



Public Document Pack

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19 November 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 **Tuesday 30 November 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 [link](#).

- 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 by 5.15 pm on Monday 22 November 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

AGENDA

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 - 10)

The Committee will be asked to approve as a correct record the Minutes of the Planning Policy Committee held on 6 October 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. TO 'MAKE' THE BARNHAM AND EASTERGATE NEIGHBOURHOOD DEVELOPMENT PLAN (REVIEW) 2019-2031 (Pages 11 - 14)

The Barnham and Eastergate Neighbourhood Development Plan 2019-2031 passed Examination in October 2021. The Examiner of this modified Plan concluded that the Plan passed the Examination and that the material modifications do not change the nature of the Plan and it does not require a Referendum so should proceed to be 'made'.

This 'making' of the plan will give it legal force and it will form part of the statutory Development Plan for that area. Consequently, decisions on planning applications in the neighbourhood area will need to be made in accordance with the Neighbourhood Development Plan, unless material considerations indicate otherwise.

[15 minutes]

7. FIRST HOMES POLICY (Pages 15 - 20)

This report asks Members to recommend that Full Council agree a proposed approach to implementing the Government's 30% 'First Homes Policy' as part of the affordable housing tenure mix in Policy AH SP2 Affordable Housing and Policy H DM1 Housing Mix.

[20 minutes]

8. SOUTHERN WATER DRAINAGE AND WASTEWATER MANAGEMENT PLAN CONSULTATION (Pages 21 - 30)

Southern Water are in the process of preparing the first Drainage and Wastewater Management Plan (DWMP) and have reached the early scoping consultation stage. A full formal public consultation on the DWMP will be undertaken in the summer 2022.

This report, therefore, seeks agreement that the provisional comments summarised in this report (fully amplified in the officer provisional letter of response sent by the due deadline [Appendix 1]) and any other matters raised by Members forms the basis for the Council's response to the documents published for consultation from 21 September to midnight on 26 October.

[40 minutes]

9. LOCAL PLAN EVIDENCE UPDATE

(Pages 31 - 40)

This report updates Members on the remaining evidence position, on whether any further studies to those already committed, should be commissioned should they not be affected by planning reforms (following the Planning Policy Committee 6 October meeting which agreed under the 'Arun Local Plan Update' item, to recommend Option 3 to Full Council i.e., to pause plan making).

[30 minutes]

OUTSIDE BODIES - FEEDBACK FROM MEETINGS

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

10. WORK PROGRAMME

(Pages 41 - 44)

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](#)

PLANNING POLICY COMMITTEE

6 October 2021 at 6.00 pm

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

The following Member was absent from the meeting during consideration of the matters referred to in the Minutes indicated:-
Councillor Jones - Minute 338 (Part) to Minute 342.

Councillor Gunner was also in attendance for all or part of the meeting.

329. APOLOGIES FOR ABSENCE

An Apology for Absence had been received from Councillor Charles.

330. DECLARATIONS OF INTEREST

Councillor Coster made an Open-minded Declaration in regard of Agenda Item 6 [Motion] and made the Committee aware he may have made comments on previous occasions in connection with the subject matter of the motion. He confirmed those were the views he held at the time however he had an open mind regarding this item, and would listen and consider all the relevant issues and interests presented to the Committee and reach his decision on merit.

331. MINUTES

The Minutes of the previous meeting held on 20 July 2021 were approved by the Committee and signed by the Chair.

332. 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.

333. PUBLIC QUESTION TIME

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

334. MOTION

At the beginning of this item, the Chair proposed a Motion to proceed to next business (as per Part 5, Section 2, 13.11 iii) of the Constitution) as the original proposer had asked that the Motion referred from Full Council on 15 September 2021 to this Committee be withdrawn and the action referred to in the Motion had been taken. This was seconded by the Vice-Chair.

The Committee

RESOLVED

To proceed to next business.

335. BUDGET 2022/2023 PROCESS

Upon the invitation of the Chair, the Group Accountant presented this report explaining that under the newly adopted Committee structure it was important that all Members be fully aware of the budget process. He further explained that the Council continued to face net expenditure pressures due to ongoing financial uncertainties and the report recognised the need for some resource switching in order to progress the Council's priorities and continue to meet statutory requirements. Any growth proposals would have to clearly state their financial implications and resource switching as appropriate.

The Chair raised the matter of the budget and how it was divided between this Committee and the Planning Committee especially when matters that went across the two Committees such as the Planning Review were considered, and whether the whole of the budget should be the responsibility of this Committee as the Service Committee for planning matters.

The Committee

RESOLVED

To note the budget setting process for 2022/23.

336. COASTAL CHANGE MANAGEMENT AREAS

(During the debate, Councillor Elkins declared a Personal Interest as the Council's representative on the Local Government Association's Coastal Special Interest Group.)

Upon the invitation of the Chair, the Engineering Services Manager presented his report which contained a draft consultants' brief for endorsement by Members to investigate the introduction of a Coastal Change Management Area (CCMA) following a decision by Cabinet in October 2020 to allocate £30,000 for this undertaking. The report also sought endorsement of how planning applications in the Pagham area would be dealt with in the meantime. The Engineering Services Manager highlighted the dynamic nature of the coastal erosion in Pagham and the risk of flooding.

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

- whether the CCMA should cover an area wider than illustrated in Appendix 1 of the report, and how it might impact the strategic sites in Pagham in the Local Plan
- the nature of the consultation process and involvement of environmental agencies (Natural England etc) because of the sensitivity of sites in Pagham being Sites of Special Scientific Interest
- the need for an indication of timescales, particularly in relation to concerns over flooding at Pagham harbour due to the unpredictable movement of the spit and the potentially significant consequences of this
- the need to treat the introduction of a CCMA as a matter of urgency due to events at Climping and widen the area to cover from West of the river Arun to Pagham
- statements in the NPPF which state that developments have to be safe for their lifetime, and Members not knowing without the evidence of the CCMA consultation if that would be the case for new or existing development
- whether Officers had all the recommendations they needed to proceed with the study in the report or whether further approvals would be needed between Committee meetings
- whether other vulnerable areas were looked at in the preliminary stages of this report and would be brought forward for their own CCMA's
- the involvement and implications for the Council's Planning team
- the need for a refresh of the shoreline management plan and areas whose inclusion might need re-examination

The Engineering Services Manager provided Members with answers to all points raised during the debate. He confirmed to Members that the report looked at the implications of having a CCMA rather than suggesting the introduction of one at this stage, but agreed with the urgency raised by Members.

The recommendations were then proposed and seconded.

The Committee

RESOLVED - that

1. The outline brief for the Coastal Change Management Area (CCMA) study (as set out in 1.14 to 18 as appropriate) be approved.
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. The draw-down of any further Local Levy monies granted by the Southern Regional Flood and Coastal Committee be authorised for the CCMA work.

337. INFRASTRUCTURE FUNDING STATEMENT

Upon the invitation of the Chair, the Planning Policy and Conservation Team Leader presented his report and explained that the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) included a requirement for all planning obligation collecting authorities to prepare an annual Infrastructure Funding Statement to be published on the web site at the end of the calendar year reporting planning obligation income and CIL and expenditure from the previous financial year.

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

- whether funding could be provided for a school bus programme with its benefits of reducing congestion and pollution, and whether as a County Council responsibility they could take it on as a CIL commitment
- the terminology of funds 'not been formally allocated' and greater detail on where these might be allocated

The Planning Policy and Conservation Team Leader and Group Head of Planning provided Members with answers to all points raised during the debate. The Group Head of Planning confirmed that all Section 106 receipts were identified for a project by law (which were detailed in the appendices) but that planning terminology used 'unallocated' until funds had been received.

The recommendation was then proposed and seconded.

The Committee

RESOLVED

That the Arun Infrastructure Funding Statement 2020/21 be agreed and published on the Arun District Council website in accordance with Regulation 121A of the Community Infrastructure Regulations 2010 (as amended).

338. ARUN LOCAL PLAN UPDATE

(Councillor Jones left the meeting during this item.)

Upon the invitation of the Chair, the Planning Policy and Conservation Team Leader presented his report which updated Members on the issues affecting the progress of the Local Plan update and progression of the Vision and Objectives whilst also anticipating significant Government planning and regulatory reforms. He outlined a number of options Members might have wished 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.

