



# Public Document Pack

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

Tel: (01903 737500)  
Fax: (01903) 730442  
DX: 57406 Littlehampton  
Minicom: 01903 732765

e-mail: [committees@arun.gov.uk](mailto:committees@arun.gov.uk)

Committee Manager Andrew Bishop (Ext. 37984)

24 September 2021

## PLANNING POLICY COMMITTEE

A meeting of the Planning Policy Committee will be held in the **Council Chamber at the Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF** on **Wednesday 6 October 2021 at 6.00 pm** and you are requested to attend.

Members: Councillors Bower (Chair), Hughes (Vice-Chair), Chapman, Charles, Coster, Elkins, Goodheart, Jones, Lury, Thurston and Yeates

**PLEASE NOTE:** Subject to Covid-19 Risk Assessments members of the public are advised of the following:

Where public meetings are being held at the Arun Civic Centre in order to best manage the safe space available, members of the public are in the first instance asked to watch the meeting online via the Council's Committee pages – the meeting will be available to watch live via the internet at this address: [Arun District Council](#)

- a) Where a member of the public has registered to take part in Public Question Time, they will be invited to submit the question in advance of the meeting to be read out by an Officer. In response to the continuing health guidelines, there will be very limited public access to this meeting. Admission for public speakers will be by ticket only, bookable when submitting questions. Attendees will be asked to sit in an allocated seat in the public gallery on a first come first served basis. Only one ticket will be available per person.
- b) It is recommended that all those attending take a lateral flow test prior to the meeting.
- c) All those attending the meeting will be required to wear face coverings and maintain safe distancing when in the building/meeting room.
- d) Members of the public must **not** attend any face to face meeting if they or a member of their household have Covid-19 symptoms.

Any members of the public wishing to address the Committee meeting during Public Question Time, will need to email [Committees@arun.gov.uk](mailto:Committees@arun.gov.uk) by 5.15 pm on Tuesday 28 September in line with current Procedure Rules. It will be at the Chief Executive's/Chair's discretion if any questions received after this deadline are considered. Permitted questions will be read out by an Officer.

For further information on the items to be discussed, please contact: [committees@arun.gov.uk](mailto:committees@arun.gov.uk)

## **A G E N D A**

### 1. **APOLOGIES**

### 2. **DECLARATIONS OF INTEREST**

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

Members and Officers should make their declaration by stating:

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

### 3. **MINUTES**

(Pages 1 - 6)

The Committee will be asked to approve as a correct record the Minutes of the Planning Policy Committee held on 20 July 2021.

### 4. **ITEMS NOT ON THE AGENDA THAT THE CHAIR OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES**

### 5. **PUBLIC QUESTION TIME**

To receive questions from the public (for a period of up to 15 minutes).

[15 minutes]

6. MOTION

The following Motion was submitted in accordance with Council Procedure 15.1 and 15.2 and referred to the Committee by Full Council on 15 September 2021.

**Proposer: Councillor Dixon**

**Seconder: Councillor Thurston**

The Coastal Plain in the Arun District is low lying and flat – making it vulnerable to the risks arising from climate change, particularly rising sea levels. This land was under the sea once (as evidenced by the district's raised beaches), and, if recent climate change forecasts are to be believed, it can be again.

There are already thousands of existing homes on the Coastal Plain. Also, the Council is compelled by government policy to build a further 20,000 new homes.

Normally, in districts at risk of flooding, it is possible to build on higher ground but in the Arun district our higher ground is National Park, where there is a presumption against development, and so we are prevented from doing this. New homes can only be built on the Coastal Plain.

On the 5 December 2019, the Prime Minister said:

*“We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding.”*

And

*“The other thing we've got to do, we've got to put in long-term flood defences.”*

This Council supports these aims, as expressed by the Prime Minister.

The Council therefore calls on the Government to recognise the flood risks to the Coastal Plain arising from climate change, by commissioning a full and comprehensive risk assessment for the Coastal Plain, utilising the most up to date and credible scientific data available, in order to identify what mitigation measures will be required to protect new and existing communities.

The Council instructs the Chief Executive to write to the Secretary of State for Housing, Communities and Local Government to request a meeting to discuss this.

[30 minutes]

7. BUDGET 2022/2023 PROCESS (Pages 7 - 10)
- The report provides a summary of the budget process for 2022/23 which the Committee is asked to note.  
[20 minutes]
8. COASTAL CHANGE MANAGEMENT AREAS (Pages 11 - 24)
- Following Cabinet's approval, in October 2020, to allocate £30,000 to investigate the introduction of a Coastal Change Management Area (CCMA), the report contains a draft consultants' brief for endorsement by the Committee. The intention is to examine the stages needed to be followed and potential implications when considering the introduction of a CCMA. The report will also seek endorsement of how Planning Applications for development in coastal flood and erosion risk areas should be addressed ahead of the formal consideration of introducing a CCMA.  
[20 minutes]
9. INFRASTRUCTURE FUNDING STATEMENT (Pages 25 - 28)
- The Community Infrastructure Levy (CIL) Regulations 2010 (as amended) include a requirement for all planning obligation collecting authorities to prepare an annual Infrastructure Funding Statement (IFS) to be published on the Council's website at the end of the calendar year; reporting planning obligation income and expenditure from the previous financial year. This report summarises the factual update to the Arun District Council IFS which is available as Background Paper 1. [20 minutes]
10. ARUN LOCAL PLAN UPDATE (Pages 29 - 40)
- This report updates members on the issues affecting the progress of the Local Plan update and progressing a Vision and Objectives while anticipating significant Government planning and regulatory reforms. There are consequently, a number of options members may wish to consider on the approach to take for the Local Plan update and supporting evidence work, in view of the pending national planning reforms and also emergent critical issues arising under the 'Duty To Cooperate' affecting plan making and particularly delivery of development to the West of Arun in the A27 corridor.  
[30 minutes]

11. DEVELOPMENT MANAGEMENT POLICIES ENGAGEMENT FEEDBACK (Pages 41 - 46)

Following the meeting in June, the Planning Policy Committee agreed early engagement work could commence on the draft list of Development Management Policies identified for potential review. This report provides an update on that engagement work.

[20 minutes]

12. WEST SUSSEX TRANSPORT PLAN 2022-2036 CONSULTATION (Pages 47 - 54)

West Sussex County Council are reviewing their Local Transport Plan to update the County Council's approach to managing and investing in the transport network. This report therefore seeks agreement that the comments set out in this report form the basis for the Council's formal response to the West Sussex County Council document 'Draft West Sussex Transport Plan 2022-2036' (WSTP) [Background Paper 1] published for consultation from Friday 16 July to Friday 8 October.

[20 minutes]

13. DUTY TO COOPERATE - STATEMENT OF COMMON GROUND BETWEEN HORSHAM DISTRICT COUNCIL AND ARUN DISTRICT COUNCIL (Pages 55 - 68)

This report seeks Members' agreement that the Chair of Planning Policy Committee is authorised to sign the joint 'Statement of Common Ground' with Horsham District Council.

[30 minutes]

**OUTSIDE BODIES - FEEDBACK FROM MEETINGS**

Will be circulated separately to the agenda should there be any.

14. WORK PROGRAMME (Pages 69 - 72)

The Committee is required to note the Work Programme for 2021/22.

Note: If Members have any detailed questions, they are reminded that they need to inform the Chair and relevant Director in advance of the meeting.

Note: Filming, Photography and Recording at Council Meetings – The District Council supports the principles of openness and transparency in its decision making and permits filming, recording and the taking of photographs at its meetings that are open to the public. This meeting may therefore be recorded, filmed or broadcast by video or audio, by third parties. Arrangements for these activities should operate in accordance with guidelines agreed by the Council and as available via the following link [PART 8 - CP - Section 5 Filming Photographic Protocol](#)

This page is intentionally left blank

## PLANNING POLICY COMMITTEE

20 July 2021 at 6.00 pm

Present: Councillors Bower (Chair), Hughes (Vice-Chair), Chapman, Charles, Coster, Elkins, Jones, Lury, Thurston and Yeates

### 147. WELCOME

The Chair opened the meeting and welcomed Members of the Committee, the Public and Press, other Members and Officers participating in the evening's second meeting of the Planning Policy Committee under the newly adopted Committee structure and the first in person since the easing of restrictions.

### 148. APOLOGIES

An Apology for Absence had been received from Councillor Goodheart.

### 149. DECLARATIONS OF INTEREST

Councillor Charles declared a Personal Interest in Agenda Item 6 [A259 Corridor Improvements Consultation] as a Member of West Sussex County Council.

Councillor Elkins declared a Personal Interest in Agenda Items 6 [A259 Corridor Improvements Consultation] and 7 [Arun Infrastructure Investment Plan - Timetable Amendment] as a Member of West Sussex County Council.

### 150. MINUTES

The Minutes of the previous meeting held on 1 June 2021 were approved by the Committee.

### 151. ITEMS NOT ON THE AGENDA THAT THE CHAIR OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

The Chair confirmed that there were no urgent items.

### 152. PUBLIC QUESTION TIME

The Chair confirmed that there had been no questions from the public submitted for this meeting.

153. A259 CORRIDOR IMPROVEMENTS CONSULTATION

*[Councillors Charles and Elkins re-declared their Personal Interest made at the start of the meeting].*

The Chair welcomed Paul Eagle, Principal Transport Planner at West Sussex County Council, to the meeting. The Planning Policy and Conservation Team Leader then presented his report and explained the importance of the A259 corridor to Arun (to address growth, and relationships between key settlements and identified development sites in the District) and how it was recognised by the Department for Transport as part of the major road network.

Members then took part in a full debate on the item where a number of points were raised including:

- the crucial need for mitigation measures
- issues around land take, for example around roundabouts and bus lanes
- support for better cycling and walking lanes
- disappointment with the proposed speed limit of 60mph and impacts on safety to cyclists and pedestrians
- the number of roundabouts and the disruption caused to the flow of cycle ways even with priority given to cyclists
- concerns over time added to journey times
- support for roundabouts, even if they do slow journeys, due to their impact on reducing road traffic collisions
- whether the A259 should become dual carriageway
- concerns with the Wick roundabout, particularly the petrol station junction and supermarket filter lane
- concerns with the Church Lane roundabout currently (northbound traffic holding up eastbound traffic) and whether the proposals would make any difference to these issues, and potentially create new issues with the proposed closing of the southern arm which leads to a primary school
- data missing from the proposal - development north of the A259 between the Oystercatcher and Church Lane roundabouts
- positive response that it would allow more time for the consultation stage and for more comment to be fed into it

The Planning Policy and Conservation Team Leader, with the support of the Principal Transport Planner, provided Members with answers to all points raised during the debate. It was confirmed that the consultation would be extended to 15 August with a report published in October. This would be followed up by further data collection over the autumn/winter delayed by Covid 19 restrictions, with an outline business case then going to the Department for Transport. If this was approved, then a detailed design would be submitted to Government in October 2024 with a view to construction in 2025

The recommendations were then proposed and seconded.

The Committee

RESOLVED

That the Planning Policy Committee agree the consultation response to the A259 Corridor Enhancement Study as set out in strategic comments in section 1.6 and detailed comments in section 1.7 and Appendix 2.

154. ARUN INFRASTRUCTURE INVESTMENT PLAN - TIMETABLE AMENDMENT

*[Councillor Elkins re-declared his Personal Interest made at the start of the meeting.]*

Upon the invitation of the Chair, the Planning Policy and Conservation Team Leader explained the impact of changes to the Council's structure and the Constitution on timescales for the project and how the proposed amended timetable would be in place for the next financial year which would also allow for more information to be sought from infrastructure providers.

Members then took part in a full debate on the item where a number of points were raised including:

- the need for more information before the investment plan could be taken forward, including liaising with the Cabinet Member with responsibility for infrastructure at West Sussex County Council
- the possibility of a CIL forecast so Members could have some sense of what level of infrastructure project might be achievable and an idea of the schemes most likely to come forward
- the lack of other options available
- the need for more information from Parish Councils and an understanding of the frameworks they work within
- the need for Member liaison meetings where needs could be identified

The Planning Policy and Conservation Team Leader provided Members with answers to all points raised during the debate. The recommendations were then proposed and seconded.

The Committee

RESOLVED

That the Planning Policy Committee agree the updated timetable for the preparation, consultation and approval of the Arun Infrastructure Investment Plan 2022-2023.

155. ARUN HOUSING DELIVERY ACTION PLAN - UPDATE

Upon the invitation of the Chair, the Planning Policy and Conservation Team Leader presented his report, explaining the impact of the Government's Housing Delivery Test and how this triggered the need for an Action Plan to identify ways to improve housing delivery. This Action Plan had proactively sought to establish what issues were preventing or delaying landowners and developers from bringing forward planning applications, as well as attempted to improve the quality of applications that did come forward. He confirmed that the key finding from the low level of response was a call for greater flexibility for developers to allow proposals to come forward on their own merits and therefore more quickly. He also confirmed that if the recommendations were approved this would be renamed the Housing Delivery Action Plan to clarify its contents.

Members then took part in a full debate on the item where a of points were raised including:

- which developers were asking for this flexibility and would this report lead to suggestions to move things forward
- the Council's ongoing communication with developers and whether responses had been chased to improve the response rate
- whether flexibility meant sacrificing standards
- the need for new development to be climate resilient
- the design guide being a positive thing and the Council seeing better developments as a result
- the dichotomy of pushing for new sites without undermining existing developments

The Planning Policy and Conservation Team Leader provided Members with answers to all points raised during the debate. The recommendations were then proposed and seconded.

The Committee

RESOLVED that

1. The updated Housing Delivery Action Plan be published on the website;
2. The Committee considers the limited results of the consultation and barriers identified and notes that Officers will continue to work proactively on feasible measures to boost housing supply.

156. DUTY TO COOPERATE (STATEMENT OF COMMON GROUND) BETWEEN CRAWLEY BOROUGH COUNCIL AND ARUN DISTRICT COUNCIL

The Chair introduced this report and explained that the Council's change to a Committee structure had necessitated this action.

Members then took part in a full debate on the item where a number of points were raised including:

- the consequences if the Committee did not approve this item
- the location of Crawley to Arun
- sympathy for Crawley's issues but recognition that Arun also had issues
- Arun taking housing demand from Chichester and Crawley
- Horsham being closer to Crawley and should be bearing more of the need
- development needs in Brighton and Worthing/Adur, and the lack of green spaces
- water supply and waste water treatment sites

The Planning Policy and Conservation Team Leader provided Members with answers to all points raised during the debate. The recommendations were then proposed and seconded.

