



7 March 2017

This meeting will be broadcast live on our website at www.arun.gov.uk from 6.00 pm onwards.

SPECIAL COUNCIL MEETING

To all Members of the Council

You are summoned to attend a Special meeting of the ARUN DISTRICT COUNCIL to be held on WEDNESDAY, 22 March 2017 at 6.00pm in the Council Chamber at the Arun Civic Centre, Maltravers Road, Littlehampton to transact the business set out below:



Nigel Lynn
Chief Executive

AGENDA

1. **Apologies for Absence**
2. **Declarations of Interest**

Members and Officers are reminded to make any declaration of personal and/or prejudicial/pecuniary interests that they may have in relation to items on this agenda.

You should declare your interest by stating:

- a) the item you have the interest in
- b) whether it is a personal interest and the nature of the interest
- c) whether it is also a prejudicial/pecuniary interest
- d) if it is a prejudicial/pecuniary interest, whether you will be exercising your right to speak under Question Time

You then need to re-declare your prejudicial/pecuniary interest at the commencement of the item or when the interest becomes apparent.

3. **Question Time**

- a) Questions from the public (for a period of up to 15 minutes)
- b) Questions from Members with prejudicial interests (for a period of up to 15 minutes)
- c) To receive any petitions from the public

4. **Minutes**

To approve as a correct record the Minutes of the Council Meeting held on 8 March 2017 (which will be circulated separately).

5. **Chairman's Communications**

To receive such communications as the Chairman may desire to lay before the Council.

6. **Urgent Matters**

To deal with business not otherwise specified in the Council summons which, in the opinion of the Chairman of the Council (in consultation with the Chief Executive), is business of such urgency as to require immediate attention by the Council.

7. **Statute Matters**

To deal with any business expressly required by statute to be done.

There are no items for this meeting.

8. **Matters from the last Meeting**

To deal with any business remaining from the last Council meeting.

There are no items for this meeting.

9. Local Plan Sub-Committees – 6 and 9 March 2017

The Chairman, Councillor Charles, will present the Minutes from the Local Plan Sub-Committee meetings held on 6 and 9 March 2017, which will be circulated separately.

Councillor Charles will then present recommendations on the Arun Local Plan as follows:

- Arun Local Plan – Publication of Proposed Modifications Following Suspension of the Examination in Public
- Local Development Scheme

The appropriate Officer reports with the recommendations proposed are **attached**. A copy of the Pre-Submission Consultation – Arun Local Plan 2011-2031 document has been circulated to Members of the Council only. This document and other background information can be found by clicking on the following links:

<http://www.arun.gov.uk/evidence-base>

<http://www.arun.gov.uk/local-plan-examination>

<http://www.arun.gov.uk/local-plan-sub-committee>

ARUN DISTRICT COUNCIL

LOCAL PLAN SUB-COMMITTEE – 6 & 9 MARCH 2017

Subject : Arun Local Plan – Publication of Proposed Modifications Following Suspension of the Examination-in-Public

Report by : Neil Crowther, Head of Planning Policy & Strategic Development

Report date : 6 and 9 March 2017

NOTE ABOUT AGENDA ORDER FOR THE TWO MEETINGS

The Local Plan Sub-Committee meeting on the 6th March 2017 will consider issues relating to proposed modifications of the Local Plan (with the exception of Housing, Infrastructure Delivery and Transportation). It will also consider the following evidence base reports and background documents that support the modifications to the Local Plan;

- Sustainability Appraisal
- Habitat Regulations Assessment
- Housing Implementation Strategy
- Sequential and Exception Test to inform the Main Modifications
- Equalities Impact Assessment
- Consultation Statement
- List of Superseded Policies
- Employment Background Paper

The Local Plan Sub-Committee meeting on the 9 March 2017 will specifically consider issues relating to proposed modifications of Section 12 of the Local Plan (Housing Delivery), including Infrastructure Delivery and Transportation. In addition, approval will be sought for the Local Development Scheme 2017-2020.

EXECUTIVE SUMMARY

The Arun Local Plan was submitted to the Secretary of State for Examination-in-Public on 30 January 2015. The Local Plan sets out a vision for the future of Arun up to 2031. It sets the future planning framework and provides up to date planning policies to be used in the consideration and determination of planning applications. The Plan covers the Arun Local

Planning Authority Area (LPAA), which equates to the Arun District Council administrative area excluding land within the South Downs National Park Authority boundary. Once adopted, the Arun Local Plan will form the statutory development Plan for the LPAA, alongside 'made' Neighbourhood Plans. The Local Plan will supersede all of the 'saved' policies of the 2003 Local Plan.

The Local Plan Examination-in-Public was formally suspended by the Planning Inspector in February 2016 following a Procedural Meeting and initial Hearing sessions. The suspension was granted to enable the Council to undertake further work and produce proposed modifications to the Local Plan in response to a range of observations and concerns identified by the Planning Inspector.

This report presents the proposed modifications that have been produced to the Arun Local Plan (Appendix 1) for approval so that they can be published and representations (comments) be invited accordingly by the Council for consideration by the Inspector. Following the six-week publication period, the modifications, together with representations received and all other supporting documentation produced by the Council, will be submitted to the appointed Planning Inspector in order to enable the Examination-in-Public of the Arun Local Plan to resume.

The modifications proposed constitute both 'minor' grammatical, and non-material changes to the Plan, and 'main' substantive material changes to the contents of the Plan.

The modifications have been informed through the production of a substantial amount of additional evidence by the Council over the previous twelve months, and are supported by a new Sustainability Appraisal and Habitat Regulations Assessment. In addition, the Council has produced a new Infrastructure Delivery Plan and Housing Implementation Strategy which provide detailed explanation as to how housing and infrastructure requirements will be met over the remainder of the Local Plan period. The evidence base which has informed the preparation of the modifications, together with supporting documentation, is available to view on the Examination page of the Arun District Council website.

RECOMMENDATIONS

That the Local Plan Sub-Committee **RECOMMENDS TO THE SPECIAL MEETING OF FULL COUNCIL ON 22 MARCH 2017** that

- 1) the proposed modifications to the Arun Local Plan, which are provided as Appendices 1 and 2 to this report, be approved;
- 2) the Evidence Base reports and Background Document listed are noted;

- Sustainability Appraisal
 - Habitat Regulations Assessment
 - Housing Implementation Strategy
 - Sequential and Exception Test to inform the Main Modifications
 - Equalities Impact Assessment
 - Consultation Statement
 - List of Superseded Policies
 - Employment Background Paper
- 3) the Director of Place, in consultation with the Chairman of the Local Plan Sub Committee and the Cabinet Member for Planning and Infrastructure, be given delegated authority to make any further non-material amendments to the proposed modifications arising from this meeting or as required prior to publication;
 - 4) should recommendation 1 be accepted, the Director of Place be authorised to publish the modified Arun Local Plan.
 - 5) the Director of Place be authorised to prepare a detailed schedule(s) of modifications and necessary documentation for publication and a six-week representation period in accordance with the requirements of the appointed Planning Inspector and relevant procedural guidance;
 - 6) following this 6-week representation period, that the representations to these proposed modifications be submitted to the Planning Inspector as part of his Examination of the Arun Local Plan;
 - 7) the Director of Place be authorised to produce and submit any supplementary information and documentation to the Planning Inspector to assist the Examination-in-Public as required.

1.0 LOCAL PLAN SUB-COMMITTEE MEETINGS

1.1 The Local Plan Sub-Committee meeting on the 6th March 2017 will consider issues relating to proposed modifications of the Local Plan (with the exception of Housing, infrastructure delivery and transportation). It will also consider the following evidence base reports and background documents that support the modifications to the Local Plan;

- Sustainability Appraisal
- Habitat Regulations Assessment
- Housing Implementation Strategy
- Sequential and Exception Test to inform the Main Modifications
- Equalities Impact Assessment
- Consultation Statement
- List of Superseded Policies
- Employment Background Paper

1.2 The Local Plan Sub-Committee meeting on the 9th March 2017 will resume to specifically consider issues relating to proposed modifications of section 12 of the Local Plan (Housing Delivery), including infrastructure delivery and transportation.

2.0 BACKGROUND

- 2.1 The Arun Local Plan was submitted to the Secretary of State for Examination-in-Public on 30 January 2015. The Local Plan sets out a vision for the future of Arun up to 2031. It sets the planning framework and up to date planning policies to be used in the consideration and determination of planning applications. The Local Plan covers the Arun Local Planning Authority Area (LPAA), which equates to the Arun District Council administrative area excluding land within the South Downs National Park Authority boundary.
- 2.2 The Secretary of State has appointed Inspector Jonathan Bore to conduct the Examination following the retirement of the initial Inspector, Roy Foster.
- 2.3 Once adopted, the Arun Local Plan will form the statutory development Plan for the Local Planning Authority Area, alongside 'made' Neighbourhood Plans, superseding the 'saved' policies of the 2003 Local Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The Local Plan will provide up to date planning policies for the District, in accordance with relevant national policy and guidance.
- 2.4 On 28 July 2015 the then appointed Planning Inspector for the Local Plan Examination (Roy Foster) wrote to the Council outlining his interim conclusions following the Procedural Meeting which had taken place on 16 July 2015. This letter (IDED13) provided a range of observations in relation to matters associated with the Local Plan, and identified a range of issues which the Council needed to address in taking forward the Plan. The letter also provided a suggested future way forward for the Council to consider in relation to the Examination-in-Public.
- 2.5 On 10 September 2015 the Council responded to the Inspector agreeing to the suspension of the Plan, and providing an indicative timetable for the suspension period (ADCED07 & ADCED08), which the Inspector subsequently agreed to.
- 2.6 A Hearing session took place on 14 January 2016 to specifically consider the objectively assessed needs for housing (OAHN). On 2 February 2016 Inspector Roy Foster and Inspector Jonathan Bore provided their conclusions on OAHN to the Council (IDED18). They concluded that OAHN was likely to be 845 dwellings per annum. At the same time the Examination was formally suspended in order to enable the Council to undertake the further work required, and to publish main modifications to the Plan accordingly, prior to the resumption of the Examination-in-Public in early 2017.

