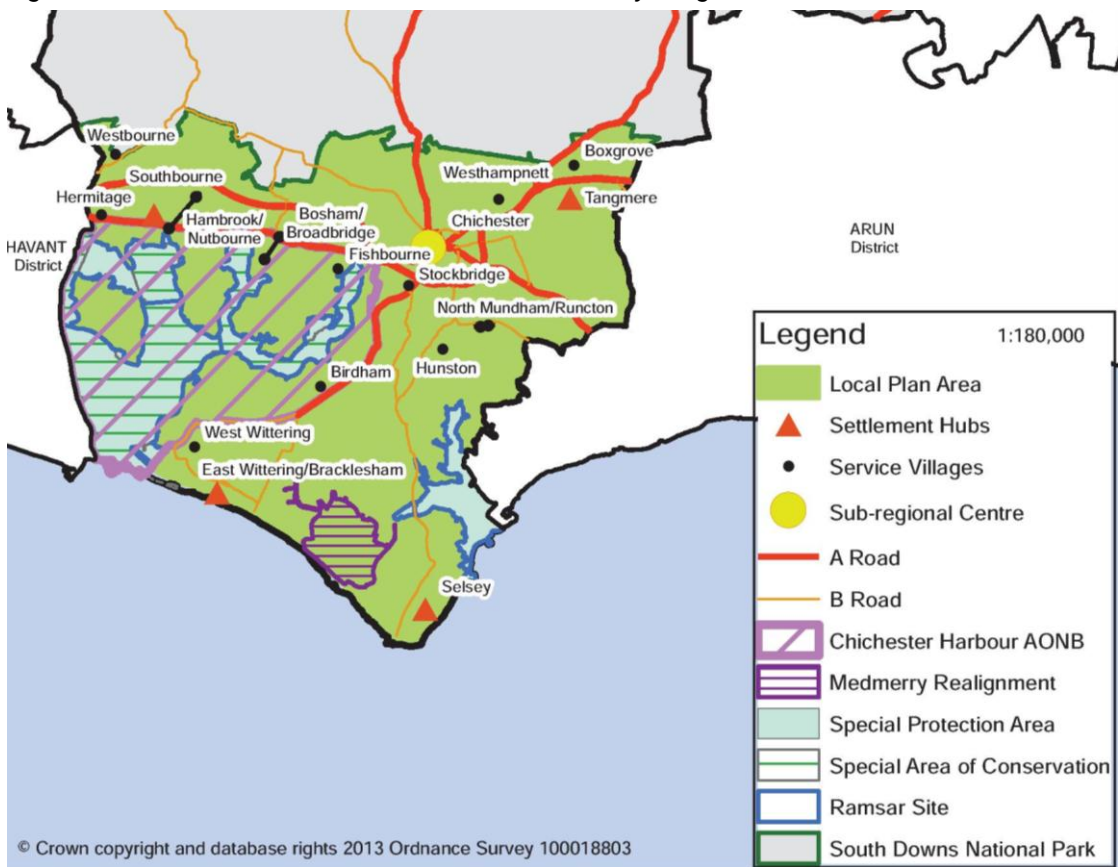
7.2.4 **Figure 7.3** shows the location of Local Nature Reserves and locally designated Sites of Nature Conservation Interest (SNCl). It can be seen that Pagham Harbour is managed as a nature reserve (by the RSPB). The feature to note is Crablans Farm Meadows Site of Nature Conservation Importance (SNCl), located on Selsey's western edge. This is a low-lying area of wet neutral grassland is important for wintering and migrant birds, as well as flora.

<sup>23</sup> Natural England: SSSI unit information [on line] available at: [http://www.sssi.naturalengland.org.uk/special/sssi/unit\\_details.cfm?situnt\\_id=1008408](http://www.sssi.naturalengland.org.uk/special/sssi/unit_details.cfm?situnt_id=1008408) (accessed 19/03/2014)

7.2.5

Finally, it is important to give consideration to the **maritime biodiversity** interest locally. The marine area known as ‘Selsey Bill and the Hounds’ has been put forward as a candidate Marine Conservation Zone, but the designation process is currently on hold. Defra has indicated that although there is enough evidence to support designation for the peat and clay habitat, additional evidence is required to support designation of the site for five additional habitats and features recommended by stakeholders. If designated, this site would protect one of the most important examples of peat and clay exposures in the region, in the form of the unique Mixon Hole off Selsey Bill, which supports a rich range of flora and fauna. The site also encloses The Hounds, an unusual limestone and clay reef, which is joins the Mixon Hole on the list of 24 key marine ‘Sites of Nature Conservation Importance’ in Sussex.<sup>24</sup>

Figure 7.1: Extract from the Chichester Local Plan Key Diagram

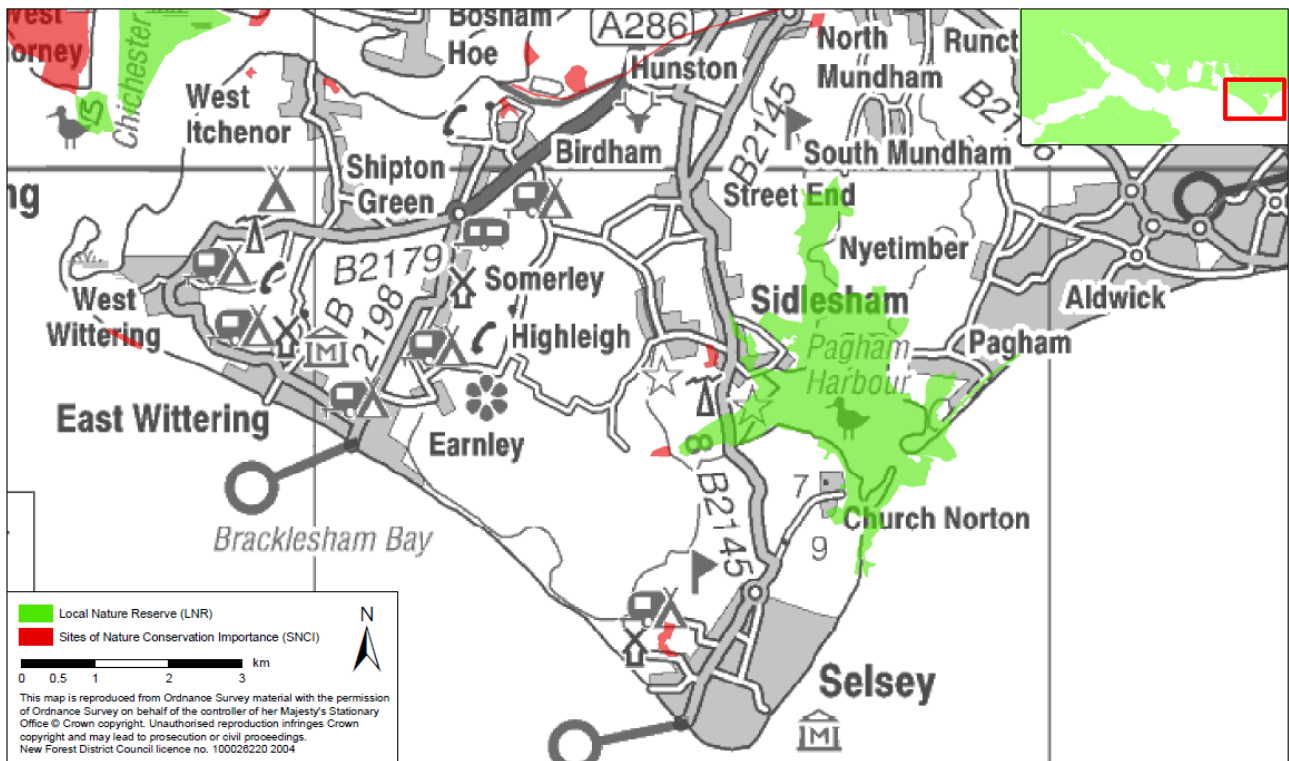


<sup>24</sup> The Wildlife Trusts (website) <http://www.wildlifetrusts.org/MCZ/selsey-bill-and-the-hounds> (accessed 19/03/2014)

Figure 7.2: Nationally important SSSIs<sup>25</sup>



Figure 7.3: Local Nature Reserves and locally important SNCIs



<sup>25</sup> North Solent Shoreline Management Plan [online] available at: <http://www.northsolentsmp.co.uk/> (accessed 19/03/2014)

*Box 7.1: Pagham Harbour SPA and Ramsar*

Pagham Harbour comprises an extensive central area of saltmarsh and tidal mudflats, with surrounding habitats including lagoons, shingle, open water, reed swamp and wet permanent grassland. The intertidal mudflats are rich in invertebrates and algae and provide important feeding areas for birds. Most of the site is managed as a nature reserve by the Royal Society for the Protection of Birds. This site qualifies under Articles 4.1 and 4.2 of the Birds Directive (79/409/EEC) by supporting populations of European importance. Pagham Harbour Ramsar site qualifies under one of the nine Ramsar criteria. It is important to note that this area also includes the Medmerry Realignment Scheme which was created in order to provide compensatory habitat for future effects on the Solent European sites as a result of coastal defence work.

The key environmental conditions that support the features of European interest have been defined as:

- Sufficient space between the European site and development to allow for managed retreat of intertidal habitats (to avoid coastal squeeze)
- Maintenance of appropriate hydrological regime
- Unpolluted water
- Absence of nutrient enrichment of water
- Absence of non-native species
- Absence of disturbance

The site is being managed as a nature reserve, and historical land drainage for agricultural purposes is being addressed through the Local Nature Reserve Management Plan and Management Agreements, while pollution from inadequate treatment of sewage discharges is reviewed by the Environmental Agency. Studies by the Environment Agency indicate that existing sewage discharges are not having a significant adverse effect on the integrity of the Pagham Harbour SPA/Ramsar site. The latest Natural England condition assessment of Pagham Harbour SSSI indicated that 93% of the site was in favourable condition.

**Future baseline**

7.2.6 The Selsey area is affected by erosion and key areas of biological or geological importance have already been destroyed or damaged. Climate change is likely to continue to affect designated sites through the 'coastal squeeze' effect, being trapped between an advancing sea and fixed land defences. Levels of recreational activity, both on shore and at sea, will also have a negative effect on some habitats and species. Cumulative development pressure at Selsey and at Bognor Regis could affect the integrity of Pagham Harbour.

**7.3 Climate change mitigation**

7.3.1 In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change<sup>26</sup> suggests that Chichester has had consistently higher per capita emissions than regionally and nationally since 2005. The district has however seen greater reductions in emissions per capita between 2005 and 2011 (1.5 t CO<sub>2</sub>) compared to West Sussex (1.5 t CO<sub>2</sub>), the South East (1.7 t CO<sub>2</sub>) and England (1.8 t CO<sub>2</sub>, a 17% reduction).

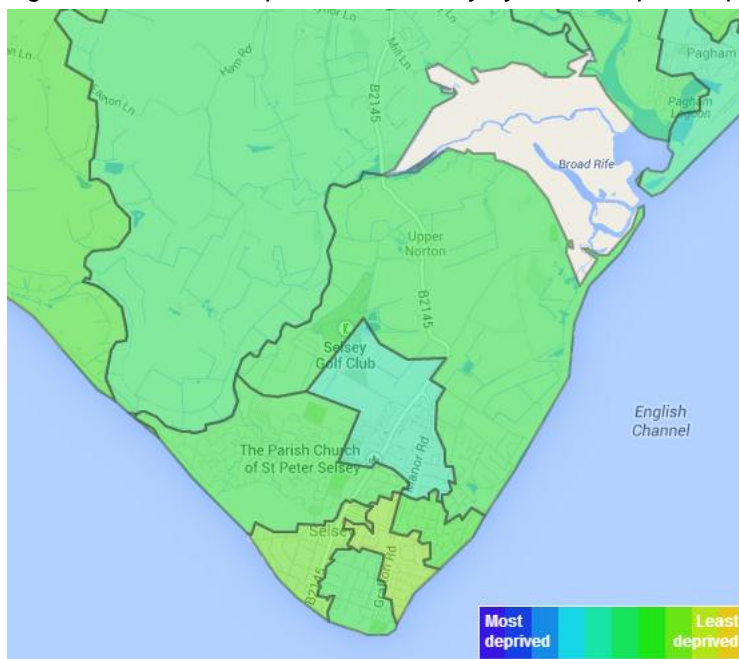
7.3.2 In relation to CO<sub>2</sub> emissions by end user, between 2005 and 2011, emissions originating from industrial and commercial and domestic sources in the Chichester have been reduced (0.5 t CO<sub>2</sub>). Road transport is the largest contributor to carbon dioxide emissions in the district and has reduced the least (0.5 t CO<sub>2</sub>) since 2005. This suggests that reducing emissions from road transport will continue to be a significant challenge in the district.

