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3 October 2018

LOCAL PLAN SUBCOMMITTEE

A meeting of the Local Plan Subcommittee will be held in Committee Room 1 (the Pink Room) at the Arun Civic Centre, Maltravers Road, Littlehampton on **Tuesday 16 October 2018 at 6.00 p.m.** and you are requested to attend.

Members: Councillors Bower (Chairman), Charles (Vice-Chairman), Ambler, Mrs Bence, Mrs Brown, Chapman, Cooper, Elkins, Mrs Hall, Haymes, Oppler, Mrs Pendleton and Stanley [+ 1 Independent Vacancy].

A G E N D A

1. APOLOGIES FOR ABSENCE
2. DECLARATIONS OF INTEREST

Members and Officers are reminded to make any declarations of pecuniary, personal and/or prejudicial interests that they may have in relation to items on this agenda and are reminded that they should re-declare their interest before consideration of the item or as soon as the interest becomes apparent.

Members and officers should make their declaration by stating :

- a) the item they have the interest in
- b) whether it is a pecuniary, personal and/or prejudicial
- c) the nature of the interest

- 3 MINUTES

To approve as a correct record the Minutes of the meeting held on 11 June 2018 (attached).

4 ITEMS NOT ON THE AGENDA WHICH THE CHAIRMAN OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

5 HOUSING DISTRIBUTION METHODOLOGY FOR NEIGHBOURHOOD PLANS AND THE NON-STRATEGIC SITES DEVELOPMENT PLAN [NSS DPD]

This report updates Members on the engagement process with Town and Parish Councils on the methodology for the distribution of 'at least' 1,250 dwellings in accordance with Policy H SP1 'The Housing Requirement' of the adopted Arun Local Plan 2018 [see Background Paper]. The delivery of this target will be via new or revised Neighbourhood Plans together with a Non-Strategic Sites Development Plan Document where Neighbourhood Plans are not being prepared/reviewed.

6 ARUN DISTRICT COUNCIL GYPSY & TRAVELLING SHOWPEOPLE SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT [DPD]

This report outlines the proposed approach and timetable for the preparation of the Arun District Council Gypsy & Travelling Showpeople Site Allocations DPD covering the period 2018-2036, which will identify and allocate land for permanent pitches to meet the need identified to 2036.

7 THE PUBLISHED REVISED NATIONAL PLANNING POLICY FRAMEWORK [NPPF] 2018

This report updates Members on the Published Revised National Planning Policy Framework [NPPF], the key changes and any implications for Plan making within the Arun District and including maintaining housing supply.

8 MERGER OF LOCAL PLAN SUBCOMMITTEE [LPSC] AND COMMUNITY INFRASTRUCTURE LEVY [CIL] SUBCOMMITTEE

There are currently two separate subcommittees established to consider these planning policy matters and documents – the Local Plan Subcommittee (LSPC) and the Community Infrastructure Levy Subcommittee (CIL) and it is no longer considered necessary or efficient to have these separate committees. It is proposed that the functions of the CIL Subcommittee are transferred to the LPSC because they are related and both matters will be making recommendations to Full Council.

At the same time it would be appropriate to review the name of the sub-committee if it is to have a wider scope. It is proposed that it be known as the Planning Policy Sub-Committee.

Note: *Indicates report is attached for all Members of the Subcommittee only and the press (excluding exempt items). Reports can be accessed through the Council's website at www.arun.gov.uk

Note: Members are also reminded that if they have any detailed questions, would they please inform the Chairman and/or relevant Lead Officer in advance of the meeting.

Subject to approval at the next Subcommittee meeting

LOCAL PLAN SUBCOMMITTEE

11 June 2018 at 6.00 p.m.

Present : Councillors Bower (Chairman), Charles (Vice-Chairman), Ambler, Mrs Bence, Mrs Brown, Chapman, Cooper, Elkins, Mrs Hall, Haymes and Oppler.

1. Congratulations

The Chairman extended the Subcommittee's warmest congratulations to Councillor Mrs Brown on her award of the OBE in the Queen's Birthday Honours List.

2. Apology for Absence

An apology for absence had been received from Councillor Stanley.

3. Declarations of Interest

There were no declarations of interest made.

4. Minutes

The Minutes of the meeting held on 26 February 2018 were approved by the Subcommittee and signed by the Chairman as a correct record.

5. Start Times

The Subcommittee

RESOLVED

That the start times of meetings for the remainder of 2018/19 be 6.00 p.m.

6. Statement of Community Involvement

The Planning Policy Team Leader presented this report and highlighted that the Statement of Community Involvement had been updated in line with new legislation and regulations to reflect the enactment of the Neighbourhood Planning Act, resulting in a new section within the document related to Neighbourhood Development Plans. The section relating to Development

Subject to approval at the next Subcommittee meeting

Management Changes had also been amended to reflect the inclusion of additional information in respect of the Development Management process, as opposed to providing information purely to do with the pre-application process.

In considering the item, a question was asked with regard to whether there was any mechanism in place to check the authenticity of the many community groups operating in the District, together with the veracity of individuals acting as representatives of those groups through a proper process, rather than them just putting their own name forward. It was felt that a robust data base needed to be in place. A response was given that, as a result of the newly introduced GDPR (General Data Protection Regulations) process, the data base would be reviewed and updated and the team would work closely with the Communications department in respect of the consultation groups known within the District.

Following further general comments, the Subcommittee was advised that, following receipt and collation of the consultation responses, it was anticipated that a further report would be presented to the September meeting.

The Subcommittee

RESOLVED - That

(1) the draft Statement of Community Involvement be approved for a four week period of public consultation from 5 July to 2 August 2018; and

(2) the Group Head of Planning, in consultation with the Portfolio Holder for Planning, be delegated authority to agree minor editorial changes prior to publication.

7. Local Development Scheme

Members were advised by the Planning Policy Team Leader that the LDS (Local Development Scheme) was a short, high level work programme that set out what DPDs (Development Plan Documents) the Council was going to produce over a rolling three year period. The current LDS had come into effect in 2017 to reflect the stage that had been reached with the preparation of the Local Plan. With the adoption of the Local Plan imminent, it was considered appropriate to revisit the work programme now and update the LDS to indicate the next set of DPDs to be prepared.

The revised LDS (attached as Appendix 1) covered the three year period from 2018-2021 and included a timetable for the preparation of the Non-Strategic Site Allocation DPD and a Gypsy & Traveller and Travelling Showpeople Site Allocations DPD.

Subject to approval at the next Subcommittee meeting

In the course of a brief discussion, a request was made and agreed that an additional comment be included in the risk assessment to flag up the level of risk associated with each heading, e.g. red, amber or green.

The Subcommittee

RECOMMEND TO FULL COUNCIL - That

(1) the Local Development Scheme 2018 be endorsed and adopted, as set out at Appendix 1 to the report; and

(2) authority be delegated to the Group Head of Planning, in consultation with the Portfolio Holder for Planning, to undertake minor updating and drafting of any amendments required prior to publication.

8. Non-Strategic Site Allocations Development Plan Document

The Subcommittee was advised by the Principal Planning Officer by way of this report that the Arun Local Plan was set for adoption in July 2018 and that the Local Plan Inspector had made a commitment that the Council would start working on the Non-Strategic Site Allocations DPD (Development Plan Document) immediately after.

There was a commitment to provide at least 1,250 dwellings in the Non-Strategic Sites Allocations DPD, with an input and contribution from revised Neighbourhood Development Plans, where appropriate. The DPD would identify sites which would accommodate less than 300 units, in line with the definition of strategic development.

The report set out the approach that would be taken in developing the DPD.

Members participated in some general discussion relating to the involvement of the Town and Parish Councils in the process and were advised that a meeting was being held on Friday 15 June, which was due to be well attended by Parish representatives.

The Subcommittee then

RESOLVED

That the contents of the report be noted.

9. Housing and Economic Land Availability Assessment (HELAA)

The Subcommittee received this report which set out the general approach and timetable for the preparation of the 2018 HELAA and which included a 'call for sites' exercise.

Subject to approval at the next Subcommittee meeting

Following consideration, the Subcommittee

RESOLVED

That the general approach and timetable for the preparation of the 2018 Housing and Economic Availability Assessment and 'call for sites' exercise be noted.

(The meeting concluded at 6.46 pm)

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF LOCAL PLAN SUB-COMMITTEE ON 16 OCTOBER 2018

PART A : REPORT

SUBJECT: Housing Distribution Methodology for Neighbourhood Plans and the Non-Strategic Sites Development Plan (NSS DPD)

REPORT AUTHOR: Kevin Owen, Planning Policy Team Leader

DATE: 18 September 2018

EXTN: X37853

PORTFOLIO AREA: Planning & Infrastructure

EXECUTIVE SUMMARY:

This report updates members on the engagement process with Parish and Town Councils on the methodology for the distribution of 'at least' 1,250 dwellings in accordance with policy H SP1 'The Housing Requirement' of the adopted Arun Local Plan 2018 (see Background paper). The delivery of this target will be via new or revised Neighbourhood Plans together with a Non-Strategic Sites Development Plan Document where Neighbourhood Plans are not being prepared/reviewed.

RECOMMENDATIONS:

1. That the process of agreeing the housing distribution methodology and commitment to Neighbourhood Plan making with the Parish Councils and Neighbourhood Planning bodies, in order to achieve the 1,250 target, is supported.
2. That LPSC agree the broad distribution targets (Appendix 1) as the starting point for plan making subject to further adjustments from workshop engagement, testing via the methodology and the sustainability appraisal process, with a view to finalising the distribution in January 2019 and undertaking a Regulation 18 Notification (part 1) issues and options consultation.

