

Committee Manager: Carrie O'Connor (Ext 37614)

17 October 2014

LOCAL PLAN SUBCOMMITTEE

A meeting of the Local Plan Subcommittee will be held in the **Council Chamber, Bognor Regis Town Hall, Clarence Road, Bognor Regis** on **Thursday 30 October 2014 at 6.00 p.m.** and you are requested to attend.

Members: Councillors Haymes (Chairman), R Bower (Vice-Chairman), Bicknell, Brooks, Mrs Brown, Chapman, Charles, Cooper, Mrs Goad, Mrs Hall, Mrs Maconachie, McIntyre, Nash and Oppler.

A G E N D A

1. **APOLOGIES FOR ABSENCE**
2. **DECLARATIONS OF INTEREST**

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

You should declare your interest by stating:

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

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

3. **MINUTES**

To approve as a correct record the Minutes of the meeting held on 31 July 2014 (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 ARUN LOCAL PLAN UPDATE

This Local Plan Update report is divided into four sections as follows:

- Part A: An evidence base update which will present the Authorities Monitoring Report, Housing and Economic Land Availability Assessment, Housing Implementation Strategy, Transport Studies and the Employment and Enterprise Validation Study;
- Part B: Statutory assessments to support the Local Plan. These include the Equalities Impact Assessment and an assessment required under Section 17 of the Crime and Disorder Act (1998) as amended by the Police and Justice Act (2006);
- Part C: Presents a draft Duty to Cooperate report which will support the Local Plan. Presents a Mid-Sussex Memorandum of Understanding, an Officer's response to Crawley Borough Council's Duty to Cooperate Letter, and Lewes District Council Statement of Common Ground
- Part D: Responses to national and local consultation events.

Please note that the following background papers will be circulated under separate cover:-

Background Paper 7 – Arun Local Plan Draft Duty to Cooperate Statement
Background Paper 10 –Planning and Traveller Consultation

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

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

31 July 2014 at 6.00 p.m.

Present : Councillors Haymes (Chairman), Bower (Vice-Chairman), Bicknell, Brooks, Mrs Brown, Charles, Cooper, Mrs Goad, Mrs Hall, Mrs Maconachie, and Nash.

Councillor Dingemans and Maconachie were also present at the meeting.

10. Apologies for Absence

Apologies for absence had been received from Councillors Chapman and McIntyre.

11. Declarations of Interest

The Monitoring Officer has advised Members of interim arrangements to follow when making declarations of interest. They have been advised that for the reasons explained below, they should make their declarations on the same basis as the former Code of Conduct using the descriptions of Personal and Prejudicial Interests.

Reasons

- The Council has adopted the government's example for a new local code of conduct, but new policies and procedures relating to the new local code are yet to be considered and adopted.
- Members have not yet been trained on the provisions of the new local code of conduct.
- The definition of Pecuniary Interests is narrower than the definition of Prejudicial Interests so, by declaring a matter as a Prejudicial Interest, that will cover the requirement to declare a Pecuniary Interest in the same matter.

There were no declarations of interest made.

12. Minutes

In considering the Minutes of the meeting held on 27 March 2014, Councillor Mrs Goad referred to Minute 9, Local Development Scheme, particularly that, within the general discussion that had taken place on the item, she had sought reassurance that a full and comprehensive consultation

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would be undertaken with the Parish Councils and local residents with regard to the drawing up of Gypsy and Traveller Development Plan Documents (DPDs). That reassurance had been given at the meeting on 27 March and was now reaffirmed by the Head of Planning Policy & Conservation.

Councillor Charles also made comment in respect of Minute 8, Local Plan Update, insofar as the copy of the Minutes that he had requested still did not provide the evidence he was seeking of the decision of the Council to support work on Route D for the realignment of the A29. The Head of Planning Policy & Conservation advised that the report in today's agenda summarised the process of the evidence base for the A29 realignment. He also made it clear that the Plan was taken as a whole and not every single policy had an individual decision attached to it but, in relation to the A29, Route D had been the preferred route, as included in the draft Local Plan agreed by Full Council on 29 May 2013. West Sussex County Council, as the Highways Authority, would have the ultimate responsibility for delivering improvements to the A29.

The Minutes of the meeting held on 27 March 2014 were then approved as a correct record by the Subcommittee and signed by the Chairman.

13. Arun Local Plan – Remaining Sections Publication and Consultation on Behalf of Government

(During the course of consideration of this item, Councillor Bicknell declared a personal interest as an employee of Southern Water, which was mentioned within the document.)

The Head of Planning Policy & Conservation introduced the item by advising that, following publication of the majority of the Local Plan in February 2014, and agreement of the Council's Housing Strategy in April 2014, the remaining chapters of the Plan were being presented, together with amendments to the approved policies of the Plan and a number of associated documents that supported it and which would be submitted with the Local Plan to Government. He therefore requested the Subcommittee to recommend that Full Council agree these documents.

Additional papers had been circulated separately to the Agenda which detailed a schedule of changes to the policies approved in the February Local Plan. These largely reflected the Development Control team's advice when using the policies and to accommodate suggestions from the Council's consultants. Also included with that documentation, and for information only, were the results of the business survey on transport priorities.

The remaining chapters were made up of:-

- Spatial Portrait – outlining the characteristics of Arum
- Employment and Enterprise – making it clear that employment was central to the Local Plan both in job creation and skills

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- Transport – again making it clear that this Local Plan was also about tackling infrastructure deficit
- Housing Allocation – taking forward the principles of the Plan as a whole for sustainable development in the District
- Implementation- a section which referenced the types of infrastructure and services that would help achieve the Local Plan
- Monitoring – the framework for monitoring the Plan
- Key Diagram and Policies Maps – which were also on display at the meeting and in the Members' Room
- The Sustainability Appraisal of the Local Plan

The Chairman then took the Subcommittee through the schedule of changes and new chapters of the Local Plan page by page and invited Members to make any comments or amendments where relevant.

General discussion/comment/amendment took place around:-

The Local Plan Advisory Group Membership – advice was given that statutory agencies such as the Environment Agency, Highways Authority, Natural England, and adjoining local authorities were participants to help shape the policies going forward. Members were referred to the November 2011 and January 2012 Subcommittee meetings regarding the LPAG.

Employment and Enterprise – a question was asked about apprenticeships and the Assistant Director of Planning & Economic Regeneration advised that a report was in the process of being prepared to be presented to a future meeting of the relevant committee.

Spatial Portrait – Para 3.7 – reference was made to the “Six Villages” which included Westergate. – comment was made that this was inaccurate as Westergate was part of Aldingbourne. It was acknowledged that this was not a list of parishes but places and that there were different views. Aldingbourne and Westergate were two different communities; it was suggested that Aldingbourne with Westergate could be referred to.

Spatial Portrait – Para 3.19 – on the question being asked as to how this statistic had been calculated relating to people from other European countries making up 5% of the population of the District, it was stated that a written reply would be provided following the meeting.

Housing Delivery – Para 12.1.38 – a query was raised regarding the potential stopping up of the Woodgate crossing and advice was given that that was a matter for Network Rail.

Transport – Para 15.4.2 – Members participated in some discussion around the parking requirements in town centres and requested that the wording of this paragraph be amended and strengthened to reflect their views that there must be adequate parking provided otherwise the

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towns would die. The Head of Planning Policy & Conservation offered a form of words, which the Subcommittee agreed should be incorporated into the paragraph, as follows:-

“Where the loss of town centre car parking is proposed for regeneration projects, the impact upon parking provision and town centre accessibility for all modes of transport must be fully assessed and provision must be made to meet the anticipated demand for public parking spaces on the existing site or elsewhere in the locality.”

Infrastructure Provision & Infrastructure & Implementation – Para 22.1.8 – clarification was given that the Environment Agency had not completed their study of the Aldingbourne Rife.

Sustainability Appraisal – Para 5.24 – a query was raised regarding the potential loss of 150 jobs in Angmering and clarification was given that this part of the Sustainability Appraisal was the baseline and reflected the economic situation at the time of writing; the Monitoring Report would show how things were changed over the Plan period.

The Committee then turned to the recommendations and

RECOMMEND TO FULL COUNCIL – That

(1) the remaining sections of the Local Plan, the policies map and key diagram of the Local Plan be agreed;

(2) the schedule of changes to the Publication Version of the Local Plan (February 2014) be agreed

(3) the policies and maps presented at the meeting on 31 July 2014 are used as a material consideration by Development Control Committee for determining planning applications and that their use is monitored to determine if amendments need to be made to the policies before submission to Government;

(4) Any minor changes to these policies be delegated to the Assistant Director of Planning and Economic Regeneration, in consultation with the Cabinet Member for Planning and Infrastructure; and

(5) the Council publishes all sections and maps of the Local Plan and carries out a ‘soundness’ consultation, under Regulation 19 of the Town & Country Planning (Local Planning)(England) Regulation 2012 on behalf of Government and submits the Plan, its associated documents and the responses from the consultation to the Planning Inspectorate in order that an Examination in Public of the Plan can be held.

(The meeting concluded at 7.00 pm)

AGENDA ITEM NO _____.

ARUN DISTRICT COUNCIL

LOCAL PLAN SUB-COMMITTEE – 30 October 2014

Subject: Arun Local Plan Update

Report by : Simon Meecham
Report date : 15 October 2014

EXECUTIVE SUMMARY

This Local Plan Update report is divided into four sections as follows:

- Part A: An evidence base update which will present the Authorities Monitoring Report, Housing and Economic Land Availability Assessment, Housing Implementation Strategy, Transport Studies and the Employment and Enterprise Validation Study;
- Part B: Statutory assessments to support the Local Plan. These include the Equalities Impact Assessment and an assessment required under Section 17 of the Crime and Disorder Act (1998) as amended by the Police and Justice Act (2006);
- Part C: Presents a draft Duty to Cooperate report which will support the Local Plan. Presents a Mid-Sussex Memorandum of Understanding, an Officer's response to Crawley Borough Council's Duty to Cooperate Letter, and Lewes District Council Statement of Common Ground
- Part D: Responses to national and local consultation events.

RECOMMENDATIONS

Part A:

- That the Local Plan Sub-Committee recommends to Full Council that the Authorities Monitoring Report is agreed.
- That the Local Plan Sub-Committee recommends to Full Council that the updated sites within the Housing and Employment Land Availability Assessment are agreed and that the most up to date HELAA database is made available on the website.
- That the Local Plan Sub-Committee recommends that Full Council adopts the 2014-19 Housing Land Supply Assessment.
- That the Local Plan Sub-Committee recommends to Full Council that the Housing Implementation Strategy is agreed.

- That the Local Plan Sub-Committee note the evidence base updates provided for the Transport Studies and Employment and Enterprise Validation Study.

Part B:

- That the Local Plan Sub-Committee recommends to Full Council that the EqIA and the Section 17 report are agreed.

Part C:

- That the Local Plan Sub-Committee notes the progress made on the Draft Duty to Cooperate Statement being prepared to support the Local Plan.
- That the Local Plan Sub-Committee recommends to Full Council that the Duty to Cooperate Memorandum of Understanding with Mid Sussex District Council is agreed
- That the Local Plan Sub-Committee recommends to Full Council that the position set out in the officer's response to Crawley Borough Council's duty to cooperate letter is agreed.
- That the Local Plan Sub-Committee recommends to Full Council that the Lewes District Council Statement of Common Ground is agreed.

Part D:

- That the Local Plan Sub-Committee recommends to Full Council that the officer response to Crawley Borough Council's statutory submission consultation (1st September – 13th October 2014) is agreed. Any minor changes to be agreed by the Portfolio Holder and Assistant Director Planning and Economic Regeneration.
- That the Local Plan Sub-Committee recommends to Full Council that the officer response to the Government's proposed amendments to "Planning Policy for Traveller Sites" (March, 2012) is agreed. Any minor changes to be agreed by the Portfolio Holder and Assistant Director Planning and Economic Regeneration.

General:

- That any minor changes to documents in Parts A, B, C and D are delegated the Portfolio Holder for Planning and Infrastructure and the Assistant Director of Planning and Economic Regeneration.

1.0 INTRODUCTION

1.1 The Arun District Publication Version Local Plan (2011-2031) consultation will be commencing on 30th October until 5pm 11th December 2014. This report provides an update on items that have been completed (or completed in draft), ready for sign off and where further work is required in anticipation of the Local Plan's submission) including the following. This report includes:

- Authorities Monitoring Report
- Housing Land Supply Report

- Housing Implementation Strategy
- Transport Studies
- Employment Studies
- Equalities Impact Assessment
- Assessment of the Local Plan under Section 17 of the Crime and Disorder Act (1998) as amended by the Police and Justice Act (2006)
- Draft Duty to Co-operate Statement

1.2 It is a legal requirement of local planning authorities to meet the Duty to Cooperate. A Draft Duty to Cooperate Statement has been prepared to accompany the Local Plan. Furthermore, neighbouring local planning authorities have prepared a Memorandum of Understanding, a Statement of Common and a request for help with housing and employment growth. These are presented in this report.

1.3 Finally, this report presents officer comments on the Crawley Borough Council Local Plan consultation and a government Consultation on planning and travelers published by Department for Communities and Local Government in September 2014.

2.0 PART A: EVIDENCE BASE UPDATE

2.1 **The Authorities Monitoring Report**

2.2 The preparation of an Authorities Monitoring Report (AMR) is a requirement under Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The reports present data on an annual basis such as the progress being made on Development Plan Documents (DPD) within the local planning authorities Local Development Scheme; the use of planning policies and housing land supply figures.

2.3 The most up to date version of the AMR (based on the reporting year: 1st April 2013 and 31st March 2014), is attached to this report in **Background Paper 1**. The AMR, 2013/4 presents a range of data, in accordance with the regulations. In particular it includes a Housing Land Supply Report; an update on Local Plan and Neighbourhood Plan progress and housing delivery. There are parts of the AMR which are yet to be completed. This is due to the fact that certain data (for the reporting year) are not yet available from West Sussex County Council or the Sussex Biodiversity Centre.

2.4 **Housing and Economic Land Availability Assessment**

2.5 The National Planning Policy Framework (NPPF) sets out the approach to Strategic Housing Land Availability Assessment (SHLAA) studies as a basis for establishing a range of sites for consideration as potential locations for Local Plan allocations/supply. This Council comprehensively updated its SHLAA in 2012. In addition there has been an open 'call for sites' since then, to encourage sites to be brought forward for consideration. Some such sites were considered by the sub-committee at its meeting on 28th November 2013. This report includes sites submitted since then, as set out in **Background**

Paper 2 to this report, indicating whether or not each site has been included in the Housing Land Supply (HLS) for the Local Plan. Following government advice in the online Planning Practice Guidance (PPG), SHLAA sites have now been combined with employment sites in a comprehensive assessment of employment and housing sites, referred to as the Housing and Employment Land Availability Assessment (HELAA).

- 2.6 As Neighbourhood Plans (NPs) progress through the examination/adoption process, emerging sites can be considered for inclusion in the Housing Land Supply. **Background Paper 2** includes all housing sites in NPs that have passed examination, and in all cases they are being included in the Housing Land Supply for the Local Plan, with phasing of delivery partly reflecting the NP policy, and partly reflecting an assessment of deliverability.
- 2.7 It is anticipated that the HELAA, as discussed above will be made available on the ADC website, shortly.
- 2.8 **Housing Land Supply**
- 2.9 At paragraph 47, the NPPF requires all Local Planning Authorities to 'identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements...' . **Background Paper 3** provides an assessment for the period 2014-19, based on data from the WSCC Residential Land Availability data. The assessment identifies 5.33 years worth of supply to be available, so meeting the requirements of the NPPF.
- 2.10 **The Housing Implementation Strategy**
- 2.11 A draft Housing Implementation Strategy can be found in **Background Paper 4**
- 2.12 This Housing Implementation Strategy (HIS) has been prepared to support the Arun Local Plan housing policies. It has been published in a draft final format to accompany the Arun Local Plan 2011-2031 Publication Version which will be published on 30th October 2014 for a period of six weeks, ending on 11th December 2014
- 2.13 The requirement to provide a HIS is identified in the National Planning Policy Framework (NPPF) which states that local planning authorities should:

"for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target" (paragraph 47, 4th bullet point)

This Strategy sets out the Council's proposed approach to managing the delivery of housing over the Local Plan period to 2031, including market and affordable housing and housing for gypsies and travellers.

3.0 Transport Studies Update

- 3.1 In February 2014 the Council commissioned Systra to undertake three evidence base studies to underpin policies within the Local Plan and to provide further evidence with regard to the implications of the strategic waste sites, allocated within the West Sussex County Council Waste Local Plan (2014), upon the highway network.
- 3.2 The first study investigated the viability of the A29 route through the proposed strategic allocation at Barnham/Eastergate/Westergate. This report is now available on the Arun District Council's website.
- 3.3 The second report considered potential routes for a Felpham Link road connecting the A259 and the Bognor Regis Relief Road (BRRR), including an access for the former LEC Airfield site which is included as part of the strategic employment site allocation at Enterprise Bognor Regis. This report recommends that the most favourable route would connect the A259 to the south with the BRRR to the east of the railway line. This option is preferred by the consultants because it would result in less environmental impact; less traffic impacts and would cost significantly less. The final report is anticipated to be available on the ADC website by the committee date and a verbal update will be provided at the meeting.
- 3.4 The third report considered the impact of the strategic waste site allocations within the West Sussex Waste Local Plan. The report reinforces the findings of the strategic Transport Assessment prepared by consultants on behalf of West Sussex County Council in 2012. It also provides advice on likely mitigation required and where more detailed assessment should be undertaken. It is anticipated that by the committee date, the report will be available on the website.

3.5 Employment and Enterprise Validation Study

- 3.6 A report is being prepared for the Council by Nathaniel Lichfield & Partners ("NLP"). It has been commissioned in order to test and validate the robustness of the Local Plan with particular reference to the strategic employment allocations and supporting evidence base.
- 3.7 The core requirements are to:
1. Provide a review of the existing evidence and emerging policies for employment and strategic allocations in the Local Plan in light of the direction provided by the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG); and
 2. Undertake a partial technical updates to the evidence base following the recommendations of part 1 above.

- 3.8 This report is close to completion, subject to a number of concerns raised in relation to the quality of the monitoring data that informed the employment land supply position. To ensure due diligence, NLP are liaising with West Sussex County Council, that monitors commercial land supply across the County, to ensure the supply is correctly reported. This report will update the original study commissioned in 2010.

4.0 PART B: STATUTORY ASSESSMENTS TO SUPPORT THE LOCAL PLAN

Equalities Impact Assessment (EqIA) of the Arun District Publication Version Local Plan (2011 – 2031)

- 4.1 Equality Impact Assessments (EqIA) address a local authority's duty to carry out race, disability and gender impact assessments as required by the Equalities Act 2010. An EqIA of the Arun District Publication Version Local Plan (2011-2031) has been prepared to;
- Assess the impact of the policies within the plan upon specific groups of people who will be affected by the policies;
 - identify any inequalities people will experience if the policies are implemented;
 - identify ways to ensure the policies will not lead to inequalities;
 - increase transparency and accountability in the preparation of policy and;
 - develop better policy-making procedures.
- 4.2 The Planning Inspectorate's Soundness Guidance for Development Plan Documents (August 2009) identifies the Equality Impact Assessment as 'material necessary for the examination'. The EqIA is attached to this report as **Background Paper 5**.

Section 17 of the Crime and Disorder Act (1998) as amended by the Police and Justice Act (2006)

- 4.3 Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act (1998), as amended by the Police and Justice Act (2006), requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder.
- 4.4 The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation. An assessment of the Arun District Publication Version Local Plan (2011-2031) has been undertaken and accompanies this report within **Background Paper 6**. The Section 17 report was discussed at the Safer Arun Partnership of 1st September 2014 and was agreed.

5.0 PART C: DUTY TO COOPERATE

5.1 **Draft Duty to Cooperate Statement**

5.2 Local Planning Authorities (LPAs) are required under Section 110 of the Localism Act (Annex 6, Ref 1.3) to engage with relevant local authorities and specified bodies on strategic matters through the preparation of development plan documents (DPDs) and other activities in connection with strategic matters which affect more than one area. Engagement on strategic matters should be *active, constructive and ongoing* throughout the plan preparation process and beyond into delivery and review, and should aim to maximise the effectiveness of cooperation on the local plan policies.

5.3 In order for a Planning Inspector to be assured that the Arun Local Plan has been prepared in accordance with the Duty to Cooperate, Arun District Council must provide evidence to demonstrate how it has met the legal requirements of the Duty to Co-operate and effectively addressed strategic matters in the plan. The National Planning Policy Framework (Annex 6, Ref 1.1) provides amplification as to what issues are likely to require strategic cooperation. It states that '*Local planning authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*' [Paragraph 81]. The National Planning Practice Guidance (Annex 6, Ref 1.2) provides further advice on meeting the legal requirements of the Duty.

5.4 A Draft Duty to Cooperate Statement is being finalized and will be provided in advance of the meeting as **Background Paper 7** to this report. It summarises the strategic activities of Arun District Council and the outcomes in terms of impact on the local plan. This statement will be completed following the consultation on the Publication Version of the Arun Local Plan (2011-2031) and will form part of the evidence base used to underpin the Local Plan policies.

5.5 **Response to Duty to Cooperate Correspondence from neighbouring/'relevant' authorities.**

5.6 As mentioned above, it is a legal requirement for local authorities to engage with relevant local authorities and specified bodies on strategic matters which affect more than one area. It is important that this engagement is *active, constructive and ongoing* throughout the plan preparation process and beyond into delivery and review, and should aim to maximise the effectiveness of cooperation on the local plan policies.

- 5.7 As part of this engagement process, a number of local planning authorities have prepared Memorandum of Understanding, Statements of Common Ground or have written to ask that an agreed approach can be taken on strategic matters. These agreements show the agreed aims shared between the authorities and any actions to be taken by each authority. They are useful in terms of showing outcomes to co-operation over issues that are common to each authority and extend beyond individual authorities.
- 5.8 The following documents are attached to this report (within **Background Paper 8**) for consideration by the Sub-Committee:
- a) Mid-Sussex Memorandum of Understanding
 - b) An Officer's response to Crawley Borough Council's Duty to Cooperate Letter
 - c) Lewes District Council Statement of Common Ground

6.0 PART D: CONSULTATION RESPONSES

6.1 **Crawley Borough Council's statutory submission consultation**

- 6.2 The Council was consulted on the Crawley Submission Consultation Draft Local Plan from 1st September until 13th October. This formed the Regulation 19 stage, being the last consultation on behalf of the Planning Inspectorate before submission for Examination in Public. The suggested response for consideration is attached within **Background Paper 9**. If agreed these will be sent for consideration by the Inspector.

6.3 **Consultation: Planning and Travellers**

- 6.4 The Department for Communities and Local Government (DCLG) have published a consultation on proposed changes to Planning Policy for Traveller Sites. (The consultation document can be found at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/355840/current_con_doc_in_publication_format_140917.pdf)

- 6.5 The consultation document proposes to:
- Amend the definition of travellers as follows:
 - *Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily ~~or permanently~~, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*
 - Increased protection for the Green Belt, areas protected under the Birds and Habitats Directives and/or sites of special scientific interest, local green space, AONB and National Parks
 - Address unauthorised occupation of land by requiring that intentional unauthorised occupation should be regarded by decision takers as a material consideration that weighs against the grant of permission.

- Introduce draft planning guidance for travellers to assist with the assessment of traveller accommodation needs.

6.5 The DCLG consultation paper and a proposed response to this consultation is currently being prepared and will be provided in advance of this meeting, as **Background Paper 10** to this report.

6.6 The consultation will end on the 23rd November 2014

BACKGROUND PAPERS:

- Background Paper 1: Authorities Monitoring Report.
- Background Paper 2: HELAA Sites identified and to be added for further consideration.
- Background Paper 3: Housing Land Supply Report
- Background Paper 4: Housing Implementation Strategy
- Background Paper 5: EqIA for Arun District Publication Version Local Plan (2011-2031).
- Background Paper 6: Section 17 of the Crime and Disorder Act as amended by the Police and Justice Act (2006) Assessment of the Arun Local Plan (2011-2031) Publication Version.
- Background Paper 7: Arun Local Plan .Draft Duty to Cooperate Statement*
- Background Paper 8: Duty to Cooperate Correspondence
- Background Paper 9: Response to Crawley Submission Local Plan
- Background Paper 10: Consultation: Planning and Travellers*

*__Currently being prepared and will be provided in advance of this meeting

Contact: Simon.Meecham@arun.gov.uk

Background Paper 1: Authority Monitoring Report



Arun District Council

Authority Monitoring report 1st April 2013 – 31st March 2014



October 2014

Contents

Chapter 1: Local Plan Update

- The Local Development Scheme
- The Local Plan
- Gypsy and Traveller Site Allocations Development Plan Document
- Littlehampton Economic Growth Area including West Bank Area Action Plan (AAP) and Site Specific Allocation DPD(s) for Ford and Fontwell

Chapter 2: Neighbourhood Plan Update

- Introduction
- Progress on Neighbourhood Plans to date
- Conclusion

Chapter 3: Duty to Co-operate Update

Chapter 4: Housing Land Supply (will be added – elsewhere on the agenda)

Chapter 5: New Local Plan Policy Usage Data

Chapter 6: Housing Delivery

Chapter 7: Commercial Land Delivery (will be added)

Chapter 8: Gypsy and Traveller Sites

Chapter 9: Sussex Bio Diversity Report (will be added)

Chapter 1

Annual Monitoring Report 2013/14

The Local Development Scheme 2014 – 2017 was approved by Full Council in July 2014. The Scheme specifies that Arun District Council will be preparing the following Development Plan Documents:

1. The Local Plan
2. Gypsy and Traveller Site Allocations Development Plan Document
3. Littlehampton Economic Growth Area including West Bank Area Action Plan (AAP)
4. Site Specific Allocation DPD(s) for Ford and Fontwell

The following provides an overview of the Local Plan and development plan documents as well as a timetable for the documents' preparation. This will include the stage the document has reached in its preparation and whether the document is meeting the timetable within the most up to date Local Development Scheme.

1. The Local Plan

- 1.1 As set out in the LDS (2011-2014), the council is currently preparing the Arun Local Plan which will bring the strategic, development management and site allocations policies together into one development plan document (DPD).
- 1.2 The Draft Local Plan was consulted on between July and September 2012 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This milestone complied with the LDS 2011-2014 timetable. However, following this consultation stage, it became apparent that the work required to address the responses received would have an impact upon the timetable for the Local Plan. In addition, further work to achieve a robust and up to date evidence base was required.
- 1.3 Together, these factors resulted in a revised timetable being taken to the Local Plan sub-committee on 13th November 2012. The revised timetable was subsequently agreed by Full Council on 9th January 2013 and included the following key milestones:
 - May 2013 - Pre-Submission Consultation
 - September 2013 – Submit Local Plan to Secretary of State
- 1.4 Work commenced in line with the revised timetable and a revised LDS was prepared alongside the proposed Pre-Submission (Publication) Local Plan. However, on the 29th May 2013 a Full Council Special Meeting to authorise the Pre-Submission Local Plan for Public consultation, resulted in members requesting several changes

including the reassessment of the supporting Strategic Housing Market Assessment (SHMA) data and further consideration of strategic sites. This meant that, the Local Plan preparation process would not meet with the updated timetable agreed by Full Council on 9th January 2013 and, further timetable revisions would be required.

1.5 Full Council subsequently agreed an approach regarding the SHMA and Arun's residual housing requirement on the 8th January 2014 and the Council resolved, on the 30th April 2014 that:

1) the following strategic locations should be taken forward as part of the current Local Plan:

- a) Barnham/Eastergate/Westergate (BEW) – 2,000
- b) Angmering – 600

2) Westbank is taken forward as an Area Action Plan – Development Plan Document to deliver up to 1,000 homes and Ford and Fontwell are considered as site specific development plan document.

1.6 Details regarding each of these site specific Development Plan Documents to be prepared as a result of the Full Council resolution are provide below.

1.7 An up to date timetable for the preparation of the Local Plan is set out below. The timetable provided in the Table is currently being met with the Publication Version of the Local Plan consultation commencing on 30th October 2014 and ending on 11th December 2014.

LOCAL PLAN AND POLICIES MAPS TIMETABLE FOR PRODUCTION		
	Prepare Draft Local Plan	November 2011 – May 2012
	Regulation 18 consultation	19 th July – 10 th September 2012
	Pre-Submission publication. Regulation 19	October 2014 – December 2014
	Submission	January 2015
	Examination	April/May* 2015
	Inspector's Report received	August* 2015
	Adoption	September* 2015
Policies Map	The Policies Map will be updated when the Local Plan is adopted. Proposed changes will be set out during the consultation on the publication of the Local Plan.	
*These dates are subject to the PINS hearing process.		

2. Gypsy and Traveller Site Allocations Development Plan Document

- 2.1 The LDS 2011-2014 explains that the Local Plan will include site allocations, development management policies and gypsy and traveller policies. However, the Draft Local Plan published for consultation in July 2012 provides an overview of the status of the evidence base including the Gypsy and Traveller Accommodation Assessment and Sites Study. It explains that it was considered appropriate and in accordance with national planning guidance that ADC would work with the coastal West Sussex authorities (Worthing Borough and Adur District and Chichester District), the South Downs National Park Authority and West Sussex County Council to develop a joint evidence base.
- 2.2 At the time of preparing the joint evidence base, it was identified that the results of this work would not fit with the preparation timetable for the Local Plan. Therefore, the Publication Version of the Local Plan 2011-2031 states that the Council proposes to prepare a separate DPD for traveller accommodation. This remains the case as further work is required to complete the jointly commissioned GTAA as well as undertake further local evidence gathering as part of a site assessment exercise.
- 2.3 It is important however, that the Gypsy and Traveller Sites Allocation DPD is prepared alongside, or closely following the Local Plan DPD to ensure that it meets the requirements of the Planning for Traveller Sites Policy (March 2012). Further details regarding the timetable for the preparation of this DPD is provided below. It should be noted that the preparation of the DPD is currently on track to undergo its first round of consultation next summer.

Gypsy and Traveller Sites DPD		
Timetable	Regulation 18 consultation	Summer 2015
	Pre-Submission publication. Regulation 19	Spring 2016
	Submission	Autumn 2016
	Examination	Spring 2017
	Inspector's Report received	Summer 2017
	Adoption	Summer 2017
Review	Once the Gypsy and Traveller Sites DPD is adopted, the policy and delivery strategy will be monitored annually in the Authority Monitoring Report	

3. Littlehampton Economic Growth Area including West Bank Area Action Plan (AAP) and Site Specific Allocation DPD(s) for Ford and Fontwell

3.1 As mentioned above, Full Council agreed on 30th April 2014 that the following Development Plan Documents and Area Action Plan will be prepared separately in order to build upon the policies set out in the Local Plan:

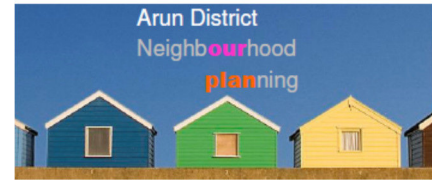
- Littlehampton Economic Growth Area including West Bank Area Action Plan (AAP)
- Site Specific Allocation DPD(s) for Ford and Fontwell

3.2 Formal work on these DPDs need not commence until years 6-10 post adoption of the Local Plan. However, discussions can take place on these areas not least in terms of the alternative option of preparing these through Neighbourhood Development Plan processes.

3.3 Timetables for the preparation of these DPD are provided below:

Littlehampton Economic Growth Area including West Bank Area Action Plan		
Timetable	Regulation 18 consultation	Winter 2016
	Pre-Submission publication. Regulation 19	Autumn 2017
	Submission	Winter 2018
	Examination	Spring/Summer 2018
	Inspector's Report received	Autumn/Winter 2018
	Adoption	Winter 2018/19
Review	Once the West Bank Area Action Plan is adopted, the policy and delivery strategy will be monitored in the Authority Monitoring Report	

Site Specific Allocations Development Plan Document(s)		
Timetable	Regulation 18 consultation	Autumn/Winter 2017
	Pre-Submission publication. Regulation 19	Autumn 2018
	Submission	
	Examination	Winter 2018/19
	Inspector's Report received	Summer 2019
	Adoption	Winter 2019/20
		Winter 2020
Review	Once the site specific allocations at Ford and Fontwell are adopted, the policy and delivery strategy will be monitored in the Authority Monitoring Report	



Chapter 2

Arun District Council AMR on Neighbourhood Development Plan

Prepared by: Donna Moles (ADC Neighbourhood Development Plan Officer)

29th September 2014

1.0 INTRODUCTION

- 1.1 Under the Town and Country Planning Act 1990 (as amended), the Council has a statutory duty to assist communities in the preparation of neighbourhood development plans and orders and to take plans through a process of examination and referendum.

Neighbourhood Development Plan is a plan that can set out where development will go and what development could look like in a particular area. The production of a Plan will be led by Parish or Town Councils but it needs the involvement of the local community.

A Neighbourhood Development Plan will be used by Arun District Council to help make decisions on planning applications received for the area covered. A Neighbourhood Development Plan will form part of the Planning Framework for the District and sit alongside the Local Plan which Arun is producing that sets out policies and proposals to do with strategic issues.

The Localism Act 2011 (Part 6 chapter 3) sets out the LPA responsibilities as:

- Designating a forum
- Designating the area of the Neighbourhood Development Plan (NDP)
- Advising or assisting communities in the preparation of a neighbourhood plan
- Checking a submitted plan meets the legal requirements
- Arranging for the independent examination of the plan
- Following the examination, determining whether the neighbourhood plan meets the basic conditions and other legal requirements in the examiner's report through a decision statement
- Subject to the results of the referendum/s , the plan is to be 'made'

In addition legislation sets out who the relevant councils are with responsibility for arranging the referendums 1990 Act Schedule 4B para 3 states:

“A local planning authority (LPA) must give such advice or assistance to qualifying bodies as, in all the circumstances, they consider appropriate for the purpose of, or in connection with, facilitating the making of proposals for NDPs in relation to neighbourhood areas within their area”.

This applies to NDP's through S38A of the Planning and Compulsory Purchase Act 2004. There is no requirement to give financial assistance.

- 1.2 The level of interest in neighbourhood planning in Arun District Council remains solid. There are currently 17 Plans being undertaken; all of which are led by a Parish/ Town Councils or a sub group of the Parish / Town Council and include the following Parish areas:

Area Designation Approved

1. Angmering
2. Arundel
3. Barnham & Eastergate
4. Bersted
5. Bognor Regis
6. Climping
7. East Preston
8. Felpham
9. Ferring
10. Kingston
11. Littlehampton
12. Pagham
13. Walberton
14. Yapton
15. Aldingbourne
16. Rustington
17. Ford

- 1.3 There are also 3 Community Right to Build Orders (CRTBOs) being proposed by Ferring. The Community Right to Build Order (CRTBO) is a particular type of neighbourhood development order, meaning that it allows people to propose a development in their local area and obtain permission for it, without having to go through a lengthy and cumbersome planning process. A proposal can be developed as part of a full neighbourhood planning process, or on its own.

The statutory process is very similar to a Neighbourhood Development plan and therefore has a referendum after the examination

- 1.4 The majority of Neighbourhood Development Plans being produced have established Steering Groups and/ or Working Groups to progress their Neighbourhood Plan.
- 1.5 A number of Parish Councils have appointed Action in Rural Sussex and/or rCOH Ltd to help in producing their Neighbourhood Development Plan (NDP). There is also government funding and support through Locality.

- 1.6 Neighbourhood Planning has picked up momentum very rapidly in Arun District Council and we have the first made plan in Sussex and amongst the first ten in the country. We also have the first 3 CRTBOs to pass examination in the country.
- 1.7 Arun District Council currently has the most successful examinations record in the country to date.