<sup>26</sup> Department of Energy and Climate Change (2011) Official statistics: Local Authority carbon dioxide emissions [online] available at: <https://www.gov.uk/government/publications/local-authority-emissions-estimates> (accessed on 05/03/2014)

**7.4 Community and wellbeing**

- 7.4.1 According to the most recent census data available, in 2011 the total population of Selsey was 10,737<sup>27</sup>. This was an increase of 862 people since the 2001 census.
- 7.4.2 Selsey generally has a lower proportion of ages between 0-60 than national and regional averages but has a substantially higher proportion of people aged 60-90 and over. The biggest differences are in the 30-44 year olds age group where Selsey has a third less adults in this age group than the regional and national average; and the 65 to 74 year old age group where Selsey has almost twice the proportion of the South East and England averages. The median age for people living in Selsey is seven years older than Chichester's; 13 years older than the South East and 14 years older than England's. The mean age for Selsey is almost 10 years older than the national average.
- 7.4.3 In terms of ethnicity, 98.4% of the population in the plan area are classed as White British. This is a higher proportion than Chichester (97%), South East (90.7%) and England (85.5%) averages.
- 7.4.4 Figure 7.4 shows that LSOAs in Selsey are in the 3<sup>rd</sup> (40-60%) and 4<sup>th</sup> (60-80%) least deprived quintiles in England in terms of overall deprivation. Despite this, as a proportion of total households, Selsey has a higher number of households that are deprived in 1 or 2 indices of deprivation<sup>28</sup> than the Chichester, regional and national averages; as shown in Figure 7.5. The domain that Selsey performs worst in is the 'Education, skills and training' domain where some LSOAs are in the 2<sup>nd</sup> (20-40%) most deprived quintile. The Manhood Peninsula, which includes the settlement hubs of Selsey and East Wittering/Bracklesham, suffers from poor road accessibility and a relative lack of local services and employment opportunities.<sup>29</sup>

Figure 7.4: Overall Deprivation in Selsey by Lower Super Output Area (LSOA)<sup>30</sup>



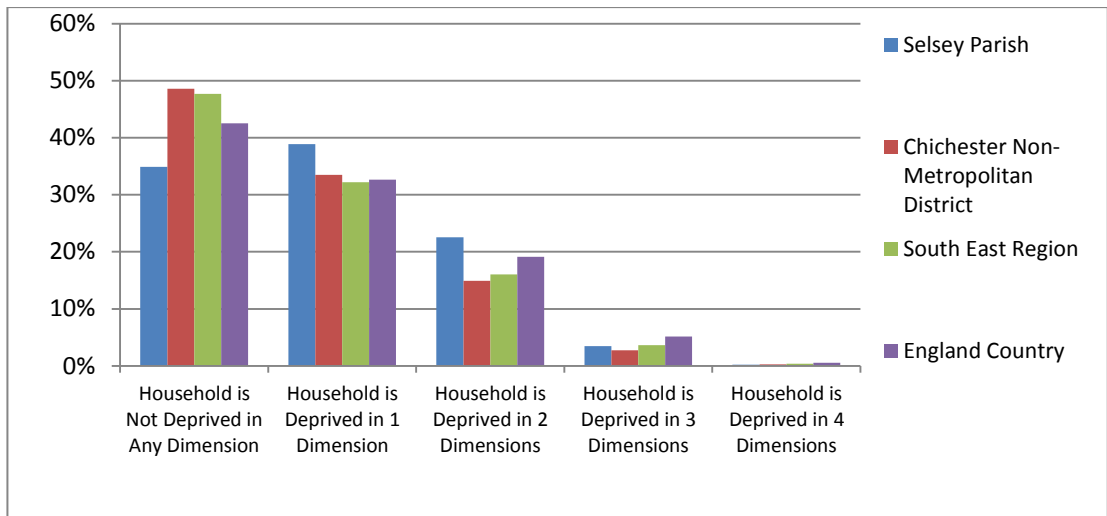
<sup>27</sup> Office for National Statistics (2011) Neighbourhood Statistics [Online] Available at: <http://www.neighbourhood.statistics.gov.uk/dissemination/LeadKeyFigures> (accessed 21/03/2014)

<sup>28</sup> There are seven indices of deprivation which are income deprivation; employment deprivation; health, deprivation and disability deprivation; education, skills and training deprivation; barriers to housing and services deprivation; crime deprivation and living environment deprivation.

<sup>29</sup> Selsey Town Council (2013) Selsey Neighbourhood Plan [online] available at: <http://www.selseytowncouncil.gov.uk/index.cfm?articleid=21862> (accessed 21/03/2014)

<sup>30</sup> Open Data Communities (2012) Deprivation Map Explorer [online] available at: <http://opendatacommunities.org/deprivation/map> (accessed 21/03/2014)

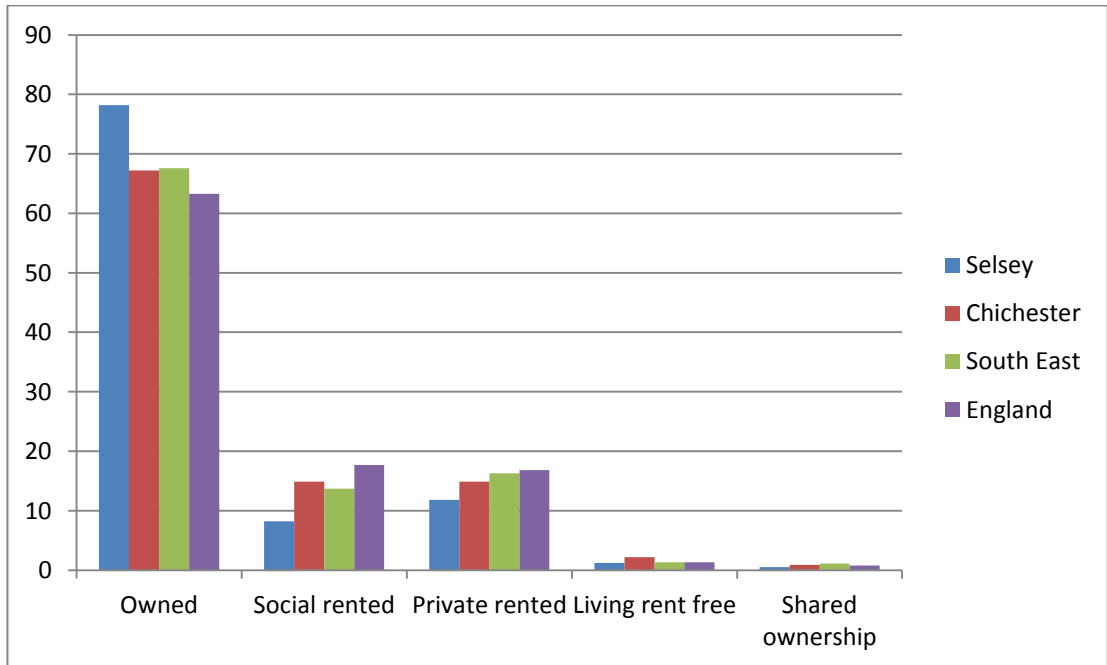
Figure 7.5: Households by Deprivation Dimensions *Error! Bookmark not defined.*



7.4.5

In January 2014 the average house price in Chichester (£351,261) was significantly higher than that for West Sussex (£217,598).<sup>31</sup> Figure 7.6 shows the tenure of households in Selsey. The plan area has a substantially higher proportion of its residents living in owner-occupied housing and a substantially lower proportion in social rented housing than all comparator areas. 8.2% of housing in Selsey is social rented in comparison to 14.9% in Chichester, 13.7% in the South East and 17.7% in England<sup>32</sup>. In May 2011, there were more than 5,000 households on the Chichester District Housing Register in need of affordable housing.<sup>33</sup>

Figure 7.6: Housing Tenure<sup>34</sup>



<sup>31</sup> Land Registry (2014) House Price Index [Online] Available at: [http://www.landregistry.gov.uk/\\_data/assets/pdf\\_file/0004/76117/HPIReport20140224.pdf](http://www.landregistry.gov.uk/_data/assets/pdf_file/0004/76117/HPIReport20140224.pdf) (accessed 21/03/2014)

<sup>32</sup> Office for National Statistics (2011) *Tenure- Households 2011* [Online] Available at: <http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView>

<sup>33</sup> Chichester District Council (2011) *Consultation Portal: Housing Numbers and Locations* [Online] Available at: [http://chichester-consult.limehouse.co.uk/portal/cs/housing\\_numbers\\_and\\_locations?pointId=s1306331205772](http://chichester-consult.limehouse.co.uk/portal/cs/housing_numbers_and_locations?pointId=s1306331205772)

<sup>34</sup> ONS (2011) Census 2011 [online] available at: [www.neighbourhood.statistics.gov.uk](http://www.neighbourhood.statistics.gov.uk) (accessed 21/03/2014)



7.4.6 No data exists for the plan area for life expectancy and health indicators; however for the district level the 2013 Health Profile shows that life expectancy in Chichester is 84.5 for women and 80.8 for men<sup>35</sup>. Both of these ages are significantly better than the national average of 82.9 for women and 78.9 for men. Overall, of the total population of Selsey, 24.5% have been classified as suffering from long-term health problems or disability<sup>36</sup>. This is considerably more than the Chichester (17.5%), South-East (15.7%) and England (17.6%) averages. It should be noted that the more elderly population in Selsey could be a significant contributing factor to this higher rate.

7.4.7 With regards to air quality, three Air Quality Management Areas exist within Chichester District; however they are all within Chichester itself and none are within Selsey.<sup>37</sup>

#### Future baseline

7.4.8 Selsey already has an elderly population which is set to grow older in the future. This may have implications for access to community resources and facilities in terms of the pressure for accessing them.

## 7.5 Economy and employment

7.5.1 Rates of economic activity in Selsey are lower than the district, regional and national averages. Rates of full-time employment are far lower in Selsey (30.8%) and Chichester (33.4%) compared to the South East (39.1%) and England (37%). However, part-time employment rates are higher in Selsey and Chichester than the South East and England. The ageing population of Selsey is evident from the retired (economically inactive) statistics of 26%, compared to 18.2% in Chichester and 13.7% in the South East and England.

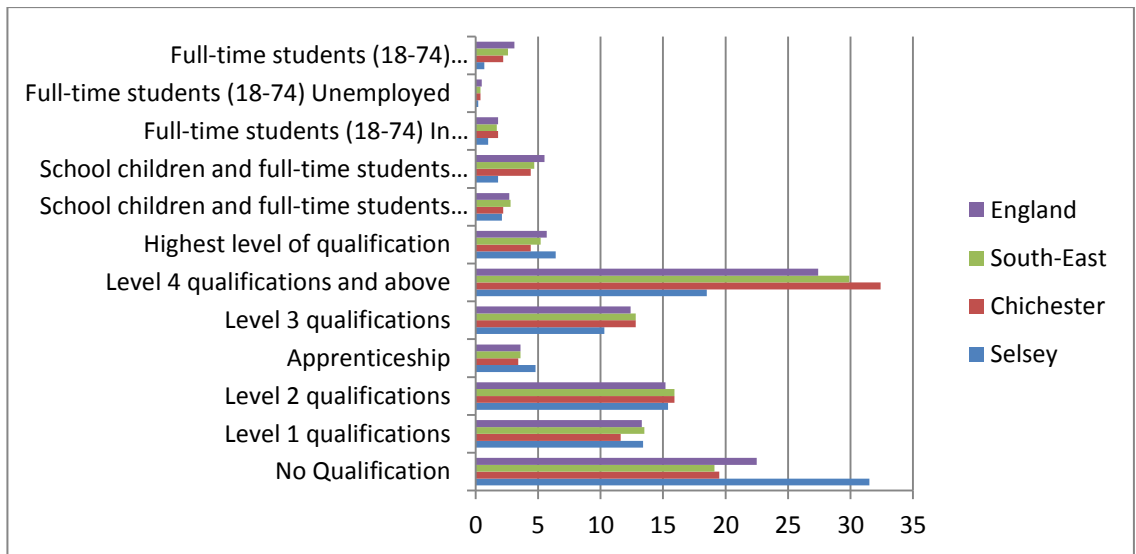
7.5.2 Figure 7.7 shows the highest level of qualification attained by residents of the plan area, in comparison with Chichester, the South East and England. The graph indicates that Selsey has a far higher proportion of residents with no qualifications in comparison to Chichester, the South East and England. Selsey also has far lower levels of residents with level 4 qualifications and above (Degree, Higher degree, NVQ 4-5, BTEC Higher level, Professional Qualifications) compared to district, regional and national averages. Selsey also has significantly fewer full-time students and school children in contrast with Chichester, the South East and England.

<sup>35</sup> Public Health England (2013) *Health Profile 2013* [Online] Available at: <http://www.apho.org.uk/resource/view.aspx?RID=50215&REGION=50158&LA=50149&SPEAR=>

<sup>36</sup> Office for National Statistics (2011) Neighbourhood Statistics: Long-term health problem or disability [Online] Available at: <http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=3&b=6505604&c=selsey&d=14&e=61&q=6473805&i=1001x1003x1032x1004&m=0&r=1&s=1395318402011&enc=1&dsFamilyId=2504>

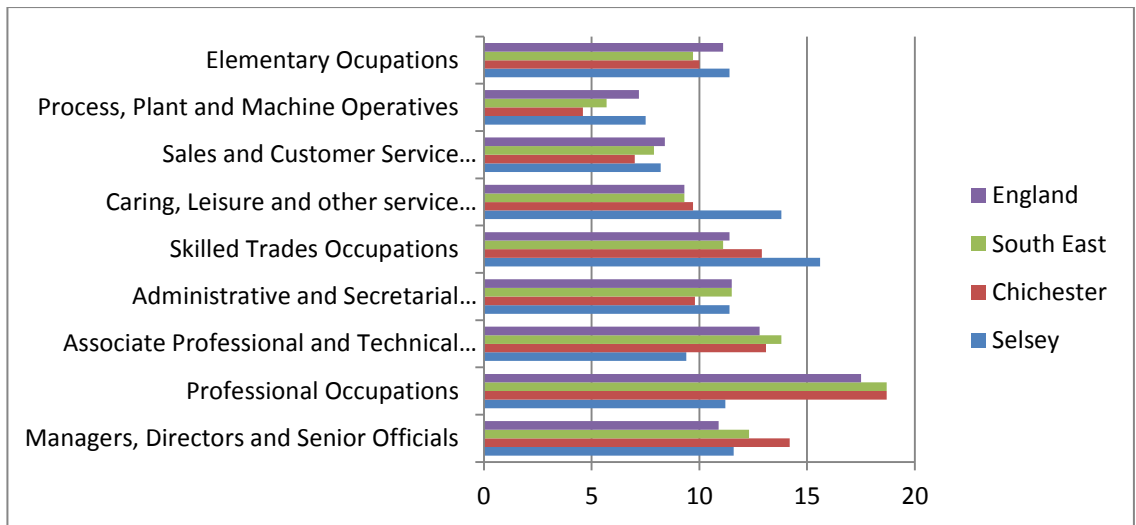
<sup>37</sup> Defra (2014) AQMAs Declared by Chichester District Council [online] available at: [http://aqma.defra.gov.uk/aqma/local\\_authorities.php?la\\_id=59](http://aqma.defra.gov.uk/aqma/local_authorities.php?la_id=59) (accessed 21/03/2014)

Figure 7.7: Qualification and students<sup>38</sup>



7.5.3 Figure 7.8 indicates Selsey has a high proportion of its residents working in skilled trade occupations, caring and leisure services occupations and elementary occupations. Accordingly, associate professional and technical occupations, and professional occupations are significantly lower in Selsey compared to the county, regional and national averages. Tourism and caring are significant sectors for the local economy.

Figure 7.8: Occupation<sup>39</sup>



Future baseline

7.5.4 Tourism is an important sector in the local economy. Without the plan, competition for tourists may result in Selsey losing its appeal, or not capitalising upon opportunities relating to green tourism at Pagham Harbour or the Medmerry Coastal Realignment scheme.