The options put before the Committee were:

- 1) Continue with Full Plan Preparation as per previous resolutions
- 2) Continue with Full Plan Preparation but with an Extended Timescale
- 3) Pause the preparation of a revised Local Plan until details of the new plan making system were agreed.

Members (and one non-Committee Member) then took part in a full debate on the item where a number of points were raised including:

- the recent change in the Secretary of State and indications made that he already wished to review and revise aspects of the bill, and the resultant delay this might cause
- knowledge of other local planning authorities who had suspended progress of their Local Plans because of the imminent changes in the White Paper, so precedent for option 3
- previous experiences with the development of Local Plans during periods when planning rules were changing and the added costs involved, and the possibility of spending on a Local Plan that would have to be reviewed as circumstances have changed
- a lot of time spent time doing the Vision and Objectives earlier in the year, disappointment and uncertainty over why they were abandoned, and how could the Council proceed with the Local Plan update if a basic vision could not be agreed upon
- the evidence base previously commissioned having been extremely useful and reluctant to waste the money spent on it
- support for option 1 and proceeding with the original plan due to concerns over the risks involved with waiting or the process becoming stop/start
- the efficacy between options 2 and 3, and whether there was any work that it would be safe to proceed with in an extended timescale
- the possibility of the removal of the 5-year housing supply and the objective assessed housing need figure derived from it, and so unnecessarily planning for housing numbers that may not be required

- concerns over deferral (option 3) and whether the situation should be reviewed by Committee on a regular basis to be more proactive due to the changing nature of policies
- the Local Plan being classed as failing by the Authority Monitoring Report, so other issues that needed to be address in addition to 5-year housing supply
- whether the Council exposed itself to risk from neighbouring Local Authorities due to delays in evidence updates, for example through 'Duty to Cooperate' agreements with no up-to-date data on what the District could or could not accommodate
- the significant quantity of planning approvals waiting to be implemented across the District and concerns developers were submitting speculative applications outside of strategic site allocations in the Local Plan at the same time
- support for a review of the White Paper as indicated by the new Secretary of State, though concerns over the number of what/ifs in a possible impending review
- support for options 1 and 2 as both kept the process moving forward, and for some of the studies indicated in the report that it would be useful to undertake regardless of the planning system eventually adopted
- clarification whether it was full plan preparation or an extension of five years to the existing plan that was sought, and if an extension of five years then the Local Plan would be out of date by the time of adoption which would be a waste of time and money
- the need to sort out the issues with the current Local Plan first to avoid these being carried over into a new Local Plan
- the additional housing a review of the existing Local Plan would add under the current planning system, suggestions this could be as much as 5,000-8,000 new homes over the 5 years the plan would have to be extended by
- the intention of Government to give Councils stronger powers to enforce 'build out'
- the current 'out-of-control' position of having to accept planning applications wherever they may be, and even inviting them due to land supply issues
- whether Committee could make decisions based upon assumptions of what future planning rules may be, and whether it would be better to bring this report back in a few months times once more is known about how the Government is progressing with its plans
- statements and responses by the Secretary of State being material considerations in planning applications
- if option 3 were the preferred option of the Committee, the need to review the situation in six months times
- whether the possible lifting of the Local Land Supply would apply to the current Local Plan, and if this would be accompanied by the removing of the Housing Delivery Test which has also been problematic
- the need for the evidence base generated from the proposed list of studies in the report to deal with issues such as the climate emergency, and whether the option to pause could be explored down the line depending the outcome of the research

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Councillor Hughes moved a motion that Option 3, that the Plan be paused, be put to the Committee as its preferred option due to knowing the planning reforms were going to change and therefore be unable to continue working towards AND that it be reviewed in six months time. This was seconded by Councillor Clayden. Following a vote of the Committee, the motion was declared CARRIED.

The Planning Policy and Conservation Team Leader provided Members with answers to all points raised during the debate and stressed the risks involved in each option, many already known and set out in the report, but that a direction of travel was needed by Officers from the Committee.

The substantive recommendations were then proposed and seconded.

The Committee

RESOLVED

That the Local Development Scheme and Statement of Community Involvement be reported back to the next Committee meeting.

The Committee

RECOMMEND TO FULL COUNCIL

Option 3 to pause the preparation of a revised Local Plan until details of the new plan making system be agreed, and that the pause be reviewed in six months' time.

339. DEVELOPMENT MANAGEMENT POLICIES ENGAGEMENT FEEDBACK

Upon the invitation of the Chair, the Planning Policy and Conservation Team Leader presented his report which provided an update on engagement work on the draft list of Development Management Policies identified for potential review.

One Member paid tribute to the contributions of parishes to this process and the comments made, and also highlighted the Environment Agency's comment regarding a possible rise in temperature of 3-4% by the end of the century as demonstrating the scale of the challenge faced and how the Council must take this seriously.

The recommendation was then proposed and seconded.

The Committee

RESOLVED

To consider the feedback received and agree the report be used to inform future plan making.

340. WEST SUSSEX TRANSPORT PLAN 2022-2036 CONSULTATION

(At the beginning of the item, Councillor Elkins declared a Personal Interest as a Member of West Sussex County Council.)

Upon the invitation of the Chair, the Planning Policy and Conservation Team Leader presented his report which sought agreement for its content to form the basis of a formal response from the Council to the West Sussex Transport Plan 2022-2036 Consultation.

Members (and one non-Committee Member) then took part in a full debate on the item where a number of points were raised including:

- acknowledgement in the report that Arun was the most densely populated part of the County
- the need for road improvements between Bersted to Chichester, in the short rather than the medium term, and Pagham Road
- the need to include the journey time between Angmering and Horsham by train which involved a change at Barnham
- the need for the Arundel Chord railway
- references to viable transport alternatives to the car and the Arun Active Travel Study but no mention of a school bus programme which would be a big step to reducing congestion and carbon emissions
- the need for a bridge west of Ford Station and a A27/A259 link opening up the possibility of development in the Ford area
- previous Section 106 contributions having been declined by Highways England that could have contributed to these improvements
- concern over the ordering of priorities and fears that once the roads had been built there would not be any money left for any of the other improvements, that the Transport Plan would therefore not meet its objectives of de-carbonising transport and did not demonstrate how targets would be achieved
- the need for the formal response to contain stronger wording to reflect the seriousness of the situation and the Council's concerns

The Planning Policy and Conservation Team Leader provided Members with answers to all points raised during the debate.

The recommendation was then proposed and seconded.

The Committee

RESOLVED

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

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341. DUTY TO COOPERATE - STATEMENT OF COMMON GROUND BETWEEN HORSHAM DISTRICT COUNCIL AND ARUN DISTRICT COUNCIL

Upon the invitation of the Chair, the Planning Policy and Conservation Team Leader presented his report which sought Members' agreement that the Chair of Planning Policy Committee be authorised to sign the joint Statement of Common Ground with Horsham District Council.

The recommendation was 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 Horsham District Council.

342. WORK PROGRAMME

The Planning Policy and Conservation Team Leader noted that decisions made at the meeting would impact future projects currently appearing on the Work Programme so some work would need to be undertaken to update it. One Member suggested the possibility of including the Outside Body reports that were expected from Members at future meetings. After discussion, the Committee noted the Work Programme.

(The meeting concluded at 8.47 pm)

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 30 NOVEMBER 2021

REPORT

SUBJECT: To 'make' the Barnham and Eastergate Neighbourhood Development Plan (Review) 2019-2031

REPORT AUTHOR: Donna Moles, Senior Planning Officer
DATE: 2 November 2021
EXTN: 37697
AREA: Planning Policy

EXECUTIVE SUMMARY:

The Barnham and Eastergate Neighbourhood Development Plan 2019-2031 passed Examination in October 2021. The Examiner of this modified Plan concluded that the Plan passed the Examination and that the material modifications do not change the nature of the Plan and it does not require a Referendum so should proceed to be 'made'.

This 'making' of the plan will give it legal force and it will form part of the statutory Development Plan for that area. Consequently, decisions on planning applications in the neighbourhood area will need to be made in accordance with the Neighbourhood Development Plan, unless material considerations indicate otherwise.

RECOMMENDATIONS:

That the Planning Policy Committee recommends to Full Council that:

- 1) It 'makes' the Barnham and Eastergate Neighbourhood Development Plan 2019-2031 and it becomes part of the Development Plan for Arun District Council.