2.0 PROGRESS ON NEIGHBOURHOOD PLANS TO DATE

- 2.1 The following submissions have been received to date:

Made Plans

After successful referendum the plan is brought into legal force ('made'), and forms part of the statutory Development Plan for the area. Consequently, decisions on whether or not to grant planning permission in that area will need to be made in accordance with the NDP, unless material considerations indicate otherwise.

- Arundel plan was 'made' on 30th April 2014 and was the first made NDP in Sussex
- Felpham plan was 'made' on 16th July 2014.
- Barnham and Eastergate plan was 'made' on 16th July 2014 and was the first joint plan to be made in Sussex.

Successful NDP independent examinations

1. Arundel
2. Littlehampton
3. Felpham
4. Barnham and Eastergate
5. Bersted
6. Ferring
7. Yapton
8. Rustington
9. East Preston

Successful CRTBO independent examinations

1. Ferring CRTBO 1
2. Ferring CRTBO 2
3. Ferring CRTBO 3

Currently at Pre-submission stage (Reg.14)

1. Angmering
2. Kingston
3. Pagham

Currently working on draft

1. Aldingbourne
2. Bognor Regis
3. Climping

3.0 CONCLUSION

- 3.1 A Neighbourhood Development Plan (NDP) will be used by Arun District Council to help make decisions on planning applications received for the area covered. An NDP will form part of the Development Plan for the District and sit alongside the Local Plan which Arun is producing that sets out policies and proposals.

Chapter 3

Duty to Cooperate

As of March 2012, as required by the Localism Act 2011, public bodies have a duty to cooperate on planning issues that cross administrative boundaries. Local authorities are expected to demonstrate evidence of having co-operated with a range of bodies prescribed by the regulations where it is appropriate to do so in order to enable the delivery of sustainable development. Furthermore, local authorities are expected to document the outcome of such co-operation and to identify any unresolved issues.

Since March 2012, and in accordance with regulations set out in the Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (paragraphs 156, 178 – 181), the Council has sought to work collaboratively with other bodies to ensure that endeavours to deliver strategic priorities across local boundaries is properly co-ordinated and that shared goals are reflected in the Council's Draft Local Plan.

During this report year, from the 1st April 2013 to 31st March 2014 the Council has:

- Jointly, with the authorities constituting Sussex Coast Housing Market Area, commissioned two evidence studies relating to housing need, to ensure that Local Plans are based on the most up to date information and show that the methodology set out in the Planning Practice Guidance has been used.
- Finished and published a joint report for Coastal West Sussex on Gypsy and Traveller and Travelling Showpeople Accommodation Assessment in April 2013 and a Gypsy and Traveller and Travelling Showpeople Sites Study in September 2013.
- Led on the production of the Coastal West Sussex and Greater Brighton Local Strategic Statement (LSS), outlining the strategic direction for the wider partnership area and identifies specific strategic and spatial priorities. Consultation and adoption of the document in January 2014.
- As part of the Coastal West Sussex and Greater Brighton partnership created a Planning Officer Group to work together on projects. This Officer Group supports the Board's work programme.
- Consulted with the Arun Local Plan Advisory Group, during both March-April 2013 and December 2013, on the iterations of the Arun Local Plan 2011-2031. In addition, as necessary there have also been specific follow up meetings with a number of the statutory consultees, to further discuss alterations to the content of the Local Plan to address any issues raised.

In addition, since 1st April 2014, the following actions have also been agreed in taking work at a wider level forward:

1. Signed Memorandum of Understanding with Mid Sussex District Council;
2. The first Monitoring Report for the LSS is being collated
3. Joint commissioning, as part of Coastal West Sussex and Greater Brighton partnership: on studies relating to:
 - Transport;
 - Economy; and
 - Demographics to update Objectively Assessed Need for Housing;
4. Collaboration has been established with the Greater Brighton Economic Board and an application by Mid Sussex District Council to join the CWS and GB Board was considered in October 2014
5. Issued a Draft Duty to Co-operate Statement to accompany the Pre-Submission consultation on the Arun Local Plan 2011-2031 Publication Version.

Chapter 4

This section appears in the HLS Part of this Agenda and will be added here when agreed.

Chapter 5

Local Plan Policy Usage Data from Feb 2014 to March 31st 2014

The Table below shows the new policies active from February 2014 and the number of times these policies have been recorded against a planning application

Policy Description	Total	Approve	Refuse	Appealed	Dismissed	Upheld
C SP1 Countryside	6	4	2	1		
D DM1 Aspects of Form and Quality	68	55	13	3		
D DM2 Internal Space Standards	13	6	7	2		
D DM3 External Space Standards	9	5	4	None		
D DM4 Extensions & Alterations to Existing Buildings	47	42	5	None		
DM 5 Renewable Energy	1	1	None	None		
D SP1 Design	14	9	5	2		
ECC DM1 Renewable Energy	3	2	1	1		
ECC SP1 Adapting to Climate Change	1	None	1	1		
ECC SP2 Energy & Climate Change Mitigation	1	None	1	1		
ENV SP1 Natural Environment	1	None	1	1		
ENV DM4 Protection of Trees	1	None	1	1		
ENV DM5 Development and Biodiversity	1	None	1	1		
GI SP1 Green Infrastructure & Development	1	None	1	1		
H DM1 Housing Mix	4	2	2	1		
H DM2 Independent Living & Care Homes	1	1	None	None		
H DM3 Agricultural, Forestry & Horticultural Workers' Dwelling	1	None	1	None		
HER DM1 Listed Buildings	7	5	2	1		
HER DM3 Conservation Areas	11	7	4	1		
HER DM6 Sites of Archaeological Interest	2	1	1	1		
HER SP1 The Historic Environment	5	3	2	1		
H SP2 Affordable Housing	3	1	2	2		
HWB SP1 Health & Wellbeing	1	None	1	None		
LAN DM1 Protection of Landscape Character	1	None	1	None		
LAN DM2 The Setting of Arundel	1	None	1	None		
NR DM1 Natural Resources & Minerals Safeguarding	1	None	1	None		
OSR DM1 Open Space, Sport & Recreation	1	None	1	None		
QE DM1 Noise Pollution	3	1	2	1		
QE DM2 Light Pollution	2	1	1	1		
QE DM3 Air Pollution	1	None	1	None		
QE SP1 Quality of the Environment	2	1	1	1		
RET SP1 Hierarchy of Centres	1	None	1	None		
SD SP1 Sustainable Development	3	1	2	1		
SD SP2 Built-Up Area Boundary	27	24	3	2		
SO DM1 Soils	1	None	1	None		
TOU DM1 Tourism Related Development	2	2	None	None		
TOU SP1 Sustainable Tourism & The Visitor Economy	1	1	None	None		
W DM1 Water Supply & Quality	2	None	2	None		
W DM2 Flood Risk	1	None	1	None		
W DM3 Sustainable Urban Drainage Systems	1	None	1	None		

Chapter 6

Housing Delivery

The table below shows the planned housing targets to 2029 (Subject to agreement by full Council in January 2014)

H1: Plan Period and Housing Target

H1 Plan period and Housing Targets		
Housing target		2013 - 2029
		580

The table below shows the results for dwellings delivered and brownfield total with percentage of the gross delivered, the data shows a reduction in additional dwellings on brownfield sites

H2(a): Net Additional Dwellings – In Previous Years

H2(b): Net Additional Dwellings – for the Reporting Year (Financial)

H3: New and Converted dwellings – On Previously Developed Land

H2(a),H2(b) and H3 Indicators		H2 (a&b)	H3
Year	Dwelling Completions		Brownfield Total
	Gross	Net	(Included in Gross Completions)
2006-07	366	320	295 (81%)
2007-08	637	591	517 (81%)
2008-09	587	548	366 (62%)
2009-10	448	416	360 (81)
2010-11	570	519	371 (65%)
2011-12	745	723	378 (51%)
2012-13	491	475	136 (28%)
2013-14	397	367	210 (53%)
Total	4,241	3,959	2,633 (62%)

H2 (c & D) on the next page show net additional dwellings – in future years (including NI59) and the managed delivery target respectively

The table below shows the additional dwellings delivered by Parish/Ward showing most of the gains were in Bersted, Felpham and Pevensey Ward

Summary of Gross dwellings delivered by Ward/Parish

Arun District Ward/Parish	Gross Dwelling Completions 2013/14
Aldingbourne	6
Aldwick East Ward	6

Aldwick West Ward	0
Angmering	12
Arundel	5
Barnham	0
Beach Ward	0
Bersted	68
Burpham	1
Central Ward	1
Clapham	1
Climping	0
East Preston	14
Eastergate	7
Felpham East Ward	74
Felpham West Ward	13
Ferring	5
Findon	7
Ford	0
Ham Ward	2
Hotham Ward	15
Houghton	0
Kingston	1
Lyminster	2
Madehurst	0
Marine Ward	28
Middleton on Sea	4
Orchard Ward	5
Pagham	5
Patching	0
Pevensey Ward	79
Poling	0
River Ward	2
Rustington	4
Slindon	1
Southwater	0
Walberton	0
Wick	26
Yapton	3
Grand Total	397

The table below shows the total affordable housing completions

H5: Gross Affordable Housing Completions

Area Name	Sum Built	Sum Lost
Pevensey Ward	29	0
Wick	1	0

Total	30	0
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The table below shows the affordable homes delivered, the total homes delivered and what the affordable homes total is as a percentage of total dwellings delivered

Affordable Dwellings Delivered and Total Dwellings delivered

Year Ended	Affordable dwellings	Total dwellings	% of Total Dwellings
31st March 2007	14	366	4%
31st March 2008	53	637	8%
31st March 2009	147	587	25%
31st March 2010	67	448	15%
31st March 2011	196	570	34%
31st March 2012	280	745	38%
31st March 2013	164	499	33%
31st March 2014	30	397	8%

Chapter 7

Commercial Delivery

Awaiting Data from County

Chapter 8

Gypsy and Traveller and Travelling Showpeople

Planning Policy for Traveller Sites (PPTS) was published in March 2012 and requires that local planning authorities set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning

authorities. Using the target figures, the PPTS requires that local planning authorities identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites.

The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) was commissioned jointly by Arun District Council, Adur District and Worthing Borough Councils, Chichester District Council and the South Downs National Park Authority. The GTAA was published in April 2013 and is available on the Arun District Council website. The GTAA identifies pitch and plot targets for gypsies and travellers and travelling showpeople respectively. It should be noted that the baseline data and targets set in the GTAA for Arun District only cover the local planning authority area of the district and excludes that part of the District within the South Downs National Park Authority.

The targets for Gypsies and Travellers are separated into public and private in order to ensure that the range of accommodation needs for that community can be met through the planning process. Tables 1 and 2 below set out the needs identified for Gypsies and Travellers and Travelling Showpeople in Arun. Table 3 and Table 4 provide an overview of the number of plots and pitches permitted at the time of the preparation of the GTAA (April, 2013) and Table 5 and Table 6 provide an updated figure as of September 2014.

Table 1

Extra Pitch Provision in Sussex Coastal by Planning Authority by Public and Private Sites (GTAA, 2013)					
ARUN					
2012-2017		2018-2022		2023-2027	
Public	Private/New traveller	Public	Private/New traveller	Public	Private/New traveller
10	2	1	2	1	2

Table 2

Extra pitch Provision for travelling showpeople (GTAA, 2013)		
2012-2017	2018-2022	2023-2027
5	1	1

Table 3

Existing Authorised Gypsy and Traveller Sites in Arun (GTAA, 2013)				
Site No	Site Name	Settlement	Planning Status	Pitches
ARU030	Ryebank Caravan Park	Middleton	Public site with permission	12 Permanent Pitches
ARU031	Fieldview, Junction Commonmead Lane/Pagham Road	Pagham	Private site with permission	2 Permanent Pitches in Total - P/2/86 1 Permanent Pitch - P/113/07 1 permanent Pitch (P/70/12 1 Permanent Pitch - Awaiting Appeal Decision)
ARU040	The Old Stables, Brook Lane / Penfold Lane, Rustington	Rustington	Private site with personal permission	2 Pitches (Personal Permissions)
ARU044	2 Wyndham Acres, Northfields Lane	Aldingbourne	Private site with permission	1 Pitch
ARU045	The Paddocks, Northfields Lane	Aldingbourne	Private site with permission	4 Permanent Pitches
ARU049	Land at Limmer Pond Stables, Church Road	Aldingbourne	Private site with permission	1 Permanent Pitch
ARU051	Dragonfly, Eastergate Lane	Walberton	Private site with personal permission	1 Permitted Pitch (Personal Permission)
ARU052	The Cottage Piggeries, Church Lane	Barnham	Private site with permission	1 Permanent Pitch
			Total	24

Table 4

Existing Travelling Showpeople Sites in Arun (GTAA, 2013)				
Site No	Site Name	Settlement	Planning Status	Plots
ARU022	The Drive, Eastergate Lane	Fontwell	Private site with permission	5 Plots
ARU023	Fairfield, Eastergate Lane	Fontwell	Private site with permission	1 Plot (Permanent Dwelling Built)
ARU046	Nyton Stables, Nyton Road	Aldingbourne	Private site with temporary permission	3 Temporary plots
ARU054	The Old Barns, Arundel Road	Fontwell	Private site with permission	1 Permanent Plots and Storage of 2 Caravans
			Total	10

Table 5

Current Authorised Gypsy and Traveller Sites in Arun September 2014				
Site No	Site Name	Settlement	Planning Status	Pitches
ARU030	Ryebank Caravan Park	Middleton	Public site with permission	12 Permanent Pitches
ARU031	Fieldview, Junction Commonmead Lane/Pagham Road	Pagham	Private site with permission	3 Permanent Pitches in Total - P/2/86 1 Permanent Pitch - P/113/07 1 permanent Pitch - (P/70/12 1 Permanent Pitch - Granted on Appeal)
ARU040	The Old Stables, Brook Lane / Penfold Lane, Rustington	Rustington	Private site with personal permission	2 Pitches (Personal Permissions)
ARU044	2 Wyndham Acres, Northfields Lane	Aldingbourne	Private site with permission	No Longer A GTS - Certificate of Lawfulness for an existing use as a single dwelling house Granted AL/98/13/CLE
ARU045	The Paddocks, Northfields Lane	Aldingbourne	Private site with permission	5 Permanent Pitches
ARU049	Land at Limmer Pond Stables, Church Road	Aldingbourne	Private site with permission	1 Permanent Pitch
ARU051	Dragonfly, Eastergate Lane	Walberton	Private site with personal permission	1 Permitted Pitch (Personal Permission)
ARU052	The Cottage Piggeries, Church Lane	Barnham	Private site with permission	1 Permanent Pitch
			Total	26
			Gross Gain	2
			Net gain	1

Table 6

Current Status Travelling Showpeople Sites in Arun September 2014				
ARUN				
Site No	Site Name	Settlement	Planning Status	Plots
ARU022	The Drive, Eastergate Lane	Fontwell	Private site with permission	5 Plots
ARU023	Fairfield, Eastergate Lane	Fontwell	Private site with permission	1 Plot (Permanent Dwelling Built)
ARU046	Nyton Stables, Nyton Road	Aldingbourne	Private site with temporary permission	3 Temporary plots made permanent - AL/10/14
ARU054	The Old Barns, Arundel Road	Fontwell	Private site with permission	2 Permanent Plots and Storage of 2 Caravans - AL/50/13
AL/47/14/PL	Land at Aldingbourne Farm Shop	Aldingbourne	Private site with permission	4 Permanent Plots
			Total	15
			Gross Gain	5
			Net Gain	8 (3 Temporary plots made permanent - AL/10/14 these count as Net Gains)

A review of the most up to date data from planning applications permitted/refused since the GTAA was published in 2013 shows that the plot targets for Travelling Showpeople (identified in the GTAA, 2013) have been met. This is due to the fact that 3 temporary permissions have been made permanent AL/10/14, 4 plots were permitted on 2nd September 2014 and 1 Plot permitted on 12th June 2013. For Gypsies and Travellers there is a net gain of 1 pitch since April 2013. These figures will need to be reviewed and reassessed against an up to date evidence base to support the preparation of a Gypsy and Traveller Sites Allocation DPD, which is scheduled to be prepared from summer 2015. The Council will monitor the supply of sites to identify whether a five year supply is provided, on an annual basis through the Annual Monitoring Report.

Chapter 9

Sussex Biodiversity Report

Awaiting Report from Sussex Biodiversity Report Centre

Background Paper 2: HELAA Sites

Appendix A – HELAA (SHLAA) sites submitted since previous LPSC SHLAA update (November 2013), and sites in examined NPs

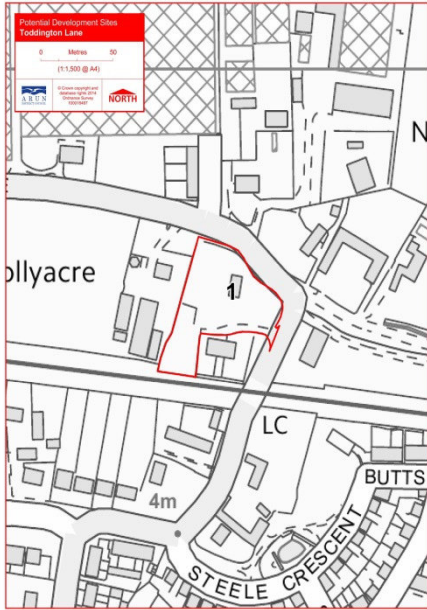
Site nos	Site Address	Comments	Included in Local Plan HLS?
HELAA/SHLAA sites			
1	Land at Toddington Farm	This is within the Local Plan allocation for Toddington. The SHLAA submission refers to a capacity of 12 dwellings and the intention of the owner to submit an application in the near future. This is a small site with no infrastructure constraints, and should pose no difficulties in being delivered by 2018.	Yes
2	Toddington nurseries - island site	This is within the local plan allocation for Toddington, but is not included in the area for which planning permission has been granted. It is in multiple ownerships, and there are no active proposals to bring the site forward. However, it is a site with potential within the built up area, so can reasonably be included in the Housing Land Supply for the District in the later plan period (ie 2025-31). The site is considered to provide a capacity of c200 dwellings	Yes
3	Land between New Place Bungalow and Arundel Rd, Angmering	The submission suggests 20 dwellings on this site of 0.65Ha, and refers to a certificate of lawful sue for storage and commercial use of part of the site. Comprehensive planning assessment not undertaken, but site is outside the built up area boundary, and not identified in draft Angmering Neighbourhood Plan for development. Development would not be acceptable in Publication Version Local Plan policy terms, as well as any traffic, landscape, heritage/biodiversity or other constraints which might be identified.	No
4	Shripney Lane	The submission suggests 15-20 dwellings on this site. Comprehensive planning assessment not been undertaken, but the site is outside the built up area boundary. Development	No

Site nos	Site Address	Comments	Included in Local Plan HLS?
		would not be acceptable in Publication Version Local Plan policy terms, as well as any traffic, landscape, heritage/biodiversity or other constraints that might be identified.	
5	Manor nursery, Angmering	32 dwellings subject to a planning application in the strategic allocation, shortly to be considered by the planning committee – recommended for approval	Yes
Examined NP sites			
6	Cinders Lane - Yapton NP	This is a former horticultural site in an area of significant demand with no development constraints identified for development in the Yapton NP for 30 dwellings in the period 2014-19	Yes
7	Main Road/Drove Lane- Yapton NP	This is an open field in an area of significant demand with no development constraints identified for development in the Yapton NP for 12 dwellings in the period 2014-19	Yes
8	Land north of Yapton CE Primary School - Yapton NP	This is an open field in an area of significant demand with no development constraints identified for development in the Yapton NP for 20 dwellings in the period 2014-19	Yes
9	Maypole Field- Yapton NP	This site is identified in Yapton NP. It comprises farmland and is estimated to provide capacity for 20 dwellings. The NP policy is that it should not come forward before 2019	Yes
10	Patterson Wilson Rd - NP site	The site is currently occupied by Sussex Police and the South East Coast Ambulance Service and is owned by West Sussex County Council. It is expected that the occupiers will have vacated the site by 2019 at the latest making it available for redevelopment. Littlehampton NP estimates its residential capacity as 15 dwellings	Yes
11	Fitzalan Rd/Church St - NP site	The future use of this site (former community hospital and Health Centre) depends on relocation of health services north of the town	Yes

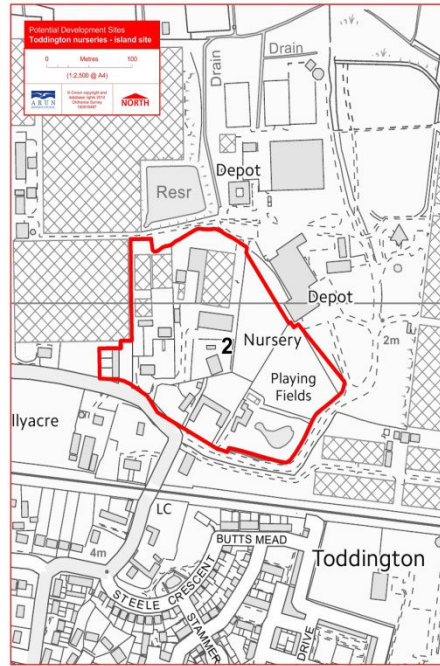
Site nos	Site Address	Comments	Included in Local Plan HLS?
		closer to the A259. The Littlehampton NP provides for 15 dwellings on this site, phased for delivery in post- 2019.	
12	Land Rear of Henty Arms, Ferring Lane - Ferring NP	This site is identified in the Ferring NP (passed examination on 12/8/14) for development in the period to 2019. It is being promoted by the PC through a community RTB order to fund community facilities in the village. This is an area of high demand, and there is no reason to suggest this will not come forward within the HLS period	Yes
13	Ferring Village Hall, Ferring Street- Ferring NP	This site of the Village Hall is identified in the Ferring NP to provide new housing to meet local demand and to realise full development value to re-invest in the provision of the replacement Ferring Community Centre. Its development is being actively promoted by the PC through a community RTB order.	Yes
14	Land at Ferringham Lane- Ferring NP	The land is currently occupied by a stone and builders merchant and a car repairs workshop, The Ferring NP provides for 25-30 dwellings in the latter half of the plan period.	Yes
15	The Rustington Convalescent Home (Carpenters), Sea Road - Rustington NP	This site is included in the Rustington NP, with support for residential development in principle. The site is within the curtilage of a Listed Building, and non-specific capacity is identified, however a capacity of 30 dwellings has previously been proposed. This is therefore included in the post 2019 plan period, to allow for the question of capacity to be resolved.	Yes

Site plans

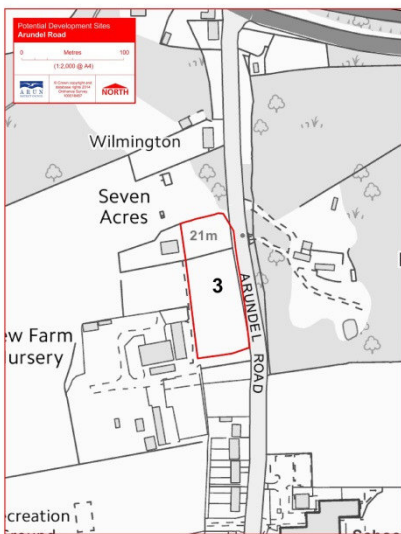
Site 1



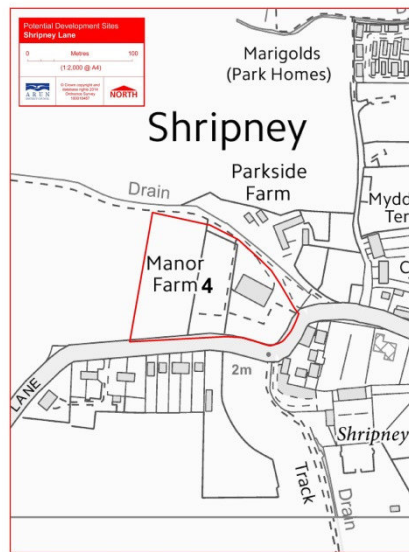
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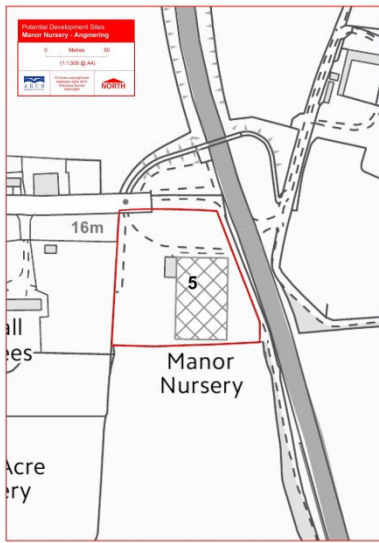
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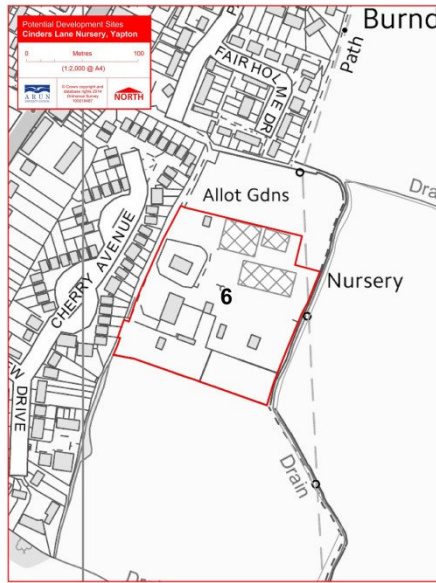
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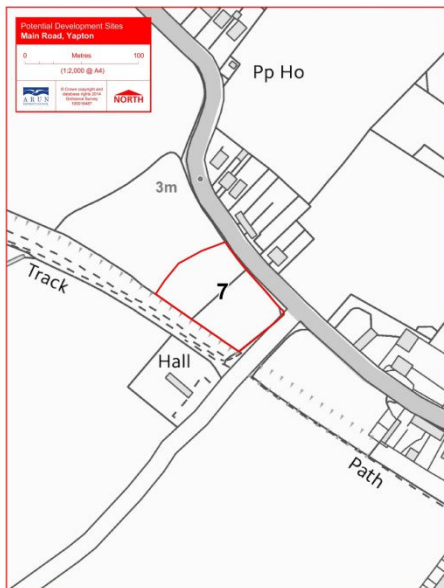
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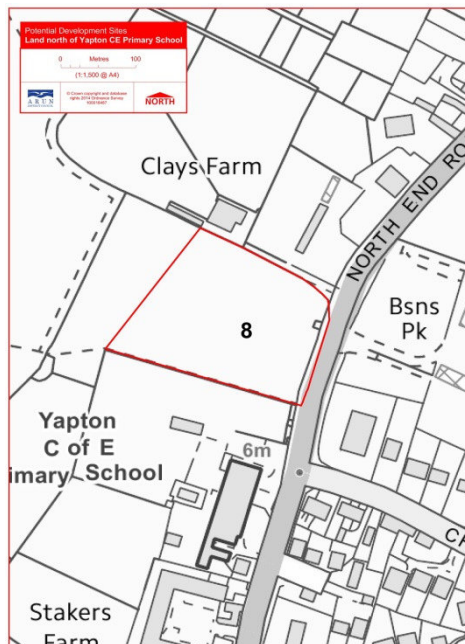
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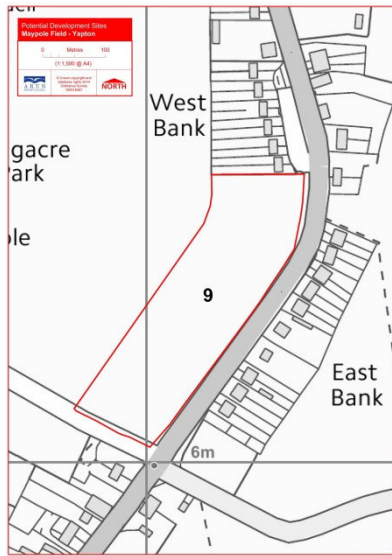
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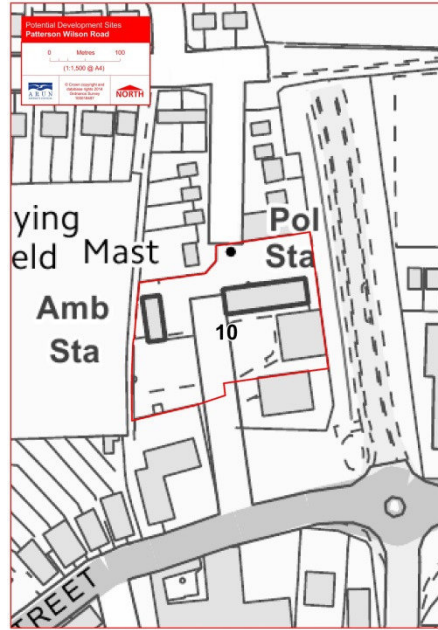
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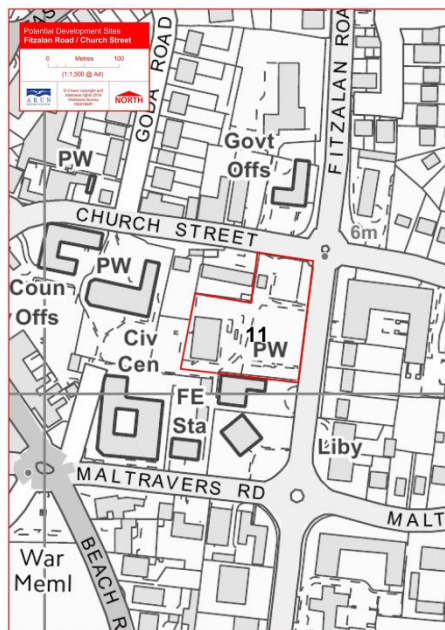
Site 9



Site 10



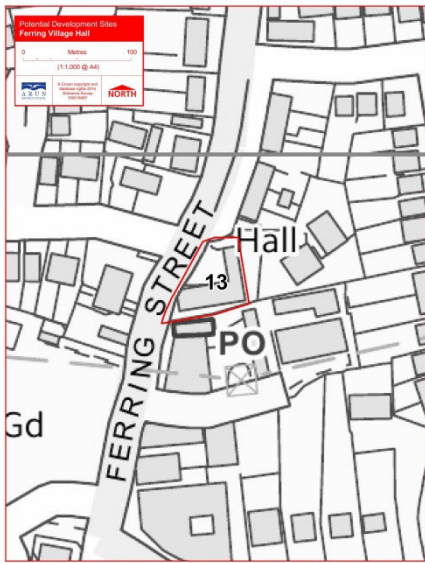
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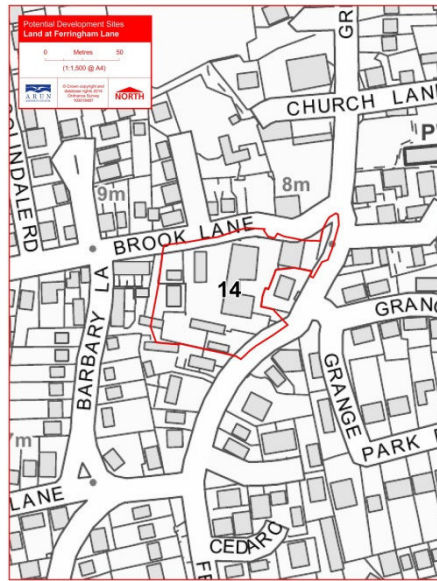
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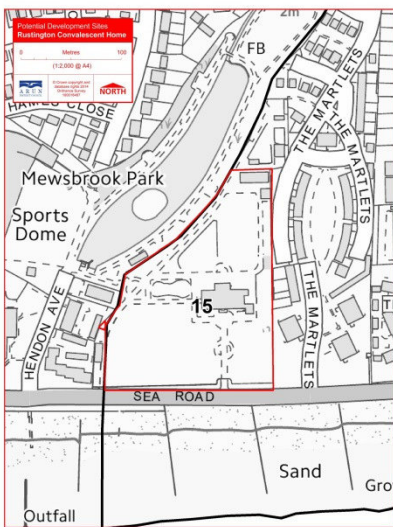
Site 13



Site 14



Site 15



Background Paper 3: Housing Land Supply Report

Appendix B - Arun District Council 5 year Housing Land Supply 2014-2019

1. This report sets out the Council's assessment of Housing Land Supply (HLS) for Arun District (excluding the South Downs National Park – SDNP) for the period 2014-2019, in accordance with the provisions of the National Planning Policy Framework (NPPF), also taking into account the guidance in the Planning Practice Guidance (PPG). Throughout this report 'Arun LPA area'/'the area' refers to Arun District excluding the SDNP.

National Planning Policy Framework

2. The NPPF was published by the government on 27 March 2012. One of its objectives is to 'boost significantly the supply of housing', and this includes a requirement that local planning authorities should identify and update annually a supply of specific deliverable sites to provide five years worth of housing against their housing requirements. An additional buffer of 5% (brought forward from later in the plan period) should be provided to ensure choice and competition in the market for land unless there has been a persistent under delivery of housing in which case the buffer should be increased to 20%.
3. The framework also states that LPAs may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. This should not include residential gardens.
4. The NPPF also contains guidance on deliverability and developability (footnotes to para 47).

Planning Practice Guidance

- 5 The government's streamlined planning guidance was launched on 6 March 2014. It includes guidance on issues such as the starting point for the HLS, deliverability, developability and dealing with past under- and over- supply.

Housing Requirement

- 6 The NPPF advises that housing requirements in local plans should meet the full objectively assessed needs for market and affordable housing in the housing market area, and that the housing land supply should provide 5 years worth of housing against these housing requirements. (para 47)
- 7 The PPG states that the starting point for estimating need is the DCLG household projections, and that these may need to be adjusted to reflect e.g. suppressed under-supply. It therefore advises that : 'The assessment will therefore need to reflect the consequences of past under delivery of housing' (PPG ref Paragraph: 015 Reference ID: 2a-015-20140306)

- 8 Arun DC has participated in a Strategic Housing Market Assessment (SHMA) with authorities in the Coastal West Sussex housing market area (Chichester to Lewes). A series of reports have been prepared, both at Coastal West Sussex level, and specifically for Arun District. The original assessment by GL Hearn, was updated in November 2012 and this was subject to further review, including a demographic update, a 'duty to cooperate' assessment and in Arun's case, a validation assessment by ORS Ltd, published in October 2013. A further update from GL Hearn was published in April 2014, specifically taking into account more up to date demographic information, and the requirements of the PPG.
- 9 The findings of these reports suggest a range of potential housing requirements for Arun LPA area, of between 550 and 650 dwellings per annum (dpa) for the period of the assessment (2011-2031). Taking into account objective factors, including historic delivery rates, and fully reflecting the advice of the housing market area 'duty to co-operate' report, the Council has decided that an appropriate requirement for the Arun LPA area for the period of the SHMA is an average of 580 dpa, providing a net increase of 11,600 dwellings in the area over this period. Note this is higher than the former South East Plan provisions for the period (2006-2026) which amounted to an average of 565 dpa (for Arun District).
- 10 This 5 year HLS assessment therefore provides for an annual requirement of 580 dpa for the period from 2011-2031 as fully meeting the objectively assessed needs of the Arun LPA area in the context of the Coastal West Sussex Housing Market area.
- 11 To calculate the requirement for the 5 year HLS period (2014-2019), completions for the period from commencement of the SHMA period (2011-2014) are netted off the requirement for this period, and the under-delivery for this period is added to the 5-year requirement. This ensures that the under-delivery is recovered during the 5 year period of this assessment, in accordance with the advice in the PPG (paras 036/7 Reference ID:3-036/7-20140306).