<sup>38</sup> ONS (2011) Census 2011 [online] available at: [www.neighbourhood.statistics.gov.uk](http://www.neighbourhood.statistics.gov.uk) (accessed 21/03/2014)  
<sup>39</sup> ONS (2011) Census 2011 [online] available at: [www.neighbourhood.statistics.gov.uk](http://www.neighbourhood.statistics.gov.uk) (accessed 21/03/2014)

7.6 Heritage

- 7.6.1 There are 69 Grade II Listed Buildings and 1 Scheduled Ancient Monument (SAM) in the Selsey Parish area<sup>40</sup>. The SAM is the Ringwork south of St Wilfred's Chapel. Finds from excavation work at the site showed that a castle had been built soon after the Norman invasion of 1066 and had been occupied for less than a century<sup>41</sup>.
- 7.6.2 The following are the significant features of the historic environment at Selsey:
  - Long straight High Street terminating in St Peter's Church;
  - A rich mix of 17th, 18th and 19th century buildings, many of them listed;
  - Two churches (St Peter's and the Methodist), both listed grade II.
- 7.6.3 Figure 7.9 maps out the arterial routes, listed buildings, iconic buildings and heritage trails throughout the Selsey plan area.

Figure 7.9: Iconic Buildings, Listed Buildings and Heritage Trails in Selsey Parish<sup>42</sup>



- 7.6.4 The Selsey Conservation Area which encompasses the historic High Street, with the highest concentration of listed buildings, including the parish church of St Peter's, to the north. Picturesque thatched and peg-tiled cottages, and the use of local Mixen stone, flint, and red brick give this area its special character. To the south is more mixed development, with fewer listed properties interspersed with Inter-War shops and other commercial premises. The Chichester District Council Conservation Area Appraisal for Selsey makes a number of recommendations in order to improve and enhance the Conservation Area.

<sup>40</sup> English Heritage (2014) The National Heritage List for England [online] available at: <http://list.english-heritage.org.uk/advancedsearch.aspx?refine=true> (accessed 21/03/2014)

<sup>41</sup> English Heritage (2012) List Entry: Ringwork south of St Wilfred's Chapel [online] available at: <http://list.english-heritage.org.uk/resultsingle.aspx?uid=1015982> (accessed 21/03/2014)

<sup>42</sup> Selsey Town Council (2013) Selsey Neighbourhood Plan [online] available at: <http://www.selseytowncouncil.gov.uk/index.cfm?articleid=21862> (accessed 21/03/2014)

7.7 Land and other natural resources

7.7.1 The Agricultural Land Classification classifies land into 5 Grades where Grades 1 to 3a are the 'Best and Most Versatile' land and Grades 3b to 5 are of poorer quality. Within the Selsey area, the land to the west generally of Grade 3, whilst land to the north is Grade 1 and 2. The pattern of agricultural land quality to some extent reflects the 'soilscape'.

Figure 7.10 Agricultural Land Quality

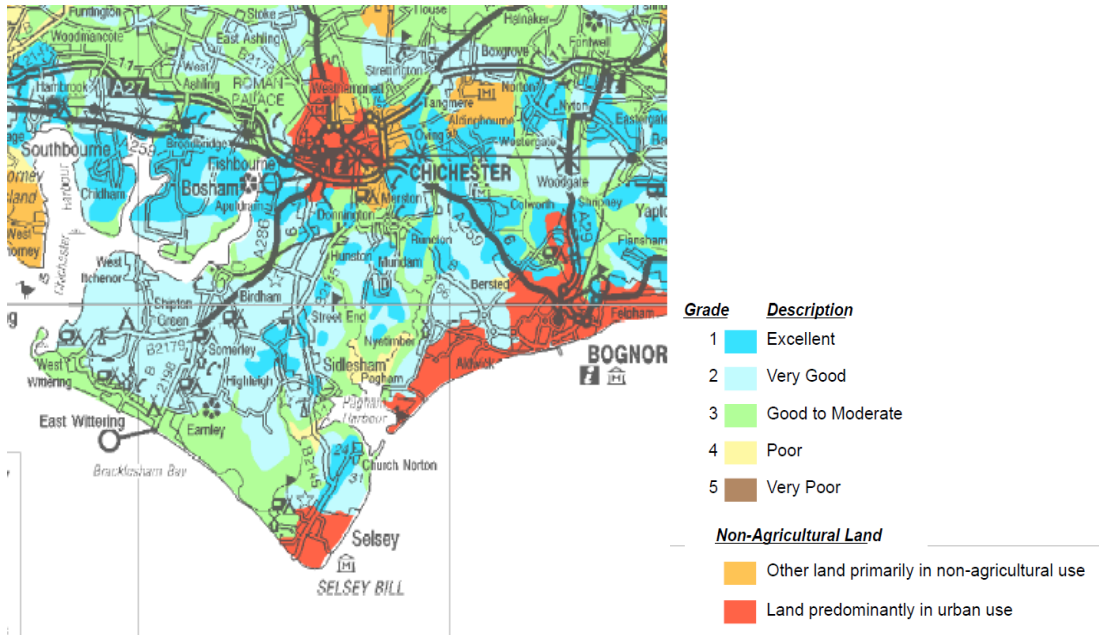
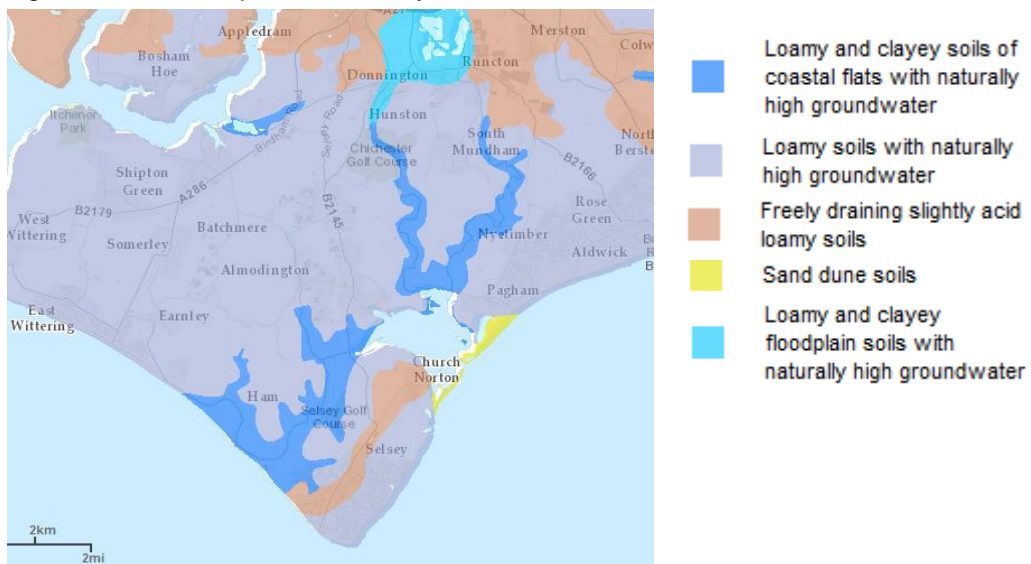


Figure 7.11: Soilscape in the Selsey area<sup>43</sup>



<sup>43</sup> Cranfield University (2014) Landis Soilscares Map [online] available at: <http://www.landis.org.uk/soilscares/#> (accessed 20/03/14)

## 7.8 Landscape / townscape

- 7.8.1 Selsey is within National Character Area 126 the South Coast Plain<sup>44</sup>. This describes the Manhood Peninsula and its southern headland of Selsey Bill as “a prominent coastal deposition feature, which projects out into the Solent well beyond the line of the rest of the coast” and “one of the last, and largest, relatively undeveloped stretches of coastline between Newhaven and Southampton”.
- 7.8.2 The Manhood Peninsula has a separate distinctive character and faces a specific set of planning challenges. Significant areas are at risk from coastal erosion and flooding, which is further accentuated by a high water table and poor land drainage. The area is heavily defended against flooding and erosion with various schemes in place, including the country’s first managed realignment on the open coast at Medmerry. The highest scores for tranquillity in the Character Area are associated with land north of Selsey<sup>45</sup>.
- 7.8.3 Statements of Environmental Opportunity (SEO) for the Character Area are to:
- Plan for and manage the effects of coastal change by allowing the operation of natural coastal processes and integrating the needs of the natural environment, landscape, local communities, agriculture, tourism and recreation.
  - Plan for the creation of a strong landscape framework within and around settlements and growth areas while managing and enhancing existing greenspace and access.
  - Manage and enhance the area’s rivers and wetland habitats to provide resilience against climate change, improve flood protection and water quality, particular in Pagham Harbour, for the benefit of the local community and wildlife.
  - Manage the rich archaeological and historic resource and geological exposures within the landscape, including association with maritime industries.
- 7.8.4 The Chichester District Council’s Open Space Assessment identifies needs in Selsey. As the table shows, Selsey needs 1) natural and semi-natural green space; 2) parks, 3) allotments, and 4) sport and recreation and play space.

Table 7.1: Open Space in Selsey<sup>46</sup>

Open Space Typology	Existing provision (ha)	Required provision (ha)	Need (ha)
Provision of amenity open space	8.49	5.56	2.93
Provision of allotments	0	3.34	-3.34
Provision of natural and semi-natural green space	245.83	11.12	234.71
Provision of parks, sport and recreation	12.27	17.79	-5.52
Provision of play space	0.30	1.67	-1.37

## 7.9 Sustainable transport

- 7.9.1 Residents of Selsey are more dependent on the car for access to employment opportunities; which is quite possibly as a result of Selsey’s peripheral location on the coast. The nearest rail station to Selsey is at Chichester which no doubt has a significant influence on the number of residents of Selsey that use the train to travel to work. However, despite having a higher reliance on the private car to travel to work; residents of Selsey have lower car ownership rates than for Chichester and the South East.

<sup>44</sup> Natural England (2014) NCA 126 South Coast Plain [online] available at:

[http://www.naturalengland.org.uk/publications/nca/south\\_coast\\_plain.aspx](http://www.naturalengland.org.uk/publications/nca/south_coast_plain.aspx) (accessed 21/03/2014)

<sup>45</sup> Natural England (2014) NCA 126 South Coast Plain [online] available at:

[http://www.naturalengland.org.uk/publications/nca/south\\_coast\\_plain.aspx](http://www.naturalengland.org.uk/publications/nca/south_coast_plain.aspx) (accessed 21/03/2014)

<sup>46</sup> Chichester District Council Open Space Strategy. Available at: <http://www.chichester.gov.uk/index.cfm?articleid=22456#futuregrowth> (accessed 19/03/14)

7.9.2 Selsey has a good quality Stagecoach Gold bus route (Route 51) that links Selsey to Chichester. It is a frequent service that supplies four buses per hour throughout the daytime Mon-Sat and 2 buses per hour on Sundays<sup>47</sup>. Selsey Town Council also operates, in conjunction with Chichester District Council and West Sussex County Council, the Selsey Shuttle community bus for people who cannot easily access bus stops on the conventional bus route or services the other end that are not along the bus route, such as St Richard’s Hospital in Chichester.<sup>48</sup>

**Future baseline**

7.9.3 There is no current allocated central Government funding for the Coastal Transport System within this spending review period (until 2015) and, at the present time, a major scheme is not actively being pursued by the local transport authorities. However, aspects of the scheme that would enhance existing services along the coastal corridor can be considered.

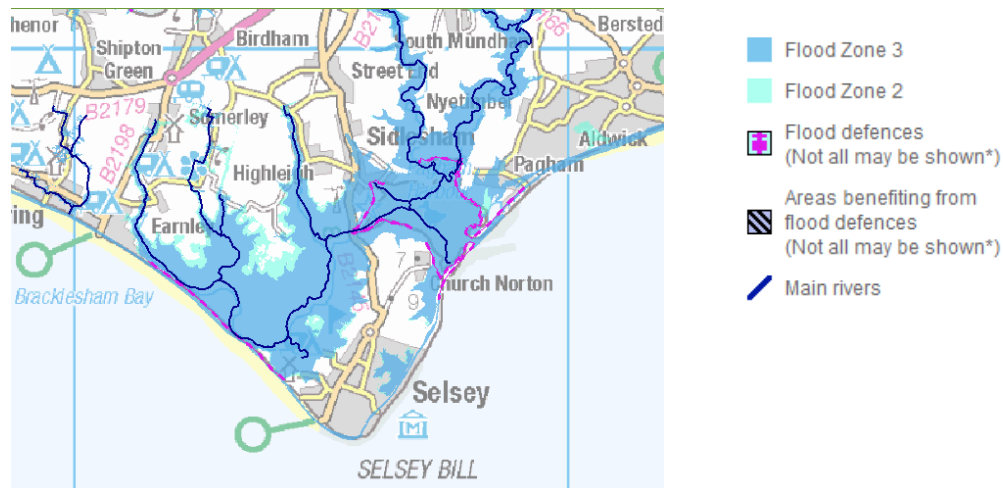
7.9.4 The County Council has published a Rights of Way Improvement Plan which sets out a strategic approach to managing public access. The overall aim is to enable the rights of way network to provide for the needs of walkers, cyclists and equestrians and those with mobility difficulties. Its objectives include improving accessibility, connectivity and quality.

7.9.5 Additional growth and housing is likely to help improve the ‘critical mass’ of demand to improve the local bus network accessing parts of Selsey not currently served (or served frequently). The emerging Chichester Local Plan and Infrastructure Delivery Plan identifies cycling schemes and a junction improvement which should help to encourage sustainable transport and combat congestion respectively.

**7.10 Water, flood risk and other climate change adaptation issues**

7.10.1 Selsey is naturally affected by flooding specially when there are high tides and stormy seas. Figure 7.12 shows two different types of area shown on the Flood Map for Planning (rivers and the sea). The blue areas are those that could be affected by flooding, either from rivers or the sea, if there were no flood defences.

