

ARUNDEL NEIGHBOURHOOD PLAN REVIEW 2018 - 2031

FINAL SUSTAINABILITY APPRAISAL REPORT

Published by Arundel Town Council under the EU Directive 2001/42 on Strategic Environmental Assessment and the Environmental Assessment of Plans & Programmes Regulations 2004 to accompany the publication of the Submission Neighbourhood Plan

JULY 2019

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NON-TECHNICAL SUMMARY

1. The purpose of this report is to provide an assessment of any significant sustainability effects resulting from the policies and proposals of the Submission version of the Arundel Neighbourhood Plan Review.

2. The Sustainability Appraisal report provides an assessment of the policies of the Review in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The framework of appraisal objectives takes into account the comments made on the scoping report by the statutory consultees and further comments received as a result of a subsequent screening determination.

3. A Draft Sustainability Appraisal was consulted on alongside the Pre-Submission version of the Arundel Neighbourhood Plan Review in November – December 2018 and the comments made on both documents have been considered by the Town Council in preparing the final version of the Submission Plan and of this Final Sustainability Appraisal Report.

4. The Review has been prepared within a context of the made Arundel Neighbourhood Plan 2014 – 2029 and of strategic policy set out in the adopted Arun Local Plan and the South Downs National Park Local Plan, as framed by the National Planning Policy Framework.

5. The Review contains ten policies that together with the retained policies of the made plan will deliver the key objectives identified. They cover the most important land use planning matters in the town, by supplementing and refining the strategic policies of the Local Plan. The policies range from delivering housing growth and local infrastructure, to preserving and enhancing heritage assets and the special landscape of Arundel, maintaining the town centre as a service centre for local people and visitors and tourists, improving connectivity and promoting green infrastructure.

6. The Review supplements allocations of the made Plan and updates one of those allocations. In each of the made Plan allocations the housing capacity of the site has been counted as a commitment in the housing supply trajectories of the respective planning authorities. The Review therefore also seeks to make a positive contribution to the requirement of the new Local Plan Policy H SP1 to deliver 1,250 homes from non-strategic sites in the period to 2031. There are no additional homes planned in the National Park, but there is no requirement in its emerging Local Plan to do so.

7. The key sustainability issues of Arundel have been framed in respect of the potential for positive and adverse flood risk, climate change, population, health, economic development, heritage, landscape, biodiversity and traffic effects.

8. In general, the objectives of the Review have the potential to deliver a series of positive sustainability effects across a range of measures. There are especially strong sustainability effects in respect of meeting its local housing needs, sustaining the town centre and improving biodiversity. The potential for adverse effects should be addressed in specific policy choices and wording to ensure that potential is avoided

or successfully mitigated. However, the housing growth objectives will inevitably require the development of greenfield land on the edge of the town.

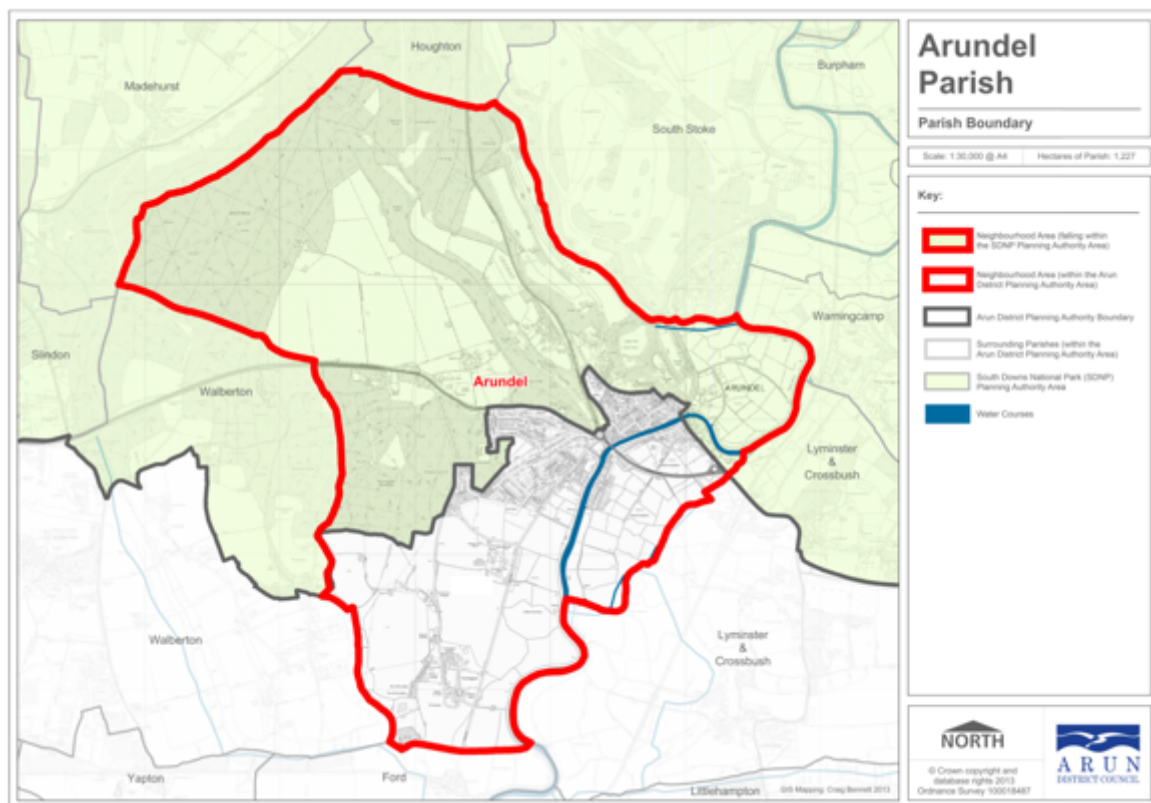
9. The Appraisal indicates that there is the potential for a number of positive and for some adverse effects, but the latter are almost entirely able to be mitigated. The nature of the former may be very significant to the future sustainability of the town, especially in terms of increasing unaffordability of the town's housing stock, delivering local infrastructure and of improving its connectivity. It also notes the potential for cumulative effects with other plans and proposals – notably the nearby Local Plan strategic allocations and the A27 Bypass project – but that the Review provisions are very small in comparison with them.

10. The appraisal is obliged to consider any reasonable alternatives to the proposed policies. In overall terms, the preferred option for housing allocations in Policies AR2 – AR4 are likely to lead to greater positive sustainability effects than the alternatives. In practice, the only alternative to all the other policies is that of having no policy and relying upon other development plan policies or national policy. The assessment considers that such an alternative would make no difference to the sustainability outcomes.

11. It can be concluded that the Submission Neighbourhood Plan Review presents a suitable strategy for achieving sustainable development when considered against its reasonable policy alternatives and does not have the potential for significant adverse effects.

1. INTRODUCTION

1.1 The purpose of this Final Sustainability Appraisal (SA) report is to provide an assessment of any significant sustainability effects resulting from the policies and proposals of the Submission version of the Arundel Neighbourhood Plan Review, in accordance with EU Directive 2001/42 on Strategic Environmental Assessment (SEA) and with the 2004 Environmental Assessment of Plans & Programmes Regulations. Plan A below shows the designated Neighbourhood Area.



Plan A: Designated Neighbourhood Area

1.2 The Neighbourhood Plan Review ("the Review") has taken the form of a partial replacement of the made Neighbourhood Plan of 2014 ("the made Plan"). It has replaced some policies of the made Plan and includes some new policies to cover the plan period to 2031. The remaining policies of the made Plan are retained for the period to 2029 unless and until replaced or deleted.

1.3 The Pre-Submission version of the Review was published for consultation by the Town Council in line with the Neighbourhood Planning Regulations 2012 (as amended). The northern part of the Parish lies within the area of the South Downs National Park Authority (SDNPA) and southern part within the Arun District Council (ADC) area. The Local Planning Authorities have an arrangement in place to deal with the designated Arundel Neighbourhood Plan Area, and ADC carries out the main administration of the project. The neighbourhood area was designated as part of the preparation of the made Neighbourhood Plan and is not proposed to be amended.