1. BACKGROUND:

- 1.1 The adopted Arun Local Plan 2018 Policy H SP1 'The Housing Requirement' sets out the total housing requirement for Arun in order to deliver its 20,000 housing target between 2011-2031 - a component of which is 'at least' 1,250 dwellings that must be identified through Neighbourhood Plans or an Non-Strategic Sites Development Plan Document or both. The requirement is for this process to commence immediately on adoption.
- 1.2 In 2017 a proposed housing allocation for the Parish Councils had been discussed although this stalled because of the Local Plan examination. Arun officers recommenced this engagement and had a Parish Council workshop on 20th June to

explain that Arun District Council (ADC) would revisit the housing numbers now that we were approaching an adopted Plan and would consult on the proposed methodology and listen to views from the workshop.

- 1.3 The proposed draft housing distribution and methodology (see Appendix 1) was issued to the Parish Councils for comment on 26th July following ALP 2018 adoption. The subsequent letter issued by Arun District Council on 20th August (appendix 2) specifically asks the Parishes to provide an indication as to whether they intend to undertake a neighbourhood plan review and a their position on the proposed housing targets by the time of the scheduled workshop of 3rd October 2018. A number of constructive responses have been received although some Parishes consider the proposed figures are not sustainable. Officers have also attended several Parish meetings and one to one meetings in order to address outstanding questions over the methodology and what housing supply (based on the HELAA deliverable and developable sites outside of the built up rea boundary) or other supply, could count towards the proposed housing target.

REPORT

- 1.4 At the time of reporting – the Parish Workshop scheduled for 3 October will have met and a verbal update can be provided to the committee on committed Neighbourhood Plans/reviews and the proposed housing distribution. In addition, a further letter was sent in advance of the workshop (see Appendix 3) clarifying outstanding questions raised at meetings and providing more information on land supply. This workshop is necessary to enable officers to gauge the residual element of the 1,250 housing target that will need to be addressed though the NSS DPD.
- 1.5 It must be noted that the whole process of development plan preparation whether via NP or the NSS DPD, must meet the legal requirements of Sustainability Appraisal (SA) including SEA and HRA where appropriate. The NPPF 2018 reiterates this legal requirement in para 32 stating that in order to do this, the SA must demonstrate how the plan has addressed the three sustainable objectives set out in the framework, avoided adverse impacts (including achieving opportunities for net gains) or where unavoidable, adverse impacts are mitigated or compensatory measures are secured.
- 1.6 The implications of SA both for the NSS DPD and the NP is that any housing distribution may be adjusted with a need for further identification of options and distributions and so the final figures will come from an iterative process. This will become clearer in the lead up to a planned workshop in January 2019 prior to the Regulation 18 Notification and consultation on issues and options in the spring.
- 1.7 The NSS DPD will need to take decisions compatible with Policy SD SP1a Strategic Approach of the adopted Local Plan and in accordance with the Sustainability objectives of the SA process (in line with NPPF 2018 requirements) in determining any residual distribution of the 1,250 figure and delivering Parish target figure where no NP is to be prepared/revised.
- 1.8 The SA process has necessitated a further step in plan delivery timetable (i.e. Regulation 18 part 1 Notification) for the NSS DPD and so the reported timetable in the Local Development Scheme (LDS) will need to be updated and then adopted by

Full Council and published on the web site. While the extra stage will delay the programme it will only mean that adoption of the NSS DPD will be in the February of 2021 rather than December 2020. Progress towards maintaining a 5 year housing land supply and meeting annualised plan housing targets will therefore be maintained – the critical stage of Full Council submission and sign off the plan will be achieved in 2020 and be a strong basis for defending development management decisions. A report on updating the LDS will be added to the Forward Plan.

- 1.9 The above means that a full draft NSS DPD should be ready for consultation in the summer of 2019 with site proposals to make up any residual figure not met by the Parish Councils Neighbourhood Plan preparation/reviews. The NSS DPD will include the target figure for the Neighbourhood Plan areas in order to maintain monitoring progress on Parish NP allocations and implementation so that the examination into the NSS DPD can demonstrate that the full 1,250 figure and hence the Objectively Assessed Need for the adopted Arun Local Plan is being delivered.

Conclusions

- 1.10 The progress on the housing methodology needs to be strongly grounded with the local communities and Parishes. There will be some iteration of the housing numbers before the final output in the spring – however, the workshop on 3rd October will be able to establish which Parishes will prepare Neighbourhood Plans/reviews. The plan making timetable will need to be adjusted with a further report on the LDS to this committee followed by adoption at Full Council.
- 1.11 The Committee is invited to endorse the housing methodology process and numbers as the appropriate approach to agreeing a final housing numbers outcome for consultation in the Spring 2019.

2. PROPOSAL(S):

That the report be noted and the consequent implications for plan preparation timetable.

3. OPTIONS:

Not to progress the engagement work on the methodology – however, this would lead to significant delays and challenges to the robustness of the NSS DPD preparation and any Neighbourhood Plan preparation and undermine maintaining progress on achieving housing delivery targets.

4. CONSULTATION: None

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		No
Relevant District Ward Councillors		No
Other groups/persons (please specify)		
5. ARE THERE ANY IMPLICATIONS IN RELATION TO	YES	NO

THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)		
Financial		No
Legal		No
Human Rights/Equality Impact Assessment		No
Community Safety including Section 17 of Crime & Disorder Act		No
Sustainability		No
Asset Management/Property/Land		No
Technology		No
Other (please explain)		No

6. IMPLICATIONS:

The modest impact on the plan making timetable and need to revise the LDS.

7. REASON FOR THE DECISION:

To ensure that Arun can continue to secure that development is plan led and consistent with sustainable development, while minimising the cost, including environmentally, arising from planning appeals.

8. BACKGROUND PAPERS:

Adopted Local Plan (Policy SD SP1a Strategic Approach and Policy H SP1 The Housing Requirement):

<https://www.arun.gov.uk/download.cfm?doc=docm93jjim4n12549.pdf&ver=12567>

Methodology for distributing the housing figures Technical Advice Note

Distribution of Development

Introduction

The Arun Local Plan 2011- 2031 (ALP 2018 2018) was adopted on 18th July 2018. Whilst the ALP 2018 2018 sets out the strategic pattern of growth and development in the district until 2031, it also recognises that further development is required to be identified. The ALP 2018 includes a commitment to provide at least 1,250 dwellings in a separate Development Plan Document (DPD) with an input and contribution from revised Neighbourhood Development Plans (NDPs) where appropriate.

Paragraph 12.1.8 of the ALP 2018 2018 states that*‘The Council will commence the production of a Non-Strategic Site Allocations DPD immediately after the adoption of the Local Plan for those areas of the District which are not covered by, or committed to the preparation of an up-to-date Neighbourhood Plan. Neighbourhood Plans and the Non-Strategic Site Allocations DPD will allocate sufficient sites to meet any identified shortfall, in accordance with the Local Plan housing trajectory..*

As a consequence, the DPD will identify how the housing number will be distributed across the Local Planning Authority Area (LPAA) by Town and Parish administrative area. This will enable the Council to actively manage the spatial distribution of development in order to ensure that it complies with both National and local policy (i.e. the strategic approach set out in Policy SD SP1a ALP 2018 2018) and importantly is properly scoped and assessed by the Sustainability Appraisal/SEA and Habitats Regulations.

Figures will be provided on an individual Town and Parish basis and will be used as part of the Neighbourhood Development Plan process as well as that of DPD production. The complete list of numbers by parish will be included within the DPD. Such an approach has been established as part of local plans prepared by other local planning authorities.

This paper sets out the methodology for establishing how the global figure of 1,250 should be distributed across the LPAA. Such an approach should demonstrate that the emerging NSS DPD offers a sustainable approach to development that is consistent with the Arun Local Plan as well as the character of the District and takes full account of local opportunities and constraints. Previous versions should be ignored.

The DPD is to be prepared to cover the same planning period 2011-2031 as the ALP 2018 at a scale consistent with the evidence and infrastructure to support the “at least 1,250 dwellings” distribution (hereto referred to as the global figure) but also to meet the need to ensure a 5 year housing land supply can be maintained following adoption of the ALP 2018. Anything significantly higher would risk requiring commissioning a wholly new evidence base.

Why do we need a Housing Distribution Methodology?

The Housing Distribution Methodology sets out the criteria and steps as well as the process as to how the global figure will be distributed across the LPAA. This needs to be made in the context of local and national policy and guidance.

Sustainable Development – National Policy

The principle of sustainable development underpins all aspects of planning policy as set out in the National Planning Policy Framework (NPPF). To plan development sustainably, it is important to

have an understanding of the character, role and function of different settlements and how they relate to each other within settlement hierarchies. It is also necessary to identify the future requirements of different communities and to assess their potential capacity for future growth and change.

We therefore, need to understand the role and function of places, so that we can direct new development to those places where intervention has the most chance of changing things for the better, and above all improving sustainability.

One of the core planning principles in the National Planning Policy Framework is to:

“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which can be made sustainable.”

Arun Local Plan 2018

Policy SD SP1a establishes the strategic approach to development in the district until 2031.....which actively seeks to manage sustainable patterns of growth by directing housing and employment to those settlements with a good range of services and facilities, and is therefore in accordance with the NPPF.

It is therefore important that the distribution options are developed in the context of the existing strategic development approach, together with other local and national policies, to ensure they reflect a sustainable pattern of growth.

Like other authorities, ADC has established a settlement hierarchy.

Future Housing Distribution

The Housing distribution will be shaped by; a) what are we trying to achieve in certain areas in terms of sustainable development that new housing development can help deliver; and b) what are the limits and constraints in certain settlements that might impact on the number of new houses that can be built; c) what can be brought forward as a minimum, not a maximum.

It is worth remembering that the ALP 2018, as well as existing Neighbourhood Plans establishes a number of overarching policy messages/policy directions that need to be taken in to account. This will include known housing allocations but also other proposals related to issues such as regeneration and employment growth, infrastructure and environmental constraints.