Figure 7.12: Flood risk zones in Selsey<sup>49</sup>



<sup>47</sup> Stagecoach Gold (2013) Route 51 Timetable [online] available at: [http://www.stagecoachgold.com/uploads/timetable\\_33523\\_51chichester.pdf](http://www.stagecoachgold.com/uploads/timetable_33523_51chichester.pdf) (accessed 21/03/2014)

<sup>48</sup> Selsey Town Council (2014) Selsey Community Bus [online] available at: <http://www.selseytowncouncil.gov.uk/index.cfm?articleid=11344> (accessed 21/03/2014)

<sup>49</sup> Environment Agency – Flood risk website. Available at: [http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=485500.0&y=92500.0&topic=floodmap&ep=map&scale=9&location=Selsey Bill, West Sussex&lang=\\_e&layerGroups=default&distance=&textonly=off#x=484567&y=95824&lg=1,&scale=7](http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=485500.0&y=92500.0&topic=floodmap&ep=map&scale=9&location=Selsey%20Bill,%20West%20Sussex&lang=_e&layerGroups=default&distance=&textonly=off#x=484567&y=95824&lg=1,&scale=7) (accessed 21/03/14)

- 7.10.2 Much has been done to protect the Sussex coastline, particularly in the construction of flood defences. However, sea levels are rising and there have been significant coastal flood events throughout history in Sussex; most recently a storm surge in March 2008 that caused widespread flooding around Selsey<sup>50</sup>.
- 7.10.3 However, many of the defences have been built on a piecemeal basis as coastal towns have grown. Currently, the shoreline immediately west of Selsey Bill is protected only by the beach and erosion is on-going due to exposure to waves and strong tidal currents.<sup>51</sup> The management of the coastline between Pagham and East Head, has been a priority for all stakeholders alike to reduce the threat of flooding and coastal change.<sup>52</sup>
- 7.10.4 The Environment Agency has developed the Medmerry managed realignment scheme, which will improve the standard of flood protection for over 300 homes, the water treatment works and the main road into Selsey.<sup>53</sup> It involved the realignment of the coastline to a newly constructed floodwall several kilometres long and one kilometre inland. It also created over 183 ha of new intertidal habitat and over 300 ha of new terrestrial wetland. The Medmerry managed realignment scheme is one of the most significant flood management achievements on the south coast to date in terms of managing the effects of coastal change<sup>54</sup>.

#### Future baseline

- 7.10.5 The effects of climate change for the South East by 2050 for a medium emissions scenario<sup>55</sup> are likely to be as follows:
- The central estimate of increase in winter mean temperature is 2.2°C and an increase in summer mean temperature of 2.8°C; and
  - The central estimate of change in winter mean precipitation is 16% and summer mean precipitation is –19%.
- 7.10.6 The Manhood Peninsula is particularly vulnerable to the effects of climate change including rising sea levels, rising water table, and more intense precipitation. As a result, the Manhood Peninsula Partnership (MPP) has been working closely with the community to raise levels of awareness and to help produce adaptation plans<sup>56</sup>. In Selsey these include practical adaptations funded through a Community Grant Fund including the installation of cycle racks; the provision of water butts and compost bins for community gardens.

<sup>50</sup> Selsey Town Council (2013) Selsey Neighbourhood Plan [online] available at: <http://www.selseytowncouncil.gov.uk/index.cfm?articleid=21862> (accessed 21/03/2014)

<sup>51</sup> Strategic Flood Risk Assessment of West Sussex (2010) Available at: [http://www2.westsussex.gov.uk/yourcouncil/ppri/mwdf/sfra\\_vol2technical\\_jan10.pdf](http://www2.westsussex.gov.uk/yourcouncil/ppri/mwdf/sfra_vol2technical_jan10.pdf) Accessed 21/03/14

<sup>52</sup> Environment Agency (2006) Planning for the Future: Pagham to East Head Coastal Defence Strategy 2007: Initial consultation – a guide for local communities. Available at: <https://www.gov.uk/government/publications/pagham-to-east-head-coastal-defence-strategy--2> accessed 29/04/2014)

<sup>53</sup> Environment Agency (2012) Medmerry Coastal Defence Scheme. Available at: <http://www.environment-agency.gov.uk/homeandleisure/floods/109062.aspx> (20/03/14)

<sup>54</sup> Natural England (2014) NCA 126 South Coast Plain [online] available at: [http://www.naturalengland.org.uk/publications/nca/south\\_coast\\_plain.aspx](http://www.naturalengland.org.uk/publications/nca/south_coast_plain.aspx) (accessed 21/03/2014)

<sup>55</sup> UK Climate Projections (2009) South East 2050s Medium Emissions Scenario [online] available at: <http://ukclimateprojections.metoffice.gov.uk/22290> (accessed 05/03/2014)

<sup>56</sup> Manhood Peninsula Partnership website. Available at <http://peninsulapartnership.org.uk/projects/climate-change-and-adaptation/>

**8 WHAT ARE THE KEY ISSUES / OBJECTIVES THAT SHOULD BE A FOCUS OF SEA?**

8.1.1 The following table presents the sustainability objectives established through SEA scoping, i.e. in-light of context/baseline review and consultation. Objectives are grouped under the nine sustainability ‘topic’ headings. Taken together, these topics and objectives provide a methodological ‘framework’ for assessment. The objectives draw heavily on those that have been identified through scoping work undertaken by Chichester District Council as part of Sustainability Appraisal (SA) for the new Local Plan. **Appendix II** presents the full list of objectives established within the Chichester Local Plan SA Report (2013).

*Table 8.1: The SEA Framework*

Topic	Sustainability objectives established in-light of context/baseline review
Biodiversity	<ul style="list-style-type: none"> <li>• Prevent biodiversity loss and habitat fragmentation</li> <li>• Enhance biodiversity opportunities and create new habitat</li> <li>• Protect and enhance ecological integrity at Chichester / Langstone Harbours and Pagham Harbour</li> <li>• Deliver multi-functional Green Infrastructure</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>• Make efficient use of energy</li> <li>• Maximise the use of renewable and low carbon energy sources</li> <li>• Encourage sustainable design and construction</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>• Ensure access to local shopping, community, and leisure facilities and access to and enhancement of open space including children’s play space</li> <li>• Encourage the retention and development of key services and facilities</li> <li>• Improve health and reduce inequalities, including through promoting healthy living through e.g. provision of walking, cycling and recreation facilities; and securing health infrastructure</li> <li>• Increase the net supply of housing, including housing for people, particularly families, on low to moderate incomes; and affordable housing</li> <li>• Contribute to an improvement of air quality</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>• Promote access to employment opportunities for local people</li> <li>• Encourage the retention and growth of existing, locally based industries and businesses</li> <li>• Accommodate new and expanding businesses</li> <li>• Encourage investment in the local economy and promote opportunities for employment</li> <li>• Promote high-skilled economic activity</li> <li>• Enhance tourism, in particular ‘green tourism’ related to Pagham Harbour and Medmerry</li> <li>• Address skills and qualifications deficiencies, including by supporting provision of education facilities and supporting those in need of year-round (i.e. not seasonal) employment.</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>• Promote high quality urban design which protects and enhances the historic environment, and ensure enhancement of the public realm, taking into consideration the characteristics of the existing townscape and strategic views</li> <li>• Ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value including archaeological sites. Also consider the setting of assets.</li> <li>• Implement the Conservation Area Appraisal recommendations</li> </ul>
Land	<ul style="list-style-type: none"> <li>• Protect the best and most versatile land from development</li> <li>• Encourage recycling and the efficient use of resources</li> </ul>
Landscape / townscape	<ul style="list-style-type: none"> <li>• Ensure protection of traditional urban forms</li> <li>• Conserve and enhance landscape in Selsey</li> <li>• Contribute to meeting objectives of the South Coast Plain Character Area</li> </ul>
Sustainable transport	<ul style="list-style-type: none"> <li>• Reduce reliance on private transport, promote sustainable travel and enhance permeable access</li> <li>• Encourage development that enables walking, cycling and/or the use of public transport</li> <li>• Encourage provision of infrastructure for walking, cycling and/or the provision of public transport</li> </ul>
Water / flood risk / climate change adaptation	<ul style="list-style-type: none"> <li>• Protect water resources</li> <li>• Reduce the risk of coastal, fluvial surface water and groundwater flooding</li> <li>• Promote SUDS and the restoration natural function to river and coastal systems</li> <li>• Ensure that Selsey adapts to the effects of climate change</li> </ul>



**PART 2:****WHAT HAS PLAN-MAKING / SEA INVOLVED UP TO THIS POINT?**

**9 INTRODUCTION (TO PART 2)**

The Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan).

9.1.1 The ‘story’ of plan-making / SEA up to this point is told within this Part of the Environmental Report. Specifically, this Part of the Environmental Report explains how preparation of the Draft Plan has been informed by assessment of **spatial strategy alternatives**.

*What about other SEA work that has informed preparation of the Draft Plan?*

9.1.2 Whilst formal alternatives assessment has only been undertaken in relation to one headline policy area / issue (namely the spatial strategy), SEA has also fed-into plan-making in other ways besides. Specifically –

- A working draft of the plan document was subjected to assessment in summer 2014, with explicit recommendations made that were then taken on-board by the Town Council when finalising the Draft (Pre-submission) Plan for consultation; and
- The assessment of the Draft (Pre-submission) Plan, as presented within ‘Part 3’ of the 2014 Environmental Report, has been taken on-board and reflected in the current version of the plan.

9.1.3 However, this part of the Environmental Report does not attempt to explain these aspects of the plan-making / SEA story in detail. Rather: Appendix 3 lists those recommendations made in summer 2014, alongside the Town Council’s response; and Part 3 of this report also makes explicit reference to changes that have been made to the plan since the last (Pre-submission) draft version of the plan was subjected to assessment.

*Structure of this part of the Environmental Report*

9.1.4 In order to ‘tell the story’ of alternatives consideration, the following three questions are answered in turn:

- What are the reasons for selecting spatial strategy alternatives dealt with?
- What are the assessment findings in relation to the spatial strategy alternatives?
- What are the reasons for selecting the preferred approach (in-light of the assessment)?

9.1.5 These questions reflect the regulatory requirement for the Environmental Report to present 1) assessment findings for reasonable alternatives and 2) ‘an outline of the reasons for selecting the alternatives dealt with’.

**10 OUTLINE REASONS FOR SELECTING SPATIAL STRATEGY ALTERNATIVES**

**10.1 Introduction**

10.1.1 Figure 10.1 shows the four greenfield<sup>57</sup> site options in Selsey that are ‘in the mix’. Table 10.1 then identifies five alternative spatial strategies, i.e. alternative approaches to developing the site options. The aim of this chapter is to introduce the site options and the spatial strategy alternatives, with a view to demonstrating the ‘reasonableness’ of the approach taken.

Figure 10.1: The four site options



Table 10.1 Alternative spatial strategies

Spatial Strategy Option	Site options				Total
	Park Farm (Middle / Rush Field)	Drift Field	Thawscroft	Ellis Square	
Option 1	50	100	-	-	150
Option 2	100	100	-	-	200
Option 3	100	100	-	50	250
Option 4	100	100	100	-	300
Option 5	100	100	100	50	350
Option 6	150	100	100	-	350
Option 7	150	100	100	50	400
Option 8	200	100	100	-	400

<sup>57</sup> There are also brownfield and/or developed sites that may well come forward for redevelopment during the plan period; however, there is not enough certainty around the availability and/or deliverability of any of these sites to enable them to be allocated within the NDP. Rather, it is anticipated that dwellings (c.50 over the plan period) will come forward as ‘windfall’, with any planning application considered against development management policies (with parking likely to be a key consideration).

## 10.2 The site options

10.2.1 The background to the site options is as follows:

- Park Farm (Middle / Rush Field) – is an area that could potentially be used to deliver 260 homes. Landlink Estates Limited have planning permission to build 50 homes on the western part of the site, and have agreed with Selsey Town Council that a preferable scheme would involve developing the whole site for mixed use (including a quality supermarket, a hotel, soft play, pub/restaurant and dental facility) with around 90 homes. It is expected that the full mixed use scheme could be delivered between 2015 and 2020.
- Drift Field - The proponent of this scheme is Pye Homes Limited who recently submitted a planning application for 100 homes on the site which was dismissed both by the District Council and at appeal. It is expected that a further scheme will come forward (again for around 100 homes) and be delivered between 2015 and 2020.
- Thawscroft – is a site to the west of the town that is in multiple ownership and is probably not imminently deliverable. Bunn leisure are owners of the western part of the site, and have a long term plan for the land. The site, if progressed by the owners, would not be required until the latter stages of the plan period i.e. 2025 to 2029. It would not be desirable for the site to come forward before then given the need to avoid impacts associated with multiple development sites. Also, there are known to be significant flood risk issues associated with the site.
- Ellis square – This greenfield site, which is currently unused and overgrown, has been allocated for employment uses for a number of years. The Chichester Employment Land Review 2013 concludes that the access and environmental quality of the site is good, but attributes the slow development to the relatively weak commercial market locally. It recommends reducing the existing employment land allocation and allowing a greater range of uses on the remainder of the site (e.g. housing). The Town Council, however, are of the view that land currently earmarked for commercial use must be protected as such. The housing capacity of the site is about 50 units.

10.2.2 In light of the parameters set by Policy 23 of the emerging Chichester Local Plan (which states, amongst other things, that any extension to Selsey must be “well integrated with the town and provides good access to existing facilities”), and the Local Plan objectives (e.g. the desire to ensure greenfield extensions ‘nest into the current footprint of the town’), it is not felt that any other site options exist that reasonably need be considered here.

## 10.3 The spatial strategy alternatives

10.3.1 From Table 10.1, it can be seen that the alternative spatial strategies vary both in terms of the spatial approach taken (i.e. the proportion of total growth directed to each site option) and the total quantum of housing to be delivered.

10.3.2 A starting point for the identification of spatial strategy alternatives is the emerging Chichester Local Plan, which is at an advanced stage (with the proposed submission version having been published), but is yet to be adopted. The Chichester Local Plan is set to allocate **150 homes** to Selsey. The plan document states that “*This modest allocation reflects the physical, environmental and accessibility constraints affecting the town.*” This allocation is made in order to realise a defined ‘vision’ for the Manhood Peninsula – see **Box 10.1**.

10.3.3 The Town Council are of the view that allocation of land for 150 new homes over the plan period would reflect a ‘low growth’ approach. There is no (‘reasonable’) need to consider a **lower growth** strategy, as any such approach would conflict with the plan objectives around improving local infrastructure and supporting local businesses.