1.4 Having considered the relevant guidance and taking into account the policy content of the Plan, the Town Council informed the local planning authorities that it would be preparing a Sustainability Appraisal (incorporating a Strategic Environmental Assessment). The SA ensures that the Plan will meet the 'basic conditions' in respect of showing how the policies contribute to the achievement of sustainable development and of complying with EU law on strategic environmental assessment (i.e. EU Directive 2001/42).

1.5 The Town Council therefore proceeded straight to preparing and consulting the statutory bodies on the scope of the Appraisal (under the Environmental Assessment of Plans & Programmes Regulations 2004). A copy of the scoping report is available in the evidence base. The Draft SA report included revisions due to the comments made by the statutory bodies, notably by adding two new sustainability objectives on conserving and enhancing the landscape and important views of the South Downs National Park and protecting the supporting habitat for Bewick Swan population.

1.6 The Draft SA report was consulted on alongside the Pre-Submission version of the Arundel Neighbourhood Plan Review in November – December 2018 and the comments made on both documents have been considered by the Town Council in preparing the final version of the Submission Plan and of this Final Sustainability Appraisal Report. The changes made to the plan are detailed in the Consultation Statement, as required by the Regulations. Minor editing and clarification were dealt with separately as a matter of course for all documents. The only comments of substance on the Draft Sustainability Report was submitted by ADC, who raised concerns that the sustainability process was not followed correctly as a screening determination was not sought.

1.7 As such, the Town Council formally requested a screening opinion from ADC. ADC issued an undated screening determination received on 1 May 2019 that determined that an environmental assessment is required. The determination included additional comments on the scoping report, and minor revisions has as a result been made to the Final Sustainability Report. Most notably the inclusion of assessing the tourism strengths of the South Downs National Park.

1.8 The Town Council is also mindful of the work being undertaken in parallel by ADC in respect of its Non-Strategic Sites Development Plan Document. That document is being prepared in parallel with the reviews of neighbourhood plans in the District to cover those parts of the District without up-to-date neighbourhood plans. ADC intends to use it to set housing delivery targets for each Parish and to allocate non-strategic housing sites. In both respects, the Document will be informed by its own Sustainability Appraisal. ADC has since confirmed that the target figure for Arundel is at least 50 homes.

1.9 The Final SA report provides an assessment of the policies of the Neighbourhood Plan in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts at this relatively small scale. The framework of appraisal objectives takes into account the comments made on the scoping report by the statutory consultees.

Habitat Regulations Assessment

1.10 In addition, the District Council determined that the Neighbourhood Plan Review would be required to show how it meets the obligations of the EU Habitats Directive 1992 as framed in UK law by the Conservation of Habitats & Species Regulations 2017 ("the Habitat Regulations").

1.11 The Regulations have required the 'competent authority' – ADC in this case – to screen for the potential of the Review to have likely significant effects (LSE) on the Arun Valley Special Protection Area (SPA), and have required the Town Council to provide ADC with relevant information for the screening to be undertaken. A technical report was published by consultants AECOM on behalf of the Town Council in October 2018 at the time of the Pre-Submission Review. It confirmed there are some LSEs of proposals in the Review on the SPA, which lies 6km to the north of the town, and of the use of land in the Parish by the Bewick's Swan. It concluded that these LSEs could not be screened out without appropriate mitigation measures and ADC agreed with this conclusion.

1.12 As a result, ADC has prepared an 'appropriate assessment' of the effectiveness of the mitigation measures proposed in the relevant Review policies to address the LSEs. The AECOM report has been updated to provide the necessary information to ADC in this respect and ADC has concluded that the measures have enabled the LSEs to be screened out. Both reports are published separately.

2. BACKGROUND TO SUSTAINABILITY APPRAISAL

2.1 The potential for significant social, economic and environmental effects of the Neighbourhood Plan is tested through the Sustainability Appraisal to ensure any harmful effects are avoided or satisfactorily mitigated. The Appraisal may also highlight where positive effects may be created and reinforced.

2.2 The methodology for the appraisal is intended to be proportionate to the task of assessing the modest development proposals of a community-led, Neighbourhood Plan. A summary of the process, as derived from the Planning Practice Guidance Flowchart, is contained in Table A below.

The Sustainability Appraisal Process (inc. Strategic Environmental Assessment)	
Screening	<p>STAGE A: This stage is undertaken by the local planning authority to determine whether the neighbourhood plan is likely to have significant environmental effects.</p> <p>If it considers there is the potential for such effects then it issues an opinion to that effect. If it does not consider there is potential for such effects, then it must consult the statutory consultees - Natural England, Historic England and the Environment Agency – before issuing its final screening opinion.</p> <p>The qualifying body may choose to undertake a Sustainability Appraisal to incorporate a Strategic Environmental Assessment or to focus solely on an Assessment, using the Basic Conditions Statement to explain how the Plan contributes to the achievement of sustainable development. The qualifying body may make this decision without obtaining a screening opinion.</p>
Scoping	<p>STAGE B: This stage sets the context of the appraisal by identifying the baseline data and establishing its scope.</p> <ol style="list-style-type: none"> 1. Identification of relevant plans, policies and programmes. Any existing requirements that need to be taken into account or incorporated into the plan are identified. 2. Review of baseline information. Data about sustainability issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation. 3. Identification of sustainability issues. The review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan. 4. Development of the Appraisal framework. The appraisal criteria used to assess the impact of the plan or programme. 5. Identification of initial plan options. Taking into account best practice initial identification of options and reasonable alternatives undertaken. 6. Consultation. On the scope and alternatives for appraisal it is necessary to consult statutory consultees.
Assessment	<p>STAGE C: This stage involves the appraisal of the any likely significant effects of the plan policies (and any reasonable alternatives) on the key sustainability issues identified.</p> <ol style="list-style-type: none"> 1. Finalisation of the Plan options and alternatives for testing 2. Testing the Plan objectives against the Appraisal Framework. The Plan Objectives are tested to understand how they relate to the framework 3. Evaluation of plan policies and alternatives. The Framework is used to assess various plan policies by identifying their potential sustainability effects and to assist in the refinement of the policies.

	<p>4. Predicting and evaluating the effects of the plan. To predict the significant effects of the plan and assist in the refinement of the policies.</p> <p>5. Consideration of ways to mitigate adverse effects and maximise beneficial effects. To ensure that all potential mitigation measures and measures for maximising beneficial effects are identified.</p> <p>6. Proposing measures to monitor the significant effects of implementing the Plan: To detail the means by which the sustainability performance of the plan can be assessed and monitored.</p> <p>This appraisal is used to feed into the development of the Plan to help understand the sustainability implications of the policies and the results are used to inform policy.</p>
Reporting	<p>STAGE D: Preparation of the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> The findings of the appraisal together with how it has influenced the development of the plan are identified and set out in a draft report together with the recommendations on how to prevent, reduce, or offset any significant negative impacts arising from the plan. <p>STAGE E: Consultation – seek representations from consultation bodies and the general public</p> <ul style="list-style-type: none"> This is an ongoing process. Consultation of the draft report is undertaken into account and used to influence further iterations of the sustainability appraisal process. The final report is published alongside the Plan as part of the submission documentation for independent examination.
Adoption and Monitoring	<p>STAGE F: Following the making of the Plan, the effects of implementing the plan are measured and any adverse effects are responded to. The results are fed into the future plans and assessments.</p>

Table A: Sustainability Appraisal Process

2.3 Since the Scoping Stage B was completed, the focus has been on policy choice and formation. As discussed in Sections 7 and 8, in some cases there have been some alternative policy approaches to assess using the framework of sustainability objectives. In others, the policies have been compared with a 'policy off' alternative.

3. NEIGHBOURHOOD PLAN OBJECTIVES & OTHER PLANS & PROGRAMMES

3.1 In this section is summarised the nature and scope of the various plans and programmes that form the context of the Neighbourhood Plan, as well as the Plan vision, objectives and policies.