1. BACKGROUND:

1.1 The Localism Act, which received Royal Assent on November 15 2011, introduced new rights and powers to allow local communities to shape new development by coming together to prepare Neighbourhood Plans and Orders. Neighbourhood forums and Parish Councils can use new Neighbourhood Planning powers to establish general planning policies for the development and use of land in a neighbourhood. These are described legally as 'Neighbourhood Development Plans'. They must meet a number of conditions before they can be put to a community referendum and legally come into force. These conditions are to ensure plans are legally compliant and take account of wider policy considerations (e.g. national policy).

1.2 Under the Town and Country Planning Act 1990 (as amended), the Local Planning Authority has a statutory duty to assist communities in the preparation of

Neighbourhood Development Plans and Orders and to take Plans through a process of examination and referendum. The Localism Act 2011 (Part 6 chapter 3) sets out the Local Planning Authority's responsibilities under Neighbourhood Planning.

1.3 The Barnham and Eastergate Neighbourhood Development Plan relates to the area that was designated by Arun District Council as a neighbourhood area on 29th November 2012. This area is coterminous with the Barnham and Eastergate Parish Council boundary that lies within the Arun District Council Local Planning Authority Area.

1.4 The Barnham and Eastergate Neighbourhood Development Plan was examined by Mr Christopher Lockhart-Mummery QC, who passed the Plan and recommended Arun District Council should, subject to the modifications in the Examination report, proceed to be 'made' by Arun District Council. Following this, all the Examiner's modifications were agreed by Barnham and Eastergate Parish Council and Arun District Council (under delegated regulations explained at the meeting in June). Therefore, the need for this matter to come to Planning Policy Committee before Full Council is only on this occasion, as the constitutional amendments to Committees terms of reference to remove this function has not yet been completed.

2. PROPOSAL(S):

2.1 There are 3 types of modification which can be made to a neighbourhood plan or order. The process will depend on the degree of change which the modification involves:

- Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.
- Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.
- Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

2.2 Whether modifications change the nature of the plan is a decision for the independent examiner. The examiner will consider the nature of the existing plan, alongside representations and the statements on the matter made by the qualifying body and the local planning authority. Where material modifications do not change the nature of the plan (and the examiner finds that the proposal meets the basic conditions or would with further modifications) a referendum is not required.

2.3 The Examiner concluded *'I have reached the clear conclusion that the proposed Modifications (whilst in most cases material) are not so significant or substantial as*

to change the nature of the NP. Policy H1 proposes three sites for housing, totalling 117 dwellings. This exceeds the LP non-strategic provision of 75 dwellings (although Site 3 (42 dwellings) has planning permission). Existing policy H1 contained provisions to meet the then emerging LP. Amended Policy H1 reflects the LP in its adopted form. This updating does not, in my view, change the nature of the Plan. In reaching this conclusion, I have compared the entire Made Plan with the entire NP2.’ ‘I accordingly Recommend that ADC makes NP2 subject to the above further Modifications’. (extracts from the examiner’s report – paras 30 and 52 respectively).

3. OPTIONS:

1. To ‘make’ the Barnham and Eastergate Neighbourhood Development Plan 2019-2031 to become part of the Development Plan for Arun District Council.
Or
2. To not ‘make’ the Barnham and Eastergate Neighbourhood Development Plan 2019-2031 which would not become part of the Development Plan for Arun District Council.

4. CONSULTATION:

Various rounds of consultation has been undertaken as part of the Neighbourhood Plan process.

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council	x	
Relevant District Ward Councillors	x	
Other groups/persons (please specify) The community, Statutory bodies and relevant stakeholders as per the regulations	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:

Once ‘made’, the Barnham and Eastergate Neighbourhood Development Plan will become part of the Development Plan for the District and will be used by the Council when determining planning applications for this area.

7. REASON FOR THE DECISION:

Arun District Council as the Local Planning Authority under section 61E(4) of the 1990 Act, needs to bring a Neighbourhood Development Plan into force.

8. BACKGROUND PAPERS:

The web link provides the full information for the Plan and background of the Plan
[Barnham and Eastergate neighbourhood development plan 2 | Arun District Council](#)

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 30 NOVEMBER 2021

REPORT

SUBJECT: 'First Homes' Policy

REPORT AUTHOR: Kevin Owen, Planning Policy Team Leader
DATE: 18 October 2021
EXTN: x 37853
AREA: Planning

EXECUTIVE SUMMARY:

This report asks Members to recommend that Full Council agree a proposed approach to implementing the Government's 30% 'First Homes' policy as part of the affordable housing tenure mix in Policy AH SP2 Affordable Housing and Policy H DM1 Housing Mix.

RECOMMENDATIONS:

That Planning Policy Committee: -

1. Recommends to Full Council the proposed approach to accommodating the Government's 'First Homes' policy requirement, as part of the Affordable Housing tenure mix provision in Arun, as set out in section 1.12 and Appendix 1 of the report and that it should be published as an interim policy statement on the Council's web site.

1. BACKGROUND:

- 1.1 The Government initially consulted on its proposals to introduce a 'First Homes' policy in February/May 2020 publishing a response to that consultation on 6 August 2020. The 'First Homes' policy is intended to ensure that a proportion of new homes are available to buy with a minimum discount of 30% below their full market value. This is to be provided as an affordable housing product delivered through the planning system (secured via S.106 contributions).
- 1.2 Subsequently, on 24 May 2021, the Government published a Written Ministerial Statement (WMS) together with Planning Practice Guidance (PPG) setting out national planning policy for the new affordable housing product, so that it could be provided through the planning system from 28 June 2021, before becoming a requirement for planning applications from 28 December 2021 (or 28 March 2022 if there has been significant pre-application discussions).

- 1.3 The WMS and PPG set out definitions and criteria for the application of 'First Homes' policy which include arrangements for ensuring the product is sold to people who meet the local eligibility criteria and that the discount and other restrictions are passed on to successors in title (secured though s.106 and model legal restriction on title via the land registry).
- 1.4 After the 30% discount has been applied, a price cap has been set on the first sale at £250,000 (£450,000 in Greater London) per unit and the discounted market tenure should account for at least 25% of the affordable housing units delivered by developers through planning obligations. Open market value will be determined via by a registered valuer.
- 1.5 The price cap and discount cannot be changed except through plan making where local evidence clearly demonstrates the need and in those circumstances the former can only be lowered and latter increased.
- 1.6 The Adopted Arun Local Plan includes the following policies:-
 - **H DM1 Housing mix** – which seeks a balanced mix of affordable and market housing on site of 11 dwellings or more with the tenure mix being negotiated on a case-by-case basis taking necessary viability considerations and the most up to date version of the SHMA into account;
 - **AH SP2 Affordable housing** – which requires a minimum of 30% affordable housing on or off site for developments of 11 or more units (subject to viability) and a tenure mix of 75% rent and 25% intermediate housing.
- 1.7 The Government expect the 25% 'First Homes' policy quota to be delivered on a cost neutral basis within the adopted Local Plan affordable housing policy and for the full policy discount to continue to be secured. This means that after securing the 'First Homes' quota, the remaining affordable housing mix should be secured across the remaining 75% and there should be no additional cost burden on developers. The Council should therefore have a policy that includes for First Homes but also makes it clear how the remaining 75% affordable housing will be delivered.
- 1.8 The National Planning Policy Framework 2021 also requires at least 10% of affordable housing provision to be for affordable home ownership (i.e. whether delivered as 'First Homes' or other forms of 'Intermediate Housing'). This is contained within the current policy requirement of 30%. To achieve this, in Arun it is proposed that the interim policy statement should specify that 33% of affordable provision should be 'Intermediate Housing' (i.e. 25% is 'First Homes' and 8% other Intermediate ownership products) and 67% rent.
- 1.9 The viability of the current Local Plan policies was established and tested via the plan making process and examination. First Homes is a policy requirement that the Government has imposed and the Council are obligated to accommodate it regardless of viability implications. The precise impact of the 'First Homes' policy will not be fully understood until further viability work is commissioned as part of the plan making process. However, the proposed interim policy statement (in paragraph 1.12 below) should help to minimise uncertainty and make it clearer how Arun expects planning applications to be compliant to the 'First Homes' policy and the adopted

Local Plan Affordable Housing policy mix by setting out the percentage mix required.