5% or 20% buffer

- 12 The NPPF requires HLS assessments to demonstrate that there is a supply of sites sufficient to provide 5 years worth of housing together with a 5% buffer moved forward from later in the plan period or, if there has been a record of persistent under-delivery of housing, the buffer should be increased to 20%.
- 13 Table B1 (Appendix B) provides annual data on housing completions for Arun District from 2006-2014, together with development plan requirements for each year. (Note that this is for the District including the SDNP as both the SE Plan and the SHMA are based on the District and do not exclude the National Park). During this period, while there have been years when the housing requirement was not met, there were other years when it was exceeded. The year 2011-2012 is particularly notable for delivering 722 dwellings net, 748 gross against requirements of 565 (SE Plan) or 580 (Coastal West Sussex

SHMA) respectively. A recent local appeal decision (Yapton Rd/Garden Cresc Barnham - APP/C3810/A/12/2180855 – 23/1/13) concluded that on this basis there was not a persistent under-delivery of housing in the District and this approach was endorsed in a more recent appeal decision (Woodgate Centre, Oak Tree Lane, Chichester - APP/C3810/A/13/2196029 - 30/10/13). Therefore in this assessment a buffer of 5% on top of the basic requirement of 580 dpa is adopted.

Housing Supply

14 The Housing Land Supply for 2014-2019 includes sites with planning permission and sites identified in the Councils Housing and Employment Land Availability Assessment (HELAA) (formerly SHLAA) and sites in Neighbourhood Plans (NPs) at an advanced stage, together with a windfall element, as follows:

Projected completions on large sites with planning permission

15 For the purposes of this study 'large' sites are taken to be sites of 10 dwellings or more. Note that prior to 2013, HLS assessments for the District took 6 dwellings as the large site threshold, and this is also the basis for the assessment by WSCC as published on their website. However, the source data for this assessment is taken from the WSCC Residential Land Availability (RLA) database, and is therefore consistent both with the published WSCC assessment and previous assessments for the District.

16 WSCC surveys all sites with planning permission of 6 dwellings or more in the District annually and provides a consistent assessment of the status of such sites, in terms of commencement, completion, and projected completions. This therefore provides a reliable basis for such sites being included in the HLS assessment, both in terms of the sites being deliverable and developable. The sites on which this assessment is based are listed in appendix A, which is divided into 3 areas for ease of reference, namely Littlehampton and the surrounding area, Bognor Regis and the surrounding area and Arundel and the villages.

17 The assessment includes all sites of 10 dwellings or more (gross) with planning permission as of 30/6/14 and projected completions on HELAA and Neighbourhood Plan (NP) sites.

18 Arun DC commissioned a comprehensive Strategic Housing Land Availability Assessment (SHAA) in 2009 and this was comprehensively updated in 2012. This assessment identified a range of sites across the District and assessed their general suitability and availability as potential housing sites. The study identified sites with planning permission, sites with development potential inside settlements, sites with development potential outside settlement and sites with no development potential. For the purpose of this HLS assessment, sites of 10 or more dwellings, as identified in the 2012 study were considered for inclusion. Some new SHLAA sites have also been considered, and

included if assessed to be developable and deliverable. Setting a site threshold of ten dwellings results in a relatively small number of potential SHLAA sites being considered. Sites have been included in the HLS assessment if, based on the assessment in 2012 or a current assessment, and the current and projected demand in the housing market, it is reasonable to expect them to come forward as projected. The SHLAA has now been incorporated into the HELAA.

- 19 Sites included in Neighbourhood Plans that have either been adopted, or passed examination are also included. All such sites have been assessed as to deliverability. Details of all such HELAA and NP sites and projected completion periods are set out in appendix A, which also includes a commentary on each site.

Projected completions on small sites.

- 20 The WSCC RLA database includes comprehensive information on all planning permissions for residential development of all site sizes and dwelling numbers. From this data it has therefore been possible to determine the number of dwellings permitted (net) on all 'small' sites, ie sites of 9 dwellings or less, as at 31st March 2014.

- 21 These sites are then categorised as either under construction ('In Course of Erection' – ICE), or not commenced. Sites under construction are assumed to be fully built out within the next 5 years, so these are included in the HLS in total. Sites that are not yet commenced are projected to be implemented over the 5 year period according to estimates for each of the 5 years based on historic analysis. These estimates include an allowance for non-implementation. All data and calculations relating to small site implementation are set out in appendix C

Projected completions on small windfall sites

- 22 The NPPF provides for LPAs to make an allowance for windfall sites in the 5 year supply if there is compelling evidence that such sites have consistently come available and will continue to provide a reliable source of supply.
- 23 Appendix C includes data from the WSCC RLA on dwelling completions on sites of 9 dwellings or less in the Arun LPA area from 2003 to 2014, specifically excluding development on residential gardens, in compliance with NPPF para 48. This demonstrates that completions on such sites were never lower than 61 dpa, and were as high as 123 dpa with an overall average of 90 dpa.
- 24 On this basis it is concluded that it is reasonable to provide a windfall allowance for sites of 9 dwellings or less at a rate of 90 dpa (the minimum average for the period 2003-2014) for the 5 year HLS period.

Small site implementation projections and windfall estimates

- 25 Appendix C includes a table setting out projected small site implementation rates and small site windfall allowance. For each year the windfall allowance is reduced by the projected implementation rate to give a composite assessment of small site implementation.

Housing Land Supply Assessment

- 26 The following tables build up the housing land supply assessment from the various data sources outlined above and set out in the appendices to this report:

Table 1: Housing requirement for the period 1/4/14 – 31/3/19

		Dwellings
A	Net dwellings required 2011-2014 (580x3)	1740
A1	Net completions 2011-2014	1557
A2	Under-supply 2011-2014 (A-A1)	183
B	Net dwellings required 2014-2019 (580x5)	2900
C	Balance to be provided 2014-2019 (B+A2)	3083
C1	Balance to be provided plus 5%	3237

Table 2: Deliverable Housing Land Supply 1/4/14 – 31/3/19

		Dwellings
A	Large (10+) sites with planning permission at 30/6/14, projected completions (gross) 2014-19 – appendix A	2496
B	Large (10+) sites with planning permission at 30/6/14, projected completions (losses) 2014-19 – appendix A	26
C	Large (10+) HELAA sites - projected completions (gross) 2014-19 – appendix A	356
D	Large (10+) HELAA sites – projected losses 2014-19 – appendix A	0

E	Small (9-) sites – total dwellings with pp at 31/3/14 – projected completions 2014-19 appendix C table C2	255
F	Small (9-) site windfall allowance – appendix C table C2	208
G	Total supply (A-B+C-D+E+F)	3289

Table 3: Five Year Housing Land Supply vs requirement 1/4/14 – 31/3/19

		Dwellings
A	Total deliverable Housing Supply (Table 2 row G)	3289
B	Five Year Housing Requirement (1 April 2014 to 31 March 2019) (table 1 row C)	3083
C	Annual requirement for HLS period (B/5)	616.6
D	No of years deliverable supply (A/C)	5.33
E	Five year housing requirement plus 5% (table 1 row C1)	3237

27 The above tables show that the available supply of housing is sufficient to provide for 5.33 years supply. It also demonstrates that the supply of housing exceeds the five year requirement plus 5%, so meeting the requirements of the NPPF.

Large site data (source WSCC RLA)

Littlehampton and area

Site Address	Years 1-5	Years 6-10	Years 10-15	Planning reference	Lapse Date
Sites with PP at 30/6/14					
Malvern & Kerria Station Road East Preston	12	0	0	EP013512	
Jenkins Yard Glenbarrie Way Ferring	39	0	0	FG002310	
Main A259 Road Ferring	40	0	0	FG010811	
Parklands Worthing Road Rustington	1	0	0	R005099	
Policy Site 7 Toddington (Windroos Nursery) Littlehampton	91	0	0	LU022910	28/09/2016
Toddington Nursery Littlehampton (Hollyacre Phase 2)	328	629	366	LU011613	
3 River Road Littlehampton	12	0	0	LU023408	
Littlehampton Covered Market Surrey Street Littlehampton	52	0	0	LU051704	
118 Wick Street Wick Littlehampton	13	0	0	ZJ005912	26/07/2015
Courtwick Lane Littlehampton	321	260	0	LU024813	
Totals	909	889	366		
Losses	12				
Net totals	897	889	366		
HELAA/NP sites					
Clock House & area Broadmark Lane/Vernon Close Rustington	0	10	0		
S/O Cornfield Close Littlehampton	30	88	0		
Land s/o Littlehampton Academy	68	0	0		
Land at Toddington Farm	12	0	0		
Patterson Wilson Rd - NP site	0	15	0		
Fizalan Rd/Church St - NP site	0	15	0		
Toddington 'island' site	0	0	200		
Land Rear of Henty Arms, Ferring Lane - Ferring NP	14	0	0		
Ferring Village Hall, Ferring Street- Ferring NP	10	0	0		
Land at Ferringham Lane- Ferring NP	0	25	0		
The Rustington Convalescent Home (Carpenters), Sea Road - Rustington NP	0	30	0		
Total (gross) HELAA/NP sites	134	183	200		

Losses	0	7	0
Net HELAA/NP sites	134	176	200

Bognor Regis and Area

Site Address	Years 1-5	Years 6-10	Years 11-15	Planning reference	Lapse Date
Sites with PP at 30/6/14					
Richmond Lodge Shripney Road Bognor Regis	10	0	0	BE008810	
Bersted Phase NWS Policy Site 6	229	93	0	Various	
The Family Tree 1 Laburnum Grove Bognor Regis	14	0	0	BR009612	
Site 6	326	26	0	FP025107	
Belmont Lodge Belmont Street Bognor Regis	13	0	0	BR016410	
Glenlogie and Wee Glenlogie Clarence Road Bognor Regis	2	0	0	BR014811	
21-23 Sturges Road Bognor Regis	12	0	0	BR031610	
St Michaels and All Angels Church Queens Field East West Mead Bognor Regis	10	0	0	AW029510	
Bognor Regis Community College Westloats Lane Bognor Regis	48	0	0	BR/014212	
55 & 57 Victoria Drive Bognor Regis	13	0	0	BR038907	
18 Durban Road Bognor Regis	14	0	0	BR019811	09/01/2015
Summerley Corner (south side) Limmer Lane Felpham	11	0	0	FP018909	
The Beach The Esplanade Bognor Regis	8	0	0	BR023911	03/06/2016
The Beach The Esplanade Bognor Regis	2	0	0	BR023911	03/06/2016
1st & 2nd floors, Queensway House Queensway Bognor Regis	16	0	0	BR014012	
Land R/O 27 North Bersted Street Bognor Regis	25	0	0	BE010513	
Totals	753	119	0		
Losses	6	0	0		
Net totals	747	119	0		
HELAA/NP sites					
Covers Richmond Road Bognor Regis	0	110	0		
Regis Centre site The Esplanade Bognor Regis	0	80	0		
Hothampton car park The Queensway Bognor Regis	0	100	0		
Bartons County Infant School, North Bersted - Bersted NP	20	0	0		
Total (gross) HELAA/NP sites	20	290	0		
Losses	0	0	0		
Net HELAA/NP sites	20	290	0		

Arundel and villages

SiteAddress	Years 1-5	Years 6-10	Years 11-15	Planning reference	Lapse Date
Sites with PP at 30/6/14					
Pollards Nursery Lake Lane Barnham	75	32	0	BR001612	17/10/2016
Land north of Yapton Road & east of Garden Crescent Barnham	44	0	0	BN000712	
Land east of Goodacres Barnham	75	0	0	BN001511	
Angels & Hyde Nurseries Yapton Road Barnham	86	0	0	BN002913	
Former Brooks Nursery Eastergate	40	0	0	EG002913	
Land to the rear of 43 45 & 47 Barnham Road Barnham	11	0	0	EG004412	
Land south of Fellows Gardens Yapton	34	0	0	Y003013	
Land to west of Kings Close Yapton	12	0	0	Y005911	
Land north of Burndell Road Yapton	173	0	0	Y008110	
The Lamb Inn Bilsham Road Yapton	14	0	0	Y4811	
Angmering pps May 2014	270	100	0		
Totals	834	132	0		
Losses	8	0			
Net totals	826	132	0		
HELAA/NP sites					
S/O Bramley Green/n/o Mayflower Way Angmering	35	65	0		
Sub station Ford Road Arundel	0	0	37		
Manor nursery, Angmering	32	0	0		
Eastergate NP site n/o Barnham, Rd	60	90	0		
Arundel NP site River Rd	13	0	0		
Arundel NP site - land at Fitzalan Rd	0	0	24		
Land north of Yapton CE Primary School - Yapton NP	20	0	0		
Cinders Lane - Yapton NP	30	0	0		
Main Road/Drove Lane- Yapton NP	12	0	0		
Maypole Field- Yapton NP	0	20	0		
Total (gross) HELAA/NP sites	202	175	61		
Losses		0	1		
Net HELAA/NP sites	202	175	60		

HELAA and NP site comments (sites with projected completion by 2019 only)

SiteAddress	Comments
Land s/o Littlehampton Academy	68 dwellings assumed by April 2019. Part of a surplus WSCC education site that is being promoted for development by WSCC, and is included as a housing site in the Littlehampton Neighbourhood Plan which has passed its examination prior to referendum. A planning application has now been submitted for 68 dwellings, so there are strong grounds for assuming this will proceed to be permitted, and that
S/O Cornfield Close, Littlehampton	30 dwellings of a total of 118 assumed by April 2019. This is part of a surplus WSCC education site that is being promoted for development by WSCC, and is included as a housing site in the Littlehampton Neighbourhood Plan. 30 of the dwellings in the East of the site are not infrastructure dependant, whereas the remaining 88 depend on the Fitzalan Link Rd, so are assumed for a later period.
S/O Bramley Green/n/o Mayflower Way Angmering	HELAA submission was for larger site of 100 dwellings. Recent discussions with owner of part of site suggest site likely to come forward for development – within built up area. Projected delivery, 35
Eastergate NP site n/o Barnam Rd, Eastergate	This site is included in Barnham and Eastergate Neighbourhood Plan and is being promoted by the parish Councils for implementation by 2019. The Neighbourhood Plan provides for 60 dwellings on the site, but pre-application discussions have suggested a capacity of 150 dwellings. The Neighbourhood Plan has passed its referendum and is awaiting adoption. There are no extraordinary infrastructure requirements for these proposals so it is reasonable to expect at least
Arundel NP site River Rd Arundel	This site is included in the Arundel Neighbourhood Plan that has been adopted following a referendum. The plan provides for the site to come forward by 2019. This is a small site in an area where sites are in demand, and there is little reason to suggest the site will not be
Land at Toddington Farm	This is within the Local Plan allocation for Toddington. A recent HELAA submission refers to a capacity of 12 dwellings and an intention to submit an application in the near future. This is a small site with no infrastructure constraints, and should pose no difficulties in being delivered by 2019.
Bartons County Infant school, North Bersted – NP site	This is a redundant WSCC school site within the built up area. The school has relocated, and the site has been identified in the Bersted Neighbourhood Plan (passed examination on 25/7/14) for 20 dwellings. WSCC have made pre-application enquiries about development of 25 dwellings. 20 dwellings are provided for by 2019
Land Rear of Henty Arms, Ferring Lane - Ferring NP	This site is identified in the Ferring NP (passed examination on 12/8/14) for development in the period to 2019. It is being promoted by the PC through a community RTB order to fund community facilities in the village. This is an area of high demand, and there is no reason to suggest this will not come forward within the HLS period
Ferring Village Hall, Ferring Street- Ferring NP	This site of the Village Hall is identified in the Ferring NP to provide new housing to meet local demand and to realise full development value to re-invest in the provision of the replacement Ferring

SiteAddress	Comments
	Community Centre. Its development is being actively promoted by the PC through a community RTB order .
Manor nursery, Toddington	This site is subject to a planning application for 32 dwellings, shortly to be considered by Planning Committee, and to be recommended for approval.
Land north of Yapton CE Primary School - Yapton NP	This is an open field in an area of significant demand with no development constraints identified for development in the Yapton NP (passed examination 14/8/14).
Cinders Lane - Yapton NP	This is a former horticultural site in an area of significant demand with no development constraints identified for development in the Yapton NP
Main Road/Drove Lane- Yapton NP	This is an open field in an area of significant demand with no development constraints identified for development in the Yapton NP (passed

Table A1 – Large site housing supply 2014-19 aggregate totals (as included in HLS tables 1-3)

	Large sites with PP			HELAA/NP sites		
	Gross	Losses	Net	Gross	Losses	Net
Littlehampton	909	12	897	134	0	134
Bognor Regis	753	6	747	20	0	20
Arundel Villages	834	8	826	202	0	202
Totals	2496	26	2470	356	0	356

Completions

Table B1 - Housing completions and requirements Arun District (including SDNP area) 2007-2014 (source WSCC RLA)

	Gross	Net	SE Plan requirement	SHMA requirement
2006-7	364	318	565	
-2008	637	591	565	
-2009	587	548	565	
-2010	448	416	565	
-2011	570	519	565	
-2012	748	722	565	580
-2013	499	483	565	580
-2014	397	367		580

Table B2 – Housing completions 2011-14 including/excluding SDNP

Completions		2011/12	2012/13	2013/14	2011/13
Including SDNP Sites	Total Gross	748	499	397	1644
	Total Net	722	483	367	1572
Excluding SDNP Sites	Total Gross	745	491	366	1602
	Total Net	723	475	359	1557

Small site data and calculations

Table C1– Small site windfall Arun LPA area 2003-2014 (source WSCC RLA)
Net completions from sites of 9 dwellings or less excluding SDNP

Excluding gardens	2003/4	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	Average
Small Sites Net	92	147	77	74	69	123	82	97	89	61	83	90

Table C2 – Small site commitments and windfall balance 2014-2019 (source WSCC RLA) (excluding SDNP and sites on garden land)

Site type	Units	Y1	Y2	Y3	Y4	Y5	Total Y1-Y5	Total (rounded)
ICE	146	73	43.8	29.2	0	0	146	146
Full	201	30.15	30.15	20.1	10.05	0	90.45	90
Outline	42	0	8.4	4.2	4.2	2.1	18.9	19
Total	389	103.15	82.35	53.5	14.25	2.1	255.35	255
Windfall balance*		0	7.65	36.5	75.75	87.9	207.8	208

Notes: 'ICE' = 'In Course of Erection'

'Full' = sites with full planning permission

'Outline' = sites with outline permission

'Total' = ICE + Full + Outline

'Windfall balance' = 90 - Total , unless total > 90

Background Paper 4: Housing Implementation Strategy

Arun Local Plan

Housing Implementation Strategy

1. Introduction

1.1 This Housing Implementation Strategy has been prepared to support the Arun Local Plan housing policies.

1.2 The requirement to provide a HIS is identified in the National Planning Policy Framework (NPPF) which states that local planning authorities should:

"for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target" (paragraph 47, 4th bullet point)

1.3 This Strategy sets out the Council's proposed approach to managing the delivery of housing over the Local Plan period to 2031, including market and affordable housing and housing for gypsies and travellers. Specifically it identifies:

- The sources of all forms of housing supply that will contribute to meeting the Plan's housing targets;
- The potential timescales for the phasing and delivery of development in different locations as set out in the Local Plan housing trajectory;
- The proposed mechanisms for delivering all forms of housing;
- The potential risks to housing delivery, both in terms of meeting the Objectively Assessed Need (OAN) as required by the NPPF, and affordable housing and gypsy and traveller needs;
- Potential contingencies for addressing these risks, where necessary;
- The Council's proposed approach to monitoring and managing housing delivery.

2. Background to housing implementation analysis

Completions

2.1 Over the period 2003-14, net completions in Arun District including the SDNP have averaged around 471 dwellings per year. (See table 1 below)

	2003/4	2004/5	2005/6	2006/7	2007/8	2008/9	209/10	2010/11	2011/12	2012/13	Average
Gross	552	386	304	364	637	587	448	570	748	499	510
Net	521	354	242	318	591	548	416	519	722	483	471

Table 1 – net and gross completions by year for Arun District including SDNP (source: WSCC)

Housing requirement and 5 year Housing Land Supply

2.2 The historic housing requirements for the District (including the SDNP) are as follows:

Period	Source	Annual housing requirement
2006-2011	SE Plan	565 dpa
2011-2031	Coastal Sussex SHMA	580 dpa

Table 2 – Arun DC Housing requirements 2003-2031

2.3 The District has an unchallenged 5 year HLS for the period 2013-18 for the area excluding the SDNP. The assessment for the period 2014-19 is attached at appendix A, and shows 5.33 years supply, meeting the NPPF requirements for 5 years supply plus 5%.

Affordable housing

2.4 The District has been successful in implementing an affordable housing strategy for the period 2010-15 as follows:

Housing strategy target 2010-2015 = 1,000

Completions at April 2014 = 812

Estimate completions 2010-15 = 1,042

Gypsies and Travellers

2.5 A Gypsy and Traveller needs assessment study dated April 2013 identified a need for 19 pitches for gypsies and travellers in the District in the period 2012-27, with a projected supply of 1 pitch due to the predicted movement of one household to bricks and mortar, resulting in a net need for 18 new pitches. Planning permission has been granted for 2 additional pitches since then (AL/25/13 approved 12/6/13 and P/70/12 and consequently granted on appeal APP/C3820/A/13/2201052). However, one Gypsy and Traveller pitch was lost when a Certificate of Lawfulness was granted for an existing use as a single dwelling house (AL/98/13/CLE).

2.6 With regard to travelling showpeople, the study identified a need for 5 plots to be provided in the period 2012-17, 1 plot to be provided in 2018-22 and 1 plot to be provided in 2023-27. Planning permission has been granted to provide 8 permanent plots since then (AL/10/14 approved 12/5/14; AL/50/13 approved 12/6/13 and AL/47/14/PL approved 02/09/14).

Local Plan Strategy

2.6 The Local plan provides for the balance of the housing requirement of 580 dpa for the period 2011-2013, based on the Coastal West Sussex SHMA (2012-14) (Local Plan paragraph 12.1.19) Table 3 provides a breakdown of this as at August 2014:

	Year from April...	Actual			Total
		2011	2012	2013	
A	Gross completions 2011-2014	745	491	382	1618
B	Losses 2011-2014	22	16	25	63
C	Net completions 2011-2014 (row A - row B)	723	475	357	1555
D	Requirement	580	580	580	1740
	Cumulative balance of requirement (Row C-row D) ('negative' = shortfall)	143	38	-185	-185

Table 3 – cumulative supply vs requirement – Arun DC excluding SDNP – source WSCC

This demonstrates a shortfall of 185 dwellings over the period 2011-14. This will be added to the requirement for the following 5 year period (2014-19), so the annual requirement for the period from 2014 to 2031 is as follows:

Period	2014-19	2019-31
Annual dwelling requirement	617	580

Table 4 – Annual dwelling requirements for 2014-31, Arun DC excluding SDNP

3. Housing supply

3.1 Housing supply for the plan period comprises the following:

- Sites with planning permission (at 30/6/14) – projected completions (source: WSCC RLA 2014)
- Deliverable sites without planning permission meeting the requirements of para 47 of the NPPF from a number of sources:
 - Sites identified from the Housing and Employment Land Availability Assessment (HELAA) database
 - Sites in Neighbourhood Plans (NPs) that have passed examination
 - Sites where planning applications are subject to a resolution to grant permission subject to a s106 agreement
 - Strategic development locations
- Town and Parish Council provision arising from Local Plan requirement (policy H SP1)
- Small sites windfall allowance

Projected completions on sites with planning permission

3.2 Data for completions from sites with planning permission distinguishes between ‘large’ sites of 10 dwellings or more and ‘small’ sites of 9 dwellings or less (gross). (NB WSCC RLA data applies a threshold of 6+/5- for large/small sites)

3.3 WSCC annually surveys all sites with planning permission of 6 dwellings or more in the District and provides a consistent assessment of the status of such sites, in terms of commencement, completion, and projected completions. This therefore provides a reliable basis for such sites being included in the supply, both in terms of the sites being deliverable and developable. The sites on which this assessment is based are listed in annex A of appendix A, which is divided into 3 areas for ease of reference, namely Littlehampton and the surrounding area, Bognor Regis and the surrounding area and Arundel and the villages.

Small site/windfall allowance

3.4 The WSCC assessment includes an assessment of small site completions, which, taken with a windfall allowance, provides for an estimate of delivery from sites of 9 dwellings or less.

3.5 For small site completions, sites are categorised as either under construction (‘In Course of Erection’ – ICE), or not commenced. Sites under construction are assumed to be fully built out within the next 5 years, so these are included in the supply in total. Sites that are not yet commenced are projected to be implemented over the 5 year period according to estimates for each of the 5 years based on historic analysis. These estimates include an allowance for non-implementation, as not all planning permissions are necessarily implemented. See table CA2 in annex C of appendix A for more details.

3.6 A conservative small site windfall allowance of 90 dpa is adopted for the first ten years of the local plan period. There were an average of 90 dpa completions from sites of 9 dwellings or less going back to 2003 (see table CA1 in annex C of appendix A). For the last 5 years of the Local Plan period a windfall allowance of 61 dpa is included. This is the lowest ever completions on sites of 9 dwellings or less since 2003. The 2 windfall assumptions are

therefore conservative. The windfall allowance for the 5 year period 2014-19 is netted off from the total projected small site completions to guard against double counting. See table CA2 in annex C of appendix A for more details.

Projected completions on HELAA sites

3.7 Arun DC maintains an active HELAA database, with an open 'call for sites' via the Council website. All submitted sites are considered for developability, and an assessment is then made as to whether or not to include them in the Housing Land Supply assessment. Table B2 of appendix B lists all sites from this source which have been included in the supply with an explanation for their inclusion.

Sites in Neighbourhood Plans

3.8 When Neighbourhood Plans pass examination, proposed housing sites are reviewed, and included as sites in the housing supply for the District. An assessment is made of the timescale for deliverability, and this will reflect any extraordinary development constraints that are likely to mitigate against early/immediate implementation. These sites are also listed in Appendix B.

Strategic development locations

3.9 Local plan policy H SP1 identifies the following strategic locations for housing development:

Barnham/Eastergate/Westergate – 2,000 dwellings
 Angmering – 600 dwellings
 Littlehampton Economic Growth Area – 1,000 dwellings
 Ford/Fontwell – no quantum

The Local Plan sets out in paras 12.1.34-12.1.57 and policy H SP1 the issues that need to be addressed in bringing forward these allocations. The following sections set out the measures being taken by ADC in partnership with others, to realise these allocations.

Barnham/Eastergate/Westergate

3.10 This strategic location is being progressed through a consortium of the two key landowners, Church Commissioners and Hanbury Properties Ltd, who have been working with the Council since 2012, and are poised to submit a planning application when the Local Plan has progressed sufficiently for their proposals not to be compromised. A full range of stakeholders is being involved in the project, including ATLAS, national agencies and local stakeholders.

3.11 The Local Plan identifies all the key infrastructure requirements that need to be in place to satisfactorily deliver the proposals. The Local Plan trajectory only envisages 200 of the 2,000 dwellings being completed during the first five year period of the local plan, and the PPG advises that full

justification for delivery is only necessary for development projected to be completed during the first five year period of a local plan. Nevertheless, the key infrastructure elements are as follows:

Transport measures

- A29 realignment to include a bridge over the railway and potential stopping up of Woodgate crossing;
- Improvements to Barnham Road;
- Internal access routes including east-west route linking Westergate with Barnham Station;
- Potential signalisation scheme at the Western Fontwell Roundabout to mitigate the impact of traffic upon the A27.

Drainage and utilities

- Comprehensive improvements to the drainage system
- Upgrade the Lidsey Waste Water Treatment Works (WWTW).
- Water mains.

Education

- Provision of one 2 Form Entry primary & integrated 60 place nursery.
- Expansion of existing secondary provision by approximately 360 pupils
- Expansion of existing 6th Form provision by approximately 140 pupils.

Healthcare

- Expansion to the existing GP surgery
- New dentist

Social infrastructure

- A new community centre

Open Space

- A green ring for recreation and village separation
- Country Park
- Natural and Semi-Natural Green Space
- Amenity Green Space
- Children's Space
- Young Person's Space
- Allotments

- Contributions to sport and leisure provision

3.12 These matters are all under active consideration. Funding from the LEP for the A29 has now been approved, and all the above measures are being factored into the consortium's viability appraisals for the area.

3.13 While there is still a degree of risk concerning delivery for this allocation because of the extent of pre-commencement requirements, there is very little risk of the initial 200 dwellings not being completed by April 2020, ie within the first five years of the local plan. Should there be any variation in the capacity resulting from the delivery project this can be factored into flexibility in the second and third five year periods.

Angmering

3.14 For the Angmering Strategic allocation, the following key infrastructure elements have been provided for in the s106 agreement for the permitted proposals:

Transport measures

- Improvements to the A259.
- Traffic calming schemes for Angmering village and Roundstone Lane and other local road improvements.
- Cycle parking capacity at Angmering Railway Station
- Improved of bus stop infrastructure,
- Road crossing facilities
- Footpath improvements

Education

- New 1 form entry primary school
- Contribution towards Secondary education
- Contribution towards Sixth Form education

Healthcare

- Contribution towards GP/staff provision at the Angmering Medical Centre.
- Investment in Angmering Medical Centre

Open Space

- A green lung through the site
- 2 x Neighbourhood Equipped Area of Play (Minimum area of 1000 square metres)

- LAPS/LEAPS
- Contributions to:
 - Outdoor fitness equipment/trail
 - Swimming pools
 - Sports halls/Community Buildings
 - Artificial turf pitches
 - Public art within the site
- Off-site provision for football pitches, and ancillary facilities

Public facilities:

- Contribution towards improvements to the existing library services
- Contribution towards the existing fire and rescue services

Utilities:

- Managed sustainable urban drainage system to accommodate surface water drainage within the site.

3.15 A section 106 agreement has already been concluded for the first phase of this development (370 dwellings), delivering sufficient funding to meet these infrastructure requirements, subject to final agreement on affordable housing provision . A further scheme of 32 dwellings has been approved subject to a s106 agreement being concluded to achieve the infrastructure requirements.

3.16 The remaining 198 dwellings for this allocation depend on Worthing Rugby Club relocating from their Angmering site to release the land for development. The club is in proactive discussions on a number of alternative options, some of which are within Arun District, and some of which are outside the District. The balance of 198 dwellings is included in the second 5 year period of the plan (2020-2025), to provide for the current degree of uncertainty over delivery. The position will be kept under review to ensure that, should alternative locations for the Rugby Club not be forthcoming, alternative options for identifying locations for delivery can be progressed.

Littlehampton Economic Growth Area,

3.17 There are 2 elements to the Littlehampton Economic Growth area, West Bank and Littlehampton east of the river Arun. Both will be progressed through an Area Action Plan DPD. Additional officer resources are being provided both for the Arun DC planning policy team and the Arun DC economic development team to make proactive progress on the DPD in the period 2014-15. This should provide for sufficiently long lead in times for the key infrastructure obstacles to be addressed in time to deliver at least 1,000 dwellings by the third LP period (2025-2030). This is based on the following assessment:

Littlehampton West Bank

3.18 This has long been a regeneration objective for Arun DC, and an in-principle acceptance that a key element of the regeneration programme is likely to include residential development to generate value for the significant scheme costs. Capacity of up to 1,000 dwellings has been discussed in this context. The key infrastructure obstacle to development here is the flood defences, given the flood risk zone designation for this area. The Environment Agency is actively engaged in, and supportive of the objective of regeneration subject to flood risk mitigation being acceptably addressed before any designation of new homes on the West Bank.

Littlehampton East of the River Arun

3.19 There is considerable potential for residential development on sites within Littlehampton east of the river Arun, including the potential relocation of the Police Station and the ambulance station. St Martin's car park may also have capacity for development. The main infrastructure issue in increasing capacity in this area is the final stage of linking the committed link from Toddington Nurseries and the Fitzalan Link to the A284 (Lymington bypass). This is expected to be funded through a mixture of contributions, including s106 obligations, Regional Growth fund/LEP funding and contributions from Network Rail. Other highways measures will be required, addressing site-specific access issues, but these are all considered to be achievable, and not strategic obstacles to delivery.

3.20 There is every expectation therefore, that the capacity of this area can be unlocked by the third 5 year period of the plan, and indeed, it may well be that the collective capacity of all the Littlehampton Economic Growth Area sites can achieve in excess of the 1,000 dwellings provided for in the housing trajectory. This is likely to provide choices to further ensure delivery, and possibly also to meet duty to cooperate considerations of adjoining LPAs.

Ford and Fontwell

3.21 Ford and Fontwell are both subject to private sector interest in promoting residential development, and in both cases Neighborhood Plans are in preparation. Specific proposals for up to 500 dwellings have been proposed by landowners at Fontwell. While no specific proposals are currently under consideration for Ford, the area in question is subject to a landowners consortium which has previously promoted significant and extensive proposals for up to 5,000 dwellings. In both cases the District Council wishes to work with the local communities, particularly via the Neighbourhood Plan process, so that support for any proposals is locally-based. In both cases, the local communities have with varying degrees of support, advocated development at some scale. If such support is forthcoming via the NP process the District Council will provide assistance in identifying infrastructure constraints and thresholds.

3.22 It is expected that NP progress will enable the potential of these areas to be reviewed within the first 5 year period of the local plan, providing sufficient lead in time for any infrastructure obstacles to be overcome to secure delivery by the third 5 year period, or beyond, into the following 5 year

period, outside the current Local Plan timescales. It is also possible that delivery of development from these sites might be progressed in shorter timescales, bringing them within the deliverable Housing Land Supply for the Local Plan, and additional deliverability flexibility.

3.23 The flexibility provided by these potential strategic allocations would enable supply to meet higher requirements in the latter period of the plan, should this be required, either for ‘Duty to Co-operate’ reasons, or because otherwise it is determined that the objectively assessed needs of the District requires it.

Town and Parish Council allocations

3.24 Policy H SP1 sets out housing allocations for some of the parishes and towns over the life of the plan. These are in addition to strategic allocations. As Neighbourhood Plans have progressed, they are being monitored, firstly to test the reliability of NPs as a source of housing delivery to implement these allocations, and secondly, to include sites in NPs at a sufficiently advanced stage (ie those that have passed examination), in the Housing Land Supply. Table 5 sets out the allocations provided for in policy H SP1, together with allocations in NPs that have passed examination. It also shows where planning permission has been granted for residential development in the NP area since 1/4/13, as this is the base date for the H SP1 allocations, and permissions granted since then can be netted off against the H SP1 allocations. This shows that, invariably, all Town and Parish areas with allocations have met, or exceeded the H SP1 allocations, thus demonstrating the reliability of this source of housing supply.

Parish	Policy H SP1 Allocation	Pps since 1/4/13 (excluding SA sites)	NP allocation	Net under/over provision	Comment
Arundel	50		74	24	
Barnham	100	107	0	7	Pollards nursery – allowed on appeal - included in HLS
Bersted	50	39	20	9	R/O 1-29 N Bersted St
Eastergate	100	40	60	0	
East Preston	30	0	30	0	
Ferring	50	0	54	3	
Littlehampton	200	0	200	0	
Rustington	30	0	30	0	
Yapton	100	34	82	16	Fellows Gardens approved post-1/4/13 included in HLS

Table 5 – NPs passed examination (at 1/10/14) – housing allocations

3.25 Sites in examined NPs have then been reviewed to consider their inclusion in the HLS. In many cases, the sites are small, and with little or no

constraints, and often the sites have been actively discussed with landowners and the community as part of the NP process. These sites are therefore considered to meet the requirements of the NPPF in being developable and deliverable within the first five year period of the Local Plan (unless the NP suggests later delivery, in which case the later delivery is assumed). In some cases, potential difficulties have constrained the expectation, so the sites have been included in later Local Plan periods. All examined NP sites have been included in the Local Plan housing land supply, with the most difficult, or least well progressed, included in the final five year period. The progression of these sites will be monitored so that alternative options can be considered for the supply if their delivery proves to be unlikely in due course. These sites are listed in table B2 in appendix B

3.26 Where NPs have yet to progress to examination, the policy allocation is moderated by netting off sites that have been proposed in the SHMAA/HELAA assessment as providing housing potential, as these sites may well be identified by the NPs, and this therefore avoids double counting. Such sites are identified in table B2 in appendix B. Table B2 then concludes with a net potential contribution for NPs, which is built into the Local Plan housing supply. This provision is not assumed to provide completions in the first five year local plan period, so it is spread out at a notional 35 dpa from the commencement of the second 5 year period.