The Neighbourhood Plan Review

3.2 The vision and key objectives of the Review is the same as the made Plan, as the role of Arundel in the Arun District and South Downs National Park, and the issues it faces, have remained similar. The vision of the neighbourhood area in 2031 is that:

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

At the same time, the town will have grown modestly to provide wider housing opportunities of a range of types to meet local demand and need, including new affordable homes provided by a Community Land Trust. This growth will have bolstered the town's shops, services and community facilities. Over this period Arundel's reputation as an important market town, cultural centre and creative hub will grow, and the local economic base will be strengthened.

The town will also have benefited from the new A27 Bypass and from works to manage traffic and to promote walking and cycling within the town. There will also have been improvements to the local rail network and facilities to encourage greater use of rail services for commuting and other trips.

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

3.3 To achieve this vision the key objectives are:

- To maintain and enhance the nationally and locally important heritage assets and special character of the town and its setting
- To plan and deliver a range of housing mix and types that encourage and enable young people to live in the town in locations with good access to services and facilities by foot and bus as well as car
- To secure the long term future of community and cultural facilities that help make the town special
- To sustain a thriving town centre offering a range of goods and services to the local community and visitors
- To reduce the harmful impact of road traffic on the local community and the town's heritage assets

- To plan for climate change and work in harmony with the environment to conserve natural resources to conserve natural resources

3.4 The Review contains the following policies:

- AR1 Arundel Built Up Area Boundary
- AR2 Land off Ford Road
- AR3 Land at Fitzalan Road ('Blastreast and Greenhurst')
- AR4 The Police Station, The Causeway
- AR5 Swallow Brewery – Local Heritage Asset
- AR6 Community Facilities
- AR7 Arundel Town Centre
- AR8 Business Hubs
- AR9 Green Infrastructure Network
- AR10 Canada Gardens

National Planning Policy

3.5 The National Planning Policy Framework (NPPF), originally published by the Government in 2012 and subsequently revised in July 2018 and in February 2019, is an important guide in the preparation of local plans and neighbourhood plans.

3.6 The following paragraphs of the NPPF 2019 are considered especially relevant:

- The presumption in favour of sustainable development (§11)
- Sustainable, inclusive and mixed communities (§61)
- Supporting a prosperous rural economy (§83)
- Vitality of town centres (§85)
- Promoting healthy and inclusive communities (§91)
- Social, recreational and cultural Facilities (§92)
- Natural environment and landscape (§170 – §177)
- Heritage assets (§184 - §197)

Local Planning Policy

3.7 The Neighbourhood Plan must also be able to show that its policies are in general conformity with the strategic policies of the development plan, which now comprises the Arun District Local Plan 2011-2031. A number of policies of the made Neighbourhood Plan have not been reviewed as they remain relevant and up-to-date in their existing format (see below), others have been replaced by policies of the Review.

3.8 A number of policies in the Arun Local Plan provide a policy framework for the Review:

- SD SP1 Sustainable Development – defines how the presumption in favour of sustainable development contained in the NPPF will be applied.
- SD SP1a Strategic Approach – the policy makes specific reference to enabling development in Arundel that recognises the sustainable and historic character of the town with its historic buildings set at the foot of the South Downs.

- SD SP2 Built-Up Area Boundary (BUAB) – defines BUAB for the main towns and villages.
- C SP1 Countryside – defines areas outside of the BUAB as countryside.
- GI SP1 – Green Infrastructure and development – defines a Green Infrastructure Network to encourage protection and enhancement.
- LAN DM1 Protection of landscape character – Safeguards the setting of the South Downs National Park.
- LAN DM2 The Setting of Arundel – Safeguards the setting of Arundel.
- EMP DM1 Employment Land – Seeks to protect and enhance existing employment sites and sets out approach to employment land.
- RET SP1 Hierarchy of Town Centres – Requires Arundel to maintain its existing role as a service centre providing both a range of shops and services for the local population and fulfilling a specialist role as a tourist and visitor destination and draws Primary and Secondary Shopping Frontages.
- RET DM1 Retail development – Sets out criteria for town centre uses.
- TOU SP1 Sustainable tourism and the visitor economy – Seeks to protect and promote tourism assets.
- H SP1 The housing requirement – allocates a number of Strategic Site Allocations across the District. There are no allocations in Arundel but the policy requires that 1,250 homes need to be delivered through 'non-strategic' housing site allocations, including through Neighbourhood Plans.
- AH SP2 Affordable Housing – requires 30% affordable housing on sites of 11+ homes.
- HWB SP1 Health & Wellbeing – Requires design to maximise health & wellbeing.
- HER SP1 The Historic Environment – seeks the protection of the historic environment.

3.9 The policies do not seek major change in Arundel, but there is a requirement for the Review to make some contribution to meeting the overall housing supply target set out in Policy HSP1. ADC intends to distribute that target across the towns and parishes in its area to inform the preparation of neighbourhood plans and its own 'Non-Strategic Sites Development Plan Document' (NSSDPD) for those areas without neighbourhood plans. It will test its distribution proposals through its Sustainability Appraisal of the NSSDPD and has confirmed for the purposes of the preparation of the Arundel Neighbourhood Plan Review that the figure for Arundel is at least 50 homes.

3.10 The following list of policies from the made Plan are retained as they have not been replaced by this Review:

- Policy 1 The Presumption in Favour of Sustainable Development
- Policy 4 Housing Site Allocations
- Policy 6 Transport, Access & Car Parking
- Policy 7 The Victoria Institute
- Policy 8 Arundel Lido
- Policy 9 Mill House Farm
- Policy 10 Assets of Community Value
- Policy 11 Local Green Spaces
- Policy 12 Flood Defences
- Policy 13 Buildings and Structures of Character

3.11 These retained policies essentially utilise brownfield sites, promote sustainable travel and protect Local Green Spaces and non-designated heritage assets from harmful development.

3.12 As explained above, part of the Neighbourhood Area also lies within the boundary of the SDNPA and its development plan primarily comprises the South Downs Local Plan 2014-2033. The following policies are considered especially relevant:

- SD4 Landscape Character – sets out how development proposals will be expected to conserve and enhance landscape character in the National Park.
- SD5 Design – seeks high quality design.
- SD6 Safeguarding views – seeks to conserve and enhance key views and views of key landmarks within the National Park.
- SD8 Dark Night Skies – seeks to avoid harm and encourages enhancement of dark night skies.
- SD9 Biodiversity and Geodiversity – seeks to retain, protect and enhance features of biodiversity and geological interest.
- SD10 International Sites – requires development proposals on greenfield sites within 5km of the Arun Valley SPA to undertake an appraisal for suitable foraging for Bewick's Swan.
- SD12 Historic Environment – seeks to conserve and enhance the historic environment, including through the safeguarding of heritage assets and their setting.
- SD20 Walking Cycling and Equestrian Routes – safeguards and encourages enhancement of network of routes.
- SD23 Sustainable Tourism – seeks to encourage tourism and recreation development.
- SD43 New and existing community facilities – supports new and/or expanded community facility infrastructure subject to certain criteria and seeks to prevent the loss of existing facilities.
- SD45 Green Infrastructure – seeks to protect and enhance green infrastructure.

3.13 The adopted South Downs National Park Local Plan is part of the development plan for that part of Arundel which lies within the National Park.

3.14 It is noted that, although the submitted Plan acknowledges Arundel as one of a number of key 'gateways' to the National Park, it contains no specific policies for the town.

Other Plans & Programmes

3.15 There are other development plans – waste and minerals for example – that apply in the Parish, but none are considered relevant to the appraisal of this Neighbourhood Plan.

3.16 Highways England has recently announced its preferred route for the A27 Arundel Bypass around the south of the town, but further consultation on all three route options will take place later in 2019. If implemented before the end of the plan period, it is anticipated that this project will have very significant positive effects on the town in terms of removing much of the traffic using the current A27 route. However, there will also be some inevitable harmful environmental effects along its route.