1.10 A further matter to consider in Arun is the impact of the 'First Homes' product on affordability. The Government's stated local eligibility criteria requires that the annual income (combined) of households should not exceed £80k (£90k in Greater London). Previous work on the product of Starter Homes (considered several years ago but abandoned by government), was examined in the then, emerging Arun Local Plan supporting evidence base - on housing need (i.e. the SHMA see Background paper 1) which suggested that average incomes for the target group of earners in Arun are under the age of 40 and is about £27.4k pa but that accessing a Starter Home would require an income of at least £44k (with a 20% discount and 10% deposit and 4 x income/mortgage multiple). This product would therefore, only accessible to a minority of the households aged under 40 that could access the private market without subsidy/assistance. The local affordability issue would clearly pose a similar barrier to accessing a 'First Home' (albeit Starter Homes were modelled on the basis of a 20% discount on the open market).

Is there a transition period for decision making?

1.11 The new 'First Homes' policy requirement does not apply for the following:

- Sites with full or outline planning permissions already in place or determined (or where a right to appeal against non-determination has arisen) before 28 December 2021.
- Applications for full or outline planning permission where there has been significant pre-application engagement which are determined before 28 March 2022; and
- Sites where local and neighbourhood plans are adopted/made under the transitional arrangements (as detailed in paragraphs 18 and 19 of the Planning Practice Guidance). These transitional arrangements will also apply to permissions and applications for entry-level exception sites.
- If an applicant wishes to amend a planning application to include 'First Homes' which is already submitted and likely to be granted before these dates, the local planning authority should be flexible in accepting 'First Homes' as an alternative type of tenure.

CONCLUSIONS

1.12 Arun District Council must set out how it will accommodate this policy through an interim policy statement and publish it on the Council's web site (until plan making resumes for the Local Plan update and the policy criteria can be viability tested). The interim policy statement is set out in Appendix 1 with examples and specifies that: 33% of the affordable provision should be 'Intermediate Housing' (i.e 25% First Homes and 8% other Intermediate ownership products) and 67% rent. This methodology will also be applied should developers and providers request to include 'First Homes' in advance of the transitional arrangements outlined above, subject to viability evidence and negotiation on the dwelling mix implications on a case-by-case basis.

2. PROPOSAL(S):		
2.1 That the Planning Policy Committee considers and agrees the report to publish and interim policy statement on 'First Homes'.		
3. OPTIONS:		
3.1 That the Planning Policy Committee considers and agrees the report or does not consider or agree the report.		
4. CONSULTATION:		
Has consultation been undertaken with:	YES	NO
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
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) Housing Services	X	
6. IMPLICATIONS:		
6.1 The national policy on 'First Homes' will impact on the application of the adopted Local Plan 2018 policies for Affordable Housing provision and tenure mix.		

7. REASON FOR THE DECISION:
7.1 In order to ensure that the policy is accommodated in an effective way which does not undermine delivery of viable housing schemes and securing affordable housing needs.

8. BACKGROUND PAPERS:
Background paper 1: Updated Housing Needs Evidence September 2016 https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n10221.pdf&ver=10142

Appendix 1: Arun Interim Affordable Housing Policy to Accommodate First Homes Policy

That: delivery of the 30% affordable housing required by Local Plan policy AH SP2 will be expected to comprise the following;

- 33% 'Intermediate Housing' (25% is 'First Homes' and 8% other Intermediate ownership products) and
- 67% rent as illustrated in the table with examples of different scales of development.

Worked Examples

		Affordable quota	Tenure Mix			
			First Homes replace Intermediate			NPPF
		Rounded	33%			10%
	Units	30%	25%	8%	67%	
			Intermediate		Affordable rent	
Scheme for 12 Dwellings	12	4	1	0	2	
The NPPF requires 10% of homes to be for affordable home ownership = 10% of 12 dwelling					Rounding up	1
Total		4	1	0	3	
Scheme for 50 Dwellings	50	15	4	1	10	
The NPPF requires 10% of homes to be for affordable home ownership = 10% of 50 dwelling						5
Total		15	4	1	10	
Scheme for 150 dwellings	150	45	11	4	30	
The NPPF requires 10% of homes to be for affordable home ownership = 10% of 150 dwelling						15
Total		45	11	4	30	

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ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 30 NOVEMBER 2021

REPORT

SUBJECT: Drainage and Wastewater Management Plan (DWMP) Consultation

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

EXECUTIVE SUMMARY:

Southern Water are in the process of preparing the first Drainage and Wastewater Management Plan (DWMP) and have reached the early scoping consultation stage. A full formal public consultation on the DWMP will be undertaken in the summer 2022.

This report seeks agreement that the provisional comments summarised in this report (fully amplified in the officer provisional letter of response sent by the due deadline Appendix 1) and any other matters raised by members forms the basis for the Council's response to the documents published for consultation from 21st September to midnight on 26th October.

RECOMMENDATIONS:

That Planning Policy Committee:-

1. Agrees the comments set out in sections 1.7 and 1.8 of this report (including Appendix 1) together with any other matters raised by members, as the basis for Arun District Council's formal response to the consultation.

1. BACKGROUND:

- 1.1 South Water are in the process of creating their first Drainage and Wastewater Management Plan (DWMP). DWMPs are intended to be long term plans, spanning 25 years or more, that provide the opportunity to improve water quality and drainage systems and reduce flooding and pollution to their customers, communities, businesses, and environment.
- 1.2 As part of the consultation Southern Water have also published Planning Objectives, Risk Based Screening, Baseline Risk and Vulnerability Assessment (BRAVA), Problem characteristics, Option Development and Appraisal, Technical Summaries,

and a Sustainability Appraisal Scoping Report document on the web site alongside the DWMP document.

- 1.3 Arun District has 3 drainage systems that are included within the Arun and Western Streams catchment, i.e. Lidsey, Ford and Pagham. Officers attended workshops with Southern Water and other stakeholders on 28th and 30th September and then 19th October.
- 1.4 At this early stage, the comments and feedback are intended to allow Southern Water to scope their methodology and evidence to be applied to preparing the DWMP and responses were invited by 26 October 2021 (officers therefore, set out a provisional letter of response by the deadline). There will be another formal full public consultation in the summer 2022 on the Draft DWMP itself.

Comments

- 1.5 The production of these plans is supported by the Council, especially considering the number of current and emergent issues that have been associated with the 3 systems within Arun District including overlap with neighbouring authorities.
- 1.6 The summarised response below follows the same order of the topic questions asked by Southern Water (and fully amplified in the officers attached provisional response letter at Appendix 1 to this item).
- 1.7 For ease, the main points are summarised below, against the topic headings:-

Problem characteristics

- While there is comment on existing issues, there is little clarification on when these are scheduled to be dealt with. This needs to be clearer in the documents produced. Connected with this, the current information does not provide certainty over whether these issues such as flooding from combined surface water and foul sewer incapacity (affecting existing coastal properties in Littlehampton and Bognor Regis) including consented storm overflows to sea (affecting bathing water), are only a temporary issue or will prevail longer term;
- Groundwater is a significant issue across most of Arun District. Consequently, it is the varying susceptibility levels to flooding from this source that are especially pertinent, in particular, within Lidsey catchment due to the surface water run-off from the chalk spring line of the Downs hitting the impermeable clay barrier in around Lidsey, Barnham, Elmer and other villages;
- Officers are acutely aware of the issues connected to nutrients and the Environment Agency's (EA) call for water neutrality in neighbouring areas to protect sensitive habitats and eco systems (e.g Chichester Harbour and Arun Valley SPA). It is encouraging that this has been recognised and added to the planning objectives for those areas but the Council wishes to remind Southern Water that, although these areas are not within Arun's planning authority area, there are hydrological links to and from those designated sites (e.g. Arun Valley). Arun is also aware that the EA has yet to assess the state of Pagham Harbour SPA from this perspective. Arun does not therefore wish to be in a position where it is the only Council in the sub-region not able to demand higher drainage and foul sewer standards, simply due to its administrative area. Arun

urges that a more comprehensive and strategic approach is taken to this at the wider cross catchment level and guidance be issued to reflect this.