4. **Affordable housing**

4.1 Arun DC has a comprehensive housing strategy entitled 'Raising the Roof', running for the period 2010-2015. This recognises the significant housing need in the District, and sets out a range of measures to address it. Germane to the discussion about housing delivery, the strategy has a target of delivering 1,000 affordable dwellings in this period, ie 200 dpa. It has been extremely successful in implementing this strategy, as indicated in the out-turn referred to in 2.4 above. It has yet to be decided if the strategy will be rolled forward in 2015, but meanwhile, proactive engagement with Registered Providers and site developers has resulted in a healthy programme of continued affordable housing provision, amounting to 779 affordable housing units projected to be provided in the period 2014 to 2022. This amounts to an average of 97 affordable housing units per annum across this 8 year period. See appendix C.

4.2 This projection of affordable housing delivery needs to be qualified in 2 related respects. Firstly, it is notable that delivery is significantly front-loaded, eg 188 and 187 dpa respectively are projected for 2013-15 and 2015/16, but in the later period this dips to 39 for 2020/21 and 2021/22. In practice, it may be that there is some slippage from the early years of the projection, but also, as yet unknown opportunities may well arise in the later period. For instance, the Council is committed to a modest programme (20dpa) of LA new build to rent, funded from the Housing Revenue Account and this programme has yet to find its way into the projections.

4.3 The second related factor is the inherent uncertainty in projecting affordable housing delivery over any length of time, due to its dependence on variable factors such as the availability of external finance, eg from the Homes and Communities Agency (HCA), and government policy. It could well be, for instance, that greater funding opportunities allow either greater affordable, housing delivery from sites in the programme, or that it enables affordable housing delivery from sites not currently in the programme. Of course, the reverse can also occur, although the projections referred to in 4.1 are based on agreed funding and so should be reliable.

4.4 The definition of affordable housing is notoriously variable. The Strategic Market Housing Assessment for the Coastal West Sussex housing market area suggests an annual affordable housing need of 578 dpa for Arun District the period 2011-16 (Coastal West Sussex SHMA update Arun District summary report GL Hearn November 2012). This is a comprehensive assessment based on household income, comprehensive aspiration for owner-occupation, and suppressed housing need where in some cases housing provision is satisfactory. Arun's housing market depends substantially on private rented accommodation which caters for a significant element of such affordable housing needs, and the SHMA accepts that this provides grounds for moderating the requirement.

4.5 Arun DC's housing strategy aims to provide for those in acute housing need, relying mainly on evidence from the housing register for the District, which has recently been revised to exclude those who are adequately housed (eg students living at home), but might wish to live separately. The SHMA makes the point that it is in any case unrealistic to plan to meet all of the aspirational affordable housing need, as to do so would require market housing delivery on scales never previously achieved in the District and for which there is therefore unlikely, to be a market. This contrasts with the needs addressed in the Housing Strategy which are urgent needs, reflecting entirely unsatisfactory housing conditions, which should be met.

4.6 In addition to the programme of affordable housing delivery referred to in 4.1, affordable housing requirements will also be made of all housing developments in accordance with Local Plan policy HSP2. Sources of such supply in addition to the committed programme will therefore arise from the strategic allocations, and from Neighbourhood Plan allocations, where such allocations exceed the 7/15 unit policy threshold. This is also built into the housing trajectory at appendix D, table D2. While, as referred to in 4.3 above, predicted affordable housing delivery is volatile due to its dependence on funding and government policy, for the purpose of the housing trajectory, policy compliance is assumed.

4.6 The affordable housing projections referred to in 4.1 and 4.6 are built into the local Plan housing trajectory (appendix D, table D2), and the sites are itemised in appendix C.

5. Trajectories

5.1 Appendix D contains a series of trajectories, meeting the requirements of the NPPF and illustrating the supply as referred to in sections 3 and 4 above. They are as follows:

5.2 Table D1 sets out the standard local plan trajectory, from the SHMA housing requirement base date of 2011, through the Local Plan period to 2031. This demonstrates that supply for the identified sources meets the requirement, with a net surplus of 16 dwellings over the plan period. It also shows the 'managed housing supply' which is the projected balance of net requirement for the local plan period at each year, divided by the remaining number of plan years. This data is shown graphically in chart D1. Chart D2 shows under/over provision annually against cumulative requirement. This demonstrates that the initial under-provision (projected to be -145 at the commencement of the plan period (2015)), is made good by 2017, and that from then onward supply is always shown to be in surplus against the requirement.

5.3 Table D2 provides a detailed breakdown of all the components of housing land supply, together with an analysis against the requirement. It therefore provides the basis on which table D1 and charts D1 and D2 are built. It also includes an affordable housing projection from all sources, as referred to in section 4 above, and sites in appendix C.

5.4 Table D3 provides a projection of the rolling 5-year housing supply, and shows that throughout the plan period, there is consistently projected to be a supply of housing that meets the 5-year supply provisions of the NPPF including a buffer of 5%.

5.5 Note that the trajectories do not include specific provision for the Ford/Fontwell Strategic allocations. This therefore provides a buffer against future requirements, arising either from 'Duty to Co-operate' requirements, or if it is otherwise determined that the objectively assessed needs of the District requires it.

6. Gypsies, Travellers and Travelling showpeople

6.1 The needs identified in paras 2.5 and 2.6 above fall into 2 categories, private need and public need. The Needs Assessment concluded that Arun's needs comprise a need for a site of 12 public pitches (10 for the period 2012-17, and 1 for each of the periods 2018-22 and 2023-27), and 6 private pitches (2 for each of the periods 2012-17, 2018-22 and 2023-27).

6.2 Paras 2.5 and 2.6 refer to approvals for a further 2 pitches for gypsy/traveller use a loss of one pitch through the granting of a certificate of lawfulness for an existing use for a single dwelling house, and approvals for a further 8 plots for travelling showpeople in the period April 2013-August 2014. This represents a significant contribution towards meeting the needs referred to in the Needs Assessment, (ie 2 private gypsy/traveller pitches and 1 travelling snowperson plot in the period 2012-17), and on this basis it seems likely that the needs for private pitch provision for Gypsy and Travellers and for Travelling Showpeople can be met through planning applications coming forward – effectively 'windfall' provision over the period of assessment, ie until 2016.

6.3 With regard to public provision, the Gypsy and Travellers site assessment (ORS April 2013) identified a number of options, of which only one (Nova Paddocks, Eastergate) is large enough for the required 12 pitch site. This site has not been considered by the Council, and it is suggested that alternatives need to be identified to enable choices to be made about the most appropriate sites for such use. The Local Plan includes an essentially enabling approach to provision for gypsies travellers and travelling showpeople, (HSP5), but it also includes the following clause:

'A site for at least 14 pitches for public Traveller provision will be identified and at least 10 public pitches will be allocated by 2017.'

6.4 The Local Development Scheme 2014 – 2017 states that the Gypsy and Traveller Sites DPD will identify a supply of specific deliverable sites sufficient to provide five years' worth of sites, to meet the locally set target which is underpinned by the Gypsy and Traveller Accommodation Assessment (GTAA). This will include provision for public and private sites. The DPD will also identify a supply of specific developable sites or broad locations for growth, for years six to ten and years eleven to fifteen of the plan period. The timetable within the scheme specifies that public consultation on the DPD is planned

for summer 2015. In preparation for this consultation stage, further technical work will be prepared to ensure that the evidence to support the DPD is as up to date as possible.

7. **Monitoring and managing housing delivery**

7.1 The Council maintains a comprehensive approach to monitoring housing delivery, based on West Sussex County Council's annual housing development monitoring survey. This is supplemented by additional information on potential site delivery and phasing gathered by the District Council. The annual monitoring survey provides comprehensive information on housing completions, housing commitments and other identified sites.

7.2 The Council's Authority Monitoring Report (AMR) and five-year housing land supply assessment will continue to be used to monitor performance in terms of annual and cumulative housing completions, projected future housing delivery and phasing of development set out in the housing trajectory. The AMR will also review actual housing delivery in comparison to the Local Plan five year housing land supply and overall housing requirements, and whether the delivery and projected future supply of housing falls within acceptable margins when compared to the Local Plan requirements.

7.3 If annual monitoring indicates that housing targets are not being met in terms of five year supply or potential delivery of sites in the longer term, the Council will, in the first instance, take actions to attempt to address the problem(s) within the existing Plan framework. Such actions may include: Working with landowners, developers and other relevant stakeholders to seek solutions to any identified obstacles to housing delivery; Adopting a flexible approach with respect to emerging plans and development proposals, where this would help to overcome identified obstacles to development; Considering options for involving the Homes and Communities Agency (HCA) or Registered Housing Providers (housing associations) in helping to bring forward sites where development has stalled.

However, in circumstances where the above actions prove insufficient to address the housing delivery problems, the Council may need to review the Local Plan. It is envisaged that this situation would arise in one of the following circumstances:

1. If new evidence indicates that there are insurmountable obstacles preventing development of one or more of the strategic locations identified in the Plan.
2. If new evidence leads to a significant reduction in the amount of housing deliverable at one or more of the strategic locations during the Plan period and there is no potential to make up the shortfall elsewhere within the Plan framework.
3. If new evidence indicates that one or more parishes are unable to provide suitable sites to meet the housing numbers required in Plan and there is no potential to make up the shortfall elsewhere within the Plan framework.

7.4 The Council's role and active engagement in the Coastal West Sussex Strategic Partnership will also provide review requirements in terms of the Duty to Co-operate, and the emerging requirements and provisions in Local Plans in partnership authority areas, as they progress through the plan preparation process.

Appendices:

Appendix A - Housing Land Supply assessment and data

Appendix B - HELAA and NP sites

Appendix C – Affordable housing delivery

Appendix D – Housing trajectories – tables and charts

Appendix A – Housing land supply assessment and data

5 year Housing Land Supply 2014-2019

1. This report sets out the Council's assessment of Housing Land Supply (HLS) for Arun District (excluding the South Downs National Park – SDNP) for the period 2014-2019, in accordance with the provisions of the National Planning Policy Framework (NPPF), also taking into account the guidance in the Planning Practice Guidance (PPG). Throughout this report 'Arun LPA area'/'the area' refers to Arun District excluding the SDNP.

National Planning Policy Framework

2. The NPPF was published by the government on 27th March 2012. One of its objectives is to 'boost significantly the supply of housing', and this includes a requirement that local planning authorities should identify and update annually a supply of specific deliverable sites to provide five years worth of housing against their housing requirements. An additional buffer of 5% (brought forward from later in the plan period) should be provided to ensure choice and competition in the market for land unless there has been a persistent under delivery of housing in which case the buffer should be increased to 20%.
3. The framework also states that LPAs may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. This should not include residential gardens.
4. The NPPF also contains guidance on deliverability and developability (footnotes to para 47).

Planning Practice Guidance

- 5 The government's streamlined planning guidance was launched on 6th March 2014. It includes guidance on issues such as the starting point for the HLS, deliverability, developability and dealing with past under- and over- supply.

Housing Requirement

- 6 The NPPF advises that housing requirements in local plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area, and that the housing land supply should provide 5 years worth of housing against these housing requirements. (para 47)
- 7 The PPG states that the starting point for estimating need is the DCLG household projections, and that these may need to be adjusted to reflect eg suppressed under-supply. It therefore advises that : 'The assessment will therefore need to reflect the consequences of past under delivery of housing' (PPG ref Paragraph: 015 Reference ID: 2a-015-20140306)

- 8 Arun DC has participated in a Strategic Housing Market Assessment (SHMA) with authorities in the Coastal West Sussex housing market area (Chichester to Lewes). A series of reports have been prepared, both at Coastal West Sussex level, and specifically for Arun District. The original assessment, by GL Hearn, was updated in November 2012 and this was subject to further review, including a demographic update, a 'duty to cooperate' assessment, and, in Arun's case, a validation assessment by ORS Ltd, published in October 2013. A further update has been published in April 2014, specifically taking into account more up to date demographic information, and the requirements of the PPG.
- 9 The findings of these reports suggest a range of potential housing requirements for Arun LPA area, of between 550 and 650 dpa for the period of the assessment (2011-2031). The SE Plan provisions for the SE Plan period (2006-2026) amounted to an average of 565 dpa (for Arun District). Taking into account objective factors, including historic delivery rates, and fully reflecting the advice of the housing market area 'duty to co-operate report, the Council has decided that an appropriate requirement for the Arun LPA area for the period of the SHMA is an average of 580 dpa, providing a net increase of 11,600 dwellings in the area over this period.
- 10 This 5 year HLS assessment therefore provides for an annual requirement of 580 dpa for the period from 2011-2031 as fully meeting the objectively assessed needs of the Arun LPA area in the context of the Coastal West Sussex Housing Market area.
- 11 To calculate the requirement for the 5 year HLS period (2014-2019), completions for the period from commencement of the SHMA period (2011-2014) are netted off the requirement for this period, and the under-delivery for this period is added to the 5-year requirement. This ensures that the under-delivery is recovered during the 5 year period of this assessment, in accordance with the advice in the PPG (paras 036/7 Reference ID:3-036/7-20140306).

5% or 20% buffer

- 12 The NPPF requires HLS assessments to demonstrate that there is a supply of sites sufficient to provide 5 years worth of housing together with a 5% buffer moved forward from later in the plan period or, if there has been a record of persistent under-delivery of housing, the buffer should be increased to 20%.
- 13 Table BA1 (Annex B) provides annual data on housing completions for Arun District from 2006-2014, together with development plan requirements for each year. (Note that this is for the District including the SDNP as both the SE Plan and the SHMA are based on the District and do not exclude the National Park). During this period, while there have been years when the housing requirement was not met, there were other years when it was exceeded. The year 2011-2012 is particularly notable for delivering 722 dwellings net, 748 gross against requirements of 565 (SE Plan) or 580 (Coastal West Sussex SHMA) respectively. A recent local appeal decision (Yapton Rd/Garden Cresc Barnham - APP/C3810/A/12/2180855 – 23/1/13) concluded that on this basis there was not a persistent under-delivery of housing in the District, and this approach was endorsed in a more recent appeal decision (Woodgate Centre, Oak Tree Lane, Chichester - APP/C3810/A/13/2196029 - 30/10/13). Therefore in this assessment a buffer of 5% on top of the basic requirement of 580 dpa is adopted.

Housing Supply

- 14 The Housing Land Supply for 2014-2019 includes sites with planning permission and sites identified in the Councils Housing and Employment Land Availability Assessment (HELAA) (formerly SHLAA) and sites in Neighbourhood Plans (NPs) at an advanced stage, together with a windfall element, as follows:

Projected completions on large sites with planning permission

- 15 For the purposes of this study 'large' sites are taken to be sites of 10 dwellings or more. Note that prior to 2013, HLS assessments for the District took 6 dwellings as the large site threshold, and this is also the basis for the assessment by WSCC as published on their website. However, the source data for this assessment is taken from the WSCC Residential Land Availability (RLA) database, and is therefore consistent both with the published WSCC assessment and previous assessments for the District.
- 16 WSCC surveys all sites with planning permission of 6 dwellings or more in the District annually and provides a consistent assessment of the status of such sites, in terms of commencement, completion, and projected completions. This therefore provides a reliable basis for such sites being included in the HLS assessment, both in terms of the sites being deliverable and developable. The sites on which this assessment is based are listed in annex A, which is divided into 3 areas for ease of reference, namely Littlehampton and the surrounding area, Bognor Regis and the surrounding area and Arundel and the villages.
- 17 The assessment includes all sites of 10 dwellings or more (gross) with planning permission as of 30/6/14.

Projected completions on HELAA and Neighbourhood Plan (NP) sites

- 18 Arun DC commissioned a comprehensive Strategic Housing Land Availability Assessment (SHAA) in 2009, and this was comprehensively updated in 2012. This assessment identified a range of sites across the District and assessed their general suitability and availability as potential housing sites. The study identified sites with planning permission, sites with development potential inside settlements, sites with development potential outside settlement and sites with no development potential. For the purpose of this HLS assessment, sites of 10 or more dwellings, as identified in the 2012 study were considered for inclusion. Some new SHLAA sites have also been considered, and included if assessed to be developable and deliverable. Setting a site threshold of ten dwellings results in a relatively small number of potential SHLAA sites being considered. Sites have been included in the HLS assessment if, based on the assessment in 2012 or a current assessment, and the current and projected demand in the housing market, it is reasonable to expect them to come forward as projected. The SHLAA has now been incorporated into the HELAA.

- 19 Sites included in Neighbourhood Plans that have either been adopted, or passed examination are also included. All such sites have been assessed as to deliverability. Details of all such HELAA and NP sites and projected completion periods are set out in table B2 (appendix B), which also includes a commentary on each site.

Projected completions on small sites.

20. The WSCC RLA database includes comprehensive information on all planning permissions for residential development of all site sizes and dwelling numbers. From this data it has therefore been possible to determine the number of dwellings permitted (net) on all 'small' sites, ie sites of 9 dwellings or less, as at 31st March 2014.

21. These sites are then categorised as either under construction ('In Course of Erection' – ICE), or not commenced. Sites under construction are assumed to be fully built out within the next 5 years, so these are included in the HLS in total. Sites that are not yet commenced are projected to be implemented over the 5 year period according to estimates for each of the 5 years based on historic analysis. These estimates include an allowance for non-implementation. All data and calculations relating to small site implementation are set out in annex C

Projected completions on small windfall sites

- 22 The NPPF provides for LPAs to make an allowance for windfall sites in the 5 year supply if there is compelling evidence that such sites have consistently come available and will continue to provide a reliable source of supply.

- 23 Annex C includes data from the WSCC RLA on dwelling completions on sites of 9 dwellings or less in the Arun LPA area from 2003 to 2014, specifically excluding development on residential gardens, in compliance with NPPF para 48. This demonstrates that completions on such sites were never lower than 61 dpa, and were as high as 123 dpa with an overall average of 90 dpa.

- 24 On this basis it is concluded that it is reasonable to provide a windfall allowance for sites of 9 dwellings or less at a rate of 90 dpa (the minimum average for the period 2003-2014) for the 5 year HLS period.

Small site implementation projections and windfall estimates

- 25 Annex C includes a table setting out projected small site implementation rates and small site windfall allowance. For each year the windfall allowance is reduced by the projected implementation rate to give a composite assessment of small site implementation.

Housing Land Supply Assessment

26 The following tables build up the housing land supply assessment from the various data sources outlined above and set out in the appendices to this report:

Table A1: Housing requirement for the period 1/4/14 – 31/3/19

		Dwellings
A	Net dwellings required 2011-2014 (580x3)	1740
A1	Net completions 2011-2014	1557
A2	Under-supply 2011-2014 (A-A1)	183
B	Net dwellings required 2014-2019 (580x5)	2900
C	Balance to be provided 2014-2019 (B+A2)	3083
C1	Balance to be provided plus 5%	3237

Table A2: Deliverable Housing Land Supply 1/4/14 – 31/3/19

		Dwellings
A	Large (10+) sites with planning permission at 30/6/14, projected completions (gross) 2014-19 – appendix A	2496
B	Large (10+) sites with planning permission at 30/6/14, projected completions (losses) 2014-19 – appendix A	26
C	Large (10+) HELAAA sites - projected completions (gross) 2014-19 – appendix A	356

D	Large (10+) HELAAA sites – projected losses 2014-19 – appendix A	0
E	Small (9-) sites – total dwellings with pp at 31/3/14 – projected completions 2014-19 appendix C table C2	255
F	Small (9-) site windfall allowance – appendix C table C2	208
G	Total supply (A-B+C-D+E+F)	3289

Table A3: Five Year Housing Land Supply vs requirement 1/4/14 – 31/3/19

		Dwellings
A	Total deliverable Housing Supply (Table 2 row G)	3289
B	Five Year Housing Requirement (1 April 2014 to 31 March 2019) (table 1 row C)	3083
C	Annual requirement for HLS period (B/5)	616.6
D	No of years deliverable supply (A/C)	5.33
E	Five year housing requirement plus 5% (table 1 row C1)	3237

27. The above tables show that the available supply of housing is sufficient to provide for 5.33 years supply. It also demonstrates that the supply of housing exceeds the five year requirement plus 5%, so meeting the requirements of the NPPF.

Annex A – large site data (source WSCC RLA, plus HELAA/NP sites as in table B2)

Littlehampton and area					
Site Address	Years 1-5	Years 6-10	Years 10-15	Planning reference	Lapse Date
Sites with PP at 30/6/14					
Malvern & Kerria Station Road East Preston	12	0	0	EP013512	
Jenkins Yard Glenbarrie Way Ferring	39	0	0	FG002310	
Main A259 Road Ferring	40	0	0	FG010811	
Parklands Worthing Road Rustington	1	0	0	R005099	
Policy Site 7 Toddington (Windroos Nursery) Littlehampton	91	0	0	LU022910	28/09/2016
Toddington Nursery Littlehampton (Hollyacre Phase 2)	328	629	366	LU011613	
3 River Road Littlehampton	12	0	0	LU023408	
Littlehampton Covered Market Surrey Street Littlehampton	52	0	0	LU051704	
118 Wick Street Wick Littlehampton	13	0	0	ZJ005912	26/07/2015
Courtwick Lane Littlehampton	321	260	0	LU024813	
Totals	909	889	366		
Losses	12				
Net totals	897	889	366		
HELAA/NP sites					
Clock House & area Broadmark Lane/Vernon Close Rustington	0	10	0		
S/O Cornfield Close Littlehampton	30	88	0		
Land s/o Littlehampton Academy	68	0	0		
Land at Toddington Farm	12	0	0		

Patterson Wilson Rd - NP site	0	15	0
Fizalan Rd/Church St - NP site	0	15	0
Toddington 'island' site	0	0	200
Land Rear of Henty Arms, Ferring Lane - Ferring NP	14	0	0
Ferring Village Hall, Ferring Street-Ferring NP	10	0	0
Land at Ferringham Lane- Ferring NP	0	25	0
The Rustington Convalescent Home (Carpenters), Sea Road - Rustington NP	0	30	0
Total (gross) HELAA/NP sites	134	183	200
Losses	0	7	0
Net HELAA/NP sites	134	176	200

Bognor Regis and Area

Site Address	Years 1-5	Years 6-10	Years 11-15	Planning reference	Lapse Date
Sites with PP at 30/6/14					
Richmond Lodge Shripney Road Bognor Regis	10	0	0	BE008810	
Bersted Phase NWS Policy Site 6	229	93	0	Various	
The Family Tree 1 Laburnum Grove Bognor Regis	14	0	0	BR009612	
Site 6	326	26	0	FP025107	
Belmont Lodge Belmont Street Bognor Regis	13	0	0	BR016410	
Glenlogie and Wee Glenlogie Clarence Road Bognor Regis	2	0	0	BR014811	
21-23 Sturges Road Bognor Regis	12	0	0	BR031610	
St Michaels and All Angels Church Queens Field East West Mead Bognor Regis	10	0	0	AW029510	

Bognor Regis Community College Westloats Lane Bognor Regis	48	0	0	BR/014212	
55 & 57 Victoria Drive Bognor Regis	13	0	0	BR038907	
18 Durban Road Bognor Regis	14	0	0	BR019811	09/01/2015
Summerley Corner (south side) Limmer Lane Felpham	11	0	0	FP018909	
The Beach The Esplanade Bognor Regis	8	0	0	BR023911	03/06/2016
The Beach The Esplanade Bognor Regis	2	0	0	BR023911	03/06/2016
1st & 2nd floors, Queensway House Queensway Bognor Regis	16	0	0	BR014012	
Land R/O 27 North Bersted Street Bognor Regis	25	0	0	BE010513	
Totals	753	119	0		
Losses	6	0	0		
Net totals	747	119	0		
HELAA/NP sites					
Covers Richmond Road Bognor Regis	0	110	0		
Regis Centre site The Esplanade Bognor Regis	0	80	0		
Hothampton car park The Queensway Bognor Regis	0	100	0		
Bartons County Infant School, North Bersted - Bersted NP	20	0	0		
Total (gross) HELAA/NP sites	20	290	0		
Losses	0	0	0		
Net HELAA/NP sites	20	290	0		

Arundel and villages

SiteAddress	Years 1-5	Years 6-10	Years 11-15	Planning reference	Lapse Date
Sites with PP at 30/6/14					
Pollards Nursery Lake Lane Barnham	75	32	0	BR001612	17/10/2016
Land north of Yapton Road & east of Garden Crescent Barnham	44	0	0	BN000712	
Land east of Goodacres Barnham	75	0	0	BN001511	
Angels & Hyde Nurseries Yapton Road Barnham	86	0	0	BN002913	
Former Brooks Nursery Eastergate	40	0	0	EG002913	
Land to the rear of 43 45 & 47 Barnham Road Barnham	11	0	0	EG004412	
Land south of Fellows Gardens Yapton	34	0	0	Y003013	
Land to west of Kings Close Yapton	12	0	0	Y005911	
Land north of Burndell Road Yapton	173	0	0	Y008110	
The Lamb Inn Bilsham Road Yapton	14	0	0	Y4811	
Angmering pps May 2014	270	100	0		
Totals	834	132	0		
Losses	8	0			
Net totals	826	132	0		
HELAA/NP sites					
S/O Bramley Green/n/o Mayflower Way Angmering	35	65	0		
Sub station Ford Road Arundel	0	0	37		
Manor nursery, Toddington	32	0	0		
Eastergate NP site n/o Barnham, Rd	60	90	0		
Arundel NP site River Rd	13	0	0		
Arundel NP site - land at Fitzalan Rd	0	0	24		
Land north of Yapton CE Primary School - Yapton NP	20	0	0		
Cinders Lane - Yapton NP	30	0	0		
Main Road/Drove Lane- Yapton NP	12	0	0		

Maypole Field- Yapton NP	0	20	0
Total (gross) HELAA/NP sites	202	175	61
Losses		0	1
Net HELAA/NP sites	202	175	60

Table AA1 – Large site housing supply 2014-19 aggregate totals (as included in HLS tables A1-A3)

	Large sites with PP			HELAA/NP sites		
	Gross	Losses	Net	Gross	Losses	Net
Littlehampton	909	12	897	134	0	134
Bognor Regis	753	6	747	20	0	20
Arundel Villages	834	8	826	202	0	202
Totals	2496	26	2470	356	0	356

Annex B – Completions

Table BA1 - Housing completions and requirements Arun District (including SDNP area) 2007-2014 (source WSCC RLA)

	Gross	Net	SE Plan requirement	SHMA requirement
2006-7	364	318	565	
-2008	637	591	565	
-2009	587	548	565	
-2010	448	416	565	
-2011	570	519	565	
-2012	748	722	565	580
-2013	499	483	565	580
-2014	397	367		580

Table BA2 – Housing completions 2011-14 including/excluding SDNP

Completions		2011/12	2012/13	2013/14	2011/13
Including SDNP Sites	Total Gross	748	499	397	1644
	Total Net	722	483	367	1572
Excluding SDNP Sites	Total Gross	745	491	366	1602
	Total Net	723	475	359	1557

Annex C – Small site data and calculations

Table CA1– Small site windfall Arun LPA area 2003-2014 (source WSCC RLA)
Net completions from sites of 9 dwellings or less excluding SDNP

Excluding gardens	2003/4	2004/5	2005/6	2006/7	2007/8	2008/9	2009 /10	2010 /11	2011 /12	2012 /13	2013 /14	Average
Small Sites Net	92	147	77	74	69	123	82	97	89	61	83	90

Table CA2 – Small site commitments and windfall balance 2014-2019 (source WSCC RLA) (excluding SDNP and sites on garden land)

Notes: 'ICE' = Erection' 'Full' = planning	Site type	Units	Y1	Y2	Y3	Y4	Y5	Total Y1-Y5	Total (rounded)	'In Course of sites with full permission
	ICE	146	73	43.8	29.2	0	0	146	146	
	Full	201	30.15	30.15	20.1	10.05	0	90.45	90	
	Outline	42	0	8.4	4.2	4.2	2.1	18.9	19	
	Total	389	103.15	82.35	53.5	14.25	2.1	255.35	255	
	Windfall balance*		0	7.65	36.5	75.75	87.9	207.8	208	

'Outline'=sites with outline permission

'Total'= ICE + Full + Outline

'Windfall balance' = 90 - Total , unless total>90

Appendix B - HELAA and NP sites included in HLS

Table B1 – Town/Parish allocations and NP provision

Parish	Allocation	HELAA site totals included in HLS	Deduction from T&P contribution to Local Plan requirement	NP allocations	Allocation balance	Comments
Aldingbourne(/ Westergate)	30	0	0	0	30	
Aldwick	30	0	0	0	30	
Angmering	100	100	100	0	0	S/O Bramley Green
Arundel	50	15	25	74	0	Sub station site+10 in SDNP
Barnham	100	107	100	0	0	Pollards nursery – allowed on appeal - included in HLS
Bersted	50	39	39	20	0	R/O 1-29 N Bersted St
Bognor Regis	300	320	300	0	0	Covers Richmond Road ,Regis Centre site The Esplanade, Hothampton car park The Queensway
Eastergate	100	40	60	60	0	Brooks nursery approved 26/9/13 included in HLS
East Preston	30	0	0	0	30	
Ferring	50	0	0	49	0	
Littlehampton	200	250	200	186	0	S/O Cornfield Close, Land s/o Littlehampton academy, Hollyacre
Middleton-on-Sea	30	0	0	0	30	
Pagham	100	0	0	0	100	
Rustington	30	3	3	30	0	Clock House and surrounding area
Walberton	50	0	0	0	50	
Yapton	100	34	34	82	0	Fellows Gardens approved post-1/4/13 included in HLS
Totals	1350		861		270	

Table B2 – HELAA and NP sites included in HLS	
SiteAddress	Comments
Clock House & area Broadmark Lane/Vernon Close Rustington	This site was identified in the original 2009 SHLAA with a suggested capacity of 15 dwellings. It is a large house converted to flats, with four bundalows also included in the site. Intensive development has been opposed by the PC, and the site is not identified in the NP. It is therefore included in the HLS as a site for 10 dwellings, with a loss of 7 dwellings, so a net gain of 3, not expected to be developed until 2019-2023.
S/O Cornfield Close, Littlehampton	30 dwellings of a total of 118 assumed by April 2019. This is part of a surplus WSCC education site that is being promoted for development by WSCC, and is included as a housing site in the Littlehampton Neighbourhood Plan. 30 of the dwellings in the East of the site are not infrastructure dependant, whereas the remaining 88 depend on the Fitzalan Link Rd, so are assumed for a later period.
Land s/o Littlehampton Academy	68 dwellings assumed by April 2019. Part of a surplus WSCC education site that is being promoted for development by WSCC, and is included as a housing site in the Littlehampton Neighbourhood Plan which has passed its examination prior to referendum. A planning application has now been submitted for 68 dwellings, so there are strong grounds for assuming this will proceed to be permitted, and that it will be completed by April 2019.
Land at Toddington Farm	This is within the Local Plan allocation for Toddington. A recent HELAAA submission refers to a capacity of 12 dwellings and an intention to submit an application in the near future. This is a small site with no infrastructure constraints, and should pose no difficulties in being delivered by 2019.

Patterson Wilson Rd - NP site	The site is currently occupied by Sussex Police and the South East Coast Ambulance Service and is owned by West Sussex County Council. It is expected that the occupiers will have vacated the site by 2019 at the latest making it available for redevelopment. Littlehampton NP estimates its residential capacity as 15 dwellings
Fizalan Rd/Church St - NP site	The future use of this site (former community hospital and Health Centre) depends on relocation of health services north of the town closer to the A259. The Littlehampton NP provides for 15 dwellings on this site, phased for delivery in post- 2019.
Toddington nurseries - island site	This is within the local plan allocation for Toddington, but is not included in the area for which planning permission has been granted. It is in multiple ownerships, and there are no active proposals to bring the site forward. However, it is a site with potential within the built up area, so can reasonably be included in the Housing Land Supply for the District in the later plan period. The site is considered to provide a capacity c200 dwellings.
Land Rear of Henty Arms, Ferring Lane - Ferring NP	This site is identified in the Ferring NP (passed examination on 12/8/14) for development in the period to 2019. It is being promoted by the PC through a community RTB order to fund community facilities in the village. This is an area of high demand, and there is no reason to suggest this will not come forward within the HLS period
Ferring Village Hall, Ferring Street- Ferring NP	This site of the Village Hall is identified in the Ferring NP to provide new housing to meet local demand and to realise full development value to re-invest in the provision of the replacement Ferring Community Centre. Its development is being actively promoted by the PC through a community RTB order .
Land at Ferringham Lane- Ferring NP	The land is currently occupied by a stone and builders merchant and a car repairs workshop, The Ferring NP provides for 25-30 dwellings in the latter half of the plan period.

The Rustington Convalescent Home (Carpenters), Sea Road - Rustington NP	This site is included in the Rustington NP, with support for residential development in principle. The site is within the curtilage of a Listed Building, and non-specific capacity is identified, however a capacity of 30 dwellings has previously been proposed. This is therefore included in the post 2019 plan period, to allow for the question of capacity to be resolved.
Covers Richmond Road Bognor Regis	This is a builders merchant warehouse, identified in the original 2009 SHLAA as a site for 110 dwellings. IT has so far failed to come forward, so is now included in the HLS for the period 2019-23
Regis Centre site The Esplanade Bognor Regis	This site comprises the Regis Centre, market area and Council offices, identified in the original 2009 SHLAA. It is part of the Bognor Regis regeneration scheme, which is currently being re-negotiated. It is therefore now included in the HLS for 80 dwellings in the period 2019-23
Hothampton car park The Queensway Bognor Regis	This site comprises a health centre, car park and park/play area, identified in the original SHLAA. It is part of the Bognor Regis regeneration scheme, which is currently being re-negotiated. It is therefore now included in the HLS for 100 dwellings in the period 2019-23
Bartons County Infant school, North Bersted – NP site	This is a redundant WSCC school site within the built up area. The school has relocated, and the site has been identified in the Bersted Neighbourhood Plan (passed examination on 25/7/14) for 20 dwellings. WSCC have made pre-application enquiries about development of 25 dwellings. 20 dwellings are
S/O Bramley Green/n/o Mayflower Way Angmering	HELAA submission was for a site of 100 dwellings. Recent discussions with owner of part of site suggest part of the site likely to come forward for development – within built up area. Projected delivery, 35 by 2019, 65 in the period 2019-23.
Sub station Ford Road Arundel – NP site	This site comprises the former Arundel gas works. There are ownership and ground condition problems. It is identified in the NP for 37 dwellings in the period 2020-29.
Manor nursery, Toddington	This site is subject to a planning application for 32 dwellings, shortly to be considered by Planning Committee, and to be recommended for approval.