Base date

The ALP 2018 covers the period 2011-2031. The base date for the Local Plan land supply runs from 2011 to a position as at April 2017 based on completions and outstanding commitments - as identified in the supporting evidence base (e.g. Housing and Employment Land Availability Assessment (HELAA)). However, this will need to be updated to April 2018. Parish Councils will also need to identify supply based on completions and commitments from the period April 2018 in order to cover the plan period to 2031 on which the overall 20,000 dwelling housing target is fixed. The 1,250 dwellings are a component which needs to be identified via a Neighbourhood Plan or the NSS DPD. A common base date is important because it will align monitoring of the authority's 5 year housing land supply. It is however, for the Neighbourhood body to determine whether they are preparing, reviewing (in whole or in part) their Neighbourhood Plan to cover 5, 10 or 15 years from any base date.

Need/OAN

The ALP 2018 includes the requirement for the 1,250 which is a component of the overall strategic assessment of Objectively Assessed Housing Need (OAN) within the District. This OAN has been thoroughly tested and found 'sound' following local plan examination hearings and an Inspector's Report.

Normally any development plan document will need to start with an OAN as part of demonstrating meeting the tests of 'soundness'. However, as the NSS DPD is being prepared under the overall policy framework of the ALP 2018 such a rigorous assessment of need in order to determine an allocation of housing numbers at the local level is not required and is indeed quite difficult without detailed local evidence preparation.

At the local level – Parish Council's and Neighbourhood Plans will still benefit from local intelligence on detailed local needs and will be able to use this to help test appropriateness and deliverability of any distribution of the global figure around particulate settlements and communities. The Draft National Planning Policy Framework and Planning Policy Guidance (NPPF and PPG) also indicate that Neighbourhood Plans may still need to consider local evidence on housing need to guide housing provision.

Indicative Housing Distribution

The draft NPPF/PPG has signalled that where a local authority has not yet allocated a housing figure for Neighbourhood Plans they may provide an indicative figure/distribution. Arun District has previously circulated an indicative figure based on the global 1,250 housing figure, to Parish Councils/Neighbourhood Plan bodies. The hybrid option 4 figures (circulated in August 2017), provide a useful starting point but is only based on a combination of factors such as Parish population, sustainable settlement structure, land availability (HELAA). The Council has listened to the views of Parishes expressed at the recent (15th June 2018) meeting and has re-examined the approach to consider issues of existing spatial policy; the need to take account of lead times for infrastructure delivery of Strategic Allocations and also other constraints and the diverse character of Parishes. The revised proposed indicative figure is set out in the appendix and the previously circulated figure is included for reference.

It must be strongly caveated that should the Parishes and Neighbourhood Planning bodies wish to test this indicative distribution, that because it originates from the Council as part of its plan making, the distribution will be subject to the Sustainability Appraisal/SEA and HRA process for the NSS DPD as well as the methodology outlined in this briefing paper on sieving locations against sustainable development policy. For example, the latter would need to consider availability of local facilities, accessibility including by road walking, cycling and public transport and known development constraints (e.g. landscape, strategic gaps, wildlife and functional flood plain). Another key consideration will be the likely availability of sites (drawing on the Housing Land Availability Assessment which is being updated with a 'call for sites').

In order for the NSS DPD to be found 'sound' it will also need to ensure that any housing figure allocated to the Parishes and Neighbourhood Plan areas is consistent with national and local policy and legally compliant (e.g. with Sustainability Appraisal SA/SEA and Habitats Regulation Assessment) but is also whether it is sustainable viable and deliverable – otherwise there is a risk that the global figure would not be achieved by the NSS DPD in combination with the Neighbourhood Plans. Neighbourhood Plan will also need to consider whether they require an SA/SEA and HRA and this will depend on the likelihood of there being any significant effects.

The implication is that the indicative figure may be amended or indeed redistributed after this process. The Council's preference would be for the Parishes to wait and engage in the initial strategic assessment with the benefit of early SA/SEA scoping and reasonable alternatives to inform the distribution. This process is expected to commence during the summer of 2018, with the development of reasonable alternatives expected to take place in November 2018.

Methodology Assessment

Essentially, the methodology is split in to 3 key parts:-

1. a strategic level, district wide assessment (related to the ALP 2018 and Sustainability Appraisal - scoping/initial reasonable options),
2. a detailed local level Town/Parish assessment related to need and constraints etc.
3. Final Assessment provided by way of individual Settlement Capacity Profiles

It is proposed that the figures allocated to town and Parish Councils via the NSS DPD and included within the DPD will be the culmination of a comprehensive assessment process which will include regular engagement with the Parishes and is discussed here.

There are a number of steps which as proposed below:

Stage 1: Strategic Level District Wide Assessment and SA/SEA/HRA

This stage will be undertaken by the District Council in association with the Town and parish Councils. All of the information discussed below shall be recorded by way of a stage one Settlement Capacity Profile proforma.

The first stage that the assessment will need to do is to review the strategic approach identified within the ALP 2018 policy SD SP1a: 'Strategic Approach', which sets the councils approach to achieving sustainable development in Arun district. This includes securing economic, social and physical regeneration, and providing sufficient homes, whilst protecting and enhancing Arun's unique character and environment. Essentially, it is an assessment of the function that different areas play in the future of the district.

The distribution of the global housing figure should therefore, reflect the strategic direction established in policy SD SP1a which is based on the existing characteristics of settlements and their intended role through the Local Plan period.

The policy focuses development around the coastal towns of Bognor Regis and Littlehampton in order to support their roles as the main service, employment, retail and employment centres within the district. Development should recognise the sustainable and historic character of the town of Arundel, and provide for growth of the sustainable villages, whilst maintaining their setting within the open countryside.

The ALP 2018 and the settlement sustainability study are useful starting points for the definition of a sustainable village within the district.

The approach could therefore be said to identify a form of settlement hierarchy in that development should be focused on all three the towns and the sustainable village settlements. Further consideration should be given to the scale of development which is proposed as a result and would need to take into account existing significant proposed development.

New housing should not be provided in isolation, but should be built where facilities already exist or could be upgraded or provided. Given the current state of the economy and Government intentions, it could be a sensible option to distribute housing to those areas with existing capacity within key services, as it is unlikely that there will be funding for new strategic facilities for some time. This could also help to maintain these facilities where they could be under threat of closure, particularly if we take a 'cluster' approach when looking at settlements. Equally, where there is already significant growth proposed there may be physical, economic, environmental and infrastructure limits to growth and this will need to be taken into account.

The result of this assessment will identify a potential spatial distribution of development at the district level. This establishes areas for development and those areas not suitable for development i.e. areas with important landscape or biodiversity constraints, or areas where different levels of growth/development would be expected (so as to accord with the strategic direction policy).

This will be informed by a review of supply (this is partly reflected in option 4 of the indicative housing distribution previously circulated) but will need to be reviewed and updated following the call for sites for the NSS DPD as well as the update of housing supply via the HELAA.

Understand the situations regarding permission, commitments and allocations to understand the future role of the area

Once a clear understanding has been identified with regards to which Town and Parish Council will potentially have some form of development based on policy SD SP1a, the next stage is to understand the situations regarding permission, commitments and allocations to understand the future role of the area.

This will enable the Council to have a better understanding of how the town/parish will change, based on current known levels of growth. Such information will enable a 'baseline' understanding of character of the district to be understood against potential development opportunities.

This information is available across the district and could be potentially disseminated down to parish level. This will include:

- Planning permissions
- Commitments
- Completions
- Strategic allocations
- NDP allocations

Assess issues related to potential supply

Assess the amount of land that is suitable, available and achievable for development. This will vary across the district and the presence or otherwise of sites will have a direct influence on the spatial distribution of development.

The Councils main source of sites is the HELAA, which is updated on an annual basis. It is currently being updated at the moment, and will be completed by the autumn.

In order to get a more realistic opinion of the capacity of sites in the district, the information in the HELAA will be taken one stage further and more realistic densities established for the sites (where needed). Whilst the density (and therefore capacity) of each site is included as part of the HELAA, a more realistic density may be identified where it is considered that the suggested density (based on the viability study) is not considered to be suitable. However, it must be acknowledged that the draft NPPF requires better consideration of proposed density in order to ensure that all land is used as efficiently as possible.

The figures will be developed and tested to ensure that they are realistic and achievable in terms of available and deliverable sites using the following criteria:

- Only included sites in or adjacent to towns, village etc. will be identified to ensure accordance with Policy SD SP1a of the ALP 2018.

- Both deliverable and developable SHLAA sites will be considered, with some sites included in the development of estimates where it was considered likely that evidence from landowners/developers/statutory consultees would indicate that constraints may be overcome
- Sites below 5 dwellings will not be considered.

The suitable capacity is then identified for each parish and town using the information from above in order to inform the more realistic capacity of the individual administrative areas established via a detailed local assessment.

Identify significant constraints

The Council has prepared an extensive evidence base as part of the ALP 2018. This includes evidence related to constraints such as landscape and flooding. It is acknowledged that this information may need to be updated, but provides a useful starting point.

The following constraints are identified as those which will prevent development from taking place, and will influence the amount of land available for development:

- Special Protection Areas (SPA)
- Special Areas of Conservation (SAC)
- Ramsar sites
- Sites of Special Scientific Interest (SSSI)
- Regionally important geological and geomorphological sites
- Flood zone 3b
- Open space
- Ancient woodland
- Sites of Nature Conservation Interest (SNCI),
- Nature reserves,
- Historic parks and gardens, Scheduled Ancient Monuments (SAMs)
- Local Green Space

Infrastructure will also be a key consideration in terms of existing capacity and also the scope/feasibility and viability of enhancing or providing new infrastructure capacity.

Such information will be mapped to assist the identification of sites, whilst also enabling a more realistic site capacity figure to be identified.