3.17 The Town Council has been mindful of this project and its consequences, but until it is committed, and its details are known, the Council has chosen to avoid bringing forward proposals with a dependency on the project.

4. LOCAL SUSTAINABILITY CHARACTERISTICS & ISSUES

4.1 A summary of the baseline information is contained in the separate Scoping Report of October 2018, which is published as part of the evidence base for the Plan. Detailed below are the main sustainability characteristics, which includes revisions due to the comments made by the statutory bodies in the Scoping Report and ADC in its subsequent screening determination.

4.2 For completeness the baseline data plans are attached to this report as Appendix A.

Title	Source	Data	Trends & Consequences
Population & Health	Arun District Council Community Profile for Arundel (see separate report)	Arundel Parish lies in the northern part of the district of Arun in the county of West Sussex and within the South Downs National Park. The population of Arundel is approximately 3,475 in 1,690 dwellings.	The historical development of Arundel has resulted in a rich built environment set against the impressive backdrop of the River Arun, Arun Valley and Arundel Park. Any future growth is likely to have environmental consequences for the town which the neighbourhood plan will aim to mitigate.
Retail and Employment	2017 Economy and Enterprise Paper for ALP Arun Local Plan 2011-2031 Chapter 9	Identifies Arundel as a smaller centre that provides good range of shops and services to meet local needs and is considered to be a specialist retail destination for services such as restaurants and other leisure activities. Arundel defined as a medium sized centre with a multiple role: Historic market town and Tourist and Visitor destination and Cultural Centre and is required to provide range of shops and services for	Ensuring the vitality of the town centre and identifying employment opportunities in Arundel will be important to sustain future growth.

		local population and tourists and visitors.	
Listed Buildings and other Heritage Assets	<p>West Sussex Historic Environment Record</p> <p>See HER Data within Arundel Parish Boundary attached at Appendix A. A separate data report has been acquired from the data office and has been reviewed.</p>	<p>There are 215 listed buildings and structures (including the Grade I Arundel Castle (including the Grade II* Park and Garden and Scheduled Monument that protect earthworks and archaeological remains of the Castle), Church of St. Nicholas, Fitzalan Chapel and Roman Catholic Cathedral of St. Philip Neri and the Grade II* Hiorn's Tower, 22 High Street (Norfolk Hotel), 51 High Street, 61 High Street, The Priory (St. Wilfred's) and 26 Maltravers Street (The Vicarage) and the Scheduled Monument of Maison Dieu).</p>	<p>The renowned historic and cultural character of Arundel has been maintained and listed buildings and structures are well protected by planning policy. The National Park and its setting have been relatively untouched by development in recent years, but enhancement has been limited.</p> <p>The Plan could explore how development in the setting of the National Park could contribute to Arundel's special character, built environment and landscapes.</p>
Conservation Area	<p>Arun District Council</p> <p>Conservation Areas Supplementary Planning Guidance</p>	<p>Arundel Conservation Area covers the majority of the historic town area. There is no Conservation Appraisal, but a description of the Conservation Areas is contained within ADC's Conservation Areas Supplementary Planning Guidance.</p>	
Landscape Designations	<p>Arun District Council</p>	<p>The northern half of the parish of Arundel falls in the South Downs National Park which is also an International Dark Skies Reserve.</p>	
Air Quality	<p>2018 Air Quality Annual Status Report</p>	<p>There are locations within the parish that are monitored, and the A27 Arundel bypass is a</p>	<p>A continued low level of NO2 in the District compared to the national trigger level</p>

	Highways England	<p>key measure in addressing Air Quality.</p> <p>The current preferred route for the A27 Arundel bypass includes a new dual carriageway between Crossbush in the East and a new junction between Binsted Lane and Yapton in the west, as well as new dedicated paths for cyclists and pedestrians to draw traffic away from Arundel town centre.</p>	<p>mean that no AQMAs are required within Arun District Council's area. However, road congestion during peak periods on the A27 continues to cause poor air quality. Even with the construction of the A27 Arundel Bypass in the future, this could still be under pressure as a result of increased car journeys, congestion, climate change and other factors. The plan could minimise this pressure by considering how development proposals could improve sustainable transport methods.</p>
Nature Conservation	<p>Magic Map</p> <p>Arun Local Plan Habitats Regulations Assessment</p>	<p>The Parish contains one Site of Special Scientific Interest (SSSI) at Arundel Park. There are no local nature reserves, but significant ancient woodland within the SDNP boundary and two West Sussex Sites of Nature Conservation Importance (SNCI) at Rewell Wood and at Binsted Wood. There is also a large Site of Local Importance for Nature Conservation (SINC) within the SDNP boundary. A small part of Arundel NP area falls within 5km of the Arun Valley Special Protection Area and a larger part within the Impact Risk Zone which identifies land which might be used by</p>	<p>Arundel Park SSSI is one of the most important sites in the country for invertebrates including a number of rare and notable species. The Plan should avoid proposing development in or in close proximity to the SSSI, SNCI's and SINC, but may consider how proposals may add to current habitat connectivity.</p> <p>The small area of woodland within 5km of the Arun Valley Special Protection Area is rural in nature and located some distance from Arundel town, however the plan should avoid the</p>

		feeding Bewick swans.	loss of land that is important as supporting habitat for Bewick Swans, which will be considered through a Habitats Regulations Assessment that will accompany the ANPR.
Flooding	Environment Agency Arun DC SFRA Update 2016 report (see separate report)	Large parts of Arundel lie within Flood Zone 3, and forms part of proposals by the Environment Agency to undertake flood defence works in the parish over the next twenty years as set out by the Lower Tidal River Arun Strategy.	The ANP1 safeguards land for the Strategy and the policy will be saved. The review should continue to ensure appropriate measures are taken in allocating development within flood zones.

Table B: Baseline data

4.2 The planning context and the baseline evidence indicate that the key sustainability issues relate to protecting and enhancing Arundel's renowned historic and cultural character. At present, there is no requirement for major growth, and development over the last few years has primarily utilised brownfield sites. This has not prevented traffic congestion problems, and there remain flood risks, connectivity issues and problems of access to affordable housing. But the main environmental qualities of the Parish have more or less remained undisturbed.

4.3 The A27 Bypass project is now further advanced than at the time of the made Plan, with Highways England having announced a modified version of Option 5A as their preferred route, but further consultation on all three route options will take place later in 2019. The route includes a new dual carriageway bypass between the Crossbush junction to the east of Arundel and a new junction between Binstead Lane and Yapton Lane to the west. It is anticipated that the project will have very significant positive effects for the town in terms of relieving traffic congestion and enabling the re-planning of the current road and junctions.

4.4 In terms of managing future development the key sustainability issues are:

Flood Risk

- Being able to manage and mitigate against all sources of flooding;
- Continuing to support related infrastructure to help protect homes and businesses and manage flood risk elsewhere.

Climate Change

- Increasing demands placed on the Parish's recreation and wildlife areas due to warmer and drier weather patterns;
- Recognition that changes to the climate will bring new challenges to these recreation and wildlife areas due to extended growing seasons, increased vulnerability of some native species and the migration of new species (including the potential for alien introductions);
- Adverse environmental and health impacts associated with increases in air, soil and water pollution from an increase in the local population, made worse by increasing temperatures and less rainfall.

Population and Health

- Maintaining an adequate housing supply, incorporating a mix of housing types to meet the needs of the local area;
- The opportunity to increase the number and variety of affordable homes and new types of tenure, notably through the new Arundel Community Land Trust;
- There will be increases in the demand for, as well the operational impacts on, key local services, such as health, education and social care if the local population grows over the plan period;
- The safety of motorists and ability to utilise other transport methods must improve.

Economic Development

- Desire to make provisions for local jobs growth to maintain the sustainability of the town;
- The opportunity to enhance the vitality and viability of local shops and commercial services.