Option Development and Appraisal

- There is a need to ensure that modelling is using and based on the sea level rise, river flows and rainfall intensity allowances issued by the Environment Agency in July 2021;
- A consistent and co-ordinated methodology needs to be applied when calculating Dry Water Flows (DWF) based on a comprehensive database of known, planned and unplanned developments in order to determine corresponding headroom capacity for discharge consents. The methodology must look across authority boundaries to fully account for cumulative impacts. This is most pertinent to Pagham Harbour as the administrative boundary goes through the centre of the harbour, affecting access and monitoring;
- It is strongly urged that guidance is produced and strongly enforced for the design details of foul drainage in areas where the groundwater is high, to be a rigorous standard in order to prevent further infiltration. It is hoped that doing this would begin to address the existing problem characteristics in the Lidsey system;
- In terms of option development, it is recommended that consideration is given to the recommissioning of redundant assets e.g. for pumping, treatment or storm water storage and the scope those disused assets may offer for short to intermediate term solutions for the current and emergent problems;
- It is suggested that a full assessment of the risks posed by climate change be taken into account, especially looking at the role and location of existing assets related to sustainable growth locations and whether larger scale consolidation/augmentation or relocation maybe needed for any assets. This maybe especially pertinent to the Manhood Peninsula and coastal locations once the impact of climate change coastal flooding and any erosion is accounted for;
- The Council urges a more holistic and strategic approach be investigated including objectives that decarbonise the WwTW infrastructure in terms of renewable energy and in particular the scope for tidal and in particular, pumped water storage on an inter-catchment basis, including looking at both the South Downs National Park and the coastal plain, including river Arun given the urgency of the climate emergency;
- Similarly, the Council would wish to see that there is consideration of the scope for larger scale – i.e. catchment or landscape scale, nature-based solutions, that may be appropriate for any specific locations in Arun or the connected catchments. If found appropriate through further stages and refinement, then a mechanism for coordinated engagement with all relevant stakeholders (e.g. local authorities and developers or land promoters) should be prioritised and reflected in the investment programme in order to align other documents or plans.

Investment Programme

- It is appreciated that there is not going to be one single solution to addressing wastewater infrastructure but rather a combination of measures will be needed however, the Council consider that the specific objectives of the DWMP for Arun

<p>should be considered as a priority for investment within Arun District.</p> <ul style="list-style-type: none"> • There should be clear direction provided over the appropriate roles and actions to be taken by each party during the further DWMP work with respect to addressing the high groundwater level and susceptibility to groundwater flooding across Arun District; • A clear set of comprehensive documents need to be issued on wider strategic issues that affect the whole region, such as that of nutrient neutrality, particularly nitrates although phosphates and others that also apply. The Council do not wish to be left as the only area not being able to apply high standards when all neighbouring areas are being required to do so. This would also be counter to the Council's overall priorities to address the climate emergency declared in January 2020 and the intention to raise standards of new developments wherever possible. 																	
<p>CONCLUSIONS</p> <p>1.8 Arun District Council welcomes the opportunity to comment on the DWMP. This report sets out the Council's proposed response (amplified in the officers' provisional response letter Appendix 1) together with any further points member wish to make.</p>																	
<p>2. PROPOSAL(S):</p> <p>That the Planning Policy Committee agrees the comments set out in paragraph 1.7 and 1.8 of the report as the basis for the Council's formal response to the DWMP consultation.</p>																	
<p>3. OPTIONS:</p> <p>8.1 That the Planning Policy Committee:-</p> <p>a) agreed the response or</p> <p>b) the response is not agreed.</p>																	
<p>4. CONSULTATION:</p> <table border="1"> <thead> <tr> <th>Has consultation been undertaken with:</th> <th>YES</th> <th>NO</th> </tr> </thead> <tbody> <tr> <td>Relevant Town/Parish Council</td> <td></td> <td>x</td> </tr> <tr> <td>Relevant District Ward Councillors</td> <td></td> <td>x</td> </tr> <tr> <td>Other groups/persons (please specify) Environment & Neighbourhoods (Engineers)</td> <td>x</td> <td></td> </tr> </tbody> </table>			Has consultation been undertaken with:	YES	NO	Relevant Town/Parish Council		x	Relevant District Ward Councillors		x	Other groups/persons (please specify) Environment & Neighbourhoods (Engineers)	x				
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Relevant District Ward Councillors		x															
Other groups/persons (please specify) Environment & Neighbourhoods (Engineers)	x																
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	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:

This response will inform the progression of the DWMP, which should ultimately identify areas where investment should be focused for improvement of the drainage and wastewater network, which will help to secure existing and future property and assets from the risks of flooding arising from development and climate change.

7. REASON FOR THE DECISION:

The Council needs to respond to a public consultation by Southern Water to ensure that all concerns and issues connected with the sewerage, drainage and water supplies currently and in the future are accounted for and addressed in infrastructure planning needed for existing customers and future customers in Arun.

8. BACKGROUND PAPERS:

Background Paper 1: DWMP consultation

[Arun and Western Streams catchment DWMP \(southernwater.co.uk\)](https://www.southernwater.co.uk/arun-and-western-streams-catchment-dwmp)

Appendix 1: Officer response letter

DWMP Team, Southern House
Yeoman Road
Worthing
West Sussex
BN13 3NX

Tel: 01903 7373853

Fax:
DX: 57406
Littlehampton
Minicom: 01903 732765



e-mail: kevin.owen@arun.gov.uk

26th October 2021

Please ask for: Kevin Owen

Your Ref: "[Your Ref]"

Our Ref: DWMP Autumn 2021

Dear DWMP Team

RE: DWMP Consultation

Thank you for the opportunity to respond to the consultation on the Drainage and Wastewater Management Plan (DWMP). It is understood that this is intended to be the longer term strategic plan covering drainage, wastewater and environmental water quality and the comments that are provided in this letter are given in this vein.

Officers from the Council's planning policy and engineering teams attended workshops on 28 and 30th September and the 19th October, related to the 3 specific drainage catchments or systems within the District. It is hoped that the input made at these is captured along with this informal response letter in the further development of these plans (this letter is a provisional response subject to confirmation after 30 November). The letter addresses the issues in order of the consultation questions subject matter.

It is appreciated that the 14 planning objectives used are based on those set by Water UK, which were then supplemented i.e. Nutrient Neutrality, and it is appreciated that all 3 works within Arun District have been identified through the screening and BRAVA exercises to require improvements. However, the Council does have some concerns over the reasons behind these, as set out in this letter.

Problem characterisations

The most obvious point on this aspect is how little the existing issues are dealt with i.e. flooding and discharges at outfalls, including lack of urgency/clarity on when these are scheduled to be dealt with. The approach merely identifies the standards that have been set and consequently, the standard that will be applied. This does not explain the reasons or assumptions behind these to give any confidence that the specific issues will be resolved. An obvious example has been the recent discharges at the outfalls, from the Consented Storm Water Overflows in the Littlehampton area and why these were so significant. It is not obvious from the content of the existing documents to provide certainty that this was temporary and will not continue in the future. Repeated internal flooding of basements at properties along South Terrace, Littlehampton occurs but does not seem to have been picked up. The issue of impact on bathing water both at Bognor Regis and at Littlehampton is a current issue which was acknowledged in the workshops. The solutions or remedies are difficult because of the range of factors which impact – however, Arun District Council would urge that specific solutions be found in the short and intermediate term.

Groundwater is a significant issue for Arun District not fully explained by its topography, with only 3 small areas of the District not affected by this. Attention should therefore, be given to the relative variance of susceptibility of flooding from this source. For example, this variance is specifically known to be high across a large proportion of the area and significantly impacts the Lidsey area. The information relating to this can be seen within the Arun SFRA Update 2016 Appendix F¹. Due to this characteristic, it is not fully understood why planning objectives 4 and 7 (in the short term) have not been classed as very significant for all the systems within Arun District. The Lidsey system in particular has had long standing historical problems not just any that may be anticipated in the future. This is particularly relevant when inundation is so prominent in Arun resulting from the impact of the run-off from the chalk spring line (e.g. South Downs) onto the impermeable clay around Lidsey, Barnham, Elmer and other villages. More detailed discussion on the exact issues for this area can be found in the Lidsey SWMP and the associated ones around Elmer can be found in the Elmer SWMP.