- 2.7 Following the suspension of the Local Plan Examination-in-Public in February 2016, Officers' have been working to produce modifications to the Local Plan which respond to the various concerns raised by the Planning Inspector. The scope and nature of changes required to the Plan has resulted in the Council undertaking a significant amount of additional technical evidence base work which has informed the proposed modifications to the Plan. Regular progress reports have been provided to the Sub-Committee in relation to progress being made. In addition, a series of regular briefing sessions have been held in order to update all Members on progress.
- 2.8 A number of new evidence base studies have been produced and presented on an ongoing basis to the Local Plan Sub-Committee. These studies have been produced to inform and support the proposed modifications to the Local Plan. The following are the main update studies and reports that have been produced. These are published on the Arun Local Plan Examination website (<http://www.arun.gov.uk/local-plan-examination>):
- Phase 2 Infrastructure Delivery and Phasing Plan (ADCED32)
 - Transport Study Stage 3 Final Report (ADCED33)
 - Local Plan Viability Assessment Update (ADCED34)
 - Housing and Economic Land Availability Assessment
 - Retail Study Update (ADCED31)
 - Strategic Flood Risk Assessment
 - Open Space Study, Playing Pitch Strategy & Indoor Sports Facilities Strategy (ADCED20-ADCED24)
 - Updated Housing Needs Evidence (ADCED26)
 - LEGA Development Delivery Study (ADCED15)
 - Employment Land Needs Update (ADCED14)
 - Strategic Surface Water Management Study (ADCED27)
 - Landscape Study (ADCED28)
- 2.9 In addition, the Sustainability Appraisal (ADCED35) and Habitat Regulations Assessment (ADCED36) which have informed, and accompany the proposed modifications to the Local Plan, are also to be published on the Local Plan Examination page.
- 2.10 The most significant modifications required to the Plan relate to the need for a substantial uplift to the housing requirements for the District. The latest evidence produced by GL Hearn (applying the approach endorsed by the Inspector through existing Hearings and interim conclusions) utilising the 2014 Sub-National Population Projections and associated Housing Projections indicates that OAHN equates to 919 dwellings per annum, or 18,380 dwellings over the Plan period 2011 – 2031. This is significantly higher than the OAHN in the Submitted Local Plan (580 dwellings per annum) or the OAHN figure recommended by the Local Plan Inspector (845 dwellings per annum) in February 2016 following the OAHN Hearing.

2.11 The Council has also considered what contribution the Plan can make towards the unmet housing needs of the Housing Market Area, in accordance with the correspondence received from the Planning Inspector.

3.0 PROPOSED MODIFICATIONS

3.1 Modifications are required to the Plan in order to resolve deficiencies and / or concerns that may otherwise make the plan unsound or not legally compliant. There are two types of modifications: The Main Modifications propose a change to the meaning of a policy or strategy and are proposed as being necessary to address the Inspector's requirements and to enable him to conclude his Examination and find the Local Plan sound. Minor Modifications consist primarily of updating, typographical and gramatical errors which are not considered to materially alter the plan.

3.2 Officers have carefully considered the modifications required to the Plan, taking into account national planning policy requirements and guidance. In addition, a critical friend review of the proposed modifications has been undertaken through the Planning Advisory Service, and advice obtained from other specialist consultants where appropriate. Legal advice has been sought where required to inform the modifications proposed. The key proposed modifications to the Plan are provided as Appendix 1 (in tabular format) and Appendix 2 (as a tracked change version of the Arun Local Plan Submission Document showing all Main and Minor modifications together). The appendices should be read in conjunction with one another in order to provide a comprehensive view of the changes proposed.

3.3 It should be noted that, whilst modifications to the Local Plan are complete, the modifications table is not yet fully completed and it will need to be completed to mirror all of the modifications within the Plan. It is included to show the key changes, how the modifications will appear and how they will be presented to the Inspector.

3.4 The Inspector raised a range of observations, comments and concerns following the first set of examination days, which the Council is seeking to address through the proposed modifications to the Local Plan. The following sections of the report provide a summary overview of the key issues raised by the inspector by topic, and the actions undertaken by the Council to remedy the concerns through further work and proposed modifications to the Local Plan.

3.5 The main changes are highlighted in the following table;

	Chapter	Changes
2.	Overview	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No policies
3.	Spatial Portrait	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No policies
4.	Vision & Objectives	<ul style="list-style-type: none"> • Minor text changes
5.	Key Diagram	<ul style="list-style-type: none"> • Updated diagram
6.	Sustainable Place	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • New Policy SP SD1a
7.	Settlement Structure & Green Infrastructure	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies
8.	Employment & Enterprise	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references resulted in a lot of deleted text • New policy EMP SP1 • Merged economic regeneration policy EMP SP2
9.	Retail	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies
10.	Tourism	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies
11.	Soil, Horticulture & Equine Developments	<ul style="list-style-type: none"> • Mainly minor text changes • No new policies
12.	Housing Delivery	<ul style="list-style-type: none"> • Chapter largely re-written • Updated references • New policies HSP1 and H SP2 • New policies H SP3 – H SP5 relating to site allocations • Revised affordable housing mix H SP2
13.	Design	<ul style="list-style-type: none"> • Removal of a lot of unnecessary text • No new policies
14.	Health, Recreation & Leisure	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies • Updated list of strategic priorities • Updated open space requirements OSR

		DM1
15.	Transport	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies • New reference to Ford Railway Bridge T SP3
16.	Conservation & Heritage	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies
17.	Natural Environment	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies • ENV DM2 includes reference to Pagham Harbour mitigation
18.	Water	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies
19.	Natural Resources	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies
20.	Waste Management	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies
21.	Quality of the Environment	<ul style="list-style-type: none"> • Mainly minor text changes • Updated references • No new policies
22.	Infrastructure	<ul style="list-style-type: none"> • Minor text changes
23.	Monitoring	<ul style="list-style-type: none"> • No change

Housing and Growth Distribution

- 3.6 The Inspector indicated that further work was required to assess the proposed allocations against other reasonable alternative spatial strategies, including further consideration of ecological impacts, accessibility / transport mitigation measures, flooding, drainage, and viability.
- 3.7 The Council has produced a new and up to date Sustainability Appraisal which considers and assesses the spatial strategy against other reasonable alternative spatial strategies. The Council has undertaken extensive 'testing' of a range of spatial options and scenarios in order to inform the revised Strategic Allocations for the Local Plan. An extensive range of new evidence has considered in detail the potential impacts of proposed allocations and identified mitigation measures accordingly, which have been factored into the Infrastructure Delivery Plan and Viability Study.

- 3.8 The Council has proposed substantive modifications to chapter 12 of the Local Plan 'Housing Delivery' to reflect 'testing' of spatial options, Sustainability Appraisal, other evidence, and the substantial increase in OAHN for the District.
- 3.9 Through the proposed modifications, Arun District Council is planning to meet an updated housing requirement. The proposed modifications to the Local Plan respond to the latest evidence, which indicates an OAHN equating to 919 dwellings per annum.
- 3.10 A Housing Implementation Strategy (ADCED37) has been produced which provides explanation and justification in relation to the modified housing requirements and supply of the Local Plan. This includes the use of a phased trajectory to reflect future delivery rates, taking into account constraints and the nature of future housing supply and sites which are proposed for allocation in order to meet the OAHN.
- 3.11 In addition, the Inspector suggested that the Council should give further 'thorough, informed consideration' in relation to the contribution that Arun may or may not be able to make towards unmet needs from elsewhere during the suspension period of the Examination.
- 3.12 Through the suspension period ADC has undertaken a thorough review of the unmet housing needs within the Housing Market Area through ongoing discussions with neighbouring local planning authorities, and through an assessment of the contribution that Arun can make. The Council will agree a Memorandum of Understanding with Chichester District Council, Adur District Council and Worthing Borough Council (and other authorities within the Housing Market Area (HMA), if needed) in order to demonstrate agreement with the approach included within the Local Plan in relation to cross-boundary issues prior to the resumption of the Examination.
- 3.13 The modifications to the Local Plan result in a housing requirement of 20,000 dwellings over the Plan period between 2011 and 2031. The housing supply comprises of:
- Completions (2011-2016) – 3,047 dwellings;
 - Commitments (large sites) - 3,090 dwellings;
 - Commitments (small sites) - 216 dwellings;
 - Neighbourhood Plan Allocations - 491 dwellings;
 - Deliverable HELAA sites - 408 dwellings;
 - Non-Strategic Sites - 1,250 dwellings;
 - Windfall - 922 dwellings; and
 - Strategic Site Allocations - 10,650 dwellings.