The Committee

RESOLVED

That the Chair of Planning Policy Committee be authorised to sign the joint Statement of Common Ground with Crawley Brough Council.

157. WORK PROGRAMME

The Committee noted the Work Programme.

(The meeting concluded at 7.35 pm)

This page is intentionally left blank

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF THE PLANNING POLICY COMMITTEE ON 6 OCTOBER 2021

**SUBJECT:** Budget 2022/23 Process

**REPORT AUTHOR:** Carolin Martlew, Interim Group Head for Corporate Support

**DATE:** August 2021

**EXTN:** 37568

**AREA:** Corporate Support

**EXECUTIVE SUMMARY:**

The report provides a summary of the budget process for 2022/23.

**RECOMMENDATIONS:**

The Committee is requested to:

To note the budget setting process for 2022/23

**1. BACKGROUND:**

1.1. The budget for 2022/23 will be the first to be completed under the new Committee system form of governance. The relevant budget will therefore have to be considered by each Service Committee before the full budget is considered at the Corporate Policy and Performance Committee (CPPC) on 10 February 2022 before approval by Special Council on 23 February 2022.

**2. PROPOSAL(S):**

- 2.1 The purpose of this report is to inform Members of the budget process for 2022/23.
- 2.2 Members are aware that the Council continues to face net expenditure pressures due to the unprecedented financial uncertainty over Government funding, the economy which has been compounded by the COVID-19 crisis and also Brexit. Brexit continues to cause issues, especially since the UK's official departure from the EU on 31 December 2020.
- 2.3 It is accepted that within the resource constraints there is the requirement for some resource switching to enable the Council's priorities to be progressed and to meet new statutory requirements. Budget proposals

should be for the 2022/23 year and should take account of the medium term requirement to make savings. Any growth should be minimised and met from resource switching where possible. To be considered, any proposed growth proposal must clearly state the financial commitment, whether it is recurring, how it supports the Council's corporate objectives and the objective it supports. In addition, as explained above, the resource switching must be indicated and where this is not appropriate, how the growth is to be funded.

2.4 The budget guidelines issued will run parallel with any savings initiatives that are being worked on.

2.5 It should be noted that reports that require resource switching can be considered by Committees at any time during the year. However, significant permanent resource switching requires approval by Full Council as part of the formal budget setting process.

2.6 The budget resource switching parameters for 2022/23 are:

- Growth will only be allowed in essential/priority areas
- Proposals should aim to be cost neutral
- Proposals should clearly identify any expenditure savings and Income generating ideas where appropriate.

2.7 It should be noted that reports that require resource switching can be considered by Committees at any time during the year. However, significant permanent resource switching requires approval by Full Council as part of the formal budget setting process.

2.8 The key dates for this Committee for the Budget 2022/23 process are summarised below:

Budget Consultation Report	6 October 2021
Financial Prospect Report General Fund (CPPC) – confirms budget parameters	14 October 2021
Committee Budget Report – Service specific	25 January 2022
Corporate Policy and Performance Committee	10 February 2022
Special Council	23 February 2022

2.9 It should be noted that any budget proposals should be fully costed and feasible to be delivered for inclusion in the budget for 2022/23.

2.10 A summary of the budgets managed by this Committee and the out turn for 2020/21 is shown in the Appendix for information. This Committee's controllable budget for 2021/22 is £1.080m. The figures shown for controllable expenditure and income exclude items that are for accounting purposes only.

<b>3. OPTIONS:</b>		
N/A The budget has to be set within statutory deadlines.		
<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		✓
Relevant District Ward Councillors		✓
Other groups/persons (please specify) <ul style="list-style-type: none"> <li>• Leader of the Council</li> <li>• Group Leaders</li> </ul>		✓
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial	✓	
Legal		✓
Human Rights/Equality Impact Assessment		✓
Community Safety including Section 17 of Crime & Disorder Act		✓
Sustainability	✓	
Asset Management/Property/Land	✓	
Technology		✓
Other (please explain)		✓
<b>6. IMPLICATIONS:</b>		
The budget will form the main reference point for financial decisions made in 2022/23 and the process has to comply with the Constitution.		
<b>7. REASON FOR THE DECISION:</b>		
To ensure that Members are fully informed about the budget process for 2022/23 as required by the Council's Constitution.		
<b>8. BACKGROUND PAPERS:</b>		
The budget 2022/23 Process CPPC 1 September 2021 Constitution		

Appendix

---

<b>Actual 2019-20 £'000</b>	<b>Description</b>	<b>Budget 2021-22 £'000</b>
<b>Planning Policy</b>		
972	Planning & Development Control	1,080
<b>972</b>	<b>Total for Planning Policy:</b>	<b>1,080</b>

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 6 OCTOBER 2021

#### REPORT

<b>SUBJECT:</b> Coastal Change Management Area
--

<b>REPORT AUTHOR:</b> Roger Spencer – Engineering Services Manager
--

<b>DATE:</b> August 2021
--------------------------

<b>EXTN:</b> 37812
--------------------

<b>AREA:</b> Technical Services
---------------------------------

#### EXECUTIVE SUMMARY:

Following Cabinet's approval, in October 2020, to allocate £30,000 to investigate the introduction of a Coastal Change Management Area (CCMA), the report contains a draft consultants' brief for endorsement by Members of the Committee. The intention is to examine the stages needed to be followed and potential implications when considering the introduction of a CCMA. The report will also seek endorsement of how Planning Applications for development in coastal flood and erosion risk areas should be addressed ahead of the formal consideration of introducing a CCMA.

#### RECOMMENDATIONS:

##### That Planning Policy Committee agree:

1. The outline brief for the Coastal Change Management Area (CCMA) study (as set out in 1.14 to 18 as appropriate).
2. The timing of the study be scheduled for a start of procurement beginning October 2021, in order to accommodate the outcome of the Southern Regional Flood and Coastal Committee's decision on whether to provide extra funding and consequently, the final scope of the study.
3. The Engineering Services Manager in consultation with the Planning Policy Committee Chair and Group Head of Planning, be delegated authority to proceed with the necessary administrative procedures and procurement processes based upon Southern Regional Flood and Coastal Committee's funding decision.
4. The guidance as set out in the report under 'Interim Approach' be used to assess the development merits of all Planning Applications coming forward on the Pagham Beach Estate, with reference to the plan at Appendix 1 (as a material consideration) until such time as the Planning Policy Committee decides whether to introduce a CCMA.
5. Authorise the draw-down of any further Local Levy monies granted by the Southern Regional Flood and Coastal Committee for the CCMA work.

## 1. BACKGROUND:

- 1.1. A Cabinet report in November 2020 set out the situation at Pagham Beach, where the coastline and the coastal processes are dynamic, and that the interventions required to reduce the risk to residents and property are not predictable and are not seen as sustainable.
- 1.2. Cabinet recommended, in October 2020, to allocate £30,000 to investigate the stages necessary for the introduction of a Coastal Change Management Area (CCMA); this allocation was subsequently approved by Full Council.
- 1.3. The concept of a Coastal Change Management Area was also at the core of a bid to the Department for Environment, Food and Rural Affairs (Defra) Resilience and Innovation Fund. This report was therefore delayed until the outcome of the bid was known. The bid was unsuccessful and so a secondary approach has been made to the Southern Regional Flood and Coastal Committee, seeking match funding from the Local Levy administered by the Committee.
- 1.4. Initial indications are that the Committee will support such a bid. Unfortunately, a formal decision will not be made until October this year. In order that there is no further delay, two options are presented within this report; either proceed without extra funding, or delay until the extra funding bid is decided and then proceed with a fuller scope. There is little to be lost by delaying until October 2021.
- 1.5. Whilst this report deals with the subject of the introduction of a CCMA, it should be stressed that no decision is requested at this point on whether or not to introduce a CCMA. However, it would be prudent to better understand what would be involved in the process at an early date, in order for Members to be able to make an informed decision in the future.
- 1.6. A Coastal Change Management Area (CCMA) is defined in the National Planning Policy Framework 2021 (NPPF) Glossary as:

*“an area identified in plans as likely to be affected by physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion)”*.
- 1.7. The NPPF 2021 goes on to guide Local Planning Authorities by saying:

*171. Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:*

*(a) be clear as to what development will be appropriate in such areas and in what circumstances; and*

*(b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.*

*172. Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:*

*(a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change*

- (b) the character of the coast including designations is not compromised*
- (c) the development provides wider sustainability benefits and*
- (d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast.*

1.8. Therefore, a case for introducing a CCMA can be driven by a change in Shoreline Management Plan (SMP) policy and the longer term impacts of Climate Change. This approach is supported by the material policies within the adopted Arun Local Plan 2018 (which are broadly consistent with the NPPF 2021). Specifically, Policy W DM4 'Coastal Protection' provides policy criteria for ensuring that coastal protection proposals meet other objectives and are in accordance with the SMP for the particular frontage affected.

1.9. The SMP is a high-level document that forms an important part of the Defra strategy for flood and coastal defence. It provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks in a sustainable manner with respect to people and to the developed, historic and natural environment. The SMP for this area covers the coastline from Beachy Head to Selsey Bill and has been adopted by all of the relevant operating authorities in the area.

1.10. In the first iteration of the SMP (adopted 1997) the policy for the Pagham area was for 'No Active Intervention' (at that time there was no perceived need for intervention, as the coastline self-regulated). The first review of the SMP (SMP2 – 2006) revised the Policy to 'Hold the Line'. However, in the case of Pagham, the major changes in hydrodynamics, geomorphology, beach response, etc. have occurred largely post SMP2 completion.

[NB there is an ongoing Refresh of SMP2 but the work is to bring the SMP in line with current legislation, to better define the Policy Options etc. and no changes in Policy are involved, although there exists a separate, formal Policy Change Process].

1.11. There are a range of approaches for the introduction of a CCMA, these are both temporal, spatial and in terms of scope:

Timescale immediately after the introduction, the period of a CCMA may extend up to a number of years (potentially on a sliding scale depending on scope).

Area of development limitation to:

- those areas at immediate risk at the present time
- those areas that area at greatest identified erosion or flood risk (potential)
- those areas that are at greater risk than 'normal' (i.e. other local coastal areas) potentially the whole Beach Estate and beyond, as shown at Appendix 1 for indicative purposes.

Scope of development controlled (all types of development) may be from extensions and annexes, to redevelopment, to new development.

1.12. There is also scope within the limited guidance available not only to limit future development but also to move development away i.e. relocate. However, the

approach and limited funding mechanisms for this are not at all straightforward or well understood.

1.13. The experience of other Risk Management Authorities / Local Planning Authorities has been explored (e.g. Isle of Wight, Fareham & Hayling). These areas do not have the same temporal or spatial uncertainty as Pagham but relate to where the coastline is actually retreating, through coastal land instability, or to the threat of Sea Level Rise. However, the experience of others will be utilised where applicable.

1.14. Suggested Outline Briefs:

Without SRFCC funding

- describe the various stages of work (the journey to a CCMA recommendation) and provide case studies or worked examples - this is anticipated to include:
- establishing the need for this CCMA approach (identify flood/coastal erosion/combined risk), based upon documented geomorphology of the area (historic and future projections [with confidence limits]).
- define the geographic area for implementation – this may need to be in a zoned format.
- describe potential stages of implementation with associated timescales – this may be best presented in the form of a matrix.
- advise on the most appropriate approach (see 1.11 above).
- provide recommended decision points – this may need to take the form of a decision tree.

With SRFCC funding

- 1.15. The Local Levy bid is intended to facilitate the widening of the scope of the brief, to plan a suggested methodology for community engagement and to provide transferable knowledge for the benefit of other Local Planning Authorities and Risk Management Authorities considering introducing CCMA's around the Region.
- 1.16. Therefore, the extended brief would be as above (1.14) but with the addition of the requirement for the output to identify potential methodologies and recommendations for consultation options for Pagham.
- 1.17. Further, it would include the ability to shape and apply the results of the study outputs over a wider, regional area for the benefit of others also considering the introduction of CCMA's.
- 1.18. The final brief may be refined based upon the quality portion of the successful tender.
- 1.19. Contract – to be procured based on open invitation and under a quality : price assessment.
- 1.20. Study governance – the study would be awarded by Arun DC but with scope for inviting external partner/experts to input to, and review, draft outputs.
- 1.21. Interim Approach pending a decision by Planning Policy Committee following the proposed commissioned CCMA work. In order to limit inappropriate development

that could compromise, or be compromised by the introduction of a CCMA, the national policy (NPPF2021) provides a hook that can be used as a 'material consideration' (NPPF 2021 Paras 172 & 173, as above). Specifically, Policy W DM2 'Flood Risk' provides policy criteria for ensuring that development proposals in areas at risk of flooding meet the sequential tests and other flood risk safeguards, as well as Policy W DM4 'Coastal Protection' mentioned above at 1.8, relating to coastal erosion.

1.22. It is suggested that local development criteria be applied to Pagham Beach Estate as shown delimited on the Plan at Appendix 1 as follows:-

- All new development – Not permitted
- All redevelopment (new structure[s]) – not permitted where there is significantly raised level of risk now or in predictions covering the ensuing 5 years
- All redevelopment (new structure) – only permitted where there is a) No raised level of risk now or in predictions covering the ensuing 5 years and b) no occupier density increase - finished floor levels to be at least 300mm above predicted flood levels in all cases
- Reconstruction (using substantial portions of the existing building – e.g. re-roofing or fenestration) – permitted with increased property level protection where practicable
- Non-habitable development – e.g. garages, porches, non-habitable annexes permitted where otherwise allowed – conditioned upon continuing non-habitable status
- Other risk reduction related development – permitted where otherwise allowed.

## **2. PROPOSAL(S):**

That Committee:

1. The outline brief for the Coastal Change Management Area (CCMA) study (as set out in 1.14 to 18 as appropriate).
2. The timing of the study be scheduled for a start of procurement beginning October 2021, in order to accommodate the outcome of the Southern Regional Flood and Coastal Committee's decision on whether to provide extra funding and consequently, the final scope of the study.
3. The Engineering Services Manager in consultation with the Planning Policy Committee Chair and Group Head of Planning, be delegated authority to proceed with the necessary administrative procedures and procurement processes based upon Southern Regional Flood and Coastal Committee's funding decision.
4. The guidance as set out in the report under 'Interim Approach' be used to assess the development merits of all Planning Applications coming forward on the Pagham Beach Estate, with reference to the plan at Appendix 1 (as a material consideration) until such time as the Planning Policy Committee decides whether to introduce a CCMA.