Workshop

The Council plan to organise a workshop in September which will enable it to present this methodology in more detail, whilst also reviewing/discussing the content of the stage one proforma. All Town and Parish Councils will be invited to this workshop. This workshop will be useful to start filling the pro forma.

Stage One Outputs

One of the outputs from the stage one work will be a list of sites that can be assessed as part of the Sustainability Appraisal work. This list of sites will provide the starting point for the identification of reasonable alternatives, whilst also forming part of the Habitats Regulations assessment process.

This is a critical stage in the housing distribution methodology and will need Parish/Neighbourhood engagement. The aim will be to undertake this phase of scoping of reasonable alternatives for the

distribution of development/identification of sites with the Parish and Neighbourhood Plan bodies at a further workshop planned to take place in November to coincide with the SA timetable. This will be in association with the consultants undertaking the Sustainability Appraisal.

It is important to note that at the end of this stage of the methodology, certain Town or Parish Council areas may not be allocated a potential housing number. As such, they will be discounted from the remainder of this process. Where areas are to be discounted, justifications will be provided by the district council explaining the reasons behind such a decision.

The remainder of the Town and Parish areas will then be considered under the stage 2 assessments.

Stage 2: Detailed local level Town/Parish assessment and SA/SEA HRA

The stage 2 assessment shall be undertaken by either those Town or Parish Councils who have confirmed that they wish to review their Neighbourhood Development Plan or by Arun District Council for those areas to be covered by the NSS DPD. In this instance, this will be undertaken with the involvement of the relevant Town and Parish Council as they will have local knowledge.

All of the work discussed below will be recorded by way of a stage 2 Settlement Capacity Profile proforma and will entail further SA/SEA and HRA discounting of options. Where there are potential significant effects the Parish Council then undertake further more detailed local SA/SEA of their Neighbourhood Plan options and sites.

A proforma and guidance note will be provided to those Town and Parish Councils preparing the stage two assessment in order to assist them with their work. Parishes may also wish to refer to the Draft PPG toolkit in testing and assessing their indicative housing allocations:-

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/687239/Draft_planning_practice_guidance.pdf

Character assessment, local capacity and constraints

A detailed assessment of the character and infrastructure issues of the individual Town and Parish areas should be undertaken in order to understand what the characteristics of the areas are like, along with any known constraints which will influence where development could be located within particular settlements and land plots.

The NSS DPD will do this for the Parishes affected by the global housing figure distribution, except where Neighbourhood Plans are being reviewed wholly or in part (as necessary) or newly prepared.

Extant existing local Neighbourhood Plans/policies will shape such an assessment.

Assess issues related to need

As set out under the OAN text above, need is not an overriding factor in determining any local distribution of the global housing figure at the strategic level as it has already been tested through the Local Plan examination. Consultation on national policy (NPPF) indicate that any further proving of local need will not be necessary in order to inform a strategic allocation of a housing figure via the NSS DPD.

However, the issue of need is likely to be an important local factor for Parishes and Neighbourhood Plans when considering the detailed allocation of the distribution of the global housing numbers and whether further disaggregated amongst settlements and communities is required, according to the size, form, tenure and type of housing to be provided. This is also recognised by the draft NPPF/PPG I terms of preparation of Neighbourhood Plans.

Information related to need is available at the district level in the form of the Housing waiting list but may require further updating with bespoke local surveys. Indeed locally commissioned evidence was prepared to support some of the made NDP's. Therefore, in preparing/updating Neighbourhood Plans, Town and Parish Councils which are allocated a housing figure via the NSS DPD methodology should be prepared to undertake/refresh such assessments (or commission consultants to prepare them on their behalf). This will in turn assist the preparation of the NSS DPD.

The Draft NPPF and PPG indicate that Neighbourhood Plans should regard any allocated figure (or indicative) figure to be a minimum and where possible to exceed the requirement, for example through allocating reserve sites for choice and flexibility.

This is an important point because the Inspector examining the Arun Local Plan considers that the 1,250 global figure is "at least" on the basis that allocation DPD's tend to yield more housing. In addition it should also be understood that the Council's 5 year housing land supply (5.3 years at April 2017) is vulnerable and affected by the delivery rates of Strategic Allocations which depend on significant infrastructure with long lead times.

In addition to meeting and exceeding the housing allocation within the chosen Neighbourhood Plan period (which may be over 5, 10 or 15 years), it may also be prudent to identify options for safeguarded land beyond the Neighbourhood Plan period where it is relatively short, and it would be appropriate to do so.

Stage 3: Final assessment

The final stage is to conclude on the outputs of the strategic and local assessment stages outlined above. For each parish, Settlement Capacity Profiles shall be prepared which will set out conclusions for NSS DPD policy, presenting a summary of future development potential. It is proposed that this stage will be shaped by a further workshop with the Parish councils and Neighbourhood Plan bodies in December 2018.

Consultation

The Council's assessment of the potential and capacity for housing development in each parish will be refined through consultation, which will seek the views of parish and town councils, and other key stakeholders on the proposed indicative parish number methodology.

Appendix 1 Option Indicative Distribution

Parish	1,250 split	HELAA Deliverable	50% deliverable	Developable	10% Developable	Total deliverable and developable	parish population	strategic	FINAL FIGURE	Comments
Aldingbourne	63	110	55	251	25.1	361	3820	Yes	70	Provision of infrastructure as part of propose developments allow for more sustainable development.
Aldwick	63	0	0	0	0	0	11280		0	No land supply.
Angmering	63	303	151.5	545	54.5	848	7615	Yes	135	30% reduction due to significant lead time for infrastructure and strategic allocations present.
Arundel	63	0	0	238	23.8	238	3475		50	Land Supply suggests some sustainable growth located here.
Barnham /	63	135	67.5	146	14.6	281	1390	Yes	75	Provision of infrastructure as poart of propose developments allow for more sustainable development.
Eastergate	63	0	0		0		3415	Yes	0	Provision of infrastructure as part of propose developments allow for more sustainable development.
Bersted	63	0	0	0	0	0	8495	Yes	0	Zero figure due to the level of development and infrastructure lead times.
Bognor Regis	63	153	76.5	208	20.8	361	24065		300	The Town is a sustainable location which is considered suitable for development. Development will also assist with the economic regeneration of the town in accordance with the aims of the ALP. No strategic allocation proposed, therefore a 200% increase based on potential land supply.
Climping	63	0	0	67	6.7	67	770	Yes	10	Low figure to reflect the character of the area and proposed allocation and infrastructure lead times.
East Preston	63	0	0	0	0	0	5490		10	Windfall and exceed.
Felpham	63	0	0	0	0	0	9745		10	Windfall and exceed.
Ferring	63	66	33	0	0	66	4480		25	Based on supply issues and the 10% discount.
	63		0		0					
Ford	63	0	0	0	0	0	1690	Yes	0	No figure due to the character of the area, exsiting strategic allocation and infrastructure lead in times.
Kingston	63	48	24	0	0	48	625		24	Low figure character but some potential land supply within the parish.
Littlehampton	63	275	137.5	104	10.4	379	27795	Yes	200	The Town is a sustainable location which is considered suitable for development. Development will also assist with the economic regeneration of the town in accordance with the aims of the ALP. Also a strategic allocation is located with in the parish.
Middleton on Sea	63	144	72	1221	122.1	1365	5075		200	Significant potential and supply but moderate based on character, site availability and significant constraints.
Pagham	63	0	0	124	12.4	124	5490	Yes	10	Existing allocations and significant infrastructure lead in times. Environmental sensitivity.
Rustington	63	13	6.5	7	0.7	20	13885		10	Site provision and windfall exceed.
Walberton	63	412	206	263	26.3	675	2175	Yes	60	The parish has potential land supply, however there is an exsiting allocation and a permission which sugggest a modest figure is established.
Yapton	63	540	270	399	39.9	939	3570	Yes	90	The parish has potential land supply, however there is an exsiting allocation and a permission which sugggest a modest figure is established.
Lyminster & Crossbush/	63	0	0	0	0	0	370		10	Character suggests a low figure, however may be the opportunity for sustainable development to meet local need.
Poling	63	0	0	0	0	0			10	Character suggests a low figure, however may be the opportunity for sustainable development to meet local need.
Total		2,199	1,100	3,573	357	5,772			1299	



Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex. BN17 5LF

Tel: (01903) 737500

Attention: Parish/Town Council Clerk/Contact

web: www.arun.gov.uk
email: localplan@arun.gov.uk

20th August 2018

Please ask for: Kevin Owen
Planning Policy Team
Directorate of Place
Direct Line: (01903) 737853

Dear Parish Council Clerk/Contact,

Non-Strategic Site Allocations Development Plan Document (DPD) and Neighbourhood Plans Workshop

I am writing to you to advise you that the date for the above workshop has now been firmed up for the 3rd October 2018. Unfortunately, the provisional date of 21st September was not achievable because of difficulties accommodating the Sustainability Appraisal consultants and other officers. I hope that this date is agreeable and offers some of you more time to seek approval for a response to the housing figures and NSS DPD methodology circulated on the 26th of July and seeking a response by 17th September.

As before, the workshop will be in the Council Chamber from 09.30 to 11.30am. The workshop will be in two parts – first part covering the NSS DPD methodology and housing figures together with a Community Infrastructure Levy update and the second part will cover the Sustainability Appraisal scoping consultation.

I have had several constructive responses already and it would be good to get as many as possible in writing before the workshop. Based on a written letter response, it would be helpful if your respective responses considered (at a broad level):-

- the allocated housing figures in the draft methodology in relation to known/potential sites in your area (e.g. either HELAA sites and or other potential sites that may be available)
- an idea of potential capacity, opportunities and constraints (e.g. service provision, flooding mitigation or highway safety)
- local issues regarding necessary infrastructure that would overcome any constraints for sites and that could also inform Arun's Infrastructure Development Plan for potential CIL funding
- a confirmation whether the Parish/ Neighbourhood Plan body will prepare a Neighbourhood Plan or review their Neighbourhood Plan

If you are unable to provide all of the above prior to the meeting or need our assistance this can be followed up at the workshop.