- 3.14 Strategic Site Allocations comprise of the following sites:
- Greater Bognor Regis Urban Area – Pagham South, Pagham North and West of Bersted;
 - Greater Littlehampton Urban Area – Littlehampton Urban Area;
 - Inland Arun - Barnham / Eastergate / Westergate (BEW), Fontwell, Yapton, Ford, Climping, Angmering North and Angmering South and East.
- 3.15 This follows extensive testing and assessment of options to significantly boost the housing land supply in the District, taking into account the latest evidence, and discussions with LPAs within the HMA in relation to the consideration of unmet housing needs of the HMA within the Arun Local Plan.
- 3.16 Following extensive testing and assessment of options to boost the housing land supply, and discussions with LPAs within the HMA in relation to the consideration of unmet housing needs of the HMA, the Council proposes modifications to the Local Plan which will result in the provision of a minimum of 1,600 dwellings towards the unmet needs of the Housing Market Area (over and above the OAHN requirement of 18,400 dwellings). This is reflected in the proposed modifications to policies, the Housing Implementation Strategy and in due course will be in the Duty to Cooperate Statement.
- 3.17 The Sustainability Appraisal (2017) has considered how surplus housing supply within the Arun Local Plan can contribute towards the unmet needs of neighbouring local planning authorities.
- 3.18 The evidence of exceptionally strong links between Arun, Chichester and Worthing has resulted in detailed discussions with these authorities about sites that could contribute toward their unmet needs. The next strongest links are with Horsham but they are able to accommodate all of their needs within their recently adopted Local Plan and have confirmed they do not therefore have any unmet needs.
- 3.19 Because of the high levels of out commuting to Chichester from the western areas of Arun District, locations such as Pagham, Bersted, Fontwell and BEW are most likely to contribute to their needs. Conversely, due to the high levels of out commuting to Worthing from the eastern parts of Arun District, locations such as Angmering and West Bank, Littlehampton are most likely to contribute towards their needs.
- 3.20 Based on the capacity of the proposed housing sites within Arun and the anticipated phasing of these developments, it is assumed that some of Arun District Council's neighbours' unmet housing need could be provided for during years 6-10 of the plan period [2021-2026] (i.e. not within the first five years [2016-2021] or the last five years [2026-

2031] of the plan as there is an anticipated shortfall of land supply within Arun during these times).

- 3.21 Each of the neighbouring local planning authorities has confirmed that they are unable to provide housing towards the shortfall that is projected to occur in Arun in the first five years [2016-2021] or the last five years [2026-2031] of the plan period.
- 3.22 Chapter 12 of the modified Local Plan has had the most amendments. New policies H SP1 and H SP2 set out the overall Plan requirements for housing as well as over-arching requirements for all strategic housing allocations to comply with. Policies H SP2a – H S2c then go on to set out detailed requirements that are specific to each allocated site.
- 3.23 Through the preparation of the proposed modifications two potential sites/locations were discounted for inclusion as Strategic Sites. These were Ferring East and Middleton-On-Sea.
- 3.24 The sites have been assessed by consultants as part of the many background evidence studies (including the Landscape Study, the Strategic Flood Risk Assessment and the Sustainability Appraisal). The sites were discounted by the Council through the Sustainability Appraisal process due to significant constraints which could not be satisfactorily mitigated.
- 3.25 The site at Ferring forms part of the gap between Ferring and Goring. Whilst development is spread along the coastline, Ferring retains a degree of separation from both Kingston and Goring-by-Sea due to areas of undeveloped countryside inland to the west and along the coast to the east.
- 3.26 The site at Ferring East was discounted, based primarily on the conclusions of the Landscape Study which includes an assessment of the capacity of the site to accommodate housing development. The study determines the landscape capacity of the site by considering sensitivity and value. Areas with a higher sensitivity and/or value have a lower suitability for development than areas with lower sensitivity and/or value.
- 3.27 The site has been assessed to have substantial landscape sensitivity due to its contribution to the separation between settlements, its contribution to the setting of the surrounding landscape and settlement, and its visual sensitivity. In addition, it also has substantial landscape value due to its local distinctiveness, its contribution to the setting of the coastline and the National Park, along with its recreational value. The site is therefore judged to have negligible/low landscape capacity, making it unsuitable for development.

- 3.28 The site provides a visual connection uninterrupted by development, between the undeveloped coastline and the South Downs National Park, including Highdown Hill, to the north and is open to view from the South Downs National Park, including Highdown Hill to the northwest. It forms a significant break in the view of development along the coastline. It was the only site assessed as having such significant landscape constraints.
- 3.29 The site at Middleton-On-Sea occupies a relatively large area which partially adjoins the northern settlement edge, either side of the B2132. The A259 forms the northern edge of the site. Based on the Landscape Study, the nature of the site means that the majority of it is considered to have either a low or low/medium capacity for development. In addition, the site was also discounted owing to the significant potential impacts on flooding, particularly as a result of climate change. The Strategic Flood Risk Assessment estimated that approximately 71% of the site would be at significant risk of flooding in 2111. The developable area of the site that remained was therefore below the threshold to be considered as a strategic allocation.
- 3.30 The modifications remove the 'Parish and Town Council Housing Allocations' previously included within Policy H SP1. Instead, smaller 'Non-Strategic Sites' of less than 300 dwellings will be identified through Neighbourhood Plans or a Site Allocations Development Plan Document. This follows the report and subsequent resolution of the Sub-Committee on 6 December 2016 (Minute No. 27 refers).

Employment Provision

- 3.31 The Inspector queried whether or not the policies of the Submitted Local Plan provide a sound basis for employment provision up to 2031, and whether or not this is sufficiently aligned with housing provision. He also questioned the deliverability of Enterprise Bognor Regis.
- 3.32 The Council has undertaken further work to consider the implications of the uplift in OAHN, and has amended relevant policies accordingly to ensure that employment provision will be aligned with housing provision, taking into account the aspirations of the Local Plan, and the unmet needs of the wider area.
- 3.33 A report has been prepared in relation to Employment Needs and provision (ADCED43). A number of modifications have been proposed to relevant policies in the Employment and Enterprise Chapter of the plan in order to provide up to date and sound policies in relation to future employment provision.
- 3.34 The most significant modification to the chapter is insertion of a new policy EMP SP2: Economic Growth Areas which amalgamates the content of previous policies EMP DM 3: Littlehampton Harbour and

EMP DM4: Knowledge and Cultural Based Economic Growth and Regeneration.

Relationship between the Arun Local Plan and 'made' Neighbourhood Plans

- 3.35 The Inspector raised some potential inconsistencies between the emerging Arun Local Plan and 'made' or emerging Neighbourhood Plans. The Council has given consideration to the potential inconsistencies highlighted and amended policies accordingly. It will be necessary to produced, for clarity, a list of policies that are contained in made Neighbourhood Plans that will be superseded by the Arun Local Plan, when it is adopted.

Littlehampton Economic Growth Area

- 3.36 The Inspector suggested that references to the Littlehampton Economic Growth Area are unclear and confusing, and that further consideration is required in relation to soundness and deliverability of a housing allocation in this location. Specifically, he made reference to the representations from the Environment Agency, where they considered there was insufficient justification provided to outweigh the flood risk associated with the location, against other alternatives.
- 3.37 The Council has produced a comprehensive study (ADCED15) which considers in further detail the delivery of the proposed allocation, responding to the concerns raised by the Inspector. The Council has also produced supporting statements to set out how the sequential and exception tests have been applied so that flooding has been considered in accordance with the National Planning Policy Framework (ADCED39). A number of substantive changes have been proposed to the Local Plan to reflect the concerns raised.
- 3.38 The Council has proposed a number of modifications to provide a clear policy framework to enable the regeneration of the Littlehampton Economic Growth Area and the delivery of the West Bank housing allocation. A new policy EMP SP2 has been introduced into section 8 'Employment and Enterprise' in order to provide a clear policy framework for the Economic Growth Areas (EGAs) at both Littlehampton and Bognor Regis. The proposed Strategic Housing Allocation for Littlehampton - West Bank, is included within Policy H SP4 of section 12 'Housing Delivery'. This allocation sits within the wider LEGA boundary, as indicated on the modified Policies Map.

Presentation

- 3.39 The Inspector indicated that the Local Plan is too long, and the content and presentation is sometimes confusing. Whilst acknowledging that written style and length are not matters of soundness, and that major pruning would not be appropriate given the stage of the Plan, he did

indicate that a more comprehensible and user-friendly plan would help to simplify the Examination process.

3.40 In proposing modifications to the Plan, the Council has been mindful of the views expressed by the Inspector and other participants, and has sought to make appropriate amendments accordingly. The length of the Plan has been reduced, and text which is not considered necessary to explain policies has been removed. However, for the reasons cited by the Inspector, it was not considered possible or appropriate at this stage in the process to comprehensively change the layout, structure or presentation of the Plan.