Eastergate NP site n/o Barnam Rd, Eastergate	This site is included in Barnham and Eastergate Neighbourhood Plan and is being promoted by the parish Councils for implementation by 2019. The Neighbourhood Plan provides for 60 dwellings on the site, but pre-application discussions have suggested a capacity of 150 dwellings. The Neighbourhood Plan has passed its referendum and is awaiting adoption. There are no extraordinary infrastructure requirements for these proposals so it is reasonable to expect at least 60 units to be completed by 2019.
Arundel NP site River Rd Arundel	This site is included in the Arundel Neighbourhood Plan that has been adopted following a referendum. The plan provides for the site to come forward by 2019. This is a small site for 13 dwellings in an area where sites are in demand, and there is little reason to suggest the site will not be completed by 2019.
Arundel NP site - land at Fitzalan Rd	The Arundel NP identified this site, comprising industrial premises and a large residential plot, for 24 dwellings in the later part of the plan period.
Land north of Yapton CE Primary School - Yapton NP	This is an open field in an area of significant demand with no development constraints identified for development in the Yapton NP (passed examination 14/8/14).
Cinders Lane - Yapton NP	This is a former horticultural site in an area of significant demand with no development constraints identified for development in the Yapton NP
Main Road/Drove Lane- Yapton NP	This is an open field in an area of significant demand with no development constraints identified for development in the Yapton NP (passed
Maypole Field- Yapton NP	This site is identified in Yapton NP. It comprises farmland and is estimated to provide capacity for 20 dwellings. The NP policy is that it should not come forward before 2019

Appendix C – affordable housing programme delivery 2014-2022

SiteAddress	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	Average	
Jenkins Yard Glenbarrie Way Ferring	12	0	0	0	0	0	0	0	12	
Main A259 Road Ferring	0	8	0	0	0	0	0	0	8	
Toddington Nursery		35	35	35	35	35	35	30	240	
Bersted Phase 2 Policy Site 6	10	5	0	0	0	0	0	0	15	
Bersted Phase 2 Policy Site 6	8	0	0	0	0	0	0	0	8	
The Family Tree 1 Laburnum Grove Bognor Regis	8	0	0	0	0	0	0	0	8	
The Family Tree 1 Laburnum Grove Bognor Regis	6	0	0	0	0	0	0	0	6	
Bognor Regis Community College Westloats Lane Bognor Regis	14								14	
'Land east of Goodacres Barnham									0	
White Croft & Blue Haze Shripney Road Bersted	0	0	0	0	0	0	0	0	0	
Land north of Yapton Road & east of Garden Crescent Barnham	0	14	0	0	0	0	0	0	14	
'Land north of Burndell Road Yapton	35	34							69	
The Lamb Inn Bilsham Road Yapton	2	0	0	0	0	0	0	0	2	
Littlehampton Covered Market Surrey Street Littlehampton	52	0							52	
Hollyacre Toddington Lane Littlehampton		34	0	0					34	
Former Brooks Nursery Eastergate	12								12	
Pollards Nursery Lake Lane Barnham			10	10	8				28	
Land s/o Fellows Gardens, Yapton		10		0	0				10	
Angmering pps		14	0	24	0				38	
Courtwick	29	20	0	31	31	31	4	0	146	
Angels nursery				26					26	
North Bersted St Bognor Regis		13	12						25	
Windroos				12					12	
Totals	188	187	57	138	74	66	39	30	779	97

Appendix D – Housing Trajectories – tables and charts

Arun District: Local Plan Housing trajectory 2011-2031

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
Existing commitments & allocations																				
PPs and Completions	723	475	359	618	406	668	529	503	453	272	165	130	120	120	120	120	6	0	0	0
Small site windfall				0	8	37	76	88	90	90	90	90	90	90	61	61	61	61	61	61
Future housing assumptions																				
HELAA sites				0	16	16	12	35	143	135	55	25	0	40	50	50	50	0	0	0
NP sites (net)				0	23	35	115	104	95	115	73	60	50	125	35	35	25	0	0	0
SAs - Angmering	0	0	0		0	0	0	0	0	15	50	50	50	33						0
SAs - B/E/W									200	200	200	200	200	200	200	200	200	200		0
SAs - Littlehampton/Ford/Fontwell															200	200	200	200	200	0
Total Projected Completions (net)	723	475	359	618	453	755	732	730	981	827	633	555	510	608	666	666	542	461	261	61
Cumulative net completions	723	1198	1557	2175	2628	3383	4115	4845	5826	6653	7286	7841	8351	8959	9625	10291	10833	11294	11555	11616
SHMA base annual housing requirement	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580
Cumulative strategic requirement	580	1160	1740	2320	2900	3480	4060	4640	5220	5800	6380	6960	7540	8120	8700	9280	9860	10440	11020	11600
Monitor. Position above/below annualised strategic requirement	143	38	-183	-145	-272	-97	55	205	606	853	906	881	811	839	925	1011	973	854	535	16
Manage. Annual requirement taking into account past/projected completions	300	572	578	591	589	598	587	576	563	525	495	479	470	464	440	395	327	256	153	45

2011-15	2015-20	2020-25	2025-31	2011-31
2175	2559	807	246	5787
0	298	450	366	1114
0	0	0	0	0
0	222	255	150	627
0	372	423	95	890
0	0	198	0	198
0	200	1000	800	2000
0	0	0	1000	1000
2175	3651	3133	2657	11616
2320	2900	2900	3480	11600
-145	751	606	-823	16

Table D1 – summary trajectory. For underlying data see table D2

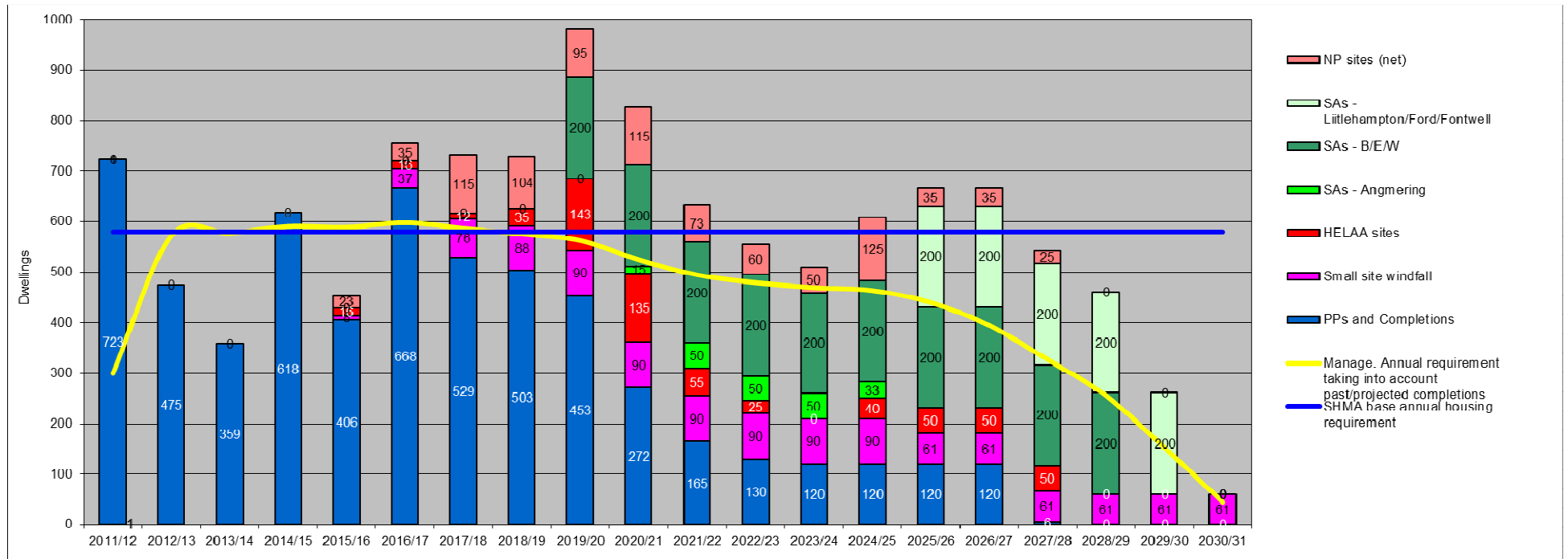
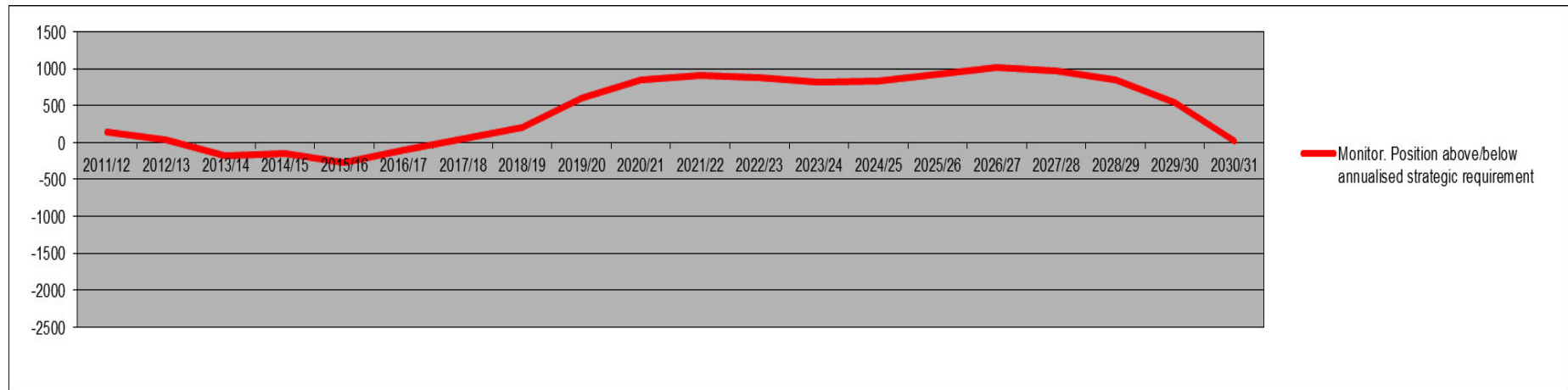


Chart D1 – housing trajectory 2014-31

Chart D2 – over-under provision against requirement



2014-base 1-10-14 update	Actual			Projected																	Totals
	2011	2012	2013	Years 1-5					Years 6-10					Years 11-15							2030
Year from April...	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	
Gross completions 2011-2013	745	491	366																		1236
Losses 2011-2013	22	16	7																		38
Net completions 2011-2013	723	475	359																		1557
Gross projected completions (large PP sites) (1)				517	332	629	517	501	453	272	165	130	120	120	120	120	6	0	0	0	4002
Losses				2	8	15	2	0	0	0	0	0	0	0	0	0	0	0	0	0	27
Net projected completions (large PP sites)				515	324	614	515	501	453	272	165	130	120	120	120	120	6	0	0	0	3975
NP sites (gross) (2)				0	23	35	115	104	95	80	38	25	15	91	0	0	0	0	0	0	621
NP sites (loss)				0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
NP sites (net)				0	23	35	115	104	95	80	38	25	15	90	0	0	0	0	0	0	620
Gross projected completions (large HELAA sites) (3)				0	16	16	12	35	150	135	55	25	0	50	50	50	50	0	0	0	644
Losses									7					10							17
Net projected completions (large HELAA sites)				0	16	16	12	35	143	135	55	25	0	40	50	50	50	0	0	0	627
Total Net Large site completions				515	363	665	642	640	691	487	258	180	135	250	170	170	56	0	0	0	5222
Small site projected implementation (4)				103	82	54	14	2	0	0	0	0	0	0	0	0	0	0	0	0	255
Windfall (5)				0	8	37	76	87.9	90	90	90	90	90	90	61	61	61	61	61	61	1114
Total projected net completions (6)				618	453	755	732	730	781	577	348	270	225	340	231	231	117	61	61	61	6591
Net additions from T&P allocations (7)	0	0	0	0	0	0	0	0	0	35	35	35	35	35	35	35	25	0	0	0	270
Projected net total completions including T&P allocations(8)	0	0	0	618	453	755	732	730	781	612	383	305	260	375	266	266	142	61	61	61	6861
Strategic allocations																					
Angmering				0	0	0	0	0	0	15	50	50	50	33							198
Barnham/Eastergate/ Westergate									200	200	200	200	200	200	200	200	200	200			2000
Littelhampton/Ford/Fontwell															200	200	200	200	200	0	1000
Net completions plus strategic allocations	723	475	359	618	453	755	732	730	981	827	633	555	510	608	666	666	542	461	261	61	11616
SHMA-based annual housing requirement	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	580	11600
Rolling Housing Land Supply																					
Annual completions minus requirement	143	-105	-221	38.15	-127	175	152	150	401	247	53	-25	-70	28	86	86	-38	-119	-319	-519	16
Cumulative net completions	723	1198	1557	2175.2	2628.2	3383.2	4115.2	4845.2	5826.2	6653.2	7286.2	7841	8351.2	8959.2	9625	10291.15	10833.15	11294	11555	11616	
Cumulative SHMA-based requirement	580	1160	1740	2320	2900	3480	4060	4640	5220	5800	6380	6960	7540	8120	8700	9280	9860	10440	11020	11600	
Rolling balance of supply minus requirement	143	38	-183	-145	-272	-97	55	205	606	853	906	881	811	839	925	1011	973	854	535	16	
Affordable housing																					
Affordable housing completions from permitted sites (9)	329	205	110	188	187	57	138	74	66	39	30	0	0	0	0	0	0	0	0	0	1423
Affordable housing from HELAA sites				0	5	5	4	11	43	41	17	8	0	12	15	15	15	0	0	0	188
Affordable housing from NP sites				0	0	7	11	35	31	29	24	11	8	5	27	0	0	0	0	0	186
Affordable housing from T&P allocations (10)				0	0	0	0	0	0	11	11	11	11	11	11	11	8	0	0	0	81
Affordable housing from strategic allocations (11)				0	0	0	0	0	60	65	75	75	75	70	120	120	120	120	60	0	959
Total affordable housing completions	329	205	110	188	199	72	176	116	197	179	143	101	90	119	146	146	143	120	60	0	2838

Notes
(1) All sites listed in annex A, appendix A
(2) Sites allocated in examined NPs as at 1-10-14 - listed in Annex A, appendix A and table B2, appendix B
(3) Listed in Annex and table B2, appendix B
(4) Table CA2, annex C, appendix A
(5) See para 3.6
(6) Large site completions plus NP site completions plus small site completions plus windfall
(7) Provision for H SP1 T&P allocations in unexamined NPs - see para 3.26 and table B1 appendix B
(8) Projected net completions plus net additions from T&P allocations
(9) Listed in appendix C
(10) 30% of net T&P allocations
(11) 30% of strategic allocations

Table D2 – Housing trajectory base data including affordable housing

5 year housing land supply projections

5 year housing land requirement (1)				3083	3045	3172	2997	2845	2695	2294	2047	1994	2019	2089	2061	1975
Projected annual requirement (2)				616.6	608.97	634.37	599.37	568.97	538.97	458.77	409.3	398.	403.77	417.77	412.17	394.97
Projected available 5 year supply(3)				3288	3651	4025	3903	3726	3506	3133	2972	3005	2992	2943	2596	1991
Projected number of years supply (4)				5.33	6.00	6.34	6.51	6.55	6.51	6.83	7.26	7.54	7.41	7.04	6.30	5.04
Projected 5 year requirement +5%				3237	3197	3330	3147	2987	2830	2409	2149	2094	2120	2193	2164	2074

Notes: (1) (580x5) - 'above/below requirement' total for previous year (2) Projected requirement/5 (3) Projected supply for the year and following 4 years (4) Projected supply/ annual requirement

Table D3 – Rolling 5 year housing land supply projections

Background Paper 5: Equalities Impact Assessment for ADC Publication Version Local Plan (2011-2031)

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Arun Local Plan 2011 – 2013 Publication Version

EQUALITIES IMPACT ASSESSMENT

FINAL DRAFT

**ARUN LOCAL PLAN 2011 – 2031 PUBLICATION VERSION
EQUALITIES IMPACT ASSESSMENT**

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ARUN LOCAL PLAN 2011 – 2031 PUBLICATION VERSION**EQUALITIES IMPACT ASSESSMENT**

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1. INTRODUCTION

Legal Background

- 1.1 The Planning Inspectorate's Soundness Guidance for Development Plan Documents (August 2009) identifies the Equality Impact Assessment as 'material necessary for the examination'. Equality Impact Assessments (EqIAs) address a local authority's duty to carry out race, disability and gender impact assessments as required Equalities Act 2010

Purpose of an Equalities Impact Assessment

- 1.2 An impact assessment is a way of determining whether a policy (or proposed policy) impacts on different groups of people in different ways. It should be embedded in the normal policy making process.
- 1.3 The benefit of conducting an Equalities impact Assessment is that we can:
- Take into account the needs, experiences and circumstances of specific groups of people who will be affected by our policies;
 - Identify any inequalities people will experience if the policies are implemented;
 - Think about the ways in which we can achieve the aims of our policy which will not lead to inequalities;
 - Increase transparency in the things that we do and improve the public's confidence in the fairness of our policy;
 - Generally develop better policy-making, procedures and services; and
 - Become more accountable to the people that we serve.

2. THE METHODOLOGY FOR THE EQUALITIES IMPACT ASSESSMENT

- 2.1 Arun District Council has adopted the Equality Standard for Local Government. It has also developed a toolkit to guide the preparation of Equality Impact Assessments and this has been adopted in this assessment for the Arun Local Plan.
- 2.2 There is a two stage process to the Equalities Impact Assessment. The first stage, or screening stage, identifies positive or negative impacts of the proposed policies of the Local Plan on the equality target groups and identifies any gaps in knowledge. If any negative impacts are identified that are considered of high significance and/or if the impact is not intended or illegal then a full stage 2 assessment will need to be undertaken.
- 2.3 The assessment takes into account the particular needs of each “protected characteristic” within a community. For the purpose of this assessment, and to reflect the corporate approach within the council the following equality groups are identified:
- Age
 - Disability
 - Gender
 - Gender Reassignment
 - Race
 - Religion or belief
 - Sexual Orientation
 - Pregnancy and Maternity
 - Marriage and Civil Partnership
- 2.4 In addition, a Human Rights category has been added in order that policies can be assessed against their implications for human rights.
- 2.5 A brief outline of each of these equality target groups is given below. This will provide a basis for refining the assessment of impacts which are likely to arise from the policies contained within the Local Plan.
- Age**
- 2.6 Arun has one of the UK’s highest populations of elderly people, with in excess of 34% of residents being over the age of 60, compared to 22.4% nationally.¹ Particularly high proportions of older people are found along the coast, in the Pagham/Aldwick area west of Bognor Regis, and from Rustington to Ferring, where in some wards over 50% of residents are over 60 years old.
- Disability**
- 2.7 The higher proportion of older people will affect figures for the number of people with disabilities. Arun also has high levels of benefit claimants who are sick and disabled, especially in deprived wards where concentrations are the highest in West Sussex.

¹ 2011 Census – Age Structure (ONS)

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- 2.8 At the 2011 Census 21.1% of Arun's population had a limiting long term illness. This was higher than both the regional (15.47%) and national (17.93%) levels.

Gender

- 2.9 The 2011 Census figures show that the population at Arun was 149,518. Of this, 52.31% were female, which compared with 50.8% for England.

Gender Reassignment

- 2.10 There is no reliable local data on gender reassignment.

Race

- 2.11 According to the 2011 census the local population is relatively under represented by ethnic minorities. 91.6% of the population in Arun described themselves as White British compared to 79.8% in England. The largest other ethnic groups included: Other White with 7043 persons (4.7%); White Irish with 889 (0.6%); Mixed 1502 (1%); Asian or Asian British 1704 (1.1%); Black or Black British 538 (0.3%); and Chinese or other Ethnic Group 584 (0.4%).

Religion or belief

- 2.12 At the 2011 census the vast majority of Arun's residents described themselves as Christians. Most other faiths and beliefs were generally under represented when compared to the national figures. This is reflected in the table below.

Table: Religion of Arun Residents compared to England, 2001

Stated Religion	Percentage	
	Arun	England
Christian	65.3	59.4
Buddhist	0.3	0.5
Hindu	0.2	1.5
Jewish	0.2	0.5
Muslim	0.5	5.0
Sikh	0.0	0.8
Other religions	0.5	0.4
No religion	25.3	24.7
Religion not stated	7.7	7.2

Source: 2011 Census

Sexual Orientation

- 2.13 There is only limited local data on sexual orientation. At the 2011 Census 332 people in Arun district were in a registered same sex civil partnership. This represented 0.26% of all people aged 16 and over in the district. This figure was slightly above the national level at 0.23%.

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Pregnancy and Maternity

- 2.14 At the 2011 Census the birth rate in Arun was close to the national and regional average. Conception rates are above the national and regional frequencies while maternity rates show an opposite pattern

Area	Birth rate/1000	Conception Rate/1000	Maternity Rate/1000
England	64.3	30.7	15.6
South East	63.8	26.1	15.6
West Sussex	63.4	24.6	11.3
Arun	64.5	32.6	9.4

Marriage and Civil Partnerships

- 2.15 The Census 2011 provides data on marital status. Arun appears to have more people in a marriage or civil partnership compared to the South East and England. Those households who are divorced/dissolved from a civil partnership or widowed tend to be higher in Arun compared to the county, region or England.

Category/Area	England	South East	West Sussex	Arun
Single	34.6	31.9	28.8	26.8
Married	46.6	49.3	50.6	50.0
Same Sex Civil Partnership	0.2	0.2	0.2	0.3
Separated	2.7	2.5	2.5	2.6
Divorced/Dissolved	9.0	9.1	9.7	10.5
Widowed/Surviving Partner	6.9	6.9	8.2	9.9

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3. THE SCREENING OF THE LOCAL PLAN

- 3.1 This section assesses the Local Plan utilising Arun District Council's Equalities Impact Assessment Toolkit.

The main aims, purpose and outcomes of the policy and how these fit in with the wider aims of the organisation

- 3.2 The Local Plan is a statutory document. It sets out the overall vision and strategy for place making in Arun.
- 3.3 The Local Plan sets out the Council's approach for accommodating strategic growth within the district for the period up to 2031. It sets out the spatial vision for the future development of the district, and identifies objectives and policies to assist in the achievement of this vision.
- 3.4 The Local Plan has seven strategic objectives. These are:
- To strengthen Arun's economic base and provide local job opportunities by increasing, diversifying and improving the quality of employment within the district through the provision of appropriate employment sites, better infrastructure including road access, quality affordable accommodation and the development of business support and partnerships;
 - To reduce the need to travel and promote sustainable forms of transport;
 - To plan for climate change and work in harmony with the environment to conserve natural resources and increase biodiversity;
 - To plan and deliver a range of housing mix and types in locations with good access to employment, services and facilities to meet the district's housing requirements and the needs of Arun's residents and communities both urban and rural, ensuring that issues of affordability and the provision of appropriate levels of affordable housing are addressed while supporting the creation of integrated communities;
 - To protect and enhance Arun's outstanding landscape, coastline, historic, built and archaeological environment thereby reinforcing local character and identity;
 - To create vibrant, attractive, safe and accessible towns and villages that build upon their unique characters to provide a wide range of uses and which are a focus for quality shopping, entertainment, leisure, tourism and cultural activities; and
 - To promote strong, well integrated and cohesive communities, through the promotion of healthy lifestyles, provision of good quality accessible community facilities and a safe environment, which delivers an enhanced quality of life to all. This includes meeting the needs of a growing elderly population.
- 3.5 The Local Plan is the spatial interpretation of Arun's Sustainable Community Strategy 'Our Kind of Place'. It will play a key role in delivering the vision for the district that is set out in this document.

How The Local Plan Aims Will Affect the Councils Duty to: Promote Equality of Opportunity?

- 3.6 The Local Plan recognises the different needs and aspirations of different groups within the community and the importance of reflecting these in planning for balanced and integrated communities. For example it recognises the need to plan for the consequences of an ageing population, by providing supported and extra care housing and ensuring better access to healthcare and community facilities.
- 3.7 There is also recognition of the need to plan for more balanced and integrated communities. In order to do this it is necessary to provide the right mix of housing and facilities to cater for people at different stages in their life cycle, and with different incomes and needs. This will require providing more affordable housing, more family housing, facilities for children and young people, community and religious meeting places and a wider range of employment opportunities for people of working age.
- Eliminate Discrimination**
- 3.8 By recognising the different needs of different groups the Local Plan will make a contribution to eliminating discrimination. It recognises that planning for new development is not just about housing numbers but about building communities. The Local Plan acknowledges that supporting infrastructure must relate to the needs of a diverse population and provide benefit for all residents and communities across the district.
- Eliminate Harassment**
- 3.9 By promoting inclusive communities and recognising the diverse needs of the different communities within the district the Local Plan will assist in providing the conditions to help eliminate harassment.
- Promote Good Community Relations**
- 3.10 The Council's Statement of Community Involvement (SCI) sets out the minimum standards for consultation regarding the development of the Local Plan. The SCI confirms the aim to engage with different sections of the community, including 'hard to reach groups' such as minority ethnic groups, gay and lesbian people, older people, those with disabilities and younger people. Specific targeted action is taken to engage with such groups.
- 3.11 The Local Plan seeks to plan for balanced and integrated communities and this will promote good community relations. The aim is to meet the specific housing (including affordable housing) and accommodation needs and community infrastructure needs of all Arun's residents and communities. It seeks to improve access to health facilities, particularly for disadvantaged groups and in deprived areas.
- 3.12 The Local Plan recognises that the Council must engage with Black and Minority Ethnic (BME) communities to identify particular housing and support needs and take action to ensure that these are met through working with communities and partner agencies.

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Encourage Participation of disabled people

- 3.13 The Council's SCI (see paragraph 3.10 above) identifies people with disabilities as a 'hard to reach group' and identifies specific targeted action to improve engagement with them. This includes the use of the Council's website for consultation, meetings in easy access locations, and the use of large print and audio versions of consultation material.

Consider more favourable treatment of disabled people

- 3.14 The Local Plan reflects the need to plan for the needs of all groups. For example it promotes standards regarding the proportion of new housing that is accessible to wheelchair users. In planning for future infrastructure the aim is to address the needs of the wide range of different groups, including those with disabilities. It is also proposed to improve access to health facilities, particularly for disadvantaged groups.

Protect and promote human rights

- 3.15 By promoting inclusive communities and addressing the needs of a diverse community the Local Plan protects and promotes human rights.

- 3.16 **What aspects of the Local Plan, including how it is delivered, or accessed, could contribute to inequality (to include all areas of operation, including human rights)?** Table 1 assesses each proposed policy contained in the Local Plan to determine its potential impact on inequality.

Will the Local Plan have an impact (positive or negative) upon the lives of people, including members of particular communities and groups? What evidence is there for this?

- 3.17 Table 1 assesses each proposed policy contained in the Local Plan to determine its potential impact upon the lives of people, including members of particular communities and groups.

What different needs, experiences or attitudes are particular communities or groups likely to have in relation to the Local Plan?

- 3.18 The Local Plan recognises that in building sustainable, balanced and cohesive communities it is necessary to recognise the different needs of different groups. This includes in relation to housing and community needs.
- 3.19 In order to fully appreciate these differing needs the Local Plan has been subject to considerable community engagement and consultation during the various stages of its production. The minimum standards for this are set down within the 'Statement of Community Involvement' which itself was subject to consultation.
- 3.20 Consultation methods are varied in order to reach a wide range of different groups and individuals and include web based consultation; leaflet distribution; the use of displays at key locations and media coverage.

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Assessment of Local Plan Policies

- 3.21 Table 1 provides the screening information for the individual local plan policies. The key to the table is provided below.

Key to Table 1

Symbol	Likely Impact Relative to Other Groups
+	Positive
0	Neutral/Negligible
-	Negative
N/A	Not applicable

The table is coded as follows:

1. Age
2. Disability
3. Gender
4. Gender Reassignment
5. Race
6. Religion or belief
7. Sexual Orientation
8. Pregnancy and Maternity
9. Marriage and Civil Partnership
10. Human Rights

- 3.22 The assessment indicates that there are five policies that have the potential to impact to a greater extent on some groups. These policies are:

- Strategic Housing, Parish and Town Council Allocations
- Affordable Housing
- Independent Living and Care Homes
- Traveller Accommodation
- Housing Mix

- 3.23 Whilst in each case this is a positive impact it nevertheless means that there is a potential to 'exclude' other groups. Consequently, it is appropriate to go to the next, scoping, stage of the equalities impact assessment in section four of this report.

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Table 1: Equalities Impact Assessment for Arun Local Plan (Note: The policies as listed in the following table are summaries of the actual wording for these policies as included in the Local Plan and, in this regard must be read in conjunction with the text of the Local Plan).

Policy	Equalities Groups										Commentary
	1	2	3	4	5	6	7	8	9	10	
SUSTAINABLE PLACE											
<p>SD SP1 Sustainable Development</p> <p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.</p>	0	0	0	0	0	0	0	0	0	0	<p>Giving priority to development in more accessible locations closer to facilities and services should reduce the need to travel and will benefit all groups. It may have a limited degree of disproportionate benefit to those groups who tend to experience lower rates of car ownership, such as people with disabilities, older and younger people.</p>
<p>SD SP2 Built-up Area Boundary</p> <p>Development will be permitted within the area defined as the Built-Up Area Boundary, subject to all other policies in this Local Plan.</p>	0	0	0	0	0	0	0	0	0	0	<p>Giving priority to development in more accessible locations closer to facilities and services should reduce the need to travel and will benefit all groups. It may have a limited degree of disproportionate benefit to those groups who tend to experience lower rates of car ownership, such as people with disabilities, older and younger people.</p>
<p>CSP1 Countryside</p> <p>Development proposed outside the Built Up Area Boundary would need to contribute to the rural economy, quiet informal recreation and should not have a detrimental impact on the</p>	0	0	0	0	0	0	0	0	0	0	<p>There is a possibility that focussing development in the built up urban boundary of the district's towns and villages may adversely impact those in the community who have place based needs in the District's countryside. The Local Plan's policies for</p>

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Policy	Equalities Groups										Commentary	
	1	2	3	4	5	6	7	8	9	10		
countryside and landscape character to provide better management of the urban-rural fringe as well as the countryside as a whole.												housing, employment, transport/access, space/design standards, green infrastructure and delivery of facilities through various funding routes aim to meet the needs of isolated rural communities.
<p>GI SP1 Green Infrastructure and Development</p> <p>All development proposals must be designed to protect and enhance existing green infrastructure assets and should be fully incorporated into the district's green infrastructure network through the identification and delivery of new links within the existing network.</p>	0	0	0	0	0	0	0	0	0	0	This policy would benefit all groups within the community. It will provide improved access to new open space facilities for local residents.	
<p>SD SP3 Gaps Between Settlements</p> <p>Development will only be permitted in the areas identified on the policies maps where there is no risk of coalescence and to ensure retention of the separate identities of the villages and/or towns of the District.</p>	0	0	0	0	0	0	0	0	0	0	This policy aims to retain open land between settlements and prevent coalescence so they retain their own identity and landscape settings. This will be of benefit to all groups within the community. Where appropriate the management of specific needs will provided for by the other policies of the local plan (see commentary on Policy CS SP 1 above	
<p>LAN DM1 Protection of Landscape Character</p> <p>Development will be permitted where landscape character is conserved or enhanced; the historic character and development pattern of settlements is respected; and either development does not lead to coalescence of settlements.</p>	0	0	0	0	0	0	0	0	0	0	Setting landscape standards for new development and seeking to avoid coalescence of settlements will ensure high environmental quality and maintain access to the open countryside. This will benefit all groups to the same extent.	

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Policy	Equalities Groups										Commentary	
	1	2	3	4	5	6	7	8	9	10		
<p>LAN DM2 The Setting of Arundel</p> <p>No development will be permitted, within the area as shown outlined on the Proposals Map, which would adversely affect views of Arundel or its special setting.</p>	0	0	0	0	0	0	0	0	0	0	0	This policy will benefit all groups by continuing to improve the quality of the environment by only permitting development which would not adversely affect a sensitive part of the district of Arun.
PROSPEROUS PLACE												
<p>EMP SP1 Employment Land Provision</p> <p>The Council will promote the sustainable growth of the district's economy by supporting the provision of a flexible supply of land to meet the varying needs of different economic sectors.</p> <p>Employment sites will be protected for the plan period; subject to review within an update the Council's Employment and Economic Land Assessment. New employment sites will meet a range of criteria.</p>	0	0	0	0	0	0	0	0	0	0	0	Employment provision on a range of accessible locations will have widespread benefit across all groups. The affect for all groups is likely to be the same.
<p>Emp SP2 Strategic Employment Land Allocations</p> <p>The Council will support employment land brought forward on a scale and in locations consistent with the strategy and these will be protected for the plan period.</p>	0	0	0	0	0	0	0	0	0	0	0	Employment provision on a range of accessible locations will have widespread benefit across all groups All sections of the community will benefit from this policy as it promotes employment. It will have a positive impact on the social and economic prospects of the District. The affect for all groups is likely to be the same.