In addition, several questions have been raised as follows, with Arun's response in each case, set out below:-

What is the timescale/base date?: Arun District Council adopted the Arun Local Plan on 18th July 2018 (ALP 2018). The ALP 2018 covers the plan period 2011 to 2031. Policy H SP1 'The Housing Requirement' sets out that the Council must immediately take steps to engage with you to agree preparation of, or reviews of, Neighbourhood Plans to allocate "at least 1,250 dwellings" to be found over the remaining plan period to 2031. Where this is not possible, Arun will be preparing a Non-strategic Site Allocations DPD (i.e. sites of up to circa 6 - 300 dwellings). It is most likely that there will be a combination of an NSS DPD and reviews/preparation of Neighbourhood Plans. The most sensible monitoring point would therefore, be April 2018 in order to align the monitoring of supply over the remaining plan period on delivery of housing and to avoid potential double counting. The ALP 2018 housing figures are currently based on the supply monitoring data for the year April 2016 to March 2017. A 2018 base date will therefore, use the most up to date figures for April 2017 to March 2018. Further, as the NSS DPD will largely rely on the evidence under the ALP 2018 it is also sensible for Neighbourhood Plans to also use this evidence for consistency including the opportunity to utilise NSS DPD Sustainability Appraisal. See questions below.

Do existing Neighbourhood Plan allocations count towards the housing figures?: In principle, this is a fair suggestion. However, having looked into this, the ALP 2018 already includes the contribution coming from 'made Neighbourhood Plans i.e. 421 dwellings as (set out in table 12.1) which is a component of the overall housing supply. The 1,250 dwelling figure is the net additional requirement and is the difference between the known sources of housing supply in Table 12.1 and the increased OAN for the District (i.e. the increase to circa 20,000 dwellings from the previous figure of 15,000 in the submitted 2014 local plan).

What is the windfall allowance?: Windfall sites are defined in Annex 2 of the NPPF (2018) as "Sites not specifically identified in the development plan". The ALP 2018 makes an allowance for 847 dwelling windfall contributions within table 12.1 components of supply for Arun District over the plan period. This is a separate figure to the Non-Strategic Sites figure and therefore detailed housing delivery monitoring will be required to avoid double counting. Any double counting would undermine the District's housing supply including the 5 year housing land supply calculation which currently stands at 5.3 years and so is vulnerable.

Why have we not used the housing figures proposed in 2017?: The Council wanted to ensure that there was an opportunity to engage further, listen to your views and concerns and respond following the examination period. The engagement process following the examination had been disrupted due to the Main Modifications process as well as resource capacity constraints and changes in key personnel. The workshop in June 2018 was invaluable in understanding your views and looking again at the figures in order to be more transparent on the housing distribution. While the overall figures have remained broadly similar, for some areas further adjustments have been made taking into account land supply (HELAA Deliverable and Developable sites), as well as issues related to known constraints and the presence of existing allocations in the Arun Local Plan (2011-31).

Can an explanation of the modified housing distribution figure in the Circulated NSS DPD methodology be provided?:

It is easier if we take the following example and review the figure identified for Angmering to explain the approach that we have taken. This will be explained on a column, by column basis:-

- Angmering:
- Column 1 shows a pro rata split of the 1,250 dwellings across all Parishes as a benchmark=63 [assumes 20 Parish/NPs – Barnham/Eastergate combined and Lyminster & Crossbush and Poling combined] Column 2 total HELAA 'Deliverable sites dwelling capacity* within Angmering Parish = 303 dwellings

- Column 3 assumes 50% of deliverable HELAA sites may reasonably be expected to come forward= $303/100 \times 50 = 151.5$
- Column 5 shows total Developable sites within Angmering Parish = 545
- Column 6 assumes 10% of developable sites may reasonably be expected to come forward= $545/100 \times 10 = 54.5$
- Column 6 is the total potential supply from columns 3 and 6 = $303+545 = 848$ dwellings as a benchmark
- Column 7 shows the Parish population as sustainable settlement benchmark where services may be expected to be available
- Column 8 comments indicates with Yes (beige colour) the degree of fit with the spatial development strategy set out within the ALP2018 Policy SD SP1a
- Column 9 total final housing allocation adding column 3 and 6 figures $151.4 + 54.5 = 135$
- Column 10 provides contextual commentary, as a broad judgment (reflecting issues raised at the June workshop), which considers character and delivery lead times/infrastructure issues and scale of growth already within the Parish.

The Blue colour highlights in column 9 are just to mark the results where there was zero HELAA supply within the Parish – and so should also have been highlighted against East Preston, Felpham, Poling and Lyminster & Crossbush. In these areas, based on population and windfall, a judgment was made whether it was appropriate that a modest contribution towards the housing target should be made which is discussed in Column 10 comments. Yellow highlight just picks out the 9 Parishes that previously had proposed indicative figures discussed in 2017.

**HELAA capacity of sites is based on assumptions about housing density and net developable area. Further information regarding this can be identified in the main report of the HELAA, a copy of which is located on the Councils website.*

To conclude on this letter, I would like to provide the opportunity for 1:1 meetings prior to the workshop by making myself available on Thursday 13th and Friday 14th September to discuss this letter and the draft methodology – I am also happy to try and attend, where feasible, any Parish Council meetings (after the 29th August).

I am also extending the response deadline to Friday 21st September if this is helpful to complete your response or add any supplementary comments if you have already responded. Please forward your responses to Mr Kevin Owen at kevin.owen@arun.gov.uk (tel:01903 737853) or localplan@arun.gov.uk.

Yours sincerely,



Kevin Owen (Planning Policy Team Leader)

Arun District Council



Arun District Council
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Maltravers Road
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Tel: (01903) 737500

Attention: Parish/Town Council Clerk/Contact

web: www.arun.gov.uk
email: localplan@arun.gov.uk

28th September 2018

Please ask for: Kevin Owen
Planning Policy Team
Directorate of Place
Direct Line: (01903) 737853

Dear Parish Council Clerk/Contact,

Non-Strategic Site Allocations Development Plan Document (DPD) and Neighbourhood Plans Workshop 3rd October 2018

I am writing to you further in advance of the workshop on the 3rd of October to address some further questions raised at Parish meetings/1:1 meetings:-

Small Sites: The definition of windfall is set at below 6 dwellings for monitoring against the Local Plan housing supply. Windfall is by definition unallocated permissions outside of the development plan. Extant/unimplemented planning permission and pending planning permissions of this size will all count towards the existing windfall allowance. The windfall figure is also projected over the lifetime (20 years of the plan) using a standard approach adopted by West Sussex County Council for all authorities within the County. Therefore, these sources may not count towards the 1,250 supply because this will lead to double counting.

However, where a Neighbourhood Planning body or Parish Council wishes to prepare a Neighbourhood Plan and proactively identifies new sites of 1-5 dwellings as part of its monitoring evidence and plan preparation and these are net additional sources of land supply – such smaller sites can count towards their housing target. By definition – Neighbourhood Plan housing allocations will not be windfall. The revised National Planning Policy Framework (March 2018) requires plans to provide a mix of sites and has set a target of at least 10% of housing land supply to come from small to medium sites (i.e. sites of 1 ha or less).

Nursing homes/extra care or sheltered housing: such developments do not count towards the suggested housing distribution target for your Parish area. The methodology for calculation Objectively Assessed Housing Need (OAN) via the Strategic Housing Market Assessment for the adopted Arun local Plan does not include use class C2 (residential institutions) housing (Development Management Procedure Order 2015) categories of demand as component of need. The housing supply from this category therefore, cannot be counted without the OAN calculation of need also having to be increased to project this component of demand and this is clearly outside the scope of the Adopted Local Plan and Non-Strategic Sites DPD.

Golf courses: Why have some Golf Course been designated as Local Green space and others not on the Local Plan Policies Map? This is because Local Green Space is designated via Neighbourhood Plans and the Local Plan Policies Map reflects such designations. Golf courses

may not necessarily constitute Open Space depending on whether there is public access and other considerations and therefore, may not necessarily be designated as such on the Policies map.

Pending planning decisions on blue HELAA sites outside the BUAB since 1st April 2018: Such sites may count towards supply - provided that they are not 'windfall' and are not already included within 'small' or 'large' site commitments or 'Neighbourhood Plan' allocations within the local plan table 12.1 (including when updated with the 2017/2018 data) and that they are pro-actively identified as net additional sites/supply via a reviewed or newly prepared Neighbourhood Plan process. One measure to achieve this is for Arun, as part of its monitoring process, to set out an interim monitoring framework for the NSS DPD which also captures candidate net additional sites for Neighbourhood Plans identified by Parishes.

I also undertook to provide further supply information with respect to the Windfall/small sites and larger commitments and Neighbourhood Plan allocations for each Parish that are already counted towards supply. The spreadsheets set out in the email accompanying this letter includes schedules (excel sheet) for Windfall/small sites, HELAA sites and Neighbourhood Plan allocations that are already counted within the housing land supply (this is to 31st March 2017 - officers are currently working on updating the land supply and HELAA to 31st March 2018).

We have also been able to provide a further excel sheet which lists HELAA 'Developable' and 'Deliverable' sites for each Parish on separate tab sheets which allows you to identify the potential sources of supply to contribute towards the 1,250 target outside of the Built Up Area Boundaries.

I hope that this letter and accompanying information helps to resolve a number of outstanding questions and provides further clarity on housing land supply. Please contact me should you need further clarification (Mr Kevin Owen at kevin.owen@arun.gov.uk (tel: 01903 737853) or localplan@arun.gov.uk).