5. Authorise the draw-down of any further Local Levy monies granted by the Southern Regional Flood and Coastal Committee for the CCMA work..		
<b>3. OPTIONS:</b> <b>A</b> to appoint consultants to undertake a study with the output being a guide to the various options for the introduction of a Coastal Change Management Area or <b>B</b> Not undertake a study and consider the need for a Coastal Change Management Area at some time in the future potentially without the benefit of knowing all of the possibilities and implications <b>And then</b> 1 Await the outcome of the Southern Regional Flood and Coastal Committee's deliberations on providing extra funding to widen the scope of any study or 2 To proceed on the basis of the available funding being as set out in the November 2020 Cabinet Minute.		
<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		✓
Relevant District Ward Councillors	Notified	
Other groups/persons (please specify)		✓
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial		✓
Legal		✓
Human Rights/Equality Impact Assessment	EIA completed	
Community Safety including Section 17 of Crime & Disorder Act		✓
Sustainability	✓	
Asset Management/Property/Land	✓	
Technology		✓
Other (please explain)		✓
<b>6. IMPLICATIONS:</b> Human rights: No significant adverse impacts Sustainability: Output of study will inform evidence and justification for decisions on development sustainability in Arun in order to prevent development in inappropriate areas, and manage such development away to less vulnerable areas in order to protect coastal communities from flooding or causing flooding elsewhere; and		

Asset Management/Property/Land: The output of the study may give direction on how assets are managed into the future.

#### **7. REASON FOR THE DECISION:**

To enable the timing and scope of the outline brief and the identification and examination of the stages needed to be followed and potential implications, when considering the introduction of a CCMA.

#### **8. BACKGROUND PAPERS:**

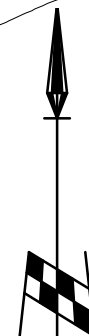
Equality Impact Assessment

Shoreline Management Plan (Beachy Head to Selsey Bill) - <https://se-coastalgroup.org.uk/shoreline-management-plans/>

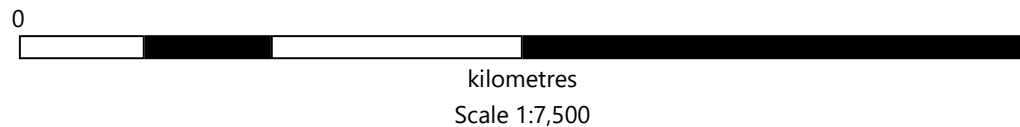
Engineering Services Annual Review 2020 - [Agenda for Cabinet on Monday 19th October 2020, 5.00 pm - Arun District Council](#) – Item 9

This page is intentionally left blank

# Appendix 1



Page 19



This page is intentionally left blank

## EQUALITY IMPACT ASSESSMENT

<b>Name of activity:</b>	Planning Policy Committee Report, seeking authority to undertake a study to investigate and advise on the options, possibilities and implications relating to the introduction of a Coastal Change Management Area (CCMA)	<b>Date Completed:</b>	24 August 2021
<b>Directorate / Division responsible for activity:</b>	<b>Place / Engineering &amp; Planning</b>	<b>Lead Officer:</b>	Roger Spencer (Engineers) is author of the Committee Report; Kevin Owen assisting as Lead Planning Officer
<b>Existing Activity</b>	<input type="checkbox"/>	<b>New / Proposed Activity</b>	<input type="checkbox"/>
		<b>Changing / Updated Activity</b>	<input checked="" type="checkbox"/>

### What are the aims / main purposes of the activity?

To enable the identification and examination of the stages needed to be followed and potential implications when considering the introduction of a CCMA.

### What are the main actions and processes involved?

Commissioning of an external Consultant's report

### Who is intended to benefit & who are the main stakeholders?

None at present – the output of the report is intended to enable Members and other stakeholders to be better informed regarding the various aspects of a CCMA

### Have you already consulted on / researched the activity?

A small number of other Planning Authorities have undertaken similar exercises but this area is unique in the uncertainty of the potential evolution of the coastline. There are therefore, some aspects of their work that can be 're-used' but it is expected that new ground will be covered. The Southern Regional Flood and Coastal Committee is to consider contributing extra funding to enable the scope to be widened, including examining consultation methodologies, for the introduction of a CCMA (the introduction is NOT covered in this report).

### Impact on people with a protected characteristic (What is the potential impact of the activity? Are the impacts high, medium or low?)

Protected characteristics / groups	Is there an impact No	If Yes, what is it and identify whether it is positive or negative
------------------------------------	--------------------------	--

<b>Age</b> (older / younger people, children)	<b>No</b>	
<b>Disability</b> (people with physical / sensory impairment or mental disability)	<b>No</b>	
<b>Gender reassignment</b> (the process of transitioning from one gender to another.)	<b>No</b>	
<b>Marriage &amp; civil partnership</b> (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognized for same-sex couples)	<b>No</b>	
<b>Pregnancy &amp; maternity</b> (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	<b>No</b>	
<b>Race</b> (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	<b>No</b>	
<b>Religion &amp; belief</b> (religious faith or other group with a recognised belief system)	<b>No</b>	
<b>Sex</b> (male / female)	<b>No</b>	
<b>Sexual orientation</b> (lesbian, gay, bisexual, heterosexual)	<b>No</b>	
Whilst <b>Socio economic</b> disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	<b>No</b>	

### What evidence has been used to assess the likely impacts?

There is nothing as far as can be reasonably considered that reacts positively or negatively to a study to investigate and advise on the options, possibilities and implications relating to the introduction of a Coastal Change Management Area (CCMA). Any subsequent consideration of the introduction of a CCMA should take account of any and all equalities issues.

### Decision following initial assessment

Continue with existing or introduce new / planned activity	Yes	Amend activity based on identified actions	No
--	-----	--	----

### Action Plan

Impact identified	Action required	Lead Officer	Deadline
None	None		

### Monitoring & Review

Date of last review or Impact Assessment:	N/A
Date of next 12 month review:	N/A
Date of next 3 year Impact Assessment (from the date of this EIA):	N/A

Date EIA completed:	24 August 2021
Signed by Person Completing:	R Spencer – Engineering Services Manager

This page is intentionally left blank

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 6 OCTOBER 2021

#### REPORT

<b>SUBJECT: Infrastructure Funding Statement (IFS) 2020/21</b>
--

<b>REPORT AUTHOR:</b>	Kevin Owen, Planning Policy Team Leader
<b>DATE:</b>	September 2021
<b>EXTN:</b>	x 37853
<b>AREA:</b>	Planning

#### EXECUTIVE SUMMARY:

The Community Infrastructure Levy (CIL) Regulations 2010 (as amended) include a requirement for all planning obligation collecting authorities to prepare an annual Infrastructure Funding Statement (IFS) to be published on the council's web site at the end of the calendar year; reporting planning obligation income and expenditure from the previous financial year.

This report summarises the factual update to the Arun District IFS which is available as Background Paper 1.

#### RECOMMENDATIONS:

That Planning Policy Committee: -

Agrees the Arun Infrastructure Funding Statement 2020/21 and that it is published on the ADC website in accordance with Regulation 121A of the Community Infrastructure Regulations 2010 (as amended).

#### 1. BACKGROUND:

1.1 The Council first published an Infrastructure Funding Statement (IFS 2019/20) last year and has now prepared a further factual update to the IFS (2020/21). The IFS must be published annually, on the Council's web site i.e. by 31 December 2021. The Community Infrastructure Levy (CIL) Regulations 2010 (as amended) requires the IFS to set out:-

- A statement of the infrastructure projects or types of infrastructure which the charging authority will be or may be or partly funded by CIL;
- A report about CIL in relation to the previous financial year;
- A report about planning obligations in relation to the reported year.

- 1.2 The publication of the IFS helps to ensure developer contributions are fully transparent and how they are to be used and ensures that this is set out in an accessible standard digital format.

**IFS Headline Figures:**

- 1.3 As mentioned above, the IFS must report on the Council's infrastructure list (what it intends to spend CIL on) including reporting on CIL and S.106 income and expenditure. It is important to note that not all receipts held are spent or allocated in any given reporting year because of the status of the infrastructure project (e.g. whether a project is sufficiently funded or progressed to justify handing over funds).
- 1.4 It is also important to note that when reviewing the Arun IFS, that it should be read together with the WSCC IFS to get a complete picture of infrastructure delivery in the district. The County Council IFS will be made available on this page of the website:  
<https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/section-106-planning-obligations/#infrastructure-funding-statement>
- 1.5 S.106 and CIL receipts play a critical role in supporting growth in the district, and delivering the aims and objectives and housing growth (20,000 dwellings) set out in the Arun Local Plan (ALP), supported by the infrastructure mitigations set out in the supporting Infrastructure Capacity Study Delivery Plan 2017:-
- £215 million in S.106 would be required to support and mitigate the delivery of eleven strategic housing allocations in the district;
  - an estimated £30 million in CIL may be able to contribute towards meeting additional infrastructure requirements, to support the development of the area.
- 1.6 Progress is being made on the delivery of the strategic housing allocations, in terms of planning permission and the receipt of masterplans for the largest sites such that (figures are rounded):-
- **£1.5m** was received in total in Arun from S106 and CIL Developer Contributions combined in the year 2020-21; of which
  - **£1.4m** was received from S.106 developer contributions;
  - **£98.6k** was received from CIL liable applications (No expenditure took place in 2020/21 - CIL spend priority is subject to the preparation of a 3-year Infrastructure Investment Plan IIP currently in preparation);
  - **96 x CIL** liability notices (approximately) have been issued since 2020;
  - **£1.24m** total CIL relief granted;
  - **£12.5m** S.106 was held on deposit as at March 2021 (the budget monitoring report);
  - **£622k** in total was spent in 2020/21 or transferred towards projects (further details on the year's activity will be found under sections 7 - 9 of the IFS document;
  - There is likely to have been a downward impact of the Covid-19 pandemic on delivery activity for infrastructure projects in 2020/21 because of social distancing requirements although planning application activity has been fairly

robust for CIL receipts ;

### **S.106 INCOME**

1.7 The Arun IFS is provided in Background Paper 1 and is supported by a number of appendices that provide all the data to support the headline figures (rounded) summarised below:-

- **£566.2k** is due to be received by the Council once triggers are reached, after entering into S.106 agreements as part of the approval of approximately 15 planning applications on development sites;
- **£11m** received from all planning obligations, entered into on or prior to 1st April 2021, has not been formally allocated;
- **£672k** total amount of money (received under planning obligations) which was allocated but not spent in 2020-21 totals
- **76** affordable housing units on site and **5** new areas of open space and play areas will be delivered in the reported year via the Council entering into planning agreements;
- **127** affordable homes were provided and at least **2** areas of open space and play areas;
- Further details on non-monetary contributions are set out in section 8 of the IFS.

### **S.106 EXPENDITURE**

- **£622k** was spent in 2020/21 or transferred to infrastructure projects including an 'Artsworld' project for Angmering, implementing the actions from the Rustington Village Retail Report, further funding towards the 60-unit extra care housing scheme in Westergate known as Monaveen and mitigation at Pagham Harbour
- **£59.5k** of the above amount was spent on repaying money borrowed for the Littlehampton Wave.

### **CONCLUSIONS**

1.8 The Arun IFS provides a comprehensive overview of CIL and S.106 income and expenditure within the district and how it has or will be spent on specifically defined projects related to the specific planning obligation, and that benefit the local community through mitigating the development. The appendices, which accompany the IFS provide further detail. However, for a full picture the the Arun IFS, that it should be read together with the WSCC IFS.

## **2. PROPOSAL(S):**

2.1 That the Planning Policy Committee agrees the Arun IFS (2020/21) and that it is published on the Arun District Council website.

## **3. OPTIONS:**

3.1 That the Arun IFS (2020/21) is agree and published or not agreed and published.

<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		X
Relevant District Ward Councillors		X
Other groups/persons (please specify)		X
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial		X
Legal		X
Human Rights/Equality Impact Assessment		X
Community Safety including Section 17 of Crime & Disorder Act		X
Sustainability		X
Asset Management/Property/Land		X
Technology		X
Other (please explain)		X
<b>6. IMPLICATIONS:</b>		
6.1 This is a factual update on the 2020 IFS position based on receipt of CIL and s.106 monies using the Council's monitoring systems.		

<b>7. REASON FOR THE DECISION:</b>
7.1 It is a legal requirement, under the CIL Regulations 2010 (as amended) to prepare the IFS before 31 December 2021.

<b>8. BACKGROUND PAPERS:</b>
Background Paper 1: Arun Infrastructure Funding Statement 2020/21
<a href="https://www.arun.gov.uk/download.cfm?doc=docm93jjjm4n15865.pdf&amp;ver=16370">https://www.arun.gov.uk/download.cfm?doc=docm93jjjm4n15865.pdf&amp;ver=16370</a>
This document, and all appendices will be available on the Arun District Council's webpage: <a href="https://www.arun.gov.uk/ifs-and-developer-contributions">https://www.arun.gov.uk/ifs-and-developer-contributions</a>

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 6 OCTOBER 2021

#### REPORT

<b>SUBJECT:</b> Arun Local Plan Update
--

<b>REPORT AUTHOR:</b>	Kevin Owen, Planning Policy Team Leader
<b>DATE:</b>	21 June 2021
<b>EXTN:</b>	x 37853
<b>AREA:</b>	Planning

#### EXECUTIVE SUMMARY:

This report updates members on the issues affecting the progress of the Local Plan update and progressing a Vision and Objectives while anticipating significant Government planning and regulatory reforms. There are consequently, a number of options members may wish to consider on the approach to take for the Local Plan update and supporting evidence work, in view of the pending national planning reforms and also emergent critical issues arising under the 'Duty To Cooperate' affecting plan making and particularly delivery of development to the West of Arun in the A27 corridor.

Following discussion and decision, there will need to be consequent further reports to the next meeting on an update to and adoption of the Local Development Scheme (LDS) which is the Council's formal plan making timetable and the approach to updating the Council's Statement of Community Involvement (SCI which sets out how Arun communities will be consulted (and both documents published on the Council's web site).

#### RECOMMENDATIONS:

That the Planning Policy Sub Committee recommends to Full Council one of options 1 to 3 below plus recommendation 4. Officers would recommend Option 1.