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<p>Emp DM1 Employment Land: Development Management</p> <p>The Council will seek to protect and enhance existing employment sites and premises. It will also promote and support positive measures to upgrade existing employment areas.</p> <p>Also, the Council will positively encourage the relocation (within Arun) of existing firms wishing to expand and locally non-conforming uses.</p> <p>The Council will seek to direct office development to the town centres. The Bognor Regis Enterprise employment area identified on the Proposals Map will also be considered as a suitable location for office development.</p> <p>Where appropriate the Council will require the provision of a range of unit sizes including small and medium sized business units and live-work units in new economic development and mixed-use sites to ensure the needs of businesses are met.</p> <p>Economic Growth Outside the Built up Area Boundary</p> <p>Planning permission will be granted to local firms, currently located within the District, proposing development on sites outside the built-up area, provided that the proposal satisfies certain criteria.</p> <p>Proposals for conversion of buildings for industrial or business</p>	0	0	0	0	0	0	0	0	0	0	<p>Employment provision on a range of accessible locations will have widespread benefit across all groups.</p> <p>Protecting and enhancing existing employment sites will have widespread benefit across all groups. Reducing the loss of job creating land uses will be of benefit to all sections of the community seeking employment and integrated balanced communities. It will have a positive impact on socio-economic status by improving economic prosperity and reduce social exclusion.</p> <p>The policy recognises the value of employment activity across the district and, with specific sector policies, sets out to enable the creation of benefits for all groups within the community.</p>

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<p>uses outside the built up area and agricultural buildings will be permitted subject to certain criteria also.</p> <p>Proposals for farm shops outside of the built up area boundary will be allowed subject to certain criteria.</p>											
<p>EMP DM2 Enterprise Bogor Regis (EBR)</p> <p>Outlines the approach towards ensuring the delivery of 4 sites to help create employment in the District and benefit the wider Coastal West Sussex partnership area. A number of infrastructure elements are identified as follows:</p> <ul style="list-style-type: none"> • Transport mitigation and improvements • Flood defence and flood mitigation works • Sewerage system connections on or off-site <p>It emphasises that development has to be considered and developed comprehensively.</p>	0	0	0	0	0	0	0	0	0	0	<p>Employment provision within BREZ will contribute to the range of accessible locations outlined in Policy EMP SP1 and 2 to generate widespread benefit across all groups. The affect for all groups is likely to be the same. EBR can help to strengthen and diversify the employment opportunities within the District. The development of the site can towards the regeneration of the local economy, offering local employment, tackle deprivation and address the high levels of commuting from the District.</p>
<p>EMP DM3 Littlehampton Harbour</p> <p>Development will be encouraged which delivers the comprehensive safeguarding of the harbour including addressing flood risk, contamination, access and nature conservation issues.</p>	0	0	0	0	0	0	0	0	0	0	<p>The regeneration of Littlehampton Harbour fits with the Local Plan's spatial approach to give priority to development in more accessible locations closer to facilities and services should reduce the need to travel and will benefit all groups.</p>

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<p>EMP DM4 Knowledge and Cultural Based Economic Growth</p> <p>The Council will work with partners to enhance local employment opportunities within the Economic. The priority centres for the promotion of these sectors are:</p> <ol style="list-style-type: none"> 1. Littlehampton Economic Growth Area; and 2. Bognor Regis Economic Growth Area <p>The Council will work with partners and developers to enhance the knowledge and skills and local employment opportunities for residents.</p>	0	0	0	0	0	0	0	0	0	0	<p>Employment provision on a range of accessible locations will have widespread benefit across all groups. The affect for all groups is likely to be the same.</p> <p>The policy recognises the value of employment activity across the district and, with specific sector policies, sets out to enable the creation of benefits for all groups within the community.</p>
<p>SKILLS SP1 Employment and Skills</p> <p>The Council wishes to introduce skills and employment plans for major developments in the District in order to use the opportunities presented by development to improve local employment and training.</p>	0	0	0	0	0	0	0	0	0	0	<p>This policy aims to address the longstanding problems in the District with poor qualifications and skills which act as barriers to people accessing work and support local enterprise. This includes the opportunity to retrain. The affect for most groups is likely to be the same.</p>
<p>TEL SP1 Strategic Delivery of Telecommunications Infrastructure</p> <p>Access to high quality communications infrastructure, including broadband will be encouraged.</p>	0	0	0	0	0	0	0	0	0	0	<p>In promoting a better quality of life, through improved communications, the affect for all groups is likely to be the same.</p>

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<p>TEL DM1 Telecommunications</p> <p>Permission for telecommunications development will be granted, subject to certain criteria.</p>	0	0	0	0	0	0	0	0	0	0	0	In promoting a better quality of life, through improved communications, the affect for all groups is likely to be the same.
<p>RET SP1; Retail Hierarchy of Centres</p> <p>The hierarchy of centres, including district town centres (Bognor Regis and Littlehampton), large service Centres (Rustington), service centre (Arundel), village and suburban centres in Arun will be maintained by supporting and promoting measures which reinforce their role in meeting community needs and providing a focus for a range of activities including: retail, leisure, commercial, office, tourism, cultural, community and residential development. This range of activities will promote economic resilience for the vitality of our centres.</p>	0	0	0	0	0	0	0	0	0	0	0	<p>By focusing major development in the main existing centres that are the most accessible locations this policy will have widespread benefit and the affects on all groups is likely to be the same.</p> <p>The policy recognises the value of employment activity across the district and, with specific sector policies, sets out to enable the creation of benefits for all groups within the community.</p>
<p>RET DM1 Retail Development</p> <p>Retail development which accords with the retail hierarchy will be permitted subject to certain criteria.</p>	0	0	0	0	0	0	0	0	0	0	0	By focusing major development in the main existing centres that are the most accessible locations this policy will have widespread benefit and the affects on all groups is likely to be the same.
<p>TOU SP1 Sustainable Tourism and the Visitor Economy</p> <p>Sustainable tourism growth for Arun's requires the protection of the features that make the district attractive to visitors. Proposals for visitor related development will be determined</p>	0	0	0	0	0	0	0	0	0	0	0	All sections of the community are likely to benefit from an enhanced range of facilities. Employment opportunities are likely to add to local economic diversity and benefit all groups.

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having regard to Arun's capacity to absorb such growth.												The policy recognises the value of employment activity across the district and, with specific sector policies, sets out to enable the creation of benefits for all groups within the community.
<p>TOU DM1 Tourism Related Development</p> <p>All proposals for development, including expansion, which are likely to attract visitors will demonstrate that they are in accessible locations and will be accompanied by workable and realistic travel plans as well as addressing visitor management issues and achieving good design.</p> <p>When assessing proposals for visitor attractions, facilities or accommodation outside of the Built Up Area Boundary these will generally be expected to be small-scale and relate to quiet, informal recreation and enjoyment of Arun's countryside. However, there may occasionally be circumstances where larger scale facilities may be appropriate where they are associated with enhancing visitor use or appreciation of a specific feature or location.</p> <p>In all cases, development in the countryside will need to demonstrate that it required and is compatible with its countryside location and is sensitively designed to minimise potential impact on the countryside.</p>	0	0	0	0	0	0	0	0	0	0	All sections of the community are likely to benefit from an enhanced range of facilities. Employment opportunities are likely to add to local economic diversity and benefit all groups.	

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<p>SO DM1 Soil</p> <p>Unless designated by this Plan or a Neighbourhood Development Plan, the use of Grades 1, 2 and 3a of the Agricultural Land Classification for any form of development not associated with agriculture or forestry will not be permitted unless need for the development outweighs the need to protect such land in the long term. Where development is permitted it should, as far as possible, use the lowest grade of land suitable for that development.</p>	0	0	0	0	0	0	0	0	0	0	0	By only permitting development on low grade soil as far as practical, the higher quality soil is protected for agricultural and related purposes. This would benefit all groups to a similar extent.
<p>HOR DM1 Horticulture</p> <p>New glasshouse, polytunnel and packhouse development and the redevelopment of under-used, redundant or derelict glasshouses will be permitted subject to certain criteria.</p>	0	0	0	0	0	0	0	0	0	0	0	<p>Arun has a high reliance on horticulture and related activities. Employment opportunities are likely to add to local economic diversity and benefit all groups.</p> <p>The policy recognises the value of employment activity across the district and, with specific sector policies, sets out to enable the creation of benefits for all groups within the community.</p>
<p>RET DM2 Garden Centres</p> <p>Outside the built-up area, proposals for new garden centres, or the extension of existing garden centres with agreement from the Environment Agency, will be permitted subject to certain criteria.</p>	0	0	0	0	0	0	0	0	0	0	0	<p>. Employment opportunities relating to garden centres are likely to add to local economic diversity and benefit all groups.</p> <p>The policy recognises the value of employment activity across the district and, with specific sector policies, sets out to enable the creation of benefits for all groups within the community.</p>

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EQU DM1 Equine Development Non-residential planning permission will be granted for horse related activities subject to certain criteria.	0	0	0	0	0	0	0	0	0	0	0	In promoting non-residential, horse related activities, it is considered that this policy would benefit all groups.
LIVING PLACE												
H SP1 Strategic Housing, Parish and Town Council Allocations Up to 4,080 additional homes will be provided in the district over the period 2013-2028. Both strategic and parish/town allocations are identified.	+	+	0	0	-	0	0	0	0	0	0	Providing additional housing that meets the needs of the whole community, including specific groups, will have a significant and positive impact to all groups. Providing additional homes may benefit lower income families by helping them to access the housing market. There is a possibility that focussing housing

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												development in strategic allocations may adversely impact those community groups who require housing in other areas (for example the rural areas). However, the other Local Plan policies for the delivery of housing needs does set out mechanisms for the provision of housing in other areas (for example rural housing and exception sites to meet particular needs and support important sectors to the local economy). In regard to “race”, shown as “-“ in column 5, includes a reference to gypsy and traveller accommodation. This matter is dealt with in Policy HSP5 of the Local Plan.
H DM1 Housing Mix In order to promote diversity in all future development proposals a housing mix, in both housing types and sizes shall be particularly encouraged. Such a mix shall be informed by the findings of the emerging ‘Strategic Housing Market Assessment’ report	+	+	0	0	-	0	0	0	0	0	0	This policy seeks additional housing provision, including for all sections of the community. The policy is of high relevance to the young, older people and people with disabilities. Evidence suggests that those from ethnic minorities are disadvantaged in the housing market and so would benefit from measures to improve housing provision. In regard to “race”, shown as “-“ in column 5, includes a reference to gypsy and traveller accommodation. This matter is dealt with in Policy HSP5 of the Local Plan.
H SP2 Affordable Housing The Council will require a certain percentage of affordable housing which will relate directly to the size of the development being proposed.	+	+	0	0	-	0	0	0	0	0	0	The policy aims to promote affordable housing and will assist in developing balanced communities with a mix of people. This policy is of high relevance to those on lower incomes. It will have a positive impact on young people and will

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												reduce social exclusion. Affordable housing will be built to lifetime home standard having an positive impact on elderly people and those with a physical disability In regard to “race”, shown as “-“ in column 5, includes a reference to gypsy and traveller accommodation. This matter is dealt with in Policy HSP5 of the Local Plan.
H SP3 Rural Housing and Exception Sites To increase the supply of affordable housing in rural areas by identifying sites in certain areas that are suitable for community-led affordable housing, including rural ‘exception sites’.	0	0	0	0	0	0	0	0	0	0	0	This policy seeks additional housing provision within rural locations. The policy benefits people who wish to remain living within their local community. The affects on all equality groups is likely to be the same.
H SP4 Houses in multiple occupation (HMOs) The aim of this policy is to manage the development of HMOs within the District. Planning applications for HMOs will be favourably considered subject to meeting a number of requirements to manage amenity, parking, open space and waste/refuse issues.	0	0	0	0	0	0	0	0	0	0	0	The policy recognises the value of HMOs and their role in providing housing choice across the District. . The affects on all equality groups is likely to be the same.
H DM2 Independent Living and Care Homes Given the age profile of Arun, this policy aims to actively encourage the establishment of independent living and care homes at appropriate locations throughout the district that meet the needs of the community.	+	+	0	0	-	0	0	0	0	0	0	This policy promotes the establishment of new and extended independent living and care homes to meet the needs of the district. The policy particularly benefits the older age group in Arun. The policy will have a positive impact on those with a physical disability or who are elderly by

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												<p>providing for developments that will help provide adaptable and flexible living space. Although extra care homes are specifically aimed at older people their provision will potentially free up existing housing for others having a positive effect on all the equalities groups</p> <p>In regard to “race”, shown as “-“ in column 5, includes a reference to gypsy and traveller accommodation. This matter is dealt with in Policy HSP5 of the Local Plan.</p>
<p>H SP5 Traveller Accommodation</p> <p>The policy sets the criteria for traveller and travelling showpeople accommodation sites.</p>	0	0	0	0	+	0	0	0	0	+	<p>Travellers are a recognised group and this policy is aimed at addressing their specific accommodation needs.</p>	
<p>H DM3 Agricultural, Forestry and Horticultural Worker’s Dwellings</p> <p>This policy recognises the need for certain types of dwelling that cannot be accommodated within the built up area boundary. The policy sets criteria for agricultural, forestry and horticultural worker’s dwellings</p>	0	0	0	0	0	0	0	0	0	0	<p>There is a recognised need to accommodate a variety of workers within Arun which this policy seeks to address.</p> <p>The policy recognises the value of housing close to employment activity in the rural parts of the district.</p>	
<p>D SP1 Design</p> <p>This policy recognises the need for a high standard of quality design in all future development proposals.</p>	0	0	0	0	0	0	0	0	0	0	<p>This policy may be applied to all development proposals. Placing people’s needs at the beginning of design can have a positive affect for particular equalities groups.</p>	

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<p>D DM1 Aspects of Form and Design Quality</p> <p>A number of design based criteria are mentioned in this policy including character, appearance, crime prevention, protection of trees etc</p>	0	0	0	0	0	0	0	0	0	0	0	This policy may be applied to all development proposals. Placing people's needs at the beginning of design can have a positive affect for particular equalities groups
<p>D DM2 Internal Space Standards D DM3 External Space Standards</p> <p>These policies recognise the need for minimum standards of both internal and external space in the interests of promoting better living environments.</p>	0	0	0	0	0	0	0	0	0	0	0	This policy may be applied to all development proposals and does not single out any one group within Arun.
<p>D DM4 Extensions and Alterations to Existing Buildings (residential and non-residential)</p> <p>A set of criteria is included in this policy to assist in the determining of planning applications for extensions</p>	0	0	0	0	0	0	0	0	0	0	0	This policy may be applied to all development proposals and seeks to encourage high quality design as part of all future developments. . Placing people's needs at the beginning of design can have a positive affect for particular equalities groups

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<p>ECC SP1 Adapting to Climate Change</p> <p>The level of energy and water consumption and the production of waste will be reduced by promoting high standards of energy efficiency and efficient water use in development. New buildings will be required to meet standards for carbon emissions.</p>	0	0	0	0	0	0	0	0	0	0	0	Mitigating and adapting to climate change will help to manage costs and have environmental benefits that will have a positive impact on all groups within the community.
<p>ECC SP2 Energy and Climate Change Mitigation</p> <p>This policy promotes energy efficiency measures in all residential and commercial development in order to meet code level 3 or 4 Code for Sustainable Homes</p>	0	0	0	0	0	0	0	0	0	0	0	Mitigating and adapting to climate change will help to manage fuel costs and have environmental benefits that will have a positive impact on all groups within the community.
<p>ECC DM1 Renewable Energy</p> <p>The Council will support and encourage proposals for the development of new sources of renewable energy generation where there is no adverse impact. All new development will be encouraged to incorporate energy from decentralised and renewable, or low carbon sources.</p>	0	0	0	0	0	0	0	0	0	0	0	Encouraging new sources of renewable energy generation will help to manage fuel costs and have environmental benefits that will have a positive impact on all groups within the community.
<p>HWB SP1 Health and Wellbeing</p> <p>All development should be designed to maximise the impact it can make to promoting healthy communities.</p>	0	0	0	0	0	0	0	0	0	0	0	Using development principles to promote healthy communities will benefit all groups.

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<p>OSR DM1 Open Space, Sport and Recreation</p> <p>The provision and improvement of open space, sports and recreation facilities, safe walking and cycling routes can help to create more active communities. Creating mixed use development that will reduce the need to travel to other uses and improving access to health facilities, particularly for disadvantaged groups and in deprived areas is encouraged through this policy.</p>	0	0	0	0	0	0	0	0	0	0	Standards for open space and sport and recreational facilities are based on a population size criteria meaning that facilities would be spread across the district benefitting all groups to the same extent.
<p>OSR SP1 Allotments</p> <p>A policy to encourage the development and retention of allotments sites</p>	0	0	0	0	0	0	0	0	0	0	Allotment provision forms part of an overall strategic approach to promote health and wellbeing. Using development principles to promote healthy communities will benefit all groups.
CONNECTED PLACE											
<p>T SP1 Transport and Development</p> <p>To ensure that growth in the district reduces congestion and works to tackle climate change and promotes healthy lifestyles, the council will ensure that development contributes to highway improvements and promotes sustainable transport, including the use of low emission fuels, public transport and the cycle and pedestrian network.</p>	0	0	0	0	0	0	0	0	0	0	The provision of necessary infrastructure in parallel with development will benefit all groups in the community.
<p>T DM1 Sustainable Travel and Public Rights of Way</p> <p>New development must ensure ease of movement, prioritising</p>	0	0	0	0	0	0	0	0	0	0	The promotion of sustainable travel and public rights of way will benefit all groups in the community. This policy will also have a positive impact on the environment and climate change.

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safe pedestrian and cycle access to the green infrastructure network and access to public transport and community transport services where a need has been identified. Access to alternative modes of transport including public transport routes, the public right of way network and cycle paths, must be available and accessible to all members of the community.												
<p>T SP1 Littlehampton to Arundel Green Link</p> <p>A new strategic Green Link is proposed between Littlehampton and Arundel, along the River Arun. The main aim of the route is improved access between Littlehampton and Arundel and access to the river Arun which links the coast and the National Park.</p>	0	0	0	0	0	0	0	0	0	0	0	The promotion of this Green Link between Littlehampton and Arundel will benefit all groups in the community. This policy will also have a positive impact on the environment and climate change.
<p>T SP3 Safeguarding the Main Road Network</p> <p>To ensure that improvements necessary to enhance the strategic and supporting road network within the district can be carried out, the lines of a number of major road schemes will be protected from development.</p>	0	0	0	0	0	0	0	0	0	0	0	This policy is aimed at improving the quality of life for all groups including those who work in towns and villages throughout the district that would benefit from road improvements as well as users of the new road infrastructure.
<p>T DM2 Public Car Parks</p> <p>Proposals which involve the loss of existing town centre car parks or town centre parking spaces must be supported by a car parking strategy which may identify the need for provision</p>	0	0	0	0	0	0	0	0	0	0	0	This policy will benefit all groups by providing for appropriately located car parking facilities in close proximity to services, facilities and amenities.

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of town centre parking spaces.												
PROTECTED PLACE												
HER SP1 The Historic Environment The Council will grant planning permission for development proposals that conserve or enhance the historic environment of Arun. The re-use of vacant or underused Listed Buildings or unlisted buildings will be encouraged	0	0	0	0	0	0	0	0	0	0	0	Efforts to protect the built environment and improve areas of poorer environmental quality will have a widespread benefit both geographically and for different equality groups. The implications for all groups are likely to be the same.
HER DM1 Listed Buildings Proposals affecting statutory Listed Buildings will be required to have regard to a number of factors including enhancing the historic character, protecting the architectural and historical integrity of buildings and protecting the setting of buildings.	0	0	0	0	0	0	0	0	0	0	0	Efforts to protect the built environment and improve areas of poorer environmental quality will have a widespread benefit both geographically and for different equality groups. The implications for all groups are likely to be the same.
HER DM2 Locally Listed Buildings or Structures of Character Buildings and Structures of Character and Areas of Special Character will be protected from inappropriate development and enhanced sensitivity, and opportunities will be taken to	0	0	0	0	0	0	0	0	0	0	0	Efforts to protect the built environment and improve areas of poorer environmental quality will have a widespread benefit both geographically and for different equality groups. The implications for all groups are likely to be the same.

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improve areas of poorer environmental quality.												
<p>HER DM3 Conservation Areas</p> <p>Planning permission will normally be granted for proposals within or affecting the setting of a Conservation Area subject to a list of stated criteria.</p>	0	0	0	0	0	0	0	0	0	0	0	Efforts to protect the built environment and improve areas of poorer environmental quality will have a widespread benefit both geographically and for different equality groups. The implications for all groups are likely to be the same.
<p>HER DM4 Areas of Special Character</p> <p>Permission will be granted within areas of special character subject to a range of criteria</p>	0	0	0	0	0	0	0	0	0	0	0	Efforts to protect the built environment and improve areas of poorer environmental quality will have a widespread benefit both geographically and for different equality groups. The implications for all groups are likely to be the same.
<p>HER DM5 Remnants of the Portsmouth and Arundel Canal</p> <p>Development will not be permitted where it would have an adverse impact on the remaining line or configuration of the Canal or features along it.</p>	0	0	0	0	0	0	0	0	0	0	0	Efforts to protect the remnants of the Portsmouth and Arundel Canal will have a widespread benefit. The implications for all groups are likely to be the same
<p>HER DM6 Sites of Archaeological Interest</p> <p>There will be a presumption in favour of the preservation of scheduled and other nationally important monuments and archaeological remains and for those developments that will have an indirect impact on the settings of particular sites, permission will only be granted where it can be demonstrated that development will not be harmful to the archaeological</p>	0	0	0	0	0	0	0	0	0	0	0	Efforts to protect the archaeological heritage of Arun will have a widespread benefit both geographically and for different equality groups. The implications for all groups are likely to be the same.

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interest of these sites												
<p>ENV SP1 Natural Environment Designated Nature Sites Pagham Harbour Appropriate Assessment Non Designated Sites Protection of Trees</p> <p>Arun District Council will encourage and promote the conservation and enhancement of biodiversity and the natural environment through policies for the protection of both designated and non-designated sites and also the protection of trees</p>	0	0	0	0	0	0	0	0	0	0	0	Efforts to protect the natural environment heritage of Arun will have a widespread benefit both geographically and for different equality groups. The implications for all groups are likely to be the same.
<p>ENV DM1 Designated sites of Biodiversity or Geological importance</p> <p>In determining planning applications the Council will seek to conserve and enhance biodiversity and geological conservation interests. Opportunities should be taken to link open spaces to provide a network of green spaces and facilitate species movement.</p>	0	0	0	0	0	0	0	0	0	0	0	Seeking to enhance biodiversity and geological conservation interests will ensure high environmental quality. This will benefit all groups to the same extent.
<p>ENV DM2 Pagham Harbour</p> <p>A policy to avoid, manage and mitigate development impacts</p>	0	0	0	0	0	0	0	0	0	0	0	All sections of society will benefit from this policy which aims to conserve the biological, visual, landscape and heritage value of Pagham Harbour.

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Policy	Equalities Groups										Commentary	
	1	2	3	4	5	6	7	8	9	10		
upon Pagham Harbour, a Special Protection Area, notably for its role in supporting populations of rare birds.												
ENV DM3 Not designated sites (of biodiversity/geological value) A policy to avoid, manage and mitigate development impacts upon Biodiversity Opportunity Areas within the Local Plan area	0	0	0	0	0	0	0	0	0	0	0	All sections of society will benefit from this policy which aims to conserve the biological, visual, landscape and heritage value of Biodiversity Opportunity Areas within the Local Plan area.
ENV DM4 Protection of Trees A policy that aims to protect from damage and/or destruction of protected trees (TPOs), Ancient Woodland, trees within Conservation Areas or contributing to local amenity. To introduce effective tree/woodland management where development is permitted, including replacement.	0	0	0	0	0	0	0	0	0	0	0	The policy will benefit all members of the community by protecting trees, hedgerows and hedgebanks both during and after construction
ENV DM5 Development and biodiversity A policy that aims to manage development to generate net gains in biodiversity and protect existing habitats	0	0	0	0	0	0	0	0	0	0	0	All sections of society will benefit from this policy which aims to conserve and grow the biological, visual, landscape value of the Local Plan area.
W SP1 Water Arun District Council shall encourage water efficiency measures in order to protect the district's water resources and enhance the quality of the water environment.	0	0	0	0	0	0	0	0	0	0	0	Ameliorating the effects of climate change will benefit all groups.

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	1	2	3	4	5	6	7	8	9	10	
<p>W DM1 Water Supply and Quality</p> <p>New development will be required to achieve a decrease in water use and more efficient water use will be promoted in existing developments. Development only permitted where water resources will be provided in time to serve the development, and that provision is not considered detrimental to existing abstractions, river flows, water quality, fisheries, amenity or nature conservation.</p>	0	0	0	0	0	0	0	0	0	0	Ameliorating the effects of climate change will benefit all groups.
<p>W DM2 Flood Risk</p> <p>Flood and erosion risk will be taken into account at all stages in the planning process to avoid inappropriate development in areas at current or future risk, and to direct development away from areas of highest risk.</p>	0	0	0	0	0	0	0	0	0	0	Ameliorating the effects of climate change will benefit all groups.
<p>W DM3 Sustainable Drainage Systems</p> <p>All development must identify opportunities to incorporate a range of Sustainable Drainage Systems, appropriate to the size of the development, in order to increase the levels of water capture and storage and improve water quality.</p>	0	0	0	0	0	0	0	0	0	0	Ameliorating the effects of climate change will benefit all groups.
<p>W DM4 Coastal Protection</p> <p>Proposals for coast protection and sea defence works will be permitted, subject to a stated list of criteria.</p>	0	0	0	0	0	0	0	0	0	0	Ameliorating the effects of climate change will benefit all groups. It will allow natural processes to continue unless safety and economic well being of any coastal

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Policy	Equalities Groups										Commentary	
	1	2	3	4	5	6	7	8	9	10		
												community would be undermined.
NR DM1 Natural Resources and Minerals Safeguarding All new development must show how the use of recycled and secondary materials have been incorporated into the design, in order to reduce the amount of primary materials used.	0	0	0	0	0	0	0	0	0	0	0	The promotion of sustainable building materials, thereby ameliorating the effects of climate change will benefit all groups.
WM DM1 Waste Management Proposals for particular types of development must be supported by an acceptable site waste management plan.	0	0	0	0	0	0	0	0	0	0	0	The promotion of site waste management plans, thereby improving the quality of the environment and ameliorating the effects of climate change will benefit all groups.
QE SP1 Quality of the Environment The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not impact negatively upon residential amenity, the natural environment or upon leisure and recreational activities.	0	0	0	0	0	0	0	0	0	0	0	Giving priority to development in more accessible locations closer to facilities and services should reduce the need to travel and will benefit all groups. It may have a limited degree of disproportionate benefit to those groups who tend to experience lower rates of car ownership, such as people with disabilities, older and younger people.

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Policy	Equalities Groups										Commentary
	1	2	3	4	5	6	7	8	9	10	
<p>QE DM1, QE DM2, QE DM3 Noise Pollution Light Pollution Air Pollution</p> <p>The Council will require that all development proposed is constructed in such a way that noise, light and air pollution are minimised or, limited in certain appropriate circumstances.</p>	0	0	0	0	0	0	0	0	0	0	<p>This policy will benefit all groups by improving the overall quality of the built environment.</p>

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Policy	Equalities Groups										Commentary	
	1	2	3	4	5	6	7	8	9	10		
												DELIVERABLE PLACE
INF SP1 Infrastructure Provision and Implementation The Council will work with utility providers and developers to ensure that where required as part of development new infrastructure is operational no later than the completion for which it is needed. This might be through contributions either related to the site or to the wider community.	0	0	0	0	0	0	0	0	0	0	0	The policy aims to ensure that new development and changes of use create the opportunity to maintain the physical and community infrastructure within the Local Plan area. This will benefit all groups to the same extent, notably those investments with District wide benefits and those that target known needs in localities.

4. SCOPING THE EQUALITY IMPACT ASSESSMENT

- 4.1 There are several policies that have the potential to impact to a greater extent on some groups. These policies are:
- Strategic Housing, Parish and Town Council Allocations
 - Affordable Housing
 - Independent Living and Care Homes
 - Traveller Accommodation
 - Housing Mix
- 4.2 Each of these policies is assessed using the Arun District Council Equalities Impact Assessment – Part 2 template.

Equality Impact Assessment – Part 2

Step 1 – scoping the equality impact assessment (EIA)
Name of Policy
Strategic Housing, Parish and Town Council Allocations
What are the main aims, purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?
Housing is closely linked to employment provision throughout Arun and is a vital part of developing sustainable communities. Housing therefore underpins objectives of the Local Plan such as tackling deprivation, meeting social and community needs, and the overarching aim of building sustainable communities by ensuring that planning is inclusive, taking into account the needs of all members of society.
List the main activities relating to the policy and identify who is likely to benefit from it.
By identifying a number of strategic sites for residential development and proposing town and parish housing allocations, this policy has identified the housing need of the district over the period of the Plan. The policy aims to accommodate identified need through encouraging development at particular locations and working closely with town and parish councils, with the development of their neighbourhood development plans, to ensure that sites are identified at a local level which can provide for housing need having regard to this strategic policy. All groups are likely to benefit from this policy.
What do you already know about the relevance of the policy? What are the main issues you need to consider?
Government guidance in the form of the National Planning Policy Framework (NPPF) promotes the delivery of a wide choice of high quality homes. This section addresses a variety of considerations that must be incorporated into Local Plan policies including providing for a housing mix, market and affordable housing, reusing empty homes etc. The policies of the Local Plan have been drafted having regard to the NPPF.

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What data, research and other evidence or information is available which will be available to this EIA?
Coastal West Sussex Strategic Housing Market Assessment Strategic Housing Land Availability Assessment (SHLAA 2013)
What further data or information do you need to carry out the assessment?
None
Step 2 – assessing the impact of the policy
How does/will the policy and resulting activities affect different communities and groups?
Age
No issues identified
Disability
Providing for a significant number of homes throughout the district provides a greater range of housing units that can provide for the needs of the disabled throughout Arun.
Gender (male, female, transgender)
This policy would not have a differential impact on either gender.
Gender reassignment
No issues identified.
Race (this includes Travellers)
Evidence suggests that those from ethnic minorities are disadvantaged in the housing market and so would benefit from measures to improve housing provision. The issue of accommodation needs for Travellers is dealt with by a separate policy within the Local Plan.
Religion or belief
No issues identified.
Sexual orientation (Gay, Lesbian, bi-sexual – currently only applies to employment and Civil Partnerships)
No issues identified.
Pregnancy and Maternity
No issues identified.
Marriage and Civil Partnership
No issues identified.
Human Rights
No issues identified. The issue of accommodation needs for Travellers is dealt with by a separate policy within the Local Plan.
Additional comments/Other excluded communities and groups

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This policy relates to a statutory requirement. It also addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that there is clear justification for the inclusion of this policy. This is supported by the Local Development Framework evidence base and Government policy and guidance.

Step 1 – scoping the equality impact assessment (EIA)
Name of Policy
Affordable Housing
What are the main aims, purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?
The policy meets the Government requirement, as specified in the National Planning Policy Framework which states that planning authorities should provide for affordable housing.
List the main activities relating to the policy and identify who is likely to benefit from it.
The policy specifies the percentage of affordable housing that must be included on all housing schemes above a base level. Different percentage levels (lower) apply for smaller schemes.
This policy will benefit those on lower incomes, young people, those from ethnic minorities and people with disabilities. Without a supply of affordable housing many young people born in the district may have to move out of the area when seeking their own accommodation.
What do you already know about the relevance of the policy? What are the main issues you need to consider?
Although this policy may benefit some specific groups and possibly 'exclude' others the policy is considered essential to address the current levels of housing need in Arun, meet statutory requirements and to address wider long term needs. The policy will improve choice for otherwise disadvantaged groups and reduce the level of overcrowding where young people are not able to afford to leave their parents homes and start new households.
What data, research and other evidence or information is available which will be available to this EIA?
West Sussex Strategic Housing Market Assessment Housing Strategy: Raise the Roof 2010-2015 Housing Register (June 2013)
What further data or information do you need to carry out the assessment?
None.

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Step 2 – assessing the impact of the policy
How does/will the policy and resulting activities affect different communities and groups?
Age
No issues identified
Disability
People with disabilities tend to experience lower incomes with a greater proportion being on benefits. As a consequence this policy will have a positive impact on people with disabilities.
Gender (male, female, transgender)
This policy would not have a differential impact on either gender.
Gender reassignment
No issues identified.
Race (this includes Gypsies and Travellers)
Evidence suggests that those from ethnic minorities are disadvantaged in the housing market and so would benefit from measures to improve affordable housing provision.
Religion or belief
No issues identified.
Sexual orientation (Gay, Lesbian, bi-sexual – currently only applies to employment and Civil Partnerships)
No issues identified.
Pregnancy and Maternity
No issues identified.
Marriage and Civil Partnership
No issues identified.
Human Rights
No issues identified.
Additional comments/Other excluded communities and groups
This policy relates to a statutory requirement. It also addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that there is clear justification for the inclusion of this policy. This is supported by the Local Development Framework evidence base and Government policy and guidance.

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Step 1 – scoping the equality impact assessment (EIA)
Name of Policy
Independent Living and Care Homes
What are the main aims, purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?
Given the age profile of Arun district it is imperative that the policies in the Local Plan reflect the needs of all people in Arun, including the elderly and those in need of care homes.
List the main activities relating to the policy and identify who is likely to benefit from it.
This policy supports new and extended independent living and care homes in appropriate locations including being within the built up area boundary, easily accessible to community and social facilities.
The elderly are most likely to benefit from this policy.
What do you already know about the relevance of the policy? What are the main issues you need to consider?
A number of studies have already been undertaken which establish the need for Independent Living and Care Homes including the ONS Mid-Year Population estimates., West Sussex Public Health Plan (2012 – 2017) and the ‘Annual Report of the Director of Public Health and Wellbeing 2009/10’ : “A fair old age”. These documents, which have helped inform the policy that is now included in the Local Plan, point at the fact that Arun has an ageing population that is only set to increase in numbers, owing to better healthcare and subsequent longer living and also due to the fact that people are naturally drawn to settle in the Arun area because of the high quality of life that can be found here.
What data, research and other evidence or information is available which will be available to this EIA?
ONS Mid-Year Population estimates. West Sussex Joint Strategic Needs Assessments), West Sussex Public Health Plan (2012 – 2017) and the ‘Annual Report of the Director of Public Health and Wellbeing 2009/10’ A fair old age”
What further data or information do you need to carry out the assessment?
None
Step 2 – assessing the impact of the policy
How does/will the policy and resulting activities affect different communities and groups?
Age
No issues identified
Disability
Persons with disabilities could be accommodated in Independent Living and Care Homes which could improve their quality of life if such homes were not being supported throughout the district.

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Gender (male, female, transgender)
This policy would not have a differential impact on either gender.
Gender reassignment
No issues identified.
Race (this includes Travellers)
Evidence suggests that those from ethnic minorities are disadvantaged in the housing market and so would benefit from measures to improve housing provision. The issue of accommodation needs for Travellers is dealt with by a separate policy within the Local Plan.
Religion or belief
No issues identified.
Sexual orientation (Gay, Lesbian, bi-sexual – currently only applies to employment and Civil Partnerships)
No issues identified.
Pregnancy and Maternity
No issues identified.
Marriage and Civil Partnership
No issues identified.
Human Rights
No issues identified.
Additional comments/Other excluded communities and groups
This policy relates to a statutory requirement. It also addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that there is clear justification for the inclusion of this policy. This is supported by the Local Development Framework evidence base and Government policy and guidance.

Step 1 – scoping the equality impact assessment (EIA)
Name of Policy
Traveller Accommodation
What are the main aims, purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?
The policy is to address a shortfall in accommodation for travellers. Improving supply should also reduce the number of unauthorised encampments and make enforcement action, where appropriate, more effective.

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List the main activities relating to the policy and identify who is likely to benefit from it.
The Gypsy, Traveller and Travelling Showpeople Sites Study (2013) provides an evidence base prepared jointly by the coastal West Sussex Authorities, the South Downs National Park Authority and West Sussex County Council. Further work is required to complete the jointly commissioned GTAA as well as undertake further local evidence gathering as part of a site assessment exercise. The Arun Local Development Scheme includes a commitment to prepare a the Gypsy and Traveller Sites Allocation Development Plan Document (DPD) A policy based criteria for Traveller accommodation has been included in the Local Plan.
What do you already know about the relevance of the policy? What are the main issues you need to consider?
Issues relating to Traveller Accommodation are very controversial and raise many concerns among local residents. However, at the same time local authorities have a responsibility to address the accommodation needs of these groups. Consequently the policy seeks to establish a fair system to approach this issue by establishing clear criteria which seeks to identify the most appropriate locations to accommodate Traveller Accommodation.
What data, research and other evidence or information is available which will be available to this EIA?
Designing Gypsy and Traveller Sites Good Practice Guide (DCLG 2008) West Sussex Travelling Showpeople Study Final Report 2008 (DCA) Gypsy, Traveller and Travelling Showpeople Sites Study (Baker Associates on behalf of ADC (2008) Planning policy for traveller sites (March 2012)
What further data or information do you need to carry out the assessment?
None.
Step 2 – assessing the impact of the policy
How does/will the policy and resulting activities affect different communities and groups?
Age
No issues identified
Disability
No issues identified.
Gender (male, female, transgender)
This policy would not have a differential impact on either gender.
Gender reassignment
No issues identified.
Race (this includes Travellers)

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Travellers are a recognised ethnic group and this policy is aimed at addressing their specific accommodation needs.
Religion or belief
No issues identified.
Sexual orientation (Gay, Lesbian, bi-sexual – currently only applies to employment and Civil Partnerships)
No issues identified.
Pregnancy and Maternity
No issues identified.
Marriage and Civil Partnership
No issues identified.
Human Rights
Travellers belong to an identifiable ethnic group whose traditional ways of life are protected by the Human Rights Act. This has to be balanced with the needs of the wider community. The policy seeks to meet the needs of the group whilst balancing this with wider community needs.
Additional comments/Other excluded communities and groups
This policy relates to a statutory requirement. It also addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that there is clear justification for the inclusion of this policy. This is supported by the Local Development Framework evidence base and Government policy and guidance.

Step 1 – scoping the equality impact assessment (EIA)
Name of Policy
Housing Mix
What are the main aims, purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?
Housing provision is a vital part of developing sustainable communities – if people cannot find homes that meet their needs and that they can afford they may have to live in inappropriate circumstances or leave the district. Housing therefore underpins objectives of the Local Plan such as tackling deprivation, meeting social and community needs, and the overarching aim of building sustainable communities by ensuring that planning is inclusive, taking into account the needs of all members of society.
List the main activities relating to the policy and identify who is likely to benefit from it.
Development of housing that responds to identified housing needs and demands in the district.