Heritage and Landscape

- Protecting the large number of listed buildings, non-designated heritage assets, the Conservation Area and archaeology in the Parish from harmful development
- Protecting the setting of Arundel from harmful development
- Conserving and enhancing the landscape of the National Park, including important views

Biodiversity

- Ensuring Priority Habitats/Species and other locally endangered species are protected from destruction by inappropriate development or land management practice
- Ensuring no loss of land that is important as supporting habitat for Bewick's Swans
- The opportunity for improvements/net gains in biodiversity, habitat connection and multifunctional green infrastructure

Air quality

- Planning for new development in a way and in locations that may make existing traffic congestion no worse.

5. THE APPRAISAL FRAMEWORK

5.1 The sustainability objectives forming the appraisal framework are set out in Table C below:

Objective Title	Objective	Headline Measures
Heritage & Local Distinctiveness	To maintain and enhance the nationally important historic character of the town, and the distinctiveness of its built environment.	<ul style="list-style-type: none"> Will the Plan conserve and enhance areas, sites and buildings that contribute to the natural and cultural (including archaeological and architectural) heritage of the District? Will the Plan conserve the setting, and avoid neglect leading to decay, of heritage assets? Will the Plan promote access to and enjoyment of the District's historic environment and countryside?
Landscape Character	To conserve and enhance the special landscape and scenic beauty of the National Park and the distinct character of the Arun Valley.	<ul style="list-style-type: none"> Will the Plan ensure development conserves and enhances the National Park and its setting within and beyond the town? Will the Plan ensure development respects the setting of Arundel across the Arun Valley?
Biodiversity & Climate Change	To conserve and enhance biodiversity and plan for the potential effects of climate change.	<ul style="list-style-type: none"> Does the Plan avoid loss or damage to existing biodiversity or geodiversity assets? Does the Plan realise opportunities to enhance and connect existing biodiversity and geodiversity assets? Does the plan incorporate measures to adapt to the potential effects of climate change?
Population & Health	To contribute to meeting local housing needs and to encourage a healthy local community.	<ul style="list-style-type: none"> Does the Plan allocate land for a range of housing types and sizes, including affordable housing? Does the plan improve accessibility to and enhance local services and facilitates? Does the plan encourage walking and cycling in the town?
Economy and Tourism	To maintain a competitive and vibrant local economy and tourism offer.	<ul style="list-style-type: none"> Does the plan identify opportunities in land and property for new business development? Will the plan build on the tourism strengths of the town and the National Park? Will the plan maintain a vital and viable town centre?

Flood Risk	To reduce the risk from all sources of flooding.	<ul style="list-style-type: none"> Does the plan avoid inappropriate development in flood risk areas? Will the plan ensure all new development comprise effective measures to tackle flood risk?
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Table C: Appraisal Framework of Objectives

5.2 The objectives have been informed by those in the Local Plans' Sustainability Appraisals but have been refined to fit this specific Neighbourhood Plan and its baseline evidence. They are considered to be the most relevant to enable a proper assessment of the potential for sustainability effects in this area and at this scale. The potential for any other significant effects has been screened out as part of this process to ensure the appraisal is proportionate to the task in hand.

6. APPRAISAL OF NEIGHBOURHOOD PLAN OBJECTIVES

6.1 The Neighbourhood Plan has six strategic objectives:

- To maintain and enhance the nationally and locally important heritage assets and special character of the town and its setting
- To plan and deliver a range of housing mix and types in locations with good access to services and facilities by foot and bus as well as car
- To secure the long term future of community and cultural facilities that help make the town special
- To sustain a thriving town centre offering a range of goods and services to the local community and visitors
- To reduce the harmful impact of road traffic on the local community and the town's heritage assets
- To plan for climate change and work in harmony with the environment to conserve natural resources

6.2 A summary of the appraisal of the Neighbourhood Plan objectives against the sustainability objectives is provided in Table D below. A simple 'scoring' system is used to show positive (+), neutral (0) or negative (-) effects and an explanation is provided in the text below.

Sustainability Objectives		Neighbourhood Plan Objectives					
		1. Heritage Assets	2. Housing Supply	3. Community Facilities	4. Town Centre	5. Traffic	6. Climate Change
1	To maintain and enhance the nationally important historic character of the town, and the distinctiveness of its built environment.	+	+/-	+/-	+/-	+	0
		There is a strong correlation between this objective and the heritage objective of the plan. The heritage of the town is nationally important and it is vital that its variety of assets are conserved. The housing supply, community facility and town centre objectives all have the potential for adverse effects if they are achieved in ways that will compromise heritage assets in the planning balance. But there is also potential for policies to deliver positive effects, for example in securing new beneficial uses or improving their settings. The plan's traffic and climate change objectives both complement this sustainability objective. Traffic and parking in the town is a particular problem on the appearance of the Conservation Area and listed buildings.					

2	To conserve and enhance the special landscape and scenic beauty of the National Park and the distinct character of the Arun Valley.	+	-	0/-	0	0	+
		There is the potential that new development will harm the setting of the National Park and/or the setting of Arundel across the Arun Valley, as some greenfield land on the edge of the town will be needed to meet local housing supply. However, careful planning and mitigation measures, and choosing the right locations for growth, should limit the adverse effects. There is a strong correlation between the plan's heritage and climate change objectives and this appraisal objective. Much of the town's heritage is enjoyed from across its landscape setting, especially from the south. And the landscape is an essential part of the natural resources of the neighbourhood area. There is the potential for an adverse effect on the landscape in planning for the improvement of community facilities, but this will be avoided with careful site selection and planning.					
3	To conserve and enhance biodiversity and plan for the potential effects of climate change.	0	-	0	0	0	+
		There is the potential that new development will harm local biodiversity value (and disturb land used by the Bewick Swan), as some greenfield land on the edge of the town will be needed to meet local housing supply. However, careful planning and mitigation measures confirmed in the Appropriate Assessment, and choosing the right locations for growth, should limit the adverse effects. There is a strong correlation between the plan's climate change objectives and this appraisal objective.					
4	To contribute to meeting local housing needs and to encourage a healthy local community.	0/-	+	+	+	0/-	0/-
		The plan's housing objective will have a positive effect in delivering new homes of a range of type and sizes, including affordable homes, to meet local needs and in increasing footfall in the town centre. Improved community facilities will have a positive effect on encouraging a healthy community. There is the potential that new development will have adverse heritage, traffic and climate change effects as some housing development will be needed to meet local housing supply. However, careful planning and mitigation measures, and choosing the right locations for growth, should avoid or limit such effects.					
5	To maintain a competitive and vibrant local economy and tourism offer.	0/-	+	0	+	0/-	0/-
		The plan's town centre objective will have a positive effect in supporting the majority of jobs, which are located in the centre. Its housing objective will have a positive effect in increasing footfall in the town centre. There is a strong correlation between the town and National Park as it forms one of the main 'gateways' to the Park for visitors using its accommodation. The Park therefore also has the potential to see positive effects from this objective. Economic development has the potential for adverse heritage, traffic and climate change effects. However, careful planning and mitigation measures, and choosing the right locations for growth, should avoid or limit such effects.					
6	To reduce the risk from all sources of flooding.	0	0/-	0	0	0	+
		There are large parts of the parish that are subject to flooding. There is therefore the potential for adverse effects in the location of new housing, either within or close to land subject to flood risk. However, careful planning and mitigation measures, and choosing the right locations for growth, should avoid or limit such effects. There is a strong correlation between this objective and the climate change objective of the plan.					

Table D: Appraisal of Neighbourhood Plan Objectives

7. APPRAISAL OF NEIGHBOURHOOD PLAN POLICIES

7.1 The Neighbourhood Plan contains six policies in pursuit of its strategic objectives. In Table E below these policies are assessed against each of the sustainability objectives. Again, the information sets out the potential for positive (+), neutral (0) and negative (-) effects.