Yours sincerely,



Kevin Owen (Planning Policy Team Leader)

Arun District Council

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF LOCAL PLAN SUB-COMMITTEE ON 16 OCTOBER 2018

PART A : REPORT

SUBJECT: Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document

REPORT AUTHOR: Donna Moles, Senior Planning Officer

DATE: 18 September 2018

EXTN: X37697

PORTFOLIO AREA: Planning & Infrastructure

EXECUTIVE SUMMARY:

A revised joint Authority Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) has been commissioned to reflect the regulation change to the definition of Gypsies and Travellers and Travelling Showpeople and assess Arun's need on this basis. The GTAA will form the evidence base to inform the allocation of sites through the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD) as set out in paragraph 12.7.6 of the adopted Arun Local Plan 2011-2031 in accordance with the revised evidence and to ensure preparation of a 'sound' Development Plan for Arun district..

This report outlines the proposed approach and timetable for the preparation of the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations DPD covering the period 2018-2036 .

This DPD is to identify and allocate land for permanent pitches to meet the need identified to 2036..

RECOMMENDATIONS:

The following action is recommended:

1. That Local Plan Sub-Committee notes the proposed approach and timetable for the preparation of the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD) covering the period 2018-2036, including the key outputs Gypsy and Traveller Accommodation Assessment (GTAA) Report 2018.

1. BACKGROUND:

The Coastal West Sussex Local Authorities of Adur, Arun, Chichester and Worthing

together with support from the South Downs National Park Authority previously commissioned a joint Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (April 2013). This study covered the period 2012 to 2027 and has a base date of September 2012. It complied with the Housing Act 2004, the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (2012). It provided the evidence base for the Arun Local Plan policy H SP5.

The Government updated Planning Policy for Traveller Sites (PPTS) in August 2015 and this included a change to the definition of Gypsies and Travellers, and travelling showpeople. In particular the new definition's key change is the removal of the term persons ... who have ceased to travel permanently ie. those who have ceased to travel permanently will no longer fall under the definition of Traveller for the purposes of accessing accommodation for planning purposes. In light of this, a new assessment of accommodation needs was required by the Coastal West Sussex Local Authorities. This assessment is usually known as a Gypsy and Traveller Accommodation Assessment (GTAA). The GTAA will form part of the evidence base and will inform the development of policy and future allocation of sites through the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations DPD.

The evidence on accommodation needs is required to comply with the statutory duties of section 8 of the Housing Act 1985 (as amended by section 124 of the Housing and Planning Act 2016) and was prepared in accordance with national policy including the NPPF, PPTS 2015, the Draft guidance to local housing authorities on the periodical review of housing needs: caravans and houseboats (March 2016) and the Equalities Act 2010. The evidence covers the needs of Gypsies and Travellers as well as the needs of travelling showpeople and the report is appended to this report (note that the final study is yet to be published pending typographical changes which will not materially change the key outputs for Arun as set out in this report - the final GTAA evidence report is anticipated for publication imminently) as Background paper 1 (Coastal West Sussex Authorities Gypsy and Traveller Accommodation Assessment Report June 2018). The baseline date for the study is January 2018 which was when the majority of the household interviews were completed.

It is important to note that the previous GTAA covered the period 2012-2027 and the new GTAA (2018) will cover the period 2018-2036. As far as any outstanding need for the period 2012-2017 is concerned this new assessment assumes that supply and demand for the period 2012-2017 net to zero, and the new assessment then starts with a new baseline and identifies all current and future need as of January 2018. As such there is no unmet need to be provided for the preceding period under the new planning definition.

In summary, there is a need for 9 additional pitches in Arun over the GTAA period to 2036 for Gypsy and Traveller households that meet the planning definition and a need for up to 3 additional pitches for Gypsy and Traveller households that may meet the planning definition. There is a need for 14 additional plots in Arun over the GTAA period to 2036 for Travelling Showpeople households that meet the planning definition and a need for up to 1 additional plot for Travelling Showpeople households that may meet the planning definition.

It is not a requirement for a GTAA to include an assessment of need for households that do not meet the planning definition (this will already be a component of the Objectively Assessed Need for the adopted Arun Local Plan). However, the report includes this assessment for illustrative purposes to guide the Council on levels of need that will have to

be considered as part of the wider housing needs of the area (including to 2036) through Local Plan Policies, and to help meet requirements set out in the Housing and Planning Act (2016).) Overall, there is need for 13 additional pitches for households that do not meet the planning definition.

2. GYPSY AND TRAVELLER AND TRAVELLING SHOWPEOPLE SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)

There is a commitment in the Local Plan to prepare a DPD which identifies and allocates land for permanent pitches to meet the need identified. The period beyond 2031 to 2036 would be an appropriate period to allow for an effective 15 year provision and the plan making lead time.

Consultants appointed for preparing the site assessment evidence will adopt methodology which reflects current best practice and which is consistent with the methodology set out in Background paper 2 (SELVP30) for assessing permanent sites for Gypsy and Traveller and Travelling Showpeople June 2016. Consultants have also been appointed for the Gypsy & Traveller Sustainability Appraisal and together this evidence processes will form a sound basis for progressing a G&T Site Allocations DPD.

3. NEXT STEPS AND TIMETABLE

The current timetable for this DPD is anticipated as follows:

- Call for sites – May 2018
- GTAA evidence – Summer 2018
- Sites identification – Winter 2018
- Reg. 18 (part 1)– Spring 2019
- Reg.18 (Part 2) _ Summer 2019
- Reg 19 Consultation – Spring 2020
- Reg.22 Submission – Summer 2020
- Reg. 24 Examination - Autumn 2020
- Reg. 25 Inspector's Report – Winter 2020
- Reg. 26 Adoption Full Council – Spring 2021

Officers will bring this item back to Local Plan Sub Committee at appropriate stages throughout the preparation of the DPD.

2. PROPOSAL(S):

That the report be noted and the consequent evidence used in order to prepare a Gypsy & Traveller Development Plan Document.

3. OPTIONS:

Not to progress and update the evidence base on the Gypsy & Traveller accommodation

needs assessment using the Government's planning definition (published in Planning Policy for Traveller Sites 2015) would risk preparing an unsound Development Plan Document and lead to planning via appeal and unplanned development.

4. CONSULTATION: None

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		No
Relevant District Ward Councillors		No
Other groups/persons (please specify)		
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial		No
Legal		No
Human Rights/Equality Impact Assessment		No
Community Safety including Section 17 of Crime & Disorder Act		No
Sustainability		No
Asset Management/Property/Land		No
Technology		No
Other (please explain)		No

6. IMPLICATIONS:

The modest impact on the plan making timetable and need to revise the LDS.

7. REASON FOR THE DECISION:

To ensure that Arun can continue to secure that development is plan led and consistent with sustainable development, while minimising the cost, including environmentally, arising from planning appeals.

8. BACKGROUND PAPERS:

Adopted Local Plan (Policy SD SP1a Strategic Approach and Policy H SP1 The Housing Requirement):

<https://www.arun.gov.uk/download.cfm?doc=docm93jjim4n12549.pdf&ver=12567>

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF CABINET ON 16 October 2018

PART A : REPORT

SUBJECT: The Published Revised National Planning Policy Framework 2018

REPORT AUTHOR: Kevin Owen, Planning Policy Team Leader

DATE: 18 September 2018

EXTN: x 37853

PORTFOLIO AREA: Planning & Infrastructure

EXECUTIVE SUMMARY: This report updates members the Published Revised National Planning Policy Framework, the key changes and any implications for Plan making within Arun District and including maintaining housing supply.

RECOMMENDATIONS:

1. That Local Plan Sub-Committee notes the key policy provisions made by the revised NPPF 2018 and consequent implications for Arun District Council's Plan making, monitoring and housing supply and consequent need for increased resources and refers this matter to Cabinet.
2. That a legal opinion is sought to confirm the Council's understanding in respect of the Housing Delivery Test in order to confirm the recent adoption of the Plan will mean the HDT will not apply until November 2019 for the purposes of 5 year housing land supply.

1. BACKGROUND:

1.1. Members will be aware that the Government published revised National Planning Policy Framework (NPPF) on 24th July 2018 following an earlier consultation (including on accompanying documents) on 5th March 2018. A briefing note was circulated in April to all members on the key changes.

1.2. The key areas proposed in the March NPPF consultation which are welcome and can be summarised as:-

- Amending/streamlining the structure of the NPPF; the definition of 'sustainable development to include 3 broad objectives for the planning system (economic, social and environmental), 'Presumption in favour of sustainable development' and the tests of 'soundness'
- Further clarity on plan making, housing policy and meeting housing needs
- Including additional forms of provision towards housing supply
- Defending a robust 5 year housing land supply through Local Plan adoption.

1.3. However, there were also proposed changes which needed further clarification and potentially raised concerns about the need for further resources:-

- Requiring a Strategic Plan/policies for an area and consequent implications for Local Plans
- Amending the tests of soundness
- The Housing Delivery Test
- Standard Housing Methodology
- Increased stakeholder engagement and transparency on preparing housing evidence e.g. the HELAA and potentially an Annual Position Statement (APS)

2. REPORT

2.1. The final published NPPF 2018 has followed through on all of these proposed changes and has also provided further clarification on some of these issues included amended policy.

