

Schedule of Changes - Additional changes to be considered by Local Plan Sub-Committee 31.07.14

Issue	Comments	Proposed amendments to the Local Plan
<p>Housing consultants reviewed the remaining Housing section (section 12.1) of the Local Plan and provided suggested changes to ensure that the text is compliant with the NPPF and PPG.</p>	<p>Agree</p>	<p>Paragraph 12.1.2 make the following amendment: Arun District Council has carried out extensive community consultation in order to determine what is the right approach for the district in terms of housing growth to consider levels of housing growth in the District.</p> <p>Add the following sentence to the end of paragraph 12.1.2: Work has also been undertaken to objectively assess housing needs.</p> <p>Amend paragraph 12.1.7 as follows: Consequently, 5 and 10 year migration trend projections are lower compared with the SHMA and gave rise to a theoretical dwelling requirement housing need of, respectively, 505 and 705 (compared with the SHMA's 600 and 7550) and 550 homes per annum based on projecting forward the latest demographic trends. a Sub-National Population Projection requirement for 550 dwellings per annum.</p> <p>Amend paragraph 12.1.7 as follows: "This established Arun's objectively assessed housing needs starting point as 549 homes per annum with an uplift in the as a range of between 550-650 homes per annum</p>

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		<p>depending on other factors (see below).</p> <p>Amend paragraph 12.1.8 as follows: “The Study also concludes that the maximum number of homes that it would be feasible for the Arun market to deliver over a sustained period is 700 per annum.</p> <p>Insert a new paragraph between paras. 12.1.9 and 12.1.10 (this will knock the paragraph numbering on) as follows: “The Study considered development needs across the HMA. It concluded that it was highly unlikely, taking account of strategic development constraints, that the Objectively Assessed Need for housing could be met in full.”</p> <p>Amend paragraph 12.1.10 as follows: “With regard to the wider Housing Market Area, the study concludes that Arun should test the potential to accommodate modest additional development to meet wider sub-regional needs in addition to its own Objectively Assessed Housing Need. The Study identified that the balance between potential supply and need in Chichester District was tight while there is no need for Arun to plan for Chichester’s needs the district should consider accommodating some of Worthing’s needs.</p> <p>Amend paragraph 12.1.11 as follows:</p>

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		<p>The normal review period for a Local Plan is an appropriate timescale for any decisions on Worthing's needs given that there is a framework for meaningful and continuous plan development. This is a realistic time frame for any testing of additional development to meet wider housing need, it should however be acknowledged that this Plan does provide for headroom in housing through the Ford and Fontwell Development Plan Documents.</p> <p>Amend paragraph 12.1.23 as follows: In summary the Study finds that there is only a limited case to increase from the objectively assessed demographic based housing need starting point for both the affordability / high demand test and for the affordable homes tests. For the economy test it says The Study concludes that the Objectively Assessed Need for Housing for Arun District falls between 550 homes per annum (consistent with the demographic projections) to 650 homes per annum (with the higher level supporting stronger household formation, affordable housing delivery and potentially workforce growth). However it does state that "The evidence suggests that in the past economic growth has not been a particularly stronger driver of housing provision in the District." Taken as whole it would appear logical to increase the starting point in a 'limited' way from the 549 homes per annum.</p>

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		<p>As is recognised by the national Planning Practice Guidance 'Establishing future need for housing is not an exact science. No single approach will provide a definitive answer.' In the context of this study Arun's Local Plan establishes this context, the Council considers that 580 homes on average per year as represents a reasonable target for housing provision to maintain an objectively assessed, evidence based housing supply which meets the District's full objectively assessed housing needs.</p>
<p>Comments provided by planning officer regarding the Angmering strategic housing site raised concerns regarding the policy approach to the location of the education provision as part of the development. Furthermore, concern has been expressed that the Local Plan policy and Sustainability Appraisal rules out the relocation of the existing school by stating that a new school will be built.</p>	<p>Agree that the policy and Sustainability Appraisal should be amended to be more flexible regarding the provision of education requirements at Angmering.</p>	<p>For the fourth bullet point under "Angmering" in Policy H SP1 make the following amendment:</p> <p>" Funding for a potential third KS1 & 2 school..."</p> <p>For the second bullet point under "Community Facilities and Services" make the following amendment:</p> <p>" Funding for a potential third KS1 and 2 school..."</p> <p>To align with the Local Plan; under Option C and Education within table 9.4 of the Sustainability Appraisal amend as follows:</p> <p>"Education provision in the form of funding for a potential Key Stage 1 and 2</p>