*Box 10.1: Chichester Local Plan (2013) - Vision for the Manhood Peninsula*

The emphasis will be mainly upon protecting and enhancing the special qualities of the coast and its rural hinterland, which attract residents, visitors and businesses to the area. The provision of new homes and workplaces will help make the area more self-contained and reduce the area's dependence on Chichester city. In recognition of the semi-rural nature of some settlements and the proximity to internationally important wildlife habitats such as Pagham Harbour and Medmerry Realignment, a selective and sensitive approach to development will be taken.

The relatively self-contained coastal settlements of Selsey and East Wittering will thrive as centres for commercial and social activities that meet the needs of local residents, businesses and visitors alike. This will include the revitalisation of Selsey town centre and seafront and the village centre of East Wittering, in order to enhance their role as tourist resorts. The local visitor economy will develop niche markets including green tourism, reflecting the area's natural assets and shift from a day trip destination to one which encourages short stay breaks. In particular, places such as the Medmerry Realignment and Pagham Harbour will serve to extend the tourism season.

A broad mix of housing will be promoted, ranging from smaller homes suitable for first-time buyers and older people to larger family-sized homes, including the provision of affordable housing. Where necessary, new development will support improvements to facilities and infrastructure.

Intrinsic local industries such as small scale horticulture, agriculture, fishing and tourism will flourish with a particular focus on food production. An 'enterprise' culture, building on high levels of entrepreneurship and self-employment, will be developed further by, for example, improving links with academic institutions in Chichester.

- 10.3.4 If the plan were to deliver 150 homes over the plan period (i.e. allocated land for 100 plus 50 homes with planning permission at Park Farm) then it would seem fairly obvious that the best approach to distributing these would involve focusing development at Park Farm (Middle / Rush Field) and Drift Field, on the town's north-eastern edge. It might be suggested that 150 homes could be targeted at Park Farm (Middle / Rush Field) only, however, this would be less preferable (on account of overdevelopment of this site) and it is also the case that pressure for development at Drift Field would likely remain.<sup>58</sup> As such, one low growth option is proposed – **Option 1**.
- 10.3.5 **Option 2** would involve 200 homes over the plan period. It would seem obvious that the best way to deliver this would involve 100 homes at Park Farm (Middle / Rush Field) in addition to the 100 homes at Drift Field. A 100 home scheme at Park Farm (Middle / Rush Field) has been shown to have the potential to bring with it considerable community benefits. This approach would be far preferable to the idea of bringing forward a small scheme at Thawscroft or Ellis Square.
- 10.3.6 **Option 3** would involve 250 homes over the plan period. On the basis that Thawscroft is a large site that lends itself to a 100 home development (rather than a 50 home development), the additional 50 homes under this option would logically be delivered at Ellis Square, i.e. through development for housing of land that is currently allocated for employment use.
- 10.3.7 **Option 4** would involve counter-balancing the approach to growth to the north of the town the Council feels to be optimal (c.200, spread across the two sites) with a 100 home development to the west of the Town at Thawscroft.
- 10.3.8 **Options 5 and 6** would involve 350 homes over the plan period. Option 5 would involve a scale of development at each of the site options that – if they were to each be considered in isolation – might be considered optimal. Option 6 would involve a more intensive development at Park Farm (Middle / Rush Field).
- 10.3.9 **Options 7 and 8** are high growth options (delivery 400 homes over the plan period). It could be suggested that even higher growth (up to 260 homes, which is the site capacity) could be considered at Park Farm (Middle / Rush Field); however, the Town Council is of the view that any development scheme involving more than 200 homes would involve over-development of this site and hence can be considered 'unreasonable' as an option.

<sup>58</sup> Indeed, the Town Council feels that development of 100 homes at Drift Field is something of a 'given', and hence this is a constant reflected across all of the spatial strategy alternatives.

## 11 ASSESSMENT FINDINGS

### 11.1 Introduction

11.1.1 The aim of this Chapter is to present assessment findings in relation to the seven alternative spatial strategies introduced above. There is also a need to explain the methodological approach taken to assessment.

### 11.2 Assessment methodology

11.2.1 For each of the options, the assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Part 1) as a methodological framework. **Red** text / shading is used to indicate significant negative effects, whilst **green** text / shading is used to indicate significant positive effects.

11.2.2 Effects are predicted taking into account the criteria presented within Regulations.<sup>59</sup> So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for 'cumulative' effects is also a consideration.

11.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the options will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.<sup>60</sup>

11.2.4 In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

<sup>59</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

<sup>60</sup> It is worth noting that, as stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>): "Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

11.3 Assessment findings

Table 11.1: Spatial strategy alternatives - assessment findings

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference							
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
<p>(1) 150 homes (50 @ Park Farm and 100 @ Drift Field)                      (2) 200 homes (100 @ Park Farm and 100 @ Drift Field)                      (3) 250 homes(100 @ Park Farm, 100 @ Drift Field and 50 @ Ellis Square )                      (4) 300 homes(100 @ Park Farm, 100 @ Drift Field and 100 @ Thawscroft)                      (5) 350 homes(100 @ Park Farm; 100 @ Drift Field, 100 @ Thawscroft and 50 @ Ellis Square)                      (6) 350 homes(150 @ Park Farm; 100 @ Drift Field and 100 @ Thawscroft)                      (7) 400 homes(150 @ Park Farm; 100 @ Drift Field, 100 @ Thawscroft and 50 @ Ellis Square)                      (8) 400 homes(200 @ Park Farm; 100 @ Drift Field and 100 @ Thawscroft)</p>									
Air quality and noise	<p>Traffic <u>congestion</u> could lead to air quality and noise issues locally, with there being the potential for impacts particularly during the busy summer season. Total growth is the primary factor differentiating the alternatives. There is no evidence to suggest that the spatial approach will have a bearing.</p> <p>There is the likelihood of higher growth options enabling the funding of transport infrastructure that might mitigate congestion to some extent (in particular, there is the potential for funds to be targeted at highways improvements at two pinch points on the outskirts of Selsey), but the potential to mitigate the effects of increased traffic will be limited (and not targeted in the town centre, which is where any air quality issues would arise).</p> <p><b>Significant effects are unlikely</b> on the basis that air quality is not currently an issue locally (i.e. there are no designated AQMAs).</p>	★ 1	2	3	4	5	5	6	6

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference							
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Biodiversity	<p>Effects to the <u>internationally important designated sites</u> are given detailed consideration within the Habitats Regulations Assessment Report that accompanies the Plan. The HRA Report focuses on the potential for effects as a result of increased recreational pressure and disturbance, as well as (to a lesser extent) the potential for effects due to the loss of 'Offsite Habitat of Value to Designated Species' (e.g. the value of large, open aspect arable fields as feeding/roosting areas for Brent Geese). The HRA Report concludes that the plan will <u>not</u> lead to significant effects, on the assumption that mitigation measures are put in place (e.g. around access management). The HRA also takes into account the potential for 'in combination' effects, stating that: "[The Selsey NP] must be considered in the context of over 18,000 new dwellings to be delivered by Chichester and Arun over the lifetime of the NP. Both the Arun Local Plan and Chichester LP have been subject to HRAs that have been able to conclude that they contain draft policies that would enable a conclusion of no likely significant effects on European sites." Growth quantum is a key consideration in the HRA Report, but consideration is also given to the distribution of development (noting that Drift Field is 350m from Pagham Harbour) and the nature of development (noting that a new hotel at Park Farm will obviously attract tourists).</p> <p>Aside from the need to take into account the potential for impacts to the integrity of the internationally important 'Natura 2000' network of designated sites, there is also a need to take into account the potential for impacts to <u>other areas of biodiversity importance</u>. Key considerations relate to the scale, location and density of greenfield development. Options 1, 2 and 3 perform relatively well on the basis that: A) there will be the potential to design in green infrastructure within the site footprint at Park Farm; and B) development at Thawscroft (which includes an area of local biodiversity importance) would be avoided. Under option 3, it is assumed that the undeveloped, overgrown land at Ellis Square has limited biodiversity value. When looking to differentiate between the merits of Options 5/6 (350 homes) and 7/8 (400 homes) a key consideration is the assumption that lower density development at Park Farm will lead to biodiversity benefits over and above avoidance of development at Ellis Square. It is predicted that Options 6, 7 and 8 (i.e. all those that involve a higher growth quantum, and relatively high density development at Park Farm) would lead to <b>significant negative effects</b> in terms of the biodiversity baseline (which is not the same as predicting significant negative effects to the Natura 2000 network).</p>	★ 1	2	3	4	5	6	7	8



Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference							
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Climate change mitigation (non-transport)	<p>It is often the case that larger scale developments lead to opportunities for ambitious and sometimes innovative approaches to the <u>incorporation of renewable or low carbon energy infrastructure</u>. However, it is not clear that this would be the case here. Option 8 would involve two sizeable development (one of 200 homes and the other of 100 homes) on adjacent land; however, it is not thought that any economies of scale would be reached that would enable renewable or low carbon energy schemes (e.g. a district heating scheme with heat provided by a gas fired combined heat and power plant or perhaps even a marine sourced heat pump).<sup>61</sup> On this basis <b>significant benefits are unlikely</b>. It is, however, assumed that a larger development at Park Farm would enable the development of homes that reach a higher '<u>Code for Sustainable Homes</u>' standard and non-residential buildings that reach a higher <u>BREAAM standard</u>. Option 1 (which would involve low growth at Park Farm) is not assumed to perform any worse than options 2 or 3 on the basis that the development management policies in the NDP will establish minimum standards that must be reached by any development.</p>	3	3	3	3	2	2	★1	★1

<sup>61</sup> The UK's largest marine sourced heat pump was recently installed at a National Trust property in Wales – see <http://www.bbc.co.uk/news/science-environment-27505207>

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference							
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Community and wellbeing	<p>There are both pros and cons to a higher growth strategy, from a community and well-being perspective. On the plus side, development will lead to funding being made available for <u>community infrastructure</u>, possibly to include a health centre (the current one being at capacity) and educational facilities. Housing growth would also go some way to attracting employers to the town, and hence enable more people to find suitable employment without having to commute out or move away. However, on balance it is likely to be the case that a higher growth strategy would worsen issues around <u>traffic congestion</u>, which has to be considered a key community and wellbeing consideration.</p> <p>More tangential considerations relate to effect that a higher growth strategy might have on the '<u>sense of community</u>' within Selsey. The town saw considerable expansion in the 20<sup>th</sup> Century, and hence it is not surprising that a widely held view is that the sense of community has declined. However, there are indicators (e.g. around the age structure of the population, and the prevalence of out-commuting) that would suggest that the strength of community could decline further over time without intervention in the form of housing growth. It may be the case that another wave of house building during the NDP plan period does mean that a critical threshold is reached that puts Selsey on course to a sustainable future.</p> <p>The distribution of development around the town is thought to have limited implications for strategic community and wellbeing considerations. Thawscroft is significantly closer to the town centre / high street than Park Fark / Drifffield, which could mean that there is greater potential to support town centre vitality (and residents of new development will find the town centre more accessible by walking/cycling); however, <b>significant effects are unlikely.</b></p>	?	?	?	?	?	?	?	?
Economy	<p>With unemployment in Selsey running above local averages and a specific project in 2013 focused on reducing the effects of deprivation in the North ward, the Town Council is of the view that there is a need to protect and promote employment land. As such, a key consideration, when looking to differentiate between the alternatives, is the <u>retention of Ellis Square</u> as an employment allocation (as opposed to its development for housing).</p> <p>More generally higher growth should help to maintain or increase the economically active population, and in turn help to ensure that <u>employers</u> wish to locate within Selsey. It is also the case that a higher growth strategy (in excess of 100 homes) at Park Farm will secure development of supermarket that will provide at least 100 jobs, many of them part time and/or lower skilled. There is understood to be a need for such jobs within Selsey. As such, Options 6 and 8 are best performing although <b>significant benefits are unlikely</b> on the basis that reliance on out commuting for employment will remain.</p>	6	5	5	3	4	2	3	★ 1

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference							
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Heritage	Neither the total growth quantum nor the spatial strategy is likely to have a significant bearing on heritage related objectives. It is not the case, as it can be elsewhere, that there is a need for growth to support the vitality of the town's historic core.	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Housing	It is obviously the case that a higher growth strategy is beneficial in terms of the objective to ensure that housing needs within Selsey are met; including need for <u>affordable housing</u> (which is high as evidenced by the length of the waiting list). There is also an identified need to change the <u>housing mix</u> , and specifically to increase the proportion of 'middle bracket' homes (e.g. homes for young families). The lack of such housing is identified as a key reason why economically active people might chose to move away from the town. A larger scheme at Park Farm (in excess of 100 homes) is likely to enable delivery of a more desirable housing mix, and hence it is predicted that Options 6, 7 and 8 would lead to significant positive effects.	8	7	6	5	4	3	2	1
Landscape/ townscape	<p>Park Farm, Drift Field and Thawscroft are all located on the <u>edge of the town</u> and hence development of any of these sites would lead to some landscape impacts. However, none of the sites are thought to be particularly sensitive, with Thawscroft perhaps being the least sensitive of the three. With regards to Park Farm and Drift Field, it is the case that the lane to the north will provide a firm boundary, and hence there can be some confidence that there will not be further encroachment into the countryside beyond.</p> <p>Another important consideration relates to the proposed development of a hotel at Park Farm, which has the potential to act as something of a <u>land-mark building</u> at the northern 'gateway' to the town. It is thought that this hotel would only come forward as part of a larger scheme (in excess of 100 homes). On this basis, Options 6, 7 and 8 perform well. Option 1 also performs well on the basis that a low growth approach at Park Farm would leave space for green infrastructure / landscaping (and Thawscroft would remain undeveloped). <b>Significant effects are unlikely</b>, although it is accepted that there is a degree of uncertainty around this conclusion given the lack of firm evidence of landscape sensitivity.</p>	1	2	2	2	2	1	1	1

Topic	Discussion of <u>significant effects</u> (and relative merits in more general terms)	Rank of preference							
		Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7	Opt 8
Transport	<p>There is little to suggest that the choice of growth / spatial strategy will have a notable bearing on the likelihood of residents, employees and those visiting the town choosing to use public transport or walk/cycle rather than using a private car. Thawscroft is located closer to the high street than the other site options, but it is not thought that this is a significant consideration as the whole town is fairly 'walkable'. Equally, whilst it is the case that expansion of the town to the North should facilitate use of public transport (to access Chichester) to some extent, any effect would likely be fairly negligible.</p> <p>One consideration relates to the aspiration for a commuter cycle route between Selsey and Chichester. Options have been considered, but the scheme remains 'on the drawing board' and hence it is unlikely that it could be facilitated by any particular growth strategy at the current time.</p>	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Water, flood risk and other climate change adaptation issues	<p>A key consideration relates to the fact that the Thawscroft site encroaches onto 'flood zone 3', i.e. an area of high flood risk. It is possible that once the migratory effect of the Medmerry realignment is taken into account the flood zone will be shown to not encroach as far as the Thawscroft site, but it cannot be assumed that this will be the case. Significant negative effects are predicted for those options that would involve development of the Thawscroft site. There is the potential to mitigate flood risk through sustainable drainage systems and building design; however, mitigation measures should only be relied upon as a last resort.</p> <p>N.B. A separate 'sequential test' process has been undertaken with a view to ensuring that sites are not allocated in areas of flood risk where there is the potential to achieve the plan's objectives through allocation of an alternative site.</p> <p>A secondary consideration relates to the quantum of growth directed by the NDP to the town as a whole. Selsey is obviously low lying and might be at greater risk of flooding in the long term, under a climate change / sea level rise scenario. It is not, however, possible to attribute significant negative effects to the high growth options on this basis, given that there will be the potential to invest further in sea defences, and also given that the scale of growth is not likely to have a bearing on emergency evacuation / access opportunities.</p> <p>The choice of spatial strategy option is not thought likely to result in notable bearing on other water or climate change adaption issues / objectives. The Chichester Local Plan does identify that one of the reasons why Selsey is deemed appropriate for 'strategic scale' growth (150 homes) is that there are no Waste Water Treatment constraints. It is assumed that this would still be the case if 400 homes were to be delivered, bearing in mind the potential for the NDP to act in-combination with other plans for growth in the catchment.</p>	★ 1	2	3	4	5	5	6	6

### Summary

As is often the case, the higher growth options perform well in terms of socio-economic objectives, but have drawbacks in terms of the achievement of environmental objectives. However, the picture for Selsey is not entirely black and white, in this respect.