Clarifications

- Strategic and non-strategic policies have been clarified – strategic policies cover broad locations, allocations and infrastructure necessary to address the strategic priorities of an area (including any relevant cross boundary issues) and look over a minimum 15 year period whereas, non-strategic policies within Local Plans Neighbourhood Plans do not and this distinction should be made explicit within plans.
- Standardised methodology and Housing Delivery Test – these remain without significant change – however, the Government has identified in its consultation response, that the outputs of revised 2016 based projections via the methodology reduce the minimum numbers generated – will be adjusted to ensure that outputs are consistent with the government's policy on boosting housing delivery, after they are released in September 2018.
- Front loading viability assessment for development contributions through the plan (e.g. affordable housing and other infrastructure) without the need to be repeated at the applications stage is retained – however, para 34 and 57 remove the role of local plans setting out the circumstances when further viability assessment may be required. Instead, this is placed on the applicants to justify such a need (decision makers will have to weigh up the circumstances including, how up to date policies are and evidence is and material site circumstances).
- Social rent – (NPPF Glossary – Annex 2) is included as 'affordable housing for rent' product and further amendments made to the definition of affordable housing in relation to 'starter homes' (although the income threshold for eligibility is to be a matter for secondary legislation)

Additional Changes

- Town centre diversification – the reference to town centres in decline has been removed and emphasis placed on diversification being the key to town centre vitality and viability through positive strategies identifying the appropriate range of uses

permitted in such locations in order to respond to rapid changes in the retail and leisure industries.

- Requirement for small/medium sized sites (0.5 ha or less) to be a minimum proportion of Local Plan housing supply has been reduced from 20% to 10% (and the threshold increased to 1ha) unless there are strong reasons this is not achievable.
- Using design policies as a key to boosting housing delivery – paragraph 124 sets out that design expectations should be clear and how these will be tested will be critical for delivering sustainable development requiring strong community engagement (e.g. through workshops, the use of local design standards/guides) and refusal of developments of poor design. Para 130 also requires the standards to be maintained between permission through to completion.
- Land assembly and Compulsory Purchase – paragraph 119 clarifies some of the power authorities should use – and in particular refers to facilitating land assembly where possible and using compulsory purchase powers if this will benefit housing delivery and better development outcomes.
- Heritage policy paragraph 187 now requires authorities to maintain or have access to an Historic Environment Record (HER) with a view to this assisting in identifying new heritage assets and para 193 states that ‘great weight’ should be given to an assets conservation regardless whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Key Implications

‘Presumption in favour of sustainable development’ ‘tests of soundness’ and Sustainability Appraisal (SA) legal requirements

2.2. The policies of the NPPF apply to decision making immediately on publication on 24th July. However, with respect to plan making, Arun has an up to date adopted Local Plan and will have a high degree of consistency with the NPPF. Para 213 clarifies that policies should not be considered out of date purely because they were adopted before the NPPF revision – it will be a matter of weight given according to their degree of consistency. It is therefore, likely that the weight given to some Local Plan policies may depend on the degree consistency with the NPPF.

2.3. Plan making implications of the NPPF going forward will therefore fall on the next review of this Plan and also the preparation of the Non-strategic Sites DPD (NSS DPD) and the Gypsy & Traveller DPD (G&T DPD), summarising as follows:-

- ‘Presumption in favour of sustainable development’ - confirms that plans should meet the development needs of their area and be flexible to change and as a minimum, provide for objectively assessed needs including unmet needs from neighbouring areas, unless it would contravene important protected areas and the policies of the NPPF as a whole.
- Positively prepared - seeking to meet an areas objectively assessed need, as a minimum, informed by agreements with other authorities so that unmet needs from

neighbouring areas is met where practical and consistent with sustainable development.

- justified - 'appropriate strategy' (as opposed to the most appropriate strategy).
- effective - working on cross boundary strategic matters that have been dealt with rather than deferred (evidenced via statements of common ground).
- para 32 Sustainability Appraisal (including SEA) meeting the legal requirements by demonstrating how the plan has addressed three sustainable objectives (including opportunities for net gains) avoided adverse impacts or where unavoidable, are mitigated or secure compensatory measures.

2.4. The NSS DPD forms part of delivering the adopted Arun Local Plan 2018 and covers the same plan period to 2031. The OAN is already established as well as the target figure of 'at least' 1,250 dwellings. The development strategy also established in Policy SD SP1a 'Strategic Approach'. There are therefore, no significant implications from the NPPF changes although the 'Duty to Cooperate' process will need to ensure that cross boundary implications (should there be any) are picked up and addressed or positions agreed should there be no cross boundary implications, via Statements of Common Ground'.

2.5. The sustainability (and SEA) process is also front loaded for the NSS DPD preparation process (including for relevant Neighbourhood /plans) but will need to respond to seeking opportunities for net gains (e.g. in environmental assets), avoidance and mitigation/compensation for unavoidable adverse impacts.

2.6. The G&T DPD will be a separate DPD with revised evidence base (i.e. Gypsy & Traveller Accommodation Needs Assessment 2018) covering the period to 2036 focused on a single topic. This will also need to respond to the NPPF changes in particular the duty to cooperate, meeting minimum OAN (GTAA) requirements, environmental gains and increased flexibility to identify an appropriate spatial strategy.

Housing Delivery Test (HDT) and Standard Housing Methodology

2.7. In addition to allocating specific deliverable sites over the first 5 years (with an appropriate buffer) and specific developable sites or broad locations over years 6-10 and where possible 11-15, there is also requirement for authorities to update annually a supply of specific deliverable sites sufficient to provide a 5 year supply of housing against the housing requirement. Paragraphs 73 to 76 of the NPPF set out the provision to be made to ensure that plans maintain and deliver housing supply with an appropriate buffer, and the consequences of not doing so measured against the Housing Delivery Test.

2.8. However, paragraph 74 specifically states "A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or..." Arun meets the definition of having a recently adopted plan (set out in qualifying footnote 38) and it will be considered 'recently adopted' until 31st October the following year (i.e. 2019). It is recommended that a legal opinion on this position is sought by the Council for the avoidance of doubt.

2.9. Where Plans are out of date and cannot demonstrate a 5 year supply (with an appropriate buffer under para 73) or under achieve their housing requirement - less

than 75% over the previous 3 years (footnote 7 to the 'Presumption'), they will be measured against the Housing Delivery Test from November 2018 instead of November 2019.

- 2.10. The NPPF para 60 requires strategic policies to determine the minimum number of homes (including neighbouring unmet needs unless there are exceptional circumstances) to be informed by a 'local housing needs assessment' measured against the Standard Housing Methodology. While Arun has a recently adopted plan and the HDT may only apply in November 2019 it would be prudent nevertheless, for work to be commissioned on this basis in order to prepare for next year.
- 2.11. Further, steps will need to be taken to improve the monitoring of Arun's housing supply – para 67 requires HELAA evidence to be more robust in future on deliverable and developable sites trajectories and together with para 73 and 74 such evidence will need to have been prepared with full engagement with developers and landowners with a view to providing an 'Annual Position Statement' which will be vetted by the Secretary of State (PINS) who will make recommendations on any disputed delivery rates for sites within submitted APS. Officers are looking at how this may be progressed – a significant element of monitoring housing supply comes from West Sussex County Council. There will need to be a significant resource input by Arun to bring this work in house or to improve the robustness of WSCC monitoring data as well as transforming the HELAA into an APS. A further report on this will be brought to the committee in due course.

Imposing a Planning condition

- 2.12 As part of the emphasis on speeding up housing delivery para 76 asks local authorities to consider imposing a planning condition which requires development to begin within a specified timeframe, shorter than the relevant default period, where this would speed up delivery without undermining development viability. Authorities should also review why any earlier grant of permission on major developments of a similar nature, did not commence. These changes will also be significant for improving the HELAA/APS evidence preparation outlined above.

Affordable housing and affordable rent

- 2.13 Affordable housing must be delivered as a minimum of 10% on major developments (para 64.). Affordable housing for rent is included within the definition for affordable housing where; the rent is set at the Government's rent policy for social rent or affordable rent or is 20% below market rent; and is secured as such for future eligible households (or subsidy recycled) via a registered provider; or Affordable private rent via another provider if delivered via build for rent.

Exceptions sites

- 2.14 The NPPF para 71 requires authorities to support the development of entry level exception sites (i.e. sites outside of the Built Up Area Boundary) for first time buyers (or renters) where such needs are not being met. Such housing should offer one or more types of affordable housing (as defined in the NPPF Annex 2 which includes discounted

sale or affordable rent) and be on unallocated sites adjacent to existing settlements and proportionate meeting design standards and compliant with the NPPF as a whole. It is likely that this need may be an aspect of Neighbourhood Plan making.

Achieving appropriate densities

2.15 Paragraph 122 of the NPPF provides considerations to be applied in making efficient use of land e.g. market viability, site /area character, design, availability and scope for transport and services. Para 123 states that where there is a shortage or anticipated shortage of land to meet identified housing needs that it is especially important that policies and decisions avoid homes being built at low densities. This will be robustly tested at examination – a range of minimum densities should be set for locations such as city and town centres and other locations wells served by public transport accessibility and may refuse applications where they fail to deliver efficient land uses.

Neighbourhood Planning

2.16 The application of the ‘Presumption’ is important for how communities engage in Neighbourhood Planning because they will need to support the delivery of strategic policies in local plans and spatial development strategies and shape development outside of these strategic policies (para 13).

2.17 Where there are no development plan policies or they are out of date para 14 advises that the ‘Presumption’ when applied to applications for housing which conflict with a Neighbourhood Plan “is likely to significantly and demonstrably outweigh the benefits, provided...” a number of criteria are met including; the Neighbourhood plan being two years old or less before the decision and contains housing policies that meet identified needs; the planning authority has a 3 year supply of deliverable sites (against its 5 year supply requirement); and delivery has been at least 45% of the required target the previous three years.

2.18 Paragraph 65 states that the overall housing requirement should specify an element of housing for designated neighbourhood areas which reflects the development strategy and allocations – once adopted in a plan figures do not need subsequent retesting at Neighbourhood Plan examination.

2.19 Paragraph 69 states that Neighbourhood Plans should consider allocating small to medium site – this also reflects the emphasis on ensuring that there is a reasonable mix of sites that can come forward quickly (behind the 10% target for local plan housing land supply). This is significant as it may require a revised look at how windfall (unallocated opportunity sites that come forward) is monitored to enable Neighbourhood Plan allocations below the current 6 units threshold adopted in Arun (see also para 2.11 above regarding the need to improve the robustness of evidence).