Although not a currently a direct issue for any of the systems within Arun, officers are acutely aware of the emergent issues around nutrients and water neutrality that neighbours are facing. While it is encouraging that nutrient neutrality has been recognised and added to the planning objectives, Southern Water are reminded that there are designated sites (e.g. Arun Valley SPA), which partially overlap with the Arun District area which are hydrologically and cumulatively linked to the planning authority area. The Council is therefore, deeply concerned at being the only sub-regional area not to have the ability to demand the required water neutrality standards through planning decisions through default, purely based on the boundaries of the relevant catchment. Arun District Council would therefore, urge that a comprehensive coordinated and cumulative approach be applied to this topic in Arun going forward with policy solutions and recommendations.

Option Development and Appraisal

As was raised within the workshops, there is a need to ensure that the modelling and forecasting reflect the latest EA sea level projection, peak river flow and rainfall intensities at the relevant catchment and medium ranges, unless otherwise advised by the Agency.

The Council would wish to see a consistent and coordinated methodology applied across all systems and catchments to the establishment of development headroom within connected planning authority areas. This should clarify the impacts on and of Dry Water Flow calculations, using a comprehensive database of existing, planned and unplanned developments to establish headroom for discharge consents. It must be emphasised that this must go across local authority boundaries to fully account for the cumulative impacts of development. This is particularly important when focusing on Pagham Harbour where the authority boundaries cut through the middle of it and includes associated issues such as the location of water quality testing or access. To this extent, Arun officers would like to meet with you to discuss setting up a liaison meeting to refresh and update the previous Statement of Common Ground (2017)² – as Southern Water have similarly been coordinating with Chichester District Council and the Environment Agency.

Linked to this the Council wish for more guidance to be produced and strongly enforced (e.g. to ensure robust construction of foul drainage connections where the groundwater is high) to prevent future infiltration, which is a significant issue for a large proportion of Arun District as covered above. Additional to this, tide locking and high water levels will mean that certain solutions (e.g. extra storage via SUDs) may not always be appropriate in their present form or standard requiring other solutions or standards to be identified and proposed.

For overall development of options, it is recommended that to address some of the problem characteristics, consideration be given including the role of recommissioning redundant plant/equipment and infrastructure for pumping, treatment or storm storage and short to intermediate term remedies. It seems that there are assets that could potentially be reused in an active way to help towards some solutions.

¹ <https://www.arun.gov.uk/flood-risk-planning-policy>

² <https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n15993.pdf&ver=16505>

It is suggested that a full assessment of the risks posed by climate change be taken into account, especially looking at the role and location of existing assets related to sustainable growth and whether larger scale consolidation/augmentation or relocation maybe needed for any assets. This may be especially pertinent to the Manhood peninsula and/or coastal locations once the impact of climate change coastal flooding and any erosion is accounted for.

In particular, it is evident in Arun that a combination of ground water flooding susceptibility and tidal water tables limit the current scope of SUDs to attenuate flooding and surface /ground water infiltration in their current form. The council urges a more holistic and strategic approach be investigated including objectives that decarbonise the WwTW infrastructure in terms of renewable energy and in particular the scope for pumped water storage on a inter-catchment basis looking at the South Downs National Park and coastal plain including river Arun. Manmade water bodies, uphill in the Downs must be feasible option provided that sensitive landscape considerations are accommodated given the urgency of the climate emergency.

Similarly, the Council would wish to see that there is consideration of the scope for larger scale – i.e. catchment or landscape scale – nature based solutions, that may be appropriate for any specific locations in Arun or the connected catchments. If found appropriate through further stages and refinement, then a mechanism for coordinated engagement with all relevant stakeholders (e.g. local authorities and developers or land promoters) should be prioritised and reflected in the investment programme in order to align other documents or plans.

Investment Programme

It is appreciated that there is not going to be one simple solution required but a combination throughout each, however the Council consider all of the objectives of the DWMP should be considered as a priority for investment within Arun District, as is detailed through the above points in addition to the existing designation of 'Improve' for each of the systems (Ford, Lidsey and Pagham) falling in the district.

As signalled under comments on the Option Development and Appraisal section above, the Council would wish more work to be done on responses to proposals for connection to the systems, along with guidance and specifically enforcement of high standards for design details to ensure robust construction of foul drainage in areas with high groundwater to prevent future infiltration. This can be achieved in short term through direction towards existing information that is available from West Sussex County Council (WSCC) and the Districts and Boroughs. This could then be addressed more comprehensively through the creation of stand-alone or coordinated documents with WSCC or respective authorities that can be used in determining applications as material considerations until entrained in Supplementary Planning Documents following plan making and testing at examination.

The issue of the high groundwater level and associated high susceptibility to groundwater flooding will be essential during the detailed work on solutions for those systems in Arun District. There should be clear direction provided over the appropriate roles and actions to be taken by each party.

Finally, a clear set of comprehensive documents need to be issued on wider strategic issues that affect the whole region, such as that of nutrient neutrality, particularly nitrates although phosphates and others also apply. The Council do not wish to be left as the only area not being able to apply high standards when all it's neighbours are being required to apply such. This would also be counter to the Council's overall priorities to address the climate emergency declared in January 2020 and the intention to raise standards of new developments wherever possible.

Overall in summary, Arun District feel that:

- there needs to be greater content on the existing issues and how and when these are to be dealt with;
- consistency in the methodology used (climate change allowances and DWF calculations);
- significantly greater enforcement of high design details for the robust construction of foul drainage in areas of high groundwater;
- possible recommissioning of redundant assets;

- identify where natural solutions would be expected to occur and engage with all needed in their development; and
- believe there should be investment in the production of standalone or coordinated guidance documents.

I would be grateful if you could contact me at kevin.owen@Arun.gov.uk or phone 07908919397 in order to coordinate possible meeting dates (for the purposes set out and underlined above under 'Option Development and Appraisal') week beginning 8 November.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'K Owen', written in a cursive style.

Kevin Owen (Team Leader Planning Policy & Conservation)

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 30 NOVEMBER 2021

REPORT

SUBJECT: Local Plan Evidence Update Report

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

EXECUTIVE SUMMARY:

This report will update members on the remaining evidence position - on whether any further studies to those already committed, should be commissioned should they not be affected by planning reforms (following the Planning Policy Committee 6 October meeting which agreed under the 'Arun Local Plan Update' item, to recommend Option 3 to Full Council i.e., to pause plan making).

RECOMMENDATIONS:

That Planning Policy Committee:-

1. Agrees the conclusion in section 1.5 of the report as the basis for work programming the pending evidence studies.

1. BACKGROUND:

- 1.1 The Planning Policy Committee considered the 'Arun Local Plan Update' report on 6 October 2021 and agreed to recommend Option 3 to Full Council i.e. to pause the Local Plan preparation pending the signalled planning reforms set out in the Planning bill progressing through Parliament. The situation was to be kept under review and a report back to be made in May 2022. However, members also asked that the list of pending studies (i.e. those not already commissioned or committed) be further reviewed to see whether any would need commissioning because they would be unaffected by planning reform, and to report back to the next meeting (30 November 2021).
- 1.2 The list of pending studies is set out below together with a commentary on whether they could be commissioned independently of planning reform:-