Focusing firstly on socioeconomic considerations, a high growth strategy would help to address housing needs, secure investment in community infrastructure and also go some way towards securing employment in the town. Significant positive effects are predicted for Options 6 to 8 in terms of the Housing objective, given that these are higher growth options that would involve a relatively large development at the Park Farm site that, it is assumed, would involve delivery of a good housing mix. In terms of the Economy objective, significant positive effects are not predicted, but it is possible to conclude that Options 6 *and* 8 perform best on the basis that a supermarket would be delivered on the Park Farm site and Ellis Square would be retained as an employment location. In terms of the Community and wellbeing objective, uncertain effects are predicted. Development will bring much needed investment in community infrastructure; however, it is likely to be the case that worsened traffic congestion (a key issue) is to a large extent unavoidable.

In terms of environmental considerations, a headline conclusion is the suggestion that a higher growth strategy (under Options 6 – 8) could lead to significant negative effects in terms of the Biodiversity objective. The Manhood Peninsula is obviously important in terms of biodiversity along a broader stretch of coastline / at a sub-regional scale, and so it is suggested that loss of habitat will lead to impacts. Flood risk is the other important consideration, particularly given that a higher growth strategy might well involve development of the Thawcroft site, which is currently understood to be within a flood risk zone. In terms of Landscape, it is suggested that it is not possible to simply conclude that development will lead to negative effects, as there is the potential for high quality design to benefit the overall character of the town; however, this conclusion is uncertain. Finally, in terms of Climate change mitigation objectives it is recognised that A) high growth at Selsey will mean more people living in an isolated location where car dependency is largely unavoidable; and B) a higher growth strategy could lead to some benefits around standards of sustainable design and construction, but it is unlikely that even an approach that involves high growth at Park Farm and Drift Field (which are adjacent sites) would lead to incorporation of community scale renewable / low carbon energy infrastructure.

## 12 OUTLINE REASONS FOR SELECTING THE PREFERRED APPROACH

### 12.1 Introduction

12.1.1 The Town Council considered alternatives assessment findings (as presented above) when finalising the plan for submission. The statement presented below is the Town Council's response to the assessment / reasons for developing the preferred approach.

### 12.2 A statement prepared by the Town Council to explain 'outline reasons'

#### Overview

12.2.1 As outlined in the content of the Neighbourhood plan and as a result of feedback from the resident survey, the overriding preference for the Town Council would be to deliver its full allocation using only the brownfield sites identified within the town. However, given that these

a) Do not provide sufficient capacity to deliver the entire allocation (even if they all came forward together) and;

b) Are not guaranteed to come forward during the plan period

We must seek an alternative solution.

12.2.2 As Selsey is expected to deliver an allocation of at least 150 houses to 2029 and is scheduled to deliver these within the first 5 years of the Local Plan there is little option but to consider using greenfield sites on the existing boundaries of the town.

#### Ellis Square

12.2.3 The land at Ellis Square is currently designated for employment use and sits within an existing commercial setting. Development here would require employment land allocation elsewhere in the town, if we are to provide employment and economic opportunity for our residents. Therefore we will be simply be juggling competing requirements with the same land options if we aqueous on the lifting of the existing designation.

12.2.4 So taking these competing priorities into consideration our focus sadly has to turn to greenfield sites at the north and western flanks.

#### Park Farm

12.2.5 With existing outline permission for 50 properties, Park Farm is an obvious starting point. It also sits on the highest ground when compared to Drift Field and Thawscroft and is therefore in a lower flood risk area. The Middle Field/Rush Field extension to Park Farm occupies the second highest levels after Park Farm so again in terms of flood risk is preferable to Drift Field and Thawscroft. The outline proposals for this site also offer a housing mix, a significant contribution to the allocation and employment opportunity. It therefore follows that whilst this site is located furthest from the town centre, services, schools etc., as a single site, it offers multiple socio economic benefits.

#### Thawscroft

12.2.6 Through public consultation this site has proved very popular with residents due to its proximity to the town centre and existing infrastructure, laid as part of the adjacent development in the 1990's. However, the Environment Agency (EA) has advised against an allocation in the neighbourhood plan due to the flood risk on the site and the proximity to the new compensatory habitat being created at Medmerry. The EA acknowledge that the flood risk on this site may change during the life of this plan as the Medmerry scheme proves its value, in providing renewed flood protection to the western flank of the town, but at the point of drafting the neighbourhood plan the site poses an unacceptable risk of flooding and therefore

cannot currently be allocated for development. If, during the life of this plan, the flood risk on the site should be reassessed and a more favourable outcome agreed, it will be the responsibility of the developer to carry out all relevant assessments and prove the site is viable to the approval of the EA and Natural England as the responsible bodies for flooding and nature protection.

#### Drift Field

- 12.2.7 The site at Drift Field genuinely occupies ‘the middle ground’ metaphorically and physically. Whilst set away from the town centre amenities, it does benefit from its proximity to the retail provision at East Beach, so it is not isolated. It has land in both Flood zones 1 and 2 and its focus on housing only means it would deliver a substantial part (approx. two thirds) of the allocation but offers little else by way of community benefit.
- 12.2.8 In rejecting the application in 2013/14 the inspector made it clear that he did feel the site was suitable for some development, despite being outside of the Settlement Policy Area. He further suggested that the proposed density of 100 houses was in keeping with nearby development and if located to the north/western edge of the avoided substantial development in the part of the site sitting in flood zone 2.
- 12.2.9 With such a ruling from the planning inspectorate, the concept of development on this site is ‘sound’. Whilst no permission is currently granted, the inspector has left the door open for a resubmission by Pye Homes and it is fully expected that they will take up the opportunity in 2014/15. Therefore whilst the site has little external benefit other than delivering allocation, it would be churlish to ignore potential development on this site and move focus to a site which may provide more stark contrast in the benefits/impacts it delivers.

#### Conclusion on site preference

- 12.2.10 Given that Park Farm, an enlarged Park Farm/Rush Field, Drift Field are:
- all outside the existing Settlement Policy Area
  - all greenfield sites
  - all have a degree of flood risk
  - all have likely impacts on the environment and nearby designated (or likely to be designated) sites of interest
- there are similar arguments for and against each site option, and the decision on a preferred approach is finely balanced.
- 12.2.11 In order to deliver our allocation we will have to develop on at least one greenfield site and therefore the decision regarding preference has to be based on: the range of additional benefits delivered by each site; and any existent or expected planning permissions that may supersede the Neighbourhood plan process.
- 12.2.12 Using this rationale, a hybrid of options 1 & 2 that delivers in excess of the Local Plan target across two sites (Park Farm and Drift Field), with a mixed use scheme at Park Farm, offers the best overall option for the following reasons:
1. It more than delivers our allocation within 5 years
  2. It envelopes extant permission for 50 houses at Park Farm
  3. It uses land in order of flood risk with the lowest risk land being used first
  4. It has wider socio economic benefits
  5. It concentrates the delivery of our allocation to the north, rather than spreading the effect to the north and west (assuming Thawscroft does not happen).

## **PART 3:**

### **WHAT ARE THE SEA FINDINGS AT THIS STAGE?**



**13 INTRODUCTION (TO PART 3)**

The report must include...

- The likely significant effects associated with the draft plan approach
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach

13.1.1 This 'Part' of the Environmental Report presents SEA findings in relation to the Draft Plan, as submitted.

**14 METHODOLOGY**

14.1.1 The assessment identifies and evaluates 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability topics, objectives and issues identified through scoping (see Part 1) as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

- |   |  |
|---|--|
| • Biodiversity                                      | • Heritage   |
| • Climate change mitigation (non-transport related) | • Land and other natural resources                             |
| • Community and wellbeing (including air quality)   | • Landscape / townscape  |
| • Economy and employment                            | • Sustainable transport  |
|   | • Water, flood risk and other climate change adaptation issues |

14.1.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline.<sup>62</sup>

14.1.3 Because of the uncertainties involved there is inevitably a need to make assumptions. Assumptions are made cautiously, and explained within the text.<sup>63</sup> The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

14.1.4 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.<sup>64</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect 'characteristics' are described within the appraisal as appropriate.

**Added structure**

14.1.5 Although, under each topic heading, there is a need to focus on the effects of 'the plan as a whole', it is helpful to break-up the appraisal with the following sub-headings:

- The proposed spatial strategy
- The proposed approach to site specific policy
- The proposed approach to addressing thematic policy issues

<sup>62</sup> The implication being that it is difficult, if not impossible, to identify a 'cause-effect relationship' with any certainty.

<sup>63</sup> As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

*"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."*

<sup>64</sup> Environmental Assessment of Plans and Programmes Regulations 2004

15 BIODIVERSITY<sup>65</sup>

The sustainability objectives are to -

- Prevent biodiversity loss and habitat fragmentation
- Allow for movement of habitats with climate change
- Enhance biodiversity opportunities and create new habitat
- Protect and enhance the ecological integrity of the Chichester and Langstone Harbours and Pagham Harbour
- Deliver multi-functional Green Infrastructure

#### Spatial strategy

- 15.1.1 Due to the constrained nature of the Neighbourhood Plan area with regard to the geographical location of the town at the tip of the Manhood Peninsula, and flooding constraints across the flat coastal plain, two greenfield sites are allocated (Park Farm and Drift Field) and another (Thawscroft) is supported in principle, i.e. supported if it is the case that flood risk concerns can be overcome. It is assumed that growth can be delivered in a concentrated fashion at each of the strategic locations without significant loss of habitat, while providing new open space within the allocated area that might aid habitat connectivity (decreasing the potential of habitat fragmentation). However, some negative effects are likely to be unavoidable.

#### Site specific policy

- 15.1.2 **ASP01** and **ASP02** for the allocation of land at Park Farm and Drift Field respectively provide for on-site green space to minimise the impact of recreational disturbance at the ecologically sensitive areas of Medmerry realignment and Pagham Harbour. **ASP01** also encourages the retention of the existing hedgerow dividing the Park Farm and Rush Field sites.
- 15.1.3 **TAW01** (Temporary agricultural workers accommodation) seeks to minimise the impact of recreational disturbance on the Medmerry realignment and Pagham Harbour, while also ensuring the site is returned to original condition when the use has ceased.

#### Thematic policy

- 15.1.4 **DES01** sets design standards to be applied with respect to the planting of native species, the landscaping of an area with full height native trees and the unnecessary planting of ornamental non-naturalised species.
- 15.1.5 **INF1** (Infrastructure) seeks to encourage Community Infrastructure Levy funds to be targeted at delivering a coastal path; and similarly **INF3** (Links) supports proposals (such as those identified in the Greenlinks across the Manhood (GLaM) strategy) that provide a series of alternative, cross peninsula links that better connect Selsey with Pagham and Medmerry reserves and the west of the peninsula. Also, **INF2** (Open space) encourages the retention of named recreational open spaces, which may have some biodiversity value.

#### The plan as a whole

- 15.1.6 The expansion of the settlement boundary to accommodate the growth of Selsey will result in a loss of open countryside and hence will have some impact on biodiversity. Site specific policy does seek to mitigate effects to some extent, but net biodiversity gains seem unlikely. Area-wide policy does not include a major focus on biodiversity, but the effect of the plan will be to enhance the ability of residents and visitors to access, enjoy and 'connect with' the high quality natural environment surrounding Selsey. On balance, **effects are uncertain**.

<sup>65</sup> N.B. A separate process of Habitats Regulations Assessment gives consideration to impacts to Pagham Harbour and Medmerry realignment.

**16 CLIMATE CHANGE MITIGATION (NON-TRANSPORT RELATED)**

The sustainability objectives are to -

- Make efficient use of energy
- Maximise the use of renewable and low carbon energy sources
- Encourage sustainable design and construction

**Spatial strategy**

16.1.1 The Draft Plan recognises that due to its geography and micro-climate, Selsey is well placed to benefit from various forms of renewable energy. The town should be able to take advantage of the wind, solar exposure, ground & air source heat recovery and tidal power on both a domestic and commercial scale to deliver local renewable energy solutions. The expansion of the town into the allocated growth areas should help to ensure that Selsey gains more than 15% (the Government target for 2020) of its energy from renewable sources; however, it is not clear that opportunities are being fully realised in this respect.