1. Option 1 - Continue with Full Plan Preparation as per previous resolutions.
2. Option 2 - Continue with Full Plan Preparation but with an Extended Timescale; or
3. Option 3 - Pause the preparation of a revised Local Plan until details of the new plan making system are agreed; and
4. That the LDS and SCI be reported back to the next meeting.

## **1. BACKGROUND:**

- 1.1 The Planning Policy Sub-Committee (PPSC) on 23 February considered but did not agree a Vision and Objectives with which to steer the work on the Local Plan update, pending undertaking further work and discussion. In June Planning Policy Committee agreed that early engagement work could start on a list of Development Management policies.
- 1.2 A further progress report on the Local Plan Update is therefore necessary for this meeting - given the slippage in the timetable and need to consider a number of matters arising that are likely to have a material impact on the Council's approach to the Local Plan update.

### **Planning Reform**

- 1.3 The Government signalled significant planning reforms last year in the 'Planning for the Future' consultation (6 August 2020) and in May 2021 indicated it is pushing forward on the Planning Bill (Queens' Speech 11 May 2021) which may be voted on in Parliament at the end of the summer. The reforms propose to fundamentally change the way plans are made, their format, scope and content being based on zoning all land (i.e. as either growth, renewal or protection areas), a 'top down' housing target (based on the Standard Housing Methodology) a raft of national development management policy standards (no longer to be locally derived), together with a national infrastructure levy. Should the reforms be enacted, they will also require secondary legislation. Transitional arrangements are considered as part of the reforms in order to protect progress on plans that achieve certain milestones (e.g. Regulation 19 publication or submission stage) ensuring a smooth transition and that existing permissions and any associated planning obligations can continue to be implemented as intended. However, the timescale for this is yet to be clarified but is anticipated reforms may be in place in 2024/25.
- 1.4 There has already been significant delay on the Arun Local Plan update timetable set out in the adopted Local Development Scheme (July 2020) which schedules the submission stage in summer 2023 when there is at least a 12-month slippage. Much of this delay relates to the Council not yet agreeing to the Vision & Objectives. Therefore, there is a significant risk that planning reforms will impact significantly on the Arun Local Plan update and miss any transitional safeguards. This scenario could result in abortive costs and need to comprehensively redo work under the new arrangements. The cost of preparing the Local Plan update is significant, involving the commissioning of evidence, public consultation and preparation stages including the Local Plan examination.
- 1.5 Given the significant risks and challenges going forward, it is an appropriate time to consider options for a more flexible approach to the update of the Arun Local Plan. This may realise efficiencies in resource use and help to minimise risks (e.g. scope for rationalising evidence commissioning costs and preparation stages over the next 18 months).
- 1.6 A budget has already been approved for the Local Plan update and a number of studies have been commissioned and are in the pipeline.

### **Commissioned Studies**

- Arun Active Travel Study (Phase 1 complete)
- Arun Arun Transport Model (A259 – District Wide) (underway)
- Arun Tourism & Visitor Accommodation Study (inception/early evidence gathering)
- Biodiversity Net Gain study (inception/early evidence gathering)
- Masterplanning
- Climate Change/Sustainable Design Study (currently being put to 'Invitation To Tender')

### **Pending Studies**

- Sustainability Appraisal/SEA/HRA (including early scoping Objectives)
- Placemaking Study (20 minute communities)
- Housing Economic Development Needs Assessment (HEDNA) Study
- Arun Transport model Phase 2
- Strategic Flood Risk Assessment (SFRA)
- Active Travel Study Phase 2
- Retail Study
- Landscape Study
- Green Infrastructure Study
- Heritage and Conservation Area studies
- Infrastructure Development Plan
- Viability Study

### **Local plan Update Options**

- 1.7 The total budget of circa £830k for the Local Plan update includes £145.6k currently committed up to this year (2021/22) and further £30k imminently to be commissioned this year (i.e. Climate Change - Sustainable Design) totalling circa £175.6.
- 1.8 The Pending Studies above therefore, account for £654.6k uncommitted spend. Officers propose that there are consequently, three broad options that members may wish to consider based on the potential benefits and risks which are summarised below (but further amplified in Appendix 1: Table 1):-

#### **Option 1 Full Plan Preparation (12-month slippage)**

1. Full Plan preparation which would entail committing the full £830k budget to plan evidence commissioning, consultation, submission, and examination through to adoption under the current planning system. However, based on the current timetable slippage (including that the plan Vision and Objectives still need member agreement) at the earliest, publication and submission may be possible by summer/autumn 2024. The main risks would be abandonment of the Local Plan, wasted expenditure and having to start again with a similar budget, should transitional arrangements be missed due to any further slippage:-
- 2021/22=£80.6k
  - 2022/23=£282k
  - 2023/24=£292k

### **Option 2 Full Plan Preparation Extended Timescale (24 months)**

2. Full plan preparation by committing the full £830k budget but over an extended revised timetable. This approach may provide room for flexibility to amend the format of the Local Plan and spend profile (if feasible) to accommodate the new planning system. However, there remain significant risks in terms of the prolonged plan making timetable, the shelf life of the commissioned evidence studies, the need to top up or significantly fix studies already programmed and this approach may still be subject to additional contingent budget growth to implement the new planning reforms and new evidence requirements:-

- 2021/22=£80.6k
- 2022/23=£0k
- 2023/24= £0k
- 2024/25= £282k + Unknown
- 2025/26= £292k + Unknown

### **Option 3 Pause Plan Making**

3. Pause plan making at the current committed studies circa £175.6k of the budget (paragraph 1.7 above). This would result in an underspend of £654.6k allocated to the Pending Studies which would not be progressed. The underspend could be a potential saving in the short to intermediate term. The evidence already commissioned would still need to be progressed and could potentially help to form the basis for a resumption of plan making activity in 2023/24 focussing on the new planning system together with delivering the Council's current priorities e.g. the challenges arising from the Climate Change Emergency; carbon reduction; post Covid-19 regeneration; transport and water quality infrastructure including flood risk; and implementing 'Biodiversity Net Gain'. The resumption of plan making in 2023/24 can recast the budget and timetable at that time to fit the new plan making requirements:-

- 2021/22=£0k
- 2022/23=£0k
- 2023/24=£Unknown

1.9 There are advantages and disadvantages with each of the options as set out in Appendix 1: Table 1. Members will need to weigh up the need for speedy plan making progress to enable sustainable local decision making with that of demonstrating prudent use of public resources. Not least, that a plan is fit for purpose and future proof if subjected to further slippage, and any new plan making requirements. Officers recommend continuing with the current plan update because of national policy expectations on making plan progress although it is recognised that this now entails significant risks because of the existing and likely slippage. Members are also advised that whichever option is preferred, there will be a need to ensure that other background work is progressed alongside the committed evidence studies. For example, high level topic papers will be needed to scope the strategic issues and options that should be addressed as part of normal plan making but also emergent issues arising under the 'Duty to Cooperate'. This will also steer any subsequent evidence commissioning when plan making resumes, including evidence needed based on the requirements of the new planning system. Some of this work could clearly entail a call on budget provision, impacting on any assumed £654.6k underspend under option 3.

## Commissioned Evidence Base

- 1.10 There are long lead times between evidence commissioning, preparation, and study outputs. The commissioned evidence studies listed in paragraph 1.6 above, will continue as they will best reflect the Council's priorities including the declared 'Climate Change Emergency' (January 2020) and help deliver momentum on addressing carbon reduction and energy efficiency (e.g. Climate Change and Sustainable Design study), including enabling work on the need for post Covid-19 economic regeneration (e.g. Tourism and Visitor Accommodation Study). In addition, this work will support local implementation (e.g. developing an Arun Biodiversity Action Plan) of national measures being introduced this year to protect and enhance biodiversity through a Biodiversity Net Gain metric which will need a significant amount of local data capture on habitats and species.
- 1.11 The A259 Corridor – Arun Transport Model Study has already been commissioned jointly with West Sussex County Council. This work will evidence the A259 corridor improvements as well as establish a District-wide Arun Transport Model (ATM). The ATM can be used for testing development scenarios for the Local Plan update. Under options 2 and 3 the scenario testing phase (and costs) will be put on hold, pending the resumption of the Local Plan Update.
- 1.12 Similarly, the Arun Active Travel Study (ATS) Phase 1 has been completed and was agreed as a material consideration at the PPC meeting of 1 June 2021. Phase 2 of the study (and costs) to test local plan development scenarios, will be put on hold under options 2 and 3 pending the resumption of the Local Plan Update.

## Topic Papers

- 1.13 There will be a need to prepare Topic Papers as part of scoping the Issues and Options for any local plan update. These would cover the main key topics – for example (this list is non-exhaustive):-
- **Standard Housing Methodology** - components of population and household change - demographics of an ageing population etc.
  - **Affordable Housing** - average incomes and house prices ratio
  - **Economy and Employment Land:** - post covid recovery, role of employment land and new 'E use class' and 'green economy'
  - **Transport:** - Modal shift, Electrical Vehicles, Road Infrastructure
  - **WasteWater Capacity and water quality and efficiency:** to serve development while ensuring discharge consents and pollution meet standards and avoid harm to aquatic habitats
  - **Greenspace and Leisure and Health and Wellbeing:** There is increasing emphasis on the importance of and need to integrate Health and Wellbeing objectives within place making at the local and national level, through plan making and decision making. West Sussex County Council and Public Health England issued recent guidance on this in 2020 (Background Paper 2).
  - **Housing Market Absorption Study:** Similar to work published by Horsham District Council (i.e. Housing Delivery Study), examining the ability of the local housing market to sustain high levels of housebuilding and the downward effect on house prices (in terms of supply and demand) and willingness of developers to

build out consents as profit margins are squeezed, impacting on local housing delivery and performance. Such evidence can be used to shape housing trajectories and housing target numbers that can be realistically accommodated by the market in an emerging Local Plan.

1.14 In addition through consultations on emerging plans in neighbouring authorities and under the 'Duty to Cooperate', a number of other critical issues are being identified that have implications that may equally apply in Arun District – particularly affecting the West of the district. These matters will need to be addressed in updating the Local Plan and may pose similar soundness and timetable implications for Arun - whichever option is chosen. These are described below and will form the basis for Topic Papers aimed at scoping high level issues from existing evidence (but also identify whether additional evidence may need commissioning):-

- **A27 Infrastructure Improvements – Capacity and Viability:** Chichester District Council (CDC) consulted on their Regulation 18 Local Plan (Preferred Approach) in 2018. CDC have since, been progressing further evidence work to support the 'preferred approach' with a view to publishing their Local Plan (Regulation 19) at the end of 2021. In particular, under the 'Duty to Cooperate', liaising with Highways England, transport consultants and other stakeholders, CDC have been working on an A27 mitigation scheme. The cost would be upwards of £65m and the full mitigation package is currently unviable without public sector funding. CDC have looked at securing external funding from a number of sources and so far have been unsuccessful, with no anticipated funding accessible before the plan is submitted. These A27 improvements are critical to delivering CDC's proposed spatial development strategy, housing numbers and strategic housing allocations around Chichester. A special meeting of CDC members (Background paper 1) considered a report on this issue (29 July 2021). The report identified that unless external funding was secured, the required A27 improvements would be unviable and therefore undeliverable. The implications being that the housing numbers could not be supported and potentially a lower number may be included in the plan. This figure could be reviewed in 5 years should a national scheme of A27 improvements materialise. The CDC Regulation 18 Local Plan (Preferred Approach) in 2018 factored in Arun's adopted Local Plan Strategic Allocations material to their transport modelling work and the necessary A27 improvements (e.g. mitigations identified within the Arun Transport Study and Arun Infrastructure Capacity Study Development Plan). The implications of CDC's recent work on the viability of A27 junction improvements is not yet fully understood for Arun. For example, does this work raise similar A27 junction improvement viability and deliverability issues for Arun's existing strategic allocations around the Bognor Regis, Bersted and Barnham areas which share and connect to the A27 in the West of the district, particularly if CDC plan for lower housing numbers. This will also need to be understood for the Local Plan update because of the particular impact on development and infrastructure capacity, on the west side of Arun.
- **Water Quality Standards:** CDC have had further extensive engagement with Southern Water and the Environment Agency on waste water infrastructure capacity because of the impact of pollutants such as nitrates from housing developments discharging waste water which enters Chichester Harbour (e.g

the risk of Eutrophication adversely affecting aquatic plants and species). These discussions (Background paper 1) have concluded that while engineering solutions exist and are feasible to accommodate future housing growth “environmental limitations are a constraint particularly in the western part of the plan area”. While a ‘Statement of Common Ground’ is being progressed, Southern Water have been unable to clarify how or when Waste Water Treatment Works can be upgraded or provided with the necessary infrastructure to support the CDC Local Plan, leading to significant uncertainty on housing delivery and plan formulation. Southern Water will not conclude this work until consultation and adoption of a District Water Management Plan (DWMP) in 2023. Arun has similar, potential issues that may arise with respect to Pagham Harbour which may affect developments within Chichester and Arun District that need to connect to the Waste Water Treatment Works discharging to that area.

### **Local Development Scheme**

- 1.15 Which ever option is preferred, there will be a consequent need to update the Council’s Local Development Scheme (LDS) adopted in July 2020. The LDS sets out the Councils’ plan making timetable and needs to be kept up to date because it is subject to Local Plan examination and is monitored by the Planning Inspectorate, developers, and the local communities within Arun. A revised LDS based on the Committees decision, can be brought to the 30 November meeting and for subsequent adoption by Full Council on 12 January 2022.

### **Statement of Community Involvement**

- 1.16 The Statement of Community Involvement (SCI) 2018 (adopted by Full Council in January 2019) sets out how the Council consults residents, businesses, and organisations in Arun, can help to shape plan making and decision making. The SCI must be prepared in accordance with the plan making regulations (Town and Country Planning (Local Planning) (England) Regulations 2012) and needs to be kept up to date (also being subject to the examination of the plan).
- 1.17 Whichever option is selected as the preferred option by members, a further report will be presented to the next meeting on the appropriate approach to an SCI update.

## **2. PROPOSAL(S):**

To agree on a preferred option for taking forward plan making and the prudent allocation of public finance for Local Plan evidence preparation and commissioning; agree that subject to the preferred option chosen, the LDS timetable will be updated and brought to the next meeting prior to adoption at Full Council in January 2022; should option 1 or 2 be chosen a further report will be made to the next meeting to update the SCI.