3.41 Changes of particular note to the structure of sections within the Plan include:

- A new policy (SD SP1a) has been introduced into section 6 'Sustainable Development' in order to provide a strategic policy which governs the broad spatial approach to the location of new development, infrastructure, retail and facilities in the District up to 2031, leading directly from the vision and objectives of the Plan;
- Modifications have been made to the structure of Section 8 'Employment & Enterprise'. Policy EMP SP1 has been renamed as 'Strategic Economic Growth' so that the policy provides the overall strategy for economic growth, before the insertion of a new policy EMP SP2 'Economic Growth Areas' which provides the policy framework for the Littlehampton Economic Growth Area and the Bognor Regis Economic Growth Area; and
- The most significant modifications have been made to Section 12 'Housing Delivery'. The modifications proposed to this section of the Plan are extensive as a result of the need to respond to the significant uplift in OAHN since the Submission Local Plan was produced, and therefore the introduction of several new Strategic Allocations. Policy H SP1 has been rewritten, and now provides details of the housing requirements for the Plan period. A new policy (H SP2) has been introduced which provides key requirements for all of the Strategic Site Allocations to meet. The policy is supplemented by new policies covering the Strategic Allocations across the District as follows:
 - Policy H SP2a – Greater Bognor Regis Urban Area
 - Policy H SP2b – Greater Littlehampton Urban Area
 - Policy H SP2c – Inland Arun.

Policies Map

- 3.39 The Policies map has been updated to reflect the modifications to the plan. The map attached as Appendix 3 identifies the changes proposed to the Policies Map.

OTHER EVIDENCE BASE STUDIES & BACKGROUND DOCUMENTS

Sustainability Appraisal and Habitat Regulations Assessment

- 3.42 The Inspector indicated that the Sustainability Appraisal accompanying the Submission Local Plan was overly complex and did not provide an adequately clear audit trail of reasons for the choices made. To inform and support the proposed modifications to the Plan, the Council has produced a new Sustainability Appraisal (ADCED35), starting with a new Scoping Report in June 2016 which was consulted upon. The new SA now provides a clear and concise appraisal of the Local Plan. It has also informed the consideration of the contribution that the Arun Local Plan can make to the unmet needs of the wider Housing Market Area.

- 3.43 The Habitat Regulations Assessment (ADCED36) presents an overall assessment of the proposed modifications to the Local Plan, including measures which have been specifically incorporated into the policies to prevent adverse impacts on European sites. The report concludes that the proposed modifications can be considered compliant with the Habitat Regulations with regards to Arun Valley SPA/Ramsar, Pagham Harbour SPA/Ramsar and Solent and Dorset Coast SPA.

Housing Implementation Strategy

- 3.44 This is referred to in paragraph 3.9 above and is published in full on the examination page of the website.

List of Superseded Policies

- 3.45 This is referred to in paragraph 3.44 above and is published in full on the examination page of the website.

Sequential and Exception Test

- 3.46 The inclusion of additional sites to meet the increased housing target required additional work on strategic flood risk. A Sequential and Exception Test has been prepared and is published in full on the examination page of the website.

Equalities Impact Assessment

- 3.47 Equalities Impact Assessments (EqIA) are a legal requirement under a number of acts including the Race Relations [Amendment] Act 2000 and are also recognised as good practice nationally. Planning policies do not affect everyone in the same way and EqIA enable the potential and actual effects of policies to be examined, for improvements or changes to be introduced, to ensure fairness and encourage diversity. ADC has updated the EqIA that was submitted alongside the Local Plan.

Consultation Statement

- 3.48 A consultation Statement is an ongoing document that logs the consultation that has been undertaken during the preparation of a planning document and how the results of consultation have been taken into account. The Consultation Statement that was submitted alongside the Local Plan *has been update to reflect what has happened to date. Following the consultation on the Main Modifications an updated Consultation Statement will be sent to the Inspector. This document is published in full on the examination page of the website.*

Employment Background Paper

- 3.49 An Employment Background Paper draws together the existing evidence and the outputs of further work into a short together so that it establishes a clear narrative in terms of the Council's economic evidence, and the evolution and rationale of the respective Local Plan policies.

4.0 ENGAGEMENT

- 4.1 The Council has liaised closely with relevant stakeholders and statutory consultees in the process of addressing the concerns raised by the Inspector and producing the proposed modifications to the Plan.
- 4.2 A number of meetings have been held with neighbouring Local Planning Authorities in order to consider the cross-boundary implications of the proposed modifications to the Plan. Further details are provided in the Duty to Cooperate Statement.
- 4.3 Regular and ongoing engagement and dialogue has been held with promoters / developers of proposed Strategic Site Allocations in order to inform the preparation of the modifications, including the Infrastructure Delivery Plan, Viability Study and Housing Implementation Strategy. This has included meetings to specifically consult with the development industry in relation to the assumptions being utilised within the Viability Study, the proposed approach to

meeting OAHN and the use of a phased housing trajectory over the Plan period, including the Housing Implementation Strategy. The Council is in the process of agreeing Statements of Common Ground with relevant site promoters / developers in order to demonstrate the deliverability of the sites proposed for allocation within the Plan.

- 4.4 The Council has liaised closely with the Environment Agency on flooding issues in order to address concerns raised previously in relation to the Littlehampton Economic Growth Area and the need to demonstrate compliance with the National Planning Policy Framework and the Sequential / Exception tests. A Memorandum of Understanding will be prepared between the Council and the Environment Agency. Meetings have also been held with Natural England to further consider and agree the future approach to the mitigation of Pagham Harbour.
- 4.5 Regular updates have been provided to all Parish and Town Councils in relation to progress.
- 4.6 The Council has worked extensively with West Sussex County Council, Highways England, Southern Water, NHS Coastal West Sussex Clinical Commissioning Group and other infrastructure providers in order to produce a comprehensive Transport Study and Infrastructure Delivery Plan.

5.0 PUBLICATION OF THE PROPOSED MODIFICATIONS

- 5.1 The Examination process allows for a suspension to address significant issues raised by an Inspector through additional work. The Examination into the Local Plan was deferred and the Council is now proposing modifications to meet the soundness issues that were raised in accordance with the agreed timetable.
- 5.2 The Council is required to publish these proposed Modifications to address soundness and comments will be invited accordingly. The Inspector will not consider comments received on any other aspect of the Local Plan because they already form part of his ongoing examination of the plan. These were made both at the submission stage and in the evidence put before him in person and in writing at the Examination Hearings.
- 5.3 Officers will liaise with the appointed Planning Inspector in order to confirm the scope of the main modifications and the most appropriate format for publishing the proposed modifications, taking into account the procedural guidance available.
- 5.4 The key proposed modifications to the Submission Arun Local Plan are provided in tabular format as Appendix 1. Appendix 2 provides an updated tracked change version of the Plan showing all main and minor modifications for ease of understanding. Both appendices should be read in combination, taking note of those that are main

modifications for soundness, in order to provide a comprehensive view of all of the modifications proposed.

6.0 IMPLICATIONS OF THE HOUSING WHITE PAPER

- 6.1 The Government published the Housing White Paper '*Fixing Our Broken Housing Market*' on 7th February 2017. This sets out a broad range of reforms that Government plans to introduce to help reform the housing market and increase the supply of new homes. The White Paper includes proposals which may, in time, impact upon the production of Local Plans. However, in many cases the Government has committed to consulting on proposals prior to implementing specific changes to National Planning Policy or Regulations. The proposals in the Housing White Paper are not considered to materially impact upon the proposed modifications to the Local Plan at the current time.
- 6.2 A further report will be provided to the Sub-Committee in due course providing further details in relation to the proposals, identifying potential implications for the Council to consider.

7.0 NEXT STEPS

- 7.1 If the recommendations set out in this report are agreed by the Council, the next steps will be to publish the proposed Modifications to the Arun Local Plan for a period of 6 weeks so that representations about them can be made to the Inspector. This representation period will provide stakeholders and the general public with the opportunity to set out their response as regards the changes to the Local Plan proposed in this report. The precise format and presentation of the modifications will be agreed with the Inspector prior to formal publication.
- 7.2 Any representations submitted to the Council will be sent in full to the Inspector, along with a summary, for his consideration. The representations, together with documentation submitted by the Council, will be made available by the Council on the Examination page of the website in due course.
- 7.3 The Inspector will consider representations on the Main Modifications only and will confirm arrangements for further Examination Hearing sessions as required. In due course he will then complete his report and submit it to the Council. The Inspector's final report will be brought to a meeting of the Council, outlining any further changes to the Arun Local Plan required by the Inspector in order to make it sound, so that the amended plan may be formally adopted by the Council.
- 7.4 A separate report is being provided to the Sub-Committee in relation to the future timetable for the Local Plan, as set out within the Local Development Scheme.