**Site specific policy**

16.1.2 The site specific policies do not set carbon / renewable energy related requirements.

**Thematic policy**

16.1.3 **DES01** (Design and Heritage) encourages the maximising of solar gain on all new housing developments and extensions to existing properties, with buildings to include at least one of the following: renewable energy/water generation such as solar hot water gain, solar electric, photovoltaic, ground source heat pumps or grey water recycling. Development is to conform to code for sustainable homes level 5, increasing to level 6 by 2020.

16.1.4 **INF1** (Infrastructure) supports the reduction of energy costs for local inhabitants through a Community Green Energy Scheme.

16.1.5 Finally, it is noted that numerous important ‘climate’ and ‘energy’ concepts are discussed in detail in the plan’s introductory text, and hence are supported to some extent. However, it is not clear that support feeds through into policy to the fullest extent. A previous version of the Draft Plan discussed the Town Council’s Renewable Energy Policy within the Non Planning Objectives section of the plan document; however, that reference has been removed.

**The plan as a whole**

16.1.6 An ambitious growth strategy for the town leads to opportunities to take an ambitious approach to sustainable design and construction, and possibly the incorporation of community scale renewable / low carbon energy infrastructure. The plan is set to realise these opportunities to some extent, although there would appear to be the potential to go further. **Significant effects are unlikely.**

**17 COMMUNITY AND WELLBEING**

The sustainability objectives are to -

- Ensure access to local shopping, community, and leisure facilities and access to and enhancement of open space including children’s play space
- Encourage the retention and development of key services and facilities
- Improve health and reduce inequalities, including through promoting healthy living through e.g. provision of walking, cycling and recreation facilities; and securing health infrastructure
- Increase the net supply of housing, including housing for people, particularly families, on low to moderate incomes; and affordable housing
- Contribute to an improvement of air quality

**Spatial strategy**

17.1.1 Community infrastructure plays an important role within the town of Selsey. The isolated location of the town means a need to travel to access community and social facilities within the wider region, which imposes travel and time costs on residents of Selsey, and in the case of facilities such as emergency services poses potential health and wellbeing risks. An ambitious growth strategy will support delivery of community infrastructure in the town, although the effect may also be to worsen traffic congestion to some extent. Expansion of the town to the north should facilitate use of public transport (to access Chichester) to some extent.

**Site specific policy**

17.1.2 The site specific policies seek to ensure incorporation of green infrastructure such as provision for soft play areas or recreational green space. **ASP01** seeks to ensure delivery of community services such as a supermarket, hotel and health services as part of the Park Farm scheme. The Thawscroft scheme was set to deliver micro/small business units; however, the plan is now not able to allocate this site (because of flood risk issues).

**Thematic policy**

17.1.3 **DES01** (Design and Heritage) supports the incorporation of shared surfaces as a social and environmental design feature in new housing developments.

17.1.4 **SOC1** (Medical and Health services provision) encourages the development of new medical or health services for Selsey with regard to policies set at national and local level.

17.1.5 **SOC2** (Selsey Hall) seeks to conserve and enhance the prominent locally important Selsey Hall to provide a beneficial facility for the local community, such as a theatre or cinema.

17.1.6 **INF1** (Infrastructure) supports the retention, upgrading of a number of important community assets. Schemes listed include a soft play area, public realm enhancements, pedestrian priority projects and funding for two Youth Workers.

17.1.7 **INF2** (Open Spaces) specifically designates the sports and recreation ground, Manor Green Park, Lifeboat Green, Hillfield Road Park and Oval Field as Local Green Spaces, with a view to securing community uses.

17.1.8 **EC03** (Retail Centre policy) seeks to condense the high street into a more focussed precinct to ensure its long term viability.

**The plan as a whole**

17.1.9 The intention of the plan is to set Selsey on course for a sustainable future, whereby the community is well balanced in terms of demographics and there is good potential for working age residents to find employment within the town. There are some risks involved – e.g. traffic congestion – but on balance it is likely that the plan will result in **significant positive effects**.

**18 ECONOMY AND EMPLOYMENT**

The sustainability objectives are to -

- Promote access to employment opportunities for local people
- Encourage the retention and growth of existing, locally based industries and businesses
- Accommodate new and expanding businesses
- Encourage new investment in the local economy and promote development opportunities for employment
- Promote high-skilled economic activity
- Enhance tourism, in particular 'green tourism' related to Pagham Harbour and Medmerry
- Address skills and qualifications deficiencies, including by supporting provision of education facilities to meet needs, both for existing and new residents

#### Spatial strategy

- 18.1.1 An ambitious growth strategy should lead to opportunities to secure employment within the town, not least employment at a new supermarket that is set to be delivered as part of the Park Farm scheme. It is also the case that delivery of a new hotel should make the town more attractive as a visitor destination. However, the potential for growth to worsen traffic congestion is an important consideration.

#### Site specific policy

- 18.1.2 As discussed above, **ASP01** (Park Farm and Rush Field) requires delivery of a supermarket, hotel (with food and beverage provision) and health centre.
- 18.1.3 It is also noted that policy was set to require the Thawscroft scheme to include delivery of space for micro businesses; however, the plan is no longer able to allocate this site (because of flood risk issues).

#### Thematic policy

- 18.1.4 The Selsey Infrastructure Projects and Priorities List to be gradually introduced within the lifetime of the plan by means of section 106 funding (and the Community Infrastructure Levy) through **INF1** promotes new investment in the local economy through the addition of local visitor attractions such as a Cinema, a local heritage Museum, Solar and Stellar Observatory, Hotel, and Community Arts Centre. **INF1** will also secure improvements to Selsey town centre such as the retention of commercial premises on the high street, that are otherwise empty, to support high street viability in the long term. Other proactive measures are the provision of free high street Wi-Fi. **INF1** also looks to provide post-16 education facilities in light of a lack of current facility to increase local employment prospects, and to provide education grants to fund IT equipment for schools.
- 18.1.5 **INF3** supports proposals (such as those identified in the Greenlinks across the Manhood (GLaM) strategy) that provide a series of alternative, cross peninsula links that better connect Selsey with Pagham and Medmerry reserves and the west of the peninsula.<sup>66</sup>
- 18.1.6 **EC01** supports the protection and upgrading of existing employment and commercial sites, with employment land allocated at Ellis Square to be retained; whilst **EC02** supports applications for new employment development.
- 18.1.7 **EC03** sets out development management measures that reflect the important role of retail along Selsey High Street and the Orchard parade / East Beach Shops.

<sup>66</sup> INF3 is a new policy, and reflects an SEA recommendation (made in the 2014 Environmental Report) that more explicit consideration could be given, through policy, to opportunities around the town's ecotourism offer, with a particular focus on opportunities that arise given the town's strategic location between the sea, Pagham Harbour and the Medmerry realignment.

- 18.1.8 **EC04** supports the granting of planning permission for facilities that enhance the tourism offering of the town, the enhancement of community facilities, and the deliverance of employment opportunities in keeping with the available skillset in the town.

[The plan as a whole](#)

- 18.1.9 An ambitious growth strategy should help to enhance the economic role of the town, and ensure that it is sustainable in the long term. A targeted approach is set to be followed that includes a focus on employment land (e.g. at Ellis square), the town centre, tourism, education/skills, and jobs at a new supermarket (many of which will be lower skilled). From an economic perspective, it is unfortunate that a scheme at Thawcroft cannot be allocated through this plan. Overall, **significant positive effects** are predicted in the knowledge that with no intervention the economic role of the town could decline over time.

## 19 HERITAGE

The sustainability objectives are to -

- Promote high quality and sustainable urban design which protects and enhances the historic environment
- Ensure enhancement of the public realm and local distinctiveness, taking into consideration the characteristics of the existing townscape and strategic views
- Ensure protection and enhancement of conservation areas, listed buildings and other areas of intrinsic and historical value
- Implement the Conservation Area Appraisal recommendations

### Spatial strategy

- 19.1.1 The proposed spatial strategy will, in itself, not have a direct bearing on strategic heritage considerations.

### Site specific policy

- 19.1.2 The site specific policies do not make explicit reference to heritage issues. While there is no dominant architectural character or vernacular style to provide a reference for development at the allocated sites, planning of the two schemes will be in accordance with DES01 which sets appropriate heights, high quality urban design site layouts, paving and landscaping of native local species.

### Thematic policy

- 19.1.3 **DES01** supports the preservation of large properties on large plots against infill development opportunities. Avoidance of the subdivision of these properties will retain the character of the townscape, keeping the character of the area intact in light of the lack of conservation designations for the wider area.
- 19.1.4 **DES02** deals specifically with heritage. It seeks to ensure that full account is taken of heritage considerations where development would affect the Conservation Area, listed buildings or locally 'iconic' buildings.
- 19.1.5 **SOC2** ensures the conservation of the historic use, setting, and architectural features of Selsey hall for the benefit of the community.<sup>67</sup>
- 19.1.6 A museum is proposed under **INF1** as an additional attraction showcasing the local heritage of Selsey.

### The plan as a whole

- 19.1.7 Policies are in place to ensure that negative effects are avoided, and that a proactive approach is taken to heritage conservation. Supporting the vitality of the town centre should have positive implications for historic character, although there may be some tensions. It is also notable that efforts are made to facilitate understanding of Selsey's heritage, and the natural history of surrounding landscapes. On balance, **significant effects are unlikely**, but there is some potential for positive effects.

<sup>67</sup> DES02 is a new policy, and reflects an SEA recommendation (made in the 2014 Environmental Report) that the plan might go further in respect to historic environment policy given understanding around the 'iconic buildings' (the settings of which should be retained and enhanced where necessary).

**20 LAND AND OTHER NATURAL RESOURCES**

The sustainability objectives are to -

- Protect the best and most versatile land from development
- Encourage recycling and the efficient use of resources

**Spatial strategy**

20.1.1 The allocated greenfield sites form a natural progression to the existing footprint of the town, which is largely constrained given the location of Selsey on a headland. The new urban edge is relatively 'strong' (in the form of a lane to the north of Park Farm / Drift Field) which should mean that further encroachment into the countryside is unlikely, even in the longer term.

**Site specific policy**

20.1.2 **TAW01** (Temporary agricultural workers accommodation) seeks to ensure the site is returned to original condition when the use has ceased.

**Thematic policy**

20.1.3 **DES01** seeks to ensure efficient use of natural resources. There is a focus on renewable energy generation such as solar hot water gain, photovoltaic solar resources, ground source heat pumps. There is also a focus on water efficiency through grey water recycling. The use of permeable surfaces instead of hard standing, the planting of native landscaping and the siting of schemes to maximise solar gain are also to be encouraged where possible.

**The plan as a whole**

20.1.4 Greenfield development is largely unavoidable; however, it is the case that the plan reflects an ambitious growth strategy that results in greater loss of greenfield land. As such, **significant negative effects** are predicted.

20.1.5 Another consideration relates to waste management. It is understood that opportunities exist to facilitate delivery of a waste management facility at Selsey that would reduce reliance on facilities in Chichester and in-turn reduce the need to transport waste and encourage better management (e.g. sorting) of waste streams. The Draft Plan does not set policy, but does state that: *"It will remain a priority of the Town Council as part of this plan to continue to lobby West Sussex County Council, Chichester District Council and the contracted service provider (currently Viridor) for the provision of a permanent waste recycling site in the town. The preferred site for the development of such a facility remains around Ellis Square due to its commercial nature."*



**21 LANDSCAPE / TOWNSCAPE**

The sustainability objectives are to -

- Ensure protection of traditional urban forms
- Conserve and enhance landscape in Selsey
- Contribute to meeting objectives of the South Coast Plain Character Area
- Deliver open space and Green Infrastructure

**Spatial strategy**

21.1.1 The proposed growth strategy allocates a significant quantum of development to land to the north of the existing town centre, ensuring the retention of the traditional urban form which has constantly evolved since Selsey was a small village. Design and heritage policies are set to ensure the allocated sites fit into the existing footprint of the town’s landscape, conserving sensitive elements of the urban and natural heritage of the area, while delivering green infrastructure that is currently deficient or in need of investment in the area. On balance, it is not thought likely that the proposed spatial strategy will, in itself, lead to significant negative effects.

**Site specific policy**

21.1.2 **ASP01** and **ASP02** seek to ensure inclusion of green spaces, the retention of hedgerows where possible, and the provision of on-site green space. Policies also reflect the relative proximities of these areas of growth to the Medmerry realignment and Pagham Harbour designated sites. All sites are to provide fencing to protect the Medmerry realignment and Pagham Harbour from waste (litter etc).

**Thematic policy**

21.1.3 **DES01** sets house height at 3 storeys or less, unless exceptional design warrants otherwise. New development is encouraged to use shared surfaces, permeable paving with native planting of tree species to minimise visual and environmental impacts.

21.1.4 **INF1** seeks to ensure delivery of key town centre and coastal regeneration objectives.

21.1.5 **INF2** deals with the protection of existing sports and recreation grounds, Manor Green Park, Lifeboat Green, Hillfield Park Road and Oval Field. The sites are to be protected from non-recreational development and designated as Local green spaces.

**The plan as a whole**

21.1.6 Loss of greenfield land on the edge of the town could obviously lead to significant landscape effects; however, it is not clear that this will be the case given the understanding that exists around the relative sensitivity of the sites in question. It should also be the case that development in-line with the policies set out in the plan can lead to enhancements to townscape, and possibly also landscape. **Effects are uncertain.**

**22 SUSTAINABLE TRANSPORT**

The sustainability objectives are to -

- Reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area
- Encourage development at locations that enable walking, cycling and/or the use of public transport
- Encourage the provision of infrastructure for walking, cycling and/or the provision of public transport

**Spatial strategy**

22.1.1 The spatial strategy is not, in itself, likely to have a significant bearing on the extent to which residents make use of public transport and walk/cycle rather than relying on their car. The focus of growth to the north of the town may encourage new residents to access Chichester by bus, although it is not clear that any significant effect would be likely. The site at Thawscroft is notably closer to the town centre; however, this site will now not be allocated through the plan because of flood risk issues.

**Site specific policy**

22.1.2 Both site specific policies deal with access to the site, but otherwise do not set transport related policy.

**Thematic policy**

22.1.3 **TR1** and **TR2** recognise the constraining impact the winding, single carriageway Chichester Road has on the wellbeing of the Selsey community. These transport policies support improvements within the lifetime of the plan that include:

- Increased safety for all road users by introducing traffic calming measures;
- Increased affordable transport options such as the introduction of a commutable cycle route following the B2145 wherever possible to Chichester;
- A secondary access for emergency vehicles via an alternative route
- The retention of existing and introduction of new forms of public transport, in particular a frequent and reliable bus service and the reintroduction of a non-road based, railed shuttle such as monorail or tram that is affordable to all members of the community.