The following options are available to Members:

1. To agree the report;
2. Not to agree the report.

<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify)		x
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial	x	
Legal	x	
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability	x	
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>  The options all have advantages and disadvantages as describe in the report section 1.7 - 1.9 and Appendix 1: Table 1. Each option involves rescheduling the plan making timetable which will make best use of public finances and benefit from commissioned studies and proposed topic papers. This will also aid local decision making and ensure that development is sustainable and meets the Council's aspirations, including securing the steps necessary to address the Climate Change Emergency. The commissioning of evidence has a financial impact on the authority however, this has been budgeted for.		

<b>7. REASON FOR THE DECISION:</b>  To ensure that ensure the Local Plan update is fit for purpose, uses resources and finances, efficiently and ensures that progress can be maintained on delivering the adopted Arun Local Plan.
---

<b>8. BACKGROUND PAPERS:</b>  Backround paper 1: Chichester District Council All Member Session Thursday 29 July 2021 <a href="https://chichester.moderngov.co.uk/documents/b5230/Public%20Question%20and%20Answer%20Sheet%20-%20All%20Member%20Session%20-%2029%20July%202021%20Thursday%2029-Jul-2021%2009.30%20AI.pdf?T=9">https://chichester.moderngov.co.uk/documents/b5230/Public%20Question%20and%20Answer%20Sheet%20-%20All%20Member%20Session%20-%2029%20July%202021%20Thursday%2029-Jul-2021%2009.30%20AI.pdf?T=9</a>
--

Background paper 2: WSCC and Public Health England: Creating Healthy Places - a public health and sustainability framework for West Sussex  
<https://westsussex.moderngov.co.uk/documents/s21906/Agenda%20Item%209%20-%20Appendix.pdf>

## Appendix 1: Table 1 Local Plan Options Comparison

<b>Option 1: Full Plan Preparation (12-month slippage)</b>		
<b>Considerations</b>	<b>Advantages</b>	<b>Disadvantages</b>
<b>Budget</b>	<b>Allocated</b>	<b>May need to re-start plan making from beginning and allocate new plan making budget as no scope to fix the plan</b>
<b>Evidence Work</b>	<b>Commenced and programmed</b>	
<b>Flexibility</b>		<b>No. Timetable needs urgent updating - at least 12 months slippage – no guarantee on agreeing Vision and Objectives quickly</b>
<b>Future proof</b>		<b>No - based on the current planning system</b>
<b>National Policy</b>	<b>Meets Government policy expectations on maintaining progress on plan making</b>	<b>Substantial risk that the Plan will not achieve Reg 19 Publication consultation or Submission by transitional period and therefore, not meet the requirements of the signalled new planning system</b>
<b>Local decision making</b>	<b>Planning positively to try to address housing land supply</b>	<b>'Soundness' issues should the plan be overtaken by the new planning system requirements and examination be unable to fix the plan</b>
<b>Neighbourhood Development Plan</b>	<b>Provides a framework for NDP reviews/update</b>	<b>Risk to NDP preparation including abortive costs if slippage and plan is abandoned</b>
<b>Option 2 Full Plan Preparation Extended Timescale (24 months)</b>		
<b>Budget</b>	<b>Allocated</b>	<b>However, likely to require additional budget to correct evidence and/or the format of the Local Plan under the new planning system because of existing and 24-month slippage</b>
<b>Evidence Work</b>	<b>Commenced but more flexibility on timing of spend</b>	<b>Large scale expensive studies with long lead times, may no longer be fit for purpose with significant timetable delay 24 months+ 2 Risks to ability to fix evidence. Additional evidence likely to be needed under the new planning system</b>
<b>Flexibility</b>	<b>Yes some work may be slowed or paused</b>	<b>As above.</b>
<b>Future proof</b>	<b>Potentially</b>	<b>Depends on degree of slippage and how far existing technical studies can be topped up or fixed</b>
<b>National Policy</b>	<b>Maintains some progress on plan making meeting government policy expectations and also</b>	<b>Does not meet Government policy for timely progress on plan making. Need to amend plan format risks</b>

	potentially the new plan making requirements	further delay plan adoption for decision making (including risk of intervention through Secretary of State default powers)
Local decision making	Maintaining some progress on positively addressing housing land supply	Delayed plan adoption would lead to uncertainty for decision making and significant reliance on Interim Housing Statement and HELAA
Neighbourhood Development Plan	NDP reviews work to adopted Arun Local Plan and Standard Housing Methodology	Greater evidence burden on NDP preparation and uncertainty on strategic matters with delayed Local Plan update, may risk to NDP preparation including additional evidence costs
<b>Option 3 Pause Plan Making</b>		
Budget	Minimum committed spend. Underspend potential budget saving and efficient use of public finance/resources in the short and intermediate term as low risk of abortive work	New plan making system likely to require additional plan making budget at the appropriate time. Topic papers may generate need for evidence commissioning against budget underspend
Evidence Work	Committed evidence may serve earlier resumption of plan making and help to deliver Council priorities	
Flexibility	Flexibility to accommodate new plan making system	Some slippage
Future Proof	Yes – update commence in 2023 based on delivering a new format plan and evidence under the new planning system and as an integrated update (i.e. avoids two separate processes for strategic and DM policies updates)	Potential reputational damage through pausing plan making when unable to demonstrate a 5-year housing land supply (but faster resumption of plan making and fit for purpose)
National Policy	Prudent use of resources – faster resumption of plan making – fit for purpose under new planning system	Does not meet Government policy for timely progress on plan making (including risk of intervention through Secretary of State default powers)
Local decision making	Facilitates early resumption of plan making	Slippage not positively addressing housing land supply and reliance on Interim Housing Statement and HELAA in the short term
Neighbourhood Development Plan	NDP reviews work to adopted Arun Local Plan and Standard Housing Methodology – although, earlier resumption of Plan making likely to assist strategic matters	Greater evidence burden on NDP preparation and uncertainty on strategic matters in the short term

This page is intentionally left blank

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 6 OCTOBER 2021

#### REPORT

**SUBJECT: Development Management Policies Engagement Feedback**

**REPORT AUTHOR:** Kevin Owen, Planning Policy Team Leader  
**DATE:** 2 September 2021  
**EXTN:** x 37853  
**AREA:** Planning

#### EXECUTIVE SUMMARY:

Following the meeting in June, Planning Policy Committee agreed early engagement work could commence on the draft list of Development Management Policies identified for potential review. This report provides an update on that engagement work.

#### RECOMMENDATIONS:

That Planning Policy Committee: -

Considers the feedback received and agrees the report be used to inform future plan making.

#### 1. BACKGROUND:

- 1.1 The Planning policy Committee meeting in June considered and agreed a list of Development Management (DM) policies that should be reviewed and used for early engagement with key stakeholders. This early engagement would then be followed by a Regulation 18 public consultation Issues & Options document of DM policies proposed for review, at the end of the year.
- 1.2 The Parish Councils and the following organisations have been sent the draft list of DM policies (31 August) for comment, seeking a high level response regarding the Council's approach at this stage on the identified DM policies, although welcoming any specific and detailed responses.
  - Parish & Town Councils
  - Homes England
  - Natural England
  - Historic England
  - Environment Agency
  - Highways England
  - Southern Water
  - Portsmouth Water

- West Sussex County Council
- Chichester District Council
- Adur & Worthing Councils
- Horsham District Council
- Crawley Borough Council
- South Downs National Park Authority

1.3 The consultation period closed 16 September with a Parish/Town Council workshop for those unable to submit a written response or those seeking further clarification. Comments received via the workshop and separate email responses are summarised below:-

#### **Parish Town/Councils workshop and email responses**

- Climate change - flooding – a longer term perspective is needed v's shorter term rolling forward only 5 years – e.g. in Clymping the 100-year flooding event occurred in 2019 - how is this to be accommodated in a plan update?
- The need for DM decisions to reflect the Council's climate change emergency priorities e.g. recent permissions of Local fast-food outlets - car based in developments;
- Green networks/corridors - requiring developers do undertake phase 1 habitat studies now - in order to implement biodiversity net gain but also critically, to protect existing trees, habitats and wildlife that exist;
- Relevant strategic policies set an important context and need to be included i.e. Policy ECC SP1 Adapting to Climate Change and flooding is critical to addressing impacts of climate change and needs strengthening e.g. tightening up against building on floodplains and on the coastal plain;
- Any development of cultivated and uncultivated land will impact on drainage characteristics and fundamentally change the character of the landscape within Arun;
- Policy ECC SP2 Energy and climate change is not ambitious enough and should look to exceeding national zero carbon 2050 targets – in particular, providing the framework for policy ECC DM1 Renewable Energy i.e. 10% on site renewable energy is too low;
- Why can't stronger energy performance be applied now for the energy performance of new buildings?
- The Climate Change Emergency must be an important consideration - the focus should be on addressing flooding, sewage and traffic concerns arising because of proposed development;
- In terms of design standards, solar panels should be required on new development along with heat pumps and a greater focus on efforts towards carbon neutrality;
- Whilst DM design policies are important for carbon reduction, the policies protecting of green spaces, heritage assets, village/rural character, landscapes, farmland, gaps between settlements all play a role in tackling climate change e.g. locally accessible facilities/services, healthy lifestyles, quality of life, conservation and enhancement of natural and built environment can help reduce waste and carbon and enhance the lifetime of built development;
- Allied to above - important that Conservation Area reviews and appraisals are updated including locally listed assets;
- Other strategic policies may need to be looked at – e.g. SP SD3 Strategic Gaps and criterion e);

- Protection of the landscape, biodiversity and gaps between settlements to maintain character of coastal plain;
- Changes to policies D DM4 (Extensions) or Permitted Development may benefit from a update;
- Need to engage public more about how climate change may affect them;
- Planning reforms suggest ADC Local Plan update will be required;
- There is currently no assessment of the Carbon Footprint associated with Housing applications / development (either construction or lifetime use) or any offsetting measures;
- The concept of Net Biodiversity Gain is being established but indications are already that it is risks being subject to considerable abuse by developers;
- Arun needs to appoint their own Ecologist to get bespoke advice;
- The issue of access to affordable housing of the right size and mix in local communities including mobility between single and larger occupancy houses should also be addressed.

### **West Sussex County Council (WSCC)**

- WSCC submitted general and specific points and in summary, welcomed the policy focus (and shared the concern) on the need for tackling climate change; including the respective importance of each authority's role in the Sussex Nature Partnership Local Authority Network (i.e. via biodiversity net gain and a Natural Capital Investment Plan)
- The important role of TEL DM1 Telecommunications and digital infrastructure;
- The role of H DM1 Housing Mix: 'extra care' and "older people" including policy H DM2 Independent living and care homes;
- ECC SP1 Adapting to Climate Change: should examine the role of green infrastructure in addition to the GI Network towards flood avoidance and management together with policies for W DM1 Coastal Protection and W DM2 Flood Risk e.g. criterion a – should refer to ... all forms of flood risk ...
- W DM3 Sustainable Urban Drainage Systems (SuDS): an opportunity to refer to 'green walls' as well as 'green roofs' which have biodiversity benefits, as well as amenity value; suggest add a criterion k: to take account of the 1 in 100 year storm event plus 40% allowance, on stored volumes, to ensure that there is no flooding of properties or the public highway or inundation of the foul sewerage system; any excess flows must be contained within the site boundary, and within designated storage areas.
- Updated references required - to refer to 'West Sussex Joint Minerals Local Plan, July 2018 (Partial Review March 2021); recent soft sand review; Safeguarding Guidance is no longer in draft form and now covers waste too ('West Sussex Minerals and Waste Safeguarding Guidance').

### **Local authorities**

- Horsham District Council - a sensible approach appears to be being undertaken to update policies relating to climate change and design; the scope and priorities will depend on the circumstances of Arun tempered by reforms to national planning policy and the emerging new Environment Act; Horsham will continue to work with ADC under the duty to cooperate on signing off a Statement of Common Ground to progress respective plan making.
- Adur & Worthing Councils – Thanked ADC for the opportunity to comment; support the direction that ADC is taking in responding to the Climate

Emergency declaration; the emerging Worthing Local is seeking to deliver similar outcomes and through the Examination will feed back intelligence; need to ensure the update reflects recent policy changes e.g. Use Class E, Biodiversity Net Gain, National Model Design Code / Guide, increased focus on all sources of flooding, future homes standard etc.

- South Downs National Park Authority - submitted general and specific points and in summary - support ADC's approach and suggest updating policy DM1 'Aspects of form and design quality') that facilitate the adaption of the built environment and new development to cope with the effects of climate change – will making a greater contribution; agree sensible to include the two strategic policies on adaption and mitigation in relation to climate change; suggest also prioritising policies relating to biodiversity and green infrastructure in support of 'nature based solutions' to address both the Climate Change Emergency and nature recovery; recent changes to the NPPF 2021 in particular, regarding protecting national parks and their setting, should be a priority e.g. for updating Policy LAN DM1 Protection of Landscape Character; priorities should also include water policies DM1, DM2, DM4 flood risk where likely to need significant adaptation and mitigation for the predicted effects of climate change; also the need to make appropriate reference and have regard to SDNP updated 'Landscape Character Assessment' work/evidence and guidance for 'Nature networks' and 'Natural Capital Investment', 'Trees Planning and Development'.,

### **Environment Agency (EA)**

- Generally supportive of ADC's approach, welcome updates to DM policies that relate to the environment and in particular to ENV DM5 regarding Biodiversity Net Gain, W DM1 Water Supply and Quality and W DM2 highlighting natural flood management;
- To be aware of the recent updates regarding climate change allowances for peak river flows (response included references and resources, links and further briefing note);
- On 20th July 2021 'Flood risk assessments: climate change allowances' was updated in line with the latest climate change projections and research on flooding from rivers. The main changes include:
- Change to how peak river flow allowances are provided, by river basin district to a smaller geography called management catchments, so that allowances better reflect variability in how different catchments will respond to the impact of climate change;
- Application of 'peak river flow' allowances has also changed, focusing more on use of the central allowance - reflecting variability within catchments means allowances may be lower or higher than the current allowances in some places and focus on the central allowance will ameliorate the impact where updated allowances are higher than the previous allowances;
- Latest climate science and research shows peak river flows could more than double by 2100 in some locations and by ensuring EA guidance is premised on the latest climate change projections, it promotes resilient and sustainable communities and built environment, helping local planning authorities and developers to demonstrate they are prepared for the climate emergency;
- In EA's corporate plan 'EA 2025' in 'A nation resilient to climate change' EA state an ambition to be a stronger leader on climate adaptation and resilience, encouraging others to act now on the climate emergency and invest in adaptation;

- EA's Climate Ambition is to create a net zero nation that is resilient to climate change, putting it at the heart EA's activity will help EA and the country to be better prepared for climate impacts whilst limiting further climate change by driving down emissions; it focuses on three main areas: enabling UK net zero, preparing for climate impacts and walking the walk (EA net zero). The EA's climate change allowances guidance supports the second of these, by providing benchmarks for customers to use to help them design developments and flood risk infrastructure that is resilient to future flood risk;
- EA guidance promotes a robust approach to climate resilience, based on the high emission scenario of UKCP18, with the central allowance representing a 4°C increase by 2100; this ensures EA's approach is grounded on the latest evidence on the global climate change pathway we are currently following, reflected in UNEP Adaptation Gap report (Jan 2020), which states we are heading for a 3°C temperature rise this century, but this could be as high as 4°C.