Appendices: Please note these will be circulated under separate cover to the agenda and will be uploaded to the Committees web page as additional papers

Appendix 1 - Table of key proposed modifications to the Arun Local Plan 2011-2031 - Publication Version October 2014

Appendix 2 – Tracked change version of the Arun Local Plan Submission Document showing Main and Minor Modifications March 2017

Appendix 3 – Policy Changes Map March 2017

Background Documents:

Arun Local Plan Examination page and evidence base (<http://www.arun.gov.uk/local-plan-examination>)

Consultation Statement ADCED41

Employment Land Needs Update (ADCED14)

Employment Report ADCED43

Equalities Impact Assessment ADCED40

Habitat Regulations Assessment ADCED36

Housing and Economic Land Availability Assessment

Housing Implementation Strategy ADCED37

Housing White Paper '*Fixing Our Broken Housing Market*' (February 2017)

Landscape Study (ADCED28)

LEGA Development Delivery Study (ADCED15)

List of Superseded Policies ADCED42

Local Development Scheme ADCED44

Local Plan Viability Assessment Update (ADCED34)

National Planning Policy Framework (DCLG, 2012)

Open Space Study, Playing Pitch Strategy & Indoor Sports Facilities Strategy (ADCED20-ADCED24)

Phase 2 Infrastructure Delivery and Phasing Plan (ADCED32)

Planning and Compulsory Purchase Act (2004)

Planning Practice Guidance (DCLG, 2017)

Procedural Practice in the Examination of Local Plans (Planning Inspectorate, 2016)

Retail Study Update (ADCED31)

Sequential and Exception Test to inform the Main Modifications ADCED39

Strategic Flood Risk Assessment

Strategic Surface Water Management Study (ADCED27)

Sustainability Appraisal ADCED35

Transport Study Stage 3 Final Report (ADCED33)

Updated Housing Needs Evidence (ADCED26)

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ARUN DISTRICT COUNCIL

LOCAL PLAN SUBCOMMITTEE – 9 MARCH 2017

Subject : Local Development Scheme
Report by : Martyn White – Principal Conservation Officer
Report date : February 2017

EXECUTIVE SUMMARY

The report provides an updated Local Development Scheme for approval (appendix 1). It has been amended following a change in the timetable for the production of the Arun Local Plan.

RECOMMENDATION

The Subcommittee RECOMMENDS TO FULL COUNCIL:

That the Local Development Scheme 2017-2020 be approved.

1.0 BACKGROUND

- 1.1 The Local Development Scheme (LDS) sets out the timetable for the production of the emerging Local Plan. The current version was presented to the Local Plan Sub-Committee on 27th March 2014.
- 1.2 The Local Development Scheme (LDS) identifies which Local Development Documents (LDDs) the Council intends to produce during a rolling three year period. The Local Development Scheme (LDS) is in effect a work programme for the Local Plan process. The dates set out in the timetable are monitored each year from 1st April to 31st March through the Authority Monitoring Report.
- 1.3 Whilst the initial key milestone of publishing the draft Local Plan have been met, the suspension period introduced to the local plan process has necessitated that the LDS be revised. Changes to the LDS reflect the delay in seeing the Local Plan adopted and a review into the other documents that the council will prepare. The production of an updated LDS will be helpful to the Inspector for the Local Plan Examination.
- 1.4 The revised LDS (attached as appendix 1) includes a timetable for the preparation of the Local Plan, Gypsy and Traveller and Travelling

Showpeople Site Allocations Development Plan Document and a Small Sites Development Plan Document.

- 1.5 It is intended that the LDS will come into effect following the Full Council meeting on the 22nd March 2017.

- 2.0 CONCLUSION

- 2.1 Once this LDS has been approved by Full Council, it will be published on the Council's website. This will provide the most up to date timetable for the preparation of the Local Plan and accompanying Local Development Documents.

Appendix 1

Local Development Scheme 2017-2020

Contact: Martyn White
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ARUN DISTRICT COUNCIL
LOCAL DEVELOPMENT SCHEME
2017 – 2020



ARUN DISTRICT COUNCIL

LOCAL DEVELOPMENT SCHEME

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1. Introduction

- 1.1 This is the Local Development Scheme (LDS) for the period 2017-2020. The scheme has been prepared in conformity with the Planning and Compulsory Purchase Act 2004, as amended by section 111 of the Localism Act 2011. The local planning authority must resolve that the scheme is to have effect and specify the date from which it will do so.
- 1.2 The LDS sets out the current Development Plan and introduces the scope and timeframe for preparing the emerging local Development Plan Documents (DPDs), which will form the Development Plan.

Recent Changes to the Planning System

- 1.3 The Local Plan must be prepared in accordance with the National Planning Policy Framework (NPPF). The NPPF must also be read alongside Planning Policy for Traveller Sites which was published in March 2012 and the Planning Practice Guidance, published in March 2014.
- 1.4 The Local Plan, submitted for examination in January 2015, is currently in a period of suspension as the Council makes Main Modifications to the Plan and existing evidence base. Currently being prepared, the Local Plan covers the whole of Arun District except the area covered by the South Downs National Park Authority (SDNPA) which is the statutory planning authority for the National Park area and they are preparing their own Plan.
- 1.5 The Localism Act 2011 allows for communities to draw up Neighbourhood Development Plans. In Arun's Local Planning Authority Area, there are currently (as of February 2017) 17 Neighbourhood Development Plans (NDPs) being produced in accordance with the Neighbourhood Planning (General) Regulations 2012. Of this number, 14 have been formally adopted ('made') by Arun District Council. Walberton NDP will be taken to Full Council to be made in March 2017. Once NDPs are adopted ('made'), they will sit beside the Arun Local Plan and become part of the statutory Development Plan which guides decision making in the district.
- 1.6 The Community Infrastructure Levy (CIL) Regulations came into force in 2010. The council is currently working towards preparing a CIL charging schedule which will set a tariff upon development taking place in the district.

2. Arun District Council's Development Plan

2.1 All planning applications in Arun District Council must be considered against the Development Plan which currently consists of the following adopted plans:

- Arun District Local Plan – saved policies (2003)
- West Sussex Minerals Local Plan – saved policies (2003)
- West Sussex Waste Local Plan (2014)
- Made Neighbourhood Development Plans:
 - Aldingbourne
 - Angmering
 - Arundel
 - Barnham & Eastergate
 - Bersted
 - Bognor Regis
 - Climping
 - East Preston
 - Felpham
 - Ferring
 - Kingston
 - Littlehampton
 - Rustington
 - Yapton

Arun Local Plan 2003

2.2 The Arun Local Plan was adopted in 2003. Subsequently, the 2004 Act introduced changes to the plan-making process which meant that the Local Plan system would be replaced by the LDF. The Act contained a provision for policies in adopted or approved local and structure plans to be saved for three years from the commencement date of the Act, which was 28th September 2004.

2.3 Arun District Council (ADC) applied to the Secretary of State to save a number of policies from its Local Plan (2003) beyond this three year period based on criteria set out in Planning Policy Statement 12 (PPS12). **Appendix 1** lists all of the Local Plan policies which were deleted from the Arun Local Plan and states the reason for deletion. The saved policies can be found on the Arun District Council website <http://www.arun.gov.uk/2003-local-plan>.

2.4 A schedule of alterations and deletions were prepared as part of the supporting documents for the Local Plan Examination in Public (EiP). It identified each of the Local Plan 2003 saved policies and existing SPD and indicates whether they have been deleted or replaced by the new Local Plan policies.

West Sussex Minerals Local Plan 2003

- 2.5 The West Sussex Minerals Local Plan (MLP), which was adopted in May 2003, ensures the supply of minerals to at least 2006 although the policy framework has a longer timeframe. It sets out the County Council's vision, objectives and strategy for mineral land-use planning in West Sussex, and provides the detailed policy framework for determining mineral planning applications. It also sets out the existing sites and commitments and new site allocations for minerals development. The MLP is a material consideration in the determination of planning applications and part of the statutory development plan for West Sussex.
- 2.6 The MLP in its entirety was saved until 27 September 2007. The County Council submitted to the Government a list of the policies that it considered should be saved and why. The outcome of this request was that the majority of the policies in the MLP have been saved until they are replaced by the Minerals and Waste Core Strategy DPD. Further details regarding the saved Minerals Local Plan saved policies can be found on the West Sussex County Council website: www.westsussex.gov.uk/mwdf.
- 2.7 Work on updating the Minerals Local Plan 2003 is currently underway; therefore, any changes and updates to the Minerals Local Plan will need to be monitored to ensure that the Arun Local Plan is updated accordingly.

The West Sussex Waste Local Plan

- 2.8 The West Sussex Waste Local Plan (WLP) (2014) was adopted on 11th April 2014. It sets the vision, objective and strategy for waste planning in West Sussex until 2031. It includes Use-Specific Policies, Development Management Policies and Waste Site Allocation policies. The allocation policies aim to ensure there is sufficient capacity to meet identified shortfalls in transfer, recycling and recovery capacity across the county. The WLP includes two strategic sites within Arun District at Hobbs Barn, near Climping and Site north of Wastewater Treatment Works, Ford. These will be included on the Arun Local Plan Policies Maps.

Neighbourhood Development Plans

- 2.9 There are 14 Neighbourhood Development Plans within the Arun District that have been adopted. These give communities the power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They include the location of new homes, shops and offices. They influence what those new buildings should look like and inform what infrastructure should be provided.