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<p>Provision of a range of market housing.</p> <p>All groups are likely to benefit from this policy.</p>
<p>What do you already know about the relevance of the policy? What are the main issues you need to consider?</p>
<p>Government guidance in the form of the National Planning Policy Framework (par. 50) states that Local Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.</p>
<p>What data, research and other evidence or information is available which will be available to this EIA?</p>
<p>Coastal West Sussex Strategic Housing Market Assessment – emerging document</p>
<p>What further data or information do you need to carry out the assessment?</p>
<p>None</p>
<p>Step 2 – assessing the impact of the policy</p>
<p>How does/will the policy and resulting activities affect different communities and groups?</p>
<p>Age</p>
<p>No issues identified</p>
<p>Disability</p>
<p>A provision of housing mix can also help to accommodate people with disabilities which will help to improve quality of life.</p>
<p>Gender (male, female, transgender)</p>
<p>This policy would not have a differential impact on either gender.</p>
<p>Gender reassignment</p>
<p>No issues identified.</p>
<p>Race (this includes Gypsies and Travellers)</p>
<p>Evidence suggests that those from ethnic minorities are disadvantaged in the housing market and so would benefit from measures to improve housing provision.</p> <p>The issue of accommodation needs for Gypsies, Travellers and Travelling Showpeople is dealt with by a separate policy within the Core Strategy.</p>
<p>Religion or belief</p>
<p>No issues identified.</p>
<p>Sexual orientation (Gay, Lesbian, bi-sexual – currently only applies to employment and Civil Partnerships)</p>
<p>No issues identified.</p>

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Pregnancy and Maternity
No issues identified.
Marriage and Civil Partnership
No issues identified.
No issues identified. The issue of accommodation needs for Gypsies, Travellers and Travelling Showpeople is dealt with by a separate policy within the Core Strategy.
Additional comments/Other excluded communities and groups
This policy relates to a statutory requirement. It also addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that there is clear justification for the inclusion of this policy. This is supported by the Local Development Framework evidence base and Government policy and guidance.

CONCLUSIONS

- 4.3 The policies of the Local Plan were subjected to an initial screening process and Table 1 in section 3 identifies that there is potential for five policies to have a direct positive impact on certain groups to the extent that they have the potential to 'exclude' other groups.
- 4.4 These three policies were:
- Strategic Housing, Parish and Town Council Allocations
 - Affordable Housing
 - Independent Living and Care Homes
 - Traveller Accommodation
 - Housing Mix
- 4.5 Each of the five policies above was assessed using the Arun District Council Equalities Impact Assessment – Part 2 template. The detail of this is set out in Section 4 of this report and the conclusion is summarised below.

Policy – Strategic Housing, Parish and Town Council Allocations

- 4.6 This policy will significantly contribute to developing sustainable communities. The policy has been informed by a range of sources including the Housing Register, the Strategic Housing Land Availability Assessment and the Strategic Market Housing Assessment. The aim of the policy is to accommodate identified need through the promotion of development at particular locations while working closely with town and parish councils, with the development of their neighbourhood development plans.
- 4.7 This policy relates to a statutory requirement. It also addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that there is clear justification for the inclusion of this policy. This is supported by the Local Development Framework evidence base and Government policy and guidance.

Policy – Affordable Housing

- 4.8 This policy also reflects a statutory requirement, as specified in par. 47 of the National Planning Policy Framework that Local Development Frameworks should provide for affordable housing and that this should be based on an assessment of housing need and viability. The policy specifies the percentage of affordable housing that must be included on all housing schemes above a base level. Different percentage levels (lower) apply for smaller schemes.
- 4.9 This policy will benefit those on lower incomes, young people, those from ethnic minorities and people with disabilities. Without a supply of affordable housing many young people born in the district may have to move out of the area when seeking their own accommodation. It addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that

there is clear justification for the inclusion of this policy. This is supported by the Local Development Framework evidence base and Government policy and guidance.

Policy – Independent Living and Care Homes

- 4.10 Given the age profile of the Arun district, it is important that the policies in the Local Plan provide for suitable accommodation to satisfy the needs of the ageing population but also for those who could benefit from independent living and care homes. Future projections indicate that Arun's population is set to increase owing to better healthcare and subsequent longer living and also due to the fact that people are naturally drawn to settle in the Arun area because of the high quality of life that can be found here.
- 4.11 This policy relates to a statutory requirement. It also addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that there is clear justification for the inclusion of this policy. This is supported by the Local Development Framework evidence base and Government policy and guidance.

Policy – Traveller Accommodation

- 4.12 This policy aims to address a shortfall in accommodation for Travellers and reflects a statutory requirement. Improving supply should also reduce the number of unauthorised encampments and make enforcement action, where appropriate, more effective.
- 4.13 Travellers belong to an identifiable ethnic group whose traditional ways of life are protected by the Human Rights Act. This has to be balanced with the needs of the wider community. The policy seeks to meet the needs of the group whilst balancing this with wider community needs. It addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that there is clear justification for the inclusion of this policy. This is supported by the Local Development Framework evidence base and Government policy and guidance.

Policy – Housing Mix

- 4.14 Identifying the appropriate housing mix for the district is a vital part of developing sustainable communities. If people cannot find homes that meet their needs and that they can afford they may have to live in inappropriate circumstances or leave the district. Housing therefore underpins objectives of the Local Plan such as tackling deprivation, meeting social and community needs, and the overarching aim of building sustainable communities by ensuring that planning is inclusive, taking into account the needs of all members of society.
- 4.15 The policy relates to a statutory requirement. It also addresses specific needs in a practical and appropriate manner and has wider community benefits. It is the conclusion of this assessment that there is clear justification for the inclusion of this policy. This is supported by the Local

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Development Framework evidence base and Government policy and guidance.

Overall Conclusion

- 4.16 The five policies discussed above address a statutory requirement and are based on a sound evidence base. They all attempt to address an existing imbalance and seek to ensure equality of opportunity and promote social inclusion. It is considered that in light of the above there is clear justification for the inclusion of these policies.

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**Background Paper 6: Section 17 of the Crime & Disorder
Act as amended by the Police & Justice Act (2006)
Assessment of the Arun Local Plan (2011-2031)
Publication Version**

ARUN DISTRICT COUNCIL LOCAL DEVELOPMENT FRAMEWORK

ARUN LOCAL PLAN

SECTION 17 ASSESSMENT: September 2014

The Arun Local Plan covers the whole of Arun District except the area covered by the South Downs National Park Authority (SDNPA) which is the statutory planning authority for the National Park area.

The Local Plan must now be prepared in accordance with the National Planning Policy Framework (NPPF), which was published in March 2012. The NPPF must also be read alongside Planning Policy for Traveller Sites which was also published in March 2012 and the Planning Practice Guidance, published in March 2014.

Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; (NPPF, paragraph 58)*

Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act 1998, as amended by the Police and Justice Act (2006), requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation

Crime should not be seen as a stand-alone issue, to be addressed separately from other design considerations. That is why guidance on crime has been embedded throughout the guidance on design rather than being set out in isolation.

It is important that crime reduction-based planning measures are based upon a clear understanding of the local situation, avoiding making assumptions about the problems and their causes. Consideration also needs to be given to how planning policies relate to wider policies on crime reduction, crime prevention and sustainable communities.

A Section 17 Assessment has been undertaken, in consultation with the Safer Arun Partnership, as part of the preparation of the Local Plan preparation process to ensure that it meets the requirement of the 2006 Act.

Safer Arun Partnership

The Crime & Disorder Act 1998 provided the framework for the establishment of statutory Community Safety Partnerships (CSPs). It gave the lead responsibility for crime and disorder reduction to the police and local authorities, as well as a duty to consider crime and disorder in all their activities. This duty is what is referred to as 'Section 17'. In 2004 the Fire Service and PCT also became responsible authorities with the addition of Probation Trusts in April 2010. All of the responsible authorities are members of the Safer Arun Partnership (SAP), the CSP for Arun District, along with representatives from other local public and voluntary organisations.

According to Home Office guidance Section 17 of the Crime & Disorder Act 1998 means that each local authority should take account of the community safety dimension in all its work, and to do all that it can within its core business to prevent crime and disorder. All policies, strategies, plans and budgets will need to be considered from the standpoint of their potential contribution to the reduction of crime and disorder.

Details about the Safer Arun Partnership's (SAP) plans and programmes can be found at: www.saferarun.co.uk

SAP was consulted on the Draft Local Plan (2013 – 2028) in October 2012. Its response has been taken account of in developing the Local Plan and this Section 17 Assessment.

The Community Safety Manager, for the Safer Arun Partnership, was consulted on the Local Plan and this Section 17 Assessment in June 2014 to confirm that its policies and proposals had taken account of the previous response and any new issues.

The Community Safety Manager confirmed that this Section 17 Assessment "is a comprehensive and accurate assessment with no major content or amendments required to the version that both Arun DC and the Safer Arun Partnership considered and endorsed in September 2012".

The Partnership formally confirmed its agreement on 1st September 2014.

The table below sets out the outcomes as a "Section 17 Assessment"

Table 1

ARUN DISTRICT COUNCIL LOCAL DEVELOPMENT FRAMEWORK

ARUN LOCAL PLAN

SECTION 17 ASSESSMENT: September 2014

Local Plan Policy Description	Potential Effect identified by the Safer Arun Partnership	Considerations suggested by the Safer Arun Partnership	ADC: Local Plan Response
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Item	Sustainable Place: Sustainable Development, Settlement Structure & Green Infrastructure			
1	<p>These policies promote sustainable development in Arun District. The Policies define the built area where development will normally be permitted, safeguarding the countryside for its own sake, the protection and enhancement of the area's Green Infrastructure. These policies set out the spatial framework in which development will be delivered.</p>	<p>The strategic direction provided by these policies aims to improve social, economic and environmental conditions. Policy SD SP1 has a focus on increasing employment density in the District that can help to reduce the drivers of crime/anti-social behaviour. These aims are dealt with in more detail in the individual chapters.</p> <p>Increases in business activity, household and population could put increased pressure on the existing provision of emergency services.</p>	<p>Increase police numbers in line with population increase and identify opportunities to develop a group which focuses upon early intervention for crime and disorder.</p>	<p>The growth and regeneration outcomes from the implementation of the Local Plan should help to determine how policing budgets could be used in the district in the future.</p> <p>Focus upon strategic housing and employment sites at Bognor Regis, Littlehampton, Angmering, Barnham-Eastergate-Westergate.</p> <p>Consultation response from the Safer Arun Partnership (SAP) identifies the opportunity to invest in new facilities that can help meet its aims. This can be dealt with through appropriate planning obligations/charges (Section 106/CIL).</p> <p>The regular review of the Infrastructure Delivery Plan and CIL can help to identify local and strategic investment</p>

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SECTION 17 ASSESSMENT: September 2014

Local Plan Policy Description	Potential Effect identified by the Safer Arun Partnership	Considerations suggested by the Safer Arun Partnership	ADC: Local Plan Response
		To maintain or reduce levels of anti-social behaviour ADC should consider the mainstreaming of the Anti-Social Behaviour Team with a focus on early intervention to provide proven and cost effective diversionary activities.	opportunities/requirements. The "Secure by Design"/ CPTED issues are now dealt with in Design: D DM1 Arun DC funding the Anti-Social Behaviour Team to March 2016

Table 1

ARUN DISTRICT COUNCIL LOCAL DEVELOPMENT FRAMEWORK

ARUN LOCAL PLAN

SECTION 17 ASSESSMENT: September 2014

Local Plan Policy Description	Potential Effect identified by the Safer Arun Partnership	Considerations suggested by the Safer Arun Partnership	ADC: Local Plan Response
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Item	Employment Land Provision			
	Prosperous Place: Employment Land Provision, Retail, Tourism, Soils, horticultural and equine developments.			
2	These policies relate to the encouragement of economic and business growth in the District. The policies deal with commercial/ industrial development, retail, tourism and the rural economy.	Business growth within the district could provide more acquisitive crime opportunities.	Need to support the development of an active Business Crime Reduction Partnership (BCRP). The policies could also require that sites are designed to comply with Crime Prevention Through Environmental Design (CPTED) principles.	Supporting text to Policy EMP DM1 of the Local Plan identifies the requirement for development to help "reduce crime". This provides the opportunity to encourage Business Crime Reduction Partnerships (BCRPs) at new and existing employment sites. The CPTED issue is now dealt with in Design: D DM1
3	Existing employment sites and premises will be protected where there remains a good prospect of employment use. Change of use from Business class (B1-B8) or similar sui generis uses will not be permitted other than certain identified exceptions.	Before any change of use is considered, ADC will require that sites are marketed to explore the potential reuse of the current premises or redevelopment for alternative business uses. Potential effect needs to be assessed on a case by case basis depending on location in relation to the proximity of residential areas and local crime levels.	Section 17 considerations should be given to any potential change of use through consultation with Safer Arun Partnership (SAP) partners. However, consideration should also be given to the effect on an area if it remains unused for a long time and becomes derelict, potentially attracting Anti-Social Behaviour (ASB). Need to comply with CPTED principles	A new process has been implemented whereby the Safer Arun Partnership is consulted on relevant planning applications. Policy EMP DM1 of the Local Plan states that change of uses will not be permitted unless: "The existing location poses insurmountable environmental harm or amenity which cannot be satisfactorily resolved." This wording is considered

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ARUN LOCAL PLAN

SECTION 17 ASSESSMENT: September 2014

Local Plan Policy Description	Potential Effect identified by the Safer Arun Partnership	Considerations suggested by the Safer Arun Partnership	ADC: Local Plan Response
			to be sufficiently flexible to address the likely impact of derelict buildings. The CPTED issue is now dealt with in Design: D DM1
4	Strategic Employment Sites have been identified in Bognor Regis, Littlehampton and Angmering.	Potential effect needs to be assessed on a case by case basis depending on location in relation to the proximity of residential areas and local crime levels.	Need to comply with CPTED principles A new process has been implemented whereby the Safer Arun Partnership is consulted on relevant planning applications. The CPTED issue is now dealt with in Design: D DM1
5	The Council will work with partners and developers to enhance the knowledge and skills and local employment opportunities for local residents including the promotion of local labour and training agreements on major construction projects.	Lack of vocational skills and unemployment is an important driver for crime and this is seen as a key objective within the Economic Strategy.	SAP would encourage any initiative which would reduce the numbers of those Not in Employment Education or Training (NEET) in the District. Comment noted: Policies SP SKILLS 1 and EMP DM4 of the Local Plan are supported.
	Retail		
6	Protecting and promoting the District's town centres as the focus for retail, office and leisure development.	The regeneration of the town centres can have either a positive or negative effect on crime and disorder dependant on the type and design of the developments introduced.	It is suggested consideration should be given to the following points: <ul style="list-style-type: none"> • Maintaining an active and vibrant town centre to reduce the number of empty premises. • Encouraging a more mixed night time economy to bring a wider spread of age groups into the town Policy RET SP1 of the Draft Local Plan is sufficiently flexible to allow a range of town centre uses to meet community needs. Policy RET DM1 of the Local Plan addresses reuse of redundant floorspace Environmental Health Department consult

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		<p>in the evenings.</p> <ul style="list-style-type: none"> • A continual review and robust management is maintained with licensing regulations with careful consideration given to permitted opening hours based on community needs. • If town centres are successful in becoming social venues attracting more people from outside the district extra police resource will be required. • • Adhering to Crime Prevention through Environmental Design (CPTED) principles in the design and layout of any new or redesigned developments. • Maintain the financial commitment for police monitored CCTV cameras for crime prevention and to support the conviction of offenders. 	<p>planning on licensing regulations. Opening hours are considered on a case by case basis.</p> <p>A new process has been implemented whereby the Safer Arun Partnership is consulted on relevant planning applications.</p> <p>Planning policy cannot provide the funding for extra police resources.</p> <p>The CPTED issue is now dealt with in Design: D DM1</p> <p>Policy D DM1 deals with the matter of "security". Consultation responses from the SAP that identifies the opportunity to require that all major applications contribute to the provision of town centre CCTV</p>

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ARUN DISTRICT COUNCIL LOCAL DEVELOPMENT FRAMEWORK

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SECTION 17 ASSESSMENT: September 2014

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				cameras, can be dealt with through appropriate planning obligations/charges (Section 106/CIL).
7	Retail development within primary or designated shopping frontages.	Designating shopping frontages for use as late night convenience stores or fast food outlets can potentially have a detrimental effect on an area by acting as a gathering point resulting in ASB impacting on the surrounding area.	Any applications for change of use needs to be considered on a case by case basis in consultation with SAP partners. Careful management of location and distribution of vulnerable premises is required to avoid creating trouble spots.	Policy RET SP1 of the Local Plan is sufficiently flexible to allow a range of town centre uses to support economic growth and meet community needs. Policy RET DM1 aims to secure the retail character of shopping frontages and manage the potential for concentration of non-retail uses.
	Tourism			
8	All tourism development proposals will be expected to demonstrate they are in accessible locations with realistic travel plans. Large scale developments will generally be directed toward the Bognor Regis and Littlehampton Economic Growth Areas.	Significant increases in visitors to the area has the potential to generate more crime, both through bringing those who could perpetrate crime into the area as well as providing higher numbers of potential victims for those locally to target. Tourism is an area that can attract migrant workers into jobs such as catering, waiting	To mitigate any potential negative impact on crime and disorder of significant tourist developments it is suggested that developers must be able to demonstrate how they will satisfy the employment requirements, how they intend to sustain employment, identify any provision for housing if drawing employees from outside the district and any	Policy TOU DM1 aims to address this issue: "All proposals for development, including expansion, which are likely to attract visitors (such as leisure or cultural facilities) will demonstrate that they are in accessible locations and will be accompanied by workable and realistic travel plans, address visitor

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	tables, cleaners etc.	<p>seasonal effects on employment.</p> <p>The Safer Arun Partnership is consulted on significant tourist related developments with adherence to CPTED principles.</p>	<p>management issues and achieve good design. Larger scale proposals will generally be directed towards the Economic Growth Areas of Littlehampton and Bognor Regis. Lower scale development, scalable according to relative impact, may be suitable in other areas of the District including Arundel, subject to other policies in the Local Plan.”</p> <p>A new process has been implemented whereby the Safer Arun Partnership is consulted on relevant planning applications.</p> <p>The CPTED issue is now dealt with in Design: D DM1</p>
Soils, Horticulture & Equine developments			
9	<p>New horticultural developments will be permitted dependent on certain conditions.</p> <p>New building for temporary accommodation for seasonal horticultural workers will only be permitted where it can be demonstrated it is essential for the</p>	Growth and development in horticulture has the potential to attract larger numbers of migrant workers to the area with the associated	<p>Employers should be asked to demonstrate how they intend to satisfy their employment needs, identify any housing need provision, show how they</p> <p>Supporting text to HOR DM1 refers to the Housing Delivery part of the Local Plan.</p> <p>Policy H DM3 deals with</p>

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Local Plan Policy Description	Potential Effect identified by the Safer Arun Partnership	Considerations suggested by the Safer Arun Partnership	ADC: Local Plan Response	
	function of the associated enterprise.	challenges this creates. However, increased opportunities within this sector can also help to reduce the unemployment and homelessness within this community. However this is often seasonal which means that unemployment levels may rise in the district out of season.	will sustain employment and provide any support for the health and wellbeing needs of their staff. They should also demonstrate how they will cater for any seasonal changes in employment requirements. There is a minority in the migrant communities linked to organised crime with drug and alcohol problems and issues of human trafficking and exploitation. The effect of large horticultural developments in Chichester District also needs to be considered as many that work there choose to live in Arun.	agriculture, forestry and horticultural workers dwellings. Policy H SP4 deals with HMO's. It should be noted that planning permission for HMO's is only required where seven or more people occupy a single dwelling. A new process has been implemented whereby the Safer Arun Partnership is consulted on relevant planning applications.
10	New building for temporary accommodation for seasonal horticultural workers will only be permitted where it can be demonstrated it is essential for the function of the associated enterprise. Otherwise workers are expected to be housed in existing accommodation in surrounding towns and villages.	Seasonal influxes of migrant workers into rural communities have the potential to disrupt the existing demographic balance and create perceived concerns due to cultural differences.	Partner agencies will need to consider resources for myth-busting activities within affected communities. It is important for good regulation of gang masters to be maintained with regular visits and transparency with business owners.	Policies H SP4, H DM3 and D DM1 will aim to deal with the planning matters. A new process has been implemented whereby the Safer Arun Partnership is consulted on relevant planning applications which can provide an early indication of potential issues for partners to manage any risks.

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Living Place: Housing Delivery, Design, Health, Recreation & Leisure				
11	These policies focus on the delivery of housing by number and location, aiming for excellent design in development and enhancement of wellbeing through positive health, recreation and leisure outcomes.			
Housing Delivery				
12	<p>Strategic housing development shall be accommodated as follows:</p> <ul style="list-style-type: none"> (i) Through sustainable urban extensions in Littlehampton and Bognor Regis on sites with planning permission to include at North Bersted (Site 6), Courtwick & North Littlehampton, (ii) A site specific allocation within Barnham, Eastergate and Westergate areas: at least 2000 homes, (iii) A site specific allocation in Angmering: at least 600 homes. (iv) Littlehampton Economic Growth Areas, including West Bank (Area Action Plan), (v) Ford and Fontwell, subject to the preparation and adoption of site specific development documents (vi) Parish and Town Council Allocations through Neighbourhood Plans 	Increases in household units and population could put increased pressure on existing provision of emergency services.	<p>Increase police numbers in line with population increase and identify opportunities to develop a group which focuses upon early intervention for crime and disorder.</p> <p>To maintain or reduce levels of anti-social behaviour ADC should consider the mainstreaming of the Anti-Social Behaviour Team with a focus on early intervention to provide proven and cost effective diversionary activities.</p> <p>Developers of new housing should be expected to conform to Secure By Design standards.</p>	<p>The projected population increase as set out in Policy H SP1 of the Local Plan should help to determine how policing budgets could be used in the district in the future.</p> <p>Consultation response from the SAP that identifies the opportunity to invest in new facilities that can help meet its aims can be dealt with through appropriate planning obligations/charges (Section 106/CIL).</p> <p>The regular review of the Infrastructure Delivery Plan and CIL can help to identify local and strategic investment opportunities/requirements.</p> <p>The "Secure by Design"/ CPTED issues are now dealt with in Design: D DM1</p>

Table 1

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Local Plan Policy Description	Potential Effect identified by the Safer Arun Partnership	Considerations suggested by the Safer Arun Partnership	ADC: Local Plan Response	
<p>13</p>	<p>The council will support development proposals that provide an appropriate mix of housing types and sizes in all new development in order to create inclusive and sustainable communities. As detailed in Policy H DM1</p> <p>For all developments of 15+ residential units the Council will seek 30% affordable housing to be provided on-site as part of the development unless for agreed viability reasons this is not possible.</p> <p>For all developments of 1-14 residential units the Council will seek 15% affordable housing to be provided through a number of identified options.</p>	<p>A good mix of housing types and sizes can create a basis for a well balanced community. However, the impact of layout and design of residential development must also be taken into consideration.</p> <p>The Strategic Housing Market Assessment (SHMA) will inform housing mix.</p>	<p>Residential developments must be designed to ensure cohesive and sustainable places and provide an appropriate mix of community facilities.</p> <p>Good involvement with Registered Social Landlords (RSLs) involved with the new developments will be required with consultation with SAP to avoid problematic families being placed in vulnerable neighbourhoods.</p>	<p>The supporting text to Policy H DM1 refers to the requirement to adhere to regularity and design guidance.</p> <p>The "Secure by Design"/ CPTED issues are now dealt with in Design: D DM1</p> <p>Policy OSR DM1 of the Local Plan promotes the protection and creation of open space, indoor and outdoor and cultural facilities.</p> <p>The council has a Housing Allocations Scheme. The council works with registered partners to ensure the objectives of the Housing Allocations Scheme are met.</p>
<p>14</p>	<p>The Council will take into account criteria to guide future provision of traveller sites and determination of planning applications.</p>	<p>It is important that the criteria ensures that the location and design of gypsy and traveller sites are well related to schools, health care facilities, provide proper consideration of the effect on the local environment and promote integrated co-existence between sites and the local</p>	<p>Notice should be taken to the guidance in the DCLG publication 'Designing Gypsy and Traveller Sites Good Practice Guide'.</p> <p>Where sites are situated near to existing residential areas consideration should be given to the resource required to deal with the potential impact,</p>	<p>DCLG publications have been taken into account in Policy H SP5. That is: Planning Policy for Traveller Sites' (2012) and 'Designing Gypsy and Traveller Sites Good Practice Guide' (2008).</p> <p>The Councils' Local Development Scheme</p>

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	community.	community tensions and myth-busting activities.	(LDS) includes a commitment to produce a Gypsy, Traveller and Travelling Showpeople Sites Development Plan Document.	
	Design			
15	<p>Proposals will have to demonstrate a high standard of sustainable design.</p> <p>Crime prevention section refers to seven key principles from 'Safer Place – The Planning System & Crime Prevention:</p> <ul style="list-style-type: none"> • Access and movement • Structure • Surveillance • Ownership • Physical protection • Activity • Management and maintenance 	<p>Good planning and adherence to defined principles plays an important and positive role that can help to create attractive, well-managed environments which help to discourage anti-social and criminal behaviour. It also aims to ensure that new development can be located and designed in a way that deters such behaviour.</p> <p>Poorly designed surroundings can create feelings of hostility, anonymity and alienation and can have significant social, economic and environmental costs.</p>	<p>All new developments and significant regeneration plans should conform to the guidance as advised in Planning Practice Guidance: Section 8 - promoting healthy communities and Section 9 – Also to conform to the design principles laid out in the document New Homes 2010 issued by ACPO: Secured by Design.</p>	<p>Planning Policy Guidance (PPG) (2014) has been taken account of in Policy D SP1 of the Local Plan (PPG reference: Paragraph: 006Reference ID: 26-006-20140306). Design: Safer Places – The Planning System and Crime Prevention (ODPM, 2004) was used to prepare Policy DM14 of the Draft Local Plan.</p> <p>The "Secure by Design"/ CPTED issues are now dealt with in Design: D DM1 of the Local Plan.</p>

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SECTION 17 ASSESSMENT: September 2014

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Health, Recreation and Leisure				
16	<p>Provision of open space and play areas within new housing developments.</p> <p>Residential development will be required to provide 2.4 hectares of outdoor playing space per 1,000 population.</p> <p>Planning applications for new sports, cultural, leisure and recreational facilities or improvements and extensions to existing facilities will be permitted provided they meet identified criteria.</p>	<p>The provision of play space within new developments is an important and integral addition to provide suitable places, for young people in particular, to gather socially and enhance the quality of life of all residents.</p> <p>However, if badly designed and sited they can also act as hotspots for anti-social behaviour and disturbance, and become unsafe as areas in which younger children can play.</p>	<p>All play areas should be designed and located to conform to the advice set out in the Secured by Design advice guidance document and should be located far enough away from residential properties so as not to cause undue noise nuisance while ensuring good natural surveillance opportunities.</p> <p>Young people should be consulted to match equipment provision to their wants and needs.</p>	<p>Design guidelines for open space provision are set out within a Technical Appendix to the Local Plan which accompanies Policy OSR DM1 of the Local Plan.</p> <p>Reference is be made to the Secured by Design advice guidance document within Policy OSR DM1 of the Local Plan.</p> <p>It will be the responsibility of the appropriate department at Arun District Council to consult local groups, once the funding for open space and recreation provision is in place.</p>
17	<p>The Council will encourage the development of allotment sites subject to identified criteria.</p>	<p>Allotment sites are sometimes targeted with regard to non-domestic burglary and criminal damage.</p>	<p>Any new allotment sites should be developed with secure boundaries and in suitable locations to maximise natural surveillance.</p>	<p>Design guidelines for open space provision, including allotments, is set out within a Technical Appendix to the Local Plan which accompanies Policy OSR DM1 of the Local Plan.</p>

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Local Plan Policy Description	Potential Effect identified by the Safer Arun Partnership	Considerations suggested by the Safer Arun Partnership	ADC: Local Plan Response
Connected Place: Transport, Sustainable Travel & Public Rights of Way, Safeguarding of the main road network, Parking			
18	These policies deal with the transport management, promotion of sustainable transport, identifying major road routes for improvement and safeguarding, and parking standards		
19	All major development in Arun will support the aims of the West Sussex Local Transport Plan 2011-2026 in order to achieve an efficient, multi-modal transport network through planning contributions and the Community Infrastructure Levy.	While good road links are seen as crucial to the development of the District's business and visitor economies, certain crime types, particularly acquisitive crimes, are linked to corridors along major road links.	It may be advantageous for the police to add to the existing Automatic Number Plate Recognition network where significant road links have been added, for example the north Bognor Regis relief road.
	Parking policies	If badly designed, communal car parking areas in residential developments can become gathering places and focal points for anti-social behaviour with incidents of vehicle crime.	Policies D SP1, D DM1 and DDM3 of the Local Plan address safety and require that parking provision is consistent with current national guidance and all Local Plan policies. This wording is sufficiently flexible to ensure that the latest guidance referring to secure design is considered by developers. Traffic calming measures can be considered by the County Council as the

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		<p>environments. The use of traffic calming measures must be carefully considered.</p> <p>Public car parks should seek to gain the Safer Parking Award.</p> <p>Any provision of cycle parking at railway stations should also meet CPTED standards as cycle thefts from railway stations can be problematic.</p>	<p>Highway Authority.</p> <p>27 Car Parks in Arun District are within the approved Safer Parking Scheme.</p> <p>Policy DM2: Public Car of the Local Plan includes reference to security and design with regard to cycle parking.</p>

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Local Plan Policy Description	Potential Effect identified by the Safer Arun Partnership	Considerations suggested by the Safer Arun Partnership	ADC: Local Plan Response
Protected Place: Building Conservation & Archaeological Heritage, Natural Environment, Water, Natural Resources and Minerals Safeguarding, Waste Management, Quality of the Environment.			
Natural Environment			
20	These policies aim to protect and manage heritage assets, the natural environment and environmental quality of the District. This chapter also includes policies to manage, improve and make the most efficient use of natural resources, water, safeguard minerals and waste management.		
21	It is the policy of the Council to maintain, protect and where possible enhance the conservation value of Designated Nature Sites as listed.	Designated nature sites can attract anti-social behaviour due to their isolated position. This can result in incidents of litter and damage.	Protect and enhance designated nature sites Policies ENV DM1, ENV DM2 and ENV DM3 of the Local Plan aim to maintain protect and where possible enhance conservation value of these sites. Where development or increased presence of wardens is required to protect these sites, the policy is flexible enough to allow this where resources allow. Where development is permitted, the "Secure by Design"/CPTED issues are now dealt with in Design: D DM1 of the Local Plan.

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Deliverable Place : Infrastructure Provision & Implementation, The Community Infrastructure Levy, Monitoring				
22	This chapter sets out the approach to secure the infrastructure necessary to deliver development across the district, including the Community Infrastructure Levy. It should be read in conjunction with the detail provided in the Infrastructure deliverable plan (IDP).			
	<p>The Council will seek to ensure that infrastructure services and community facilities made necessary by development are available or will be provided at the appropriate time.</p>	<p>There is evidence that deprivation and inequalities are a significant contributory factor as a causal driver of crime.</p> <p>Any reduction in community facilities in relation to a growing population could lead to increases in crime.</p>	<p>The provision of services and community facilities must be timed to meet the needs of new communities prior to their completion.</p> <p>Facilities also need to be accessible and inclusive allow use by all sectors of the community. Youth facility provision is important.</p>	<p>The infrastructure delivery plan for the Local Plan identifies community infrastructure requirements. To ensure that community infrastructure is accessible and inclusive and that appropriate provision for youth and community facilities is provided.</p> <p>Consultation response from the SAP that identifies the opportunity to invest in new facilities that can help meet its aims can be dealt with through appropriate planning obligations/charges (Section 106/CIL).</p> <p>The regular review of the Infrastructure Delivery Plan and CIL can help to identify local and strategic investment opportunities/requirements.</p>

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GLOSSARY OF TERMS

ACPO	Association of Chief Police Officers	NEET	Not in Employment Education or Training
ADC	Arun District Council		
ASB	Anti-Social Behaviour	PPS	Planning Policy Statement
BCRP	Business Crime Reduction Partnership	RSL	Registered Social Landlord
CCTV	Closed Circuit Television	SAP	Safer Arun Partnership
CPTED	Crime Prevention Through Environmental Design	SHMA	Strategic Housing Market Assessment
DCLG	Department of Communities and Local Government	WSCC	West Sussex County Council
ANPR	Automatic Number Plate Recognition		
HMO	House of Multiple Occupation		

Background Paper 8: Duty to Cooperate Correspondence

Duty to Cooperate

Memorandum of Understanding

Parties to the Agreement

The Agreement involves the following local planning authorities:

- Arun District Council
- Mid Sussex District Council

Introduction

Local planning authorities are required by the Localism Act 2011 to meet the ‘Duty to Cooperate’, that is to engage constructively and actively on an ongoing basis on planning matters that impact on more than one local planning area. Section 33A(6) of the Planning and Compulsory Purchase Act 2004 also requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. Local planning authorities are also required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.

The Duty to Cooperate is amplified in the National Planning Policy Framework (NPPF) which sets out the key strategic priorities that should be addressed jointly (paragraph 156). Paragraphs 178-181 of the NPPF detail how it is expected that the Duty to Cooperate will function, and in particular state that:

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position.”

The National Planning Practice Guidance (NPPG) offers further advice on the implementation of the Duty to Cooperate. This includes the advice that one way to demonstrate effective cooperation, particularly if Local Plans are not being brought forward at the same time, is the use of formal agreements between local planning authorities, signed by elected members, demonstrating their long term commitment to a jointly agreed strategy on cross-boundary matters. The NPPG states that:

“Such agreements should be as specific as possible, for example about the quantity, location and timing of unmet housing need that one authority is prepared to accept from another authority to help it deliver its planning strategy. This will be important to demonstrate the commitment between local planning authorities to produce effective strategic planning policies, and it will be helpful for Inspectors to see such agreements at the examination as part of the evidence to demonstrate compliance with the duty.”

Objectives

This Memorandum of Understanding relates to the preparation of local development plans in the two local planning authority areas – Arun District Council and Mid Sussex District Council. Its overall aim is to ensure appropriate planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the two authorities.

Current Position

The current position is as follows:

Mid Sussex is preparing a revised version of its District Plan for the period 2014 – 2031. It is anticipated that there will be public consultation on this draft Plan from November 2014 until January 2015, that it will be published in May 2015 and submitted to the Secretary of State in July 2015.

Mid Sussex is also preparing a Traveller Sites Document for the period to 2031. There is a public consultation on this draft Plan in August/September 2014 and it is anticipated that it will be published in December/January and submitted to the Secretary of State in March 2015.

Arun is preparing a Local Plan and this has been published for consultation from the 30th October for six weeks. Submission to the Secretary of State is expected in early 2015.

Arun will also be preparing a Traveller Sites Document and Area Action Plan for the Littlehampton Economic Growth Area and a Site Specific Allocations Document for Ford and Fontwell. The draft timetable for these is available in Arun's Local Development Scheme

Strategic Planning Issues

The following have been identified as strategic planning issues:

- Housing need
- Gypsies and Traveller accommodation.

These are indirect rather than direct strategic issues because they cross housing market area boundaries rather than the respective district boundaries.