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		<p>school east of Station Road/south of Water Lane A new school is part of the development and so will importantly increase facilities as well as capacities and provision”</p>
<p>On the 8th January, Full Council resolved that: “the Local Gap between Eastergate and Barnham be reinstated as shown in the 2003 version of the Arun Local Plan minus the land at Brooks Nursery, unless the strategic allocation for Barnham/Eastergate/Westergate and its associated infrastructure is approved. In which case, the principle to be adopted within the strategic allocation policy will be to protect against a continuous urban form/coalescence between Eastergate and Barnham;...”</p>	<p>The Proposed Submission Arun Local Plan 2014 takes forward the strategic allocation for Barnham/Eastergate/Westergate and its associated infrastructure. Therefore, as agreed by Full Council, the gap will be removed and replaced by the principle within the strategic allocation policy which protects against a continuous urban form/coalescence between Eastergate and Barnham.</p>	<p>Remove the Local Gap between Eastergate and Barnham on the Policies map and within Policy SD SP3 Gaps Between Settlements as follows:</p> <p>“The generally open and undeveloped nature of the following gaps between settlements will be protected to prevent coalescence and retain their separate identity:</p> <ul style="list-style-type: none"> • Worthing to Ferring • East Preston to Ferring • Littlehampton and Middleton-on-Sea • Pagham to Selsey • Bognor Regis to Chichester • Arundel to Littlehampton • Angmering to Rustington/East Preston • Angmering to Worthing • Felpham to Bognor Regis • Barnham to Walberton • Barnham to Eastergate”
<p>Minor factual correction to Policy EMP DM3 - Littlehampton Harbour</p>	<p>The policy needs to clearly state that contaminated land should be addressed on site rather than just contamination.</p>	<p>“addressing flood risk, contamination, access and nature conservation issues and must also be consistent with other Local Plan policies.....” as the contamination here might be anything to: “addressing flood risk, contamination ated”</p>

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		land, access and nature conservation issues and must also be consistent with other Local Plan policies....”
Officer identified that a link between Policy EMP DM3 Littlehampton Harbour and H SP1 Littlehampton Economic Growth Area including West Bank should be provided to enable improved consistency.	Agree, update Policy H SP1.	“The Economic Growth Area (Policy EMP DM4) defines the area for an Area Action Plan (AAP) Development Plan Document and as part of this includes which incorporates Littlehampton Harbour (Policy EMP DM3)..... ”
Officers identified inconsistency between the supporting text for Policy H DM1 Housing Mix and Policy D DM 2 Internal Space Standards. Furthermore, the text required updates to comply with the NPPF which requires that local planning authorities plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (paragraph 50).	Agree that the supporting text within section 12.2 should be updated and altered to ensure consistency with Policy D DM2 and to avoid repetition between Policy D DM2 and H DM1.	Amend paragraph 12.2.2 as follows: Developers should consider the findings of the Strategic Housing Market Assessment (SHMA), housing needs surveys and any other relevant information to determine the most appropriate housing mix for a new development site in order to make sure the proposed scheme meets the needs of potential residents. Given the proportion of older residents, a proportion of dwellings will be required which are suitable for people with limited mobility. Provision of homes built to Lifetime Homes Standards, is particularly encouraged by the Council through Policy D DM2. mixed with general market housing which promotes social inclusion, shall be particularly encouraged by the Council. Lifetime Homes Standards have been developed, by Joseph Rowntree, to support the construction of flexible, adaptable and accessible homes that can respond to

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		<p>changes in residents' circumstances. It is a mandatory standard for all affordable homes built from 2011 and falls within Code Level 6 of the Code for Sustainable Homes which is being gradually introduced through changes to the Building Regulations. A proportion of the population of all ages requires wheelchair accessible housing and this is something the Council will seek on suitable sites. Securing 10% provision is a target set out in <i>West Sussex Health Inequalities Strategy</i> (Local Action Plan for Arun 2012-13).</p> <p>For market housing, the SHMA(2012) indicates a district wide requirement for 8,026 additional dwellings over the period 2011-2031 of which 46% need to be three bedroom; 12% four bed; 33% two bed and 9% one bed. The SHMA identified a strong case to attract and retain family households, therefore, two and three bed properties should be delivered with decent sized rooms to appeal to families. For larger schemes (above 10 units) the Council will expect developers will to offer a mix of dwelling sizes. For affordable housing, the SHMA indicates that of the 3,440 affordable homes required (2011-2031) just over a third should be three bedroom or more; 36% two bed and 29% one bed. Requirements vary across the District and factors such as proximity to public transport and services,</p>