3. Emerging Plans

The Local Plan

- 3.1 The council is currently preparing the Arun Local Plan which sets out the vision for the future of Arun and guides development to achieve that vision. Arun's Local Plan covers the Arun Local Planning Authority Area (LPA) - This area is Arun District apart from those parts within the South Downs National Park (SDNP). The SDNP Authority is preparing a Local Plan for the entire park. The ALP will be part of the Development Plan for the area, together with the adopted Waste Local Plan and the Minerals Local Plan, both a West Sussex County Council responsibility, together with Neighbourhood Plans, prepared by local communities. The ALP sets out the strategic vision, objectives, policies and proposals for development in the LPA to 2031 and beyond. The ALP sets out what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered.
- 3.2 The following key milestones have been achieved:
- **Regulation 18 Consultation (preparation of a Local Plan):**
July – September 2012
 - **Regulation 19 Consultation (publication of a Local Plan):**
October 2014
 - **Regulation 22 (submission to the Secretary of State):**
January 2015
 - **Enquiry:**
 - **First Hearing Sessions:** June 2015
 - **Procedural Meeting & Inspectors Conclusions:** July 2015
 - **Inspector's Response to the Council's Proposed Suspension Timetable:** September 2015
 - **OAN Meeting:** January 2016
 - **Inspectors OAN Conclusions:** February 2016
 - **Suspension of the Arun Local Plan:** February 2016
- 3.3 Since suspension of the Arun Local Plan, the Council has been conducting various studies to update the Plan's existing evidence base and inform Main Modifications.
- 3.4 This LDS (2017-2020) provides the timetable for the Arun Local Plan. Future key milestones are planned as follows:
- **Approval of Main Modifications:** March 2017
 - **Main Modifications Consultation:** (6 week period)
 - **Resume Examination:** Summer 2017
 - **Receive Inspectors Report:** Autumn 2017
 - **Adoption:** Winter 2017
- 3.5 A profile of the Local Plan, providing details such as the document's role, status and production arrangements is set out in **Appendix 2**.

Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document

- 3.6 The LDS 2014-2017 explains that the Local Plan will include site allocations, development management policies and Gypsy and Traveller policies. However, the Local Plan provides an overview of the status of the evidence base including the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment and Sites Study. It explains that it was considered appropriate and in accordance with national planning guidance that ADC would work with the coastal West Sussex authorities (Worthing Borough and Adur District and Chichester District), the South Downs National Park Authority and West Sussex County Council to develop a joint evidence base.
- 3.7 At the time of preparing the joint evidence base, it was identified that the results of this work would not fit with the preparation timetable for the Local Plan. Therefore, the Draft Local Plan states that the Council proposes to prepare a separate DPD for traveller accommodation. This remains the case as further work is required to complete the jointly commissioned GTAA as well as undertake further local evidence gathering as part of a site assessment exercise.
- 3.8 It is important however, that the Gypsy and Traveller and Travelling Showpeople Sites Allocation DPD is prepared alongside, or closely following the Local Plan DPD to ensure that it meets the requirements of the Planning for Traveller Sites Policy (March 2013). Further details regarding the timetable for the preparation of this DPD is provided in **Appendix 2**.

Small Site Allocations Development Plan Document

- 3.9 The Council and Neighborhood Planning Groups will use the Housing & Economic Land Availability Assessment (HELAA) as evidence to identify small sites to be allocated through Neighbourhood Plans and/or a Small Sites Allocations DPD. This will give the Council more control over allocating small sites within the Plan period.
- 3.10 The Council will review the need to produce a Small Site Allocations DPD on an annual basis having regard to monitoring data in relation to housing land supply, housing delivery and progress with Neighbourhood Plan production. If monitoring indicates that insufficient residential sites are being delivered through a suitable supply within emerging / made Neighbourhood Plans to meet the requirement for Non-Strategic Sites across the District in a timely fashion, the Council will commence the production of a Small Site Allocations DPD in order to allocate sufficient sites to meet any identified shortfall, in accordance with the Local Plan housing trajectory.

CIL Charging Schedule

- 3.11 The Local Plan will need to show what infrastructure is needed within the District over the lifetime of the Plan, when it will be provided and how much it will cost. This is set out within the Infrastructure Delivery Plan (IDP)
- 3.12 The Community Infrastructure Levy (CIL) Regulations were introduced in April 2010 and allow charging authorities to set a charge on development in order to fund the infrastructure identified through the IDP. To ensure that the charging schedule is based upon the infrastructure requirements identified within the adopted Local Plan, preparation of the CIL charging schedule will follow the Local Plan. However, it should be noted that the CIL charging schedule, once adopted, will not form part of the development plan. Furthermore, a timetable for the preparation of the CIL charging schedule is yet to be agreed by the Council's CIL sub-committee. Once a timetable has been agreed, it will be published on the ADC website.

4. Supporting Documents

Open Space, Playing Pitch & Built Sport Facilities Supplementary Planning Document

- 4.1 This Supplementary Planning Document (SPD) will build on methodology set out in the recently conducted Open Space Study, playing Pitch Strategy and Indoor Sport and Leisure Facilities Strategy. The SPD will set out a clear process for determining onsite and offsite contributions from future development.

Littlehampton Economic Growth Area (LEGA)

- 4.2 A SPD for the proposed Local Plan LEGA policy will be prepared with the aim to regenerate the area. Part of this document will provide overall planning and development guidance for the Littlehampton – West Bank Strategic Housing Site and consider how that development will contribute to the rejuvenation of LEGA.

The Arun Design Guide

- 4.3 The Arun Design Guide will build upon policies within the Local Plan and act as a SPD. It is expected to cover the principles of:
- urban design;
 - creating distinctive local places;
 - inclusivity/adaptability;
 - crime prevention;
 - climate mitigation/adaption and flood defences;

- healthy communities; and
 - explain the tools and processes to achieve good design.
- 4.4 Reflecting the local situation in the Planning Authority area of Arun District it will be based on nationally recognised design policy, criteria and standards. It will also be prepared to ensure that it is simple to use and understand and will include the Building for Life scoring system or any other relevant system. Where possible information will be provided in the Development Management Local List to ensure that information is up to date and relevant.
- 4.5 The Arun Design Guide will be broadly divided into the following sections:
- Assessment, appraisal
 - Design at Neighbourhood level
 - Design at Street level
 - Design of plots, blocks and buildings
 - Technical standards
 - Appendices
- 4.6 Work on the Design Guide will commence following the adoption of the Local Plan.

Sustainability Appraisal

- 4.7 The sustainability appraisal is an appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to ensure that policies are prepared in line with the principles of sustainable development. Since 2001, Sustainability Appraisals have been required to ensure that plans and policies are in conformity with the Strategic Environmental Assessment EU directive. The Local Plan and accompanying Development Plan Documents and Area Action Plan must be subject to Sustainability Appraisal and as such, this process will be factored into the project plan for the preparation of each policy document.
- 4.8 To date, work began in 2005 on a scoping report and undertaking work on a sustainability appraisal of the Issues and Options Core Strategy (March 2005) and the Draft Preferred Options Core Strategy (September 2007). In 2008 the Council commissioned consultants EDAW, who produced a District Baseline Report and a new Scoping Report containing a more detailed Framework. This was consulted on with the statutory agencies and then a Sustainability Commentary (March, 2009) published alongside the Options for Growth document. Broad Sustainability reports were also done for the Housing and Employment Growth consultations (2011). Production of the Core Strategy and its accompanying documents were then put on hold until 2012.

- 4.9 In 2012 work began on the production of the Arun Local Plan 2011-2031. Alongside this, work recommenced on the sustainability appraisal. An Interim Sustainability Appraisal was produced appraising the draft policies of the Draft Local Plan (2013-2028). In Spring 2013 an Intended Full SA Report then appraised the content of the consultation draft Local Plan. Following another pause to agree the Housing Strategy, a SA Report was published alongside the Regulation 19 (proposed submission) Local Plan 2011-2031. A review of the SA began in June 2016 with consultation on the SA Scoping Report undertaken in July 2016 and a new SA of the Main Modifications published in February 2017.

Habitats Regulation Assessment

- 4.10 The Habitats Regulations Assessment (HRA) must be applied to all Local Development Documents (LDD) in England and Wales. HRA aims to assess the potential effects of a land use plan against the conservation objectives of any sites designated for their nature conservation importance (Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites) as part of a system known collectively as the Natura 2000 network of European sites. The HRA guidance (DCLG, 2006) suggests three stages to the Assessment process:

- Identification of likely significant effects (screening);
- appropriate assessment and ascertaining the effect on integrity
- mitigation measures and alternative solutions

- 4.11 In 2007 the Core Strategy Preferred Options was screened for likely significant effects. This exercise was followed by an Appropriate Assessment of Arun's Growth Options in 2008 (finalised in 2010). An Appropriate Assessment of the Core Strategy Proposed Submission was completed in April 2010. A HRA for the Arun District Local Plan was prepared in March 2013 of the allocations and broad location suggested of the Summer 2013 version of the Local Plan. During the suspension period of the Local Plan Examination in Public, further work has reassessed all locations being proposed for inclusion in the Main Modifications. This included a Stage 1 Report: Baseline Data for Site Evaluations in April 2016; a Stage 2 Report: Screening for Likely Significant Effect in June 2016 and an Appropriate Assessment of the Main Modifications in February 2017.