Liaison and working arrangements

Arun District Council and Mid Sussex District Council have been working together through the following mechanisms:

- Liaison between the Coastal West Sussex and Greater Brighton Strategic Planning Board and the Northern West Sussex Districts
- formal consultation as the respective local plans have progressed
- both authorities are partners in the Coast to Capital Local Enterprise Partnership (LEP), and their Leaders are members of the Joint Committee set up to agree and implement the Strategic Economic Plan for the LEP

- Through Arun's Local Plan Advisory Group; a group which advises Arun on the development and drafting of its plans.

The following exclusive meetings were held between the two authorities to discuss their emerging plans and agree this Memorandum of Understanding:

- Duty to Cooperate meeting 19th June 2014 (officers)
- Arun and Mid Sussex Planning Portfolio Holders Duty to Cooperate meeting (1st September 2014).

Outcomes

Mid Sussex

The Objectively Assessed Housing Need for Mid Sussex is assessed as 516 homes per annum (2014-2031). Before Mid Sussex sets its proposed housing provision number, it is undertaking an assessment of neighbouring authorities' unmet housing needs. The Council has commissioned consultants to carry out a sustainability appraisal to assess the impacts of meeting those needs in Mid Sussex and the impacts on adjacent areas of those needs not being met. The results will be shared with the neighbouring authorities¹.

The need for permanent Gypsy and Traveller accommodation in Mid Sussex is assessed to be 34 pitches (2011-2031). No need exists for Travelling Show Person accommodation. The quantum of sites proposed in the draft Traveller Sites Document is considered sufficient to meet this need without there being any dependency on other authorities.

Arun District Council

The Objectively Assessed Housing Need for Arun is assessed as 580 homes per annum (2011-2030). Arun has not been requested to accommodate any unmet needs from its directly adjacent authorities but has accommodated the needs Arun's part of the South Downs National Park within the Arun Local Planning Authority area.

The need for Traveller accommodation has been assessed but will need to be reviewed due to our consultants advising of a change methodology.

Ongoing Cooperation

It is agreed that the two authorities will continue to actively and diligently cooperate on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.

Signed:

Cabinet Member for Planning and Infrastructure

Cabinet Member for Planning

¹ Draft results are expected late September 2014.

Arun District Council

Mid Sussex District Council

Dated:

Dated:

Arun District Council Officer Response to Crawley Borough Council's Duty to Cooperate Letter

Housing. Your strategy (statement of common ground) has been for Crawley to work with Reigate & Banstead, Horsham and Mid Sussex to assist with its unmet needs. At present we consider Horsham and Mid Sussex are intending to provide for some of the unmet needs for Crawley whilst Reigate and Banstead's recent Examination Report makes it clear that R&B will be accommodating some of Crawley's needs.

We understand that CBC is working closely with its adjacent authorities who have agreed to seek to accommodate CBC's unmet needs. At present, it is not known how much of these needs will be able to be met by these authorities. Arun can not therefore determine if there would be a legitimate call for sites in Arun for CBC.

Within Arun's own housing market area our adjacent local planning authority of Chichester has determined that it can not meet its objectively assessed needs whilst our other adjacent local planning authority of Worthing considers it is very unlikely to be able to accommodate its own needs. Arun's objectively assessed housing range (incorporating the parts of the district within the South Downs local planning authority) is 550-650 homes per annum and the maximum deliverable has been established as 700 units per annum. Arun's submission target for the district needs is 580 units per annum. It is unknown what range, if any, of unmet needs may be requested from Chichester and Worthing or beyond. Arun's publication Local Plan makes it clear that active and ongoing evidence gathering and strategy development on the larger than local issues – including housing needs will continue to be considered through the framework of Coastal West Sussex and Greater Brighton Strategic Planning Board.

Employment: We support CBC's sequential approach to employment land. This approach means that jobs will be located as close as possible to the centre of Crawley. For this reason Arun does not consider it to be appropriate to seek to accommodate the employment growth needs of Crawley.



Dear Councillor,

Crawley Borough Local Plan 2015 – 2030: Duty to Cooperate

As you may be aware, the Crawley Borough Local Plan 2015 – 2030 was approved for publication and submission at the Full Council meeting held on 23 July 2014. The publication consultation will take place for a 6-week period commencing **Monday 1 September until Monday 13 October 2014**. The Local Plan has been prepared in the context of substantial, positive, ongoing cross-boundary working carried out over the various functional strategic areas in which Crawley forms part and I acknowledge and thank you for this.

The purpose of this letter is to draw your attention to the critical outcomes of the Crawley Local Plan in relation to meeting objectively assessed development needs, to invite your comments on the information provided and to formally request confirmation of the role in your authority to be able to play in assisting my council in addressing identified unmet development needs under the Duty to Cooperate provisions.

I have extended the range of this letter to those authorities considered to have some degree of strategic planning relationship with Crawley even where administrative boundaries are not shared.

More detail of Crawley Borough Council's understanding of all the joint working is provided in the Local Plan Duty to Cooperate Statement (July 2014). I have enclosed an internal pre-consultation draft of this document with this letter for your information and would welcome comments on this, preferably in advance of our formal publication consultation (i.e. by 28 August 2014). However, I recognise this is a tight deadline and we are in the holiday period. Therefore, if this is not possible, then comments as part of the consultation period would also be valued.

In light of Crawley's tight administrative boundaries, Gatwick Airport 'safeguarded' land for a potential second runway and physical constraints such as aircraft noise contours, flooding, nature conservation constraints and few infill opportunities due to the age and planned nature of the new town, there is very limited land within the borough for accommodating further development.

The total **unmet need**, assessed against the objectively assessed needs for both housing and employment, arising from within Crawley over the Plan period (2015 – 2030) is:

- Housing: 3,130 dwellings
- Employment: 35ha of land for B Use Classes

The following sections of this letter set out a summary of Crawley's position in relation to its housing and employment needs. Comments would be welcomed in relation to whether your authority is in agreement with the conclusions reached.

Housing

Ongoing work undertaken by Crawley Borough Council seeks to maximise the extent to which needs arising from Crawley can be accommodated within the borough's boundaries. This has included

undertaking a substantial Urban Capacity Study revisiting every potential site within each of the town's neighbourhoods; removing all policy constraints and reassessing these in light of the competing need to provide land for development; undertaking additional public consultation, technical and viability studies on the potential of additional sites, and reassessing the potential for windfalls in light of the new Planning Practice Guidance. This work has ensured the total supply of land for housing within the borough has been increased by a capacity of 1,095 net dwellings: from 3,800 dwellings in the preferred strategy Crawley Local Plan (October 2012) to 4,895 dwellings in the submission Crawley Local Plan (September 2014).

Crawley's submission Local Plan confirms that the supply-led capacity figure over the 15 year Plan period to 2030 for Crawley is a minimum of 4,895 net dwellings. This is against an objectively assessed housing need equal to 535 dwellings per annum; totalling 8,025 net dwellings over the same Plan period. This leaves a total unmet needs figure of 3,130 to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

It is continued to be expected that the majority of this unmet housing need arising from Crawley will be accommodated within the wider northern West Sussex Housing Market Area. Agreement has already been formally reached with Reigate and Banstead Borough Council through an acknowledgement confirmed within the Reigate and Banstead Core Strategy (2013) that some of the housing anticipated to meet in-migration into the borough will help address unmet needs arising from Crawley. The northern West Sussex Authorities' Position Statement (2012) also indicated that some of Crawley's unmet needs will be accommodated within the wider housing market area, through housing delivery levels proposed by Horsham and Mid Sussex District Councils within draft Local Plans. The emerging update to the Position Statement continues to indicate that this is the case. Paragraph 6.6 set out in the draft submission Horsham District Planning Framework confirms that the housing level set out in the Plan provides a degree of accommodation for housing need arising from within Crawley which it recognises is unable to be met within our administrative boundaries.

Economic

In addition to the unmet housing needs, joint working undertaken across northern West Sussex through the joint commissioning of the recent Economic Growth Assessment (EGA), 2014, has highlighted significant anticipated levels of economic growth in the economic sub-region. Much of the identified growth is associated with the economic strength of Crawley and Gatwick.

Due to the land supply constraints faced by the borough, and particularly the continued uncertainty in relation to a potential second runway at Gatwick Airport, Crawley is currently anticipating a shortfall of 35ha of employment land for B Use Classes, against an objectively assessed identified need of 77ha, as emerged from the EGA. In accordance with the Local Enterprise Partnership's Strategic Economic Plan (2014), this unmet need should first be directed to the Heart of Gatwick (Crawley and North Horsham).

The submission Crawley Local Plan confirms Crawley's commitment to working with neighbouring authorities to address this unmet need in the most appropriate manner and locations, and sets out the hierarchy suggested by the Northern West Sussex Economic Growth Assessment, which is complementary to the approach promoted by the Coast to Capital Local Enterprise Partnership's Strategic Economic Plan. Through positive joint working under Duty to Cooperate, and utilising the sequential approach established through Crawley's submission Local Plan (in the first instance this is land within Crawley; if this is not possible then land 'at Crawley'; and then, finally, to land near Crawley/Gatwick), Crawley Borough Council is committed to working alongside its neighbouring authorities to scope locations for accommodating unmet economic needs.

I would welcome a written response from your local authority by 28 August, to help formalise the understanding between us with regard to whether your authority is able to assist Crawley in meeting its unmet needs and whether you consider the Crawley Local Plan Duty to Cooperate Statement accurately describes the progress to date.

Similarly, please let me know if your authority considers there are any other strategic issues not sufficiently covered or ways in which you believe Crawley may be able to assist you in your strategic planning needs.

Please contact me or my officer, Elizabeth Brigden, should you have any questions or require further clarification with any of the content included above.

I look forward to continuing to work with you in the future to seek positive solutions to these challenging strategic issues.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter Smith', with a horizontal line underneath.

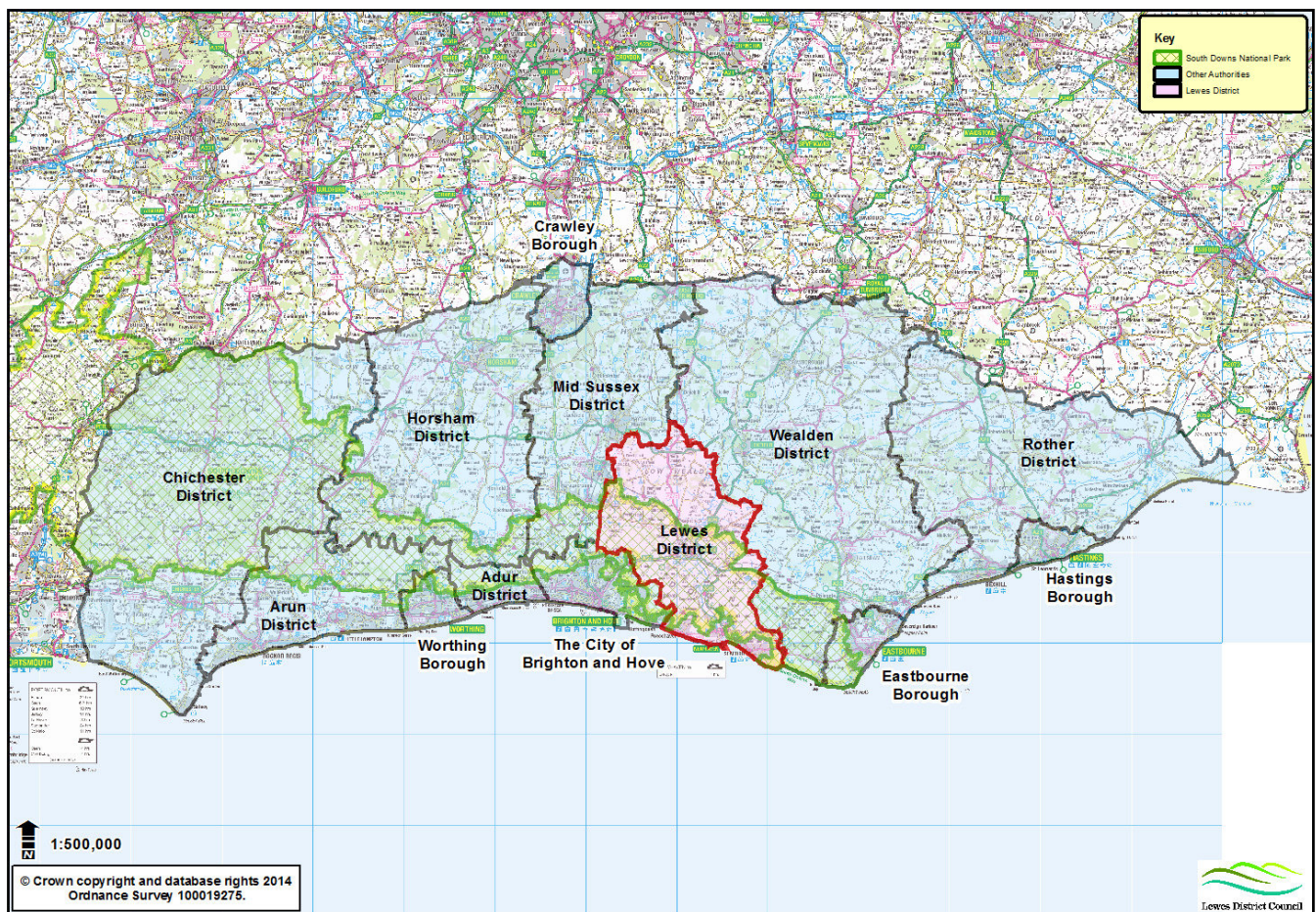
Cllr. Peter Smith
Cabinet Member for Planning and Economic Development

Duty to cooperate: Statement of common ground Cross-boundary working and meeting housing needs

This agreement is between:

- Lewes District Council
- South Downs National Park Authority
- Adur District Council
- Arun District Council
- Brighton and Hove City Council
- Chichester District Council
- Crawley Borough Council
- Eastbourne Borough Council
- Hastings Borough Council
- Horsham District Council
- Mid Sussex District Council
- Rother District Council
- Wealden District Council
- Worthing Borough Council

Map 1: Lewes district in context



1. Background

- 1.1 Section 110 of the Localism Act 2011 places a legal duty on local planning authorities and other prescribed bodies to cooperate with each other on strategic planning matters insofar as they are relevant to their administrative areas throughout the preparation of their development plan documents. The National Planning Policy Framework (NPPF) 2012 reiterates this duty and requires an independent inspector to assess whether the development plan they are examining has been prepared in accordance with the duty to cooperate.
- 1.2 It is expected that engagement and cooperation will be constructive, active and ongoing in order to maximise effectiveness throughout plan preparation as well as implementation, delivery and subsequent review. The national Planning Practice Guidance confirms that this is not a duty to agree but that local planning authorities should make every effort to secure the necessary cooperation on cross-boundary strategic matters before submitting development plan documents for examination. The examination will test whether the duty has been complied with.

2. Purpose

- 2.1 This statement of common ground sets out how Lewes District Council and South Downs National Park Authority have actively and positively sought to comply with the duty to cooperate in the preparation of the Joint Core Strategy development plan document on strategic planning matters, with the main cross-boundary factor affecting Lewes district being housing provision.
- 2.2 A summary of the processes and meetings undertaken with all relevant organisations in undertaking the duty is set out in the associated submission document Joint Core Strategy: Duty to Cooperate Compliance Statement (August 2014). Other relevant information on seeking to meet housing need in Lewes district is explained in the Joint Core Strategy Background Paper: Justification for the Housing Strategy (May 2014).
- 2.3 This statement also describes the established mechanisms for ongoing cooperation on strategic matters.

3. Housing Market Area (HMA)

- 3.1 Lewes district was identified in the South East Plan¹ as forming part of the Sussex Coast HMA², which is focused on the city of Brighton and Hove and extends from Bognor Regis in the west to Seaford in the east. This is not to suggest that Bognor Regis is in the same housing market as Lewes, but that the housing markets in this coastal strip overlap to such a degree that distinct

¹ South East Plan (2009) now revoked and archived

² South East Plan (2009), now revoked and archived, diagram H1

boundaries cannot be defined. The extent of this HMA was reconfirmed in the Strategic Housing Market Assessment³ undertaken for the coastal West Sussex authorities in November 2012.

- 3.2 Research by the Department for Communities and Local Government showed that HMAs operate as an overlapping system of tiers and that it is not possible to precisely define the boundary of a specific housing market area due to the variety of methodologies that can be used⁴. Therefore a number of different permutations can potentially exist as Lewes district's HMA.
- 3.3 Within the broad Sussex Coast area a distinct local HMA exists. This is focused on Brighton and Hove and exerts influence across most of Lewes district. Small parts of the district also have some overlap with the Eastbourne, High Weald and Crawley/Gatwick housing market areas, although for the vast majority of the district it is the Sussex Coast HMA that is of relevance⁵.
- 3.4 Two broader strategic HMAs⁶ have also been identified, again focused on Brighton and Hove.
1. The administrative areas of Brighton and Hove, Lewes, Adur, Worthing, Horsham, Mid Sussex, Crawley, Wealden and Eastbourne.
 2. A broader Coastal Sussex HMA centred on Brighton and Hove stretching from Seaford along the coast to West Wittering and inland into the South Downs National Park to settlements such as Lewes and Midhurst, covering the administrative areas of Lewes, Brighton and Hove, Adur, Worthing, Arun and Chichester.
- 3.5 The District Council and National Park Authority have sought to work with all authorities forming part of the main Sussex Coast HMA, as well as those authorities in HMA's where there is a degree of overlap.

4. Meeting objectively assessed housing needs

- 4.1 Despite extensive work, the Council and SDNPA consider that, due to extensive and well documented environmental and infrastructure constraints, objectively assessed housing needs in Lewes district cannot be met within the sustainable development requirements of the National Planning Policy Framework. This position will be tested at the examination of the Joint Core Strategy.
- 4.2 In seeking to locate the unmet need elsewhere the local level HMA, whereby most of Lewes district relates intimately with Brighton and Hove, was considered first. This was followed by the wider Coastal Sussex HMA, starting with the most directly related authority areas. Unfortunately the other authorities face similar constraints to Lewes district, leaving them unable to

³ <http://www.arun.gov.uk/main.cfm?type=HOUSING#SHMA> 2012

⁴ Geography of Housing Market Areas Final Report, DCLG (2010)

⁵ Housing Market Assessment of Lewes, DTZ (2008)

⁶ Coastal West Sussex Strategic Housing Market Assessment Update, GL Hearn (2012)

meet their objectively assessed housing needs. It is very likely, as documented in the Sussex Coast HMA Duty to Cooperate Housing Study, that the Sussex Coast authorities will be unable to meet the combined housing need of the Sussex Coast HMA.

- 4.3 A 'no stone unturned' programme of additional work, seeking to reduce the gap between the district's identified housing capacity and its housing needs for the plan period, was agreed by the council's Cabinet. This work led to some focussed amendments to the proposed submission version of the Joint Core Strategy, including an increase in the proposed housing target from 4,500 to 5,600. Relevant information on seeking to meet housing need in Lewes district is explained in the paper, Justification for the Housing Strategy⁷.
- 4.4 As, to date, neighbouring authorities and those authorities making up the Sussex Coast HMA have been unable to identify any potential to help meet Lewes district's housing needs, broader strategic housing areas and routes to more innovative solutions for meeting the collective strategic housing need have been explored and implemented.

5. Compliance with the duty to cooperate

- 5.1 In the absence of government guidance (at the time) but taking account of evidence arising from Inspectors reports into Local Plans, together with the need to continue to progress the Joint Core Strategy, the council and SDNPA, together with partner authorities in the Sussex Coast HMA, took a pragmatic approach to addressing the Duty to Cooperate. This approach is considered to be consistent with the Planning Practice Guidance on the Duty to Cooperate, which was published in March 2014 after the cross-boundary cooperative working was already underway.
- 5.2 A Coastal West Sussex Partnership had previously been set up to strengthen the coastal economy, bringing together businesses and the public sector to work across administrative boundaries and form the foundations for future infrastructure delivery and growth. This existing partnership has been widened to include LDC and SDNPA as partners on the Coastal West Sussex and Greater Brighton Strategic Planning Board. Lead planning members for all the constituent authorities sit on the Board, which has an advisory remit and decisions made need to be ratified by the individual planning authorities.
- 5.3 The Strategic Planning Board is in place to:
- Identify and manage spatial planning issues that impact on more than one local planning areas across the Coastal West Sussex and Greater Brighton area; and
 - Support better integration and alignment of strategic spatial and investment priorities in the Coastal West Sussex and Greater Brighton area.

⁷ Joint Core Strategy Background Paper: Justification for the Housing Strategy (May 2014).
http://www.lewes.gov.uk/Files/plan_HBP_May_2014.pdf

- 5.4 The Board has signed a memorandum of understanding⁸ and agreed terms of reference⁹ as a framework for cooperation. It has also a Local Strategic Statement¹⁰ which sets out the long term strategic objectives for the period 2013-2031 and the spatial priorities for delivery in the medium term to support the delivery of regeneration, jobs and homes while protecting the high quality environment. It is proposed that the Local Strategic Statement will be reviewed and refreshed in October 2014.
- 5.5 Collaborative working among planning officers across East Sussex has been long-established through the channels of the Planning Liaison Group (chief planning officers), East Sussex Local Plan Managers Group and the East Sussex Development Management Forum. In addition, the East Sussex Strategic Planning Members Group (ESSPMG) was set up in 2013 to enhance and endorse cooperation at the political level. The group consists of the portfolio holders for planning assisted by officers from all local authorities in East Sussex, including SDNPA.
- 5.6 All ESSPMG member authorities are signatories to a memorandum of understanding, which was drawn up to formalise and give direction to ensure active, constructive and ongoing joint working arrangements. The memorandum of understanding sets out the group's key purposes as raising awareness of cross boundary issues; and to explore any matters of concern to understand how they are affecting development and/or delivery of plans. Although the ESSPMG is primarily for East Sussex authorities, it is recognised that strategic planning issues do not constrain themselves to county boundaries and therefore neighbouring authorities attend meetings of the group if an issue is being explored that is relevant to that authority area.
- 5.7 Additionally the council and SDNPA have instigated or attended many meetings and events specifically or indirectly to address matters relevant to the duty to cooperate. A schedule of key meetings and joint-working, and their key outcomes, with local planning authorities and other organisations subject to the duty to cooperate is set out in Appendix 1 of the Duty to Cooperate Compliance Statement. These have facilitated constructive and active cooperation with the other authorities, in addition to existing mechanisms of cooperation such as consultation responses. These meetings include those held with the purpose of establishing an overall picture of housing need across the sub-region and determining whether any local planning authorities had spare capacity to accommodate unmet needs from areas that were unable to meet their own needs such as Lewes district.
- 5.8 The Duty to Cooperate Compliance Statement has been circulated to all local planning authorities in East and West Sussex and no concerns have been raised.

⁸ <http://www.coastalwestsussex.org.uk/wp-content/uploads/FINAL-CWS-SPB-MoU-Feb-2014-Final-Signed.pdf>

⁹ <http://www.coastalwestsussex.org.uk/wp-content/uploads/CWS-Strategic-Planning-Board-TOR-Oct-13-Final-Version.pdf>

¹⁰ <http://www.coastalwestsussex.org.uk/wp-content/uploads/FINAL-LSS-for-CWS-Gtr-Brighton-30-Jan-14.pdf>

- 5.9 The authorities agree that a series of officer and member level meetings and events have taken place, as set out in Appendix 1 of the Duty to Cooperate Compliance Statement, during the production of the Joint Core Strategy, covering matters relevant to the duty to cooperate. To date, no local planning authorities have indicated that they have identified surplus housing capacity that could assist in meeting Lewes district's unmet housing needs.
- 5.10 The authorities agree that cooperation is an ongoing process and dialogue and partnership working will therefore continue in order to address cross-boundary strategic matters, including the issue of meeting development needs. Where a LPA has an unmet objectively assessed housing need, the LPA should demonstrate and justify why and to what degree it cannot meet the need prior to approaching other appropriate authorities with regard to accommodating the unmet need.
- 5.11 The Coastal West Sussex and Greater Brighton authorities are committed to cross-authority working in the pursuit of sub-regional and longer term solutions to meeting the housing needs of the Sussex Coast HMA. In this vein the Council and SDNPA are committed to a review of Spatial Policies 1 and 2 of the Joint Core Strategy if any options for this are demonstrated to be deliverable within Lewes District.

6. Housing Requirements for the Coastal West Sussex and Greater Brighton Sub-Region

- 6.1 The Coastal West Sussex and Greater Brighton Strategic Planning Board was established with the intent of identifying the extent of housing need and looking at options to meet it. To facilitate cross-boundary cooperation in addressing the issue, a joint Housing Study (Duty to Cooperate)¹¹ has been produced by the local authorities that comprise the Coastal West Sussex and Greater Brighton Strategic Planning Board¹².
- 6.2 The study pulls together evidence from a range of individual studies produced by each authority to provide a consistent and objective assessment of housing requirements in each authority and across the Sussex Coast HMA addressing the need and demand for market and affordable housing.
- 6.3 The study concludes that the Sussex Coast HMA is highly unlikely to be able to deliver the full level of required housing development in light of the significant environmental, landscape and infrastructure constraints to development which exist. Strategic infrastructure constraints in the Sussex Coast HMA are still those which were identified and tested through the development of the South East Plan – particularly capacity issues along the A27, around the Chichester Bypass, Arundel and Worthing, as well as the A259. Equally there are a number of more local routes which are at or near capacity.

¹¹ Housing Study (Duty to Cooperate), GL Hearn (2013)

¹² Arun District Council; Chichester District Council; Worthing Borough Council; Adur District Council; Brighton & Hove City Council, Lewes District Council and the South Downs National Park Authority.

- 6.4 There is agreement between the Coastal West Sussex and Greater Brighton authorities that the evidence shows that, collectively, they are unable to meet the full objectively assessed housing needs. Current evidence implies that it may be feasible to accommodate a maximum of around 75% of the assessed level of need across the sub-region¹³.
- 6.5 The most significant shortfall against objectively assessed needs is expected to arise in the area of the sub-region centred on the City of Brighton and Hove, including Lewes district, Adur and Worthing. This is primarily a function of geography with limited development potential in the areas between the national park and the sea.
- 6.6 This situation persists from that which existed during the preparation of the South East Plan (now revoked), which resulted in the South East Plan's housing requirements for the authorities in the Sussex Coast HMA being set at least 27-30% below demographic projections¹⁴.
- 6.7 In August 2013 a meeting took place between the Council, SDNPA, the West Sussex district/borough councils and Brighton and Hove City Council. The purpose of the meeting was to discuss a way forward, in accordance with the duty to cooperate, regarding seeking to meet the sub-region's housing needs in the light of the levels of provision likely to be achieved through the recently adopted and emerging Local Plans. It was acknowledged that most LPAs are unable to meet their objectively assessed housing needs in their Local Plans because of recognised capacity constraints. Those authorities that anticipated being able to meet their own housing needs also experience capacity constraints such that they are unlikely to be in a position to accommodate the anticipated shortfalls arising in the other authority areas.
- 6.8 It was agreed that the authorities would continue to work together in order to identify, if possible, longer term strategic solutions to the identified shortfall of housing provision across the sub-region, including necessary strategic infrastructure and appropriate delivery mechanisms. This work would be undertaken on the understanding that each authority would look to meet future housing needs within their own local housing market area(s) first before looking at options beyond their market area(s) if necessary. Subsequently the Coastal West Sussex and Greater Brighton authorities signed a memorandum of understanding and produced its Local Strategic Statement, setting out the commitment and framework through which they will actively cooperate in seeking to address the sub-region's housing needs on an ongoing basis.
- 6.9 Wealden and Mid Sussex are neighbouring districts to Lewes but are not significant constituents of the Sussex Coast HMA. To date neither authority has identified that it may have capacity to help meet some of Lewes district's unmet housing needs. Mid Sussex is currently working on a revised District Plan. Before setting its proposed housing target, Mid Sussex is undertaking

¹³ Housing Study (Duty to Cooperate), GL Hearn (2013)

¹⁴ Housing Study (Duty to Cooperate), GL Hearn (2013)

an assessment of neighbouring authorities' unmet housing needs and, as part of this process, Lewes District Council has provided details of its housing needs shortfall. This work will involve a sustainability appraisal, carried out by consultants, to assess the impacts of meeting unmet needs in Mid Sussex and the impacts on adjacent areas of those needs not being met. It is currently too soon for Mid Sussex to indicate whether it will be able to assist in meeting some of Lewes district's unmet need. However collaboration at officer and Lead Member level is ongoing in accordance with the Memorandum of Understanding between the two councils and SDNPA.

- 6.10 Wealden has a Core Strategy (adopted February 2013) with a housing target that does not meet its own objectively assessed need, leaving Wealden unable to meet assist with meeting any of Lewes district's unmet needs at the current time. Wealden's Core Strategy will be subject to review in 2015 which will consider the environmental impact of potential development on sites of international importance and other constraints of the area. Wealden is currently at the early stages of undertaking a new Strategic Housing Market Area Assessment. While it is too early to know whether Wealden will be in a position to assist in meeting any of Lewes district's unmet needs in the future, Lewes District Council and SDNPA are engaging with Wealden in this process and will also continue to work collaboratively through the East Sussex Strategic Planning Members Group.

7. East Sussex Strategic Planning Members Group

- 7.1 With regard to housing provision ESSMPG has agreed to consider the definition of HMAs affecting East Sussex and to establish a protocol for early liaison and consistency on this work, which is expected to draw on the 2011 Census migration patterns. It is recognised that HMAs are likely to extend beyond the county boundary and the protocol should include engagement with adjoining authorities, especially to the north and west (including the CWSGB Strategic Planning Board). The principle of linked assessments of housing and employment needs in future reviews and a 'robustness review' of housing market indicators in the existing countywide housing monitoring/reporting framework, in line with the National Planning Practice Guidance, have also been agreed.
- 7.2 Through the ESSPMG work is actively underway on establishing a common evidence base and planning policy direction for specific topics that require detailed policies and have commonality across East Sussex. The currently identified topic areas are Development in the High Weald AONB; Older Persons Housing; Equestrian Development; Biodiversity and Green Infrastructure; Tourism; Sustainable Transport; Energy Development; and Community Facilities.
- 7.3 The topic areas are being progressed by working groups comprised of all East Sussex local planning authorities and currently consists of the identification of inconsistencies, gaps or other weaknesses in the evidence base and policy coverage. This will be followed by any necessary additional evidence gathering, identification of common policy elements and ascertaining reasons

for any local variations. As the majority of the issues being explored are detailed in nature, this work is of greater relevance to the Development Management policies each planning authority is preparing.

Local Authority:

Signed:

Print Name:

Date:

For Lewes District Council.

Signed:

Print Name:

Date:

Background Paper 9: Response to Crawley Submission Local Plan

Background Paper

The following is the representation that is proposed in response to the consultation on the Crawley Proposed Submission Draft Local Plan.

Response to Crawley Submission Draft Local Plan 2015-2030

Thank you for consulting Arun District Council on your Proposed Submission Local Plan and accompanying maps and documents. After reviewing these we have the following officer response, that will be presented to our Sub-committee at the end of October and then Council for final sign off.

We understand that CBC is working closely with its adjacent authorities who have agreed to seek to accommodate CBC's unmet need. It is noted that there is a slight inconsistency between the numbers within the Duty to Co-operate Statement (August 2014) and the Housing policy of the Plan. It is presumed this is due to the base year that is being used but slight clarification before submission may be helpful.

As mentioned within the response to the Duty to Co-operate request, there is expected to be an under supply in terms of neighbouring areas meeting their need, that is a recognised characteristic of the Sussex Coast Housing Market.

It is suggested that Policy ENV9 be amended slightly so that there is a clearer link to the table within the reasoned justification that includes the levels expected in Crawley against the expected Code levels, to ensure there is clarity and future proofing of the Plan once the Code for Sustainable Homes is phased out.

Crawley 2030. Pre Submission Consultation

From: LocalPlanUpdate [<mailto:LocalPlanUpdate@ Crawley.gov.uk>]
Sent: 29 August 2014 17:44
To: LocalDevelopment Framework
Subject: Crawley Local Plan Notification of Statutory Consultation

LOCAL PLAN UPDATE

29 August 2014



Crawley 2030 – statutory submission consultation 1 September to 13 October 2014

(Regulation 19, 20 and 35 of the Town and Country Planning (Local Planning) (England) regulations 2012)

Dear Sir / Madam,

We are writing to you as you have previously engaged in the Local Plan process or you have expressed an interest in being notified of future stages of the Crawley Local Plan.

The council has been preparing its new Local Plan over the past few years in consultation with residents, businesses and other key stakeholders and government bodies. The Local Plan contains the strategic planning policies and principles which will shape the future of the town over the period 2015-2030.

We would like to thank everyone that has participated in the process to date, as the feedback provided at each stage has enabled us to prepare a document that we believe to be a robust plan for the future.

Crawley Borough Council approved the draft submission Local Plan for its formal statutory consultation stage and submission at the Full Council meeting on 23 July 2014.

As a result, a statutory six-week consultation period will take place from 1 September to 5pm on 13 October 2014.

During this time we would like to invite you to make comments on the submission Local Plan, the Local Plan Map and the Sustainability Appraisal. If you would like to make a comment you consider whether the document complies with legal requirements, the duty to co-operate and is sound (please see the guidance notes for more information). Any comments submitted after the six-week period cannot be accepted.

All comments received within the consultation period will be submitted to the Secretary of State, who will appoint a planning inspector to carry out an independent examination

of the Local Plan and its evidence base. There will also be an opportunity to participate in specific public examination hearings for those who indicate that they wish to do so when completing the representation form.

If you require any advice when completing the representation form, Crawley Borough Council will be holding drop-in sessions run by an independent planning consultant to provide more information on how to formally engage in the planning process. These will be held at:

- Thursday 25th September 18:30-20:30 Venue TBC
- Thursday 2nd October 17:00-18:30 and 19:00-20:30 Crawley Library, Southgate Avenue RH10 6HG
- Monday 6th October 18:30-20:30 Broadfield Youth and Community Centre, Broadfield Barton, Rh11 9BA

For further information and details of the drop in sessions, please visit the website www.crawley.gov.uk/crawley2030 or call us on 01293 438624.

All comments made must be submitted in writing by completing the representation form. This can be done by using one of the following methods:

- Online using the council's eform at www.crawley.gov.uk/crawley2030
- Email: forward.planning@crawley.gov.uk
- Post: Forward Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley RH10 1UZ.

Copies of the representation form and supporting guidance notes can be downloaded online at www.crawley.gov.uk/crawley2030 or paper copies are available at the Town Hall, Crawley Library or Broadfield Library.

During the consultation period the submission Local Plan and all of its supporting documents will be available to view online at www.crawley.gov.uk/crawley2030

Hard copies will also be available to view at the following locations:

- Town Hall: The Boulevard, Crawley RH10 1UZ. Phone: 01293 438000. Opening hours: Monday to Friday 8.30am-5pm.
- Crawley Library: Southgate Avenue, Southgate, Crawley RH10 6HG. Phone: 01293 651744. Opening hours: Monday to Friday 9am-7pm and Saturday 9am-5pm.
- Broadfield Library: 46 Broadfield Barton, Broadfield, Crawley RH11 9BA. Phone: 01293 543298. Opening hours: Monday to Friday 10am-5pm and Saturday 10am-2pm.

For further information, a Notification of Public Consultation can be found in the Crawley Observer newspaper and on the Crawley 2030 website.

If you have any queries please contact the Forward Planning team either by email to forward.plans@crawley.gov.uk or call us on 01293 438624.

Kind regards

The Forward Planning Team

More information

For more information, visit www.crawley.gov.uk/crawley2030 where you can find the Local Plan's evidence base documents, download the latest version of the Local Plan and the latest timetable.

Contact us

To contact the Forward Planning Team, email forward.plans@crawley.gov.uk or call 01293 428624.

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