Table 1: Pending Studies

Sustainability Regulation Assessment	Appraisal/Strategic Assessment	Environmental Appraisal/Habitats
<ul style="list-style-type: none"> • Planning reform? Unlikely – the European Directive is enshrined in UK law – although the mechanics of SA/SEA and HRA may need to adapt to any new planning system which may potentially require enabling regulations • Commissioning is, however, dependent on Housing Numbers and spatial distribution in order to scope reasonable alternatives and assess objectives and policy responses. • Conclusion – commissioned when plan making resumes. 		
Placemaking Study (20 minute communities)		
<ul style="list-style-type: none"> • Planning reform? Spatial policy and place making is likely to be significantly affected by planning reform and the currently proposed zoning of land for growth, regeneration or protection. • Commissioning is, however, dependent on Housing Numbers and spatial distribution e.g. to test the density and scope for modal shift of proposed new development sites in terms of access to community services leisure and jobs via transport, walking and cycling within 20 minutes. • Conclusion – commissioned when plan making resumes. 		
Housing Economic Development Needs Assessment (HEDNA) Study		
<ul style="list-style-type: none"> • Planning reform? The proposed nationally proscribed formula (i.e. the Standard Housing Methodology or SHM) for establishing Objectively Assessed Need is likely to be significantly affected by planning reform and consequent the scope for local authority testing of the components of population change, households and need for employment may become significantly constrained. • Commissioning the HEDNA based on the Standard Housing Method would risk subsequent abortive work. • Conclusion – commissioned when plan making resumes. 		
Arun Transport model Phase 2		
<ul style="list-style-type: none"> • Planning reform? Transport Model methodology is unlikely to be significantly affected by planning reform. • Commissioning the Transport Model phase 2 to assess the distribution of development options and mitigation packages on the transport network is, however, dependent on housing and employment numbers to be included over a plan period and is therefore, sensitive to the proposed plan timetable such that commissioning would not be justified or feasible. • Conclusion – commissioned when plan making resumes 		
Strategic Flood Risk Assessment (SFRA)		
<ul style="list-style-type: none"> • Planning reform? Strategic Flood Risk Assessment (SFRA) methodology is unlikely to be significantly affected by planning reform. • Commissioning the SFRA involves establishing the climate change allowances (using coastal, peak rainfall and river flows) prescribed by EA and mapping as flood risk contours for the flood zones (i.e. 1, 2a, 3a and 3b) for intervals up to 100 years (i.e. the lifetime of development). This mapping resource is then used to undertake sequential and exceptions test for plan making with level 1 SFRA site assessment and subsequently the spatial distribution of growth. The SFRA is also to be used for Development 		

	<p>Management decision making with detailed site level SFRA sequential and exceptions testing.</p> <ul style="list-style-type: none"> • Conclusion – it is feasible to undertake the base mapping work for SFRA as a separate earlier phase from the sequential testing. This work should be able to be commissioned therefore, in two phases with phase 2 sequential testing of development options postponed until plan making resumes.
	Active Travel Study
	<ul style="list-style-type: none"> • Planning reform? Unlikely to be significantly affected by planning reform. • Commissioning phase 2 is dependent on testing any new spatial distribution of additional housing numbers in order to identify appropriate active travel mitigation infrastructure. • Conclusion – commissioned when plan making resumes.
	Retail Study
	<ul style="list-style-type: none"> • Planning reform? Unlikely to be significantly affected by planning reform. • Commissioning phase is dependent on testing housing numbers in order to identify future demand for convenience and durable floorspace against existing and planned floorspace turnover. • Conclusion – commissioned when plan making resumes.
	Landscape Study
	<ul style="list-style-type: none"> • Planning reform? Unlikely to be significantly affected by planning reform. • Commissioning is dependent on testing housing numbers and distribution in order to identify sensitive landscapes for protection and mitigation measures required to accommodate development. • Conclusion – commissioned when plan making resumes.
	Heritage and Conservation Area studies
	<ul style="list-style-type: none"> • Planning reform? Unlikely to be significantly affected by planning reform. • Commissioning is dependent on the need to update or define new areas for heritage conservation through working with local communities and Parishes (including though Neighbourhood plan making) in response to development and change. • Conclusion – commissioned as and when required.
	Infrastructure Development Plan
	<ul style="list-style-type: none"> • Planning reform? The planning reforms propose to address infrastructure provision through a National Infrastructure Levy replacing local Community Infrastructure Levies and so there may be significant changes in the way that infrastructure requirements are identified and funded via development. • Commissioning is dependent on testing the housing numbers and distribution in order to identify necessary infrastructure provision for mitigating the impacts of development. • Conclusion – commissioned when plan making resumes.
	Viability Study
	<ul style="list-style-type: none"> • Planning reform? Similar to above, with a National Infrastructure Levy, there may be significant funding changes. This includes the proposed nationalisation of many development management policy standards (e.g. sustainable design, energy efficiency and carbon reduction) aimed at mitigating the impact of development. • Commissioning is dependent on testing the housing numbers and

	<p>distribution in order to identify the deliverability and viability of infrastructure requirements and any policy mitigation of the impacts of development.</p> <ul style="list-style-type: none"> • Conclusion – commissioned when plan making resumes.
	<p>1.3 It is concluded that there are only two potential areas where work on commissioning evidence supporting plan making can continue – specifically SFRA phase 1 mapping and ongoing heritage and conservation work on a need's basis.</p> <p>1.4 It should also be recognised that the meeting on 6 October 2021 included discussion of other relevant topic issues that would need to be addressed in order for plan making to resume – this includes</p> <ul style="list-style-type: none"> • A27 capacity and Junction mitigation; • Wastewater Treatment Capacity and 'headroom'; • Water neutrality and • Housing Market Absorbtion. <p>These topics are considered essential to inform plan making given their impact on interrupting plan progress in neighbouring authorities and may require consultancy for elements of the work. Work has commenced with Southern Water on establishing a baseline for waste water capacity and water neutrality which will help to evidence infrastruture planning as well as the need for improved design standards for foul connections and water efficiency. Further engagment with Chichester District is also being programmed to understand the A27 capacity issues constraining growth with a view to reporting back to this committee over the next 6 months.</p> <p>1.5 Paragraph 1.13 and 1.14 of the report to Planning Policy Committee on 6 October 2021 referred to a number of Topic Papers that will be progressed over the coming months. It also referred to evidence in respect of Climate Chage, Active Travel and Biodiveristy that have already commenced.</p>
	<p>CONCLUSIONS</p> <p>1.6 That with the exception of SFRA phase 1 mapping and ongoing heritage and conservation work – there is no scope to commission the remaining evidence studies pending certainty around planning reforms including the need to know housing numbers for testing spatial strategy and mitigation of development through plan making and infrastructure provision.</p>
	<p>2. PROPOSAL(S):</p> <p>That the Planning Policy Committee notes the comments set out in Table 1 and sections 1.3 - 1.5 of the report.</p>
	<p>3. OPTIONS:</p> <p>8.1 That the Planning Policy Committee:-</p> <ol style="list-style-type: none"> a) agrees the report conclusion in section 1.5 or b) the report conclusion is not agreed.

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: <p>This report sets out the justification for the phasing of commissioning evidence studies (which has financial implications) to support plan making in order to ensure that new development and growth is sustainable.</p>		

7. REASON FOR THE DECISION: <p>The Council needs to ensure that it is undertaking the work to ensure that a resumption of plan making has a firm evidence base and procurement programme for evidence to prepare a 'sound' local plan under any future planning reforms.</p>
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8. BACKGROUND PAPERS: <p>None.</p>
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Appendix 1: Officer provisional response letter

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Worthing
West Sussex
BN13 3NX

Tel: 01903 7373853

Fax:
DX: 57406
Littlehampton
Minicom: 01903 732765



e-mail: kevin.owen@arun.gov.uk

26th October 2021

Please ask for: Kevin Owen

Your Ref: "[Your Ref]"

Our Ref: DWMP Autumn 2021

Dear DWMP Team

RE: DWMP Consultation

Thank you for the opportunity to respond to the consultation on the Drainage and Wastewater Management Plan (DWMP). It is understood that this is intended to be the longer term strategic plan covering drainage, wastewater and environmental water quality and the comments that are provided in this letter are given in this vein.

Officers from the Council's planning policy and engineering teams attended workshops on 28 and 30th September and the 19th October, related to the 3 specific drainage catchments or systems within the District. It is hoped that the input made at these is captured along with this informal response letter in the further development of these plans (this letter is a provisional response subject to confirmation after 30 November). The letter addresses the issues in order of the consultation questions subject matter.

It is appreciated that the 14 planning objectives used are based on those set by Water UK, which were then supplemented i.e. Nutrient Neutrality, and it is appreciated that all 3 works within Arun District have been identified through the screening and BRAVA exercises to require improvements. However, the Council does have some concerns over the reasons behind these, as set out in this letter.

Problem characterisations

The most obvious point on this aspect is how little the existing issues are dealt with i.e. flooding and discharges at outfalls, including lack of urgency/clarity on when these are scheduled to be dealt with. The approach merely identifies the standards that have been set and consequently, the standard that will be applied. This does not explain the reasons or assumptions behind these to give any confidence that the specific issues will be resolved. An obvious example has been the recent discharges at the outfalls, from the Consented Storm Water Overflows in the Littlehampton area and why these were so significant. It is not obvious from the content of the existing documents to provide certainty that this was temporary and will not continue in the future. Repeated internal flooding of basements at properties along South Terrace, Littlehampton occurs but does not seem to have been picked up. The issue of impact on bathing water both at Bognor Regis and at Littlehampton is a current issue which was acknowledged in the workshops. The solutions or remedies are difficult because of the range of factors which impact – however, Arun District Council would urge that specific solutions be found in the short and intermediate term.