Flood risk

2,20 Paragraph 155 states that inappropriate development in areas of flood risk should be avoided by directing development away from the areas at highest risk (existing or in future with climate change and cumulative impacts). Strategic policies should be informed by a flood risk assessment (FRA) and take advice from the Environment

Agency and other such bodies (para 156) and all plans should take a sequential risk-based approach to the location of development (para 157) and then if necessary apply the exceptions test.

2.21 Development should not be allocated or permitted if there are reasonably available sites with a lower risk of flooding (para 158). Where this is not possible and taking into account wider sustainability objectives then the exceptions test will depend on the vulnerability of the site and proposed uses informed by a strategic FRA (during plan preparation) or site specific FRA (at application stage) and demonstrate wider sustainability benefits to the community that outweigh the flood risk and secure the safety of the development for its lifetime without increasing flood risk elsewhere and where possible reduce flood risk overall.

Conclusions

2.22 The main implications of the NPPF 2018 changes will impact on further plan preparation (NSSS DPD and G&G DPD) and the next review of the Local Plan – although the degree of weight given to policies in the adopted plan will reflect the degree of consistency with the NPPF. A legal opinion should be sought on Arun’s position with respect to the Housing Delivery Test in order to confirm the adoption of the Plan will mean the HDT will not apply until November 2019.

2.23 The implications of the NPPF and HDT for monitoring and housing delivery will require a revised approach to future monitoring e.g. the HELAA and Authority Monitoring Report and including whether this continues to be coordinated with WSCC or brought in house with any resource implications.

2. PROPOSAL(S): That the report be noted and the consequent implications for plan preparation and future monitoring and delivery of housing supply.

3. OPTIONS: Not to take steps to review the monitoring regime in order to meet future challenges or to keep the monitoring process as it is.

4. CONSULTATION: None

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		No
Relevant District Ward Councillors		No
Other groups/persons (please specify)		
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial	Yes	No
Legal		No
Human Rights/Equality Impact Assessment		No

Community Safety including Section 17 of Crime & Disorder Act		No
Sustainability		No
Asset Management/Property/Land		No
Technology		No
Other (please explain)		No

6. IMPLICATIONS:

Potential increased monitoring burden arising from the Housing Delivery Test and standard Housing methodology and need to align current housing monitoring via the HELAA to the Annual Position Statement process and scrutiny by the Secretary of state (PINS) in future years.

7. REASON FOR THE DECISION:

To ensure that Arun can continue to secure that development is plan led and consistent with sustainable development, while minimising the cost, including environmentally, arising from planning appeals.

8. BACKGROUND PAPERS:

Planning Policy Framework 28th July 2018:-

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF LOCAL PLAN SUB COMMITTEE ON 16 OCTOBER 2018

PART A : REPORT

SUBJECT: MERGER OF LOCAL PLAN SUB COMMITTEE (LPSC) AND COMMUNITY INFRASTRUCTURE LEVY (CIL) SUB-COMMITTEE

REPORT AUTHOR: Neil Crowther, Group Head of Planning

DATE: 1 October 2018

EXTN: x 37839

PORTFOLIO AREA: Planning

EXECUTIVE SUMMARY:

There are currently two separate sub-committees established to consider these planning policy matters and documents – the Local Plan Sub-Committee (LPSC) and the Community Infrastructure Levy Sub-Committee (CIL) and it is no longer considered necessary or efficient to have these separate committees. It is proposed that the functions of the CIL Sub-Committee are transferred to the LPSC because they are related and both matters will be making recommendations to Full Council.

At the same time it would be appropriate to review the name of the sub-committee if it is to have a wider scope. It is proposed that it be known as the Planning Policy Sub-Committee.

RECOMMENDATIONS:

- 1) That Local Plan Sub Committee recommend to Full Council that the transfer of the functions of the Community Infrastructure Levy Sub-Committee to the Local Plan Sub-Committee be agreed;
- 2) The Local Plan Sub-Committee be renamed the Planning Policy Sub-Committee to reflect its wider remit;
- 3) The revised terms of reference for the Planning Policy Sub-Committee, as set out in Appendix A to the report, be accepted; and
- 4) The Group Head of Council Advice & Monitoring Officer be authorised to make any consequential amendments to the Constitution.

1. BACKGROUND:

1. The Community Infrastructure Levy (CIL) Sub-Committee was established at Full Council in October 2012 when work was about to commence on preparing work associated with the new Levy as a result of new CIL guidance issued in December 2012. Work progressed up to June 2016 but it was then put on hold because of the

<p>resources needed to progress the Local Plan. Since the adoption of the Local Plan (July 2018) work has re-commenced on CIL.</p>																	
<p>2. The preparation of the CIL documents is inextricably linked to the Local Plan and other planning policy documents and any decisions on the contents of these documents will have implications and links with decisions LPSC are being asked to take. Further, evidence has shown that these CIL sub-committees have had relatively concise agendas and it is not considered that there is any benefit in keeping decisions on CIL (made by the CIL Sub-Committee) separate to other planning policy decisions (made by Local Plan Sub-Committee).</p>																	
<p>3. Work on preparing CIL documents is progressing again and the CIL Sub-Committee has recently met to consider this work (September 2018).</p>																	
<p>4. In order to reduce the number of meetings and for these related planning policy decisions to be taken by one Sub-Committee, it is proposed that the functions of the CIL Sub-Committee are transferred to the LPSC and that the LPSC is re-named the Planning Policy Sub-Committee. This name change will reflect the fact that the Local Plan has now been adopted and the items to be considered over the next couple of years will be other planning policy documents.</p>																	
<p>5. The terms of reference for the proposed Planning Policy Sub-Committee are attached as Appendix A. These proposals make no change to the existing functions of both Sub-Committees. The wording reflects the functions currently allocated to the LPSC and CIL Sub-Committee as set out in Part 3 (Responsibility for Functions) of the Council's Constitution [paragraphs 5.4 and 5.4].</p>																	
<p>2. PROPOSAL(S):</p> <p>The functions of the CIL Sub-Committee are transferred to the LPSC on the basis of the existing terms of reference.</p>																	
<p>3. OPTIONS:</p> <p>1) To transfer the functions of the CIL Sub-Committee to the Local Plan Sub-Committee as recommended.</p> <p>2) To retain the existing Sub-Committee structure.</p> <p>3) To propose alternative arrangements for delivering this element of the Council's democratic process.</p>																	
<p>4. CONSULTATION:</p> <table border="1"> <thead> <tr> <th>Has consultation been undertaken with:</th> <th>YES</th> <th>NO</th> </tr> </thead> <tbody> <tr> <td>Relevant Town/Parish Council</td> <td></td> <td>x</td> </tr> <tr> <td>Relevant District Ward Councillors</td> <td></td> <td>x</td> </tr> <tr> <td>Other groups/persons (please specify)</td> <td>x</td> <td></td> </tr> <tr> <td>Informal consultation has taken place with the chairman of both sub-committees as well as the Cabinet member.</td> <td></td> <td></td> </tr> </tbody> </table>			Has consultation been undertaken with:	YES	NO	Relevant Town/Parish Council		x	Relevant District Ward Councillors		x	Other groups/persons (please specify)	x		Informal consultation has taken place with the chairman of both sub-committees as well as the Cabinet member.		
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Financial		X
Legal		X
Human Rights/Equality Impact Assessment		X
Community Safety including Section 17 of Crime & Disorder Act		X
Sustainability		X
Asset Management/Property/Land		X
Technology		X
Other (please explain)		
6. IMPLICATIONS:		
None, if accepted. If it is not accepted the department would have to continue to manage two separate sub-committees.		

7. REASON FOR THE DECISION:

In order to ensure that all decisions on planning policy related matters are taken at the same sub-committee and in order to reduce the number of meetings.

8. BACKGROUND PAPERS:

Full Council, agenda 24 October 2012.
<https://www.arun.gov.uk/full-council>

PLANNING POLICY SUBCOMMITTEE – TERMS OF REFERENCE

<p>Planning Policy Sub-Committee</p> <p>14 Members of the Council</p> <p>No Member can serve on this Committee in any capacity unless all of the required training determined to be necessary by the Director of Place in consultation with the Cabinet Member for Planning has been undertaken.</p>	<ol style="list-style-type: none"> 1. To consider draft Planning Policy documents and review them. 2. To authorise public consultation on draft Planning Policy documents and material produced for public consultation reports 3. To consider responses from public consultation and amend reports accordingly 4. To make recommendations to Full Council for approval of Planning Policy documents 5. The Sub-Committee has delegated authority for decisions in terms of: <ol style="list-style-type: none"> i. Approving any expenditure within agreed budgets or public consultation ii. Agreement to consult on certain stages of plans/proposals iii. Agreement on Supplementary Planning Documents and background evidence base documents iv. Approving consultation responses v. Monitoring of progress against agreed action plans and any necessary actions to address problems pursuant to paragraph 1 above 6. The Sub-Committee can invite such other bodies as it requires in order to consider specific issues (e.g. a representative from the Environment Agency to talk about flooding issues) to attend and make presentations on planning policy matters. 7. To consider and review the preparation of the CIL charging schedule and the CIL evidence base, including the Infrastructure Delivery Plan and Viability Assessment and report key findings to Full Council. 8. To consider, oversee and review the preparations of the Regulation 123 list which includes those items to be funded by CIL and those items to be funded by Section 106 agreements. 9. To make recommendations to Full Council for approval of, and public consultation on, the CIL Charging Schedule. 11. To make recommendations to Full Council for approval of the implementation and governance of the CIL charging schedule. <p>Note The Sub-Committee will meet on an ad hoc basis</p>	<p>See Part 4 – Officer Scheme of Delegation</p>
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