### **Historic England (HE)**

- Agree with ADC's approach and the list of policies set out in June;
- Queried whether policies relating to heritage assets have been reviewed and found to be still fit for purpose;
- A considerable body of HE research and evidence in relation to climate change effects and the historic environment may assist the local plan update (references and sources provided).

### **Southern Water**

- Submitted general and specific points and in summary - fully support ADC's approach – two key challenges faced by Southern Water resulting from climate change and growth are increased flood risk (in particular the challenge of surface water entering the foul drainage network) and the need for greater water efficiency, to avoid or delay the need for increased abstraction;
- The right DM policies will help mitigate these impacts;
- Water re-use e.g. rainwater harvesting could be encouraged within development to lessen demands on water supply, and the added benefit of reducing surface water runoff;
- Suggested DM policy on Extensions/Alterations requiring SuDS for any increase in impermeable surface area such as roof or driveway, to mitigate the impact of increased surface runoff from the development, if not already addressed;
- Suggest priority would be sustainable drainage to reduce surface water runoff in line with Southern Water SuDS guidance; suds-outline-guidance.pdf (southernwater.co.uk), and to increase water efficiency in line with our T100 advice which would also help to reduce carbon.

1.4 No other responses were received.

### **CONCLUSIONS**

1.5 That the early engagement exercise on the draft list of DM policies has identified a number of helpful general and detailed points that can be used to inform the next stage of Regulation 18 Issues and Options consultation for the DM policies list

<p>update. That members consider the matters raised. Should the approach to plan making change (i.e. with regard to the 'Local Plan Update' item on the Agenda), the intelligence set out in this report (and detailed comments received on the list of DM policies) will remain relevant and be 'banked' if necessary to inform future plan making.</p>		
<p><b>2. PROPOSAL(S):</b></p> <p>2.1 That the Planning Policy Committee considers the early engagement response on DM policies and agrees the report.</p>		
<p><b>3. OPTIONS:</b></p> <p>3.1 That the Planning Policy Committee considers and agrees the report of responses or does not consider or agree the report.</p>		
<p><b>4. CONSULTATION:</b></p>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council	x	
Relevant District Ward Councillors		x
Other groups/persons (please specify) As set out in the report under 1.2.	x	
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial		x
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability		x
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<p><b>6. IMPLICATIONS:</b></p> <p>6.1 This is an early high-level engagement exercise, to help shape the next Regulation 18 consultation stage on Issues and Options, focussed on Development Management policies.</p>		
<p><b>7. REASON FOR THE DECISION:</b></p> <p>7.1 In order to progress speedy plan making, to ensure that the Local Plan update provides a Development Management Policies framework which enables local decision making on planning applications to require high standards for carbon reduction, decentralised energy, energy efficiency and mitigation/adaptation to climate change.</p>		
<p><b>8. BACKGROUND PAPERS:</b></p> <p>None.</p>		

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 6 OCTOBER 2021

#### REPORT

<b>SUBJECT: West Sussex Transport Plan 2022-2036 Consultation</b>
---

<b>REPORT AUTHOR:</b>	Kevin Owen, Planning Policy Team Leader
<b>DATE:</b>	September 2021
<b>EXTN:</b>	x 37853
<b>AREA:</b>	Planning

#### EXECUTIVE SUMMARY:

West Sussex County Council are reviewing their Local Transport Plan to update the County Council's approach to managing and investing in the transport network.

This report therefore, seeks agreement that the comments set out in this report form the basis for the Council's formal response to the West Sussex County Council document 'Draft West Sussex Transport Plan 2022-2036' (WSTP) published for consultation from Friday 16<sup>th</sup> July to Friday 8<sup>th</sup> October.

#### RECOMMENDATIONS:

That Planning Policy Committee agrees the comments set out in sections 1.8 to 1.12 of this report as the basis for Arun District Council's formal response to the consultation document 'Draft West Sussex Transport Plan 2022-2036'.

#### 1. BACKGROUND:

- 1.1 West Sussex County Council (WSSC) are reviewing their Local Transport Plan (WSTP) to update the County Council's strategic approach to investment in, and management of, the transport network.
- 1.2 The draft WSTP (Background paper 1) is out for consultation between 16 July - 8 October 2021 and seeks feedback on the content and the strategies set out in the document. Subject to any response, it is anticipated that the plan will be adopted in early 2022. The current West Sussex Transport Plan 2011-2026 is available on the WSSC web site (Background paper 2).
- 1.3 WSSC have also published on the web site alongside the WSTP document a Sustainability Appraisal, Scoping Report, Habitats Regulation Assessment report, Evidence Base Document, and a Frequently Asked Questions document.

1.4 The WSTP set out a Vision across West Sussex which in summary, seeks a transport network that:-

- best works for communities across the Local Enterprise Partnership (LEP) areas of 'Coastal West Sussex', 'Gatwick Diamond' and 'Rural West Sussex' up to the period 2036) addressing spatial economic challenges to level up the economy and provide access to employment and services;
- achieves a path to zero net carbon by 2050 through mass electrification reduced use of fossil fuels and more and safer, walking and cycling;
- Connect communities and green environments to allow healthy lifestyles;
- Active travel opportunities and access shared transport in urban and rural areas; and
- minimises noise, pollution and 'rat-running'.

1.5 Seventeen Objectives are identified, in summary themed around:-

- A prosperous West Sussex (e.g. economic regeneration, Covid\_19 recovery, levelling up, strategic investment for the future)
- A healthy West Sussex (e.g. ageing population, pollution, healthy lifestyles and access to green and blue spaces, and rural access to towns)
- A protected West Sussex (e.g. net zero carbon, adapting to climate change, protecting landscapes, the natural and built environment)
- A connected West Sussex (e.g. reduced car dependency, local living, reducing congestion, east-west community and A27, surface access to Gatwick, speed and quality of rail; West Coastway; Arun Valley; and Brighton Mainline; and bus services to towns).

1.6 To help address these objectives five strategies are formulated under the following titles:-

- Shared transport strategy (e.g. enhanced partnerships, bus priority, mobility/digital platform, areas of congestion - quality and frequency)
- Active travel strategy (e.g. new improved infrastructure, priorities suggested countywide, demand, feasibility, stakeholder support)
- Access to Gatwick Airport strategy (e.g. sustainable transport, users, community, shared transport local roads, rail connectivity, capacity, speed)
- Road network strategy (e.g. efficiency strategic routes, active travel and shared travel non-strategic routes, traffic management, parking, behaviour, speed, 'rat-running', impact on communities/environment, E-Vehicles charging, new roads integrate active travel/shared transport and only where development led or wider objectives)
- Rail strategy (e.g. promote speed, quality, coverage, rolling stock, prioritise existing lines and station improvements, better local connectivity services, level crossings and interchanges).

1.7 These are then broken down across the County in section 7 of the WSTP. What this means for the Arun strategy is set out in paragraphs 7.20 to 7.39 of the WSTP and summarised below as:-

## Arun District (outside South Downs National Park)

- Improve A27 (subject to Government and Highways England decisions)
- Major multi-modal improvements on A29, A284, A259
- Improve active travel facilities linked to strategic development
- Dedicate space for shared transport
- New shared transport services linked to strategic development
- Faster rail services in the long term

### Comments

- 1.8 There is much to support and commend in the overall approach and direction of the WSTP with respect to addressing climate change; net zero carbon; modal shift and electrification of transport and vehicles (and charging); emphasis on health and wellbeing; ageing population; rural accessibility; and integrating active travel walking and cycling (e.g. with transport and roads), tackling congestion, pollution and associated impacts on communities.
- 1.9 References are also welcome towards prioritising infrastructure investment (e.g. multimodal road) linked to key developments. This is particularly supported in Arun because of the spatial strategy in the Adopted Arun Local Plan 2018. This is reliant on delivering new communities within large Strategic Allocations linking with A27 and A259 east-west movement with north – south A29 and A284 connectivity, including access to the Barnham, Ford, Bognor Regis and Littlehampton rail stations, requiring strategic scale investment and integrated multi modal and active travel solutions including Dynamic Demand Responsive Transportation (DDRT e.g. dial up bus/transport services).
- 1.10 The Council is supportive of the Arun strategy in the WSTP:-

#### **Short term (2022-27) priorities for the Arun area**

- A27 Arundel Bypass (including active travel facilities)
- A29 Realignment phase 1 (including active travel facilities)
- A284 Lyminster Bypass (including active travel facilities)
- A259 Littlehampton corridor enhancement (including active travel facilities)
- A259 Bognor Regis to Littlehampton corridor enhancement (including shared transport facilities)
- DDRT and other shared transport services between Chichester, Havant, Bognor Regis and Littlehampton (connecting strategic developments in Chichester and Arun Districts)
- On-street electric vehicle charging infrastructure in Littlehampton

#### **Medium term (2027-32) priorities for the Arun area**

- A259 Chichester to Bognor Regis corridor enhancement (including shared transport and active travel facilities)
- A29 Realignment phase 2 (including active travel facilities) (development led)
- Priorities identified in the Arun Active Travel Study
- On-street electric vehicle charging infrastructure in remaining areas

**Long term (2032-36) priorities for the Arun area**

- Priorities identified in the Arun Active Travel Study
- Reconfigured West Coastway service
- Potential local highway capacity improvements (subject to need)

1.11 However, the Council has the following additional points and comments that would assist in adding robustness to the WSTP document and Arun strategy:-

**Climate Change**

- Climate change – the WSTP net zero Carbon target approach reflects current national policy and legislation – however, given many authorities in West Sussex including West Sussex County Council and Arun, have separately, declared a climate change emergency, the WSTP could signal a stronger intention to explore and exceed such targets through the role of transport in place making – particularly with the 26th UN Climate Change Conference of the Parties (COP26, Glasgow on 31 October – 12 November 2021), targets may change and the urgency for action to combat the existential threat exists now;
- Addressing air quality and pollution is also a key issue that also links to climate change where for example improved road (e.g. A27 Arundel Bypass) and rail crossing infrastructure, can help to reduce congestion, rat-running and therefore, carbon and harmful emissions within sensitive residential areas.

**Spatial context**

- The Council supports recognition that Arun is the most populated District in the County with the highest proportion aged 65+ and is set to grow and that modal shift because of barriers to mobility and health is an issue for the WSTP as well as this being a significant countywide issue. However, the impact on the young from covid-19 impact on the economy must also be recognised including the need to provide viable transport alternatives to the car, digital and active travel infrastructure and modal shift to encourage long term culture of health and wellbeing and reductions in carbon;
- Paragraph 7.23 recognises the importance for Arun's economy to improve and refers to efforts focussing on town centre regeneration in Bognor Regis and Littlehampton, the role of Butlins and recently expanded University campus in Bognor Regis. While this is supported including role of the visitor economy and education sectors, there should also be recognition of the specific planned delivery of 'Enterprise Bognor Regis' Strategic employment allocation and the role of Rolls Royce and the LEC Airfield employment area, focussed on the junction of the A29 and the A259. The strategic importance of opening up and servicing this land to provide locally accessible jobs and business diversification and skills and a reduced need for outward commuting in Arun, should have a greater emphasis in the WSTP. This is particularly relevant given the recognition of linking new road and transport infrastructure with development – to deliver 'local living' green communities and places, not just housing.

## **Transport context**

- Support WSTP recognition for the six railway stations: Bognor Regis, Barnham, Ford, Littlehampton, Arundel and Angmering; and that journey times to London have improved over recent years (with introduction of Thameslink services from Littlehampton) but that there is no direct rail link between Bognor Regis and Chichester or between Arundel and West Coastway. The WSTP considers that this presents opportunities for shared transport and active travel modes to cater for journeys between these towns. However, while this is supported – the WSTP should also include the Council's aspiration to see the Arundel Chord railway line included in the Arun strategy (e.g. this should include reviewing evidence studies examining journey times and value for money, based on railway stations within Arun e.g. Angmering to Horsham via the Arun Valley Line currently takes 1 hour via Barnham or Three Bridges).

## **Transport strategy – Arun**

- Support the key road and junction based deliverables included to help unlock east-west bottlenecks and connectivity to alternative north-south routes within Arun during peak congestion (e.g. the A27 junctions/Arundel bypass and A259 improvements and Bognor Regis to Littlehampton corridor enhancements, including A29 and A284 improvements etc). However, more clarity could be provided on resolving the rail crossing congestion and role of a Bridge at Ford in support of the Arun Local Plan development strategy.
- The WSTP acknowledges the mutual interdependencies for delivering the Arun and Chichester strategic allocations (in respect of adopted and emerging Local Plans) based on the planned A27 junction improvements. However, viability and scheme cost are emergent issues for this particular A27 corridor that make it more likely that these will not be deliverable without external funding sources. The WSTP should include reference to this 'live issue' in order for the partnership and advocacy approach (e.g. with highways England and DfT) to be developed.
- Returned s.106 payments needed to mitigate junction improvements e.g. on the A27 is also a 'live issue' where a lack of scheme design and enhancement capability can lead to s.106 being returned to developers or not received.
- The emphasis on modal shift and active travel (i.e. Arun's Active Travel Study priorities) together with parking demand management, is supported including working with strategic partners to deliver faster rail services from Barnham to Brighton and the Solent cities in the long term. However, there is also a need for station improvements such as at Barnham and Ford to serve planned growth and to boost 'in situ parking capacity' to complement demand management and avoid displaced on street parking conflicts with shared road space/active travel.
- Ford also has a particular need for platform safety improvements in view of a planned Secondary School to serve BEW, Ford and Yapton communities and Strategic Allocations.