Groundwater is a significant issue for Arun District not fully explained by its topography, with only 3 small areas of the District not affected by this. Attention should therefore, be given to the relative variance of susceptibility of flooding from this source. For example, this variance is specifically known to be high across a large proportion of the area and significantly impacts the Lidsey area. The information relating to this can be seen within the Arun SFRA Update 2016 Appendix F¹. Due to this characteristic, it is not fully understood why planning objectives 4 and 7 (in the short term) have not been classed as very significant for all the systems within Arun District. The Lidsey system in particular has had long standing historical problems not just any that may be anticipated in the future. This is particularly relevant when inundation is so prominent in Arun resulting from the impact of the run-off from the chalk spring line (e.g. South Downs) onto the impermeable clay around Lidsey, Barnham, Elmer and other villages. More detailed discussion on the exact issues for this area can be found in the Lidsey SWMP and the associated ones around Elmer can be found in the Elmer SWMP.

Although not a currently a direct issue for any of the systems within Arun, officers are acutely aware of the emergent issues around nutrients and water neutrality that neighbours are facing. While it is encouraging that nutrient neutrality has been recognised and added to the planning objectives, Southern Water are reminded that there are designated sites (e.g. Arun Valley SPA), which partially overlap with the Arun District area which are hydrologically and cumulatively linked to the planning authority area. The Council is therefore, deeply concerned at being the only sub-regional area not to have the ability to demand the required water neutrality standards through planning decisions through default, purely based on the boundaries of the relevant catchment. Arun District Council would therefore, urge that a comprehensive coordinated and cumulative approach be applied to this topic in Arun going forward with policy solutions and recommendations.

Option Development and Appraisal

As was raised within the workshops, there is a need to ensure that the modelling and forecasting reflect the latest EA sea level projection, peak river flow and rainfall intensities at the relevant catchment and medium ranges, unless otherwise advised by the Agency.

The Council would wish to see a consistent and coordinated methodology applied across all systems and catchments to the establishment of development headroom within connected planning authority areas. This should clarify the impacts on and of Dry Water Flow calculations, using a comprehensive database of existing, planned and unplanned developments to establish headroom for discharge consents. It must be emphasised that this must go across local authority boundaries to fully account for the cumulative impacts of development. This is particularly important when focusing on Pagham Harbour where the authority boundaries cut through the middle of it and includes associated issues such as the location of water quality testing or access. To this extent, Arun officers would like to meet with you to discuss setting up a liaison meeting to refresh and update the previous Statement of Common Ground (2017)² – as Southern Water have similarly been coordinating with Chichester District Council and the Environment Agency.

Linked to this the Council wish for more guidance to be produced and strongly enforced (e.g. to ensure robust construction of foul drainage connections where the groundwater is high) to prevent future infiltration, which is a significant issue for a large proportion of Arun District as covered above. Additional to this, tide locking and high water levels will mean that certain solutions (e.g. extra storage via SUDs) may not always be appropriate in their present form or standard requiring other solutions or standards to be identified and proposed.

For overall development of options, it is recommended that to address some of the problem characteristics, consideration be given including the role of recommissioning redundant plant/equipment and infrastructure for pumping, treatment or storm storage and short to intermediate term remedies. It seems that there are assets that could potentially be reused in an active way to help towards some solutions.

¹ <https://www.arun.gov.uk/flood-risk-planning-policy>

² <https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n15993.pdf&ver=16505>

It is suggested that a full assessment of the risks posed by climate change be taken into account, especially looking at the role and location of existing assets related to sustainable growth and whether larger scale consolidation/augmentation or relocation maybe needed for any assets. This may be especially pertinent to the Manhood peninsula and/or coastal locations once the impact of climate change coastal flooding and any erosion is accounted for.

In particular, it is evident in Arun that a combination of ground water flooding susceptibility and tidal water tables limit the current scope of SUDs to attenuate flooding and surface /ground water infiltration in their current form. The council urges a more holistic and strategic approach be investigated including objectives that decarbonise the WwTW infrastructure in terms of renewable energy and in particular the scope for pumped water storage on an inter-catchment basis looking at the South Downs National Park and coastal plain including river Arun. Manmade water bodies, uphill in the Downs must be feasible option provided that sensitive landscape considerations are accommodated given the urgency of the climate emergency.

Similarly, the Council would wish to see that there is consideration of the scope for larger scale – i.e. catchment or landscape scale – nature based solutions, that may be appropriate for any specific locations in Arun or the connected catchments. If found appropriate through further stages and refinement, then a mechanism for coordinated engagement with all relevant stakeholders (e.g. local authorities and developers or land promoters) should be prioritised and reflected in the investment programme in order to align other documents or plans.

Investment Programme

It is appreciated that there is not going to be one simple solution required but a combination throughout each, however the Council consider all of the objectives of the DWMP should be considered as a priority for investment within Arun District, as is detailed through the above points in addition to the existing designation of 'Improve' for each of the systems (Ford, Lidsey and Pagham) falling in the district.

As signalled under comments on the Option Development and Appraisal section above, the Council would wish more work to be done on responses to proposals for connection to the systems, along with guidance and specifically enforcement of high standards for design details to ensure robust construction of foul drainage in areas with high groundwater to prevent future infiltration. This can be achieved in short term through direction towards existing information that is available from West Sussex County Council (WSCC) and the Districts and Boroughs. This could then be addressed more comprehensively through the creation of stand-alone or coordinated documents with WSCC or respective authorities that can be used in determining applications as material considerations until entrained in Supplementary Planning Documents following plan making and testing at examination.

The issue of the high groundwater level and associated high susceptibility to groundwater flooding will be essential during the detailed work on solutions for those systems in Arun District. There should be clear direction provided over the appropriate roles and actions to be taken by each party.

Finally, a clear set of comprehensive documents need to be issued on wider strategic issues that affect the whole region, such as that of nutrient neutrality, particularly nitrates although phosphates and others also apply. The Council do not wish to be left as the only area not being able to apply high standards when all it's neighbours are being required to apply such. This would also be counter to the Council's overall priorities to address the climate emergency declared in January 2020 and the intention to raise standards of new developments wherever possible.

Overall in summary, Arun District feel that:

- there needs to be greater content on the existing issues and how and when these are to be dealt with;
- consistency in the methodology used (climate change allowances and DWF calculations);
- significantly greater enforcement of high design details for the robust construction of foul drainage in areas of high groundwater;
- possible recommissioning of redundant assets;

- identify where natural solutions would be expected to occur and engage with all needed in their development; and
- believe there should be investment in the production of standalone or coordinated guidance documents.

I would be grateful if you could contact me at kevin.owen@Arun.gov.uk or phone 07908919397 in order to coordinate possible meeting dates (for the purposes set out and underlined above under 'Option Development and Appraisal') week beginning 8 November.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'K Owen', written in a cursive style.

Kevin Owen (Team Leader Planning Policy & Conservation)

Planning Policy Committee Karl Roberts, Neil Crowther	Report Author	Agenda Publish Date	Date of Meeting	Full Council Meeting Date
Local Plan Update	K Owen	20 May 21	1 June 21	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	20 July 21	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	6 Oct 21	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 Evidence Update	K Owen	18 Nov 21	30 Nov 21	12 Jan 22
First Homes Policy	K Owen			
Southern Water Drainage and Waste Water Management Plan Consultation	K Owen			
To 'make' the Barnham and Eastergate Neighbourhood Development Plan (Review) 2019-2031	D Moles			
Authorities Monitoring Report (AMR)	K Owen	13 Jan 22	25 Jan 22	9 March 22
Housing Economic Land Availability Assessment (HELAA)	K Owen			
Brownfield Land Register (BLR)	K Owen			
Local Development Scheme Update	K Owen			
Statement of Community Involvement – Update	K Owen			
Infrastructure Investment Plan	K Owen			
Budget 2022/23 Timetable	C Martlew			

Local Plan Evidence Update - Biodiversity Net Gain Study	K Owen	3 March 22	15 March 22	11 May 22
Local Plan Evidence Update - Tourism & Visitor Accommodation Study	K Owen			