Sustainability Objectives		Neighbourhood Plan Policies									
		AR1: Arundel Built Up Area Boundary	AR2: Land off Ford Road	AR3: Land at Fitzalan Road	AR4: The Police Station, The Causeway	AR5: Swallow Brewery – Local Heritage Asset	AR6: Community Facilities	AR7: Arundel Town Centre	AR8: Business Hubs	AR9: Green Infrastructure Network	AR10: Canada Gardens – Local Green Space
1	To maintain and enhance the nationally important historic character of the town, and the distinctiveness of its built environment.	0	0	0	0	+	+	+	0	+	0
		<p>The international heritage renown of Arundel is crucial to protect and conserve. The three allocation policies AR2-AR4 have all taken this constraint fully in to account. The potential for adverse effects from the housing allocation at Ford Road (AR2) on the setting of both the nearby heritage asset (Tortington Manor) and the longer setting to the town are avoided through the development requirements of the policy to limit the developable area and confine it to land well away from the Manor and to frame a series of key design principles. These principles, together with the broader policy requirements of the Local Plan (which are not repeated), will also ensure that the scheme does not harm the setting to the town or its National Park backdrop.</p> <p>The heritage parameters for the 'Blastreat' site (AR3) were confined to its location in the setting of the town in the SA/SEA of the made Plan. In that case, as now, the limits on the capacity of the site and its density will avoid an unsuitably tall structure having adverse effects. However, the local heritage value of that part of the site containing elements of the Swallow Brewery is now better known and the policy therefore requires that redevelopment proposals seek to retain those elements, which is considered plausible by a separate technical report. The policy will therefore avoid an adverse heritage effect, and policy AR5 (identifying the brewery elements as having local heritage value) should have a positive heritage effect. The Police Station site (AR4) does not lie within the immediate setting of heritage assets.</p> <p>Many of the community facilities in policy AR6 are also heritage assets and so the policy will have positive heritage effects in seeking to protect and improve them. Similarly, much of the GI Network in AR9 provides an essential open setting to heritage assets and the policy will also have positive heritage effects. Policy AR7 is intended to support the economic success of the town centre so that its many heritage assets are in beneficial economic use. It allows for changes of use to maintain this vibrancy, rather than leaving premises vacant.</p>									

2	To conserve and enhance the special landscape and scenic beauty of the National Park and the distinct character of the Arun Valley.	+	-	0	0	0	0	0	0	+	+
		<p>The Built Up Area Boundary policy AR1, along with policies of the Local Plan, will continue to contain new development within the town boundary, which will have a positive landscape effect. The GI Network of Policy AR9 and Local Green Space designation of Canada Gardens at Policy AR10 will also have a positive landscape effect in protecting the network of assets, which extend into the surrounding countryside setting of the town, from harmful development.</p> <p>The allocations in Policies AR3 and AR4 lie within the existing Built Up Area Boundary and will have no adverse landscape effect. The Police Station site lies within the Setting to Arundel policy area, but the policy requires a scheme to consider this in the design of the height of any new buildings. The other allocation at land at Ford Road will inevitably have an adverse landscape effect as it comprises greenfield land on the edge of the town that lies within the Setting to Arundel policy area and within the wider setting of the National Park boundary. There is no greenfield, edge of town land that will not have such an effect. However, the scale of this effect ought to be moderated by the policy requirements in respect of developable area, scheme layout, building design and landscape scheme.</p>									
3	To conserve and enhance biodiversity and plan for the potential effects of climate change.	0	+	0	0	0	0	0	0	+	+
		<p>Policy AR2 requires a biodiversity strategy to ensure there is no net loss of habitat for the Bewick's Swan and a net gain in biodiversity in general and this is sufficient safeguarding as confirmed in the HRA. This will lead to a positive biodiversity effect. Policy AR9 defines the green infrastructure network and encourages its connectivity, complementing existing biodiversity value through design of landscape scheme and resisting changes that undermine existing value, having a positive effect on biodiversity as well as encouraging the functionality of the Network to enable more walking and cycling. Policy AR10 designates Canada Gardens as a Local Green Space, which will form part of the green infrastructure network encouraging connectivity and complementing biodiversity value.</p>									
4	To contribute to meeting local housing needs and to encourage a healthy local community.	0	+	+	+	0	0	0	0	+	+
		<p>The site allocations and housing mix requirements in Policies AR2 – AR4 will have very positive effects on meeting the needs of target (less represented) demographic sectors in the local population. All three aim to deliver the type of homes that have to be a lower purchase/rental cost than the average in the town to attract young people to begin to rebalance an aging community. Policy AR2 also requires connections for pedestrian, cycle and vehicle access to the existing network having a positive effect on improving accessibility to promote healthy lifestyles and wellbeing. Policy AR9 encourages the improvement of the Local Green Infrastructure Network having a positive effect on increasing walking and cycling routes in the town as well as the designation of a Local Green Space at Policy AR10. In addition, this will protect the land for recreational use by the local community and will therefore have a specific positive health effect.</p>									
5	To maintain a competitive and vibrant local economy and tourism offer.	0	+	+	+	0	0	+	+	0	0
		<p>Together, the housing allocation policies (AR2-AR4) will lead to a modest increase in the local population, which ought to lead to more footfall in the town centre, where most of the town's jobs are located, thereby having a positive effect. Policy AR7 aims to boost the economic performance of the town centre, resulting in the potential for another positive effect. Policy AR8 encourages future investment in business hubs to create new jobs in the town and will therefore also have positive</p>									

		economic effects. The success of the town centre ought to benefit the National Park as it forms an important gateway for visitors to the Park. Measures to improve car parking and to encourage walking around the town may also have positive tourism effects in managing visitor pressures on the edge of the Park.									
6	To reduce the risk from all sources of flooding.	0	0	0/-	0/-	0	0	0	0	+	0
		As parts of the GI Network in AR9 perform a flood management role, the policy will have a positive effect. The allocation sites in policy AR3 and AR4 lie within Flood Zone 3 but both are brownfield sites and both lie in areas of the town that benefit from flood defences. However, the allocation policy for each requires that flood risk assessments are undertaken when schemes are proposed in due course, resulting in those having the potential for adverse flood effects that may be avoided or partially mitigated through scheme design.									

Table E: Appraisal of Proposed Neighbourhood Plan Policies

7.4 The appraisal indicates that there is the potential for many positive and some adverse effects, but the latter have been generally avoided or mitigated by as a result of the policy provisions.

The Potential for Cumulative Effects

7.5 The effects identified in this appraisal need to be considered in combination with the effects of other policies and proposals. In this respect, it is considered that the effects of the strategic allocations at Ford, Climping, Yapton and Littlehampton, and the A27 Bypass project, are the most relevant. There may be other, non-strategic site allocations in these and other towns/parishes in this part of the District in due course, but these are not likely to be of a similar scale. The scale of the effects arising from the Neighbourhood Plan proposals will be small in comparison.

7.6 The main cumulative effects of these proposals on Arundel will be moderate with respect to traffic around the town and through the town centre and on its heritage. The larger population living within 5 miles of the town is likely to increase leisure trips to the town centre and its heritage assets. The A27 Bypass scheme when taken to the design stage is expected to make a profound and positive difference in diverting the vast majority of present and future trips around and through the town. The present A27 route, if the bypass goes ahead, will be downgraded. Its effect ought to mean that trips destined for Arundel and its town centre will be better accommodated on the local road network. With additional car parking capacity provided adjoining the town centre, it is likely that the traffic and heritage effects will be neutral.

7.7 Arundel is sufficiently separated from the strategic allocations to avoid any cumulative landscape or flood effects. Its proposals are much smaller than those allocations, so its biodiversity effects locally and on the Arun Valley are expected to be small and its policy provisions, as identified in the HRA, provide sufficient safeguards.

8. APPRAISAL OF REASONABLE POLICY ALTERNATIVES

8.1 The appraisal is obliged to consider any reasonable alternatives to the proposed policies. In practice, the only alternative to all the policies (with the exception of Policies AR2 – AR4) is that of having no policy (a 'Policy Off' position) and relying upon other development plan policies or national policy to manage the sustainability effects of proposals. The assessment considers that such an alternative would make no material difference to the sustainability outcomes.