<b>CONCLUSIONS</b>		
1.12 Arun District Council welcomes the opportunity to comment on the WSTP. This reports sets out the council's formal comments and supports the WSTP approach subject to the comments and clarifications sought above.		
<b>2. PROPOSAL(S):</b>		
That the Planning Policy Committee agrees the comments set out in paragraphs 1.8 to 1.12 of the report as the basis for the Council's formal response to the WSTP consultation.		
<b>3. OPTIONS:</b>		
8.1 That the Planning Policy Committee:- a) agreed the response or b) the response is not agreed.		
<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify)		x
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial		x
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability	x	
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>		
This response will help to identify and promote the priorities for investment in transport infrastructure to be included within West Sussex County Council's LTP and funding programmes in order to support delivery of the adopted Arun Local Plan.		
<b>7. REASON FOR THE DECISION:</b>		
The Council needs to respond to a formal public consultation by West Sussex County Council which is the Highway Authority responsible for updating the LTP, to ensure that future transport infrastructure and investment is sustainable and addresses the need for mitigating the impact of development in order to serve the communities in Arun.		

**8. BACKGROUND PAPERS:**

Background Paper 1: WSCC LTP i.e. WSTP consultation

<https://yourvoice.westsussex.gov.uk/9868/widgets/28223/documents/13943>

Background paper 2 current WSCC LTP

[https://www.westsussex.gov.uk/media/3042/west\\_sussex\\_transport\\_plan\\_2011-2026\\_low\\_res.pdf](https://www.westsussex.gov.uk/media/3042/west_sussex_transport_plan_2011-2026_low_res.pdf)

This page is intentionally left blank

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 06 OCTOBER 2021

#### REPORT

<b>SUBJECT: Duty to Cooperate - Statement of Common Ground between Horsham District Council and Arun District Council</b>
---

<b>REPORT AUTHOR:</b> Kevin Owen, Planning Policy Team Leader <b>DATE:</b> September 2021 <b>EXTN:</b> x 37853 <b>AREA:</b> Planning
---

#### EXECUTIVE SUMMARY:

This report seeks Members' agreement that the Chair of Planning Policy Committee is authorised to sign the joint 'Statement of Common Ground' with Horsham District Council.

#### RECOMMENDATIONS:

That the Planning Policy Committee agree:-

1. The Chair of Planning Policy Committee be authorised to sign the joint Statement of Common Ground with Horsham District Council.

#### 1. BACKGROUND:

- 1.1 Under the 'Duty to Cooperate' a joint Statment of Common Ground (SCG) has been drafted (Appendix 1) between Horsham District Council and Arun District Council. Horsham are approaching a Regulation 19 pre submission consultation on their Local Plan (anticipated November/December 2021). The SCG is in two parts; Part A is context; and Part B is specifically in regard to Arun District Council. Horsham District Council is able to demonstrate that it is able to meet its own needs and does not seek the assistance of other authorities, including ADC, in this matter with regards to the Horsham Local Plan 2038. Any residual unmet needs across the sub region will be resolved via the Coastal West Sussex and Greater Brighton Planning Board. Both parties agree that the best way of addressing need across the wider sub-region is through progressing work on Local Strategic Statement 3 and are committed to working together and as part of this wider grouping on this issue.
- 1.2 This report seeks agreement that, under the new Constitution and Committee arrangements, that the Statement of Common Ground be signed by the Chairman of the Planning Policy Committee on behalf of ADC.

**2. PROPOSAL(S):**

To agree that the Chair of Planning Policy Committee is authorised to sign the joint Statement of Common Ground with Horsham District Council.

**3. OPTIONS:**

The following options are available to Members:

1. Not to agree the authorisation.

**4. CONSULTATION:**

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

**6. IMPLICATIONS:**

Under the legal 'Duty to Cooperate', the Council must cooperate in a constructive and ongoing manner in responding to cross-boundary planning matters with other planning authorities and this should be evidenced in signed 'Statements of Common Ground' and published on the Council's web site.

**7. REASON FOR THE DECISION:**

To ensure that the joint Statement of Common Ground is appropriately authorised and signed.

## Horsham Duty to Cooperate: Statement of Common Ground Part A

### Horsham District Local Plan 2038: Regulation 19

Dates of issue: xx.xx.2022

---

#### 1. Introduction, Scope and list of parties involved

1.1 This statement sets out the context of Duty to Cooperate<sup>1</sup> activities at a sub-regional level involving Horsham District Council (HDC). In particular, it explains these key sub-regional joint activities:

- i. The joint working activities of the North West Sussex Housing Market Area (NWS-HMA)
- ii. The work being progressed by the West Sussex and Greater Brighton Strategic Planning Board to agree a joint Local Strategic Statement 3 (LSS3)
- iii. The joint working activities of the Gatwick Diamond Growth Area.

1.2 The parties to this Statement of Common Ground Part A are:

##### Local Authorities:

- |                                |                                       |
|--------------------------------|---------------------------------------|
| • West Sussex County Council   | • Mole Valley District Council        |
| • Adur District Council        | • Reigate & Banstead Borough Council  |
| • Arun District Council        |                                       |
| • Brighton & Hove City Council | • South Downs National Park Authority |
| • Chichester District Council  | • Waverley District Council           |
| • Crawley Borough Council      | • Worthing Borough Council            |
| • Mid Sussex District Council  |                                       |

##### National agencies:

- Sussex Local Nature Partnership
- Environment Agency
- Historic England
- Natural England
- Sports England
- Network Rail

---

<sup>1</sup> The Duty to Cooperate in plan-making terms is defined in the NPPF paragraphs 24-27 and further explained in national Planning Practice Guidance (PPG) in the section 'Plan-making', subsection 'Maintaining Effective Cooperation'. PPG also sets out guidance on preparing a Statement of Common Ground.

- 1.3 This Part A statement has been prepared alongside preparation of the Horsham District Local Plan for the period to 2038, and is supplemented with a series of Part B statements which set out specific cross-boundary issues more appropriately dealt with on a bi-lateral or tri-lateral basis. Part A and the relevant Part B should be read in conjunction.

## **2. Signatories**

- 2.1 See Parts B for the respective signatories to this statement.

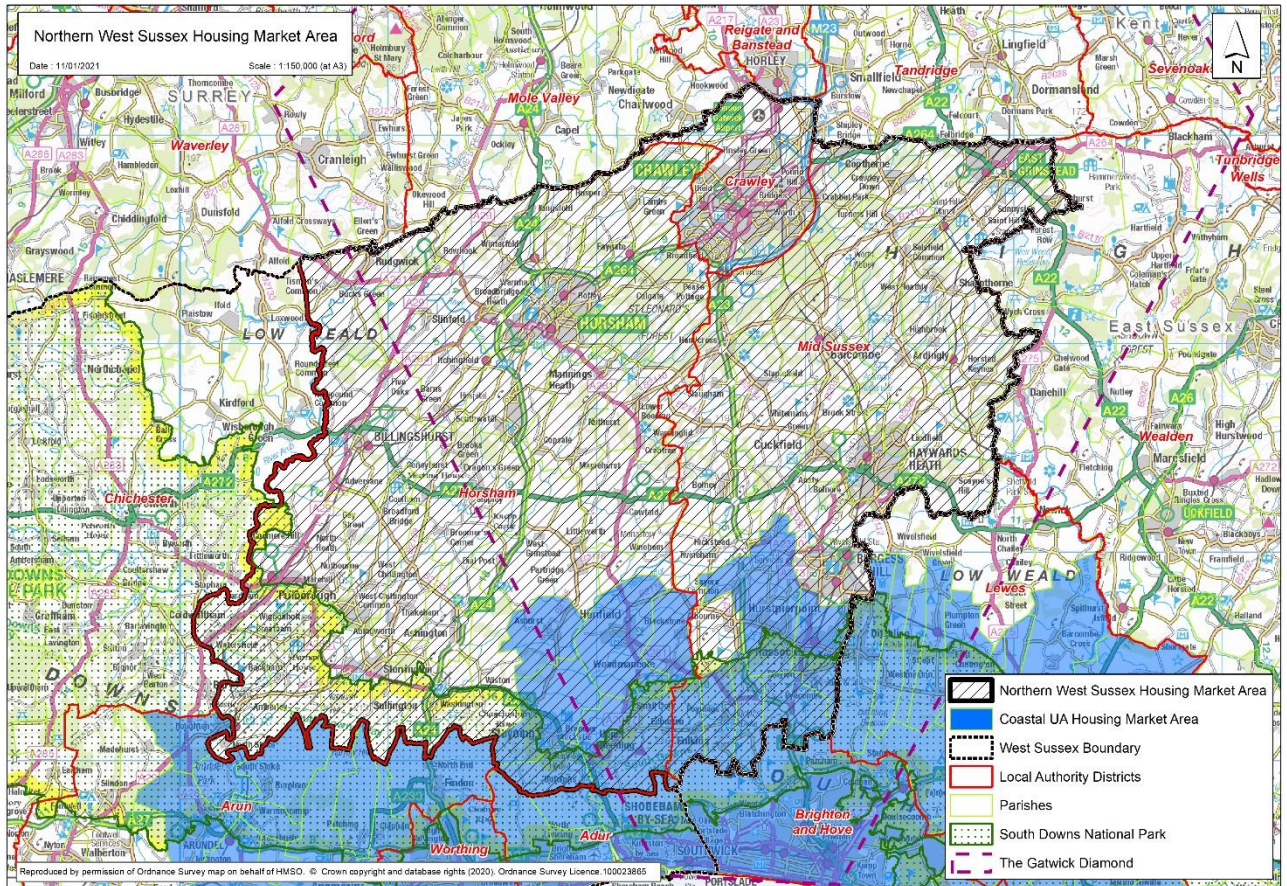
## **Statement**

---

### **3. Strategic Geography**

- 3.1 Horsham District is located in West Sussex, within the South East of England. The district covers an area of 530km<sup>2</sup> (205 square miles) and is predominantly rural in character, containing a number of smaller villages and towns. The largest urban area is the market town of Horsham, situated in the north-east of the District.
- 3.2 95km<sup>2</sup> (36.49 square miles) of the District falls within the South Downs National Park. Although Horsham District Council is not the planning authority for this area, this nationally important landscape provides an important landscape context for locations across the district.
- 3.3 The District lies within the area covered by the Coast to Capital Local Enterprise Partnership. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area. The area boasts a strong economy worth £50.7 billion gross value added (GVA), making it the seventh largest local economy in England.
- 3.4 The majority of Horsham District is also located within the Gatwick Diamond economic area. This extends from Croydon in the north, around Gatwick Airport and down the A23 corridor to the south coast.
- 3.5 The whole of the District also falls within the North West Sussex Housing Market Area (NWS-HMA), together with Crawley Borough Council and Mid Sussex District Council.
- 3.6 A modest southern portion of the District also falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). Whilst this identified HMA only includes a small part of Horsham district, it nevertheless has significant implications on future cross-boundary planning. This is because many of the local planning authority areas within the CWS-HMA are tightly constrained built-up areas, meaning that not all development needs identified within those areas can be met within their administrative boundaries.

**Figure 1: Key spatial parameters for Duty to Cooperate activities**



#### **4. Strategic matters and how these are being addressed at the sub-regional level**

4.1 Strategic matters relevant to the wider area are wide-ranging. The key matters are:

- i. Employment and economic strategy
- ii. Housing need
- iii. Strategic infrastructure
- iv. Green infrastructure and biodiversity

4.2 There is significant crossover between these matters, and various mechanisms for addressing them. As such, the following paragraphs outline the main mechanisms and ongoing activities that seek to address cross-boundary strategic issues, together with the lead organisations who are active partners within them.

4.3 All parties agree that a further key matter is addressing climate change, and in particular decarbonising our communities. This is a cross-cutting theme that runs through other key matters, and will also be picked up in more detail through existing joint work and groupings including those set out below.

##### **A. Northern West Sussex Housing Market Area (NWS-HMA)**

4.4 The lead partners in the NWS-HMA are:

- Horsham District Council (HDC)
- Mid Sussex District Council (MSDC)
- Crawley Borough Council (CBC)
- West Sussex County Council (WSCC)

4.5 These Councils are located within the county of West Sussex. Studies undertaken since 2009 have consistently confirmed the three district/borough authority areas form a close Housing Market Area (Northern West Sussex “NWS”) and are part of wider Economic Functional Areas (Gatwick Diamond centred on Crawley/Gatwick Airport, and to the south of the Districts: Greater Brighton). The NWS authorities form part of the ‘Coast to Capital’ Local Enterprise Partnership, which stretches from Chichester in the south west, along the coast to Brighton and Newhaven and Seaford through Mid Sussex and Crawley to Croydon on the outskirts of London.

4.6 The key activities and outputs from this grouping covering the NWS area are as follows:

- a. The *Economic Growth Assessment (EGA)* provides a common evidence base which quantifies the strategic need for the area as a whole and each authority area within it. It also provides an expert steer as to the types of employment growth that will meet the shared economic objectives of the area, and relates this to spatial dynamics including transport and infrastructure networks. It was initially started in 2009. There have been various updates the latest being in January 2020.
- b. The *Strategic Housing Market Assessment (SHMA)* provides a common evidence base on the levels and types of housing need within the HMA. It uses the current Government guidance to calculating overall ‘local housing need’ using the standard methodology for the respective authority areas. It also estimates the quantum and types of need for particular dwelling sizes, affordable housing, older persons housing, and housing for those with disabilities. The latest SHMA is dated November 2019.
- c. A *Gatwick Sub-Region Water Cycle Study (WCS)* provides a common evidence base the potential issues relating to future development within the Gatwick Sub-Region and the impacts on water supply, wastewater collection and treatment and water quality. As well as covering the NWS area, it additionally covers Reigate and Banstead Borough to the north of Crawley. The latest WCS is dated August 2020. A supplement to the Water Cycle Study, to deal specifically with water neutrality and impacts on the Arun Valley SAC/SPA, has recently been commissioned. A brief for this has been jointly agreed by HDC, CBC and Chichester District Council.

4.7 The authorities share methodologies and emerging evidence to ensure consistency and compatibility throughout the area, even if studies are being produced separately. These include: Strategic Housing Land Availability Assessments, transport modelling to support plan-making, and Gypsy and Traveller Accommodation Needs Assessments. The activities of the NWS group of authorities is documented in more detail in the Northern West Sussex Statement of Common Ground dated May 2020.

4.8 Details of how unmet development needs are being addressed in the NWS-HMA are set out in the relevant Part B sections of this statement.