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		<p>place and site characteristics will determine what is a suitable dwelling mix at any particular location.</p> <p>The Council is keen to promote sustainable growth and to deliver development that reflects the demand and profile of households in the District. The final mix will be negotiated with the developer on a site specific basis, having clearly illustrated regard to the most up to date SHMA.</p> <p>The Council requires all applications to adhere to relevant/current Building Regulations, statutory planning and design requirements, the emerging Arun District Council Design Guide and any other guidance documents which may be published or referenced by the Council on site specific proposals.</p>
<p>Officers identified inconsistency between Policy H DM1 Housing Mix and D DM 2 Internal Space Standards. Policy H DM1 identifies need to make provision for 10% of housing units to comply with Lifetime Homes Standard and Wheelchair Standard Homes. However, the standards required by Policy D DM1 include these standards within all room sizes.</p> <p>Officers also identified that the requirement to deliver a mix of market and affordable</p>	<p>Agree, conflicting policies need to be addressed and the policy needs to ensure opportunities to achieve a mix of unit sizes, as recommended by the most up to date evidence, are realised.</p>	<p>Amend Policy H DM1 as follows:</p> <p>The Council will seek a mix of dwelling types and sizes, to include affordable housing units, that adhere to Policy D DM 2 and D DM3 and the latest Homes and Communities Agency design guidance including properties designed to the Habinteg Wheelchair Design standard.</p> <p>a. a minimum of 10% of housing units to comply with Lifetime Homes Standard;</p>

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<p>dwelling sizes should apply to developments of 10 or more rather than 15 or more to ensure greater choice and the delivery of a sustainable mix of housing sizes.</p>		<p>b. a minimum of 10% dwellings to be Wheelchair Standard Homes, on suitable sites;</p> <p>For developments of 150 units or more the Council shall require for market housing a balanced mix of market and affordable dwelling sizes including family sized accommodation (of three bedrooms or more), based on the most up to date SHMA recommendations.</p> <p>The tenure mix for development schemes shall be negotiated on a case by case basis taking any necessary viability considerations into account. Developers shall have regard to the Coastal West Sussex Strategic Housing Market Assessment 2012 (SHMA) or the most up to date version of the SHMA.</p> <p>The Council will particularly encourage the development of self-build homes on appropriately sized, serviced sites in the first instance or on appropriately sized sites that are capable of being serviced. Such sites can be provided either as part of a development scheme or on an individual basis.</p> <p>Proposals for conversions and changes of use to provide residential accommodation will be expected to demonstrate that wherever it is practicable, Lifetime Homes criteria have</p>

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		<p>been incorporated into the design.</p> <p>Developments shall also be consistent with all other Local Plan Policies.</p>
<p>Officer identified that Section 13.5 and Policy ECC SP2 of the Publication Version of needs to be updated since the Government's announcement to abolish the Code for Sustainable Homes system in 2016 and the incorporation of standards into Building Regulations .</p>	<p>Agree, although the supporting text and policy will need to be flexible enough to allow for the change in regulations to be phased out.</p>	<p>Amend paragraph 13.5.8 as follows:</p> <p>The CfSH is a national standard for residential buildings that has been introduced by Government to drive a step change in sustainable building practice. The Government has started the implementation of a national programme to incorporate the standards into Building Regulations. Since this programme began, the government has announced the intention to abolish the Code for Sustainable Homes system in 2016.</p> <p>Amend Policy ECC SP2 as follows:</p> <ul style="list-style-type: none"> a. Achieve energy efficiency measures that reflect the standards in Part L of the Building Regulations (or any documentation which supersedes this), or the level of the Code for Sustainable Homes or appropriate BREEAM rating, applicable at the time of submission.
<p>Comments provided by the Ferring Conservation Society identified that a correction should be made to the table in the</p>	<p>Agree, amend Table 9.10. Also, amend where mention of the options both in the non-technical summary</p>	<p>See row below which shows amendments to Table 9.10 of the Sustainability Appraisal. Plus also where mention of the options both in</p>

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SA relating to Rustington/Ferring. The last two boxes on the first row of Table 9.10 need to be swapped.			<p>non-technical summary on p43 and the main report on p154, as below:</p> <p>“Option B –Accommodation in Western side of Ferring (to boundary with Worthing) of differing growth levels Option C – Accommodation in Eastern side of Ferring (to boundary with Worthing) of differing growth levels”</p>	
	Existing	Option A	Option B	Option C
Current Use		500-900 mixed residential units in Rustington	Approximately 600 mixed residential units sited on the eastern western side of Ferring	500-900 mixed residential units to be sited on the western eastern side of Ferring, to the border with Worthing