Policies AR2 – AR4 Housing Site Allocations

8.2 These policies make provision for approximately 126 new homes, primarily on greenfield land on the SW edge of the town (Policy AR2) but also through the change of use and redevelopment of the 'Blastreat' works on Fitzalan Road (AR3) and the Police Station on the Causeway (AR4). It will therefore make a very positive contribution to the requirement of the new Local Plan Policy H SP1 for its plan period to 2031.

8.3 The Site Assessment Report explains how the sites allocated in Policies AR2 – AR4 are the only sites that are suitable, available and achievable for housing development in the plan period. All of the others considered were either not available in the plan period or had other reasons to be excluded from further consideration. Some were considered to have the potential for significant public benefits that may outweigh their environmental constraints (notably flood risk), but this crucially depended on them carrying clear community support. This support was not forthcoming in the engagement activities and so they too were excluded from further consideration.

8.4 In practice, there are no reasonable alternatives within each allocation policy either. The Ford Road (AR2) owner made it clear that the land would only be viable and therefore available for a scheme of approx. 90 homes as a minimum. The environmental constraints discussed in this report are such that increasing the size of the scheme would have too many adverse effects that could not be mitigated. At 'Blastreat' (AR3), the site must address its location in the flood zone and limit its scale to that which does not cause adverse heritage effects. A larger, taller scheme of uniform housing type and tenure that cannot retain the local heritage value is not policy compliant and is therefore not a reasonable alternative. Similarly, the size and location of the Police Station site (AR4) determine that it cannot accommodate significantly more development without having adverse heritage effects in terms of the setting to the town. Again, it is not considered reasonable to consider an alternative scheme of much greater scale.

8.5 In which case, the only alternatives to these policies are those that would result in a smaller total quantum of housing being allocated, or none at all and instead relying on windfall schemes coming forward within the Built Up Area Boundary or through allocations made in the District Council's Non-Strategic Sites Plan.

8.6 As the 'Blastreat' policy replaces that of the made Plan, and provides for the same quantum of development, which has been considered a commitment by the District Council in its housing trajectory, the only means of the Review delivering fewer homes would be the exclusion of the Ford Road site and retention of only the Police Station site. Having determined that the Review will make sufficient housing allocation provision to reach close to the 'indicative housing figure' set by the District Council, this is not considered a reasonable alternative.

8.7 If the Review does not contain housing site allocations then, as it is likely that the above 'figure' will still be set, then proposals will come forward as planning applications or as allocations in the District Council's plan. Although an alternative way of managing development, this is not a reasonable alternative for assessing the sustainability effects of the Review.

Other Policies

8.8 The "policy off" alternative applies to all other policies as it is not considered there are other reasonable spatial alternatives and the majority relate to development management matters. As the Local Plans covering the neighbourhood area covers these policy matters, the consequence of having no policy in the Neighbourhood Plan is considered neutral. There is the possibility that a lack of Arundel specificity may lead to less effective sustainable outcomes, but it is not considered to be material.

9. SUMMARY OF APPRAISAL

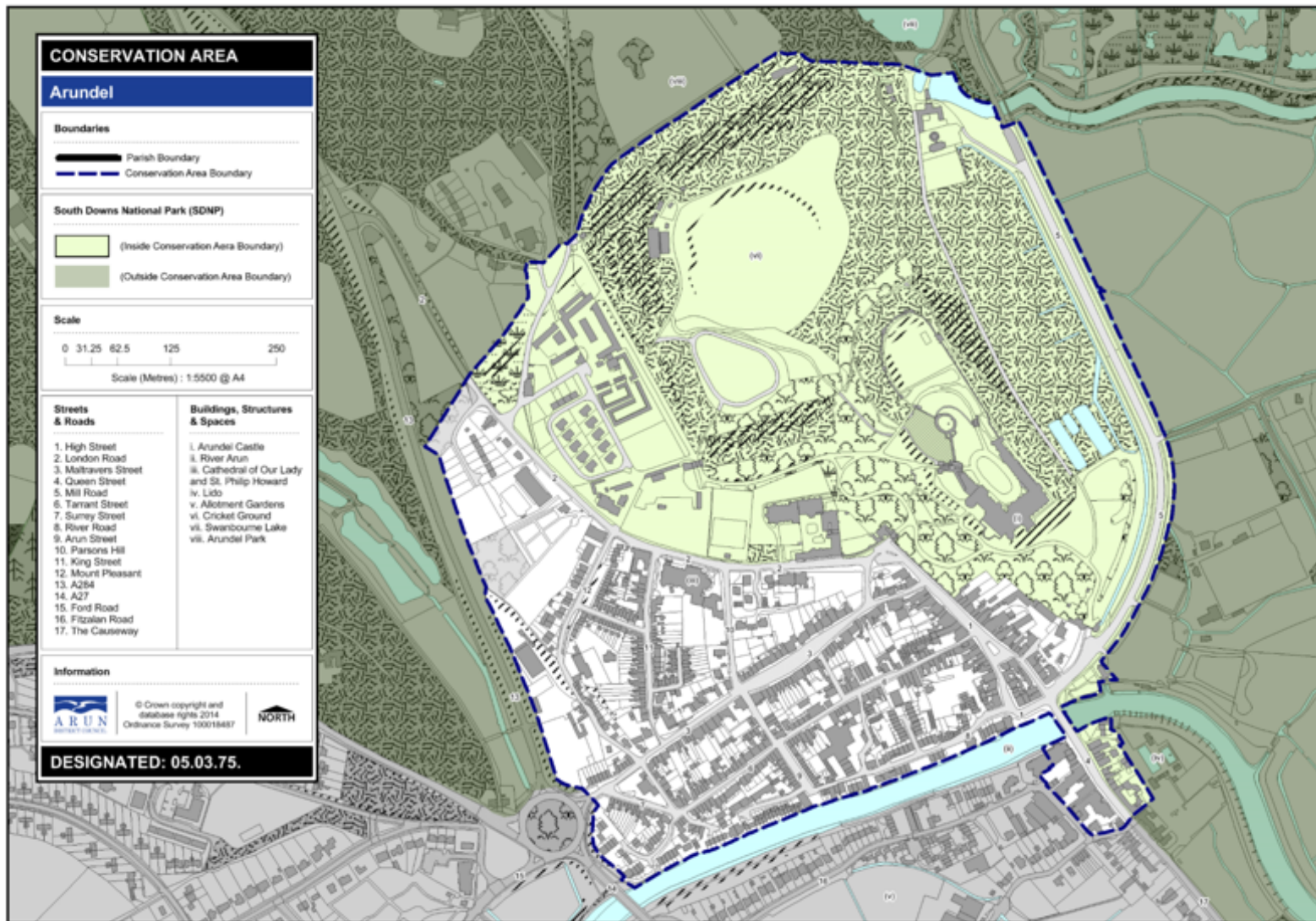
9.1 The appraisal indicates that the majority of effects of the objectives and policies of the Neighbourhood Plan will be neutral, but with important positive effects in some cases. However, there is the potential for some adverse effects, most notably in terms of managing the effects of growth in conserving and enhancing heritage assets, the special landscape character of Arundel and the flood risk constraints in the parish, but that such effects have been addressed through avoidance or mitigation measures.

9.2 It can be concluded that the Submission Neighbourhood Plan presents a suitable strategy for achieving sustainable development when considered against its reasonable policy alternatives and does not have the potential for significant adverse effects.