#### B. West Sussex and Greater Brighton Strategic Planning Board

4.9 The West Sussex and Greater Brighton Strategic Planning Board (WS&GB) consists of the following partners:

- Adur District Council
- Arun District Council
- Brighton & Hove City Council
- Chichester District Council
- Crawley Borough Council
- Horsham District Council
- Lewes District Council
- Mid Sussex District Council
- Worthing Borough Council
- South Downs National Park Authority
- West Sussex County Council

4.10 WS&GB consist of lead Council Members, supported by senior officers. Its remit is to:

- a. Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
- b. Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.

4.11 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015, and is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. These priorities reflect the local planning authorities' clear aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for local plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.

4.12 Despite having LSS2 in place, all partners have recognised that a full review of LSS2 will be required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly address the continuing gap between objectively assessed housing needs and housing delivery in the sub-region and the continuing challenges around supporting sustainable economic growth and infrastructure investment. To inform the preparation of LSS3 the following joint study has been completed:

*Defining the HMA and FEMA* (GL Hearne, 2017) provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. The boundaries of these respective areas are shown in **Figure 1**. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.

4.13 An updated Statement of Common Ground is being prepared. This is likely to document the extent of unmet housing need to reflect a commonly agreed position. All WS&GB partners have committed to undertaking the following:

- a. Robustly and creatively explore options for meeting the unmet needs across the Board area, starting by leaving 'no stone unturned' within the respective administrative boundary for the period up to 2030 and for these options to inform local plan reviews;
- b. Prepare a Local Strategic Statement 3 covering the period 2030 to 2050 with an appropriate level of stakeholder participation to ensure that all those with an interest in LSS3 have an opportunity to engage in the development of the strategy;
- c. Commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following:
  - A baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;
  - A common methodology for determining the 'no stone unturned' approach to identifying possible locations to meet any unmet need;
  - The capacity of the Board area to absorb further growth in this period;
  - The likely required level of growth between 2030 and 2050;
  - The strategic options available to deliver additional growth;
  - The investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.

#### C. Gatwick Diamond authorities

4.14 The Gatwick Diamond is a diamond-shaped area, with Gatwick Airport at its heart, running between London and Brighton, and extending to Horsham in the west and East Grinstead to the east. As the world's busiest single runway airport, Gatwick Airport has a significant on the economy and prosperity of the authorities within the Diamond.

4.15 The Gatwick Diamond (GD) Authorities is a partnership of local authorities working together to coordinate on strategic planning and development issues affecting the Gatwick Diamond. The GD authorities are:

- |                                   |  |
|-----------------------------------|--|
| • Surrey County Council           | • Mid Sussex District Council          |
| • West Sussex County Council      | • Mole Valley District Council         |
| • Crawley Borough Council         | • Reigate and Banstead Borough Council |
| • Epsom and Ewell Borough Council | • Tandridge District Council           |
| • Horsham District Council        |  |

4.16 The GD authorities have recognised the need to coordinate on strategic planning issues, in order to promote the continued prosperity of the Gatwick Diamond and plan for its future growth. They have worked on and signed up to a Gatwick Diamond Memorandum of Understanding (published March 2012) which was accompanied by a Gatwick Diamond Local Strategic Statement (GD-LSS). The GD-LSS was reviewed and updated in 2016.

4.17 The GD-LSS continues to form the basis for inter-authority cooperation on strategic issues relevant to this area, identifying priority themes for joint working, so that decisions made through the plan making processes are fully informed.

#### D. Coordination of green infrastructure and natural capital assets

4.18 There is common recognition amongst public bodies in the West Sussex and Surrey areas and wider that successful enhancement of natural capital requires a cross-boundary approach. The following joint working mechanisms are used across the sub-region to achieve this coordination:

- a. *Sussex Local Nature Partnership (LNP)*: This group was formed in 2014 and brings together around 25 organisations in Sussex. Its objectives are to conserve, enhance and expand Sussex's Natural Capital, and ensure that Sussex residents share in the benefits provided by healthy, well-functioning ecosystems. West Sussex County Council is a partner. In December 2019, the Sussex LNP published a Natural Capital Investment Strategy for Sussex. HDC will have regard to this strategy (and future updates) within its strategy, with particular regard to its reference to: *"The LNP investment strategy provides the strategic and spatial information needed to properly inform local decisions that influence natural capital assets."*
- b. *Wilder Horsham (WH)*: WH is a five-year partnership between Sussex Wildlife Trust (SWT) and HDC, which was formally agreed by HDC Cabinet on 28 November 2019<sup>2</sup>. It will link with the work of the Sussex Local Nature Partnership, recognising that the Natural Capital Investment Strategy for Sussex provides a shared framework for nature's recovery in Sussex. Agreed actions under 'Organisational resilience' include to *"draw on the expertise of the Sussex Wildlife Trust to make further improvements and enhance the presence of the Trust throughout the District"* and to work with SWT to *"embed the principles of the Wilder Horsham District programme into all parts of the organisation... For example, the Trust will run training events for staff and help the council develop policies on biodiversity as part of the review of the Local Plan, as well as reviewing the existing Green Infrastructure Strategy (2014)."*

4.19 Further details on the outcomes of joint working on green infrastructure and natural capital may be provided in separate bilateral statements as appropriate.

## **5. Housing need, supply and distribution**

5.1 The relationship between housing need and its supply and distribution within relevant HMAs is complex. This is being considered in light of recent confirmation of how 'local housing need' for districts, boroughs and unitary authorities should be calculated, and will be addressed both through respective local plan processes, and through ongoing strategic groupings as described above. This section of this statement will be updated when these matters have been clarified.

## **6. Closing matters and further work**

---

<sup>2</sup> The Report to Cabinet and minutes of meeting can be found at <https://horsham.moderngov.co.uk/ieListDocuments.aspx?CId=132&MId=1486&Ver=4>

- 6.1 This statement demonstrates that there is a shared commitment between local authority partners in the subregion to work jointly and constructively on relevant cross-boundary matters at a sub-regional level. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.
- 6.2 Part B of this statement sets out specific cross-boundary issues more appropriately dealt with on a bi-lateral or tri-lateral basis.
- 6.3 At the time of preparation, the international community is experiencing a worldwide pandemic of Coronavirus (Covid-19). This situation is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in parts A and B of this statement, for example due to likely (yet unknown) impacts on the economy at all levels, and on the housing market.
- 6.4 Also at the time of preparation, the UK Government is consulting on radical and fundamental changes to the English planning system. However transition arrangements are proposed which would allow local plans at an advance state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the Horsham District Local Plan should continue to be prepared in accordance with current legislation and guidance, including using existing practice guidance on calculating the standard methodology local housing need as published on 16 December 2020 (Planning Practice Guidance paragraph: 006 Reference ID: 2a-004-20201216).

## Horsham / Arun District Council Statement of Common Ground Part B

### Horsham Local Plan 2037: Regulation 19

---

#### Signatories:

[Partner body signatory name and position]	[HDC signatory name and position]
[insert signature]	Insert signature

Dated: xx xx xx

#### Statement

---

#### 1. Introduction and Scope

- 1.1 This statement supplements the Statement of Common Ground Part A which forms the first part of this document. The purpose of this statement is to document the strategic cross-boundary matters that have been or are being addressed jointly by the parties, as necessary to demonstrate effective joint working, or to draw out areas of common ground that are specific or unique to the parties.
- 1.2 The matters dealt with in this statement are:
  - Section 2: Housing need (common ground agreed)
  - Section 3: Gypsy and Traveller Accommodation (common ground agreed)
  - Section 4: Employment uses (common ground agreed)
- 1.3 This statement has been produced in preparation for the Regulation 19 stage of the Horsham Local Plan 2038. It is anticipated that this statement will be updated to relate to later stages of the Local Plan and changes in circumstance.
- 1.4 Both signatories to this statement reserve the right to withdraw its endorsement to this statement at any time. If this situation arises, formal withdrawal from the agreement should be set out in a formal written notification to the other signatories to this statement.

#### 2. Housing need

##### *Local Housing Need*

- 2.1 The starting point for Local Plans is the standard housing methodology which, at the time of writing, identifies housing needs of 897 p.a. and 1,326 p.a. for Horsham District Council (HDC) and Arun District Council (ADC), respectively.
- 2.2 HDC and ADC are in different positions in the reviews of their respective Local Plans. HDC is at the Regulation 19 publication stage whereas ADC has only recently commenced work on its review by

undertaking early visioning work and engagement on priorities for reviewing Development Management policies.

- 2.3 HDC is able to demonstrate that it is able to meet its own needs in and does not seek the assistance of other authorities, including ADC, in this matter with regards to the Horsham Local Plan 2038. Owing to being at an early stage of plan making, ADC is will need to undertake evidence base work to understand its ability to meet its own housing needs as part of its review of the District Plan. At this stage, ADC has indicated it is unlikely to require assistance from other authorities, including HDC, to meet its own need.

#### *Meeting wider needs*

- 2.4 The parties note and agree that the main Housing Market Area for HDC is the Northern West Sussex HMA and evidence for this is set out in Section 4A of Part A to this Statement of Common Ground. The Northern West Sussex HMA covers the authorities of HDC, Mid Sussex District Council (MSDC) and Crawley Borough Council (CBC).
- 2.5 The parties also agree that the main HMA for ADC is the Sussex Coast HMA. This covers the authorities of ADC, Adur District Council, Brighton & Hove City Council, Chichester District Council, Lewes District Council and Worthing Borough Council, as well as a large part of the South Downs National Park Authority. An area of HDC also lies within this HMA.
- 2.6 Both parties acknowledge that the other has a history of working positively to address unmet needs in their primary HMA. Within the existing Horsham District Planning Framework (HDPF, 2015), an allowance of 150 homes per year is made for unmet needs in CBC. Similarly, the Arun Local Plan included an allowance of 1,500 homes to meet wider needs.
- 2.7 Both authorities recognise that that though they do not share a primary HMA, there is a relationship between both the North West Sussex HMA and Sussex Coast HMA. As presented in Part A of this Statement of Common Ground, both authorities form part of the Coastal West Sussex and Greater Brighton Planning Board. Both parties agree that the best way of addressing need across the wider sub-region is through progressing work on Local Strategic Statement 3 and are committed to working together and as part of this wider grouping on this issue. To a lesser effect, both authorities are also influenced by other HMAs. In HDC's case this relates to housing markets in Surrey/London. However the parties agree that, given evidenced housing market geographies, this is a lower priority.
- 2.8 Over time, both authorities have received requests to accommodate unmet housing needs from both authorities within their primary HMAs (e.g. Worthing) and outside. The parties agree however that the priority for both authorities is to first address their own need, then the needs from their primary HMA prior to addressing needs arising from other areas and that this is the approach that HDC has followed in producing its Regulation 19 Local Plan.

### **3. Gypsy and Traveller Accommodation**

- 3.1 The parties note and agree that HDC does not seek for its Gypsy and Traveller needs to be met within other local authorities and in its Regulation 19 Local Plan seeks to allocate sufficient sites to meet its 10-year needs.
- 3.2 ADC confirm that at the current time it is not seeking for assistance from other authorities, including HDC, in meeting its Gypsy and Traveller needs and is seeking to advance its Gypsy and

Traveller Sites DPD to meet its need. Both parties agree that the signed Statement of Common Ground (October 2020) in relation to the Gypsy and Traveller Sites DPD is still relevant and reflects the current position

#### **4. Employment Uses**

- 4.1 The parties note and agree that HDC does not seek its employment needs to be met within other local authorities and that the Regulation 19 Local Plan seeks to oversupply against needs in order to meet plan objectives and allow expansion and modernisation of some existing business parks to ensure their continued success. ADC confirm that at the current time it is not seeking for assistance from other authorities, including HDC, in meeting its employment needs and that they, too, are oversupplying employment land, in part to help address unmet needs from Worthing.
- 4.2 The parties agree, as identified in Part A of this Statement of Common Ground, to continue to work proactively and collectively as part of wider groupings in relation to economic matters.

#### **5. Closing matters and further work**

- 5.1 The parties to this statement have demonstrated in Parts A and B of this statement that they have worked jointly and constructively on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.

This page is intentionally left blank

<b>Planning Policy Committee</b> Karl Roberts, Neil Crowther	<b>Report Author</b>	<b>Agenda Publish Date</b>	<b>Date of Meeting</b>	<b>Full Council Meeting Date</b>
Local Plan Update	K Owen	20 May 21	<b>1 June 21</b>	14 July 21
Arun Active Travel Study (Phase 1)	K Owen			
Evidence Base Commissioning Update	K Owen			
Infrastructure Investment Plan – Briefing Note	K Owen			
Creating Healthy & Sustainable Places – WSCC	K Owen			
Local Plan Updated – Development Management Policies	K Owen			
Funding to Review/Update Made Neighbourhood Development Plans	D Moles			
Delivery of West Bank Strategic Allocation	K Roberts			

A259 Corridor Improvements Consultation	K Owen	8 July 21	<b>20 July 21</b>	15 September 21
Arun Infrastructure Investment Plan Update	K Owen			
Arun Action Plan – Update	K Owen			
Duty to Cooperate - Statement of Common Ground between Crawley Borough Council and Arun District Council	K Owen			
Coastal Change Management Areas	R Spencer	24 Sept 21	<b>6 Oct 21</b>	10 Nov 21
Infrastructure Funding Statement	K Owen			
Local Plan Update	K Owen			
DM Policies Engagement Feedback	K Owen			
West Sussex Transport Plan 2022-2036 Consultation	K Owen			
Horsham District Council – Statement of Common Ground	K Owen			
Budget 2022/23 Setting Report	C Martlew			

Local Plan Update – Regulation 18 Notice Development Management Policies	K Owen	18 Nov 21	<b>30 Nov 21</b>	12 Jan 22
Local Plan Evidence Update	K Owen			
Masterplans	K Roberts			
Local Development Scheme Update	K Owen			
Statement of Community Involvement – Update	K Owen			
First Homes Policy	K Owen			
Authorities Monitoring Report (AMR)	K Owen	13 Jan 22	<b>25 Jan 22</b>	9 March 22
Housing Economic Land Availability Assessment (HELAA)	K Owen			
Infrastructure Investment Plan	K Owen			
Budget 2022/23 Timetable	C Martlew			
Local Plan Update Draft DM Policies Reg 18 Consultation	K Owen	3 March 22	<b>15 March 22</b>	11 May 22
Local Plan Evidence Update	K Owen			

This page is intentionally left blank