Equalities Impact Assessment

- 4.12 Equalities Impact Assessments (EqIA) are a legal requirement under a number of acts including the Race Relations [Amendment] Act 2000 and are also recognised as good practice nationally. Planning policies do not affect everyone in the same way and EqIA enable the potential and actual effects of policies to be examined, for improvements or changes to be introduced, to ensure fairness and encourage diversity.

ADC has updated the EqIA that was submitted alongside the Local Plan.

Section 17 Assessment

- 4.13 Section 17 of the Crime and Disorder Act 1998, as amended by the Police and Justice Act (2006), requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation. A Section 17 Assessment was undertaken, in consultation with the Safer Arun Partnership, as part of the preparation of the Local Plan preparation process to ensure that it meets the requirement of the 2006 Act. This has been updated to consider the impact of the Main Modifications.

Statement of Community Involvement

- 4.13 The first Statement of Community Involvement (SCI) was adopted in July 2006 and was subsequently revised in March 2009 as a result of the 2008 amendments to the 2004 Act. The most recent SCI was adopted by the Council on 20th June 2012. All forthcoming consultations must be carried out in accordance with the most up to date SCI.

Evidence Base Reports

- 4.14 The preparation of a sound Local Plan and supporting DPDs will rely upon a robust and credible evidence base. The table in **Appendix 3** lists the key background studies to inform the preparation of plans that have been undertaken to date.

5. Process and Procedures

Resources

- 5.1 The Planning Policy and Conservation Team are leading the production of the Local Plan and supporting DPDs and the CIL charging schedule. It may be necessary at particular times to employ consultants, where time constraints require it, or to produce work for which specialist expertise is required. It may also be necessary at particular times to draw in staff from other parts of the council to help with particular pieces of work.
- 5.2 A project management approach is being employed in the preparation

of the documents listed above to ensure that the timescales set out in this document are met. This will enable the continual review of all of the risks associated with delivery and the effective management of resources. A risk assessment is provided in **Appendix 4**.

Monitoring and Review

- 5.3 The Localism Act removed the requirement for Local Planning Authorities to submit Annual Monitoring Reports to the Secretary of State. Instead authorities are now required to prepare an Authorities Monitoring Report and make this available to the public. This report monitors details such as the progress of the preparation and implementation of the Local Plan and supplementary planning documents (all data to be included within the authorities monitoring report is set out in Regulation 34 of the Town and Country Planning, (Local Planning) (England) Regulations 2012. Arun District Council's most up to date monitoring report can also be accessed on the ADC website using the following link:

<http://www.arun.gov.uk/authority-monitoring-report>

APPENDIX 1 – Local Plan 2003 Deleted Policies

ADLP Policy Number	ADLP Policy Title	Reason for deletion
GEN1	Sustainability	Deleted from the Local Plan. The policy does not add to national or regional policy. Principle of this policy will be repeated through the Core Strategy Policy and further amplified through Development Control Policies.
GEN16	Public Rights of Way	Deleted from the Local Plan. This policy repeats guidance elsewhere; it is the job of the County Council to protect Rights of way. Also it reads more like a statement of fact
GEN17	Access for People with Disabilities	Deleted from the Local Plan (repeats other legislation)
GEN27	Landscape Diversity	Deleted from the Local Plan. This policy is covered by guidance elsewhere
GEN30	Protection of Species	Deleted from the Local Plan. This policy is covered by guidance elsewhere
GEN31	Contaminated Land	Deleted from the Local Plan. The information in this policy is covered in PPS23.
AREA4	Historic Parks and Gardens	Deleted from the Local Plan. This replicates policies contained in PPG15.
AREA12	Agricultural Land Quality	Deleted from the Local Plan. The information in this policy replicated that contained in PPS 7
AREA22	Loss of residential Units	Deleted from the Local Plan. This replicates policies contained elsewhere.
DEV4	Golf Courses	Deleted from the Local Plan. This replicates policies contained elsewhere.

ADLP Policy Number	ADLP Policy Title	Reason for deletion
DEV7	Agricultural Workers' Dwellings	Deleted from the Local Plan. This replicates policies contained elsewhere.
DEV9	Demolition of Listed Buildings	Deleted from the Local Plan. This replicates policies contained in PPG 15
DEV10	Alterations and Extensions to Listed Buildings	Deleted from the Local Plan. This replicates policies contained in PPG 15
DEV11	Setting of Listed Buildings	Deleted from the Local Plan. This replicates policies contained in PPG 15
DEV12	Protection and Reinstatement of Original Features in Listed Buildings	Deleted from the Local Plan. This replicates policies contained in PPG 15
DEV13	Changes of Use of Listed Buildings	Deleted from the Local Plan. This replicates policies contained in PPG 15
DEV16	Roadside Facilities	Deleted from the Local Plan
DEV20	Rest and Nursing Homes	Deleted from the Local Plan. This policy is covered by other guidance
DEV23	Conversions of Existing Buildings to Form a Number of Residential Units	Deleted from the Local Plan. This policy is covered by other guidance
DEV24	Gypsy Sites	Deleted from the Local Plan. This is replaced by circular 01/2006 "Planning for Gypsy and Traveller Caravan Sites".
DEV28	Retail Provision for Large Residential Development	Deleted from the Local Plan. This policy is no longer required.
DEV29	Amusement Centres	Deleted from the Local Plan. This policy is no longer required. The Council has lost a number of planning appeals based on this policy. It is no longer implemented.
DEV38	New Touring Caravan and Camping Sites	Deleted from the Local Plan. This policy is

ADLP Policy Number	ADLP Policy Title	Reason for deletion
		covered by many other PPG/PPS's
DEV40	Caravan and Camping Sites and Flood Risk	Deleted from the Local Plan. This Policy relates to Caravan and Camping sites in respect of Flood Risk. Flood Risk Policies can be found in PPS25
Policy SITE4	Roundstone, Angmering	Deleted from the Local Plan, the site is nearing completion

APPENDIX 2 – Development Plan Document (DPD) Profiles

ARUN LOCAL PLAN AND POLICIES MAPS		
<p>The Arun Local Plan will set out the long term spatial vision and strategy for the District up to 2031 and beyond.</p> <p>The Local Plan will set out strategic development. It will include policies to deliver the Council's spatial strategy and will be accompanied by a delivery plan to show what infrastructure is needed to accompany strategic development together with means for monitoring the plan.</p>		
Geographical Area	Arun District but excluding that part of the District within the South Downs National Park Boundary	
Subject to Independent Examination	Yes	
Produced jointly with other authorities?	A joint plan was considered but has not been produced, although related background evidence has been produced jointly with West Sussex County Council and neighbouring District and Borough Councils. The Strategic Planning Board, Local Enterprise Partnership (LEP) and Local Plan Advisory Board (LPAG) act as a resource to coordinate joint working.	
Timetable	Prepare Draft Local Plan	November 2011 – May 2012
	Regulation 18 consultation	19 th July – 10 th September 2012
	Pre-Submission publication. Regulation 19	October – December 2014
	Submission	January 2015
	Examination	June 2015
	Suspension	January 2016
	Resume Examination	Summer 2017
	Inspectors Report received	Autumn 2017
	Adoption	Winter 2017

Resources	The document will require significant input from the Planning Policy Team and officers from other Council Departments
Review	Once the Local Plan is adopted, the policies and delivery strategy will be monitored annually in the Authority Monitoring Report
Policies Map	The Policies Map will be updated when the Local Plan is adopted. Proposed changes will be set out during the consultation on the publication of the Local Plan.

Gypsy and Traveller Sites DPD		
<p>The Gypsy and Traveller and Travelling Showpeople Sites DPD will identify a supply of specific deliverable sites sufficient to provide five years' worth of sites, to meet the locally set target which is underpinned by the Gypsy and Traveller Accommodation Assessment (GTAA). This will include provision for public and private sites. The DPD will also identify a supply of specific developable sites or broad locations for growth, for year's six to ten and years eleven to fifteen of the plan period.</p> <p>It is important that the preparation of the DPD is carried out alongside, or closely following the Local Plan to ensure that the Council is meeting the objectively assessed requirements for Traveller sites.</p>		
Geographical Area	Arun District but excluding that part within the South Downs National Park Boundary	
Subject to Independent Examination	Yes	
Produced jointly with other authorities?	No, although related background evidence has been produced jointly with the Coastal West Sussex authorities and West Sussex County Council. The approach for transit provision has been agreed countywide.	
Timetable	Regulation 18 consultation	Summer 2018
	Pre-Submission publication. Regulation 19	Spring 2019
	Submission	Autumn 2019
	Examination	Spring 2020
	Inspector's Report Received	Summer 2020
	Adoption	Summer 2020

Resources	The document will require significant input from the Planning Policy Team and officers from other Council Departments
Review	Once the Gypsy and Traveller and Travelling Showpeople Sites DPD is adopted, the policy and delivery strategy will be monitored annually in the Authority Monitoring Report