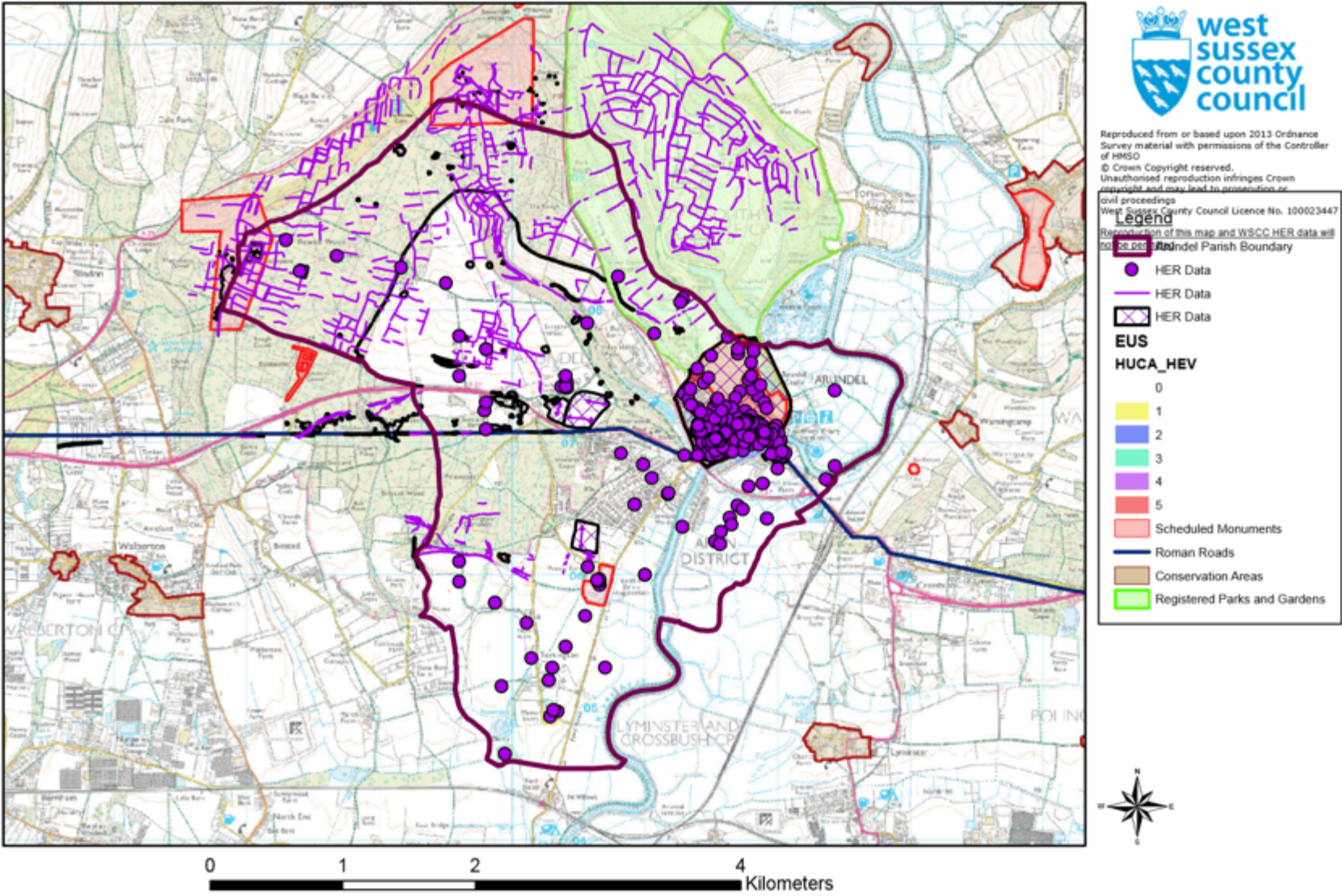
10. MONITORING THE APPRAISAL

10.1 The Neighbourhood Plan proposes that the progress in its implementation will be assessed using the measures for each objective set out in Table C of Section 5 of this report. The data for some of these measures is collected by the Local Planning Authorities in their planning monitoring reports. In other cases, the Town Council will endeavour to collect data on an annual basis to report on the implementation of the plan. Should any real or potential negative impacts be identified then the Town Council and Local Planning Authorities should seek to review the relevant policies and their implementation.

APPENDIX A – BASELINE DATA MAPS



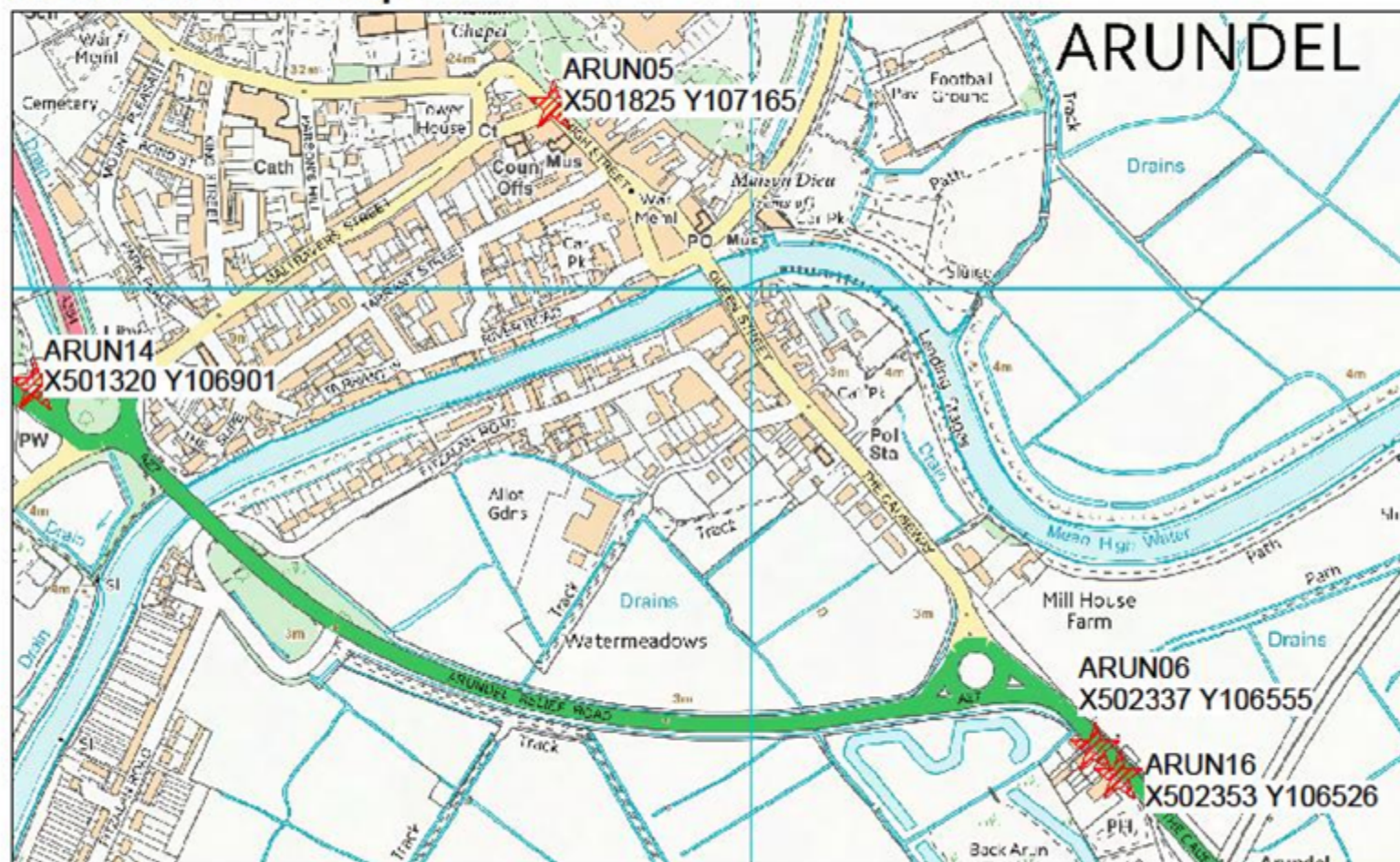
HER Data within Arundel Parish Boundary



Appendix D: Map(s) of Monitoring Locations and AQMAs

D1: Diffusion Tube Locations 2017 Arundel

Arun District Council Maps



Mapping produced by Arun District Council

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