22.1.4 The delivery of much needed sustainable transport provision is duly proportionately linked to the level of growth planned for Selsey. Infrastructure is to be progressively introduced through **INF1** during the plan period by means of Section 106 and Community Infrastructure.

**The plan as a whole**

22.1.5 The town of Selsey is largely reliant on private transport as can be seen from Design Policy DES01, which makes provision for two parking spaces per dwelling. Growth of the town in accordance with the NDP will mean more residents living in this relatively isolated location; however, plan policies are in place to mitigate car dependency. There is a focus on walking and cycling links; and support for the town centre / employment, which will have some bearing on walking/cycling. **Effects are uncertain.**

**23 WATER, FLOOD RISK AND OTHER CLIMATE CHANGE ADAPTATION ISSUES**

The sustainability objectives are to -

- Protect water resources
- Reduce the risk of coastal, fluvial surface water and groundwater flooding
- Increase the use of SUDS and provide opportunities for restoring natural function to river and coastal systems
- Ensure that Selsey adapts to the effects of climate change

**Spatial strategy**

23.1.1 Flood risk, which is likely to worsen over time as a result of climate change / sea level rise, is obviously an important consideration for Selsey. It is not clear that the decision to follow an ambitious growth strategy will, in itself, lead to significant effects, and it is noted that the decision has been taken not to allocate the Thawscroft site, which is identified as at risk (at the current time, with the potential for risk to be re-evaluated).

**Site specific policy**

23.1.2 **ASP01** and **ASP02** include a focus on the incorporation of green space, which may support opportunities for sustainable drainage.

**Thematic policy**

23.1.3 All new housing developments are to be designed in line with **DES01** with a view to minimising flood risk. There is a particular focus on ensuring use of permeable surfaces.

23.1.4 The retention of open space in **INF2** along with considerations to minimise the impact of flooding when designing new housing developments under **DES01** reflects a suitably ambitious approach to climate change adaptation.

**The plan as a whole**

23.1.5 An ambitious growth strategy gives rise to a need to take a targeted approach to flood risk management in Selsey. It is apparent that Sustainable Drainage Systems (SuDS) and flood risk focused design measures are set to be implemented. **Effects are uncertain.** It is **recommended** that the plan go further by making explicit links to any wider strategies / initiatives for flood risk management along the coast-line.

**24 SEA CONCLUSIONS AT THIS CURRENT STAGE**

- 24.1.1 An ambitious growth strategy, with growth targeted at the two key development sites and change implemented in-line with the proposed development management policies, should lead to significant positive effects in terms of community/wellbeing and economy/employment related objectives. Additional benefits in terms of some socio-economic objectives would be realised were the Thawcroft site also to be allocated; however, it is recognised that the decision not to allocate is broadly appropriate (given the need to take a precautionary approach in relation to flood risk). The plan performs well in terms of most environmental objectives, although in some instances the plan might ideally 'go further'. The loss of greenfield agricultural land is obviously a concern; but it seems that the spatial strategy is such that effects will be minimised, and development management policy will similarly help. It is noted that numerous SEA recommendations made in relation to earlier drafts of the plan (most of which related to the stringency of environmental protection/enhancement policy) have been actioned and are now reflected in the Draft Plan.

## **PART 4:**

### **WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?**

## 26 INTRODUCTION (TO PART 4)

The Environmental Report must include...

- Measures envisaged concerning monitoring

26.1.1 As discussed on page 1 of this report, Regulation 16 of the Neighbourhood Planning Regulations requires that the Local Authority ‘publicises’ the Proposed Plan so that stakeholders can make representations that may then be considered at Examination. This Environmental Report is published alongside, with a view to informing representations.

26.1.2 This Part of the report explains **next steps** that will be taken as part of plan-making / SEA, in-line with the Neighbourhood Planning Regulations.

## 27 PLAN FINALISATION AND ADOPTION

27.1.1 **Regulation 17** requires that the Local Authority submits (to the person appointed to carry out the Examination) the Proposed Plan and a copy of any representations which have been made in accordance with Regulation 16. It may be appropriate for the Local Authority to also submit an updated Environmental Report, with a view to informing the Examination.

27.1.2 **Regulations 18 and 19** require that, subsequent to the Examination, the Local Authority publishes the Examiner’s Report and a Decision Statement. The Decision Statement sets out whether or not the Local Authority is prepared to ‘make’ (i.e. adopt) the plan. If the Local Authority is prepared to make the plan, then a referendum can be held. It may be appropriate for the Local Authority to also publish an updated Environmental Report, with a view to informing the Referendum.

27.1.3 **Regulation 20** states what the Local Authority must do when the plan is ‘made’ (i.e. adopted). The SEA Statement must be published alongside the adopted Plan. The SEA Statement must present:

- information on the decision (i.e. must answer the question: *What has plan-making / SEA involved up to this point?*); and
- measures decided concerning monitoring.

## 28 MONITORING

28.1.1 At the current stage – i.e. in the Environmental Report - there is a need to present ‘a description of the measures envisaged concerning monitoring’. In light of the assessment findings presented in Part 3 of this report, it is suggested that monitoring might focus on green infrastructure, and in particular its role in terms of mitigating the negative effects of growth on biodiversity and flood risk.

## APPENDIX I - REGULATORY REQUIREMENTS

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. The table below interprets Schedule 2 requirements.

<u>Schedule 2</u>	<u>Interpretation</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) 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 Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State 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 environmental characteristics of areas likely to be significantly affected	
(f) 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;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) 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	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i>
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i>
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i>

i.e. answer - What's the scope of the SA?

## APPENDIX II – THE CHICHESTER SA FRAMEWORK

Below is the SA Assessment Criteria from Chichester District Council's New Local Plan 2014-2029 SA Report<sup>68</sup>.

SA Objective	SA Assessment Criteria	Short Name
1) Protect and enhance wildlife	Does the option prevent biodiversity loss and habitat fragmentation?	1A. Biodiversity Loss
	Does the option allow for movement of habitats with climate change?	1B. Habitat migration
	Does the option enhance biodiversity opportunities and create new habitat?	1C. Habitat creation
2) Maximise efficient use of natural resources	Does the option protect water resources?	2A. Water resources
	Does the option maximise use of waste resources?	2B. Waste resources
	Does the option make efficient use of energy, make consumption more sustainable and reduce food miles?	2C. Sustainable consumption
3) Reduce pollution	Does the option reduce air pollution from industrial processes and transport?	3A. Air pollution
	Will the option assist the remediation of contaminated land?	3B. Contaminated land
	Does the option reduce levels of water pollution?	3C. Water pollution
4) Achieve zero net increase in greenhouse gas emissions	Does the option maximise the use of renewable and low carbon energy sources	4A. Low carbon energy
	Does the option reduce the need to travel?	4B. Need to travel
	Does the option minimise the embodied carbon in goods and buildings?	4C. Embodied carbon
5) Minimise flood risk for new and existing development	Does the option reduce the risk of coastal, fluvial surface water and groundwater flooding?	5A. Flood risk
	Does the option increase the use of SUDS and provide opportunities for restoring natural function to river and coastal systems?	5B. Sustainable drainage
6) Does the option ensure the district adapts to the effects of climate change	Does the option ensure the district adapts to the effects of climate change?	6. Adapt to climate change
7) Achieve a sustainable and integrated transport system	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	7A. Modal shift
	Does the option create able networks for cyclists and pedestrians?	7B. Cycling and walking
8) Conserve and enhance landscape and built heritage	Does the option encourage sustainable land management practices for landscape conservation?	8A. Landscape conservation
	Does the option ensure protection of traditional urban forms?	8B. Traditional urban forms
	Does the option ensure protection of listed buildings, conservation areas and archaeological sites?	8C. Historic environment
9) Increase availability of affordable housing	Does the option meet local housing need?	9A. Housing needs
	Does the option provide the right housing mix of size	9B. Sustainable mix

<sup>68</sup> Chichester District Council (2013) New Local Plan 2014-2029 SA Report [online] available at: [http://www.chichester.gov.uk/utilities/action/act\\_download.cfm?mediaid=20515](http://www.chichester.gov.uk/utilities/action/act_download.cfm?mediaid=20515) (accessed 21/03/2014)



SA Objective	SA Assessment Criteria	Short Name
	and tenure, allowing for the continuation of sustainable mix of people within communities?	
10) Provide access to services and facilities	Does the option improve access to services and facilities?	10. Access to facilities
11) Improve community safety	Does the option Improve community safety?	11. Community Safety
12) Promote economic development to maintain quality of life and competitiveness	Does the option deliver improved quality of life for all?	12A. Quality of life
	Does the option ensure that economic opportunities area accessible to all?	12B. Access to jobs
	Does the option ensure that value added is retained in the District?	12C. Value added
13) Develop a dynamic diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities	Does the option encourage innovation?	13A. Encourage innovation
	Does the option develop knowledge based economy locally?	13B. Knowledge based economy
14) To develop and maintain a skilled workforce to support long-term competitiveness	Does the option ensure skills are enhanced to increase access to works?	14A. Enhanced skills
	Does the option ensure a skilled workforce is available locally to allow business developments?	14B. Skilled workforce
15) Enable viability of the rural economy with enhanced diversity of employment opportunities	Does the option promote a prosperous and diverse rural economy?	15A. Rural economy
	Does the option promote sustainable tourism?	15B. Sustainable Tourism

## APPENDIX III – APPRAISAL OF THE ‘WORKING DRAFT PLAN’

As explained within the Introduction to ‘Part 2’, preparation of the Draft (Pre-submission) Plan was informed by appraisal of a working draft plan. This appraisal included several explicit recommendations, which are listed below alongside the Town Council’s response.

### Recommendations from the ‘working draft plan’ appraisal, and the Town Council’s response

Recommendation	In order to improve the performance of the plan in terms of...	The response of Selsey Town Council (STC)	In-light of the STC response, did the recommendation still stand within the 2014 Environmental Report?	2015 Update
Ensure that the Selsey Renewable Energy Policy is reflected in policy within the NDP.	Climate change mitigation	<p>The renewable energy policy is an adopted policy of the Town Council and we therefore question the need for a policy to support another policy.</p> <p>We would instead propose that the reference to the policy within the non-planning objectives set out in the NP makes greater reference to the existing policy and require developers to consider it in conjunction with the policies of the NP.</p>	No	The reference to the Renewable Energy Policy has now been removed from the list of non planning objectives.
Give more explicit consideration to opportunities around the town’s ecotourism offer, recognising the opportunities that arise given the town’s strategic location between the sea, Pagham Harbour and the Medmerry realignment.	The economy / employment	<p>The University of Chichester are currently looking at a destination management plan and tourism offering for Selsey Town Council. They will report back to the Town Coordinator with their ideas in 2014 but probably not before the Neighbourhood Plan is submitted.</p> <p>Further, the concept of a hotel forming part of a mixed use scheme at Park Farm is an initial step towards ‘readying’ Selsey to exploit the opportunity as Medmerry and Pagham grow as a combined offering.</p> <p>Finally, in late 2013, Bunn Leisure successfully applied for permission to open their park for 10 months of the year so they could make more of the off season opportunity they believe Pagham and Medmerry will offer. STC supported this application so as to enable the extension of the season and its fringe benefits to the local economy.</p>	Yes	Policy INF3 has been added, and hence this recommendation now no longer stands.
Go further in respect to historic environment policy. Given that understanding exists locally around the ‘iconic buildings’, the settings of which should be retained and enhanced where necessary.	Heritage	<p>Our design consultancy will draft policy DES02 and include it in the final NP document. Policy DES02 will focus on iconic and historic buildings and the role of the conservation area in the town. It is likely the policy will consider buffer zones, protecting views of historic or iconic buildings and avoiding unsympathetic development in the immediate vicinity of historic or iconic buildings.</p>	Yes	Policy DES02 has been added, and hence this recommendation now no longer stands.

Recommendation	In order to improve the performance of the plan in terms of...	The response of Selsey Town Council (STC)	In-light of the STC response, did the recommendation still stand within the 2014 Environmental Report?	2015 Update
<p>Waste management should be a more explicit focus of the NDP. Specifically, measures should be put in place to facilitate delivery of a waste management facility at Selsey that would reduce reliance on facilities in Chichester and in-turn reduce the need to transport waste and encourage better management (e.g. sorting) of waste streams.</p>	<p>Land and other natural resources</p>	<p>STC continues to fight this case but it is a difficult one. The District Council collect the waste and the County dispose of it using a third party contractor, currently Viridor. As such getting all parties to agree on a way forward is difficult as County and their contractor only have an agreement for the mobile collection service and contract variations seem troublesome for them. Needless to say there are cost implications too of moving to a 7 days manned site from a half day a week mobile service – even though there are cost savings to be made from landfill tax reduction.</p> <p>STC has recently made a recommendation to engage a local authority consultant with the brief of moving the debate to a conclusion in either direction. Land is available but not forthcoming from the District council. County can see the cost and environmental benefits of the scheme but have contractual issues and STC simply want a better service for residents and to stop the volume of waste going to landfill from the town.</p>	<p>No</p>	<p>No update.</p>
<p>Make explicit links between the growth of Selsey and investment in / use of the Coastal change fund, which is a key mechanism for the ongoing management of flood defence measures along the coast. The plan might also go further in respect to the flood risk mitigation role of green infrastructure.</p>	<p>Water, flood risk and other climate change adaptation issues.</p>	<p>Selsey was recipient of Pathfinder funding from the Coastal Change Fund in 2009/10. It is therefore likely that any future bid may be looked on favourably having been a vanguard of the fund. However, a key finding of the Pathfinder was the process of coastal rollback, moving development in land and allowing natural processes to prevail on the coastline. With limited opportunity to roll back and with abandonment a one way street for Selsey, it is unlikely STC would sign up to further funding if that scale of adaptation was expected.</p> <p>We are happy that the design guide element of the NP provides significant opportunity for developers to mitigate the impact of development through the use of permeable materials, grey water recycling and flood expectant design; that further policy is not required. Sadly the deminimus national code position of the NPPF means many developers are unlikely to strive to break through local house price ceilings in order to deliver eco/environmentally friendly, flood mitigating design.</p>	<p>Yes</p>	<p>This recommendation still stands</p>