Small Sites Allocations Development Plan Document		
Geographical Area	All parts of Arun District excluding that part within the South Downs National Park Boundary	
Subject to Independent Examination	Yes	
Produced jointly with other authorities	No, although Parish and Town Council's may wish to assist and update their NPs accordingly	
Timetable	Regulation 18 consultation	Autumn/Winter 2020
	Pre-Submission Publication. Regulation 19	Autumn 2021
	Submission	Winter 2021/22
	Examination	Summer 2022
	Inspector's Report Received	Winter 2022/23
	Adoption	Winter 2023
Resources	The document will require significant input from the Planning Policy Team and officers from other Council Departments	
Review	Once adopted, the policy and delivery strategy will be monitored in the Authority Monitoring Report	

CIL Charging Schedule		
Geographical Area	Arun District but excluding that part within the South Downs National Park Boundary	
Subject to Independent Examination	Yes	
Produced jointly with other authorities	No	
Timetable	Commencement for preparation will be when the Arun Local Plan is adopted.	
	Preliminary Draft Charging Schedule	Summer 2018*
	Draft Charging Schedule	Summer 2019*
	Examination	Spring 2020*
	Inspector's Report Received	Summer 2020*
	Adoption	Summer 2020*
Resources	The document will require significant input from the Planning Policy Team and officers from other Council Departments	
Review	Once adopted, the policy and delivery strategy will be monitored in the Authority Monitoring Report	

* Dates are subject to adoption of the ALP

APPENDIX 3 – Indicative Evidence Base

Housing
Locally Generated Needs Study 2010
SHLAA Update 2012
Strategic Housing Land Availability Assessment in the South Downs National Park (2013)
SHMA Update 2012
Broad Locations for Growth Visioning Study (2013)
Strategic Housing Market Assessment Validation Report (2013)
West Sussex Gypsy and Traveller Accommodation Assessment (2009)
Coastal West Sussex Gypsy & Traveller Accommodation Assessment (2013)
Gypsy, Traveller and Travelling Showpeople Sites Study (2013)
Report of Findings: Strategic Housing Market Assessment (SHMA) Validation (2013)
Assessment of Housing Development Needs Study – Sussex Coast HMA (2014)
Updated Housing Needs Evidence (2016)
Local Plan Strategic Site Assessment Options (2016)
LEGA Development Delivery Study (2016)
Housing and Economic Land Availability Assessment (HELAA) (2016)
Housing Viability/Viability
Local Plan Viability Assessment Update (2017)
Affordable housing options - Viability study update 09/10
Economic viability of affordable housing options - update 2007
Affordable housing viability study 2006
Affordable housing viability study 2005
Arun Housing Needs survey 2003
Employment
Employment and Economic Land Assessment – 2010
Open for Business: Economic Strategy for Arun 2009-2026
Arun & Chichester: Assessment of Employment Needs 2005
Transient Worker Study
West Sussex Growers Association Study into the Glasshouse Industry
Employment and Economic Land Assessment (2010)
Feasibility and Viability Assessment, Oldlands Farm, Bognor Regis (2011)
Interim Planning Policy Guidance on Enterprise@BognorRegis (2012)
Angmering Employment Sites Assessment (2013)
Coast to Capital Strategic Economic Plan (2014)
Arun Employment Land Needs Update (2016)
Retail
Arun District Retail Study (2013) and Update 2016
Transport
Arun Transport Study Stage 3 Final Report (2017)
A27 Arundel Bypass Wider Economic Impact Study (2013)
Arun District Strategic Transport Study (2013)
A29 Realignment Viability Study (2013)
A29 Woodgate Study (2012)
A259 Route Improvement Study (2013)

Lyminster Bypass Study (2012)
A27 junction capacity modelling 2010
Strategic Transport Modelling Study 2009 and Addendum Reports
Arun Strategic Transport Study 2006 (and additional scenarios)
Renewable Energy
Landscape Sensitivity Analysis and Low Carbon Study 2009
West Sussex Sustainable Energy Study 2009
Landscape and Environment
Landscape Study Phase 1 (2016)
Indoor And Built Facilities Needs Assessment (2016)
Indoor Sport And Leisure Facilities Strategy (2016)
Playing Pitch Strategy - Assessment Report (2016)
Playing Pitch & Outdoor Sports Strategy & Action Plan (2016)
Open Space Assessment Report (2016)
Open Space Study Standards Paper (2016)
HRA Stage 1 Report Baseline Data for Site Evaluations (2016)
HRA Stage 2 Report Screening For Likely Significant Effects (2016)
Soils and Agricultural Land Assessment Study (2013)
Habitats Regulations Assessment (2013) and 2017
Green Infrastructure Study (2012)
Landscape and Visual Amenity Aspects of Development choices 2006
Habitat Study 2008
Flood Risk And Water
Strategic Surface Water Management Study – Stage 1 (2016)
Strategic Surface Water Management Study – Stage 2 (2016)
Strategic Surface Water Management Study – Stage 3 (2016)
Strategic Flood Risk Assessment 2008
Sequential and Exception Test 2009
West Sussex Strategic Flood Risk Assessment and Sequential Test (2010)
Infrastructure and funding
Infrastructure Delivery Plan Phase 1 (2016)
Infrastructure Delivery Plan Phase 2 (2017)
Infrastructure Delivery Plan 2013
Infrastructure and funding study 2009
Waste
Costs related to waste collection and levels of recycling for new housing allocations
Other
District Analysis Baseline Report 2008
Settlement Sustainability Study 2007 (draft 2009)

APPENDIX 4 - Risk Assessment

	Risk	Impact	Actions
1	Elections cause delays in decision making	<ul style="list-style-type: none"> - Causes slippage in programme - Possible change in emphasis in document 	<ul style="list-style-type: none"> - Ensure that timetable is flexible to change. Plan Local Plan Preparation around processes external to Planning Policy Team.
2	Loss of key staff	Slippage in programme	<ul style="list-style-type: none"> - Recruit to vacant posts as quickly as possible
3	Volume of work greater than anticipated e.g. on submitted representations	<ul style="list-style-type: none"> - Causes slippage in programme 	<ul style="list-style-type: none"> - Ensure timetable is realistic but has some flexibility built in - Monitor progress against LDS - Consider additional resources
4	Lack of in-house skills for specialised areas of policy work/Sustainability Appraisals/background studies	<ul style="list-style-type: none"> - Slow progress causing a slippage in programme - Objectives on quality compromised - Evidence base is challenged/undermined 	<ul style="list-style-type: none"> - Ensure Local Plan financial resources available - Take prompt action to fill vacancies - Ensure working arrangements between teams are clear.
5	Updates to evidence base studies and new reports undertaken by external specialists are delayed or take longer than anticipated.	<ul style="list-style-type: none"> - Causes slippage in programme - Sections of the Local Plan can not be completed due to lack of evidence. 	<ul style="list-style-type: none"> - Ensure briefs for consultants are clear and hold regular project progress meetings. - Set clear deadlines for consultants
6	Policy Team required to do other unforeseen work, including additional appeals/work on other corporate projects	<ul style="list-style-type: none"> - Diverts team from LDF causing a slippage in programme 	<ul style="list-style-type: none"> - Local Plan made a corporate priority and other work minimised - Consider additional resources/using staff from other departments

	Risk	Impact	Actions
7	Insufficient budget provision to finance the project	<ul style="list-style-type: none"> - Work slips or cannot be progressed - Objectives on quality compromised 	<ul style="list-style-type: none"> - Budget and spending to be kept under review
8	Local Plan programme too ambitious	<ul style="list-style-type: none"> - Key milestones in programme not met and Housing and Planning Delivery Grant reduced 	<ul style="list-style-type: none"> - Ensure LDS is realistic - Monitor progress against LDS and amend if necessary - Prioritise Local Plan
9	Planning Inspectorate unable to meet the timescale for examination and reporting	<ul style="list-style-type: none"> - Examination and/or report is delayed - Key milestones in programme not met 	<ul style="list-style-type: none"> - Close liaison with the Planning Inspectorate to ensure early warning of any problems (e.g. consultation on LDS) - Maintain up to date Service Level Agreements with the Inspectorate
10	Local Plan fails test of “soundness”	<ul style="list-style-type: none"> - Local Plan has to be withdrawn and further work undertaken for resubmission - Progress on other LDD/CIL charging schedule slips 	<ul style="list-style-type: none"> - Ensure documents have a robust evidence base and well audited community and stakeholder engagement - Undertake NPPF and legal compliance self-assessment - Maintain close working relationship with the Planning Inspectorate, particularly with regard to new Local Plan examination process - Keep up-to-date on experience from elsewhere - Keep up-to-date with NPPF and test of soundness
11	Legal Challenge	<ul style="list-style-type: none"> - Adopted document quashed - Additional workload - Legal costs 	<ul style="list-style-type: none"> - Ensure procedures, Act, Regulations etc. are complied with - Undertake soundness self-assessment
12	Community Infrastructure does not pass examination or is not adopted	Pooling restrictions on S106 contributions could reduce the ability to secure sustainable development/impact mitigation.	Work with the development industry on the potential development allocations to ensure objections are minimised and appropriate joint S106 and CIL exemptions are in place.